

**EXHIBIT A**

**The following timeline is intended to be read in conjunction with Consolidated Plaintiffs' First Amended Complaint and is expressly incorporated therein by reference; this document provides a summarized account of the sequence of key events.**

**January 1, 2019:** Justin emails Colleen about *It Ends With Us* book.<sup>1</sup>

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 Johanna 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

**April 11, 2019:** When *It Ends With Us* author Colleen Hoover watched director Justin Baldoni's *Five Feet Apart* in theaters, she told Baldoni, "You are the right person to make this movie" (referring to *It Ends With Us*).

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 movie 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 Weyfarer

<sup>1</sup> Due to international travel, some images may appear to reflect dates and times that vary from the local time when messages were sent or received. In the interest of transparency, times and dates have been left unedited.

However this works out, I would LOVE books for the booklover in fact, not just started a VA firm 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.

### April 12, 2019: Hoover suggests Baldoni portray “Ryle” in the Film

**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.

**May 8, 2019:** Justin options the book *It Ends With Us* from Colleen Hoover

**September 16, 2022:** Baldoni connects with a representative from the nonprofit organization “NO MORE,” which raises awareness and acts to end domestic and sexual violence, with the intention of partnering on the Film. The representative followed up with an email to Baldoni shortly thereafter.

Begin forwarded message:

**NO MORE Representative**

**From:** **NO MORE Representative**  
**Date:** September 16, 2022 at 7:51:05 PM EDT  
**To:** Justin Baldoni  
**Subject:** Great to see you today

Justin

So happy we got a chance to connect today, albeit briefly. I am really excited that NO MORE is partnering with Wayfarer in any way, and beyond grateful as it relates to Microsoft and the movie.

Your comment about not wanting to make DV porn is well taken. Appropriately acknowledging the balance between how childhood trauma impacts us as adults — and not wanting to excuse Ryle's behavior is really hard. Simultaneously, you want the audience to understand Lily's response to Ryle after the violence she experienced as a child without people getting frustrated and wanting to scream "why don't you just leave?" Not easy stuff, but I am confident you of anyone will get it right — in a way that makes a good movie with a strong message.

I love that you want to help victims with the proceeds from the film. For sure direct service is one route, but you may even have heard it today — prevention — which is what ACTM really does — is where the field often prefers huge awareness opportunities like this one focus. In this case, the title of the book/film says it all — II (the intergenerational nature of DV) ends with us, and a great place to start that work is with adult survivors of childhood DV — like Lily. There is so little out there just for that population.

Personally, I love the idea of doing some research about this element of DV and a) using it to inform resources and other tools we might develop for adult survivors and b) using it as part of a potential education campaign accompanying or in the run up to the movie's release. There are so many ways to go — and so many people I can think of right now who could have been Ryle — who have Ryle's in their families which then leads to more Lily's.

Mull it over — happy to talk through/brainstorm.

Be well and have a great weekend!

PS — and I am sure you hear this a lot, but your wife is just lovely. Beautiful inside and out — I can just tell from like 3 minutes of conversation.

**NO MORE Representative**

**September 23, 2022:** Wayfarer partners with Sony; their agreement includes, at Wayfarer and Baldoni's insistence, 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."

**December 31, 2022:** Lively agrees to take the lead role of "Lily Bloom."

**January 13, 2023:** Baldoni and Wayfarer develop marketing ideas for the Film. They share these campaign ideas with Sony, including an idea for "Lily Bloom pop-up shops" nationwide, each of which would provide access to resources and safe houses for domestic violence victims. They also sought to partner with the non-profit "NO MORE," which raises awareness and acts to end domestic and sexual violence.

WAYFARER

Jamey Heath [REDACTED]

**IEWU Campaign Concepts**

4 messages

**Wayfarer Marketing** [REDACTED]

Fri, Jan 13, 2023 at 6:14 PM

**Sony Marketing Team**

Cc: Justin Baldoni [REDACTED], Jamey Heath [REDACTED]

Hi,


It was great meeting with everyone to discuss the vision for the three pre-production social videos and initial content and campaign concepts. I've attached an overview of the topics covered during our call.

We're excited to partner and bring IEWU to current and new fans in creative ways!

Thanks and have a lovely weekend.

Best,  
[REDACTED]



 It Ends With Us\_ Marcom.docx  
31K

**PRE-PREMIERE CAMPAIGN**

- **Nationwide Lily Bloom Pop-Up Shops**
  - Fun and sexy floral shop around the country. Justin (and if possible other cast) to show up impromptu for photos, book signings. Maybe even working in the shop.
  - Partner with a domestic abuse organization (No More) and local shelters to facilitate access to resources and safe houses
  - Early fan screenings across country. Cast flies from screening to screening before premier. (Five Feet Apart Model)

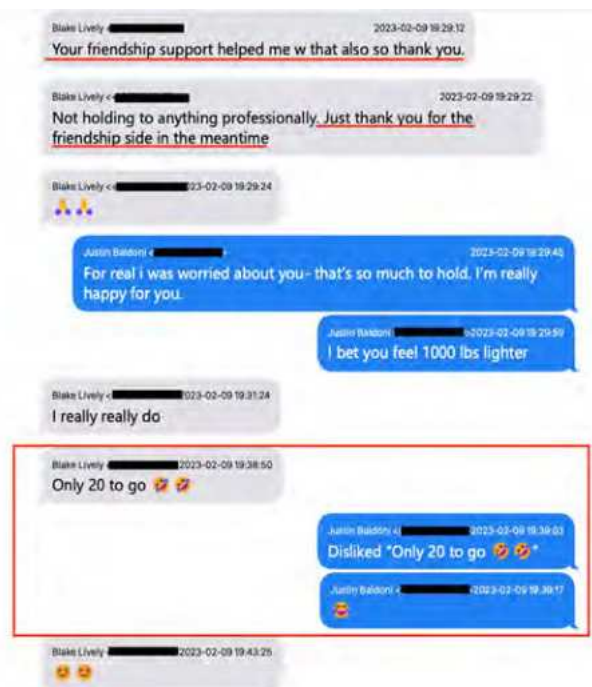
**January 22, 2023:** Lively introduces Baldoni to her friend and celebrity trainer, who would later become Baldoni's trainer as well.

**January 23, 2023:** Baldoni and the trainer start collaborating, with the trainer delivering Baldoni's workout program on February 26.





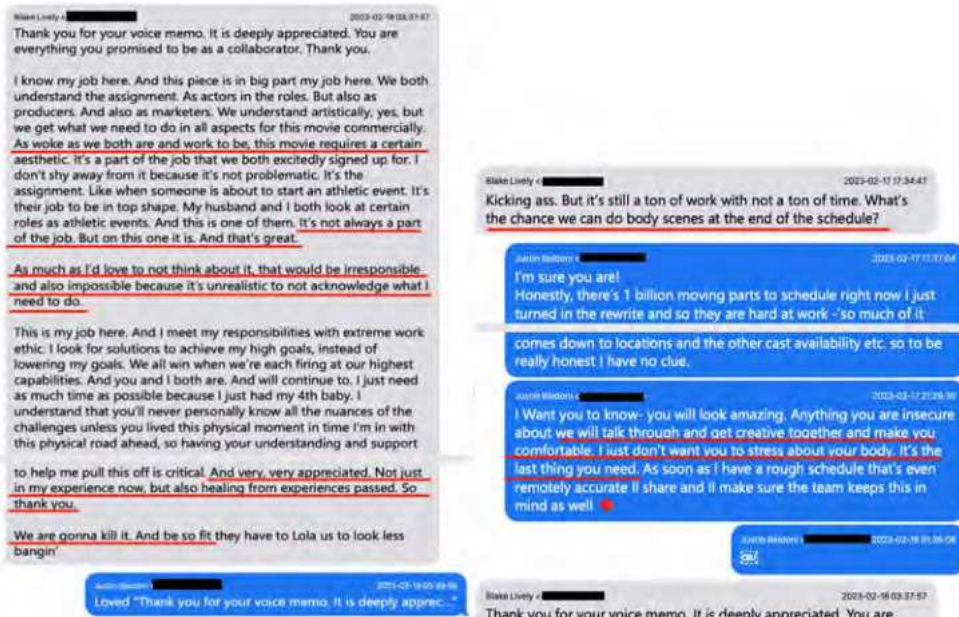
**February 9, 2023:** Lively and Baldoni exchange texts. She jokes with Baldoni that she is 20 pounds from her goal weight. Baldoni responds by disliking the message. Lively thanks Baldoni for his friendship and support.



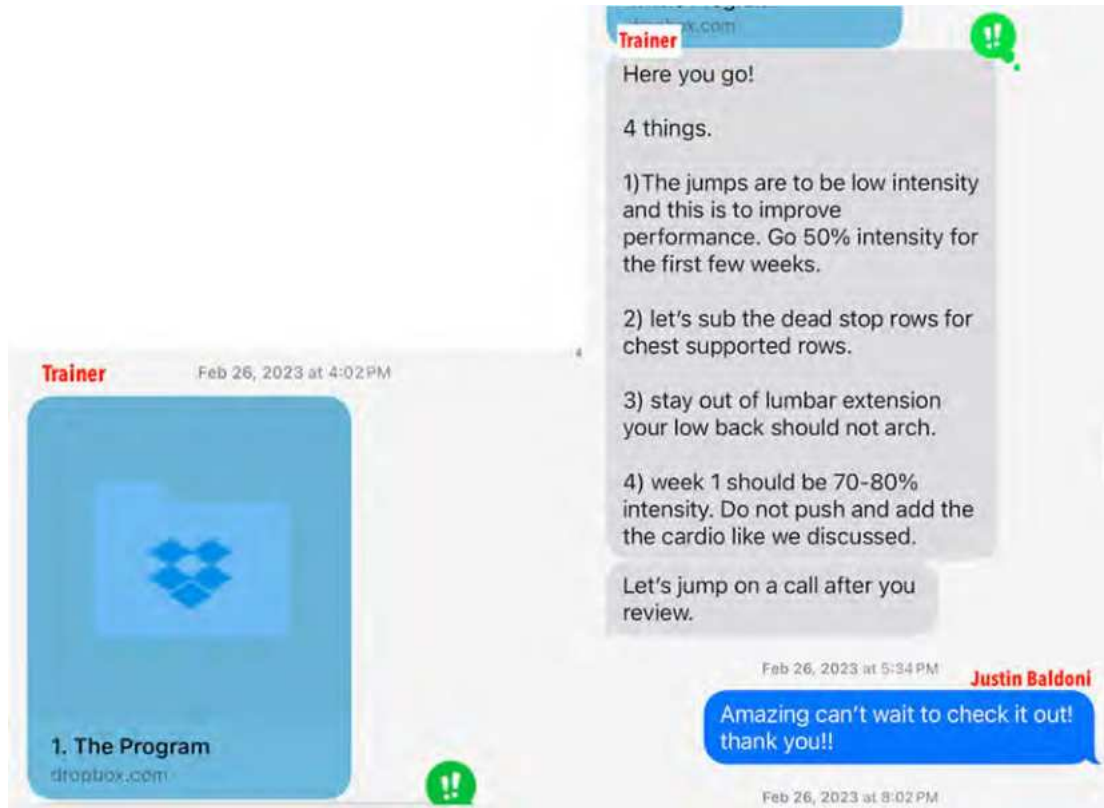
**February 14, 2023:** Baldoni begins writing and sending script revisions to Lively, all the while also building rapport with his co-star and lead actress. Lively responds, "[y]ou're safe here[.]", indicating he need not worry about his choice of words and could speak freely.



**February 17, 2023:** Lively shares her concerns with Baldoni about having her body ready for the forthcoming sex scenes their characters would shoot, asking, “What’s the chance we can do body scenes at the end of the schedule?” Baldoni tries to reassure Lively that she doesn’t need to stress about her body and emphasizes his determination to work collaboratively with her to ensure her comfort.



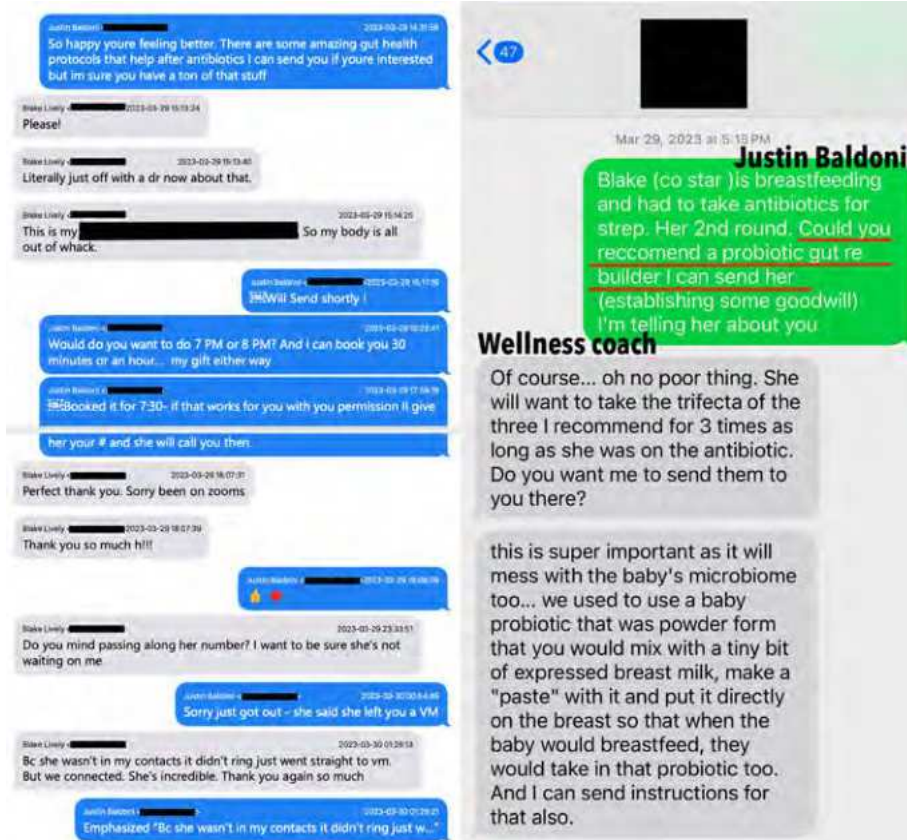
**February 26, 2023:** Baldoni's trainer provides him with a workout program.



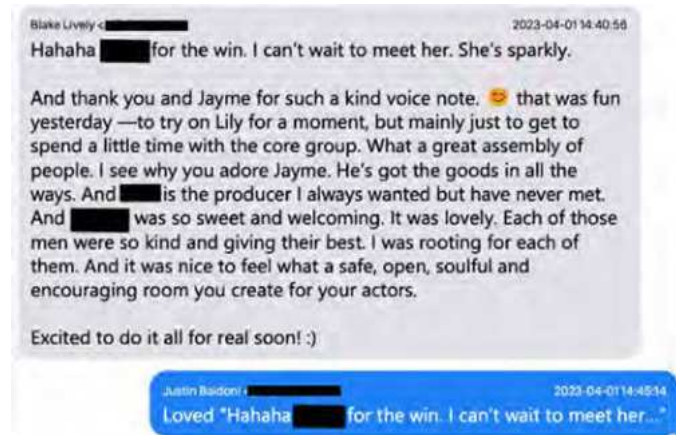
**February 28, 2023:** Baldoni and Reynolds exchange text messages expressing mutual respect.





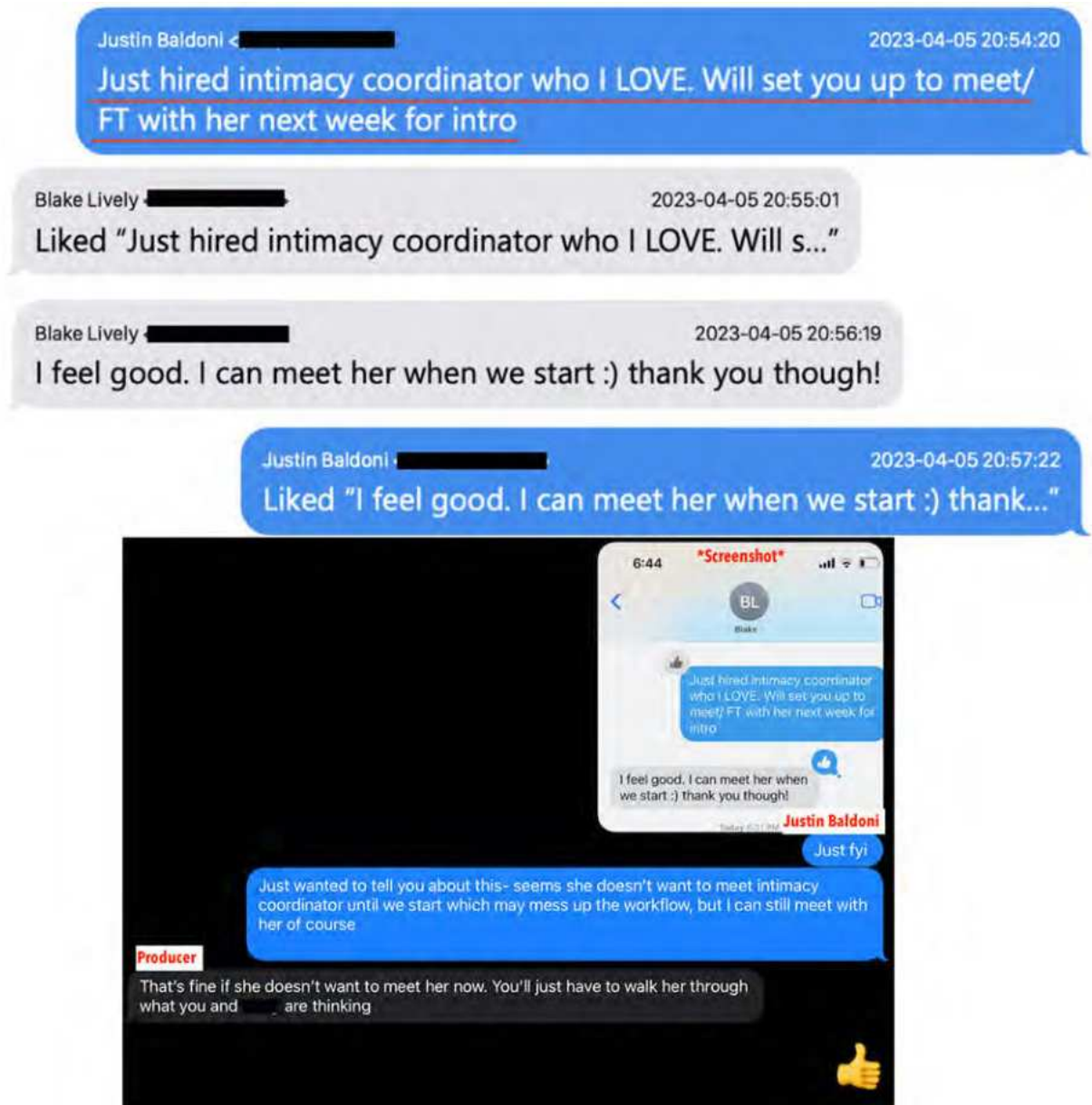


**April 1, 2023:** Blake shows up for in-person “chemistry reads” with potential co-stars to play her love interest, Atlas. At the end of the day, Lively sends a message to Baldoni stating, “that was fun yesterday.... What a great assembly of people[.]”



**April 5, 2023:** Baldoni hires an intimacy coordinator and texts Lively to coordinate a time for them to meet. Lively declines to meet with the intimacy coordinator ahead of filming.





**April 7-8, 2023:** Baldoni shares the updated script with Lively. Lively excitedly texts Baldoni her thoughts on the pivotal Rooftop “meet-cute” scene, acknowledging its significance in the story. She asks if she can take a pass at the dialogue, hoping to infuse more of her voice into the character and make it more “flirty and yummy”. Baldoni welcomes her input, eager to see her take on the moment and make the character hers. He waits for her notes.

Justin Baldoni 2023-04-06 16:53:27  
New script coming to you shortly! We worked on a lot of the Lily and Ryle stuff to make it more playful and sparkly (thank you for giving me my new favorite word) - talk soon.

Blake Lively 2023-04-07 21:04:58  
So excited to read Monday!!!

Blake Lively 2023-04-07 21:05:13  
Love a sparkle pass 🌟🌟

Blake Lively 2023-04-07 23:16:13  
I lied. So excited to get to work on this movie. I can't wait til Monday. Already reading 📖 my kids are gonna kill me. They've had enough of me though for Christ sake.

The meet-cute scene is, to me, the most important scene in the movie. Sets the tone and needs to feel extra special. You ok if I play around with some of the dialogue to give her a bit more agency and fun and send to you? It'll affect some of your lines too if I switch out some of hers. But anywhere we can amp their verbal ping pong/volley, I think we'll be cookin w gas, right? Reel that audience in and make them fall desperately in love w these two, then when the other shoe drops, OUCH, the audience will be devastated.

We can use some, all or none of it.

I just don't want to step on any toes 🙏❤️

Justin Baldoni 2023-04-07 23:19:18  
Fuck yes.

Justin Baldoni 2023-04-07 23:21:07  
I couldn't agree more. It's what I tried to do in last pass and some of what I was hoping we could do together - I can only write and play with what I feel is your tone so much. First scene is most important in film. It's why I'm okay with ten pages- we rarely get to see that in films anymore. Go play and then we can see how it feels together

Blake Lively 2023-04-07 23:52:31  
You're the absolute best. Thank you 🌟❤️. And what you did inspired me. I love what we're gonna do. 🌟🌟

Justin Baldoni 2023-04-07 23:58:13  
Emphasized "You're the absolute best. Thank you 🌟❤️. And what you did inspired me. I love what we're gonna do. 🌟🌟"

Blake Lively 2023-04-08 17:35:16  
I can send you my pass at the roof or just read w you when we get together next week. Lemme know what you prefer. :) if you knew me (in person) longer you'd have a sense of how flirty and yummy the ball busting would play. It's my love language. Spicy and playfully bold, never with teeth. And him serving it back to her is just as important. You don't usually see both the man AND the woman with such agency and humor. Anyway, I can act it out for you next week to make sure it comes through. Or I can send now. Lemme know what you prefer. Xx

Justin Baldoni 2023-04-08 18:10:09  
Sorry - was just crying my eyes out as kids and family just left for another 5 weeks and it was a shit show. 🙏❤️🙏

Justin Baldoni 2023-04-08 18:47:11  
Yes! send it! It's so important to the film and can't wait to play and find it. I agree so much- Lily needs to be strong and witty and playful and bold- that's why I wanted you. It's also one reason why I wanted to age her up. If a woman like you could fall into that relationship then anyone could. And the more we love THEM the more devastating act three is.


Blake Lively 2023-04-08 18:48:36  
That photo is devastating

Blake Lively 2023-04-08 18:48:53  
So sorry to you all. But the love is gargantuan and apparent

Blake Lively 2023-04-08 18:49:27  
❤️🙏❤️ thank you for saying all that. And also couldn't agree more re act 3. That's the mission 🌟🌟🌟

Justin Baldoni 2023-04-08 18:52:19  
Loved 🙏❤️ thank you for saying all that. And also col...

**April 9, 2023:** Lively shares her notes on the rooftop scene with Baldoni and follows up with a text, eagerly awaiting his thoughts. Baldoni responds via voice note expressing his appreciation for her passion and edits. While he likes her changes, he envisions the final version landing somewhere between her take and the original.

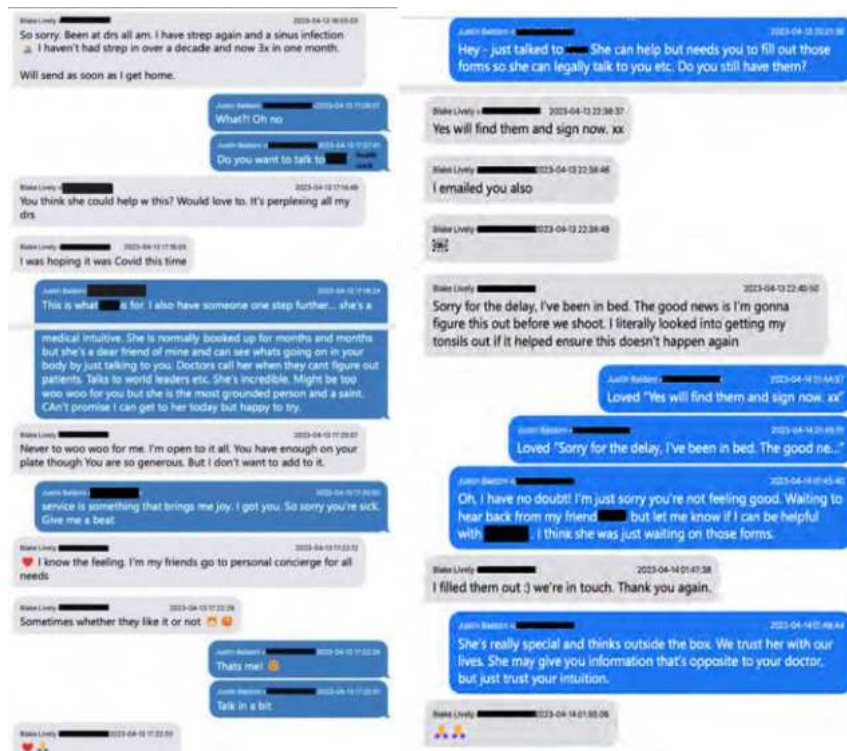
Blake Lively  2023-04-09 20:45:52

Happy Easter 🐰

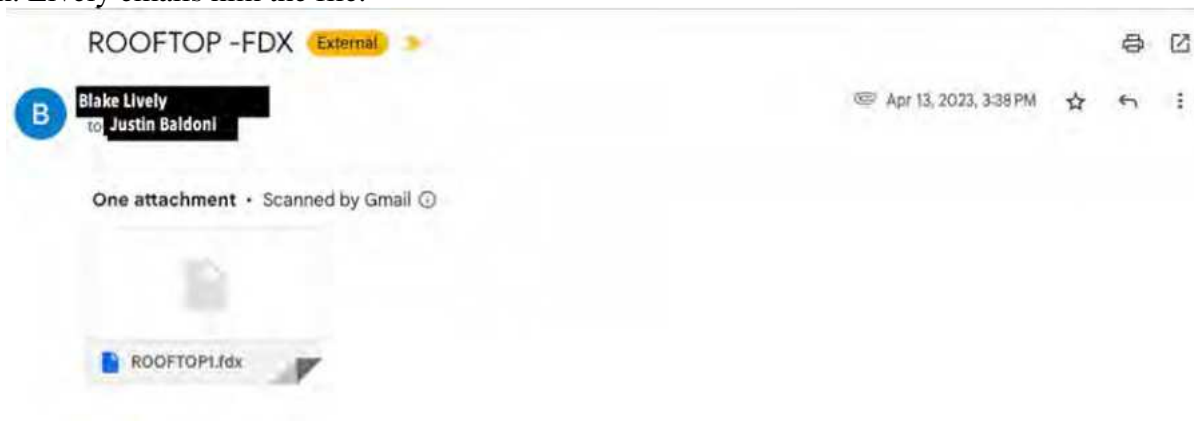
What'd you think of the pages?

**April 12, 2023:** Baldoni meets with Lively at her apartment in New York. He is greeted by Lively's husband, Ryan Reynolds, who enthusiastically praises Lively's rewrites of the rooftop scene, which she had sent on April 8, 2023. Hours later, as the meeting is ending, a mega-celebrity friend of Reynolds and Lively walks into the room and also begins praising Lively's script.

**April 13, 2023:** Lively shares that she is ill again for the third time in one month. Baldoni asks if she would like to speak to his health coach, whom he previously connected her with on March 29, 2023. He also offers to take it “one step further” by connecting her with his medical intuitive. Lively later claimed that the health coach was “not what Mr. Baldoni had represented her to be” and alleged she was a “weight-loss specialist.” She further claimed in her CRD Complaint that this was yet another attempt by Mr. Baldoni to “shame her for her body and weight.”



**April 13, 2023:** Baldoni asks Lively to send him the FDX file of the rooftop scene she worked on. Lively emails him the file.



**April 14, 2023:** Baldoni and Lively text about script changes and enhancing dialogue for the role of Lily Bloom's mother, Jenny Bloom. Baldoni conveys he is happy for Lively to share her notes but ultimately wants to run any changes by the scriptwriter, out of respect. Lively agrees. In the wake of the meeting two days earlier in the presence of Reynolds and their mega-celebrity friend – who Lively describes as her “dragons” in a lengthy text to follow. Baldoni feels obliged to text Lively, saying that he liked her pages and hadn't needed Reynolds and her mega-celebrity friend to pressure him. Baldoni acknowledges Lively's text about her “dragons”, and apologizes for not responding right away. However, he promises to send her a more thoughtful voice note later that evening when he gets home from his plans.



Blake Lively 2023-04-14 15:14:19  
I took a look at Jenny scenes. It's always different when you read with yourself in mind as the character. I see why a higher caliber of talent isn't working out.  
It doesn't feel like Jenny has a POV. If she's going to care so much but what's on the surface, or appearances, we have to at minimum, see what's underneath... we need to see where that comes from.

Or, if we don't have the runway, we need to give her more faceted depth in what we do see of her. I also think we're missing an opportunity to see more of Lily in her mother and vice versa. It would help make the characters pop and feel indelible.

Anywhere we can undercut all the drama with irony, effervescent characters and unexpectedness, our movie will sing.

I think it's a quick pass that doesn't add page count. I'm happy to take a run at it if you send me the script via FDX. I can also play with anything else that needs a little magic to help fast track some of the conversations in rehearsal.

Or if you prefer I stand down, please let me know.

Justin Baldoni 2023-04-14 15:15:00  
Hi! On with NO MORE our domestic violence partner on this film.

Justin Baldoni 2023-04-14 15:16:01  
I think you're exactly right. So well said. Happy for you to take a pass, love what you did on the rooftop, but out of respect, will want to run it back my chrisy once done and get her eyes on it/further tweaks to make sure her voice remains... I just cancelled my next meeting and have a hour. Do you want to hop on Zoom and we can jump into final draft together and collab in real time?

Justin Baldoni 2023-04-14 15:17:00  
<https://www.youtube.com/watch?v=33602>

Justin Baldoni 2023-04-14 15:17:00  
Hope this makes you smile.

Blake Lively 2023-04-14 15:18:18  
cute nailed her dolly! So fun.

Blake Lively 2023-04-14 15:18:23  
Sorry I missed your text earlier

Blake Lively 2023-04-14 15:18:22  
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 [redacted] 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 Khal Drogo, 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.

Justin Baldoni 2023-04-14 15:17:00  
Hi! Wow wow wow. Thank you for writing this... I have so much to say! I'm so sorry for the slow response- I gave a talk tonight to a bunch of Bahai youth in the city and your message came through while I was there and haven't had a second to respond. Going to send you a voice note when I get out of the Uber... hope this doesn't wake you

Justin Baldoni 2023-04-14 15:18:17  
203

Justin Baldoni 2023-04-14 15:18:17  
Some morning thoughts in addition to my 2 AM semi coherent ramble

One of the things that's been the hardest about this adaptation and all the rewrites is playing against the source material. I've re-written the rooftop scene so many times and even though I've changed the movie considerably in many areas I've kept it very close to the book in others. The rooftop is one of those scenes... which is why that last sparkly pass was a lot of fun as it started to open up the movie for me. In some parts I kept it because I remember how fun it was to read the very first time. I also know what it means to the fans. But we're not making a movie just for the fans which is one of the reasons why I like what you did so much. With my first two films tried to make them self-aware as often as I could, knowing the genre they were in, and what I was up against and adding the lightness and little bit of comedy to relieve the pressure. It's the only way I found that meaningful and at times heavy material can actually be digested. That's why my doc series about young people dying did so well, you earn the laughs, and then you earn the tears.

Blake Lively 2023-04-14 15:18:18  
If you send me the fdx I'll work when I can steal moments. And yay of course please send to [redacted] We're all on the same team w the same goal.

Justin Baldoni 2023-04-14 15:18:18  
Great! Also was smacking on rooftop scene today. I really love what you did. It really does help a lot. Makes it so much more fun and interesting. And I would have felt that way without Ryan and [redacted] Your really are a talent across the board. Really excited and grateful to do this together.

Blake Lively 2023-04-14 15:18:18  
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 2023-04-14 15:18:18  
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

Justin Baldoni 2023-04-14 15:18:18  
I think why my doc series about young people dying did so well, you earn the laughs, and then you earn the tears.

What you helped do here is push it even more in that direction which I was missing in parts. The way you kept the structure of the scene while still keeping the important romantic beats was really impressive and actually adds to the sexiness and tension VS takes away from it. I do think us running it together, is going to teach us a lot. If we had shot the the early drafts it could have been like eating too much rich chocolate cake.

I like the messiness, and I like her having real agency and being a willing participant VS him just happening to her and calling out the things about him the audience is already thinking. They are smarter than the studios ever want to give them credit for.

Anyways - just wanted to share that. If you're feeling better, I'm around this weekend to chat in real time.

Will send you FDX final later as well.

Blake Lively 2023-04-14 15:18:18  
Thanks so much for the thoughtful messages. They're very appreciated.

Looking forward to catching up in person.

And I too promise I'll freak you out, spook you, upset you, and be an actual beast. But I can promise it will always be in service of this movie and our shared goal.

But will also always apologize. I appreciate being able to communicate openly always.

Xx

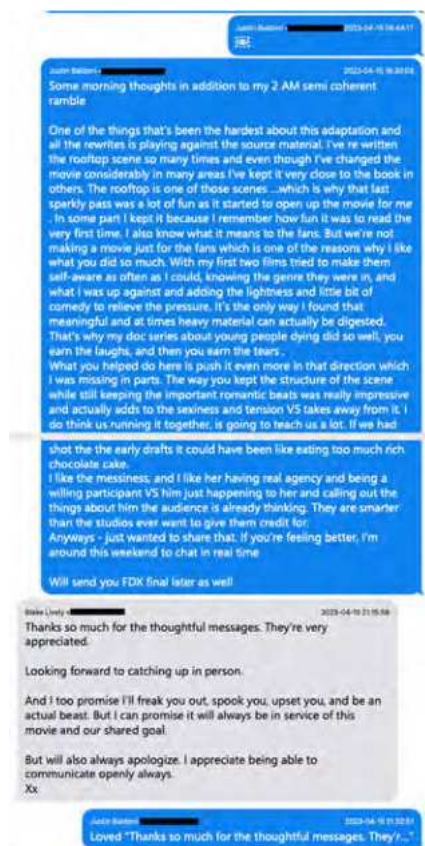
Justin Baldoni 2023-04-14 15:18:18  
Loved "Thanks so much for the thoughtful messages. They're..."

Justin Baldoni 2023-04-14 15:18:18  
Here you go! Since this is our White draft anything starred will come out in colored pages. Since I'm getting pressure to go to a Monday AM maybe let's start there? Also if you can leave tracking on that would be helpful!

**April 14, 2023:** Baldoni followed up with a voice note (as promised) responding to her text about her "dragons", and expressed his sincere apologies for not being more sensitive to her

feelings when responding to her notes on the rooftop scene. He acknowledged how lucky she is to have her husband and friends as her supporters. He also empathizes with Lively's frustrations in having faced situations in her career where she was overlooked or not made to feel like an equal collaborator and hoped that their collaboration on this Film would set a new standard for how she should be treated. Ultimately, Baldoni tried to convey that her thoughts are always welcome and that he is excited to be working with someone of Lively's caliber and all the value she brings to this Film. He spends a considerable amount of time encouraging her and assuring her that she is valued.

**April 15, 2023:** The next morning, Baldoni, ready to continue work, followed up his voice note with a text message to share additional thoughts on the script. Lively responded, thanking him for the thoughtful messages and promising to always do things in service of their "shared goals".



**April 20, 2023:** Brandon Sklenar casting announcement.

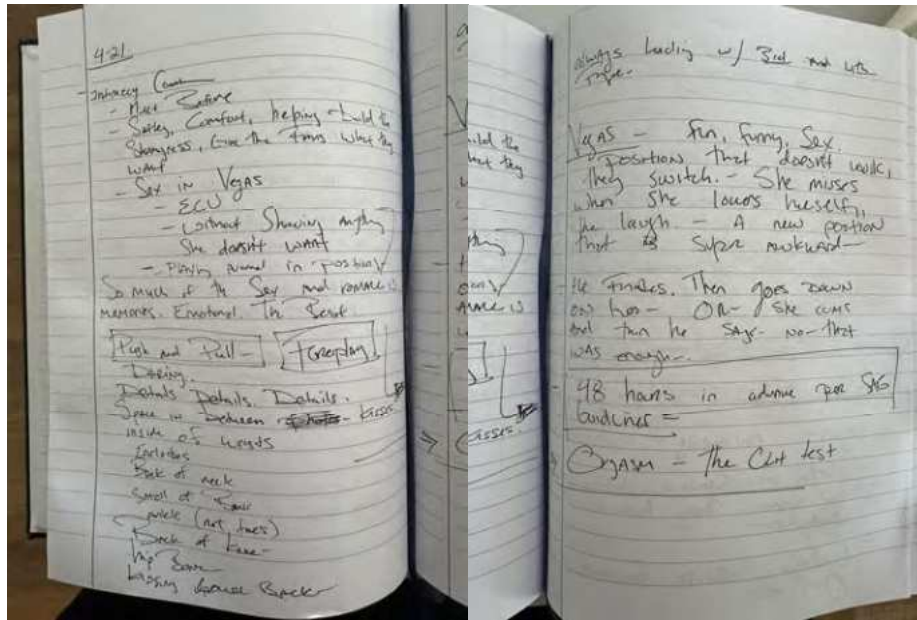




**April 20, 2023:** Concerns about Lively's undue influence over the Film began to grow even before filming started.



**April 21, 2023:** Baldoni meets with the intimacy coordinator to discuss how to shoot the sex scenes. It was important to him that the intimacy coordinator be a woman to help craft sex scenes that would speak to the book's mostly female audience—i.e., be written from the “female gaze.” His notes from this meeting are pictured below and were later shared with Lively during one of their script-writing meetings at her New York apartment. These notes would later become the basis for Lively's Complaint, in which she states that Baldoni would talk about his own sex life and insert gratuitous scenes with Lively's character orgasming. As seen in the notes, these mentions come directly from the intimacy coordinator's notes—“goes down on her,” “orgasm,” “foreplay,” “The clit test.” Ideally, these conversations would have taken place directly between Lively and the intimacy coordinator directly, as Baldoni had requested; however, Lively declined to meet with her, leaving Baldoni in the less than ideal position of having to relay these notes to Lively in her penthouse.



**April 22, 2023:** In preparation for a lift sequence in which Baldoni's character "Ryle" would lift Lively's character "Lily", Baldoni reached out to his personal trainer (a close friend of Lively's) to ask what Lively weighed so that he could train his back muscles for the scene. This was important to avoid injury—not only to Baldoni, who has 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. (script pages of the lift scene are included below). Lively, would later claim in her complaint that this scene did not exist, however as evidenced by the script pages and also a video in which Baldoni is rehearsing the scene with a body double the scene was very real.

RYLE  
Fuck the hand, Lily. I don't care about  
my hand. Are YOU okay?

He looks back and forth between her eyes, assessing the  
cut on her face.

LILY  
I don't know... I think...

RYLE  
I'm so sorry... Please forgive me.

He presses his mouth to Lily's and breathes her in. Lily  
is so upset, she starts to kiss him back, in need of  
comfort. Until- Ryle scoops her up- Gently laying her  
down on the floor. He kisses her wound. A mix of blood  
and tears now.

CLOSE ON LILY. Closing her eyes, accepting his apologies  
so viscerally, by the time she opens them again... it's  
clear she's convinced herself of one thing.

LILY  
... It was an accident.

SMASH TO:

52 INT/EXT. LILY'S CAR / BOSTON PARK - DAY (LATER) 52

**April 25, 2023:** Baldoni was summoned by Lively to her penthouse and greeted by Reynolds, who swore 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 tone from Reynolds and Lively was so aggressive that Baldoni felt he had no choice but to offer repeated (and completely unwarranted)

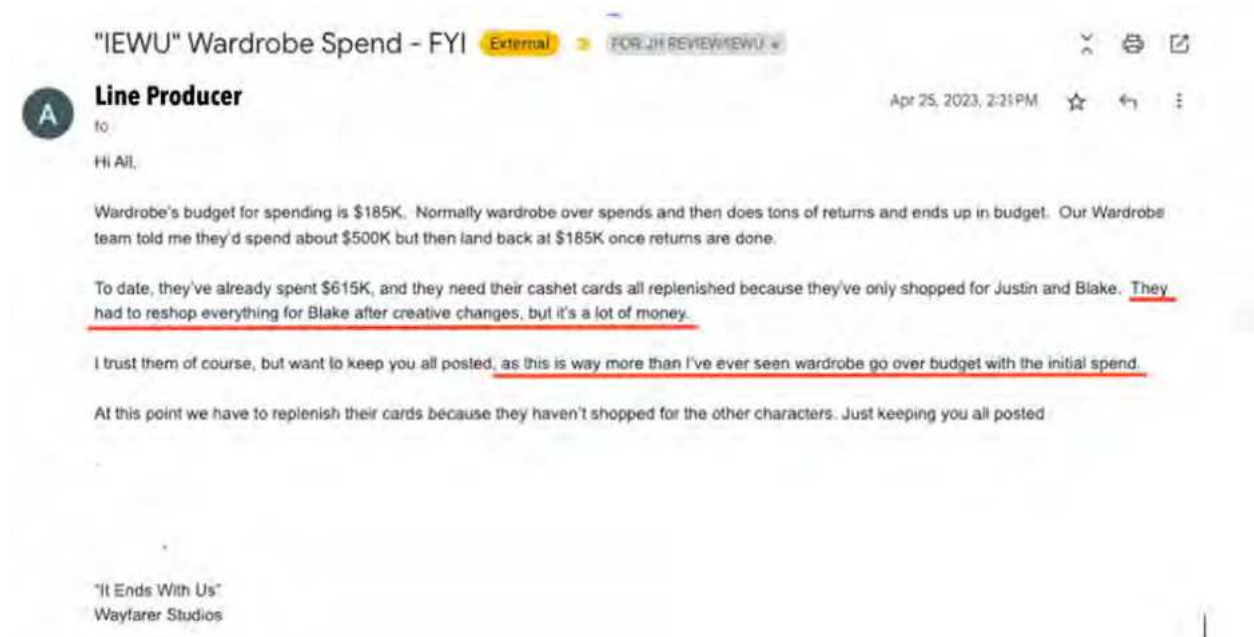
apologies for what was a good-faith and reasonable question to his trainer (*not Lively*). Reynolds demanded that Baldoni remove the lift scene entirely.

In Lively's Complaint, she falsely states that "the scene wasn't even in the Film," suggesting it never existed. Contrary to her attempt to manipulate verifiable facts, the **only** reason the scene was not in the Film is that Lively and Reynolds demanded it be removed, despite the fact that it had already been rehearsed with a stunt-double. Accommodating Lively, Baldoni re-wrote the scene with her despite the fact that, for creative reasons, he felt the scene was necessary.

Baldoni was stunned by Lively's accusation because, when Lively had earlier expressed concern about her postpartum figure on February 17, 2023, and February 24, 2023, Baldoni genuinely reassured her that she "did not need to worry about her body." In fact, it was Lively who insisted that she be fit for the role, despite Baldoni's assurances. In this meeting where Baldoni was aggressively confronted by Reynolds and Lively, Lively told Baldoni that if he could not get on board with how she works, "he still had 2 weeks to recast her."

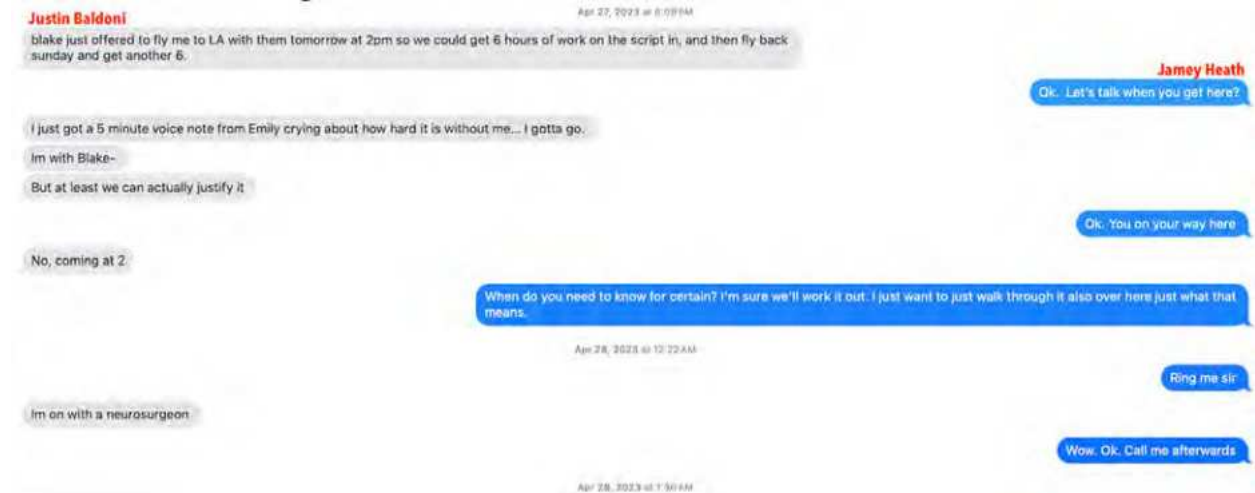
As Lively well knew at the time, it would be impossible to recast her without incurring millions in expenses for a Film that was already half-shot. In addition to financial repercussions, it would cause the studio, and Baldoni, severe reputational damage, including their relationship with Sony, the Film's distributor, and financiers. Thus began a pattern of demands by Lively and acquiescence by Baldoni. He opted to get on board for lack of a viable alternative.

**April 25, 2023:** The Line Producer on the Film shares concerns about the ballooning wardrobe budget resulting from Lively's takeover, stating that it was "way more than [she] had ever seen wardrobe go over budget with the initial spend." As mentioned in the Complaint, "the wardrobe budget ballooned".



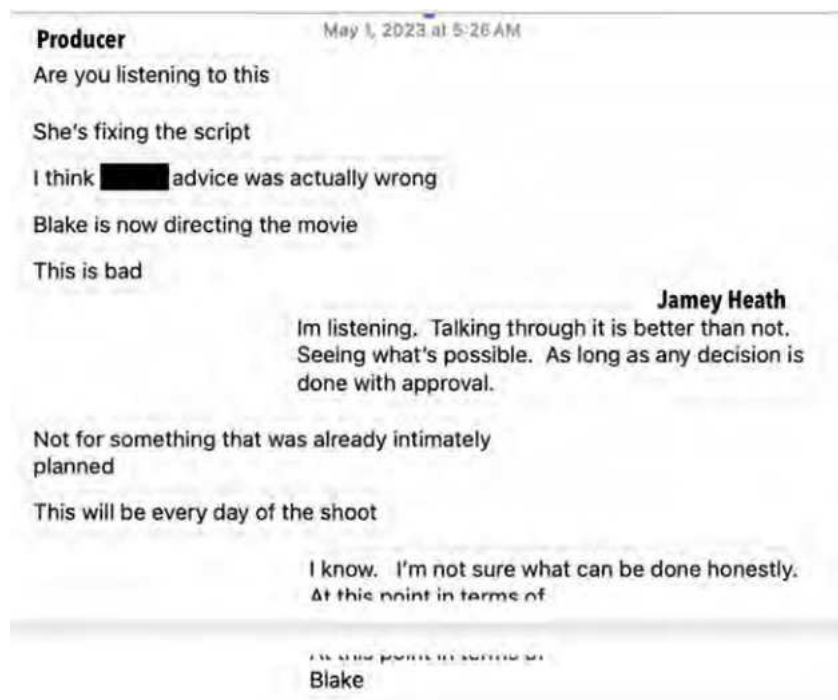
**April 27, 2023:** Baldoni feels homesick; his family is back in California, and it has been weeks since he has seen his kids. Lively offers to have Baldoni fly with her to Los Angeles and back for

the weekend so that the two of them can continue working on the script—six hours there and six hours back. By all accounts, Lively feels at ease with Baldoni and is not only willing but invites Baldoni to share an airplane cabin with her and her children.



**April 28, 2023:** Baldoni flies to Los Angeles from New York with Lively and her family. For the duration of the flight, Baldoni and Lively work on the script. On April 30, 2023, they return together to New York.

**May 1, 2023:** Lively begins altering the script daily. The frequency of Lively's revisions and input alarms the producers, who anticipate that her interference would persist "every day of the shoot" and disrupt the carefully planned production schedule.



**May 2, 2023:** The Writers Guild of America ("WGA") went on strike.

**May 3, 2023:** Lively and Baldoni text almost daily and were comfortable making silly jokes.



**May 5, 2023:** Wayfarer holds a “Respect in the Workplace” meeting via Zoom with the production team to review appropriate on-set behavior and other HR-related matters before principal photography begins. This is a standard part of pre-production and employee training.





### DAILY PREP SCHEDULE

a.o. 5/4/2023 @ 7:00 PM

**\*ALL MEETINGS ARE EASTERN STANDARD TIME UNLESS OTHERWISE NOTED\***

Changes/additions marked in **BLUE**

Friday, May 5, 2023		0.6 WEEK OUT
000:		
8:00 AM	ART DEPT MEETING (IN PERSON)	
9:00 AM	ATLAS TRUCK / LILY CAR SHOW & TELL (IN PERSON) J. Baldoni, J. Heath, [REDACTED]	
9:30 AM LV	SCOUT OF HOSPITAL J. Baldoni, [REDACTED]	
10:00 AM	CALL w/ NEUROSURGEONS J. Baldoni	
12:00 PM	RESPECT IN THE WORKPLACE MEETING (VIA ZOOM)	
1:00 PM	VEGAS ART MEETING (VIA ZOOM) [REDACTED]	
2:00 PM	PRODUCTION MEETING (HYBRID)	
TO FOLLOW	LOGISTICS MEETING PART 1 (HYBRID)	

**May 5, 2023:** Baldoni emails the intimacy coordinator his notes on “sex scenes” after discussing Lively’s comfort level with her. Justin emphasizes that “the way these are shot and what is shown will be a ‘Collaboration between [Baldoni] and Blake.’”

Due to illness in Lively’s family, the Vegas shoot scheduled for May 8, 2023, was canceled. Additionally, because of production delays and strikes, *none* of the outlined sex scenes were Filmed during the May-June 2023 production window (“Phase 1”). These scenes were all postponed to Phase 2 of production (January 5, 2024 - February 9, 2024), which resumed seven months later.

From: Justin Baldoni [REDACTED]  
 Subject: Sex scenes  
 Date: May 5, 2023 at 2:37 AM  
 To: Jamey Heath [REDACTED] Intimacy Coordinator [REDACTED]



## Please note,

The way these are shot and what is shown will be a collaboration between me and Blake.

### First love scene.

Should be passionate, sexy. Should be choreographed in a way that shows a glimpse into their power dynamic. She's in charge and then he takes over. Two strong personalities coming together as one. In terms of sex and what is shown, we should see two naked bodies in various position but only flustering ones Blake is comfortable with. Her choice. Her on top. Him seated and holding her. Him on top. All sensual and beautiful. No nipple. We should be able to go wide for orientation but the majority of the work should be in close ups and 50/50's. I imagine side boob, and outline of butt in close ups (if she is comfortable). I am fine showing my butt (female gaze). There will be pelvic movement but no orgasm. No oral sex. Hands should be able to grope various body parts. If Blake is comfortable showing Rylee kissing her belly and then leaving frame for a moment and then staying on her face I think that's something women would like to see but also fine not doing it as I know oral sex was something off limits but wasn't sure about implied oral sex.

### Vegas

This scene is about friendship. It's a consumption of their marriage and their relationship. Fun, silly, playful. The goal is to choreograph in a way that keeps Blake's clothes on as much as possible. Sex with pelvic movement in positions that work with keeping her dress on. Maybe top of dress slides down and we see some bare back. Dress would be hiked up so may see outline of butt (hard for me to imagine without seeing frame or how dress moves) Hands groping, and I'm okay showing rear as I don't know any other way to make love in an Elvis costume. No nipple. No orgasm. Fun, intimate, innocent.

### Frittata

Morning sex that doesn't happen.

No nudity, tops would be off, kissing around body. They are about to have sex when frittata happens. More about sensuality than sex.

Onesies make out

They come in drunk, making out in onesies. Less about seeing bodies and sex, more about onesies coming off, I'm fine if Blake wants to just take mine off and we make it playful

**May 8, 2023:** As production was set to begin its first days of shooting in Vegas, a member of Lively's family falls ill. Baldoni shares his prayers and wishes for their speedy recovery. Meanwhile, production is left to manage the fallout and attempt to recoup costs from the canceled shoot days.

Justin Baldoni [REDACTED] 2023-05-08 18:00:00  
 My whole family is praying for you guys and your [REDACTED]  
 sending love ❤️❤️❤️

Blake Lively [REDACTED] 2023-05-09 01:01:09  
 Thank you so much. I'm horrified by the timing. Thank you all for your support. This has been brutal. [REDACTED] gonna be ok. We're both gonna be good. Just need to get through it.

Justin Baldoni [REDACTED] 2023-05-09 02:20:20  
 Just so happy [REDACTED] is going to be okay! Rest well

Blake Lively [REDACTED] 2023-05-09 18:46:07  
 [REDACTED] Excited to get home. That was intense.  
 You around tomorrow and or Thursday to go through and finalize script?

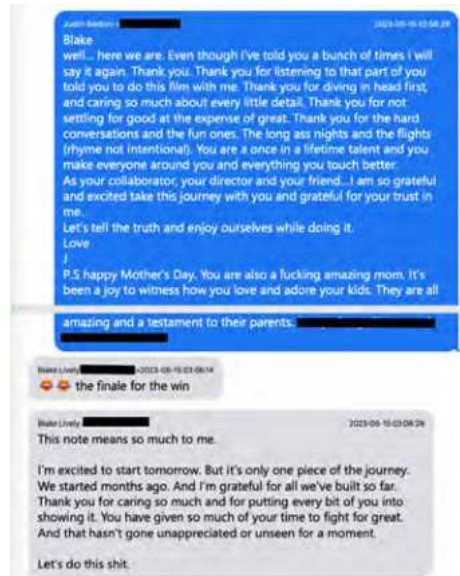
**May 8, 2023:** Lively’s attorney is provided with a Nudity Rider, in which Wayfarer includes the intimacy-coordinator-approved Nudity Rider, followed by written confirmation of the approval. (For clarity, providing the “intimacy-coordinator-approved Nudity Rider” serves as confirmation that Lively and the intimacy coordinator discussed and mutually approved the sex scenes.)

Notably, the sex scenes scheduled for the week of May 8, 2023, had to be rescheduled multiple times due to illness and subsequent strikes. As a result, they were ultimately Filmed in January 2024, meaning no sex scenes were shot during Phase 1 (May 15-June 27, 2023).



**May 12, 2023:** Lively and Baldoni work at her apartment, making final script changes ahead of the first day of production on May 15, 2023.

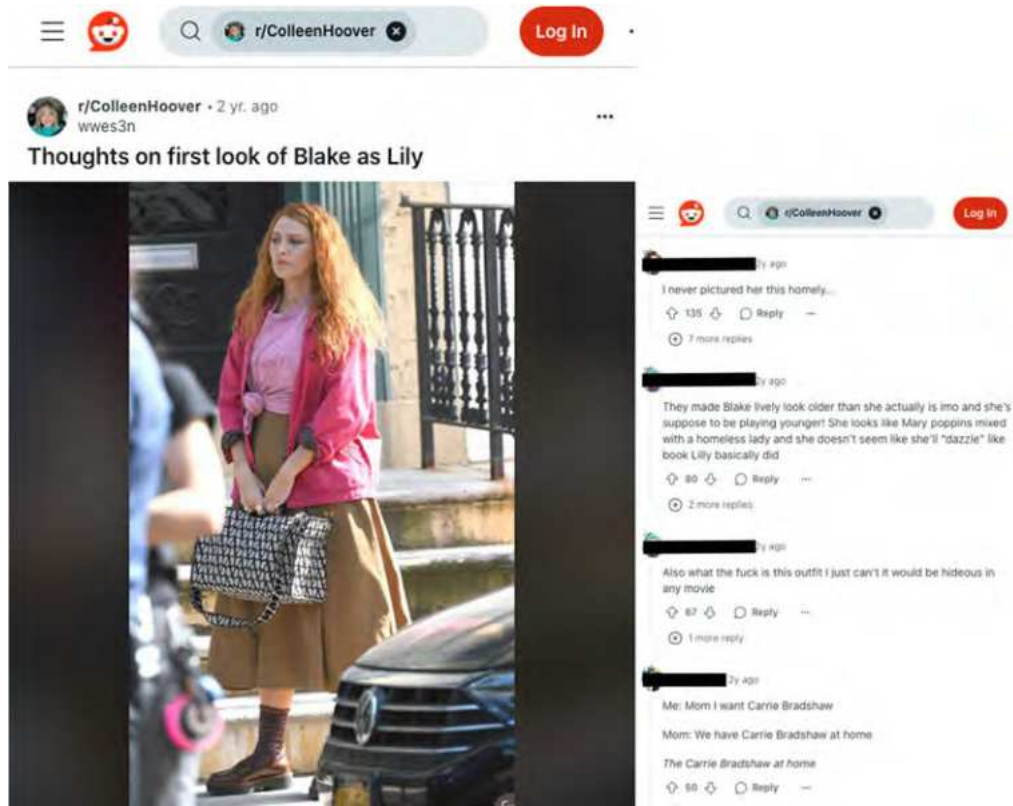
**May 15, 2023:** Baldoni shares an encouraging message with Lively before day one of shooting. Lively expresses gratitude for her collaboration with Baldoni.



**May 15, 2023:** A “NO MORE” representative who attended the table read the day before shares a message of encouragement with Baldoni. Baldoni is eager to establish a plan to ensure that the Film has the greatest impact in supporting victims of domestic violence.



**May 15, 2023:** On the first day of principal photography, paparazzi capture and publish photos of Lively in character, wearing her hand-picked wardrobe. These images were widely criticized as unflattering and sparked a backlash from Sony.



**May 16, 2023:** Baldoni approached Lively in her trailer to discuss necessary wardrobe adjustments and his desire to have more control of wardrobe decisions going forward. Before this meeting, Baldoni texted Heath, saying he was “terrified of saying the wrong thing” and asked Heath to “send [him] prayers.”

The meeting lasted 1.5 hours, as noted in the “Daily Wrap Email.” Lively’s CRD Complaint 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.” 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. Baldoni later realized this was the first of many manipulations by Lively, who in this moment was trying to convince Baldoni to continue her autonomy over her wardrobe.

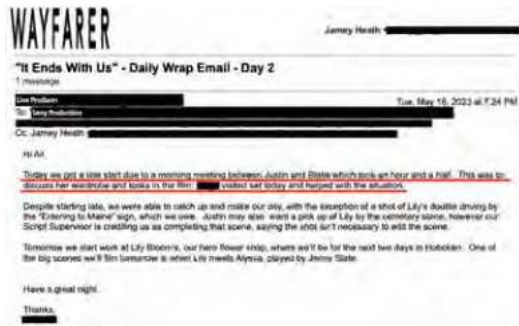
#### Justin Baldoni to Heath

May 16, 2023 at 2:16 PM

Seeing her in ten. Send me prayers -

I'm just saying I've been ignoring my gut and there's a few things we need to course correct on. I'm fucking terrified of saying the wrong thing. Talk after



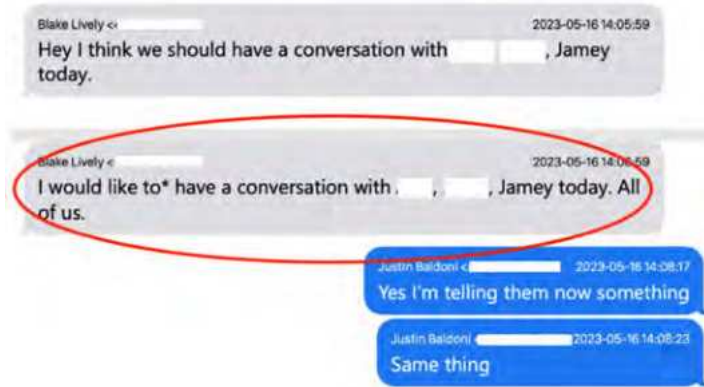


**May 16, 2023:** Later that day, Lively texts Baldoni to request another meeting with him and the other producers to discuss wardrobe. Baldoni agrees. After shooting wraps Producer, Sony Executive, Heath, and Baldoni approach Lively's makeup trailer. Heath knocks on the door and is invited in.

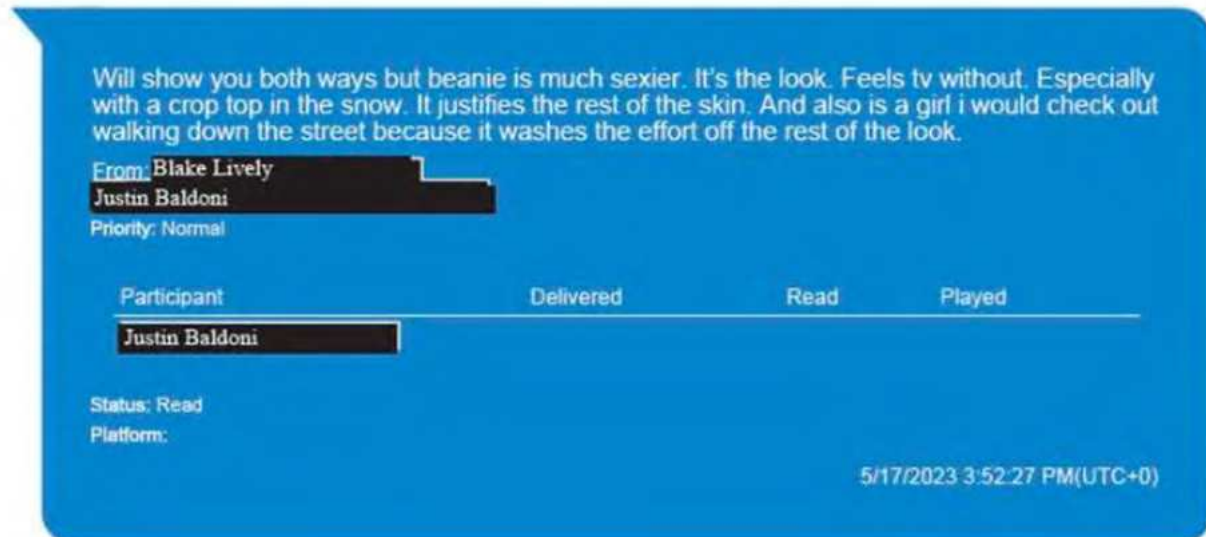
Present in the room are Lively's nanny, makeup artist, and assistant while Lively is having body makeup removed—she was not topless, as she claimed in her Complaint. She was either nursing or pumping while fully covered. Lively asks Heath to face the wall while they determine a time to meet with the other producers, who are standing just outside the door. Weeks later, on June 1, 2023, Lively accuses Heath of making eye contact with her while she had asked him to face the wall. While Heath does not remember doing so, he sincerely apologizes if he made momentary eye contact with Lively while conversing, acknowledging that it was possible he may have out of habit. Lively stated that she “didn’t think he was trying to cop a look,” and they moved on.

Heath pleads with Lively to consider having the meeting the next morning to avoid her getting home too late and losing shoot time the following day. The conversation in Lively's makeup trailer lasts only a couple of minutes, and they agree to meet with the rest of the producers in her personal trailer. Ten minutes later, they meet and discuss the wardrobe at length. Any suggestion that Heath ‘stared’ at her inappropriately is not only blatantly false but also difficult to believe, especially in such a setting.

Furthermore, Lively's Complaint incorrectly states that Lively intended to speak with the producers about unprofessional behavior on this day. As this timeline shows, the allegedly ‘inappropriate behavior’ Lively describes in her Complaint *had not yet occurred*, and the conversation concerned only wardrobe and production.



**May 17, 2023:** 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.” She sends Baldoni the following text, notably, using “sexy” both in person and over text to describe her character. Lively took no issue using the word “sexy” herself, and set the precedent for use of the word being acceptable (as it is in customary colloquial exchanges).



**May 22, 2023:** Lively and Baldoni perform a scripted kissing scene in which their characters get engaged at the hospital. In the sequence, Lively pulls Baldoni in to kiss her. It is clear Lively was initiating the kissing: In one take, she pulls Baldoni in and kisses him once; in another, twice. Lively determined the number of kisses based on what she felt necessary for the scene. Though Lively improvised the number of kisses in this scene, make no mistake—the ‘kiss’ itself was written into the script and was in no way improvised. Contrary to Lively’s CRD Complaint, there was no inappropriate, improvised kissing on set. Any improvisation was made by Lively herself.

**NOTE:** No intimacy coordinator was present on set for this day, as is standard when two professional actors (with over three decades of combined working experience) perform a scene in which only kissing is involved, and no other intimacy (nudity or simulated sex) is required. Furthermore, during preparations, Lively and her attorneys did not indicate in her nudity rider that she wanted an intimacy coordinator present for scenes involving only kissing. Instead, in

line with industry practice, focused solely on bringing one on for the simulated sex and nudity scene(s).

RYLE  
Will you marry me Lily Blossom Bloom?  
Tonight.

LILY  
You've lost your mind. \*

She stops herself REALIZING and bends down kissing his  
face all over.

LILY (CONT'D) \*  
Yes. Yes. Of course. Yes!

HARD CUT TO:

**May 22, 2023:** Shoot Day #6 – Lively prepares to shoot the hospital scene in which her character, Lily, gives birth. In Lively's December 20, 2024, Complaint, Lively alleges that during a "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. This allegation is knowingly false. To begin with, to describe Lively as "mostly nude" and "naked from below the chest down" is inaccurate. Lively was wearing *black briefs and a pregnancy suit* that covered her midsection, and her top was covered by *a hospital gown*.

Additionally, in Lively's Complaint, she stated she was "alarmed" that Baldoni had hired his "best friend" as the OBGYN. The actor portraying the obstetrician is an award-winning, Shakespearean-trained actor with an MFA in Acting from UCLA. In addition to appearing on numerous hit television shows, he has toured nationally with a Tony Award-winning acting company and attended Oxford's acting program on a full scholarship. His engagement was no different than the engagement of Lively's sister, who was hired because she is Lively's sister. Despite their personal relationship, they are both experienced professional actors.

Lastly, in Lively's Complaint, she states that the set was "crowded, chaotic and utterly lacking in standard industry protections for filming nude scenes." For one, Lively was not "nude," nor did the set diverge from industry standards. Further, "closed set" protocols were followed every day on set.

NOTE: Lively alleges that Steve Sarowitz was present for the filming of the birthing scene. This is *entirely false*. Mr. Sarowitz arrived later in the day after the birthing scene had already been shot.

IT ENDS WITH US		CREW CALL		PRINCIPAL PHOTOGRAPHY	
Director: Justin Baldoni Producer: Jamey Heath Exec Producer: Assoc. Producer: Production Supervisor:		8:00A		Monday May 22, 2023	
		8:00A		SHOOT DAY 6 of 35	
		SHOOT CALL		WEATHER: SUNRISE	
		10:00A		Like our honeymoon drive: SUNSET	
PRODUCTION OFFICE:		NJ COURTESY TRAVEL TIME		SCHEDULE: PINK	
		42 minutes		SCRIPT: PINK	
*** CLOSED SET: NO VISITORS ON SET WITHOUT PRIOR APPROVAL. NO PERSONAL CAMERAS ON SET. NO FORCED CALLS *** ** SAFETY MEETINGS WILL BE HELD 9:30AM ON SET **					
* NO HOLIDAYS OR 8+ DAYS WORKED WITHOUT UPN APPROVAL * PRECALLS MUST TAKE NOBS *					
SCENE	SET	DN	PAGE	CAST	LOCATION
107	INT BOSTON GRACE HOSPITAL As Lily cradles Emmy, she asks Ryle for a divorce	D38	27/8	1, 2	
106	INT BOSTON GRACE HOSPITAL Lily is in labor	D38	5/8	1, 2, 18	
87	INT ROXBURY GENERAL HOSPITAL - EXAM RM Lily finds out she's pregnant	N30	21/8	1, 4, 22	
PLEASE BE PREPARED TO WEAR A MASK WHEN WORKING AROUND THE NEWBORN BABIES					

**May 23, 2023:** At the end of Shoot Day #6 on May 22, 2023, Baldoni praises Lively. In turn, Lively expresses her regard and appreciation for Baldoni while acknowledging she could be “difficult and critical of others.”

Justin Baldoni 2023-05-23 00:40:16

I'm not going to tell you that you were amazing because you tease me for being so sentimental - but you were amazing today.

Blake Lively 2023-05-23 00:42:40

Thank you. I do appreciate it. I'm just a ball buster but it means a lot to me. I care a great deal. And always want to deliver.

You were terrific. I'm proud of everything we did today, but really every day.

Justin Baldoni 2023-05-23 00:43:04

Loved "Thank you. I do appreciate it. I'm just a ball bus..."

Justin Baldoni 2023-05-23 00:46:08

Thank you 🙏

**May 23, 2023:** Shoot Day #7 - Baldoni, during a scene in which the cast is wearing loose-fitting onesies, attempts to give Lively directorial feedback regarding wardrobe and encourages her to remove her coat to reveal her onesie to match the rest of the cast, who were also dressed in onesies. In Lively's Complaint, she alleges that Baldoni used the word “sexy” in a tone that made her feel “ogled and exposed.” However, Baldoni, as the director, noted that the look would be “sexy,” referencing the wardrobe for the scene and not Lively personally. (Lively had previously mentioned (verbally and in texts) that she wanted her wardrobe to be “sexy”). *His statements were immediately followed by a gesture indicating that Lively had something in her teeth and a request for someone on set to get her a toothpick. This exchange, all of which was*



*captured on camera, was bookended by Baldoni's immediate recognition that Lively appeared offended; Baldoni offered multiple apologies to Lively moments later, despite the fact that he was merely doing his job.*

### Shoot Day#7 - Call Sheet

CREW CALL		PRINCIPAL PHOTOGRAPHY													
<b>10:00A</b>		Tuesday May 23, 2023													
REHEARSAL		SHOOT DAY 7 of 35													
10:00A		WEATHER: SUNSHINE													
SHOOT CALL		It's a cloud/sun mix at the weather office													
12:00P		SUNSET: 8:13P													
N/C COURTESY TRAVEL TIME (3 minutes)		SCHEDULE: PGM													
		SCRIPT: PGM													
		SAFETY: NOT LSE													
** CLOSED SET. NO VISITORS ON SET WITHOUT PRIOR APPROVAL. NO PERSONAL CAMERAS ON SET. NO FORCED CALLS **															
** SAFETY MEETING WILL BE HELD 20M CALL ON SET **															
** NO HOLIDAYS OR SUNDAY DAYS WORKED WITHOUT SPM APPROVAL. PRINCIPALS MUST TAKE HOURS **															
SCENE	SET	DIR	PAUSE	TAKE	LOCATION										
45	INT BOSTON BAR (SUMMER)	D19	2	1, 2, 3, 7	New Park Tavern										
Revelations about a baby and Ryle having an older brother															
27	INT BOSTON DIVE KARAOKE BAR (SPRING)	W9	2 SE	1, 2, 3, 7											
Karaoke sing along. Lily and Ryle sander with each other															
40	INT SPORTS BAR (SUMMER)	N13	1B	1, 2											
MONTAGE: Lily and Ryle slow dance															
TOTAL PGS: 448															
CAST		STATUS		TAKES		SPY		REHEARSAL		HOURS		SCRIPTS		NOTES	
1	Lily Bloom	W	PU	OT	OT	OT	OT	OT	OT	OT	OT	OT	OT	OT	OT
2	Justin Baldoni	W	GPU	8:35A	9:00A	10:00A	10:00A	10:00A	10:00A	10:00A	10:00A	10:00A	10:00A	10:00A	10:00A
3	ALLISA KINCAID	W	GPU	9:00A	10:00A	10:00A	10:00A	10:00A	10:00A	10:00A	10:00A	10:00A	10:00A	10:00A	10:00A
4	ATLAS CORRIGAN	W													
7	MARSHALL	W	GPU	8:15A	10:00A	10:00A	10:00A	10:00A	10:00A	10:00A	10:00A	10:00A	10:00A	10:00A	10:00A

**May 23, 2023:** Later that day during this action sequence, Lively and Baldoni's characters would kiss, which is all caught on camera. Lively's Complaint later accused Baldoni of "discreetly bit[ing] and suck[ing] on Ms. Lively's lower lip during a scene in which he improvised numerous kisses on each take." As shown in the below script pages, the kissing was not improvised.

Pink Rev. (05/12/23)

67.

IN A SERIES OF QUICK CUTS-

**WE WATCH THESE FOUR LIVE IT UP AT THE BAR IN THEIR ONESIES, LAUGHING AND DRINKING- RYLE GRABBING LILY AROUND THE WAIST AND KISSING HER AS-**

50

INT. LILY'S BOSTON STUDIO APARTMENT - NIGHT

50

-The two tumble into Lily's apartment, ripping at one another's onesies- Until they are both down to their underwear- Ryle kissing his way down Lily's torso. CLOSE ON LILY- As she arches her back in pure ecstasy.

CUT TO BLACK:

**May 23, 2023:** During lunch, as part of a continued creative discussion that Baldoni and Lively were having about the hospital birthing scene, Baldoni asked Heath to show Lively his wife's post-home-birth video, stating to Heath that Lively had not seen one and was presumably interested in watching. Baldoni himself had seen the video prior and felt it was demonstrative of the spirit of his vision for the birthing scene. Heath agreed to share this deeply personal video and approached Lively with the video in hand. He proceeded to show her one second of it before

Lively asked if Heath had permission to share the video, to which Heath confirmed that he did. Lively stated she would like to see the video but asked to watch it after finishing her lunch. Heath did not press the matter and moved on. (NOTE: Lively never did see the video beyond the one-second clip shown to her).

The video in question showed Heath and his wife cradling their newborn daughter post-birth. Notably, his wife was not in labor in the video. In fact, the video begins with the cries of the baby while she is resting on her mother's chest (a still image of this moment is included below). Heath's wife remains covered with a towel for the duration of the video, submerged in water and holding her newborn. This entire interaction between Heath and Lively lasted less than 30 seconds. Lively later likened this one-second clip to pornography and stated that Heath showed her a "video of a fully nude woman with her legs spread apart." The attempt to transform this benign event into an act of sexual misconduct is intentionally offensive, and to characterize a photo with a newborn baby as pornography is perverse.



**May 23, 2023:** That evening, Baldoni and Lively's characters Filmed a "Romance Montage," slow-dancing at a bar, "Completely in their own world."

The complete footage of this scene was released to the general public on January 21, 2025 in direct response to the public lies Lively shamelessly presented in her Complaint. The video directly contradicts Lively's depiction of Baldoni's behavior. The footage shows Lively and Baldoni in character—acting with their bodies—while simultaneously engaging in a personal conversation about their respective marriages, all while continuing to perform their roles as a couple deeply in love. A script excerpt is included below.

40

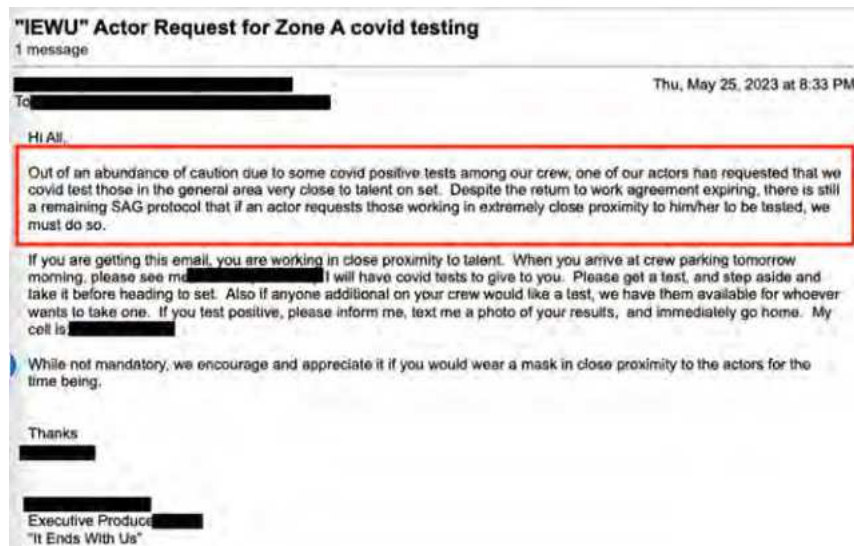
EXT. BAR - NIGHT

40

LILY and Ryle slow dance in the bar. Patrons around them drinking and watching sports. Completely in their own world.

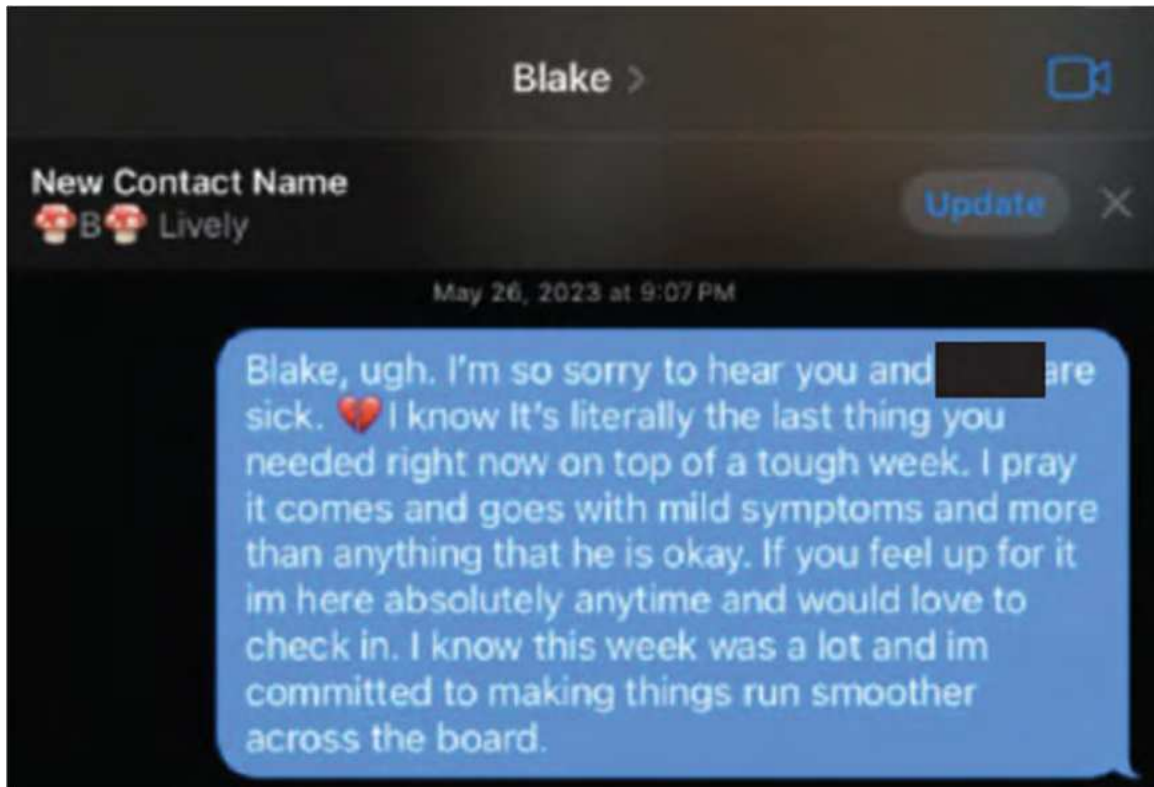
REEL 4		SCENES: 39-47
	RYLE'S LOFT/KITCHEN Spring	
39	ALLYSA IS SHOCKED TO FIND LILY. RYLE WILL TRY NO SEX AND WANTS TO TRY DATING LILY.	
40, 41C, 41D	BAR / LILY BLOOMS / WATER FRONT Spring	
intercut	ROMANCE MONTAGE. LILY & RYLE SLOW DANCE. RYLE HELPS WITH FLOWER ARRANGEMENTS, THEY WALK & TALK	
41E	RYLE'S LOFT/Montage Late Spring	
intercut	THEY WATCH FINDING NEMO. SHE HOLDS HIS SHAKING HAND	
41	LILY BLOOMS Summer	
intercut	LILY RECEIVES CHOCOLATE & DINNER INVITE.	
	ROOFTOP Summer	
42A	PIZZA DINNER ON THE ROOFTOP, RYLE CAN'T DO CASUAL	

**May 25, 2023:** Lively learns that crew members had called out sick with COVID and, as a result, requests that testing be conducted on set. “Despite the return-to-work agreement expiring [which laid out COVID protocols on set], there [was] still a remaining SAG protocol that if an actor requests those working in extremely close proximity to him/her be tested, [they] must do so.” Production complied and informed crew members in close proximity to the cast that they should report for testing the following morning. Contrary to Lively’s Complaint, which states that Wayfarer failed to implement COVID protocols on set, production was under no obligation to conduct regular testing unless specifically requested by an actor—which they did. The email below shows one of the Film’s Executive Producers notifying the crew of the following day’s mandatory testing.



**May 25, 2023:** Later that evening, Lively informed production that she had become ill. Production offered to send someone to her house to test her and her family, but she declined. Lively did not return to production until June 1, 2023. Contrary to Lively’s Complaint, which stated that production “deliberately withheld” COVID cases from her, production was not obligated to inform Lively, nor were they aware of any crew members in her close proximity who had tested positive.

**May 26, 2023:** Baldoni texts Lively to let her know he is “committed to making things run smoother across the board.”



**May 29, 2023:** Wayfarer was made aware that Lively had placed a call to the Film’s Sony executive to share a few grievances.

1. Baldoni’s “sexy” comment about the wardrobe of her character Lily, which, as previously contextualized, was benign and mischaracterized by Lively, who took the comment personally. [Video documentation clearly shows the comment was made in a non-provocative tone by a director to his actress and was not as Lively described].
2. Heath showed her a post-home birth video.
3. Lively shared her grievances about the 1<sup>st</sup> AD suggested that she be replaced. (She and the 2<sup>nd</sup> AD, who is also a woman, were shortly thereafter let go).

Baldoni and Heath were told that, during the call, the Sony executive asked Lively if she wanted to take any formal action regarding her remarks. Lively responded that she was not interested in pursuing anything formally. Following the conversation, the Sony executive informed Baldoni and Heath of Lively’s narrative, both of whom were stunned by the framing of the events.

In her later CRD Complaint, filed more than a year and a half later, Lively distorted the nature of this call, claiming she had contacted the Sony executive specifically to file an HR Complaint and was told Sony was powerless to act. This account is highly dubious, as Lively’s pattern of successfully getting her demands met makes it difficult to believe she would have been dissuaded so easily from pursuing formal action if that had been her true intent. Moreover, Sony



immediately informed Wayfarer, stated that the complaints were *not* sexual in nature, that Lively did not want to file a formal complaint, and that she simply wanted to bring it their attention so that they would be more mindful going forward. Certainly, had she filed a complaint Wayfarer would have formally addressed any issues.

**May 30, 2023:** Baldoni, reflecting on his conversation with Sony Executive #1 on May 29, 2023, regarding Lively’s framing of the “sexy” comment and “birth video”, decides to draft a note for Lively in an effort to rebuild rapport and clear the air. However, Baldoni also sensed that Lively was intentionally manipulating the facts. Despite this, Baldoni asks Producer #1 to pass along the following note to Lively.

Blake ,

I really hope that [redacted] is okay and your symptoms are getting better. I'm so sorry you are going through this.

I want you to know that I've been made aware of your concerns and I hear you. They are fully received and adjustments will be made imminently.

Also, the dailies are looking wonderful and while the last two days were tough... I assure you that your work was fantastic. I truly believe you are creating one of your most honest performances that will have a long lasting and powerful impact.

Look forward to working with you when you feel better.

Justin

**June 1, 2023:** Upon returning to production, Lively requested a meeting with Baldoni and the Film’s producers, during which she shared a series of grievances that she appeared to have spent the past five days overanalyzing. From the outset, it was clear that she had scrutinized every minor interaction and perceived slight from the previous week.

In the meeting, Lively revisited the “sexy” comment—an issue Baldoni had already apologized for twice: first, minutes after the incident on May 23, 2023, and again later. Lively herself had previously acknowledged and seemingly accepted the apology. Despite this, Baldoni apologized a third time in an effort to move forward. Additionally, she accused Heath of looking at her on May 16, 2023, when she had specifically asked him to turn his back during a conversation in her makeup trailer. Heath explained that he hadn’t realized he had looked at her but apologized nonetheless. Lively acknowledged, “I know you weren’t trying to cop a look.”

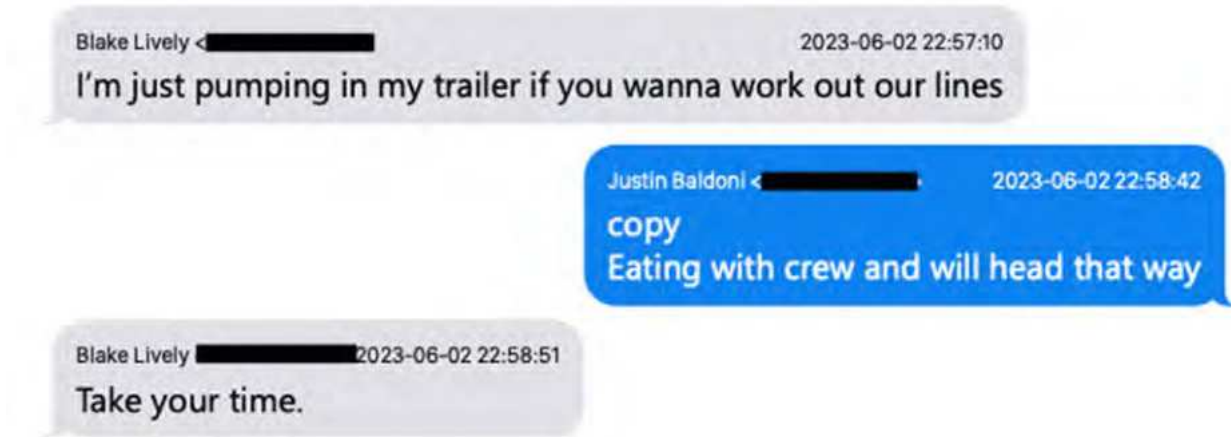
Lively further claimed that Heath had shown her a video of his wife's home birth and thought it was pornographic. Heath, shocked by this characterization, confirmed that she did, in fact, understand that it was a video of a post-birth recording of his wife and newborn daughter. He also explained that Baldoni had asked him to show the clip to Lively as part of a creative discussion, and that Lively actually had not seen the video. Despite the explanation, Heath apologized once more.

The meeting underscored the escalating tensions, with Lively using the opportunity to air grievances over interactions that the team had believed were already resolved.



**IMPORTANT NOTE:** Neither during this meeting nor at any other point during production did Lively bring up any of the more serious allegations that she would later include in her Complaint. We've included the facts of the matter above for the sake of timeline while fully believing that these allegations were only added to Lively's Complaint to bolster her claim and not as a reflection of the truth.

**June 2, 2023:** After sharing her thoughts during the meeting on June 1, 2023, Lively was still comfortable inviting Baldoni into her trailer to rehearse their lines together while she pumped.



**June 3, 2023:** After facing pressure from Sony and one of the Film's producers, who believed Lively was no longer responding favorably to the First Assistant Director, Baldoni and Heath made the difficult decision to dismiss the 1<sup>st</sup> AD, despite feeling she was being unfairly scapegoated. In their text exchanges, both expressed discomfort with the decision.

This move created turmoil on set, as the 1<sup>st</sup> AD played a pivotal role in production, making her replacement a significant challenge. Nonetheless, they ultimately conceded to Lively and Sony's request to replace her.





**June 3, 2023:** Heath informed the 1<sup>st</sup> AD that she would be replaced. Meanwhile, Lively prepared to Film an emotionally intense scene in which her character, alone in a bathroom, reflects on the abuse she endured from her fictional husband. A closed-set protocol was implemented that day, restricting visitors without prior approval to ensure privacy and focus. Lively, who had rewritten the scene herself, was deeply attuned to its intimate and emotional nature and played a significant role in directing the action. Notably, Baldoni's character was not involved in this scene.

91

## INT. ATLAS' HOUSE, BATHROOM - NIGHT

91

Lily enters the bathroom. Finally alone. She turns on the shower and then undresses, through the pain. Each layer that comes off she sees markers of her experience. Shedding their love story she stops and really looks at herself in the mirror. How did this become her? She's on the ground in front of the shower, legs curled to her chest as the water falls down like rain behind her. She doesn't make a sound.

  Director: Justin Baldoni Producers: Jamey Heath Exec Producers: Assoc. Producer: Production Supervisor:  PRODUCTION OFFICE:	CREW CALL	PRINCIPAL PHOTOGRAPHY			
	3:30P	Saturday June 3, 2023			
	REHEARSAL				
	-				
	SHOOT CALL				
4:30P	SAFETY HOTLINE				
	NJ COURTESY TRAVEL TIME	Vigilant EHS Anonymous			
	15 minutes				
<b>** CLOSED SET: NO VISITORS ON SET WITHOUT PRIOR APPROVAL. NO PERSONAL CAMERAS ON SET. NO FORCED CALLS **</b> <b>** SAFETY MEETING WILL BE HELD @ CALL ON SET **</b> <b>* NO HOLIDAYS OR SIXTH DAYS WORKED WITHOUT UPM APPROVAL * PRECALLS MUST TAKE NDBS *</b>					
SCENE(S)	SET	REF	PAGES	COST	LOCATION
93	ATLAS' HOUSE - KITCHEN Atlas leaves breakfast for Lily	D31	2/8	1	
91	INT ATLAS' HOUSE - BATHROOM Lily undresses before taking a shower	N30	2/8	1	

**June 5, 2023:** WGA picketers arrived on **Day #13** of the shoot, forcing production to act quickly to keep filming on schedule. In response, producers devised a solution to shoot on a boat, far from the sound of the picketers' horns. The team "spoke to a boat owner and worked out a deal to shoot on a boat. After rehearsing a scene to shoot there, along with a romance montage moment, [they] were about to have the boat leave the dock and then picketers arrived. At that point [Lively] wouldn't cross the picket line, so we called lunch." Despite being obligated by her union to continue shooting, Lively refused to do so. According to the **SAG-AFTRA** website (<https://www.sagaftra.org>), "SAG-AFTRA has a no-strike clause in our Codified Basic Agreement, at Section 3, that states: 'The Union agrees that, during the effective term hereof, it will not call or engage in a strike affecting motion picture production against any Producer signatory hereto.'"

## "It Ends With Us" - Daily Wrap Email - Day 13

2 messages

Line producer [redacted] Mon, Jun 5, 2023 at 1:53 PM  
 To: Sony production [redacted]

Cc: Jamey Heath &lt;

Hi All,

Today we intended to shoot the finale of the film at a park in Jersey City. We were met with picketers at all entrances to the park. They then began chanting. We moved the crew and work trucks to base camp, which happened to be along the water. We spoke to a boat owner and worked out a deal to shoot on a boat. After rehearsing a scene to shoot there, along with a romance montage moment, we were about to have the boat leave the dock and then picketers arrived. At that point Blake wouldn't cross the picket line, so we called lunch. After lunch the picketers were still at the park as well as blocking the entrance to the base camp lot. We then called wrap.

We shot one insert today of Lily putting a napkin on her fathers grave. We cheated it in the base camp lot.

Justin and Blake are rehearsing now for upcoming scenes.

Tomorrow we are back at our Lily Bloom's flower shop location in Hoboken to complete our work there.

Thanks



If you are contracted to work on a project that continues production while the WGA is on strike, you are legally obligated to continue working in any capacity covered by a SAG-AFTRA collective bargaining agreement by the "no strike" clause in our collective bargaining agreements. You can continue to audition for work if you choose to do so.

Like most unions, SAG-AFTRA has a no-strike clause in our Codified Basic Agreement, at Section 3, that states:

"The Union agrees that, during the effective term hereof, it will not call or engage in a strike affecting motion picture production against any Producer signatory hereto."

Further in this section, the language reads:

"The Union agrees that it will take such affirmative action as may be necessary and lawful in order to require its members to perform their respective obligations under the provisions of this Section 3."

SAG-AFTRA therefore advises its members to continue to work. The WGA is aware of the requirements of our no strike clause and our members' individual personal service agreements, and the fact that the labor law protections that apply to striking workers do not apply to other workers whose contracts are still in effect. If you as an individual decide not to report to work as required, you may be subject to breach of contract claims or be subject to termination by the Producer.

**Screenshot taken from SAG website (<https://www.sagaftra.org>)**

**June 5, 2023:** Baldoni, still feeling terrible about letting the 1<sup>st</sup> AD go, shared that he wanted to reach out. Below is the text exchange between Baldoni and Heath.

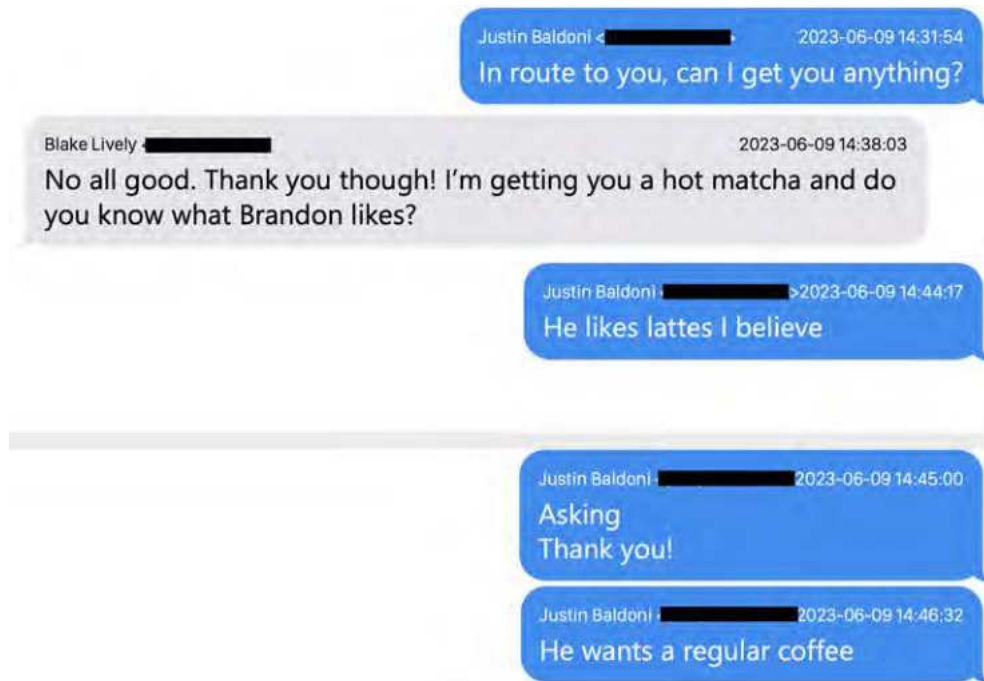
**Justin Baldoni**  
 I feel like I need to write or call... seems so wrong to be silent

**Jamey Heath**  
 Yeah, I get it.  
 I think you should write an email... Not a phone call or a text it's a bit too casual... Also, I don't think it should be a long one and over explaining right now I think it would fall on deaf ears. Sometimes we need to just feel the pain And work through the frustration so that then any words offered can be received. But I agree not saying anything seems wrong. I think just some words like "I know this must be hard I'm so sorry. Hopefully we can have a conversation at some point when you feel it to be appropriate but for now, I simply wanted to tell you that I appreciate you and I'm so very sorry. This is not your fault". Whatever version you're right I think it should be short and not trying to explain yourself because that'll feel right now. Like an excuse and that's not what anybody wants in that position at the moment. OK I'm surprised Siri is getting everything so accurate. I love you.

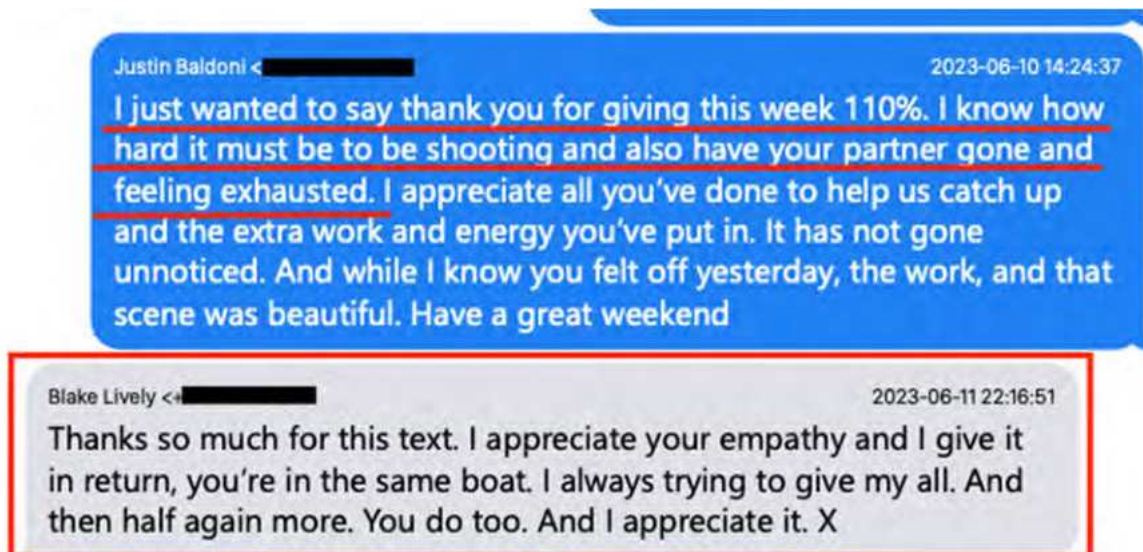
I just want you to know that I love and appreciate you. Deeply. This whole thing has been a heartbreaking mess. I know this must be hard and I'm so sorry.  
 Hopefully we can have a conversation at some point when you feel it to be appropriate but for now, I simply wanted to tell you that I appreciate you and I'm so very sorry.  
 This is not your fault, and not that you need it but Jamey and I and everyone at Wayfarer will always be defenders of you, your work ethic, skill, and heart.  
 Love  
 Justin

Wonderful. It says appreciate you twice. Maybe Change one of them to a different word. Otherwise send away.

**June 9, 2023:** Lively and Baldoni still remained cordial and kind over text.



**June 10, 2023:** Recognizing that it had been a tough week with multiple production shutdowns due to picketers and an extra shoot day added on Saturday to make up for lost time, Baldoni sent a text to Lively stating, “I just want to thank you for giving this week 110%. I know how hard it must be shooting and also have your partner gone and feeling exhausted.” Lively replied, “I appreciate your empathy and give it in return, you’re in the same boat.”

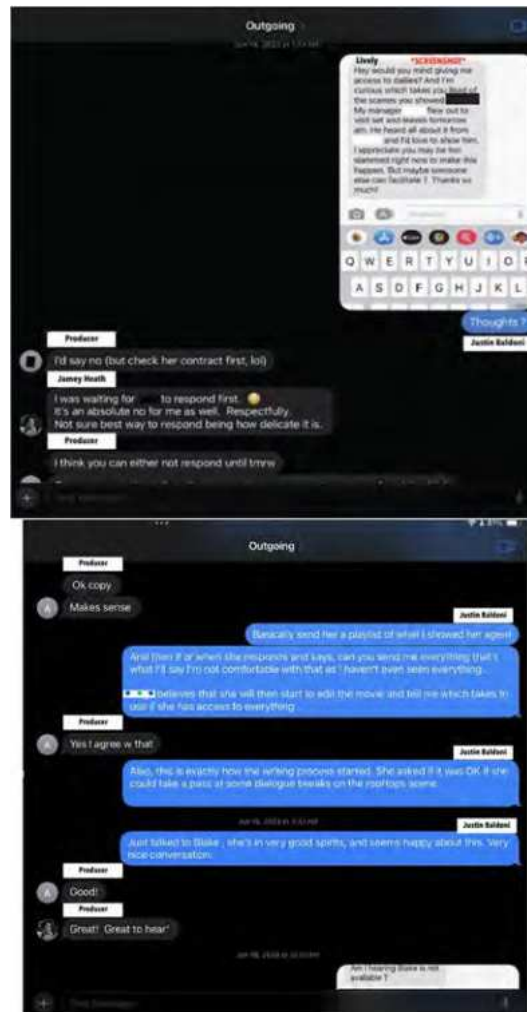


**June 13, 2023:** Lively asks Baldoni for access to the “dailies” via text message.

Blake Lively 2023-06-13 23:53:48

Hey would you mind giving me access to dailies? And I'm curious which takes you liked of the scenes you showed [REDACTED] My manager [REDACTED] flew out to visit set and leaves tomorrow am. He heard all about it from [REDACTED] and I'd love to show him. I appreciate you may be too slammed right now to make this happen. But maybe someone else can facilitate ? Thanks so much!

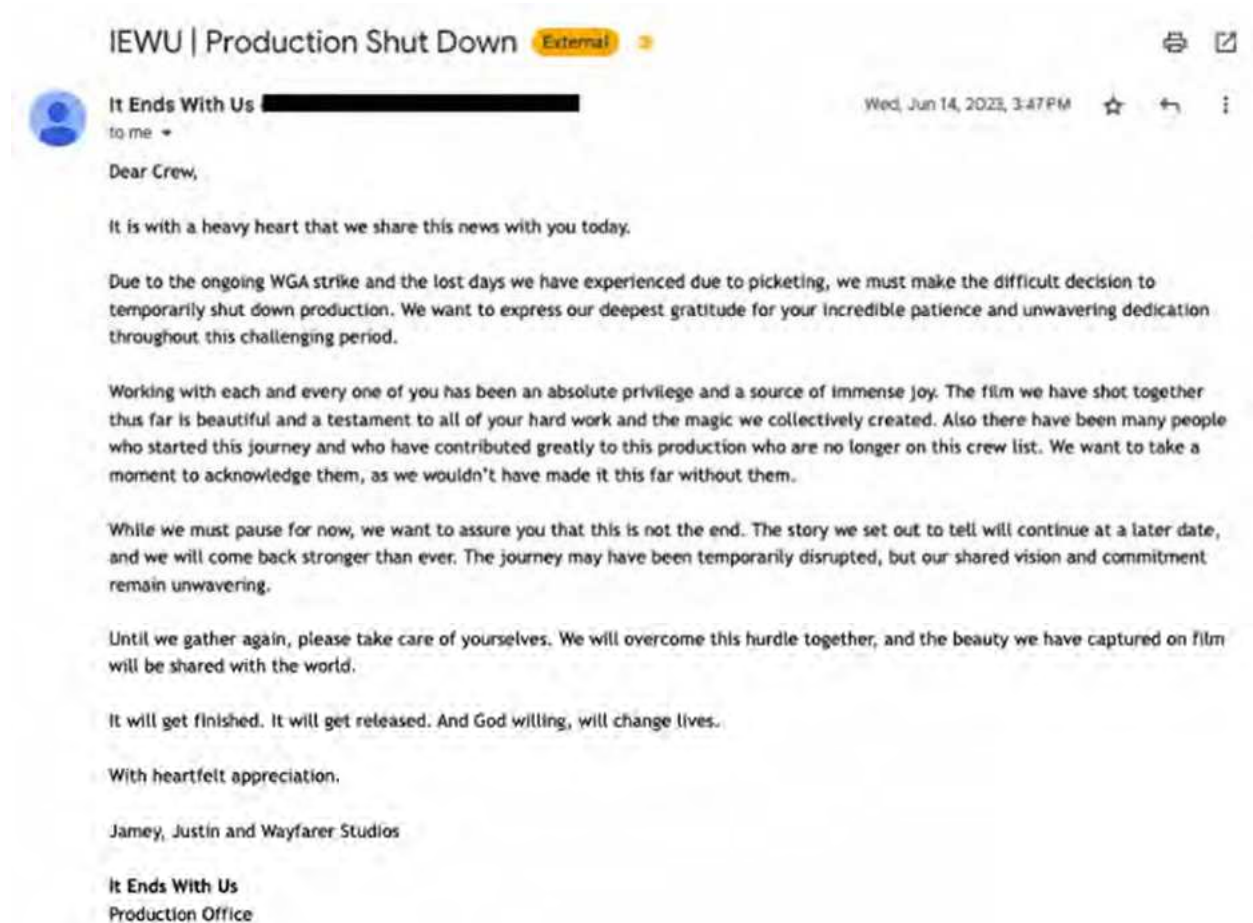
**June 14, 2023:** Baldoni shares with his production team Lively's unorthodox request to see the dailies. Concerned about Lively's tendency to overstep and take control, Baldoni consulted his producing team on how best to respond. The team unanimously advised against granting her access, fearing she might "start to edit the movie and dictate which takes to use"—a concern that ultimately proved accurate. However, as a gesture of goodwill, Baldoni chose to compromise by sending her a curated five-hour playlist instead.



slammed right now to make this happen. But maybe someone else can facilitate ? Thanks so much!

Justin Baldoni 2023-06-14 03:52:57  
 Hey, it's been nuts here with all that's happening. I've heard great things about [REDACTED]. Let me try to get you a playlist of dailies for you to show him tomorrow

**June 14, 2023:** Due to the ongoing WGA picketing, Baldoni, Heath, and Wayfarer made the difficult decision to shut down production until the strike was resolved.



**June 15, 2023:** Production on the Film was temporarily halted on June 14, 2023, due to WGA picketing. The next day, June 15, 2023, production was notified that the WGA had agreed not to picket their set, allowing filming to continue. Production attempted to reach out to Lively to stay until the 23<sup>rd</sup> as originally planned, but she had already made arrangements to join her husband in London and refused to return. In total, Lively shot for 16 days during Phase 1 of production.

Below is an email from *It Ends With Us* production attorney notifying Lively's lawyer that, despite Lively's unavailability, production had not shut down and further inquired about the status of the still unsigned Certificate of Engagement (the preliminary contract required before commencing work). This email was sent on June 21<sup>st</sup>.



**From:** Production attorney  
**Sent:** Wednesday, June 21, 2023 3:38 PM  
**To:** Lively's attorney  
**Cc:**  
**Subject:** Re: Lively/IEWU

Hi

Yes, we had to shut down for one day due to the strike. However, after receiving a waiver from the WGA the next day, we were cleared to pick up again.

Production made an attempt to reach out to Blake to stay until the 23rd as originally planned, but we were told that she was leaving and as a result, we are using the time to shoot other scenes where Blake's character is not in.

We have to do pick ups at a later time. As of now, production has not shut down.

Could you please advise on the status of getting the C of E signed?

Thank you,

**June 16, 2023:** Wayfarer undertook a significant and costly effort to rework the shooting schedule, prioritizing scenes featuring the younger versions of the characters (who had not shot any scenes thus far) over those requiring Lively. This was no small task, as it involved relocating to different locations, securing revised shooting permits on short notice, and coordinating adjustments to travel plans and accommodations for cast and crew. The logistical challenges were immense, but the team worked tirelessly to maintain the Film's momentum and ensure a smooth transition.

**June 22, 2023:** Alex Neustaedter (Young Atlas) participated in an on-set electronic press kit (EPK) interview designed for the Film's promotional campaign. Below are the questions and the producer's responses, highlighting his experiences on set and his thoughts on working with Baldoni.

**Speaker 1 (05:35):**

Yeah, I'm a huge supporter of that for sure. What have you seen, what's been, I'll ask it in kind of a different way than it's here, but tell me about working with Justin, what that's been like.

**Alex Newstead (05:48):**

I love his energy man. He brings so much passion and he cares so much about it that you can't help but feed off of that. And even through all the turbulence of these scenes that we're doing, it's just that energy and that passion that's really driving everything. And also he's very creatively open if things aren't feeling right or we need to change, little things super flexible, which really makes all the actors more comfortable together, I think.

**June 22, 2023:** Isabela Ferrer (Young Lily) participated in an on-set EPK interview designed for use in the Film's promotional campaign. Below are the questions and Isabela's responses, focusing on her experiences on set and her thoughts on working with Baldoni.

Yeah, let's do that. Let's just get a couple seconds. Couple seconds of room tone. All right. Okay. Ready? What is the most rewarding part of being on the It Ends With Us set?

**Isabella Ferrer (01:49):**

At least for me, this is one of my very first projects, so I think working with professionals that I've been doing have been doing this for a really long time, but also who are so open. The crew and Justin and all the actors that I've worked with have just been so open and welcoming. I've never felt belittled in any sort of way. I think just being able to come into set and feeling seen and heard and feeling immediately comfortable and being able to just go in to do what I do and not having any anxieties or worries about how I might be or, yeah, I just feel very accepted, I think.

**Speaker 1 (12:56):**

I'm going to ask you one last extra question, which is how has it been working with Justin?

**Isabella Ferrer (13:00):**

Oh my God, so good. So so so so good. He's been so generous with advice and just overall in the entire process of letting me observe and really take in everything he's taken really good care of. I mean, everybody, it seems, and I think there's a lot that's always is going on in productions, and I think he has a really great method of just being able to keep things positive and find ways of uplifting and then going, and then there's also this look at that, and I feel like that's, as an actor who's also first starting, when you're trying to get used to everything, it's really important to have someone go, that's really good. Okay, now let's look at this. And there's no patronizing, there's no, I don't feel not heard. I always feel like I can go up to him and ask for anything. I mean, our first phone call after I got this job, it was a FaceTime, and the first thing he said to me was like, whatever you need whenever, call me. I immediately had his number. There was an immediate understanding that literally, whatever, if I needed anything, I knew that I could reach out to him. And that was immediately such a comforting feeling that I wasn't just diving into something and not knowing what was going to happen. Yeah.

**IMPORTANT NOTE:** Isabela and Alex Neustaedter shared these sentiments regarding their working experience with Baldoni prior to spending time with Lively during the promotional tour of the Film.

**June 22, 2023:** Brandon Sklenar participated in an on-set EPK interview designed for use in the Film's promotional campaign. Below are the questions and Brandon's responses, focusing on his experiences on set and his thoughts on working with Baldoni.

**Speaker 1 (08:49):**

Well, how about this? Did you talk to Justin? Did Justin reach out to you to talk about the piece?

**Brandon Sklenar (08:54):**

Oh yeah. No, he did. Yeah. I'll get into, I mean, I'm just trying to string it together in my brain so it makes sense. Yeah. What drew me to the project initially, I didn't have an awareness of this book and the significance it had in the world. I mean all over the world. And I had a phone call with Justin Baldoni, our director, and over the course of that phone call, it became very clear to me what this was and what it meant to the people who have read this book, men and women alike, but largely women all over the world, and how much it's helped them. And then also Justin's passion and his intention behind making this film, I think was one of the biggest things for me because he does have such a strong intention and you can feel it when you speak to him about it. And I think when creating anything, I mean, that's kind of paramount in making something halfway decent. And his intention is very strong and he hires people who also have a very clear intention. And I think collectively the chances of making something that is impactful, hopefully as marginally impactful as the book has been, would be a massive success. And I think that was a real eye-opener to me just hearing him firsthand and what it meant to him and what it's meant to so many people.

**Speaker 1 (10:57):**

If you have at all. How have you seen that translate to daily on set sort of experience of actually making the film versus talking about it theoretically beforehand?

**Brandon Sklenar (11:08):**

It's translated just in terms of just the vibe on set. It's a really, really pleasant set to be on, and it comes from the top. Jamey Heath, our producer, he's such a lovely guy, and Justin is so warm and there's no tension. It's just a very open, safe environment as you'd hope it would be given the subject matter of the film and the message we're trying to get across. But it isn't always the case on sets. It could be really tense environment and that's sometimes kills art and sometimes it fuels it. But I think in this case, it's essential for making what we're doing. I'm grateful to him for that because it's truly been a really, really pleasant experience being on the set. Yeah.

**Speaker 1 (22:34):**

Alright, last two, and then we'll do the social bits. You don't have to say anything nice about Jamey going on the record. You don't have to say anything nice about Jamey. How was it working with the producers? [REDACTED] and Jamey?

**Brandon Sklenar (22:50):**

Both of them are, I've had more interaction with Jamey, but both have been great. I mean, like I said earlier, it's just been a really, truly positive work environment, just really kind people. And I think it just comes from the top. I mean, we've had some bumps along the way as you do in films and scheduling things and unexpected shifts and location changes and schedules and everyone just, I've yet to see someone throwing a clipboard and yelling or anything. So everyone seems to

13 of 14

**IEWU BTS**

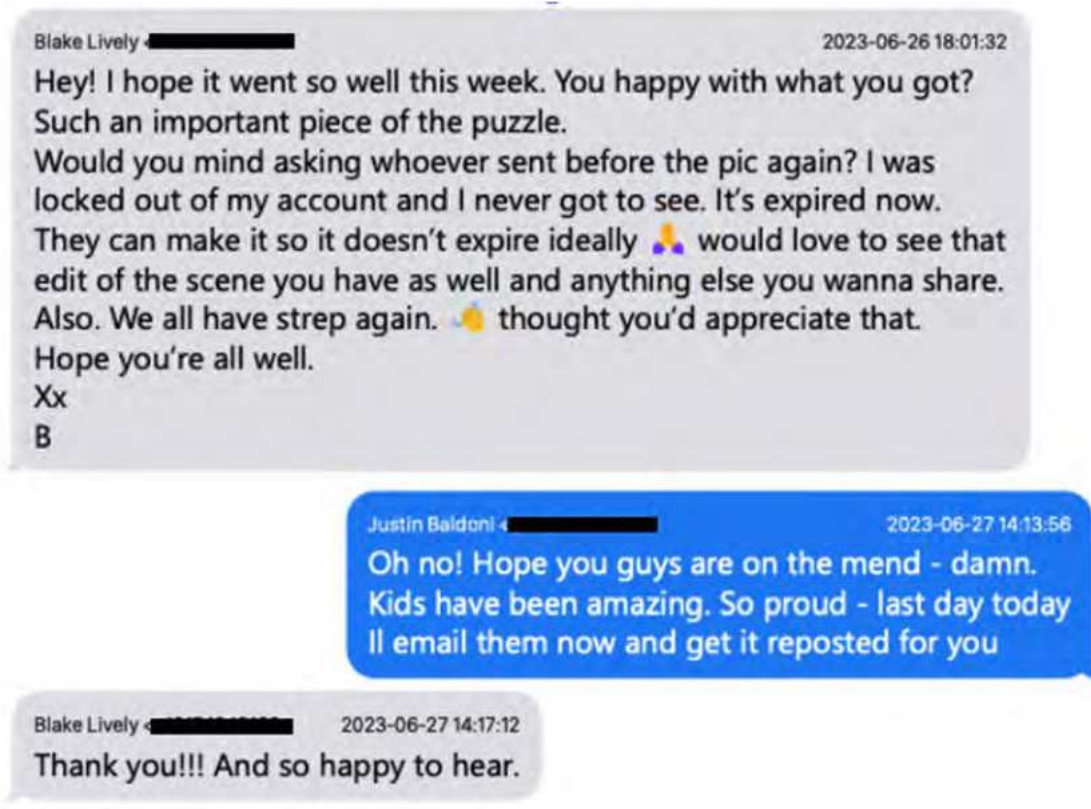
Brandon Sklenar Interview

be keeping their head about 'em and coming to work with a smile on their face and yeah, it's great. They're lovely. They're lovely people.

NOTE: Not all cast members participated in EPK interview

**June 26, 2023:** Lively checks in from London to send well wishes and request access to select scenes that Baldoni had prepared. The two co-stars remain in open communication.





**June 27, 2023:** Final day of shooting Phase 1. Production will go on hiatus until the WGA and SAG strike is resolved.

# IT ENDS WITH US.

# MAY

## 2023

### PRODUCTION NOTES

- SUN 5/7 - CAMERA TEST
- SUN 5/7 - WE WERE SICK, WE PUSHED THE CREW TRAVEL FROM MONDAY 5/8 TO TUESDAY 5/9 TO VEGAS.
- MON 5/8 - WE CANCELLED THE VEGAS SHOOT DUE TO BLAKE CANCELLED TRAVEL
- WED 5/30 - PREVIOUSLY SCHEDULED DAY 3 IN VEGAS (CANCELLED)
- THURS 5/25 - DAY 8 OF FILMING, LATE NIGHT AFTER CALL SHEET WENT OUT, BLAKE CALLED AND SAID SHE TESTED POSITIVE FOR COVID.
- FRI 5/26 - CANCELLED CALL, DAILY HIRES GOT PAID FOR 8 HOUR DAY
- MON 5/29 - HOLIDAY NO WORK, FOUND OUT AFTER 5PM THAT BLAKE WAS STILL SICK AND NOT ABLE TO WORK ON 5/30, SO WE CANCELLED 5/30
- TUES 5/30 - CANCELLED CALL, DAILY HIRES GOT PAID FOR 8 HOUR DAY
- WED 5/31 - CANCELLED CALL DAY, DAILY HIRES DID NOT GET PAID

**WAYFARER**  
AS OF 07.21.23

SUN	MON	TUE	WED	THU	FRI	SAT
30	1	2	3 CAMERA TEST	4	5	6
7 PUSH VEGAS CREW TRAVEL FROM MON 5/8 - TUES 5/9	8 VEGAS SHOOT CANCELLED	9	10 PREV SCHEDULED DAY 1 - VEGAS CANCELLED	11	12	13
14	15 START PRINCIPAL PHOTOGRAPHY DAY 1 OF FILMING	16 DAY 2 OF FILMING	17 DAY 3 OF FILMING	18 DAY 4 OF FILMING	19 DAY 5 OF FILMING	20
21	22 DAY 6 OF FILMING	23 DAY 7 OF FILMING	24 DAY 8 OF FILMING	25 DAY 9 OF FILMING BL - COVID POSITIVE	26 CANCELLED CALL DAILY HIRES GOT PAID FOR 8 HOUR DAY	27
28	29 HOLIDAY - NO WORK AFTER 5P - BLAKE STILL SICK	30 CANCELLED CALL DAILY HIRES NOT PAID FOR 8 HOUR DAY	31 CANCELLED CALL DAILY HIRES NOT PAID			

# IT ENDS WITH US.

# JUNE

## 2023

### PRODUCTION NOTES

- SAT 6/3 - ADDED 6TH DAY TO CATCH UP, DAY 12 OF FILMING
- MON 6/5 - DAY 13 OF FILMING, WGA PICKETTERS, ONLY SHOT ONE INSERT ALL DAY, CREW WOULDN'T CROSS LINE, FOUND OUT LATE NIGHT PICKETTERS WERE COMING TO SET ON 6/6 SO CANCELLED
- TUES 6/6 - CANCELLED CALL DAY, DAILY HIRES GOT PAID FOR 8 HOUR DAY
- MON 6/12 - CANCELLED CALL DAY, PICKETTERS WERE THERE AND CREW REFUSED TO WORK, DAILY HIRES DID NOT GET PAID
- TUES 6/13 - DOWN DAY, DAILY HIRES NO PAY
- WED 6/14 - DOWN DAY, DAILY HIRES NO PAY, SENT EMAIL TO CREW AT 6:47PM THAT SHOW WAS OFFICIALLY SHUTTING DOWN
- THURS 6/15 - WRAP DAY, DECIDED TO RELAUNCH PRODUCTION, VERBALLY TOLD DEPT HEADS
- FRI 6/26 - PREP DAY, SENT GREEN SCHEDULE AND ANNOUNCEMENT THAT WE ARE RE-STARTING
- WED 6/28 - PHASE 1 WRAP BEGINS

**WAYFARER**  
AS OF 07.21.23

SUN	MON	TUE	WED	THU	FRI	SAT
28	29 HOLIDAY - NO WORK AFTER 5P - BLAKE STILL SICK	30 CANCELLED CALL DAILY HIRES NOT PAID FOR 8 HOUR DAY	31 CANCELLED CALL DAILY HIRES NOT PAID	1 DAY 10 OF FILMING	2 DAY 11 OF FILMING	3 TUESDAY 6TH DAY DAY 12 OF FILMING
4	5 DAY 13 OF FILMING 3 INSERT SHOT FILMING WGA PICKETTERS CREW NOT CROSS LINE	6 CANCELLED CALL DAILY HIRES NOT PAID FOR 8 HOUR DAY	7 DAY 14 OF FILMING	8 DAY 15 OF FILMING	9 DAY 16 OF FILMING	10
11	12 CANCELLED CALL PICKETTERS ON SET CREW REFUSED TO WORK DAILY HIRES NOT PAID	13 DOWN DAY DAILY HIRES NOT PAID	14 DOWN DAY DAILY HIRES NOT PAID BLAKE SHOW OFFICIALLY SHUTTING DOWN	15 SUSP DAY RELAUNCH DECIDED VERBALLY TOLD HEADS	16 PREP DAY GREEN SCHEDULE ANNOUNCEMENT OF RESTART	17
18	19 PREP DAY	20 PREP DAY	21 DAY 17 OF FILMING	22 DAY 18 OF FILMING	23 DAY 19 OF FILMING	24
25	26 DAY 20 OF FILMING	27 DAY 21 OF FILMING	28 PHASE 1 WRAP BEGINS	29	30	

**July 11, 2023:** Isabela Ferrer reaches out to Baldoni two weeks after production had wrapped to share her gratitude for the experience and “kind words about Baldoni,” and specifically thanking Baldoni for “creating such a comfortable, safe space”. Baldoni reciprocates the compliments.



**July 19, 2023:** Lively again reaches out to check in with Baldoni during the SAG strike to inquire about Baldoni's assembly cut and to request access to the dailies for a second time (her first request was on June 13, 2023). Baldoni, feeling it was "too early" to share, promises to send her cuts as soon as he is ready. 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. Baldoni did not assent to this request and said he was "excited to show [her] when [the] time is right."

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

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)

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, thats why I sent the 5 hour playlist, but at this point it's too early for me 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)

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

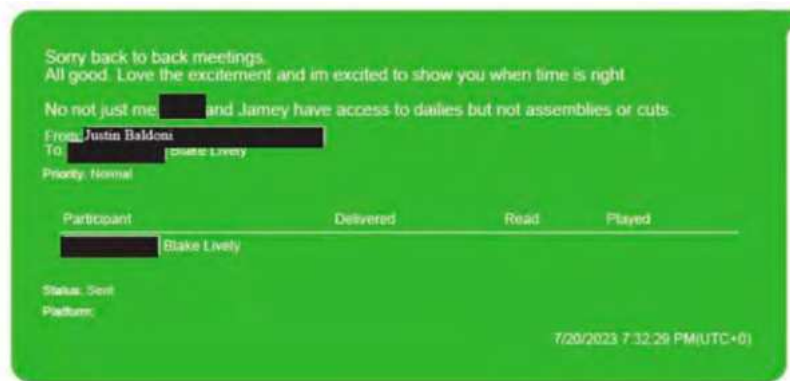
Participant	Delivered	Read	Played
Justin Baldoni	7/20/2023 5:35:23 PM(UTC+0)	7/20/2023 5:35:23 PM(UTC+0)	

Status: Read

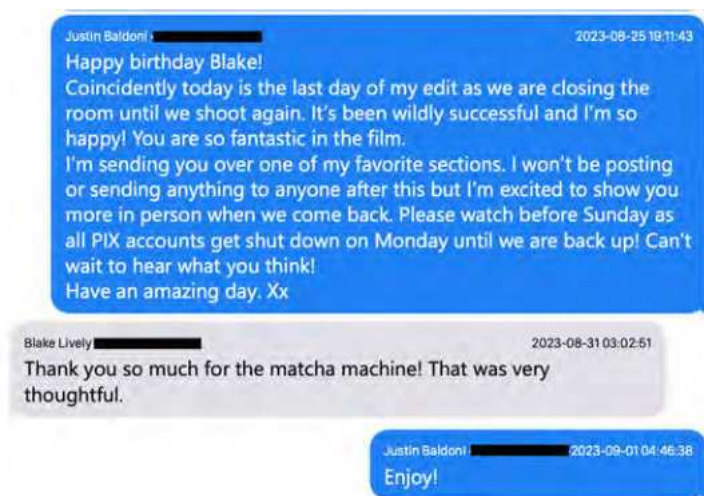
Platform:

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

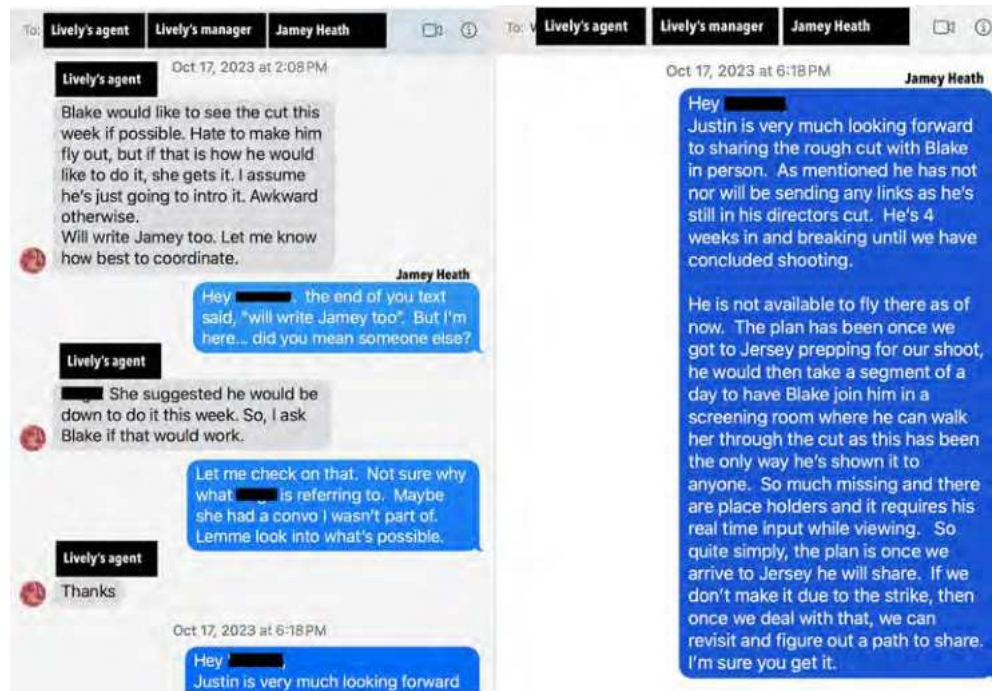




**August 25, 2023:** As promised, Baldoni reaches back out to Lively and shares with her his “favorite scenes,” expressing his excitement to show her more in person when they resume production. A day later, Lively disregards the note about the Film and instead thanks him for the Matcha machine.



**October 17, 2023:** Lively’s agent and manager reach out to Heath, requesting that Baldoni fly to New York to show Lively the assembly cut of the Film. Heath responds that Baldoni is not available to travel at that time but looks forward to showing her the rough cut when they resume production shortly.



**November 8, 2023:** In anticipation of the SAG strike ending soon, Heath reaches out to Lively's representative to share her shooting schedule, which was set to resume on November 15<sup>th</sup>.

WAYFARER

Jamey Heath

IEWU

1 message

Jamey Heath

Wed, Nov 8, 2023 at 5:21 PM

To: Lively's Agent

Here's the schedule as of now that is still being finalized.



Jamey Heath

One planet. One people. Please...

 FILE\_1590.pdf  
16K

## NOVEMBER

M	T	W	T	F	S	S
30	31	1	2	3	4	5
6	7	8	9	10	11	12
13	14	15	16	17	18	19
Costume Fitting		Costume Fitting				
20	21	22	23	24	25	26
Rehearsal	Rehearsal	Rehearsal	Thanksgiving Holiday	Thanksgiving Holiday		
27	28	29	30	1	2	3
Shoot Day 1	Shoot Day 2	Shoot Day 3	Shoot Day 4			
4	5	6	7	8	9	10

**November 9, 2023:** Heath reaches out to Lively's lawyer about "getting aligned," informing her that production was on the ground in New Jersey and eager to get started.

WAYFARER

Jamey Heath

IEWU

1 message

Jamey Heath

Thu, Nov 9, 2023 at 9:58 AM

To: Lively Attorney

Hi

Long time no speak. I hope you're well.

As you might know, we are back in jersey prepping for the last 2 weeks hoping that the strike would end. And here we are. With that, I'd love to have a chat with you about moving forward and get aligned the best we can at this stage. Can you give me a ring?

Thank you much,

Jamey



Jamey Heath

**November 9, 2023:** On the very day the SAG-AFTRA strike ended, Baldoni, the studio, and the producers were eager to resume production. However, their plans were disrupted by an unexpected email from Lively's lawyer. The email contained a 17-point list of non-negotiable conditions that Lively demanded be met before her return to work. The list, both in tone and content, appeared to insinuate—or outright allege—that Baldoni, Heath, and others had engaged in sexually inappropriate conduct during filming. These claims were entirely unfounded and a deliberate attempt to insinuate improper conduct by Baldoni and Heath, forcing them to sign as-is without objection if Lively was to resume filming.

**WAYFARER**

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

17 messages

To: Wayfarer Team

From: [REDACTED] (11)

Date: Nov 9, 2023 at 2:14 PM

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

**Protections for Return to Production**

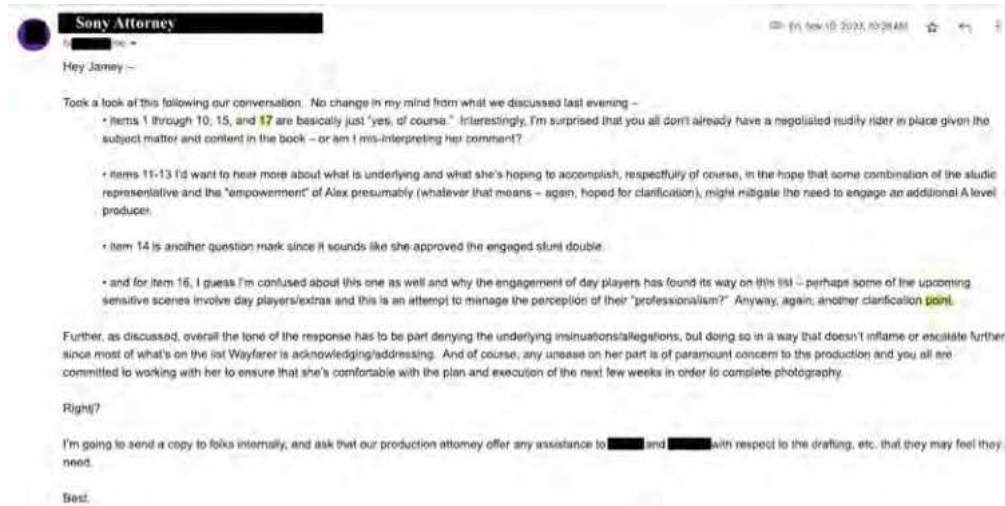
In order for Blake Lively (BL) to be able to return to production on the Film, each of the following protections must be agreed to in writing and must without fail go forward:

1. An intimacy coordinator must be present at all times when BL is on set.
2. There must be a closed set during the rehearsal or filming of any scene involving simulated sex or nudity and any observation via remote monitors shall be restricted to essential personnel as approved by BL. (to be further described in a fully-regulated, fully-executed, SAG-compliant nudity rider ("Nudity Rider").)
3. There is to be no spontaneous improvising of any scenes involving physical touching, simulated sex, or nudity. Scenes involving kissing, depictions of sexual intercourse, or any other physical touching must be contained in the screenplay (as approved by BL), choreographed in advance in the presence of the intimacy coordinator, and may only proceed as choreographed with the consent of all participants in advance.
4. Physical touching and/or costumes on BL's physical appearance must only be determined in connection with the character and scene work, not as to fit personally. Except as written into the screenplay or as strictly required to synchronize with making or costume preparation, there is to be no physical touching (including hugging) of BL, her vessel personnel and/or her employees.
5. There are to be no discussions of personal experiences with sex or nudity, including as it relates to conduct with spouses or others.
6. No one will enter, attempt to enter, interrupt, pressure, or request entrance to BL's trailer while she is in a state of undress for any reason.
7. There shall be no rehearsal or filming of any nudity and/or simulated sex without the Nudity Rider in place. Any such footage previously shot without the Nudity Rider in place, and in direct violation of SAG requirements, may not be used without BL's and her legal representatives' prior, written consent.
8. BL may have a representative of her choosing present with her on set for the remainder of the rehearsal and shooting days, including while on a closed set.
9. If BL is exposed to COVID-19, she must be provided notice as soon as possible after Wayfarer or any producer or production executive becomes aware of such exposure.
10. There shall be no retaliation of any kind against BL in any concerns about the conduct described in this letter or for these requirements. Any changes in attitude, actions, organization or other negative behavior, either on set or otherwise, including during publicity and promotional work, as a result of these requests is retaliatory and unacceptable, and will be met with immediate action.

11. Sony must have a mutually-approved representative on set for the remainder of the rehearsal and shooting days, including on a closed set, to actively supervise the production, including monitoring the safety of the cast and crew, ensuring compliance with the schedule and overseeing logistics, problem solving and creative issues.
12. Wayfarer will engage an additional, experienced A-level producer, approved by Ms. Lively, to actively supervise the production, including monitoring the safety of the cast and crew, ensuring compliance with the schedule and overseeing logistics, problem solving and creative issues.
13. Wayfarer must empower any existing third party producer with appropriate and customary authority to actively supervise the production, including monitoring the safety of the cast and crew, ensuring compliance with the schedule and overseeing logistics, problem solving and creative issues.
14. Wayfarer will engage an A-list stunt double, approved by Ms. Lively, to rehearse and perform any scenes involving the character "Lily" that depicts rape or any act of sexual violence. Ms. Lively will only perform close-up work or other pre-approved shots for such scenes.
15. Any rehearsal or shooting involving Ms. Lively, or any other performer depicting the character of "Lily," that involves nudity (including partial nudity) or simulated sex must be conducted strictly in accordance with the Nudity Rider and must adhere to the approved script.
16. Any and all day players must be engaged through customary industry talent agencies and not through personal connections of the director and/or producer.
17. Hold an all-hands, in-person meeting before production resumes which will include the director, all producers, the Sony representative, the newly-engaged third party producer, BL and BL's designated representatives to confirm and approve a plan for implementation of the above that will be adhered to for the physical and emotional safety of BL, her employees and all the cast and crew moving forward.



**November 10, 2023:** Heath contacted Sony to gather their perspective on the 17-point list of return-to-work conditions, aiming to ensure that any feedback or concerns from their team were also addressed. Sony's counsel shared their point of view, as outlined in the email below.



**November 10, 2023:** A Producer emails Heath and other members of production to notify them that Lively would be available starting December 5<sup>th</sup>. They also share that Lively would like to see new script pages and a one-liner. These demands, presented separately as the lawyers were discussing the 17-point list, had nothing to do with "safety" and appeared to be another condition before Lively would return to production. They were further addressed in an email between Wayfarer's attorney and Lively's attorney the following day.



**November 11, 2023:** Production counsel responds, seeking clarification and stating, "Wayfarer, Sony, and Production respectfully acknowledge that your client has concerns regarding safety, professionalism, and workplace culture. Although our perspective differs in many aspects, ensuring a safe environment for all involved is paramount, irrespective of differing viewpoints."

Dear [REDACTED],

Thank you for sending over the document entitled "Protections for Return to Production".

We take these concerns very seriously and look forward to resolving them.

Wayfarer, Sony and Production respectfully acknowledge that your client has concerns regarding safety, professionalism and workplace culture. Although our perspective differs in many aspects, ensuring a safe environment for all involved is paramount, irrespective of differing viewpoints. Regarding your outlined requests, we find most of them not only reasonable but also essential for the benefit of all parties involved.

A response to each of them is below:

Sincerely,

[REDACTED]

1. Agreed
2. Agreed
3. Agreed
4. Agreed
5. Agreed
6. Agreed

---

7. Agreed. (Waiting on your clarification regarding past filming)
8. Agreed.
9. Agreed.
10. Agreed.
11. Agreed without the "mutual approval" [REDACTED] from Sony has agreed to be present throughout most of the shoot, there may be times where she cannot be present due to other work obligations. In these times, she will designate another rep from Sony to fill in.
12. We cannot Agree. This request poses significant challenges for both Sony and Wayfarer due to the financial, temporal and contractual implications. We believe that the inclusion of #1 (intimacy coordinator), #8 (Professional representative), #11 (Sony's representative) and #13 (empowering any existing third-party Producer) adequately addresses the concerns raised and demonstrates our commitment in continuing to uphold these standards moving forward.
13. Agreed.
14. Agreed.
15. Agreed with the understanding there is a separate character "Young Lily" that has already been filmed with the purview of a pre-existing Heathy Rider.
16. Agreed with the understanding that the Director may choose to cast someone he may know personally and the protocol of involving Agencies will be followed.
17. Agreed.

Reserving rights.

**November 11, 2023:** While working through Lively's protection letter for her return to work, Wayfarer counsel, seeking to keep the production on track, reaches out to Lively's lawyer, agent, and manager to send over the requested production materials—a one-liner, schedule, new script pages, etc. Additionally, Wayfarer counsel sought to coordinate a time for Lively to view the rough cut (as promised), all in an effort to maintain production progress.

**WAYFARER**

Jamey Heath <[REDACTED]>

**IEWU/ Lively / Screening, Pages & Scheduling**

2 messages

**Wayfarer Counsel**

Sat, Nov 11, 2023 at 12:41 PM

To: **Lively's attorney's manager and agents**

Cc: **Producer**, Jamey Heath <[REDACTED]>

Dear [REDACTED]

In an effort to keep us on track with finishing the film, I'm writing to address what I understand to be a few things that your client needs moving forward, namely the one liner, the new pages, and seeing the rough cut of the unfinished movie.

We are prepared to send the one liner and the new pages when you give us the go ahead and just need to know the best way to get them to Ms. Lively.

As for the rough cut, we can offer to show the movie at any screening facility of Ms. Lively's choice within the New York area, preferably Company 3 as they already have the DCP and require nothing further other than scheduling. If Ms. Lively has a place that works better for her, we will accommodate but would just need some time to set up. The Director is willing to not be present if Ms. Lively prefers and would send along any notes to address the missing elements. Ms. Lively is most welcome to bring whomever she'd like to the viewing.

Please let me know when and how you'd like to proceed.

Thank you kindly,

**Wayfarer Counsel**

**Wayfarer Counsel**

Mon, Nov 13, 2023 at 12:02 PM

To: **Lively's attorney's manager and agents**

Cc: **Producer**, Jamey Heath <[REDACTED]>

Hi [REDACTED],

It has come to my attention that Ms. Lively may be in London at the moment. I wanted to let you know that Company 3 has a screening facility there. Please let me know if this would be more convenient for your client. We would be glad to arrange the screening there if preferred.

Thank you,

**Wayfarer Counsel**

**November 13, 2023:** After some back and forth with Lively's counsel, the Lively camp's response made it clear that the list was not open for negotiation.

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

**November 15, 2023:** In light of learning that Lively would not be available for a November shoot, production reworked the schedule to begin in December instead. Heath shared the director's notes, the updated schedule, and notes regarding the rough cut with Lively's agent.

#### IEWU Green Pages and Doc.

2 messages

Jamey Heath Wed, Nov 15, 2023 at 6:35 PM  
 To: [REDACTED]  
 Cc: Lively's Agent [REDACTED]

Hi [REDACTED], here are the Green Pages as well as a bullet point summary of the changes. Also, here is the shoot schedule that we are working off of in order to shoot before the holiday break and finish in Jan.

All the best,  
 Jamey



Jamey Heath [REDACTED]

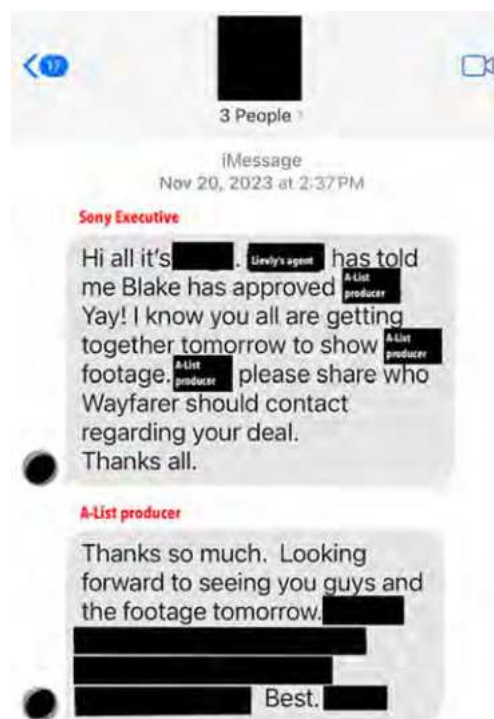
#### 3 attachments

- 1 Notes for IEWU 3 week directors cut screening.pdf  
57K
- 2 R Ends With Us - Green -10 -31 -23.pdf  
1302K
- 3 BL dates 11:15.pdf  
48K





**November 20, 2023:** A Sony executive notifies Wayfarer that Lively has approved the A-list producer and introduces him to Baldoni and Heath.



**November 22, 2023:** Despite working around the clock to meet the December 11<sup>th</sup> shoot date, Lively was ultimately unavailable, and production was once again rescheduled to start in January. The production office was notified, shut down, and set to resume in mid-January.

**IEWU - Production Update - 11.22.23**

1 message

**It Ends With Us** - [REDACTED]

Wed, Nov 22, 2023 at 7:41 AM

Reply-To: [REDACTED]

To: Jamey Heath [REDACTED]

Hi All,

Production will be resuming early January, not on 12/11/23 as previously communicated. We will most likely be tech scouting and holding the production meeting during the week of Dec 18th - 22nd. Please enjoy your Thanksgiving, and we'll send more info soon.

Thanks

[REDACTED]  
Production Secretary

**December 27, 2023:** Baldoni emailed his team of producers with notes on his revised script, expressing sadness and frustration over Lively's takeover of a Film they had spent years developing, writing, and funding. Having no energy left to fight, he reluctantly declared he "[was] waiving the white flag and submitting" and would give Lively "98% of what she wants." He also conveyed serious concern over handling the intimacy scenes, given the accusations inherent in Lively's Return to Production Demands. Baldoni asked his producing partners for guidance, stating he was rightfully afraid that "something innocuous or not to [Lively's] standards would very likely be used against [him] (as it already had)," adding that "creativity is impossible in an environment shrouded by fear." A producer responded, thanking him for his "thoughtful breakdown,... especially considering the circumstances."

# WAYFARER

Jamey Heath <jamey@wayfarersstudios.com>

## 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.

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

**December 28, 2023:** Lively emails Baldoni to request a meeting at her apartment with him and the team ahead of the start of production on January 4, 2023.



**January 4, 2024:** Baldoni, Heath, a Sony executive, a producer, the “A-list producer,” and the Film’s 1<sup>st</sup> AD met at Lively and Reynolds’ New York apartment ahead of the scheduled production restart on January 4, 2024. The team arrived prepared, with production binders in hand, eager to kick off the next phase of filming. However, Lively had different intentions for the meeting. She began by reading from notes on her phone, outlining a series of alleged infractions from Phase 1. Reynolds then berated Baldoni, demanding Baldoni apologize to Lively for actions that had either never occurred or had been grossly mischaracterized. Baldoni resisted apologizing for things he had not done, which further enraged Reynolds. Everyone, including the new producer Lively had requested to join the production and the Sony representative, left the meeting in shock. The new A-list producer remarked that, in their 40-year career, they had never seen anyone spoken to in such a manner during a meeting. Later, the Sony representative shared that they often reflected on the meeting and regretted not intervening to stop Reynolds’ tirade against Baldoni.

**IMPORTANT NOTE:** Though Lively’s CRD Complaint misleadingly suggests that the parties agreed to a list of 30 items during this meeting, many of the items listed in her Complaint were entirely new, baseless, and never presented or discussed. The only document ever shared with the parties was the 17-point Return to Production Demands, which had been introduced on November 9, 2023.



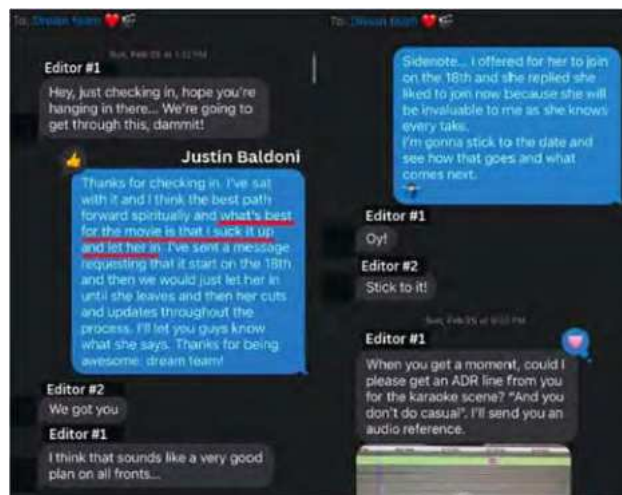
**January 5, 2024:** From January 5 to February 9, 2024, as Lively admits, filming concluded without any further grievances from Lively or references to previous disputes: “The parties agreed to implement and follow the Protections for Return to Production to ensure that the Film could be completed, 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.”

**February 22, 2024:** Baldoni starts his first day back in the edit bay with his two editors.

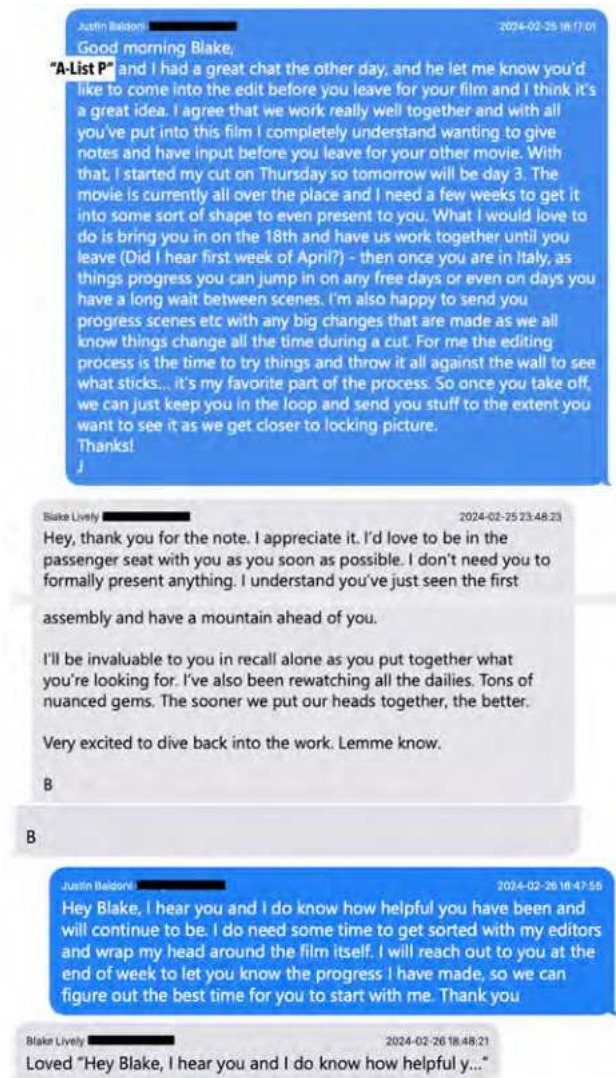
**February 24, 2024:** Heath and Baldoni are informed of Lively's request, made through the “A-list producer,” to join Baldoni in the editing bay. She also expressed that she had limited time before leaving to shoot her next Film in April. If she could not be involved in the edit with Baldoni, *she could not promise to promote the Film*. In doing so, Lively knowingly infringed on Baldoni’s DGA-protected editing time.

**February 25, 2024:** Baldoni sends a group text to Lively and the “A-list producer” to inform her that he still needs a couple of weeks to get the Film into a presentable shape. He proposes having Lively join the editing process during the week of March 18, 2024. Lively responds that she would like to be in the “passenger seat” with him and wants to get started as soon as possible.

**February 25, 2024:** Baldoni sends a text to his editors to inform them of the situation.



**February 26, 2024:** Baldoni responds to Lively’s request to be in the “passenger seat.” Despite her infringement of his DGA-protected time, and met with Lively’s threats, Baldoni let her know that he will reach out at the end of the week to update her on the progress, still attempting to be encouraging in order to keep her happy.

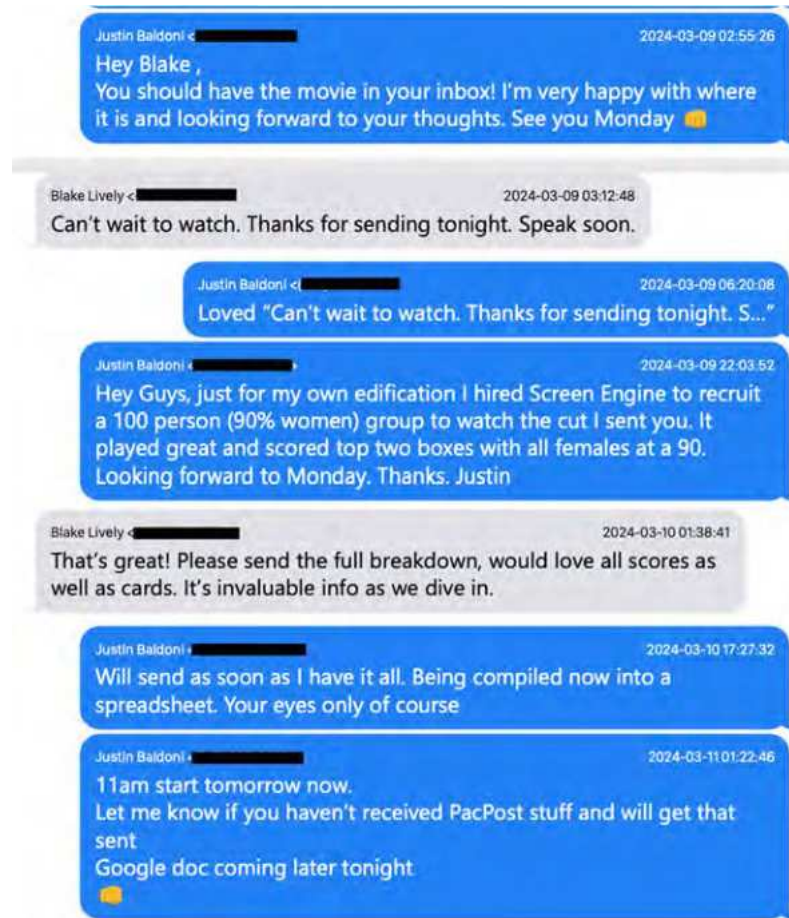


**February 28, 2024:** Baldoni and Heath connect with a senior Sony marketing executive to determine the best path forward with Lively regarding her desire to be involved in the edit and how they can all stay aligned. After the call, the Sony executive expresses to Baldoni, "We are all in it with you – at the end of this pain is a BIG WIN!!!"

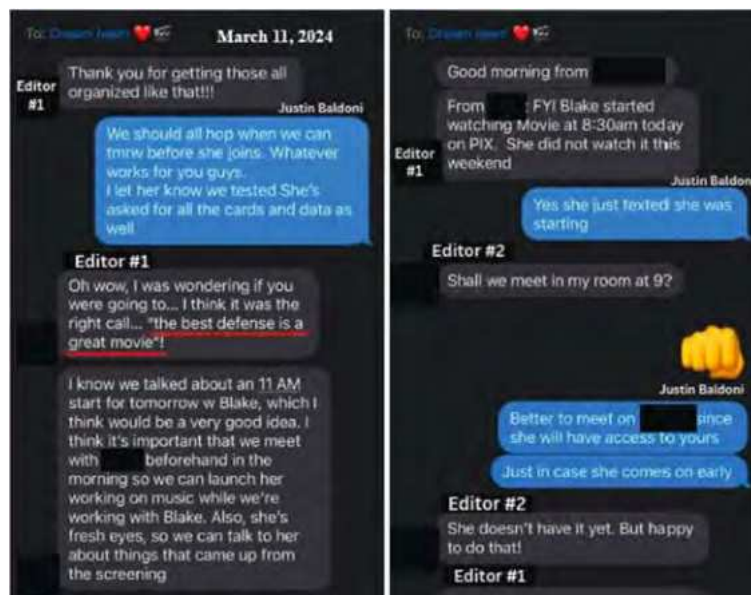


**March 8, 2024:** Baldoni and Wayfarer enlist Screen Engine to recruit a 100-person group (90% female) to watch the current cut and provide feedback. Baldoni uses these results to further refine his director's cut. He shares the results and scorecards with Lively ahead of their planned collaboration in the edit. **Note:** This is not an "official" audience test screening.

**March 9, 2024:** Baldoni shares the assembly cut of the Film with Lively and informs her about the mini-audience test screening.

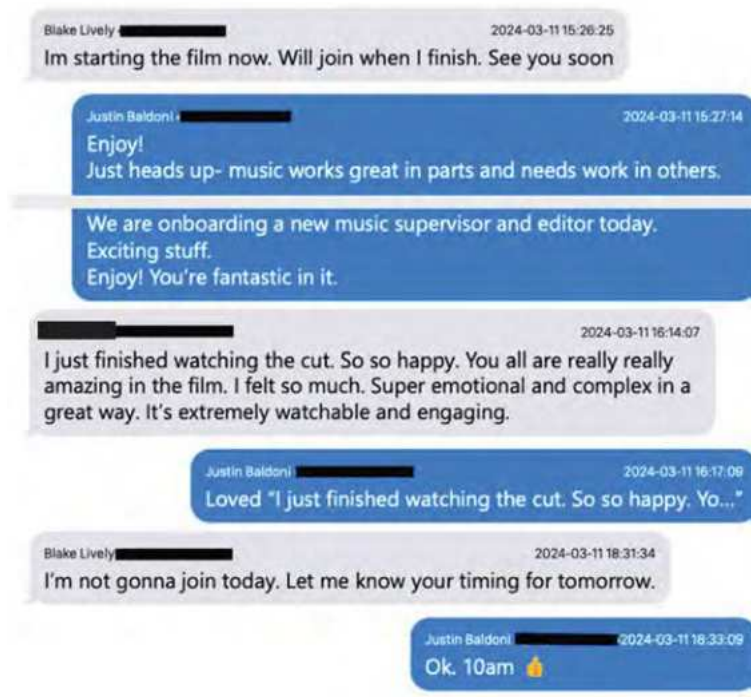


**March 11, 2024:** Baldoni texts with his editors.



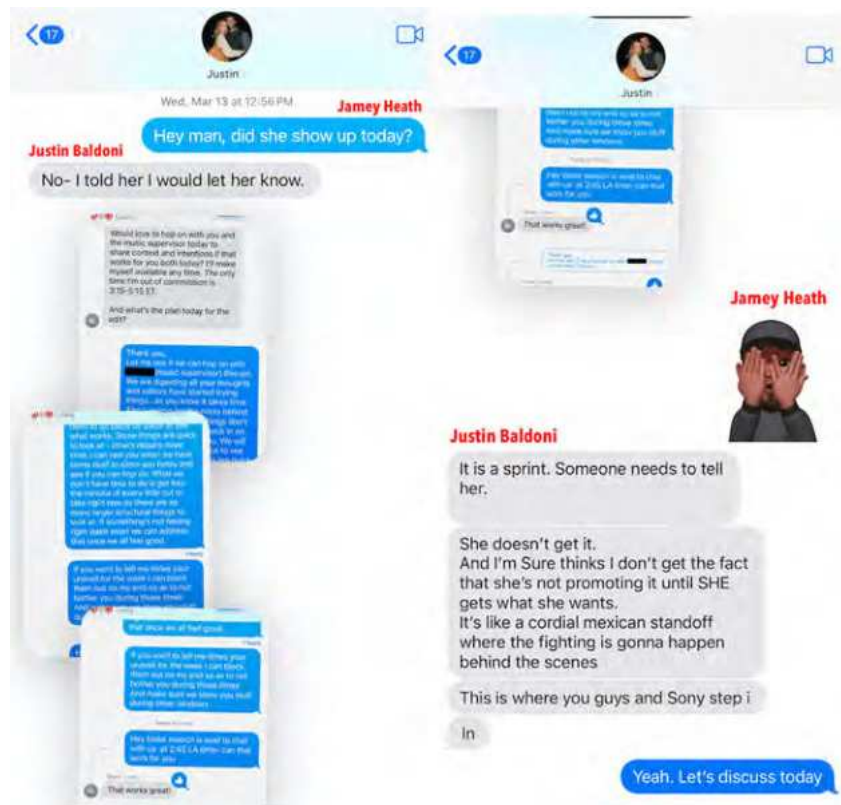


**March 11, 2024:** Lively watches the WIP assembly cut and informs Baldoni and the “A-list producer” via text that she will not be joining the edit today but will instead join the following day.

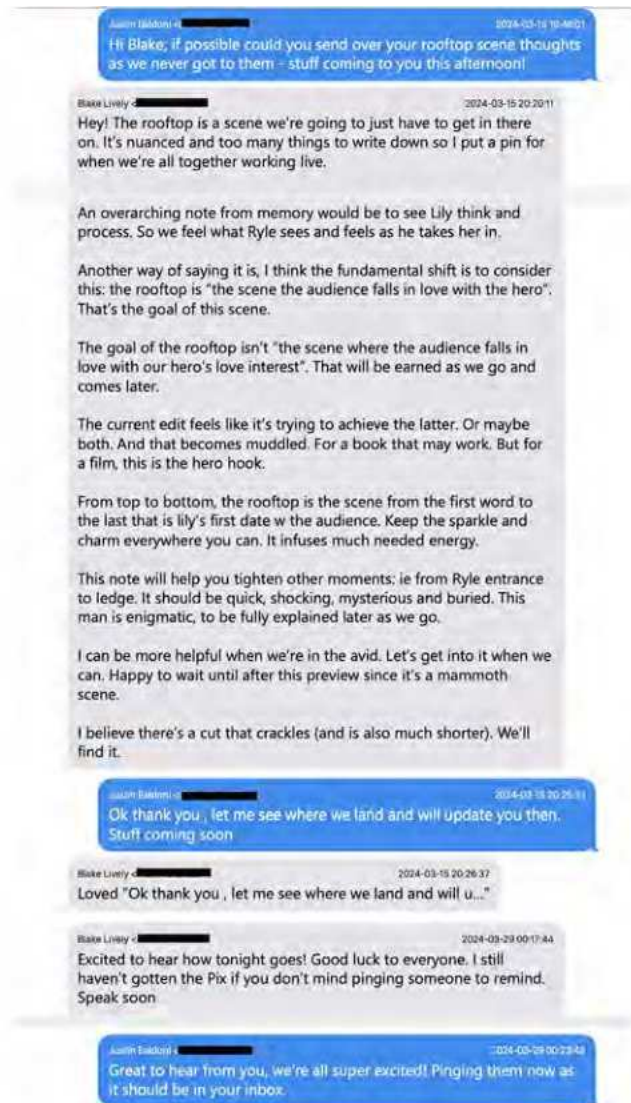


**March 12, 2024:** Lively joins the edit with Baldoni and his editors. She shares seven pages of notes, which Baldoni and the editors spend hours implementing, despite Baldoni not agreeing with all of them.

**March 13, 2024:** Despite sharing seven pages of notes and requiring Baldoni and the editors incorporate them, Lively did not show up for Day #2 in the edit with Baldoni. Heath checks in with Baldoni via text, and Baldoni shares the following.



**March 15, 2024:** Baldoni, keeping in mind Lively's threat to not promote the Film continues to encourage Lively to share thoughts with him and the editors while keeping her updated on progress all in an effort to keep her happy. In the text he also shares a comprehensive working update of the Film based on the notes Lively provided.



# WAYFARER

Justin Baldoni

## WIP updates on the week!

4 messages

Justin Baldoni

Fri, Mar 15, 2024 at 7:01 PM

To: [redacted]

Hey Blake,  
Below you will find a comprehensive working update on everything we have been working on since we got your notes Tuesday. Some links should have come to you by now, others will come Monday. Please note that not everything below is coming to you via PIX, just the bigger things. More larger chunks will come Monday as we are still cutting in music/score.  
I'm really happy and excited with how this is shaping up! Have a great weekend.  
Justin

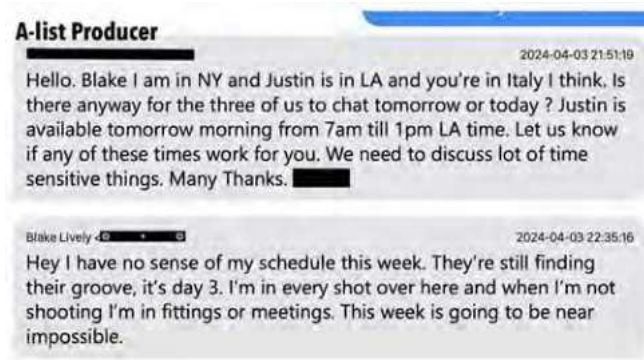
1- Opening.  
Trimmed considerably.

**April 3, 2024:** Sony informs Wayfarer that Lively has escalated her demands, now requesting solo time in the editing suite with her own editor—a shocking and unprecedented overreach. To

make matters worse, Wayfarer is told that Lively has made it clear that she will not promote the Film unless this demand is met, knowing the failure of the lead actress to promote the Film would be detrimental. This maneuver felt less like a professional request and more like extortion, holding the Film's marketing efforts hostage to gain creative control. Wayfarer is left with no choice but to agree.

The gravity of allowing her access to the edit—a process typically reserved for the director and post-production team—is not lost on Wayfarer. It undermines the creative integrity of the project and sets a troubling precedent, all while amplifying tensions between Lively and the team.

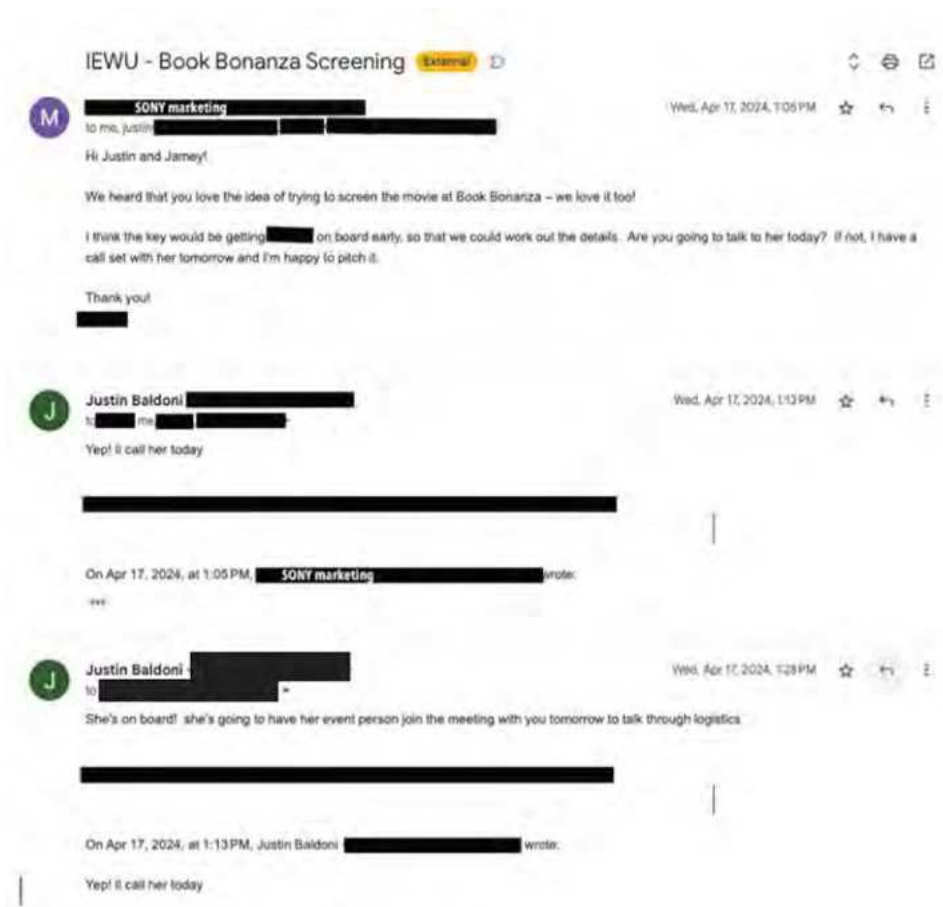
**April 4, 2024:** The A-list producer reaches out to Lively and Baldoni in a group text to request that the three of them jump on a call to discuss "time sensitive things." Lively is not available this week to speak with Baldoni and the A-list producer and ultimately did not speak to Baldoni directly about her demands.



**April 4, 2024:** Faced with yet another unprecedented demand from Lively—to edit the Film on her own with her own editor—Wayfarer finds itself with no choice but to assent (yet again). Wayfarer is forced to balance the need to keep the production on track with managing Lively's increasingly audacious requests. Wayfarer reluctantly agrees to grant Lively 10 days in the editing room with her personal editor, with the understanding that her ideas will ultimately be incorporated into Baldoni's director's cut. This concession reflects Wayfarer's continued effort to maintain progress while navigating an exceptionally challenging situation. With each "ask," Lively makes it plainly known that if she is not given what she wants, she will not promote the Film at all.

**April 17, 2024:** Sony marketing and Baldoni coordinate efforts to have Baldoni attend Book Bonanza and show audiences a surprise early screening of the Film.

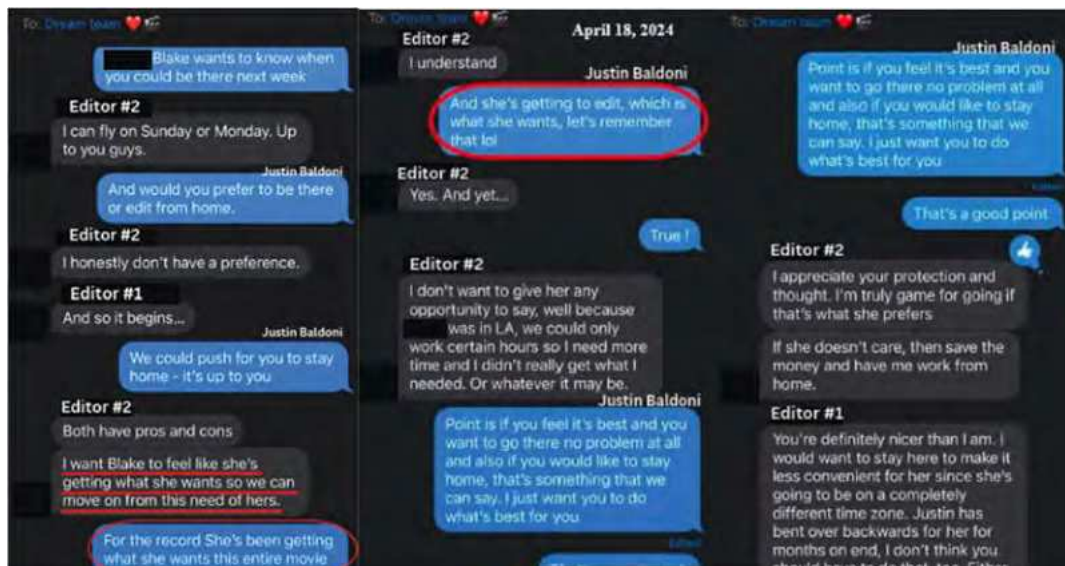


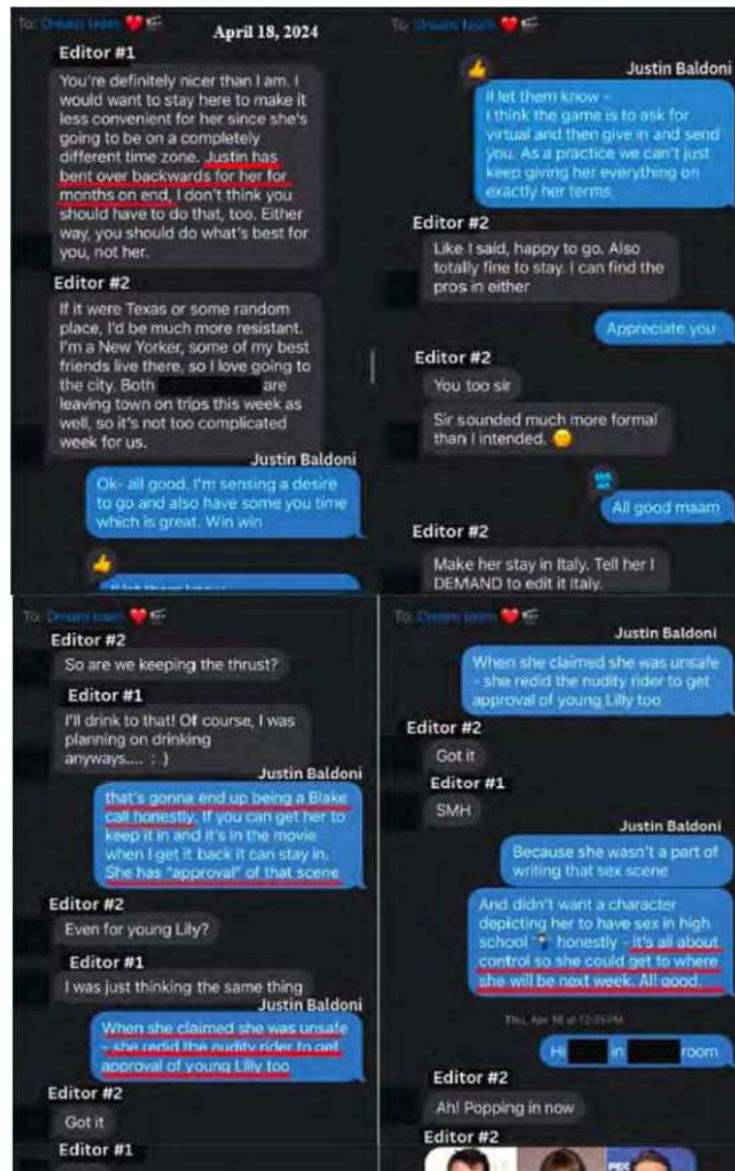


**April 18, 2024:** In a group text involving an A-list producer, a Sony executive, Baldoni, and Heath, the team discusses the possibility of sending Baldoni's editor to New York (since Lively's preferred editor was not available). Heath emphasizes the importance of clarifying that, while Baldoni had agreed to allow her into the editing process, it should not, under any circumstances, be interpreted as his endorsement of the idea. Baldoni's agreement was purely a concession to move forward, not a reflection of his confidence in or approval of the decision.

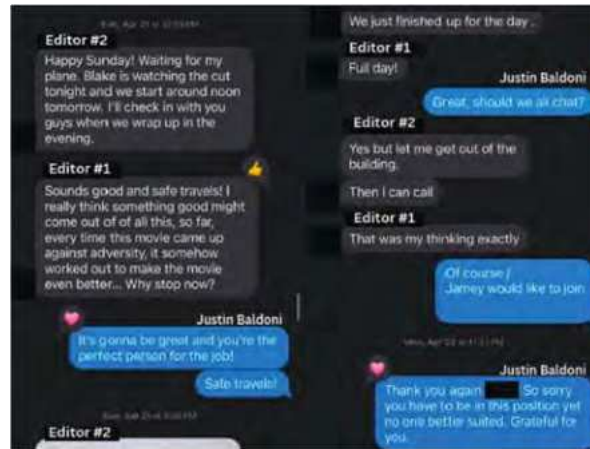


**April 18, 2024:** Below are texts between Baldoni and his editors discussing whether to have one editor fly to New York and work with Lively in person or remotely. Ultimately, it is decided to fly the editor out, as the editor stated, “I want Blake to feel like she’s getting what she wants so we can move on from this need of hers.”

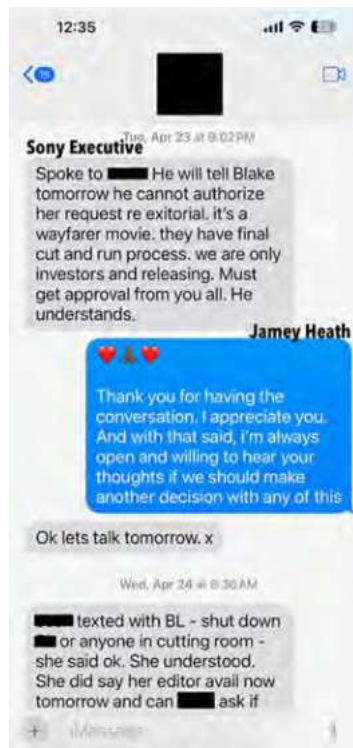




**April 22-May 1, 2024:** Lively and the editor work on her cut of the Film at Wayfarer and Sony's expense. In the meantime, Baldoni continues cutting his version of the Film, all the while believing that he will have the opportunity to consider incorporating Lively's edits at a later date.



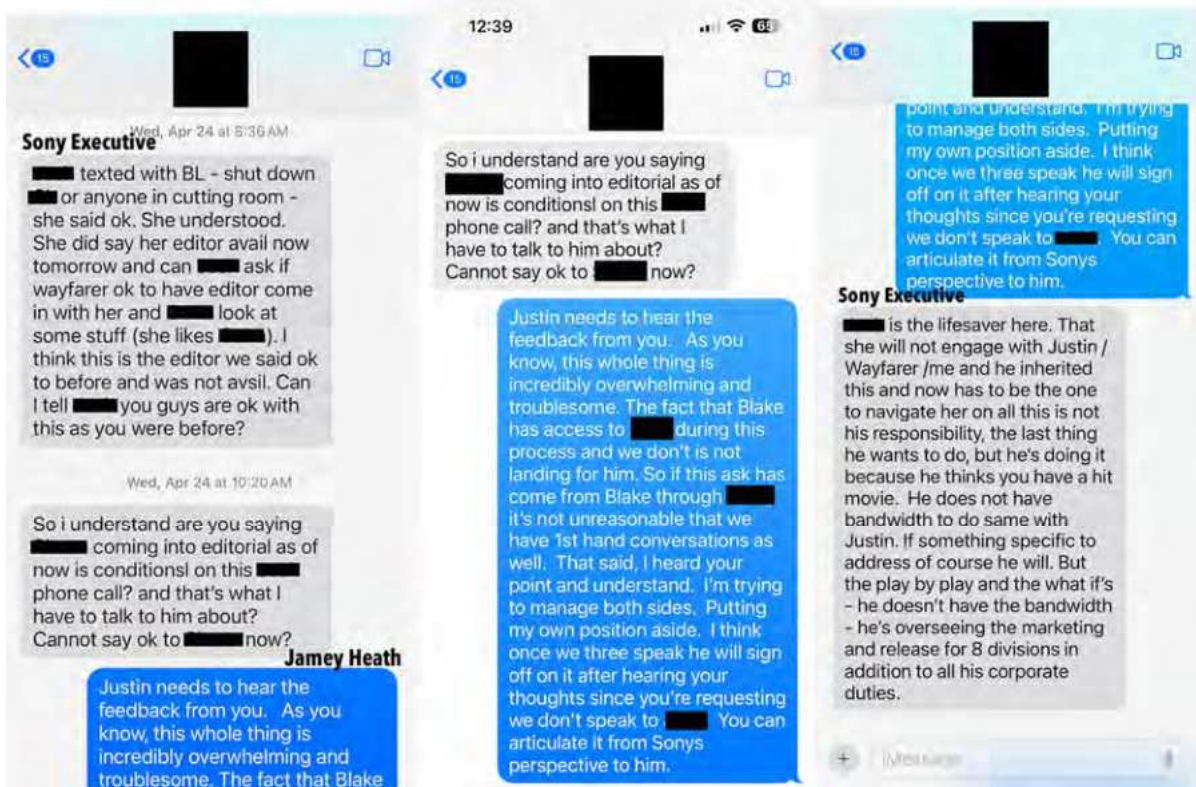
**April 23, 2024:** Jamey Heath learns that Lively asked Sony to bring other creative collaborators into the cutting room with her. In response, a Sony executive relayed a firm message to Lively, stating, “This is a Wayfarer movie. Wayfarer has Final Cut and runs the process.” Sony is an investor and distributor. The Sony executive hoped to reiterate that Lively needed Wayfarer’s approval for any such involvement, reinforcing the boundaries of her creative role.



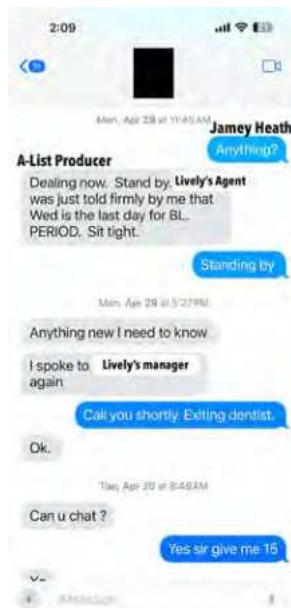
**April 24, 2024:** On the same day, a Sony executive informs Heath that Sony is holding firm in refusing Lively’s request to bring others into the cutting room. Heath conveys Baldoni’s growing frustration, noting that while Sony appeared to bend over backward to accommodate Lively’s demands, they do not extend the same courtesy to him as the director. In response, the Sony executive acknowledged the imbalance and admitted that this was not a situation anyone at Sony



had anticipated or wanted to be in, underscoring the complexity and strain of managing the escalating tensions.

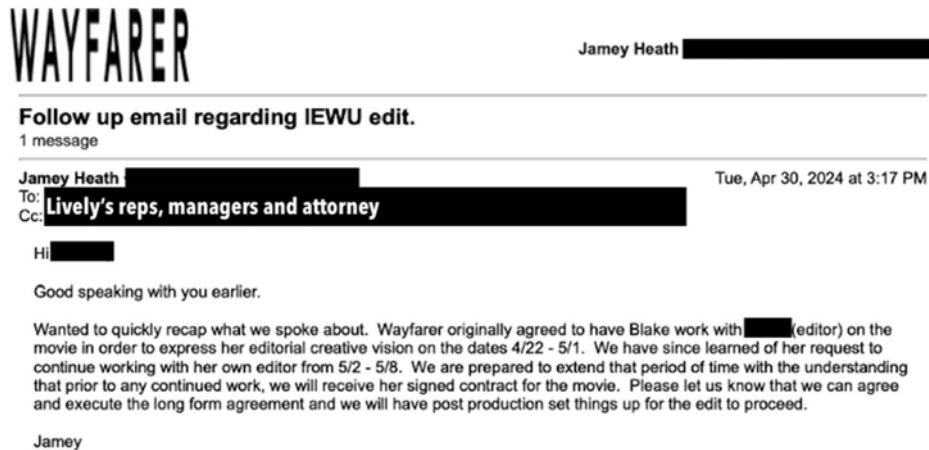


**April 29, 2024:** Heath and Wayfarer, eager to get the Film back from Lively, ask the A-list producer to make it clear to Lively's agent that Wednesday, May 1<sup>st</sup>, would be her last day in the edit.

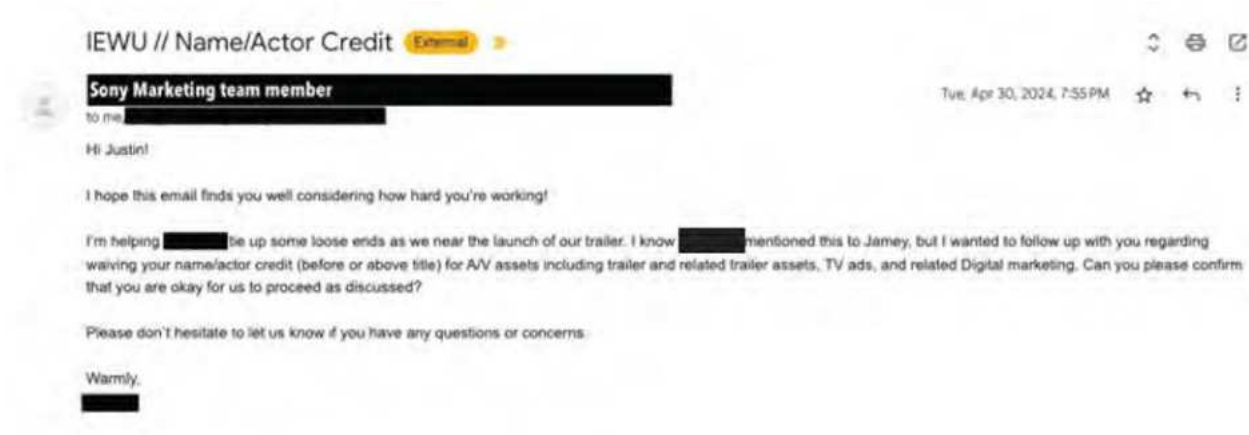


**April 30, 2024:** Still unsatisfied, Lively demands another extension of her time in the cutting room, pushing the deadline from May 1<sup>st</sup> to May 8<sup>th</sup>. Adding to the audacity, Lively insists that Sony and Wayfarer hire her personal editor—someone she had worked with previously, most notably on projects with Reynolds. Faced with this escalating situation, Wayfarer considers granting the extension but attaches a significant condition: Lively would need to sign her long-overdue acting agreement. This document, which had been left unsigned for over a year, would prevent Lively from continuing to leverage her promotional participation as a bargaining tool. Wayfarer’s attorneys had been tirelessly trying to secure her signature, and this moment represented a pivotal opportunity to resolve the standoff.

Heath clearly communicates Wayfarer’s position in an email to Lively’s representative, hoping to bring an end to the ongoing impasse while protecting the integrity of the production.

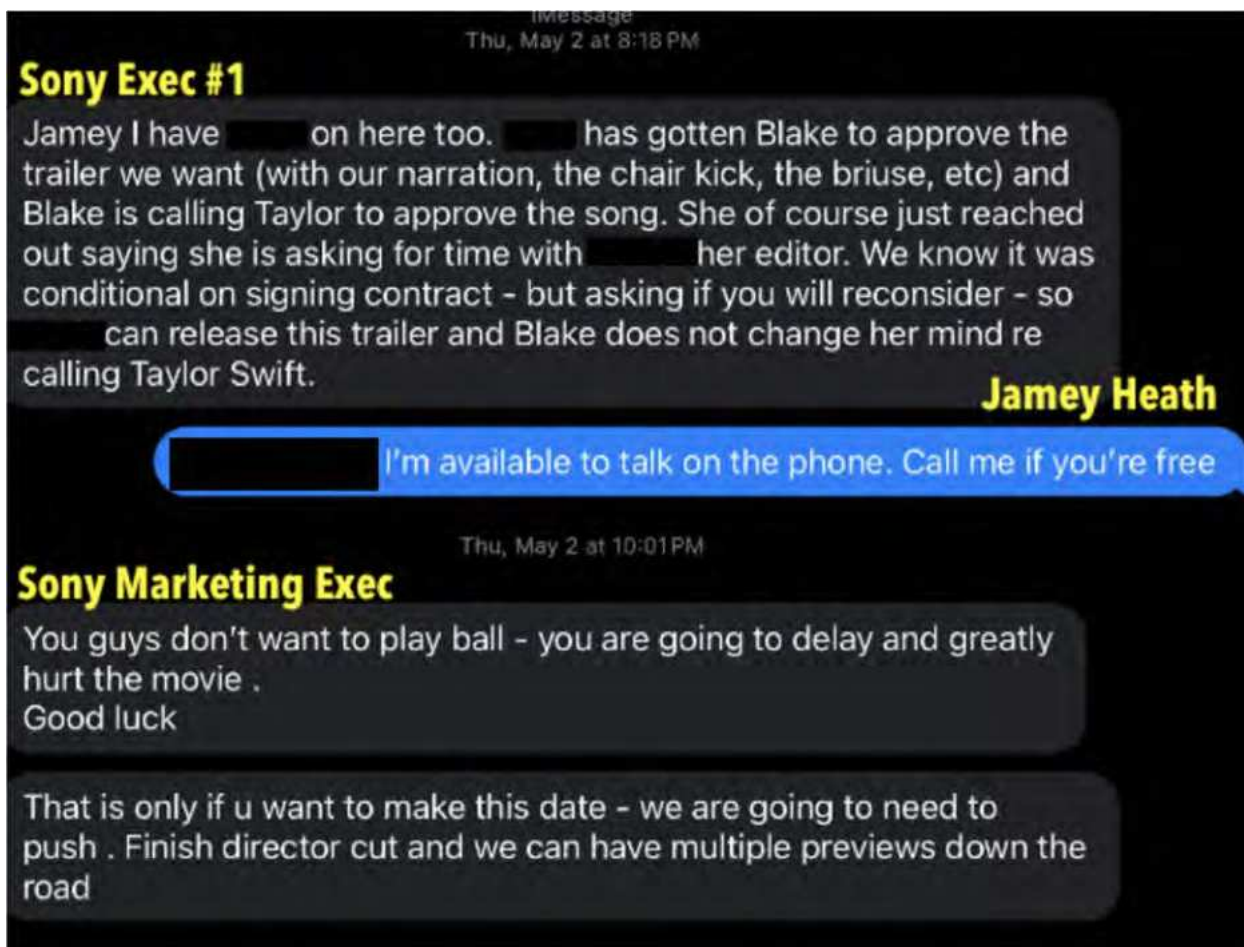


**April 30, 2024:** Heath is informed that Lively had told Sony Marketing that she would refuse to approve trailers, TV spots, and digital marketing assets if Baldoni's acting credit appeared alongside hers. Sony Marketing, citing Lively's contractual approval rights over her image and likeness in promotional materials, warns Heath that she could effectively block the release of almost every piece of promotional content featuring her face or name—essentially all of it. Faced with this leverage, Baldoni and Wayfarer reluctantly agree to remove his name from the “before or above title” credit in trailers and related marketing cutdowns. This concession is yet another clear example of Lively’s ongoing effort to diminish Baldoni's presence and influence on the project. There is no creative or professional justification for his name to be excluded; it is purely a result of her demands. The situation escalates further when, on June 18, 2024, Sony requests that Baldoni’s “Film by” credit be removed from the Film’s poster—a move that reinforces Lively’s wholesale erasure of his contributions, as a request of this nature would have no meaning to Sony; it is clearly instigated by Lively.



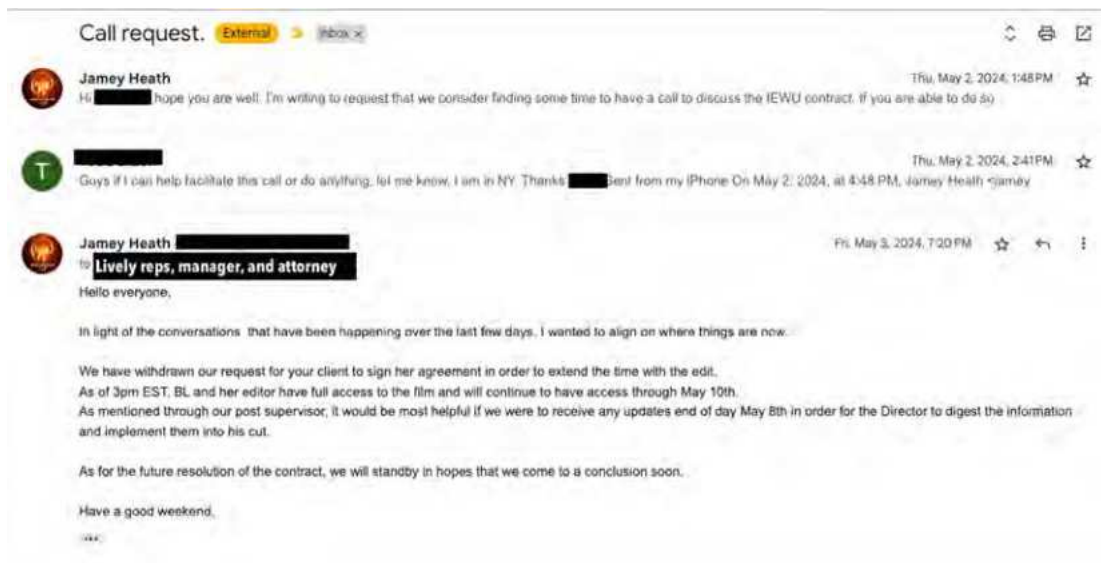
**May 2, 2024:** While Lively is holding the Film hostage in the edit room, she is simultaneously stalling the Film’s marketing by refusing to approve key materials, including the trailer release. With less than three months until the Film’s premiere, Sony becomes increasingly alarmed about the delayed rollout of the trailer, a cornerstone of the promotional campaign. In a text exchange between Heath, a Sony Film executive, and a Sony marketing executive—who had just spoken with Lively—they inform Heath of Lively’s still escalating demands: Lively will not approve the trailer release unless she is granted more time in the edit room with her personal editor. Adding to the pressure, Lively made a veiled threat, implying she might “change her mind” about reaching out to Taylor Swift to secure the use of “My Tears Ricochet” for the trailer if her demands are not met.

When Heath stands firm and refuses to acquiesce, the Sony marketing executive delivers a sharp and pointed warning: “You don’t want to play ball—you are going to delay and greatly hurt the movie. Good luck.” This stark response signals that Sony, too, was beginning to apply pressure on Wayfarer, effectively strong-arming them into compliance. The message makes it clear that the studio is growing increasingly frustrated with the situation and is prepared to hold Wayfarer accountable for any negative fallout, adding yet another layer of tension to an already fraught dynamic.



**May 3, 2024:** Faced with Lively's escalating threats—ranging from potentially delaying the Film's release to outright refusing to promote it—Wayfarer, once again, reluctantly conceded to her demands, allowing her to continue editing with her personal editor. Further, they withdrew their reasonable request for Lively to sign her long-overdue contract, opting instead to focus on maintaining forward momentum. Wayfarer's only request was that Lively provide updates by the end of the day on May 8, 2024, allowing the director sufficient time to review and incorporate her edits into his cut. Despite the mounting tensions, Baldoni, Wayfarer, and Sony held on to the belief that Lively's contributions would ultimately be integrated into Baldoni's vision for the Film, preserving the integrity of the final product.





**May 6, 2024:** Baldoni and Colleen Hoover host a trailer launch event at the Sony Studio lot and shoot promotional content in support of the Film.



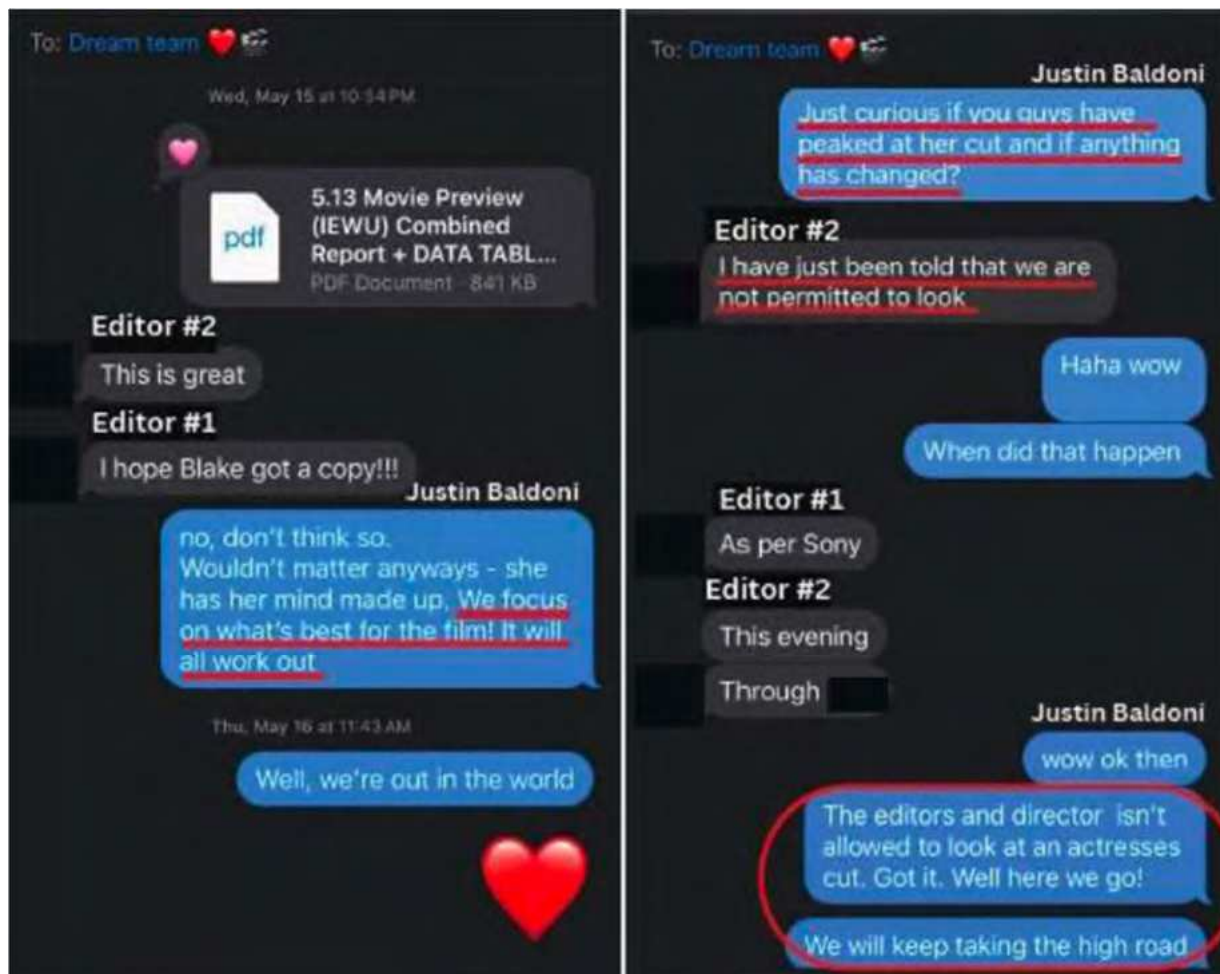


**May 10, 2024:** On the final day on which she is approved to edit the Film, Lively refuses to turn over her cut to the Film’s director and instead tells Sony that she wants to do a “friends and family” screening of her cut to gather feedback and *continue* working on her edit. This was of course at Wayfarer and Sony’s expense and not accounted for in the budget.

**May 13, 2024:** Sony and Wayfarer do an official audience test screening of Baldoni’s cut in Aliso Viejo CA. The Film scores **94%** with females under 35, the Film’s primary target audience. Both Sony and Wayfarer are ecstatic about this score.

screen engine/asi COMPARISON SHEET				MOVIE PREVIEW				
				TOTALS	MALES	FEMALES		THEATRICAL TARGETS
						Under 35	35 & Over	
RATINGS								
EXCELLENT								
5.13.24	It Ends With Us	Aliso Viejo, CA		56%	39%	62%	63%	66%
VERY GOOD								
5.13.24	It Ends With Us	Aliso Viejo, CA		29%	34%		21%	27%
TOTAL POSITIVE								
JB Cut → 5.13.24	It Ends With Us	Aliso Viejo, CA		85%	73%	94%	84%	93%
RECOMMENDATIONS								
YES, DEFINITELY								
5.13.24	It Ends With Us	Aliso Viejo, CA		66%	48%	74%	74%	83%

**May 15, 2024:** Baldoni shares the official audience test screening scores with his editors.



**May 16, 2024:** The trailer for the Film is released to the world.

**May 18, 2024:** Lively hosts a “friends and family” screening of her cut in New York. She does not share any audience feedback with Baldoni or the studios.

May 2024

*"IT ENDS WITH US" 29 Wk Post 5/15/24 DRAFT ONLY*

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday																																																																																											
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**May 20, 2024:** Wayfarer is informed through Sony that Lively, emboldened by the feedback she received from her friends and family screening, demanded an official audience test screening of her version of the Film. In light of Lively's threat to withhold promotion of the Film, as well as her barely 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.

**May 30, 2024:** Sony and Wayfarer held an official audience test screening of Lively's cut in Aliso Viejo, CA. The results revealed that Lively's cut scored an 82% approval rating with females under 35—12 points lower than Baldoni's version (94%). That same evening, a senior Sony marketing executive contacted Lively to discuss the scores. Instead of honoring her original promise, Lively rescinded it, doubling down on her refusal to promote Baldoni's cut, regardless of its stronger audience performance. To make matters worse, Lively further asserted that Colleen Hoover would also refuse to promote the Film unless Lively's cut was released. This claim was deeply disheartening, as the longstanding relationship between Colleen Hoover, Baldoni, and Heath had been one of mutual respect, trust, and admiration.



screen engine/asi COMPARISON SHEET			MOVIE PREVIEW				
			TOTALS	MALES	FEMALES		THEATRICAL TARGETS
Under 35	35 & Over						
RATINGS							
EXCELLENT							
5.30.24	It Ends With Us	Aliso Viejo, CA	48%	42%	41%	63%	66%
5.13.24	It Ends With Us	Aliso Viejo, CA	56%	39%	62%	63%	66%
VERY GOOD							
5.30.24	It Ends With Us	Aliso Viejo, CA	35%	32%	41%	29%	27%
5.13.24	It Ends With Us	Aliso Viejo, CA	29%	34%	32%	21%	27%
TOTAL POSITIVE							
BL Cut → 5.30.24	It Ends With Us	Aliso Viejo, CA	83%	74%	82%	92%	93%
JB Cut → 5.13.24	It Ends With Us	Aliso Viejo, CA	85%	73%	94%	84%	93%
RECOMMENDATIONS							
YES, DEFINITELY							
5.30.24	It Ends With Us	Aliso Viejo, CA	62%	51%	59%	78%	83%
5.13.24	It Ends With Us	Aliso Viejo, CA	66%	48%	74%	74%	83%

**June 2, 2024:** Once again, Wayfarer found itself with no choice but to allow Lively to continue her edit, effectively sidelined to sharing notes with Lively and her editor—without any assurance that those notes would even be considered. In a careful attempt to navigate the situation, Heath compiled Wayfarer's collective feedback, including Baldoni's input, and shared it with Sony, hoping it might be relayed to Lively.

By this point, it had become painfully clear to Baldoni and the Wayfarer team that Lively was determined to assume full creative control from the director, the financier, and the studio behind the picture. Her campaign to marginalize Baldoni's role in finishing the Film had proven devastatingly effective, leaving him and the team devastated and frustrated. Despite everything, Baldoni and Wayfarer remained hopeful that the Film's release and success would make it all worth it and remained focused on the goal of completing a Film that could have impact.

WAYFARER

Jamey Heath [REDACTED]

**Notes from Editorial Team for Blake and editor to consider.**

2 messages

Jamey Heath [REDACTED]

Sun, Jun 2, 2024 at 9:50 PM

To: Sony Representative [REDACTED]

Cc: Sony Representative [REDACTED]

Producer [REDACTED]

Bcc: [REDACTED]

As discussed, The team has gone through Blakes last edit and have the following notes for [REDACTED] and Blake to consider. We'd like this to be presented to them in the spirit of wanting to share notes and thoughts in efforts to achieve the same goal which is to make the movie the best it can be. They may choose not to respond to them, but at least if you can assure us that they will be delivered, we can hope that some of them are considered. Not sure how you wish to deliver, whether through [REDACTED] Sony Representative but I beleive there is nothing lost in sending them over. Who knows, maybe they are able to appreciate them since they too want to deliver the best version and get the scores that we can all be happy about.

Please let me know, you've received them and when and how they will be sent.

Thank you!  
Jamey

**June 3, 2024:** Baldoni is informed that Lively would be attending Book Bonanza with Hoover instead of Baldoni. Jennifer Abel (Baldoni's publicist at Jonesworks) and Baldoni share a text exchange disheartened at how things have unfolded.

Jen Abel

Mon, Jun 3 at 6:04 PM

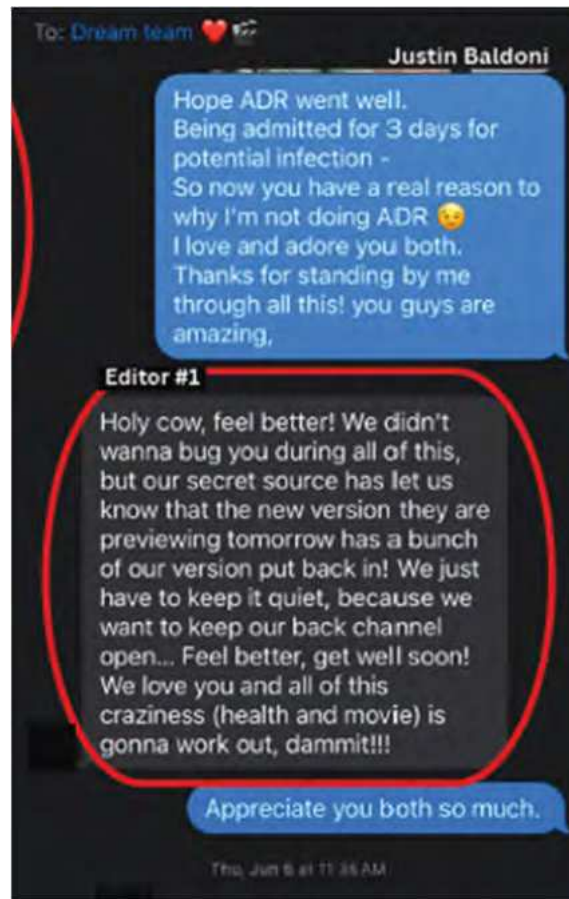
Hi— Jamey just filled me in about bookcon. I know this is devastating and such a kick in the gut. It's petty and childish at this point. I'm just making sure you're ok... we will get through this. Eye on the prize, her attending bookcon is a win for the film ultimately. And if she wants to drag her ass to Texas then let her. You can be home with your family which is important. ❤️

Mon, Jun 3 at 8:48 PM


Justin Baldoni

She's kicked me out officially from the film now. She's finishing it all. I can't be involved. Music sound VFX everything.  
Il Make it through somehow . Just need to feel it all.

**June 5, 2024:** Baldoni's editors inform Baldoni that they had heard from a "secret source" that Lively was incorporating "a bunch of [Baldoni's] version back into the Film" ahead of the second official audience test screening of Lively's cut on June 6, 2024.



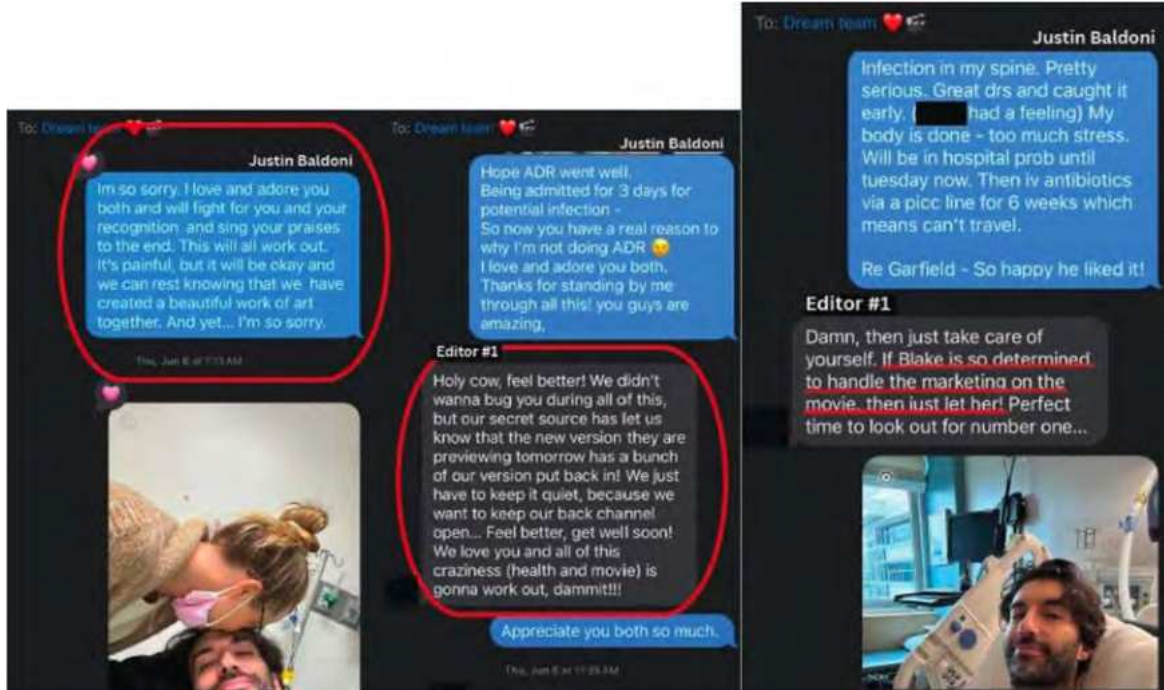
**June 6, 2024:** Wayfarer and Sony pay for a second official audience test screening of Lively's latest cut. Scores marginally increased across the board, scoring 83% with females under 35 (still 11 points short of Baldoni's cut).

<div></div> screen engine/asi COMPARISON SHEET			MOVIE PREVIEW				
			TOTALS	MALES	FEMALES		THEATRICAL TARGETS
					Under 35	35 & Over	
RATINGS							
EXCELLENT							
6.6.24	Movie Preview	Torrance, CA	52%	46%	54%	58%	66%
5.30.24	It Ends With Us	Aliso Viejo, CA	48%	42%	41%	63%	66%
5.13.24	It Ends With Us	Aliso Viejo, CA	56%	39%	62%	63%	66%
VERY GOOD							
6.6.24	Movie Preview	Torrance, CA	29%	32%	29%	27%	27%
5.30.24	It Ends With Us	Aliso Viejo, CA	35%	32%	41%	29%	27%
5.13.24	It Ends With Us	Aliso Viejo, CA	29%	34%	32%	21%	27%
TOTAL POSITIVE							
BL Cut #2 → 6.6.24	Movie Preview	Torrance, CA	81%	77%	83%	84%	93%
BL Cut #1 → 5.30.24	It Ends With Us	Aliso Viejo, CA	83%	74%	82%	92%	93%
JB Cut #1 → 5.13.24	It Ends With Us	Aliso Viejo, CA	85%	73%	94%	84%	93%
RECOMMENDATIONS							
YES, DEFINITELY							
6.6.24	Movie Preview	Torrance, CA	63%	61%	59%	73%	83%
5.30.24	It Ends With Us	Aliso Viejo, CA	62%	51%	59%	78%	83%
5.13.24	It Ends With Us	Aliso Viejo, CA	66%	48%	74%	74%	83%

\*Target demo\*



**June 6, 2024:** Baldoni is hospitalized for 3 days due to a spine infection.



**June 12, 2024:** Wayfarer is informed that Blake Lively told Sony that she will showing audiences at Book Bonanza *her* cut of the Film, regardless of Sony or Wayfarer's approval. She later admitted on her panel at the event that the "studio begged her not to show the Film" but ultimately, they "didn't have the option [to say no], as [she] brought the movie with her on the airplane." A video of this comment is available at the 48:32 mark at: <https://youtu.be/8P5POKBU7Ys>.

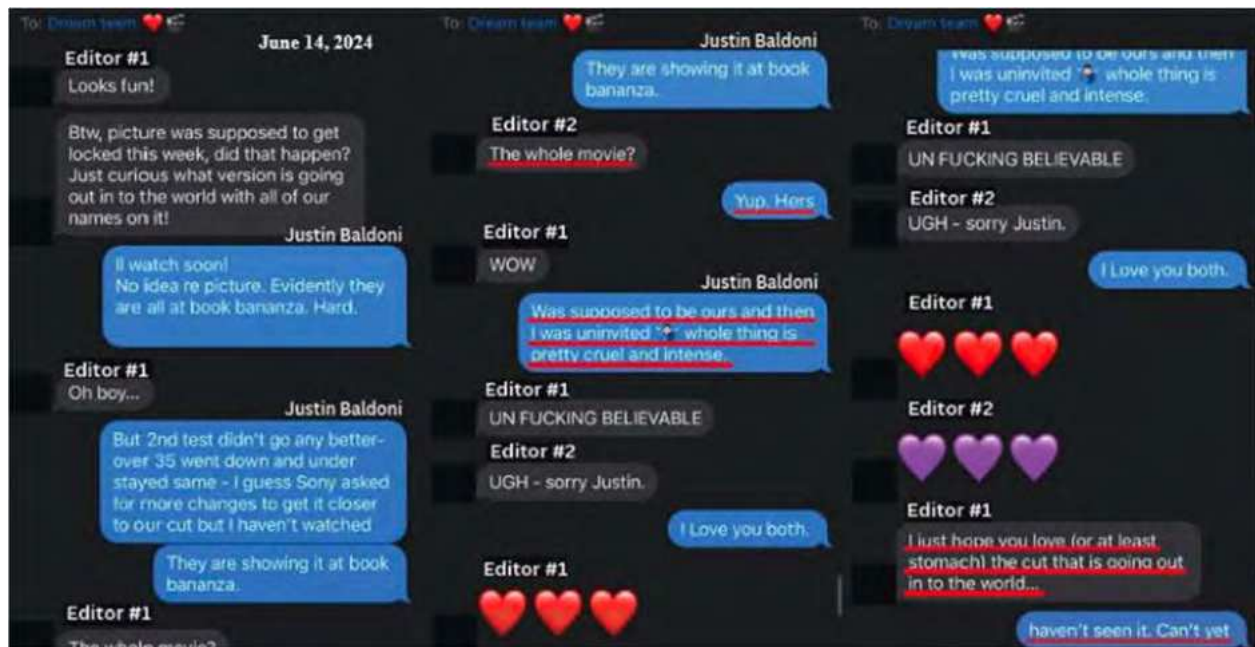
**June 14, 2024:** Lively, Colleen Hoover, Brandon Sklenar and Isabela Ferrer attend Book Bonanza to promote the Film's release. Wayfarer was only made aware that Brandon and Isabela would be in attendance the day of event. Sony later notified Wayfarer that it was Lively who reached out to Brandon and Isabela and paid for their travel and lodging.







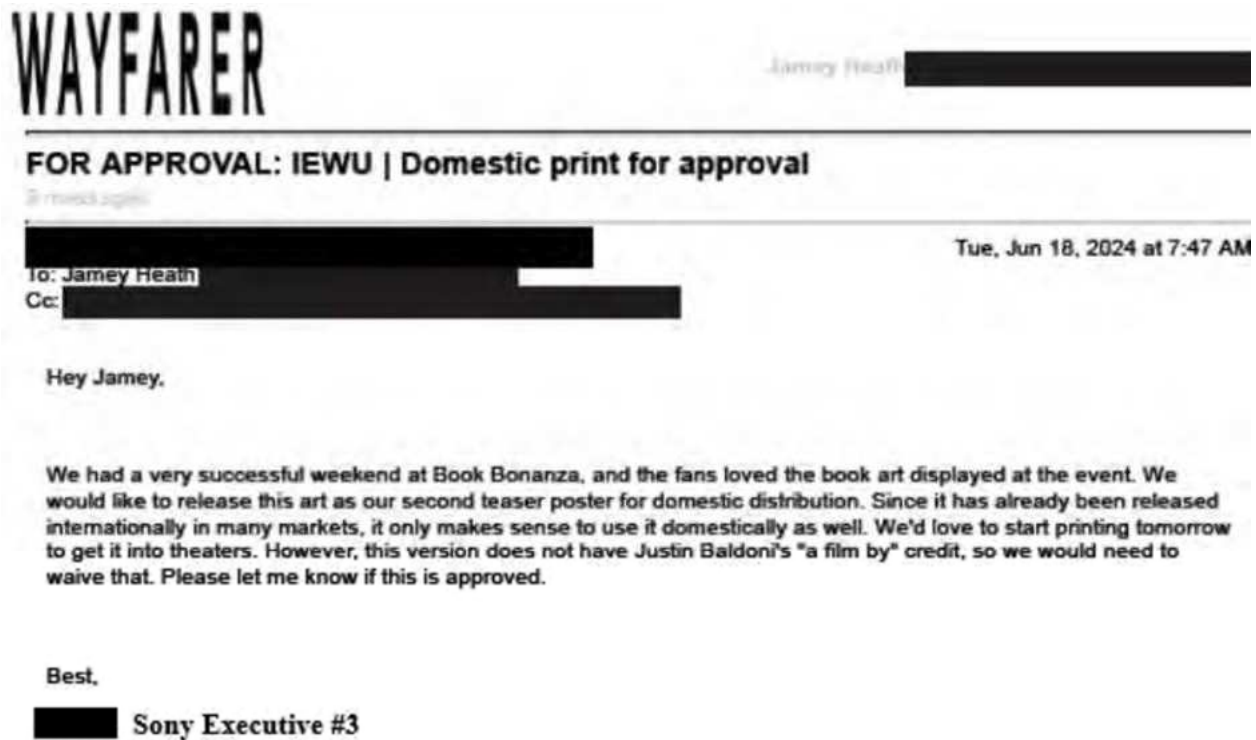
**June 14, 2024:** Baldoni shares with his editors that Lively's cut of the Film would be shown on the second day of Book Bonanza.



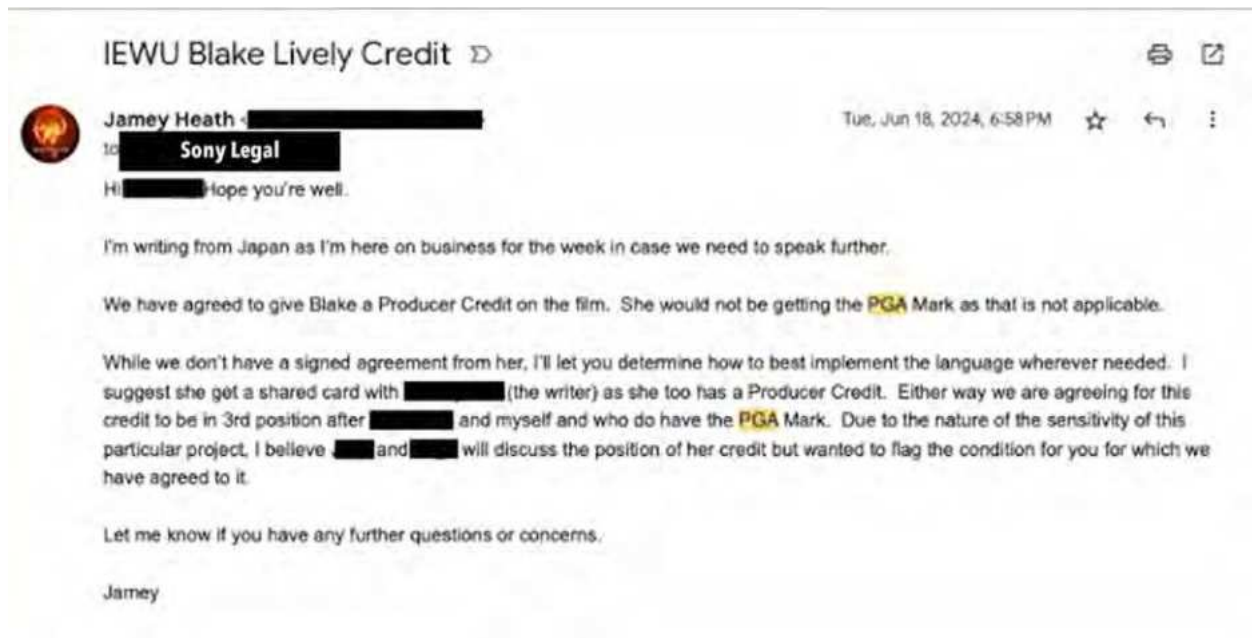
**June 17, 2024:** Lively makes the unilateral decision to bring on a new composer for the Film. As a result, the original award-winning composer was let go despite having already completed the score - which included costly orchestral arrangements. Even though Lively had absolutely no right to do this, neither Wayfarer nor Sony were able to challenge Lively's decision, despite the significant financial implications—paying out the original composer in full and shouldering the steep costs of hiring a new composer so late in the process.

**June 18, 2024:** Sony marketing requests that Baldoni waive his "Film By" credit on the secondary poster so that only Lively's name would appear above the title. Further, despite having already approved a poster for the Film it was understood by Wayfarer that Lively would not

approve this new version in which Baldoni's name appeared next to hers, thus requesting that Baldoni's name be removed. Sony obliged and made the ask to Baldoni. Given this is a contractual right that Baldoni negotiated, Sony needed Baldoni to put in writing that he was waiving his right to "a film by" credit. For clarity there would be no reason for Baldoni to waive this right without Lively requiring him to do so, ultimately he acquiesced.



**June 18, 2024:** On the same day that Baldoni waives his "Film by" credit, Wayfarer also reluctantly agrees to give Lively a producer credit on the Film. This was an ask that she took to Sony, despite it being a decision properly made by Wayfarer. She was originally credited only as an executive producer, but both Wayfarer and Sony no longer had the leverage to oppose her demands or the will to deal with the fallout if they were to deny the credit at that point. Wayfarer conceded and informed Sony, while also remarking that "they would not be advocating for her getting the PGA Mark as that is not applicable." Given Lively's contributions to the Film, it was collectively agreed among the producers that she had not earned the distinction of the PGA mark.



**June 20, 2024:** Shortly after granting Lively the producer credit, Heath was informed that Lively had reached out to Sony yet again, this time to ask that Baldoni and Heath write a letter on her behalf so that she may be considered to receive the PGA mark. Both Baldoni and Heath did not feel that her work warranted the PGA mark - a distinction highly valued and taken seriously within the industry. As Heath had already noted in his email on June 18, they didn't feel it right to misrepresent her contributions in order for her to get a PGA mark. Heath had learned from Sony that Lively was extremely displeased with this response and told Sony that as a result of the men not submitting the letter, "any goodwill left was now gone".

**June 20-24, 2024:** Abel (Baldoni's Publicist) emails Sony's marketing team to inquire about a content shoot that Lively seemingly coordinated with Maximum Effort, Ryan Reynolds' production company. Sony at the time of the initial outreach by Abel was not aware of the plans for the shoot (which were planned for June 27-28). Later Sony attested to the fact that that Lively and Maximum Effort were "running the show." Abel was understandably concerned at the optics of the entire cast doing a content shoot without the director and co-lead being present. This would later be something that the public would take notice of as well and heightened the rumors and negative press that Lively would take issue with.

**From:** Jennifer Abel <[REDACTED]@jonesworks.com>  
**Sent:** Friday, June 21, 2024 9:29 AM  
**To:** [REDACTED]@spe.sony.com>; [REDACTED]@spe.sony.com>  
**Cc:** [REDACTED]@jonesworks.com>  
**Subject:** Re: Quick question

#3

Me again! Just checking in to see if you've heard anything else about this? Is it happening on Monday, or when? Just want to make sure that we stay on top of this and can put together some content ideas for JB to also be included, so it's less apparent that he's not physically there with the cast...

Keep me posted pls, really appreciate it!

**From:** Jennifer Abel <[REDACTED]@jonesworks.com>  
**Date:** Thursday, June 20, 2024 at 11:58 AM  
**To:** [REDACTED]in@spe.sony.com>; [REDACTED]spe.sony.com>  
**Cc:** [REDACTED]@jonesworks.com>  
**Subject:** Re: Quick question

#2

Ok... if it's something that's going to be used in an official way on socials etc for the film then we need to find a way to include Justin. We can't have fans guessing as to why he isn't in this kind of stuff! Thank you!

**From:** [REDACTED]@spe.sony.com>  
**Sent:** Thursday, June 20, 2024 11:50:46 AM  
**To:** Jennifer Abel <[REDACTED]@jonesworks.com>; [REDACTED]@spe.sony.com>  
**Cc:** [REDACTED]@jonesworks.com>  
**Subject:** RE: Quick question

Hi! We just heard that about that too. She wants to do tape more content with some of the actors.

We can keep you posted when we know more!

**From:** Jennifer Abel <[REDACTED]@jonesworks.com>  
**Sent:** Thursday, June 20, 2024 9:22 AM  
**To:** [REDACTED]@spe.sony.com>; [REDACTED]@spe.sony.com>  
**Cc:** [REDACTED]@jonesworks.com>  
**Subject:** Quick question

#1

Morning! Quick question for you both.... I'm hearing through the grapevine that Blake is having her agent (and other producers, ie. [REDACTED]) reach out to the reps of the other cast members for an IEWU event she is putting together next week...

Just want to get ahead of this—is this something official for the film that is being organized, or something more private that Blake is hosting? Do you guys know about this at all?

I don't want to make a stir about it or let people know that we/JB team knows about it so just wanted to keep it between us.

Let me know when you can—thanks!

-Jennifer



From: [REDACTED]@jonesworks.com>  
Sent: Monday, June 24, 2024 3:30 PM  
To: Jennifer Abel <[REDACTED]@jonesworks.com>; [REDACTED]@spe.sony.com>  
Subject: Re: Quick question

#6

Hey [REDACTED]

Great to see you on the call. Didn't want to ask about this with the big group, but do you have any more intel here about the event Blake is putting together to capture more content?

We just want to be armed with the details ahead of time so there aren't surprises and so we can plan accordingly to have Justin included in content as well.

Thank you!

www.jonesworks.com

JONESWORKS observes "Summer Fridays" from Memorial Day to Labor Day. While our offices will be closing at 1pm PT/ET, we will still be checking email periodically and are reachable via phone for any timely matters.

From: Jennifer Abel <[REDACTED]@jonesworks.com>  
Date: Friday, June 21, 2024 at 10:45AM  
To: [REDACTED]@spe.sony.com>, [REDACTED]  
<[REDACTED]@spe.sony.com>  
Cc: [REDACTED]@jonesworks.com>  
Subject: Re: Quick question

#5

Ok thanks so much!!

From: [REDACTED]@spe.sony.com>  
Date: Friday, June 21, 2024 at 9:39 AM  
To: Jennifer Abel <[REDACTED]@jonesworks.com> [REDACTED] <[REDACTED]@spe.sony.com>  
Cc: [REDACTED]@jonesworks.com>  
Subject: RE: Quick question

#4

Hi!

No, we haven't heard anything on our side yet. Will keep you posted!

From: Jennifer Abel <[REDACTED]@jonesworks.com>  
Sent: Friday, June 21, 2024 9:39 AM

#3

**From:** Jennifer Abel <[REDACTED]@spe.sony.com>  
**Date:** Monday, June 24, 2024 at 4:09 PM  
**To:** [REDACTED]@jonesworks.com> [REDACTED]@spe.sony.com>, [REDACTED]  
**Subject:** Re: Quick question

#9

Can we be connected to maximum effort? Who are they exactly? We cannot have some cast doing content and the rest not being included, we will need to find another way for JB to participate in this and we need Sony support here.

**From:** [REDACTED]@jonesworks.com>  
**Sent:** Monday, June 24, 2024 3:42:03 PM  
**To:** [REDACTED]@spe.sony.com>; Jennifer Abel <[REDACTED]@jonesworks.com> [REDACTED]  
**Subject:** Re: Quick question

#8

Yes for screenings. We're working on the latest dates and will share over to you, thanks for working with us on that.

With the content, is Sony supporting these efforts and will you use materials from the events? Are they running any of the ideas by the Sony teams or is Maximum Effort totally off on their own island with this? Again, we just really want to ensure Justin is being included where possible supporting the film.

Thanks [REDACTED]

[REDACTED] JONESWORKS

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

JONESWORKS observes "Summer Fridays" from Memorial Day to Labor Day. While our offices will be closing at 1pm PT/ET, we will still be checking email periodically and are reachable via phone for any timely matters.

**From:** [REDACTED]@spe.sony.com>  
**Date:** Monday, June 24, 2024 at 3:36 PM  
**To:** [REDACTED]@jonesworks.com>, Jennifer Abel <[REDACTED]@jonesworks.com>, [REDACTED]@spe.sony.com>  
**Subject:** RE: Quick question

#7

Hi! Nice to see you too!

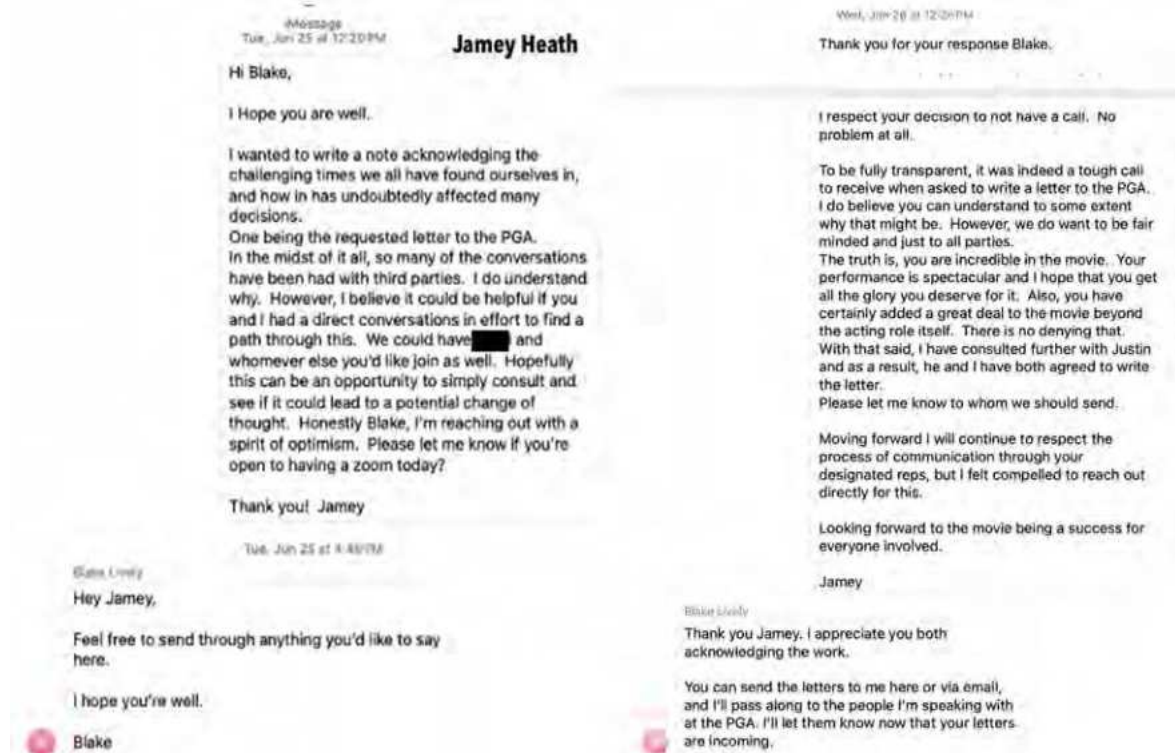
For the screenings – will you just let us know when you have each journo's avails for the latest they could see it? And then we can try to get other folks into that screening as well.

For the Content, Blake and Maximum Effort are really running the show. We know it's Thursday and Friday, but Blake has been talking to talent and Maximum Effort is leading the planning. I'm not flying out for it either!

**From:** [REDACTED]@jonesworks.com>  
**Sent:** Monday, June 24, 2024 3:30 PM  
**To:** Jennifer Abel <[REDACTED]@jonesworks.com>; [REDACTED]@spe.sony.com> [REDACTED]

#6

**June 25, 2024:** While contemplating the PGA letter and fearing what Lively was capable of, Heath reached out to Lively via text in order to humanize the situation. It had been months since Lively had spoken to Baldoni or Heath directly, as she insisted at each turn that she needed an intermediary. This time was no different as she refused to get on a call. Heath, feeling that she was unwilling to even hear them out, again conceded and agreed to write the letter recommending Lively for a PGA mark.



**June 26, 2024:** After many conversations and once again feeling trapped, Baldoni and Heath write a letter of recommendation to the PGA on behalf of Lively and send a copy to Lively to submit to the PGA. Heath simultaneously wrote a letter to his attorneys deriding the extortion by Lively.



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,

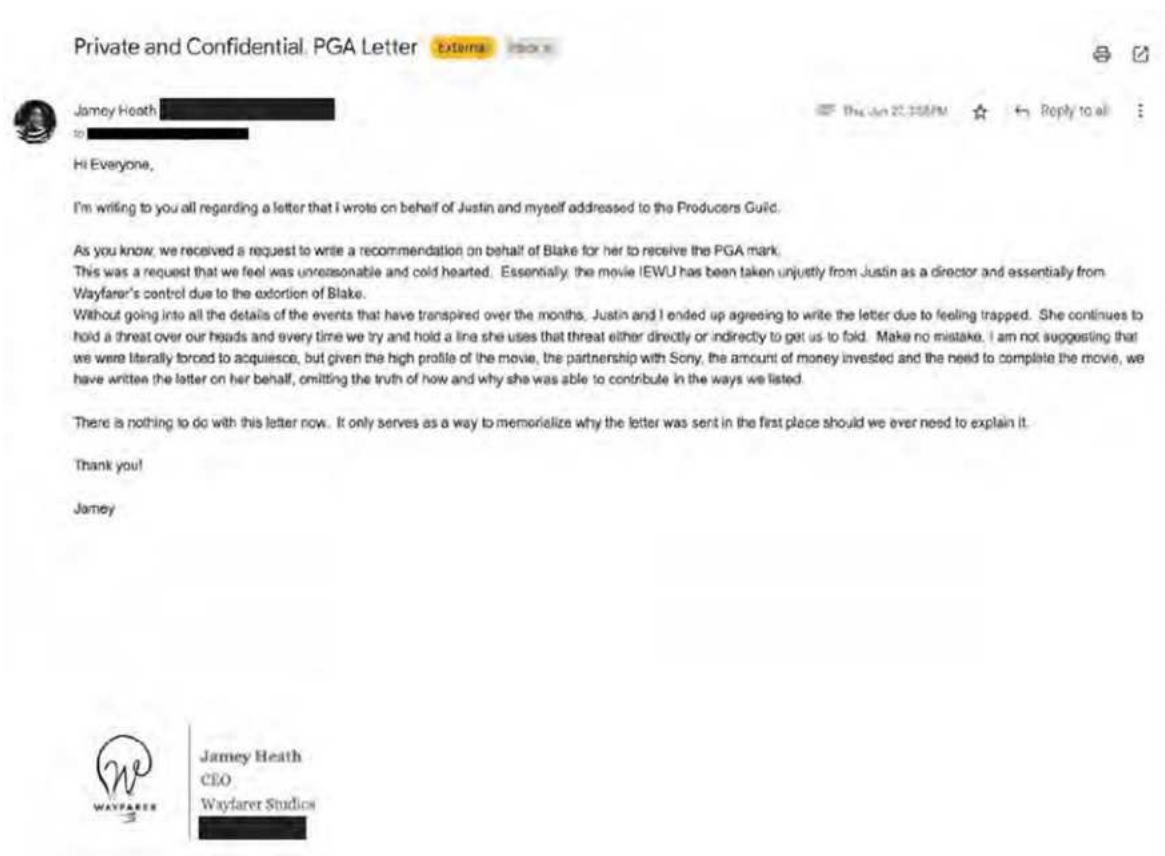
Justin Baldoni -  
Director *IT ENDS WITH US*

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

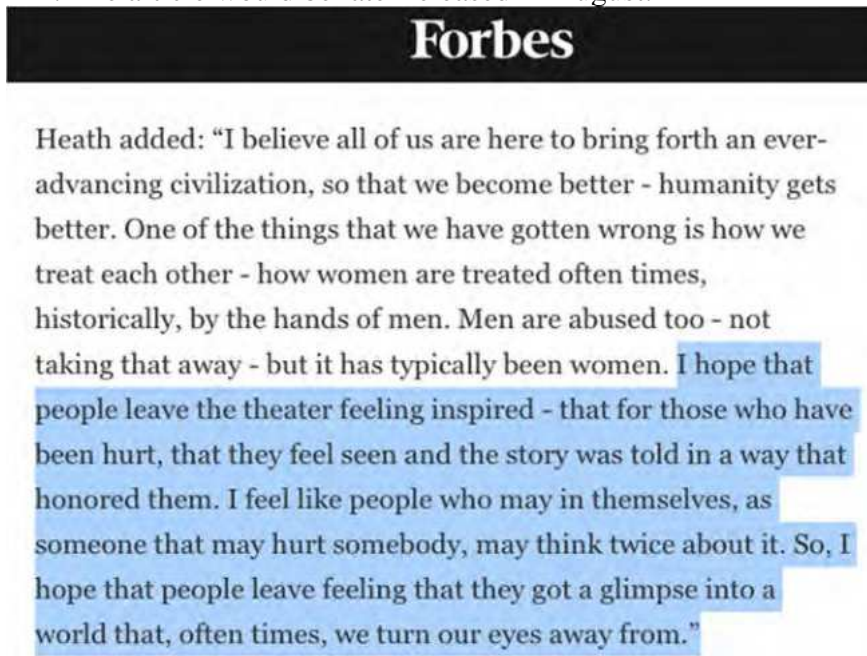


  
**Jamey Heath**  
CEO  
Wayfarer Studios  






**June 28, 2024:** Heath, the CEO of Wayfarer, expressed to Forbes on June 28, 2024 his high hopes for the Film. The article would be later released in August.



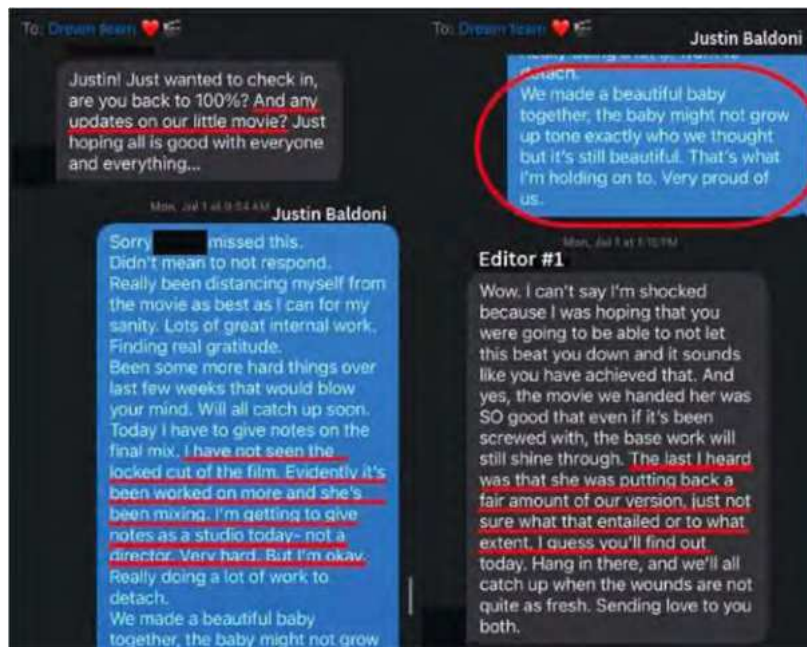
**June 28, 2024:** Lively and Reynolds' company Maximum Effort organized a content shoot for the Film's promotional campaign with the entire cast and author of the book (minus Baldoni of course). The content shoot included the cast making flower arrangements, baking cookies, playing Pictionary, collage making and other concepts developed by the Maximum Effort team in support of the Film's promotion. They later posed for seemingly staged paparazzi photos before having dinner together.





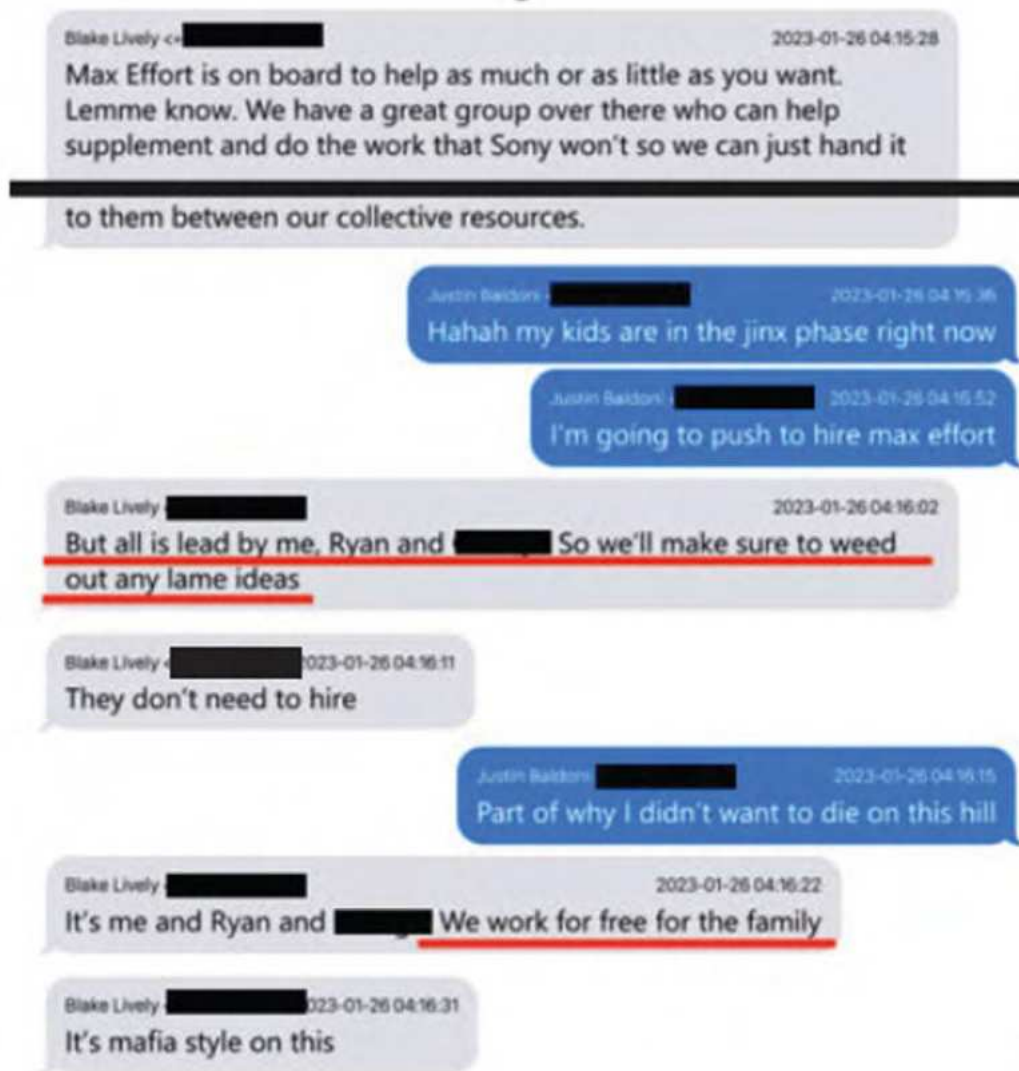


**July 1, 2024:** By July 2024, Baldoni was completely locked out of the Film's final cut. By virtue of his role at Wayfarer, he was permitted to "give notes as a studio." Despite his personal feelings, he redirected his thoughts to focus on the one positive: The Film, years in the making, was very close to being seen by the world, even if it was no longer his Film. The Film's original editors inform Baldoni that the last they heard "she was putting back a fair amount of [Baldoni's] version" into the final cut.

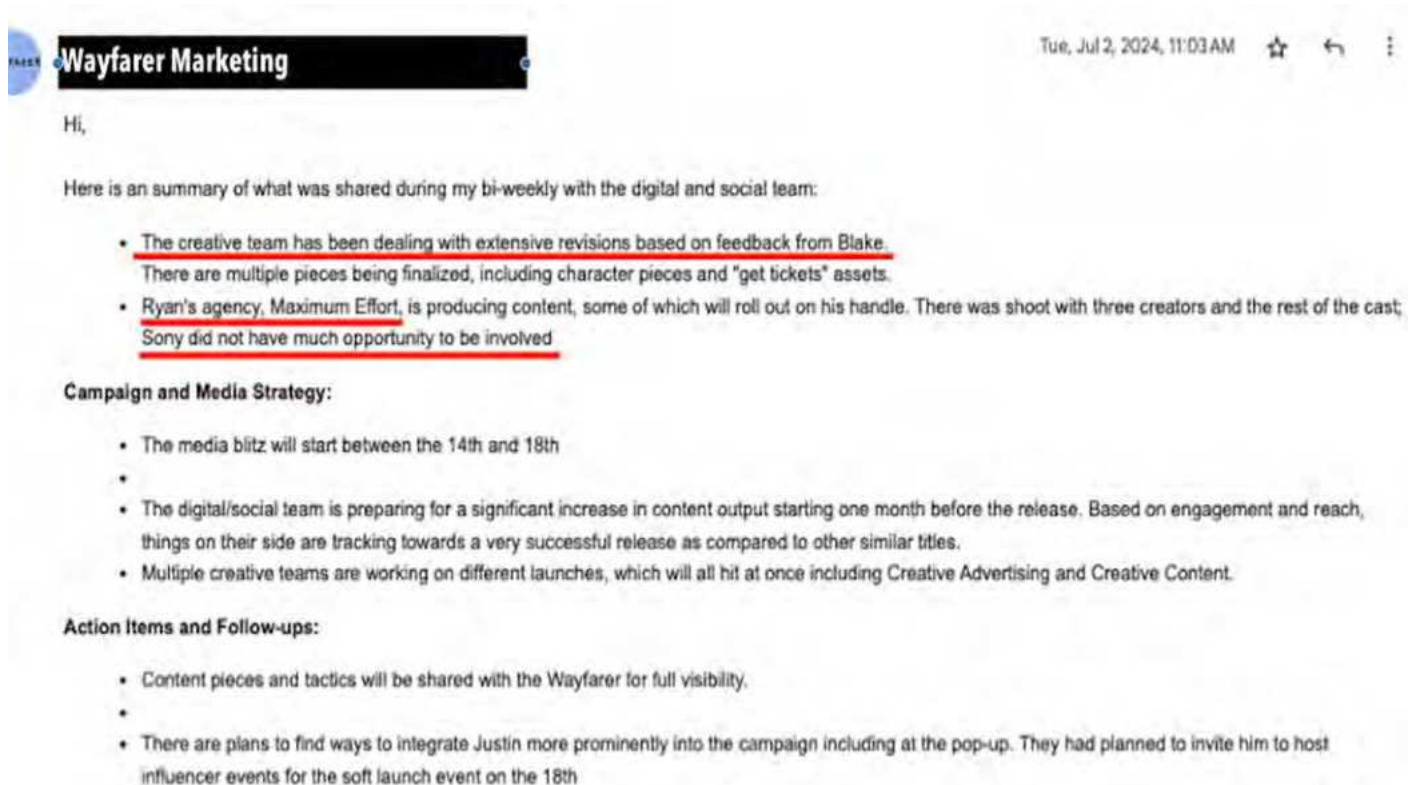


**July 2, 2024:** On a Zoom videoconference between Wayfarer and Sony Marketing, Wayfarer learned that Sony had been dealing with extensive notes and revisions to the marketing plan as a result of the content shoot. Because Sony ended up hiring Reynolds' company, Maximum Effort, to produce the promotional content for the Film, the cost for the shoot significantly increased due to their fee being higher than what Sony had originally budgeted. (Notably, this charge was

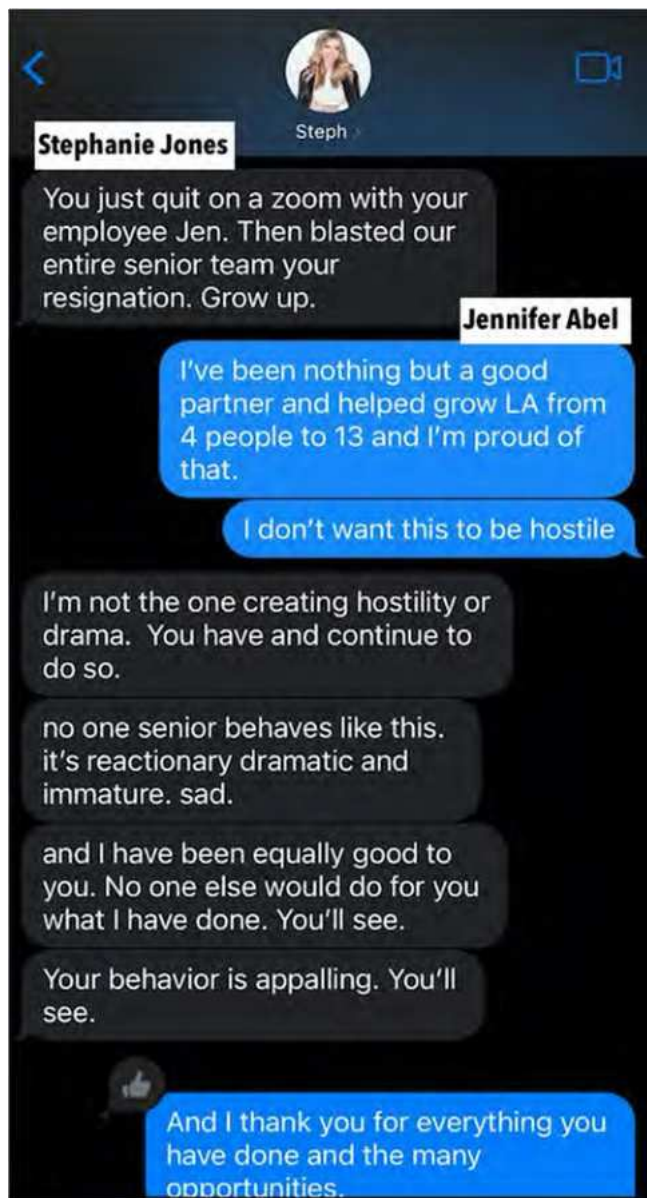
despite Lively's claim in a January 2023 text to Baldoni that Maximum Effort would "work free for the family, as shown below.) Despite ultimately approving this, Wayfarer was told that Sony was not allowed direct access to the footage (which they had paid for). This shoot included the cast baking cookies, floral arrangements, ironing patches on jeans, and other quirky ideas that completely missed the point of the movie, skirting the issue of domestic violence entirely to the detriment of all those involved. As noted in the email, "Sony did not have much opportunity to be involved" in the shoot.







**July 10, 2024:** Whilst dealing with the Baldoni's mounting PR headaches, Baldoni's Publicist Jennifer Abel was also dealing with a difficult working relationship with her employer, Stephanie Jones (Founder of Jonesworks PR). The tension between Jones and Abel reached a tipping point when Jones, whose behavior had become increasingly erratic and hostile, demanded Abel 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." As a result on July 10, 2024, Abel notified Jones of her decision to depart from Jonesworks and intention to start her own business. Abel offered a six-week transition period, with an end date of August 23, 2024, and notified her colleagues.



From: Jennifer Abel <[REDACTED]@jonesworks.com>  
Date: Wednesday, July 10, 2024 at 5:20 PM  
To: Stephanie Jones <[REDACTED]@jonesworks.com>, [REDACTED]  
[REDACTED]  
[REDACTED]

Subject: My resignation

Per my call right now with Stephanie, I want to thank everyone for the incredible support and opportunities over the past few years at JW but I have made the unfortunate decision to resign.

I will stay as long as needed for the transition and to ensure teams and clients are supported. I will not discuss with clients or with teams until you give me the greenlight.

Thank you,

-Jennifer

**July 11, 2024:** In anticipation of an in-person interview with a national publication that requested to follow him for a “Day in the Life” piece, Baldoni reaches out to the post-production house working on *It Ends With Us* to find a time for him to come in for a few minutes and do a mock coloring session. At the time, the coloring was nearly complete. This was all done in an effort to promote the Film and, of course, highlight Baldoni as its director. However, when Lively was informed of this “fake coloring session,” she was incensed and demanded that Sony intervene and stop the interview from happening Sony obliged which left Baldoni and team disturbed by Lively’s insertion into Baldoni’s own marketing and promotional efforts for the Film.

**July 15, 2024:** Wayfarer is informed that Reynolds contacted Baldoni’s personal agent at WME. During the call, Reynolds escalates his attack on Baldoni’s character, calling him a “deranged predator.” Baldoni’s agent relays to Wayfarer that he did his best to reason with Reynolds and challenge the absurd claims, but Reynolds was unwilling to consider any counter-narrative. Reynolds reiterated that Baldoni should not attend the premiere on August 6th, stating, “no one wants him there.” When Baldoni’s agent shares this conversation with Baldoni and Heath, both are disturbed by Reynolds’ continued efforts to damage Baldoni’s reputation within the agency.

**July 17, 2024:** Baldoni attends Lily Bloom’s Pop-up Shop at Westfield Century City to promote the Film. Following the Pop-up, Jones contacts Abel to check in. Abel shares that Baldoni is struggling and under immense pressure. Moreover, Baldoni is dealing with Ryan Reynolds “calling [Baldoni’s] agent and saying what a horrible person Justin is.”



**July 22, 2024:** Lively, Reynolds and other members of the Film’s cast attend the premiere for *Deadpool & Wolverine*. At the afterparty, Wayfarer was informed that Reynolds approached a senior executive at WME and expressed his deep disdain for Baldoni, going as far as to suggest that the agency is working with a “sexual predator.”

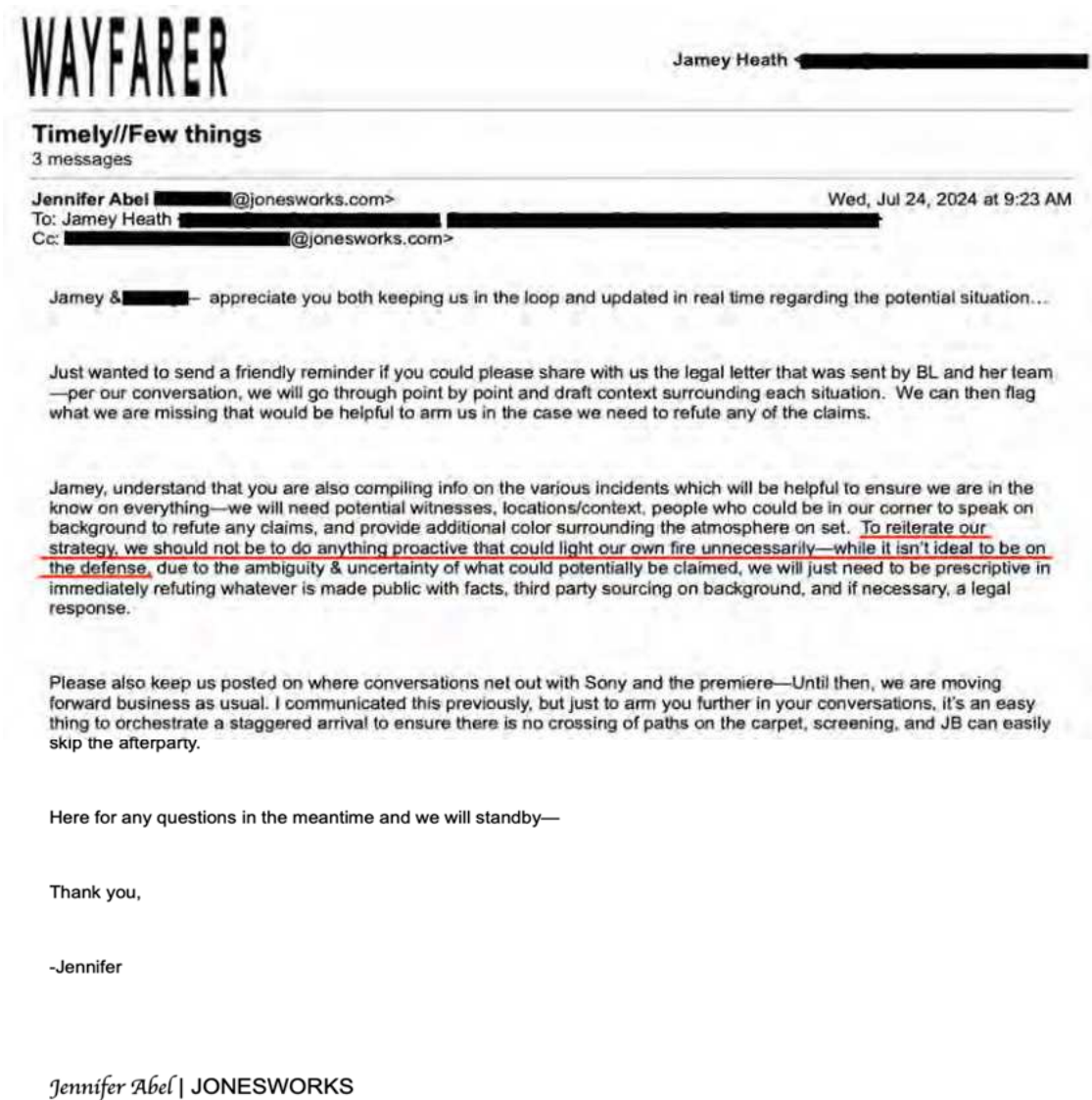


**July 23, 2024:** Sony informs Wayfarer—the studio financing the premiere and most of the Film—that Lively had demanded that Baldoni, Heath, and Wayfarer refrain from attending the New York premiere and threatens a cast-wide boycott if they do.

**July 24, 2024:** Mindful of the potential premiere boycott, and not knowing what Lively and Reynolds were planning to do if Baldoni and team attended, Abel emails the Wayfarer team requesting Lively’s November legal letter correctly assuming that Lively would try to use the



letter against Wayfarer. With the letter in hand Abel intends to draft context for each issue to ensure the team can factually refute any press leaks. Abel emphasizes a reactive strategy, acknowledging its drawbacks, and advises promptly countering any public claims with facts, third-party sources, and, if necessary, legal action: “We will just need to be prescriptive in immediately refuting whatever is made public with facts, third-party sourcing on background, and if necessary, a legal response.” Upon receiving Lively’s 17-item list, Abel clarifies that they are “demands, not grievances.”



Jennifer Abel [REDACTED]@jonesworks.com> Wed, Jul 24, 2024 at 12:24 PM  
 To: [REDACTED]@wmeagency.com>  
 Cc: Jamey Heath [REDACTED]  
 [REDACTED]

Great thanks. A quick follow here, we received the letter via the Wayfarer team so we are going through it. It's a list of her demands, not grievances, but still helpful for us to have. I'm also looping in [REDACTED] let's keep her copied on these comms. Thanks again.

[Quoted text hidden]

**July 24, 2024:** Later that morning, at Wayfarer's request, Abel contacts Jones for crisis PR firm recommendations to represent Baldoni.

Wed, Jul 24 at 11:02 AM

[REDACTED]

[REDACTED]

Jennifer Abel

Also— I just got off the phone with Wayfarer and she was asking for our Recs for a potential crisis comms team if they wanted to bring someone in to work hand in hand with us if needed. She mentioned [REDACTED] which she said you guys all worked together for [REDACTED] but I said I would connect with you for best recos.

Stephanie Jones

def not [REDACTED] he's not strong. who do you rec? i think [REDACTED] could be amazing or [REDACTED] team.

I've only ever worked with [REDACTED] or [REDACTED] Not familiar with [REDACTED] but I trust your recs here!!

**July 25, 2024:** Wayfarer receives several crisis PR recommendations, including Melissa Nathan ("Nathan"), a veteran in the field. Abel, having previously worked with Nathan, endorses her based on their strong professional relationship.

**July 25, 2024:** Wayfarer meets with Nathan and her firm, The Agency Group PR LLC ("TAG"). After the introductory call, TAG provided a document detailing their proposed scope of work.

Melissa N <[REDACTED]>

Thu, Jul 25, 2024 at 9:42 PM

To: [REDACTED]

Cc: [REDACTED] Jamey Heath <[REDACTED]>

Thank you so much for taking the time to speak with us.

Jen and our team will connect tomorrow and go through everything.

I know time is definitely of the essence here - we will aim to have a plan to you by the end of tomorrow.

Have a lovely evening

Melissa

Sent from my iPhone

On 25 Jul 2024, at 18:30, [REDACTED] wrote:

We would love to jump on a zoom now if possible.

[Quoted text hidden]

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To: Melissa N <[REDACTED]>

Fri, Jul 26, 2024 at 11:02 AM

Cc: [REDACTED] Jamey Heath <[REDACTED]>

Hi all,

Thank you so much again for the time last evening and for the incredible context provided to us.


As promised, please find our attached scope of work, which details our overall approach, opportunities to prevent and mitigate crisis, aid the larger team in branding and messaging, and finally, our cost of services.

We look forward to your thoughts and feedback on this – and of course, please do let us know of any questions you might have.

Thank you,

[REDACTED]  
[Quoted text hidden]

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 Wayfarer Studios - TAG PR Scope of Work 7.26.24.pdf  
101K

## THE AGENCY GROUP PR

To: Jamey Heath,  
From: The Agency Group (TAG) PR  
Subject: Scope of Work  
Date: 7/26/24

### OVERVIEW

TAG PR will work closely with Jonesworks, Justin Baldoni, Wayfarer Studios, and its applicable executives to design and implement a crisis communications strategy to protect and enhance the reputations of Justin Baldoni, Wayfarer Studios, and their executives while navigating through anticipated and unforeseen challenges leading up to the "It Ends With Us" premiere and its aftermath.

As part of our efforts to protect the company's position, TAG PR will provide ongoing strategic counsel and rapid interference to mitigate references of controversy, correct inaccurate narratives, and push out factual, positive messaging to create a level of control and balance in coverage surrounding the premiere and, in the months afterwards.

Our plan will be tailored to reach key audiences including selected media, industry decision makers, partners, investors, and other creatives to ensure the longevity and prosperity of Justin Baldoni, Wayfarer Studios, its applicable executives, and future projects.

Our approach will include the following elements:

### CRISIS PREVENTION & MITIGATION

- Support Justin Baldoni, Wayfarer Studios and its applicable executives with independent strategic counsel and perspective.
- Curate statements, background information, and talking points for press reflecting the company's core values, key messaging and the integral role they played to bring this film to life.
- Develop a comprehensive scenario planning document outlining a series of potential outcomes with a suggested course of action for each variable.
- Catalog third party validators from the crew, previous projects, and other industry peers to establish credibility around the narrative and help shape perception in the press.
- Provide input on specific inquiries and liaise with reporters to mitigate negative stories/correct inaccuracies.
- Monitor coverage and social conversations, correcting and updating stories & headlines in real time.





#### **BRANDING & MESSAGING**

As needed, our team can be helpful in identifying and supporting future proactive opportunities to further assuage any potential negativity. These efforts will include:

- Align with Jonesworks and team on the timeline for the coming months to establish key moments and determine accessible opportunities.
- Support Jonesworks in media management as appropriate, to ensure Justin, the company, and its team are positioned in a positive light.
- Define target audiences and identify areas of focus and sensitivity.
- Review, refine, and help to create all existing communications materials and incorporate consistent, unified messaging, including but not limited to, boilerplates, talking points, press releases, statements, event and appearance materials, promotional language, and more.
- Curate statements, background information, and responses for press.
- Provide input on press inquiries as appropriate and liaise with reporters through this time of crisis to filter through opportunities and determine which are valuable to Justin, Wayfarer Studios, and executives' overall profiles and reputations.
- Manage and oversee any potentially negative stories and correct inaccuracies, as necessary.
- Work with Jonesworks and team to monitor relevant coverage and social conversations while flagging, correcting, and updating as needed, adding statements, and background items, and more in real time.
- Perform media training and prep sessions by drafting and reviewing talking points and facilitating a mock interview experience, as necessary.

#### **FEES & EXPENSES**

Term: 3 months | Agency Fee: \$15,000/month | Expenses: As Incurred

**July 26, 2024:** Upon learning that Wayfarer was considering working with Melissa Nathan, Stephanie Jones, seeing her as competition began pressuring Abel to intervene and tell Wayfarer that she was “shady”. Abel refused to do so which only made Jones more irritated.



**July 26, 2024:** After extensive consultation and frustration over Reynolds' and Lively's ongoing threats, Baldoni and Heath inform Sony that Wayfarer will attend its own premiere. Given Lively's heavy promotion of the Film, the likelihood of her boycotting seemed low, and her leverage appeared to be weakening as the event neared (or so they thought). However, Baldoni remained deeply anxious, fearing potential retaliation from Lively and Reynolds simply for attending his own premiere.

That same day, an article surfaced about another director facing allegations of inappropriate on-set behavior. Baldoni forwarded the link to Abel, adding his own remarks: "This is the shit I'm sure they want to do—unnamed sources, etc."

**Jennifer Abel**

JA

Ok sounds good will connect all of us at 4pm

Fri, Jul 26 at 1:37 PM

**Justin Baldoni**

Video of Francis Ford Coppola Kissing 'Megalopolis' Extras  
Surfaces as Crew Members Detail Unprofessional Behavior  
on Set (EXCLUSIVE)

Variety  
News

This is the shit that I'm sure they want to do - unnamed  
sources etc  
Just sharing - I know I know -

**July 26, 2024:** Amid the turmoil surrounding Baldoni, and over two weeks after submitting her resignation, Abel emailed Jones to express gratitude and assure her of no "ill will." However, she remained resolute in her decision to leave Jonesworks.

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

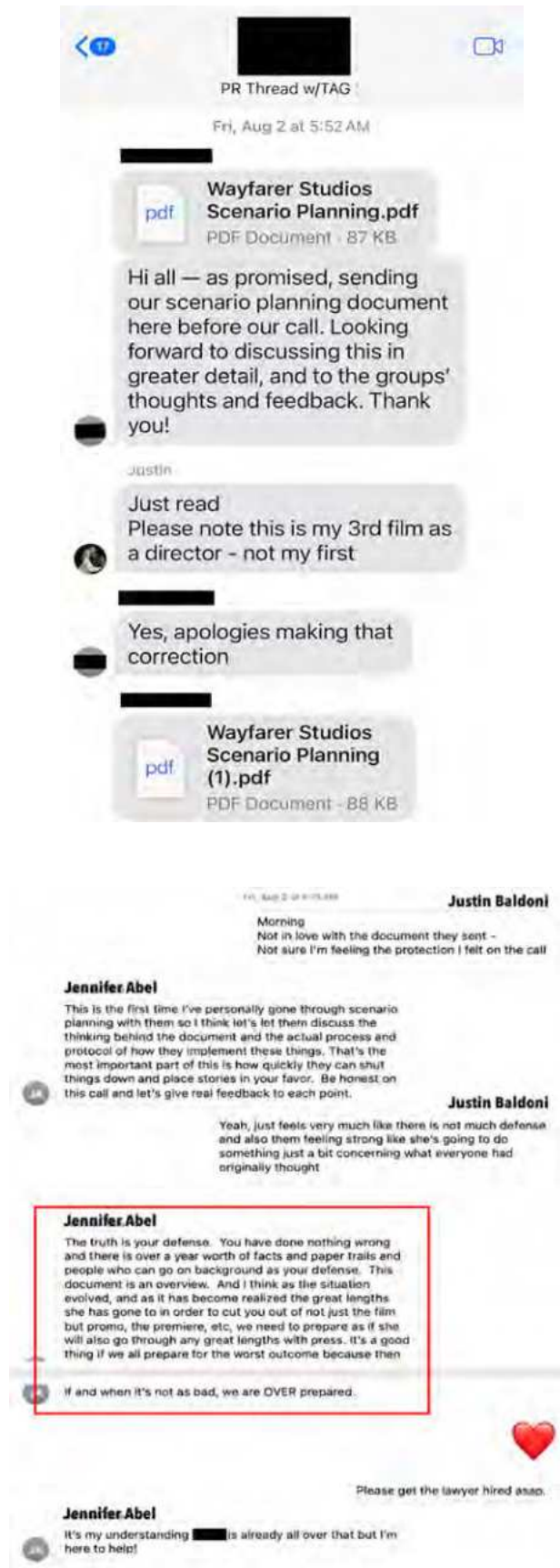
**July 30, 2024:** Sony and senior marketing executives inform Heath and Abel that Lively has demanded Baldoni conduct his junket interviews on a different day than hers, further ostracizing Baldoni. Abel pushes back, arguing that this would signal to the press that something was wrong. Ultimately, Abel is able to find a compromise and they agree Baldoni would conduct his interviews separately from the rest of the cast at a different hotel but on the same day.

**July 31, 2024:** Social media "detectives" begin to notice Baldoni's absence from the promotional content being posted online.



**August 2, 2024:** Recognizing the extreme measures Lively and Reynolds were taking to undermine Baldoni—excluding him from the premiere and press tour, spreading negative rumors within his agency, isolating him from cast events and promotions, and engaging in strongarm tactics to take control of the Film—Baldoni and Heath decide to retain Nathan and TAG. Baldoni and Heath did so after Abel learned from Nathan that a negative story was being circulated among media contacts, labeling Baldoni's religion as a "cult" and accusing him of "fat-shaming" Lively. In response, TAG prepared a 'scenario planning document' with rapid response strategies, key messaging, and other, standard crisis PR deliverables. Feeling uneasy, Baldoni texts Abel for reassurance. She responds, in part: "TRUTH is your defense."



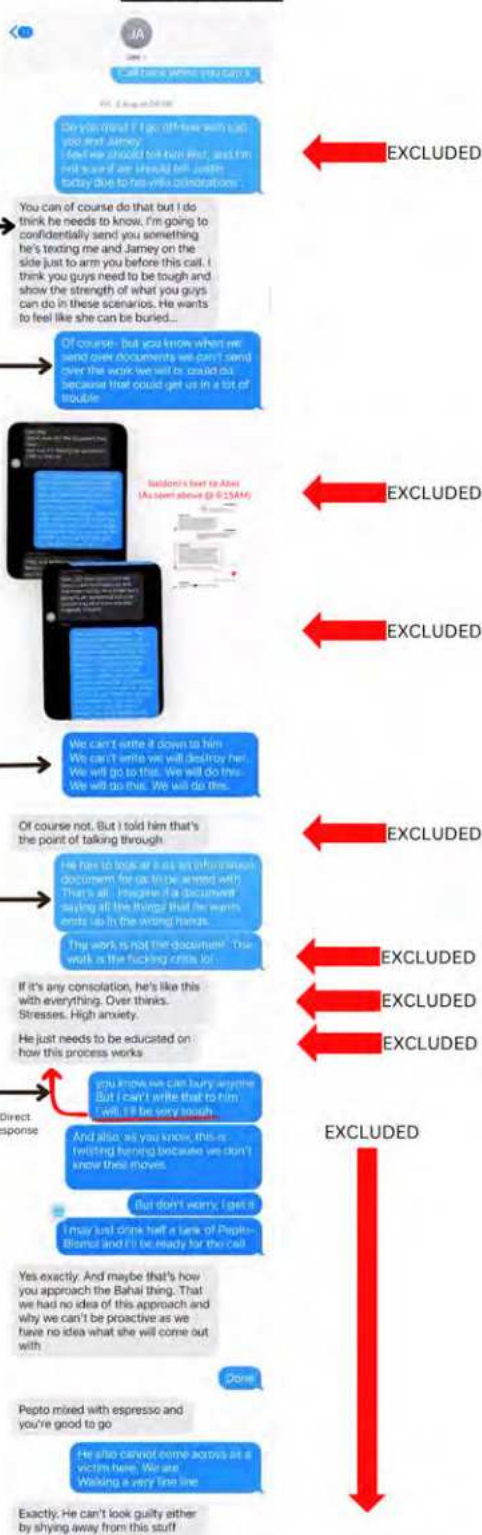


In her CRD Complaint, Lively cherry picks text messages between Abel and Nathan, stripping their exchange of critical context:

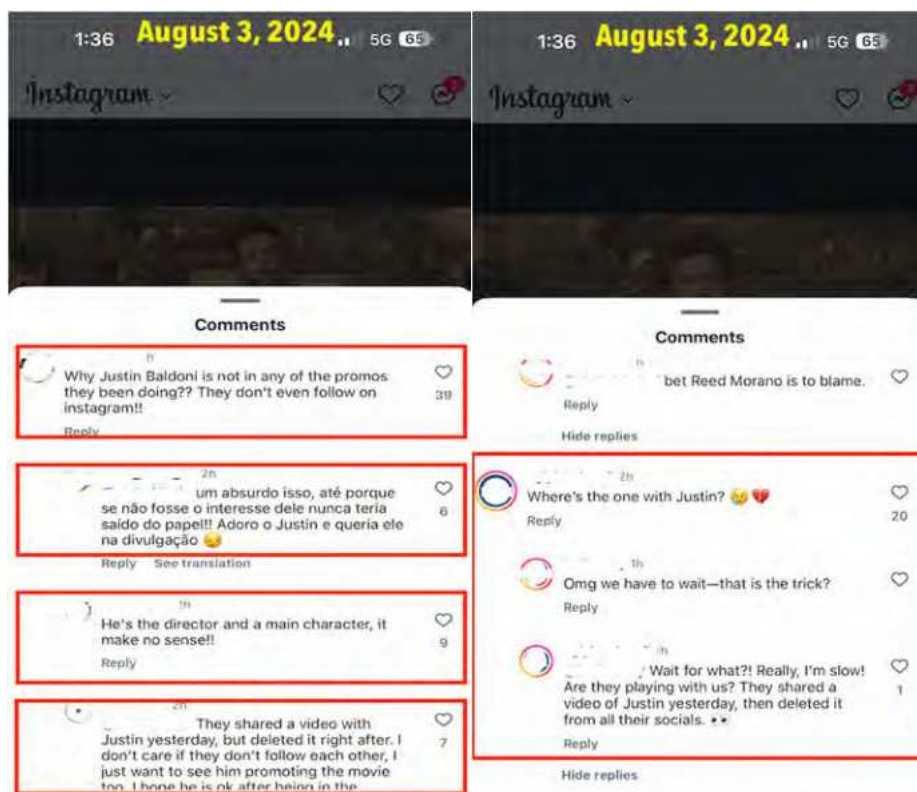
## CRD COMPLAINT



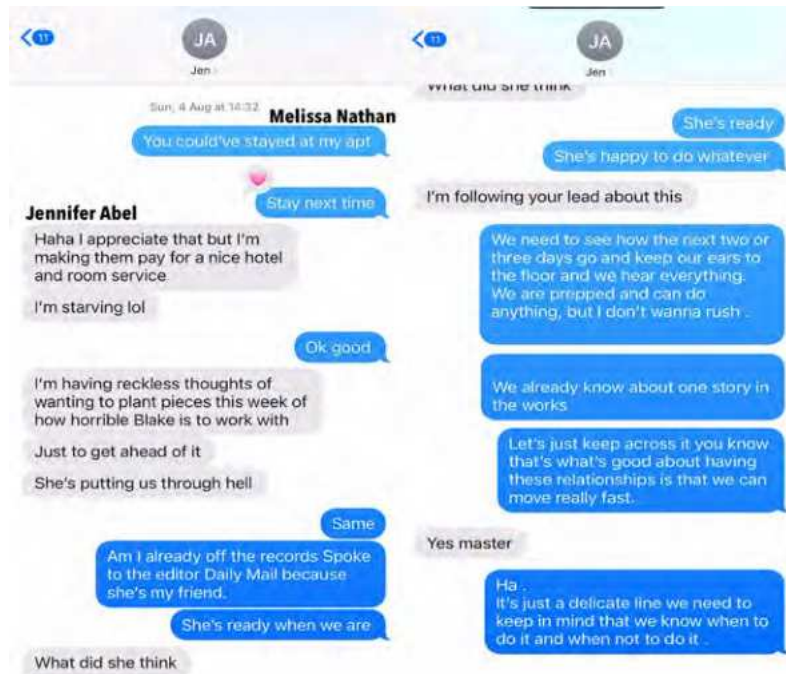
## TRUTH



**August 3, 2024:** Social media chatter begins to intensify, with users questioning, “Why is Justin not in any of the promos?”



**August 4, 2024:** Abel and Nathan commiserate about the situation, with Abel jokingly suggesting they plant negative pieces about Lively. While Nathan understands Abel’s comments are lighthearted, she responds seriously, advising they wait to see how the next few days unfold and stay vigilant. Nathan also notes being aware of a story from Lively's camp intended to hurt Baldoni's reputation. Both agree to stay alert and avoid taking any hasty actions.



**August 5, 2024:** Baldoni's first full day of press began before 6:00 AM. Later that morning, he shared a link with Abel to an article on celebrity “bullying” that had appeared on his Twitter feed. Given the circumstance that Baldoni had found himself in, the article's timing resonated with him as he was understandably feeling bullied, so he took a screenshot and sent it to Abel.





**August 5, 2024:** That evening, unbeknownst to Baldoni and Wayfarer, Lively and the rest of the cast attend a META screening of the Film at The Roxy Hotel. The event includes a Q&A session with Colleen Hoover and the cast—with everyone except Baldoni. This exclusion further highlights Baldoni’s deliberate sidelining. Fans and journalists quickly notice the absence of the Film’s director and co-lead, sparking online chatter and fueling rumors about tensions behind the scenes. The incident underscores the growing divide and continuing efforts to exclude Baldoni from the Film’s promotion.



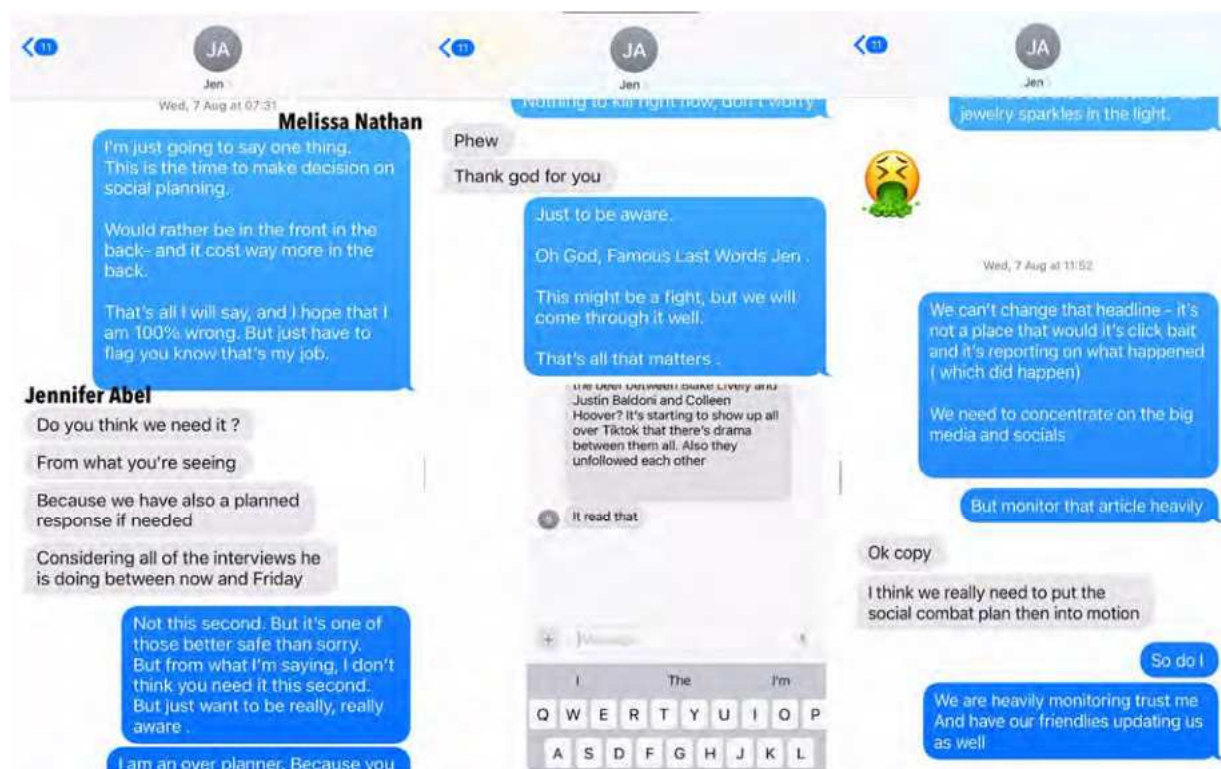
**August 6, 2024:** At the premiere of the Film in New York, Baldoni is instructed to walk the carpet separately from the rest of the cast. However, he is quickly ushered off the press line when it is announced that Lively is on her way. Once inside the theater lobby, security escorts Baldoni and his family to the basement to prevent a potential encounter with Lively and the cast. They are then taken to a basement stockroom for holding while Lively, Reynolds, and the rest of the cast walk the pink carpet. After the lobby clears, Baldoni, Heath, and their friends and family are ushered to a small theater at the end of the hallway for a separate screening.

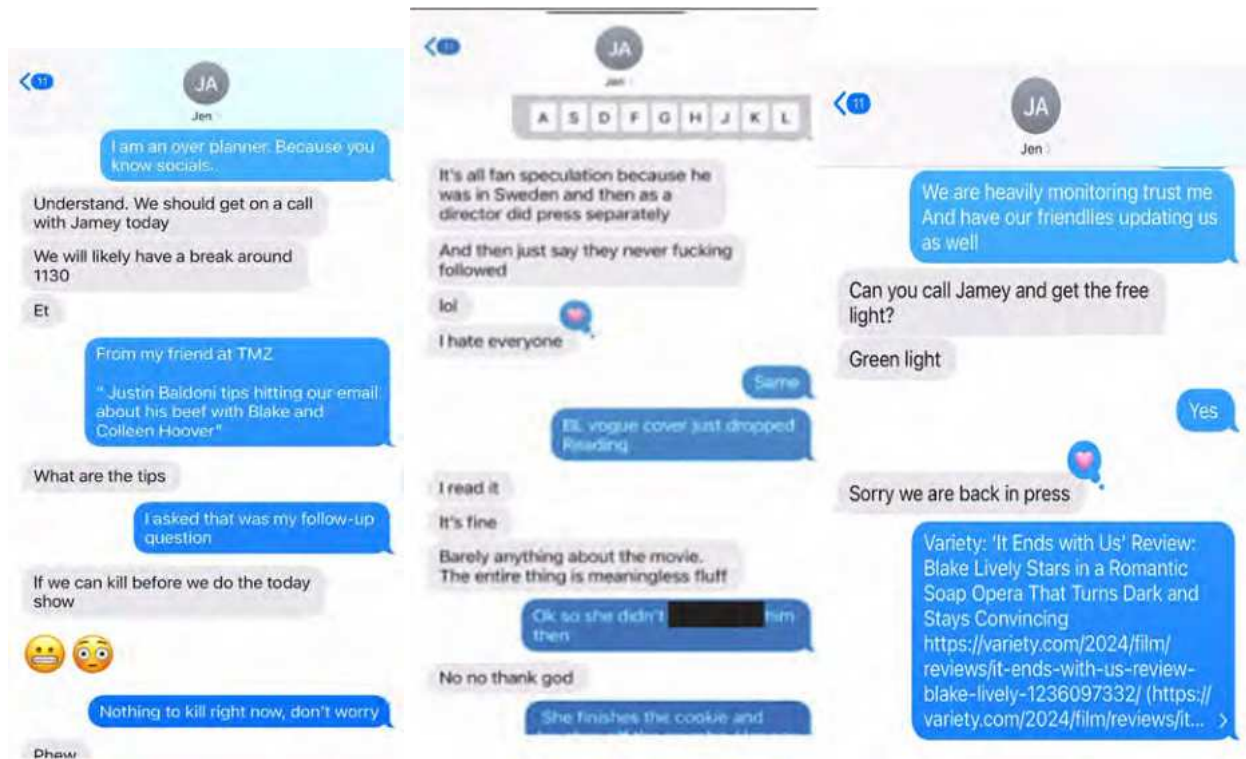


**August 7, 2024:** Articles about a potential cast feud began circulating online, and social media chatter intensifies. Audiences take notice that the cast had "unfollowed" Baldoni, and fans observe that he was absent from any promotions. This confirms Baldoni's team and Sony's long-standing concerns: the situation was overshadowing the Film. Baldoni and Wayfarer feared it would also undermine the Film's message.



**August 7, 2024:** Nathan texts Abel, “this is the time to make a decision on social planning.... Would rather be in the front [than] in the back—and it costs way more in the back.” Abel responds, “Do you think we need it?” Abel remains unconvinced that any changes are necessary. Nathan and Abel continue to do the work outlined in the TAG scope of services which at this stage involved Monitoring coverage and social conversations, correcting and updating stories & headlines in real time.





**August 8, 2024:** Online chatter escalates, and "cast tensions" become the headline across major publications.



**PEREZHILTON** | Patreon | PerezTV | Relationships

**Blake Lively**

**Daily Mail**.com

Home | Showbiz | TV | Politics | **Femail** | Royals | Sports | Health | Science | Money | U.K. | VI

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What The HECK Is Going On With Justin Baldoni & The Entire *It Ends With Us* Cast?! Blake Lively Bad Blood??

**sheknows**

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**It Ends With Us fans are convinced there's a huge feud between Blake Lively and Justin Baldoni - here's why**

- Blake, 36, and Justin, 40, didn't pose for any pictures together at the premiere
- The Gossip Girl alum also unfollowed her costar on Instagram recently

By LILLIAN GISSEN FOR DAILYMAIL.COM  
PUBLISHED: 11:20 EST, 8 August 2024 | UPDATED: 14:15 EST, 8 August 2024

Share 150 shares 87 View comments

ENTERTAINMENT / ENTERTAINMENT NEWS

**Why Fans Think Blake Lively, Justin Baldoni & the *It Ends With Us* Cast Had a Dramatic Falling Out**

by GIOVANA GELBORN AUGUST 6, 2024 AT 4:08PM EDT

**THE TAB**

NEWS ENTERTAINMENT TRENDS GAMING POLITICS OPINION

**All the juicy evidence the cast of *It Ends With Us* are secretly beefing with Justin Baldoni**

They've all suddenly unfollowed him and are skipping questions about him in interviews.

5 MONTHS AGO  
Ella Ring | Entertainment

The insanely anticipated *It Ends With Us* releases in cinemas tomorrow, but it seems there's already some major tension between the cast and Justin Baldoni, leading some fans to think a secret feud is going on behind the scenes.

And I won't lie, the evidence of a feud seems pretty convincing as the new cast and author Colleen Hoover have unfollowed Justin Baldoni, and he's being completely glossed over in interviews about *It Ends With Us*.

Justin plays the role of Ryle in the film, the love interest of Lily Bloom played by Blake Lively. Alongside starring as the main man of the film he's also the director, talk about spinning plates!



From: [REDACTED]  
 Date: Thursday, August 8, 2024 at 4:35 PM  
 To: Stephanie Jones <[REDACTED]> <[REDACTED]> <[REDACTED]>  
 Subject: Comment request RE: Justin Baldoni feud rumors

You don't often get email from [REDACTED]. [Learn why this is important](#)

Hi Stephanie [REDACTED]

I hope you are both well. My name is [REDACTED] and I'm a reporter with The Independent.

I'm approaching you for comment in regards to fan speculation that Justin Baldoni and Blake Lively had a falling out during production on *It Ends with Us*. Several fans on social media have pointed out that Lively and Colleen Hoover no longer follow Baldoni on Instagram and they have also noted that Lively and Baldoni didn't appear in photographs together at the US premiere.

Would you be willing to respond to these feud rumors?

Warm regards,



US Entertainment Reporter

The Independent  
 New York Bureau  
[independent.co.uk](https://www.independent.co.uk)



**August 8, 2024:** At 10:11 a.m. (PST), Nathan and Lively's publicist, Leslie Sloane ("Sloane"), reach an agreement whereby neither will 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 responds, "Me either." Just nine minutes later, Sloane breaches her agreement with Nathan by engaging with a reporter at the *Daily Mail*. Sloane actively continues 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 attempts to portray Baldoni as the

antagonist, stating, “The whole cast doesn’t like Justin, nothing to [sic] do with Blake.” She doubles down, insisting, “I’m telling you, she’s a liar. They are panicking as the whole cast hates him.” Sloane also threatens the reporter, saying, “The entire cast I will have go on the record... this needs to hold.”

Nathan’s texts with Sloane:



Sloane’s texts with Daily Mail reporter:



To: Leslie Sloane

Thu, Aug 8 at 10:20 AM Daily Mail Reporter

Have to talk about some stuff that came in from reporters re Blake and her new movie drama

On plane like what

Daily Mail Reporter

Well it's a lot to text but it's regarding probs on the set involving her and Justin baldoni and fallout over that with Blake being labeled difficult and a power struggle existing

That is 1000 percent untrue

But I don't want to go on record

Daily Mail Reporter

Never on record

Your info is totally off

Daily Mail Reporter

There is clearly something. Going on bc it's cold from three reporters and none of them are me

To: Leslie Sloane

Daily Mail Reporter

There is clearly something. Going on bc it's cold from three reporters and none of them are me

I'm just the only one not afraid to reach out to u lol

You have it all wrong

Your reporters are so wrong

Text Message + SMS Daily Mail Reporter

Okay I'm just Being straight up with you bc that is how I roll always. I'm coming to u bc I actually like Blake and don't want Dailymail to fuck with her. One of them said that Blake and Ryan insisted on rewriting the movie and another that she got very opinionated over directorial issues

Sent as Text Message

Do you wanna ring me when you land and I'll tell them that they need to hold off on anything for

To: Leslie Sloane

Daily Mail Reporter

very opinionated over directorial issues

Sent as Text Message

Do you wanna ring me when you land and I'll tell them that they need to hold off on anything for a few bc her rep is unavailable and need to atleast get no comment. No one knows that we speak just that you would read emails from me and respond

Sent as Text Message

Message

Yes please as thus info is all wrong

She didn't require script runs nothing to do with this She produced the film snd gad a cut

wtf is going on. The whole cast doesn't like Justin nothing yo do with Blake

Daily Mail Reporter

Like I said tho the reporting is that there were issues between her and Justin as well as others and that Justin found it difficult to work with her. One of these reporters known is close with Steph Jones bc they used to always get Tom brady Giselle shit and Steph reps him I believe... I told them she is awful and to not rely on anything she says

I'm telling you she's a liar. They are panicking as the whole cast hates him

I promise she is lying

This will not look good for your site

The entire cast I will have do on



To: Leslie Sloane

Daily Mail Reporter

always get Tom brady Giselle  
shit and Steph reps him I  
believe... I told them she is awful  
and to not rely on anything she  
says

I'm telling you she's a liar. They  
are panicking as the whole cast  
hates him

I promise she is lying

This will not look good for your  
site

The entire cast I will have go on  
record

Daily Mail Reporter

Can u give me anything at all on  
what the issue is then if it's not  
her and it's him

No im in a plane and this needs  
to hold

Daily Mail Reporter

Sounds good I'd like to clear this  
shit up

**August 8, 2024:** That same day, Jones, attempting to reinsert herself into Baldoni and Wayfarer's good graces while sidelining Abel (despite both representing the same firm), contacts a *Daily Mail* reporter about a story on Baldoni and Lively. Abel, at the direction of Baldoni and Wayfarer, previously instructed Jones not to speak to the press due to the fragile truce with Lively's team. Despite this, Jones brags to Wayfarer about "trading calls" with the *Daily Mail* to appear engaged with the account. Notably, at the time, Wayfarer and Abel were unaware that Sloane had breached her agreement with Nathan. Sloane and Sony later discover that "someone from Baldoni's team had been communicating negatively to the media." It was clear that Jones was the source, and Wayfarer's leadership, along with Sony, were livid. All parties were desperate to avoid an all-out conflict between Lively and Baldoni just as the Film was about to be released.

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.johnstxworks.com](http://www.johnstxworks.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.

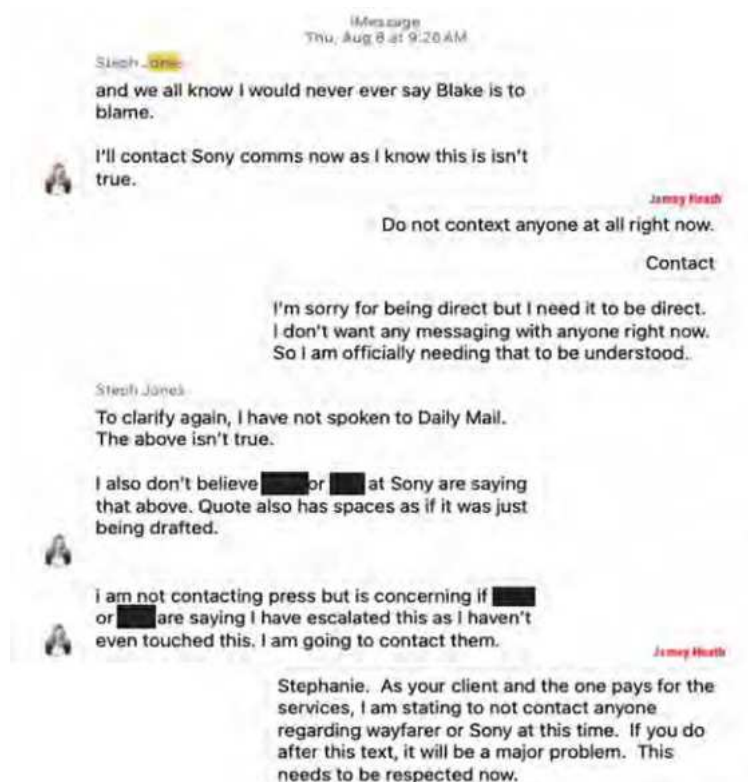
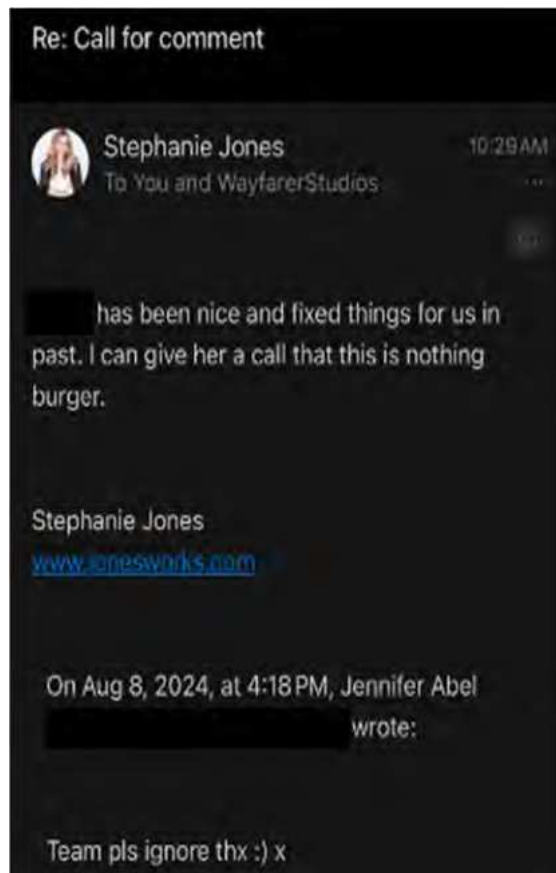
People on social media are talking about how they didn't pose together at the premiere or do any press together.

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

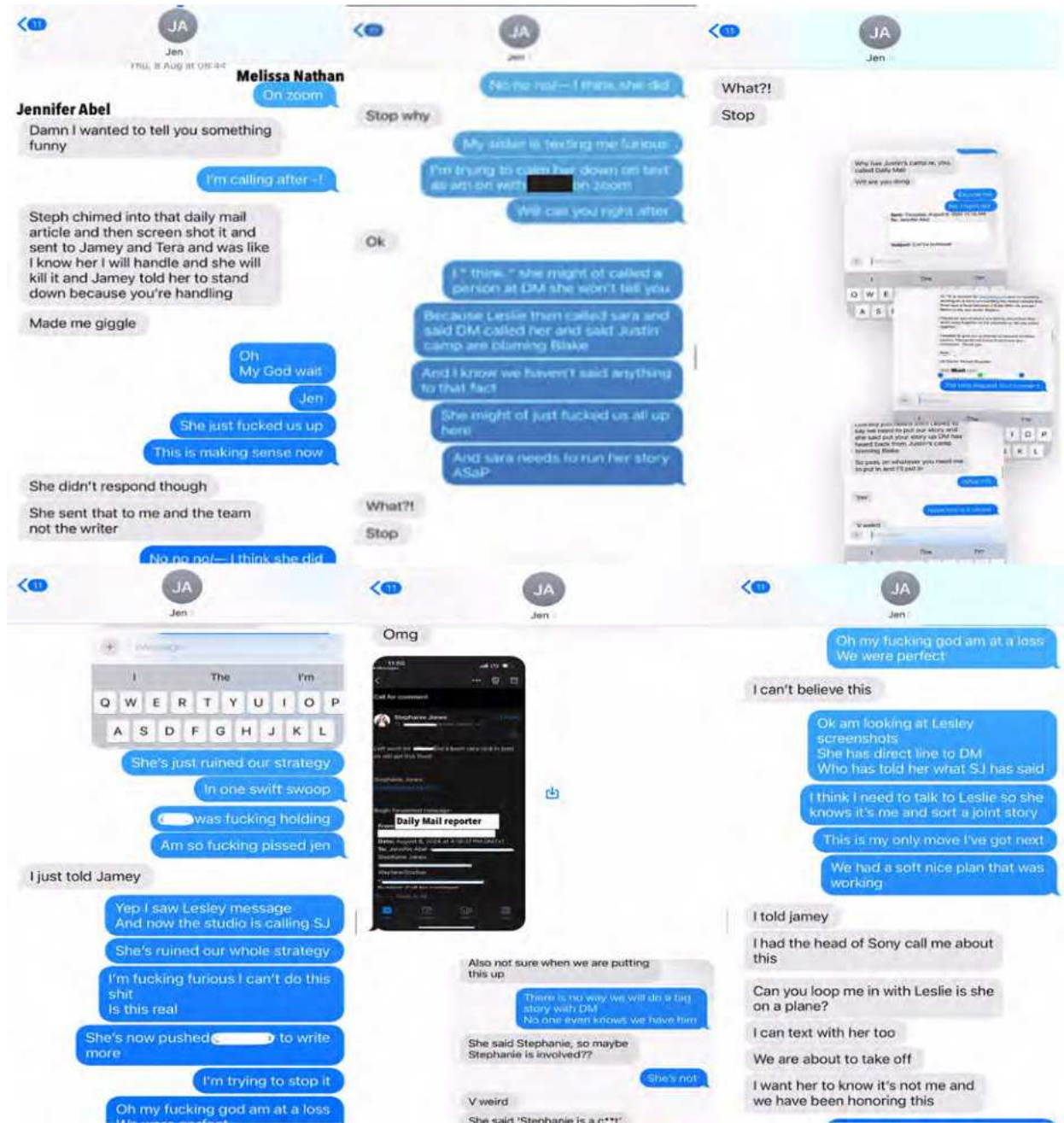
Best,

[REDACTED]

DailyMail.com  
[REDACTED]  
London | New York | Los Angeles | Sydney



**August 8, 2024:** Nathan and Abel are left to deal with the fallout from Jones inserting herself into the situation.

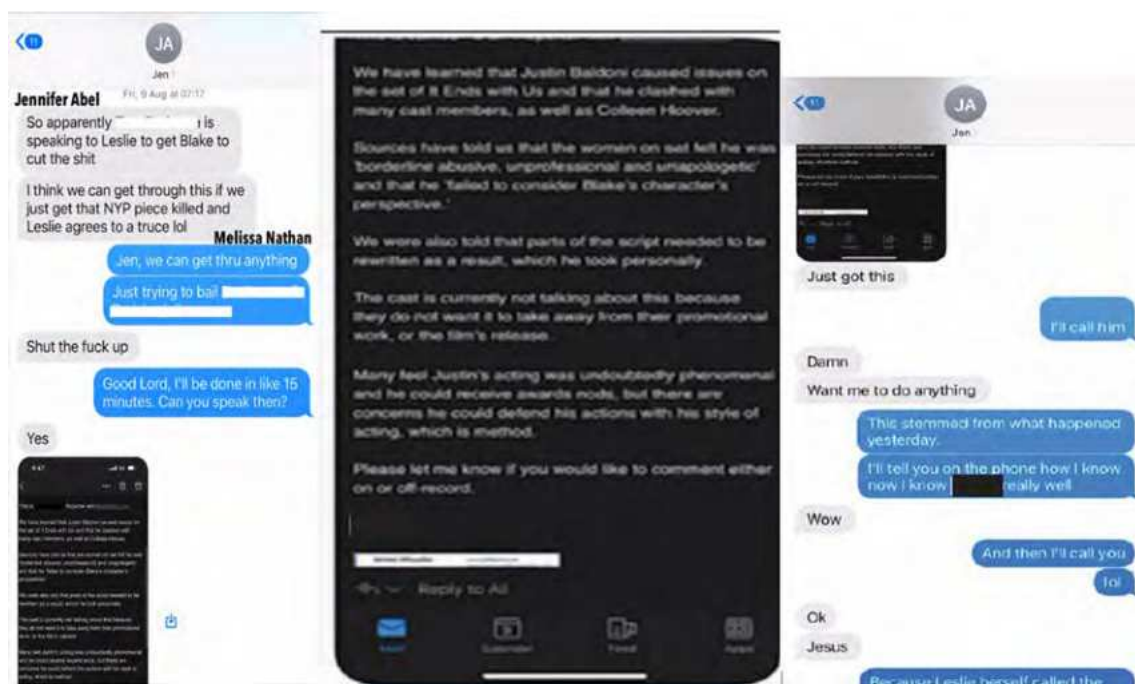


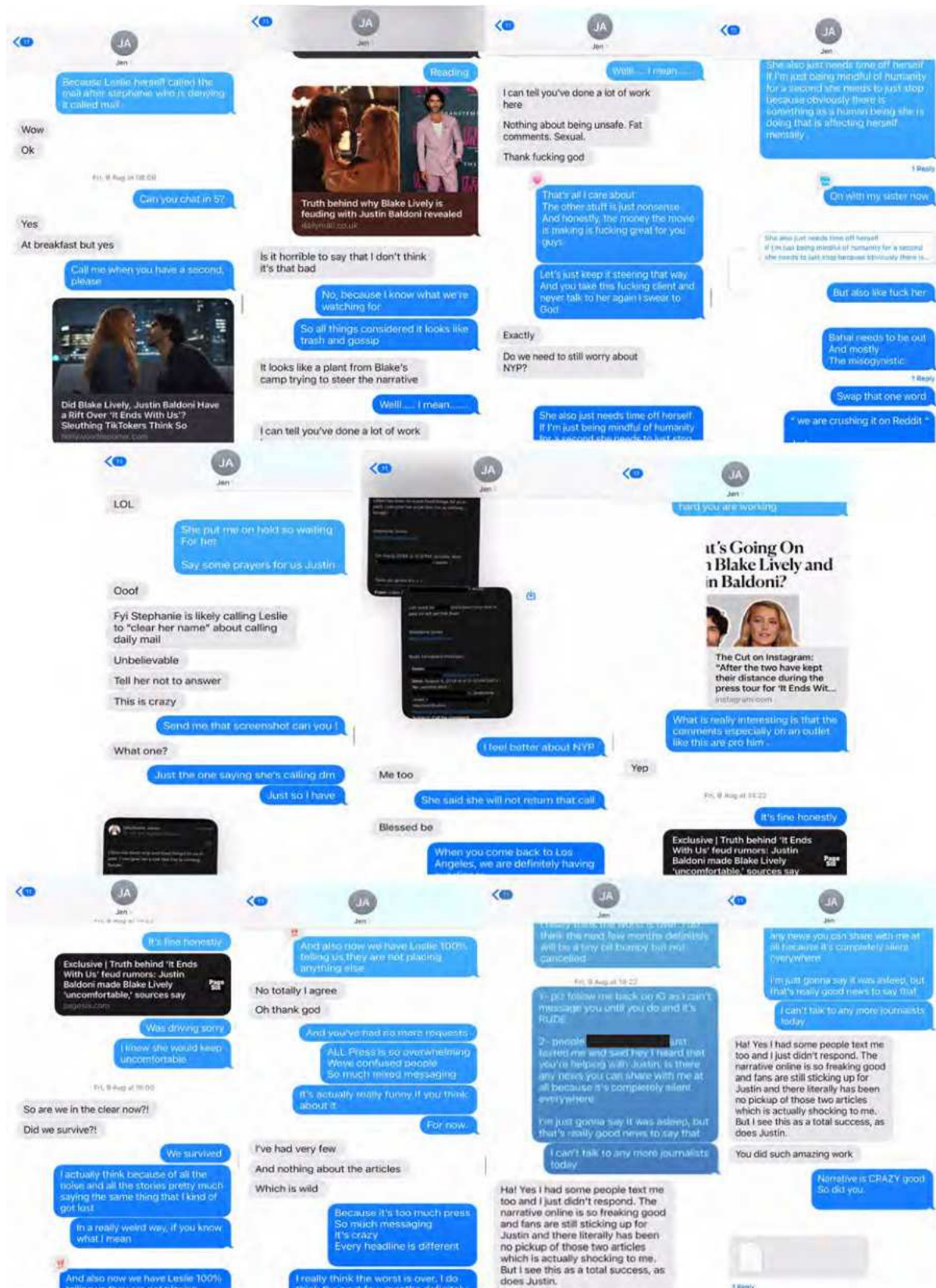




**August 8, 2024:** Crisis mitigation specialist, Jed Wallace (“Wallace”), is engaged to assess and monitor all online and offline concerns related to Baldoni and Wayfarer, specifically pertaining to information received about a developing campaign to discredit and damage Baldoni, including his Bahá’í faith, and Wayfarer. Given the importance of the Film to Baldoni and Wayfarer, its success, and the critical support it would bring to the domestic violence survivor community, Wallace is asked to focus on analyzing online feedback and monitoring the overall sentiment related to Wayfarer, Baldoni, Lively, and others working on the Film.

**August 9, 2024:** Early morning, Abel receives an inquiry from the Daily Mail.

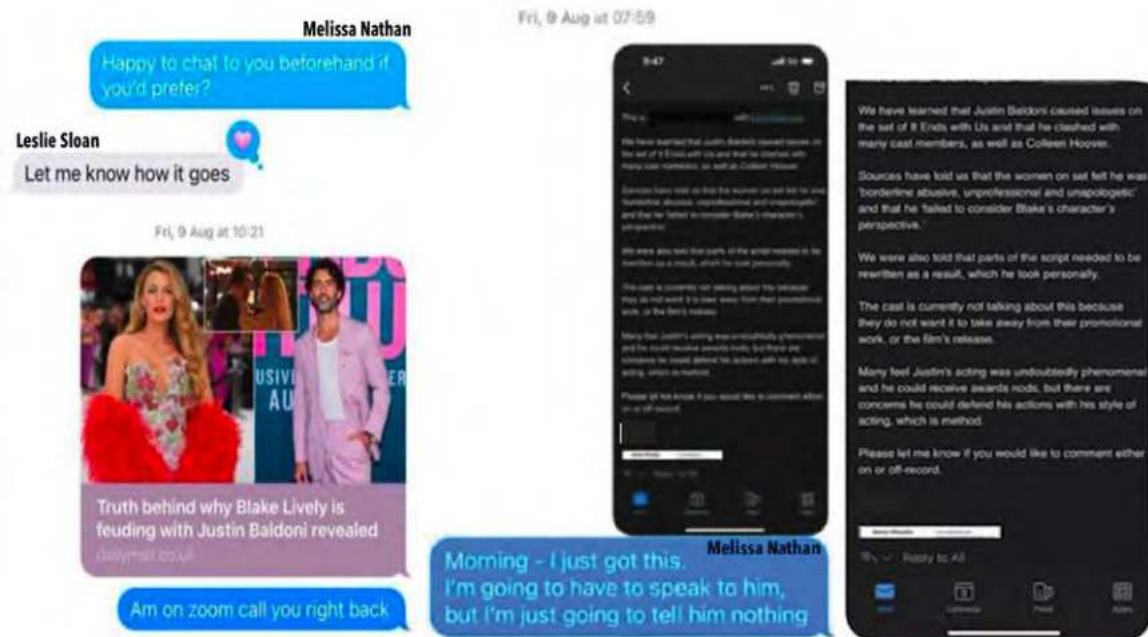






**August 9, 2024:** Heath calls Jones to clarify that, due to the sensitivity of the situation, he feels more comfortable with Abel leading communications rather than Jones. Heath reiterates that Jones should refrain from taking any action on behalf of Baldoni or Wayfarer until further notice. At the time, Heath was in Chicago with Baldoni and Abel, and they all agreed that Abel, with firsthand knowledge and the most up-to-date information, was the best person to handle communications. Jones does not take this well and launched into a tirade, insisting that she will speak to whomever she pleases, and that Wayfarer cannot stop her from "clearing her name." The day prior, Heath had texted Jones demanding that she not communicate with anyone on behalf of Wayfarer or Baldoni.

**August 9, 2024:** Nathan, consistent with the pair's agreement, sends 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 confirms that she played no part in the story and tells Sloane, "I'm going to have to speak with him, but I'm just going to tell him nothing[.]" She adds, "Happy to chat to you beforehand if you'd prefer." Sloane deliberately omits the fact that she had spoken with the reporter just 24 hours prior, stating "Let me know how it goes."



**August 9, 2024:** During a red-carpet interview at the New York premiere, Lively stated, "The iconic rooftop scene, my husband actually wrote it. Nobody knows that." This revelation regarding Reynolds' purported contribution to the script raised eyebrows 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."



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-8892864>

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]

\*referenced in complaint\*

**August 9, 2024:** On the day of the domestic release of the Film, Heath shares observations with Sony marketing, urging them to take the topic of domestic violence (DV) more seriously as part of the Film's rollout. This was a concern that Baldoni, Heath, and Wayfarer had long expressed to the team.

Observations...

External

inbox x



Jamey Heath

to

Fri, Aug 9, 2024, 8:35 PM



Sony Marketing Team

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.



itendswithusmovie and sonypict...  
It Ends With Us - Now Playing In Th...

itendswithusmovie grab your friends, wear your florals.  
#ItEndsWithUsMovie is now playing exclusively in theaters. get tickets.  
21w



@blakelively tone deaf from the beginning...wear your florals....  
3d Reply

P  
1w Reply

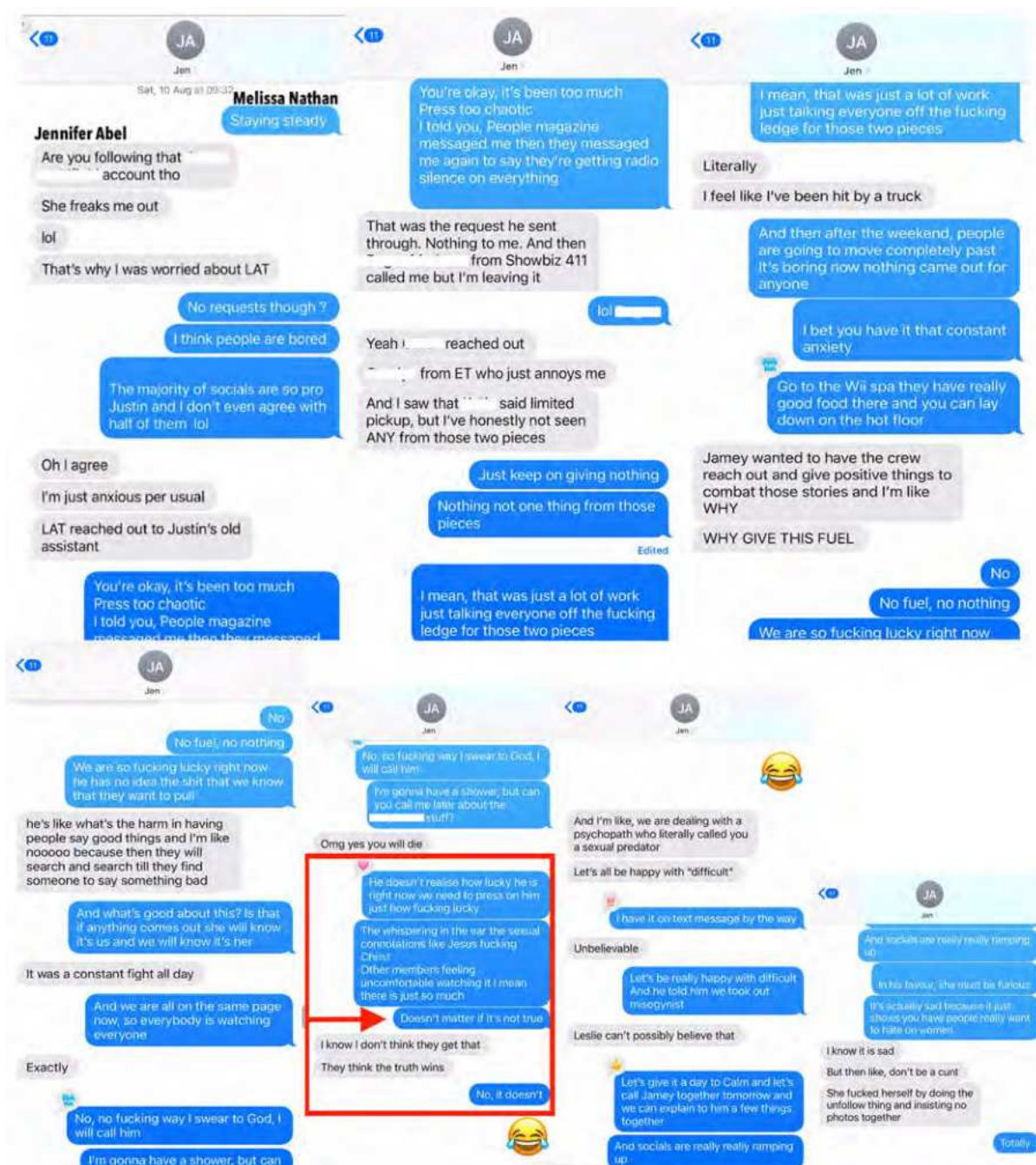
I love the movie



24,632 likes  
August 9, 2024

Log in to like or comment.

**August 10, 2024:** TAG and Abel continue to monitor online chatter about the Film.





18. The retaliation campaign relied on more than just publicists and crisis managers spinning stories. They also retained subcontractors, including a Texas-based contractor named Jed Wallace, who weaponized a digital army around the country from New York to Los Angeles to create, seed, and promote content that appeared to be authentic on social media platforms and internet chat forums. The Baldoni-Wayfarer team would then feed pieces of this manufactured content to unwitting reporters, making content go viral in order to influence public opinion and thereby cause an organic pivot. To safeguard against the risk of Ms. Lively ever revealing the truth about Mr. Baldoni, the Baldoni-Wayfarer team created, planted, amplified, and boosted content designed to eviscerate Ms. Lively's credibility. They engaged in the same techniques to bolster Mr. Baldoni's credibility and suppress any 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, 10 Aug at 09:33

**Jennifer Abel**  
Are you following that account tho

She freaks me out

lol

That's why I was worried about LAT

**Melissa Nathan**  
No requests though?

I think people are bored

The majority of socials are so pro Justin and I don't even agree with half of them lol

Oh I agree

I'm just anxious per usual

LAT reached out to Justin's old assistant

You're okay, it's been too much Press too chaotic I told you, People magazine messaged me then they messaged me again to say they're getting radio silence on everything

That was the request he sent through. Nothing to me. And then Roger Friedman from Showbiz 411 called me but I'm leaving it

Id Roger

Yeah Gillian reached out Carolyn from ET who just annoys me

And I saw that Katie said limited pickup, but I've honestly not seen ANY from those two pieces

Just keep on giving nothing

Nothing not one thing from those pieces

Edited

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

Literally

I feel like I've been hit by a truck

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

I bet you have it that constant anxiety

I bet you have it that constant anxiety

Go to the W! spa they have really good food there and you can lay down on the hot floor

Jamey wanted to have the crew reach out and give positive things to combat those stories and I'm like WHY

WHY GIVE THIS FUEL

No

No fuel, no nothing

We are so fucking lucky right now, he has no idea the shit that we know that they want to pull

he's like what's the harm in having people say good things and I'm like nooooo because then they will search and search till they find someone to say something bad

And what's good about this? Is that if anything comes out she will know it's us and we will know it's her



EXCLUDED



And what's good about this? Is that if anything comes out she will know it's us and we will know it's her

It was a constant fight all day

And we are all on the same page now, so everybody is watching everyone

Exactly

No, no fucking way I swear to God, I will call him

I'm gonna have a shower, but can you call me later about the stephanie stuff?

Omg yes you will die  
Omg yes you will die

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

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

Doesn't matter if it's not true

I know I don't think they get that  
They think the truth wins

No, it doesn't

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

Let's all be happy with "difficult"

I have it on text message by the way

Unbelievable

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

Leslie can't possibly believe that

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

And socials are really really ramping up

In his favour, she must be furious, in his favour, she must be furious

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

I know it is sad

But then like, don't be a cunt

She fucked herself by doing the unfollow thing and insisting no photos together

Totally



EXCLUDED



INCLUDED IN CRD COMPLAINT



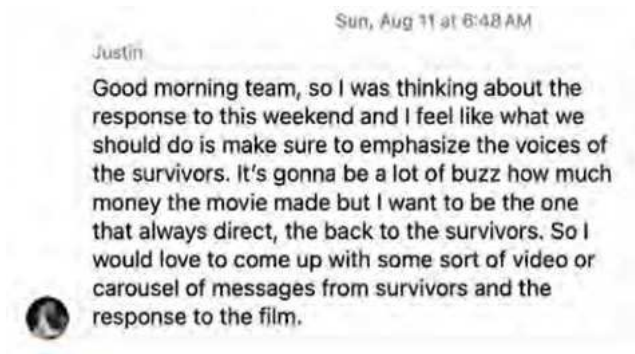
INCLUDED IN CRD COMPLAINT

EXCLUDED

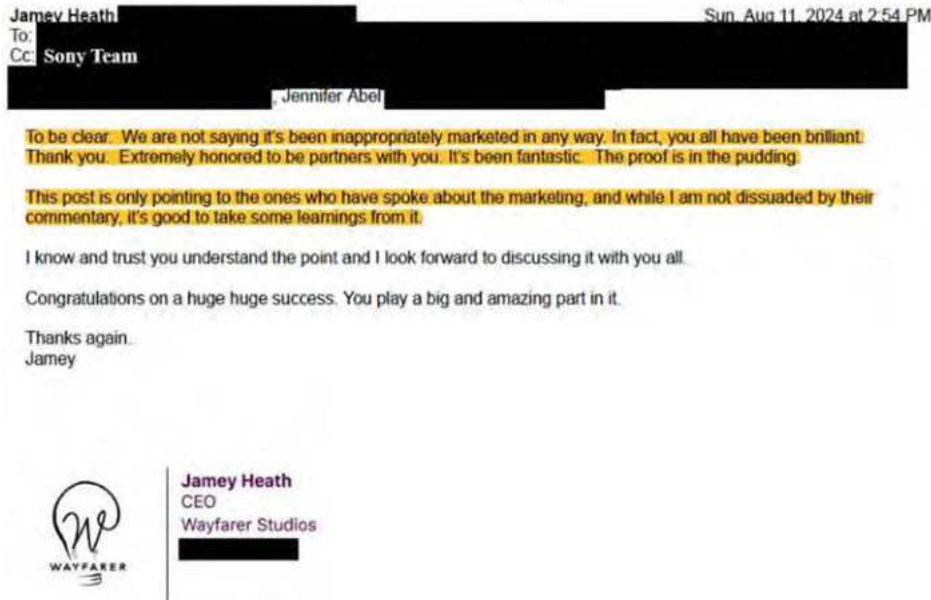


INCLUDED IN CRD COMPLAINT

**August 11, 2024:** Baldoni felt it was important to stay on message, as he had during the Film's junket press tour from August 4–9th. Despite a purported “feud” or the focus on the Film's box office success, Baldoni sought to redirect attention to domestic violence survivors. He sends a text to the social media team, urging them to focus their efforts on this topic.

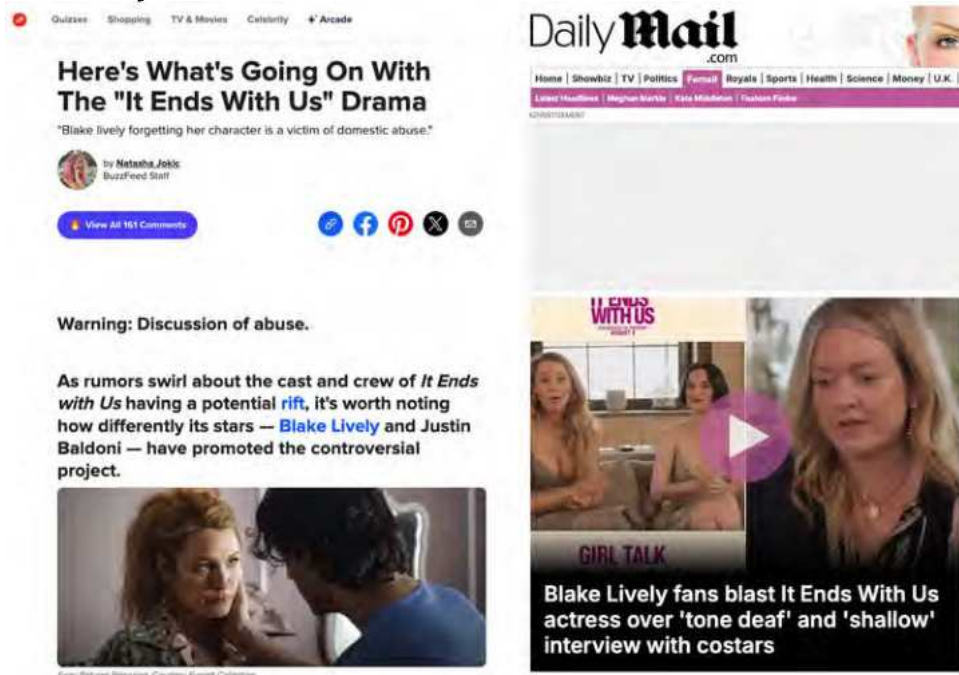


**August 11, 2024:** Heath follows up on his email to Sony from August 9, 2024, expressing his gratitude for the team's efforts in making the film a box office success. He requests, however, that they schedule a call to discuss the Film's messaging.



**August 12, 2024:** Organic articles emerged directly related to how Lively was promoting the Film. 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>; 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>



**August 12, 2024:** WME, Abel, and Heath discuss a yet another conversation between WME and Reynolds. WME shares that Reynolds and Lively are furious with Wayfarer and Baldoni for positioning them as promoting the Film as a “Barbie film” while elevating Baldoni to speak on the more serious messaging. Reynolds and Lively purportedly believe Nathan is responsible for this positioning and demand that Wayfarer release a statement of contrition, taking accountability for the negative press toward Lively and Reynolds. They warn WME that absent compliance, the “gloves will come off.” In turn, Reynolds tells WME that he would personally draft a statement for Wayfarer to release immediately. Heath and Abel are astounded that Reynolds and Lively blame Baldoni and Wayfarer for their self-inflicted PR nightmare. Heath had consistently communicated that neither Wayfarer, Nathan, nor anyone on their team was manipulating the internet, using bots, or seeding stories about Lively’s or Reynolds’ character. All press stories were organic and directly resulted from Lively’s own tone-deaf marketing approach.

**August 12, 2024:** That evening, two WME executives, Heath and Abel participate in a call to review the statement drafted by Lively and Reynolds on behalf of Baldoni, Heath, and Wayfarer. Upon review, WME concurs with Wayfarer that the statement was vague, implies culpability without substance, and fails to address the issues at hand. Furthermore, if the goal was to mitigate negative online attention directed at Lively, the statement would have the opposite effect. In response, Wayfarer, Baldoni, and Heath reject the demand, firmly refusing to issue any statement falsely assuming responsibility for non-existent issues.



**August 12<sup>th</sup>, 2024**

**Statement prepared by Blake Lively and Ryan Reynolds on behalf of Baldoni, Heath and Wayfarer**

*IT ENDS WITH US was a troubled production which we take full accountability for. We are very sorry to everyone we caused upset to privately and publicly.*

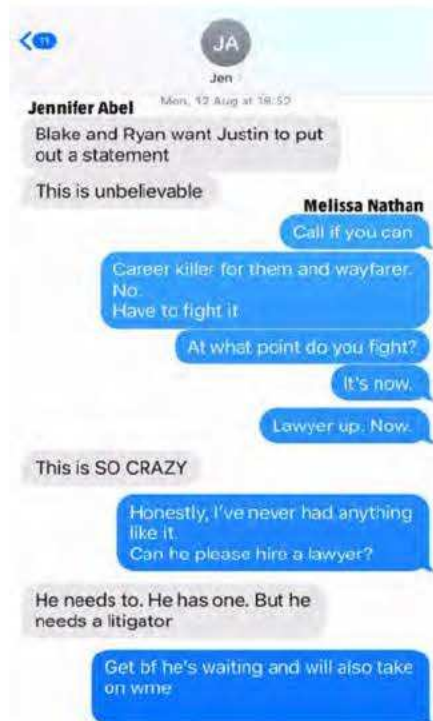
*Blake Lively, Colleen Hoover, the entire cast and crew led with professionalism every step of the way, any negativity aimed at them is ours to own.*

*We mutually agreed that the cast would be promoting the film separately and understood why. We have always said we are not perfect and even if unintentionally make mistakes, we will always own them. We hold ourselves accountable, it's not anyone's job but ours and that's part of being "man enough". We will practice what we preach. We are learning and growing from the experience and we thank everyone for their patience as we find a better way to proceed. We are very proud of the film and the welcome arms that it's been received. Part of our work is to have uncomfortable conversations for public growth. The film is doing that on screen and we are doing that off screen.*

*Thank you to the cast crew and public for the opportunity to be imperfect and to be given the space to learn and grow.*

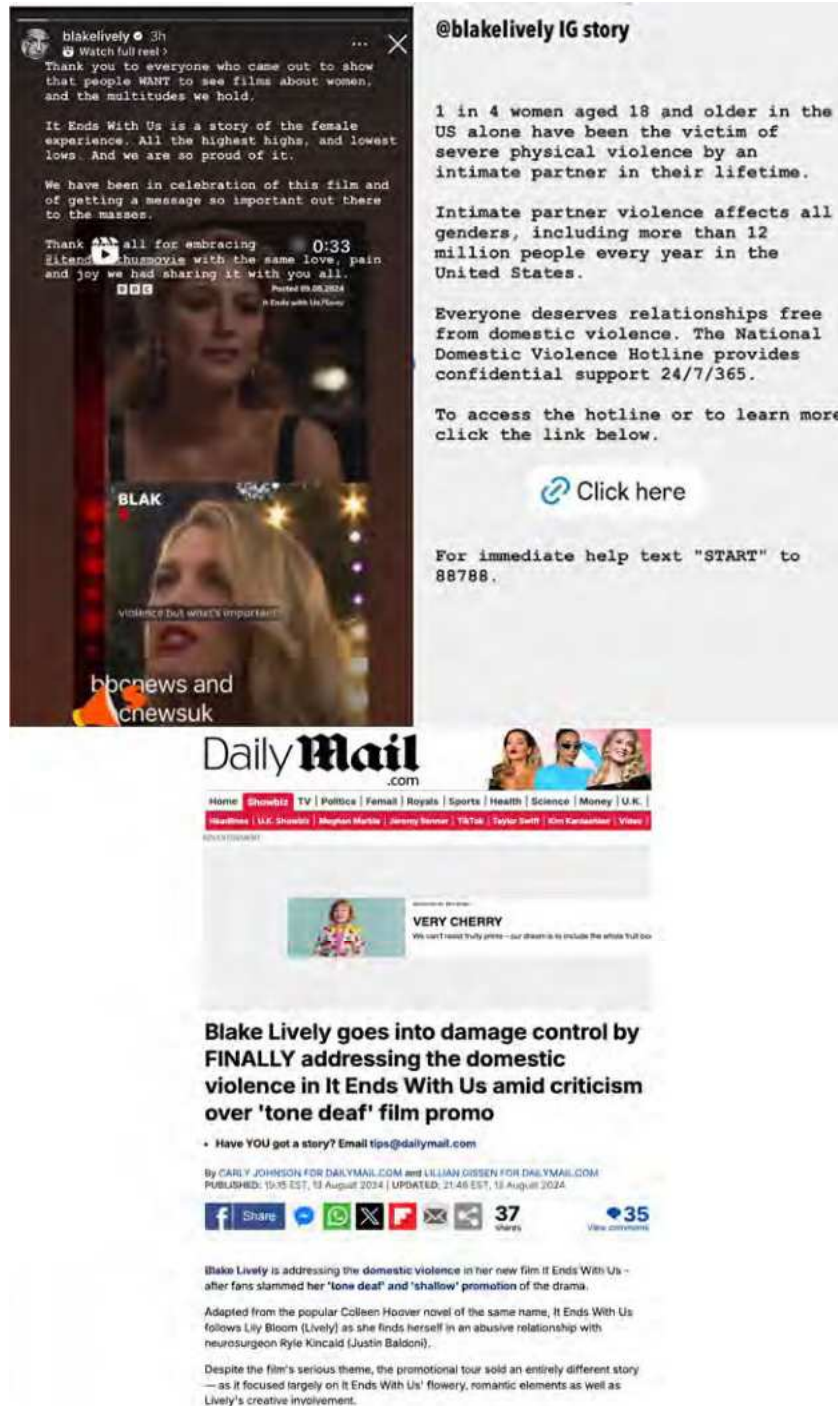
*With humanity and dedication,*

**August 12, 2024:** Abel shares with Nathan that "Blake and Ryan want Justin to put out a statement." Both are shocked by the request and state that they have never encountered anything similar. Nathan advises Baldoni to retain legal counsel immediately.



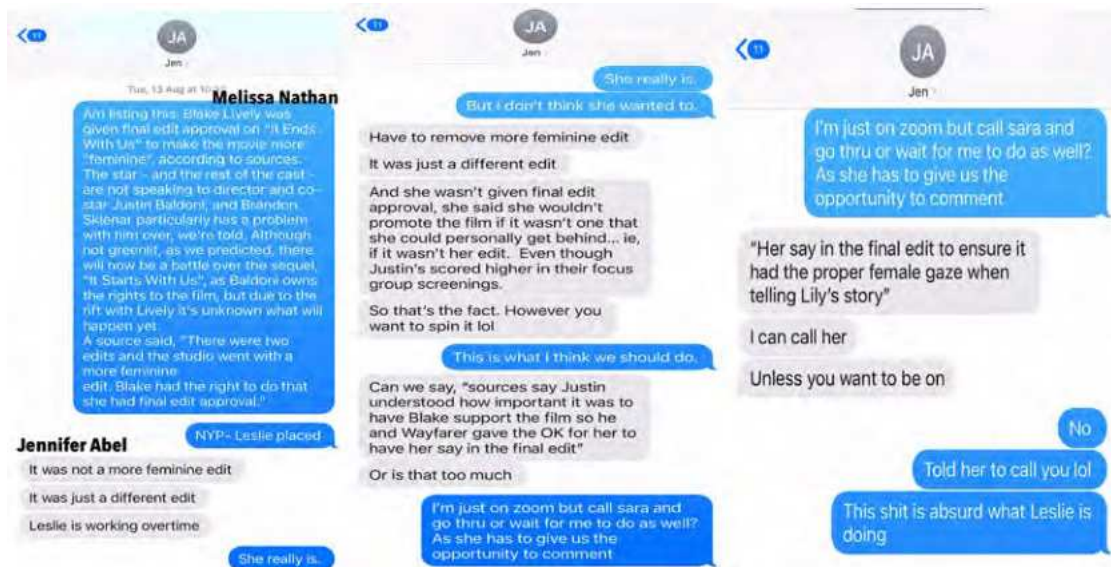


**August 13, 2024:** The *Daily Mail* publishes an article titled, “Blake Lively goes into damage control by FINALLY addressing the domestic violence in *It Ends With Us* amid criticism over ‘tone deaf’ film promo.” This follows Lively’s post to moviegoers, which includes statistics on domestic violence and a link to resources for support. The information remained on her story for 24 hours.

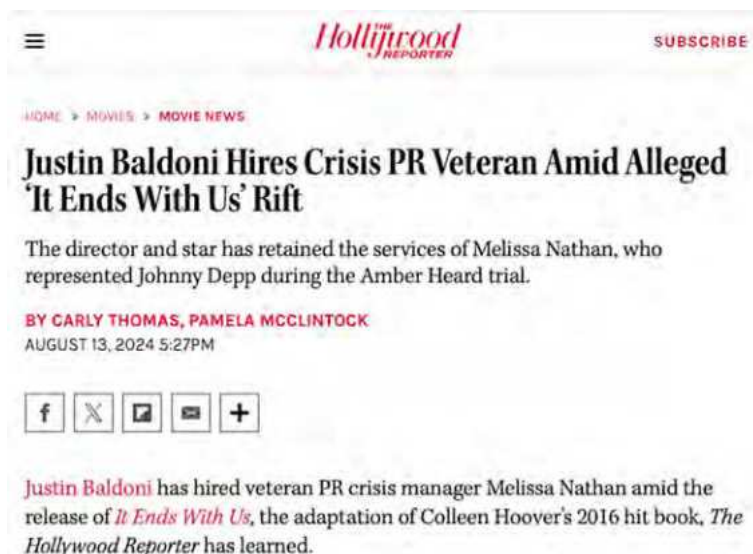


**August 13, 2024:** The *New York Post* contacts Nathan for a comment regarding competing cuts and on-set feuds. The information provided is inaccurate. Lively did not have final edit approval,

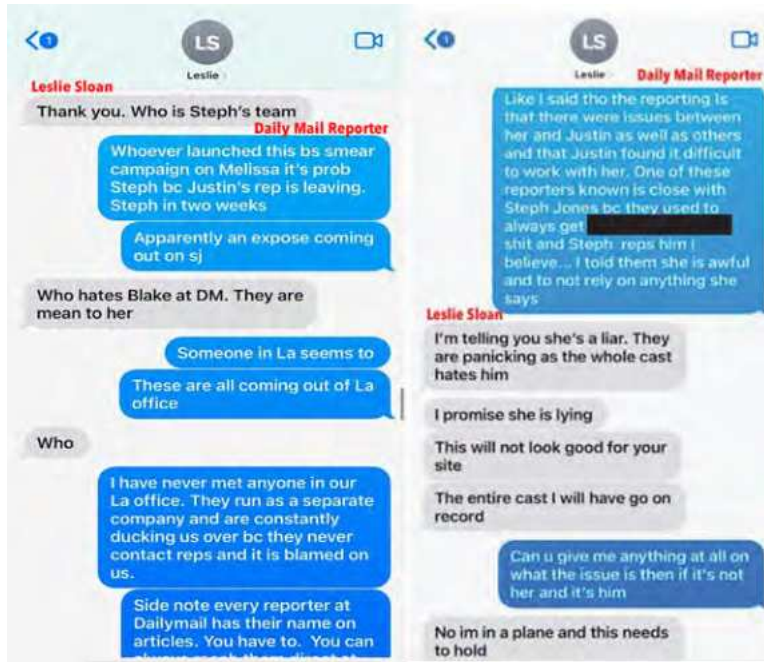
nor was she given Sony's cut. In reality, Sony did not have a studio cut; rather, Wayfarer and Sony shared a studio cut. Should the director's cut not perform well in audience screenings, the studios collectively held the right to recut the Film. However, this never occurred, as Lively used her promotional efforts to secure the final cut. All the information Leslie provided to *The New York Post* was false and misleading.



**August 13, 2024:** *The Hollywood Reporter* publishes a story naming Nathan as Baldoni's crisis PR representative, drawing a comparison between Baldoni and Nathan's previous client, Johnny Depp. This comparison proves damaging for Baldoni, as Nathan was hired specifically to ensure that the truth would be communicated, free from interference by Lively's team.



**August 8, 2024:** Sloane has a text conversation with a *Daily Mail* reporter who spoke to Jones. Jones, acting independently, had reached out to the *Daily Mail* seemingly on her own initiative and in direct disregard for Heath's previous request to say nothing.



**August 14, 2024:** As discussed hereinabove, in early August 2024, Jones inserted herself into the situation, attempting to sideline Nathan and Abel. The issue, however, was that Jones had deliberately distanced herself from Wayfarer leadership's communications strategy and internal decision-making, citing her focus on higher-profile clients. Wayfarer had no objection to Jones' disengagement, as Abel was their trusted advisor, and they had no interest in becoming entangled in Jonesworks' internal politics. Furthermore, Jones had been on a family vacation during the critical period of the press campaign and Film premiere. Despite her physical distance, Jones' attempts to intervene were clumsy, unwelcome, and sporadic. As she tried to create drama and undermine Abel's authority, Wayfarer and Baldoni remained focused on managing the crisis at hand. On August 14, 2024, in a final effort to position herself as the "key player" for Wayfarer's account, anticipating Abel's imminent departure from Jonesworks, Jones sent a disorganized strategy outline and includes a veiled threat to Wayfarer, reminding Heath of their contractual agreement.

**WAYFARER**

Jamey Heath

**Re: Blake Lively Felt Justin Baldoni Fat-Shamed Her, Kissed Too Long During Scene**

3 messages

Stephanie Jones &lt;[REDACTED]@jonesworks.com&gt;

Wed, Aug 14, 2024 at 11:29 AM

To: Jamey Heath

Cc:

Jones attorney

Hi Jamey,

I have been standing down and have not contacted any press at all regarding any of these Justin issues since they arose on Thursday of last week while I was on family vacation in Europe. I wanted to take a moment to reiterate my commitment to Justin and our work together. Over the past eight years, I have successfully managed every crisis for Justin without any negative press coming to light. As a key member of both Justin's and Wayfarer's account since we signed him, I believe if one of our team members, including me as a keyman on Justin's account, can rectify a story, it's essential we leverage that for Justin and Wayfarer.

While my background isn't solely in crisis management, I have extensive experience representing our billionaire clients, many of the biggest stars and athletes in the world, as well as many of our Fortune 50 founder clients. This experience has equipped me with the skills necessary to navigate complex situations effectively, often more diligently than the crisis pr firms we have worked with in the past.

My recommended strategy would be twofold:

1. **"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.
2. **"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.

As you know, I've been on vacation in Europe with my entire family. I've attached my Verizon call log from last week in response to your claim that someone at Sony suggested I called the Daily Mail and escalated things. I can confirm that I did not make or receive any calls from Daily Mail - the number I thought I returned call from was regarding our client [REDACTED] from Daily Mail's cell number is noted in her email - [REDACTED] and you can cross-reference this against my call log for verification that she did not call me, nor did I call her

Studios often look for leaks, which is why per Jen Abel's text to all of us, the Sony President first texted Jen Abel, and in her words "accused her of leaking information to the Daily Mail". He then text me shortly thereafter. I ask that you please refrain from using me as a scapegoat for leaks that are clearly originating from elsewhere.

I am ready, willing, and able to fulfill my duties to support Justin per our contract which concludes May 2025.

I can add tremendous value to our efforts, and I hope you will reconsider my involvement.

Thank you,

Stephanie Jones

**August 14, 2024:** A journalist from TMZ contacts Nathan and Abel, requesting comment regarding "three HR complaints filed against Justin Baldoni on set of 'It Ends With Us'". That same day Nathan receives inquiries from reporters about multiple HR complaints from set. This was not true.



From: [REDACTED] <[REDACTED]@tmz.com>  
 Date: Wednesday, August 14, 2024 at 11:45 AM  
 To: WayfarerStudios <[REDACTED]>  
 Subject: Statement for TMZ

Some people who received this message don't often get email from [REDACTED] [Learn why this is important](#)

Hello,

I'm a reporter at TMZ and I'm reaching out to get a statement regarding some information.

We are being told there were at least three HR complaints filed against Justin Baldoni on set of 'It Ends With Us'.

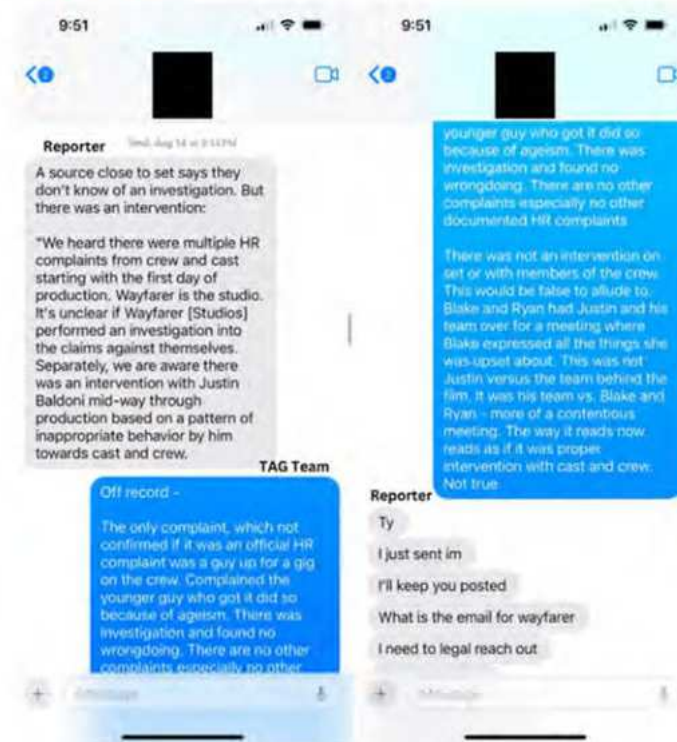
We wanted to see if the complaints were investigated and what the results were.

Thank you,

**Senior News Producer**

Office: [REDACTED]

Cell: [REDACTED]



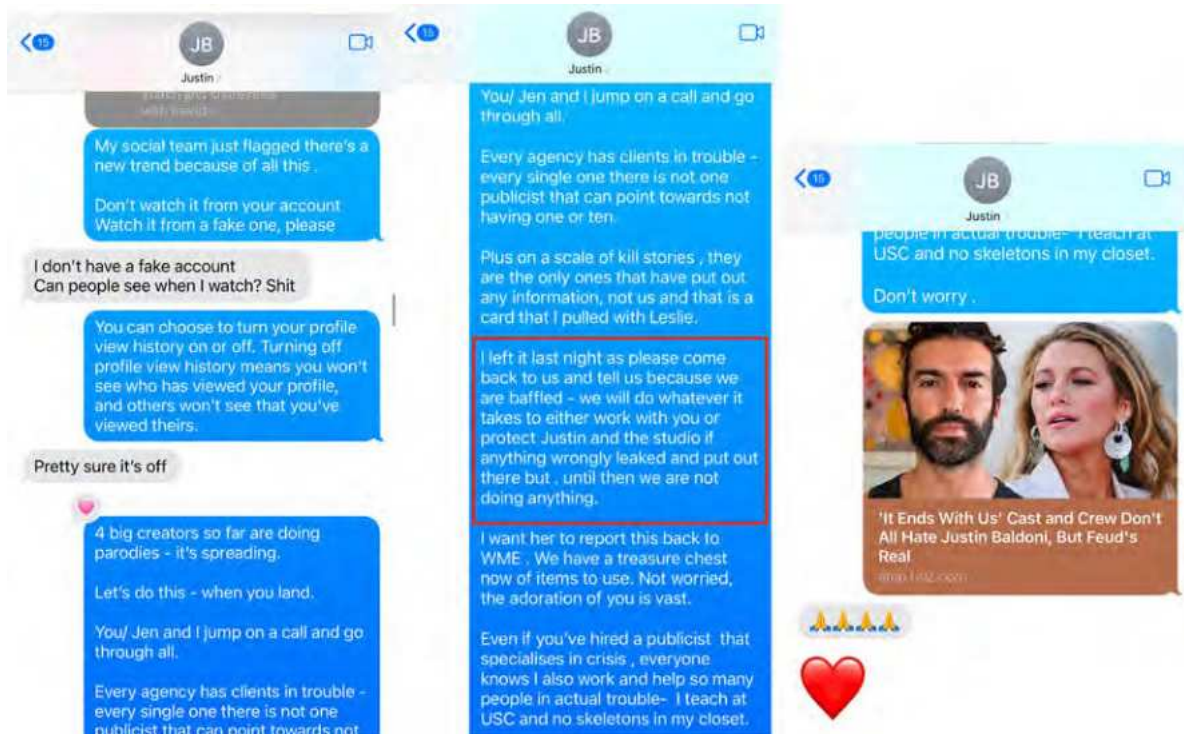
**August 14, 2024:** Baldoni sends Abel a TikTok from a creator suggesting that Baldoni is involved in "something bad." Baldoni is just as confused as the rest of his team about the nature of this "bombshell." Abel replies, "That is the question of the century" and reassures him, saying, "There is no bombshell, as you know," while confirming that she and the team are closely monitoring the situation in case a response is needed.



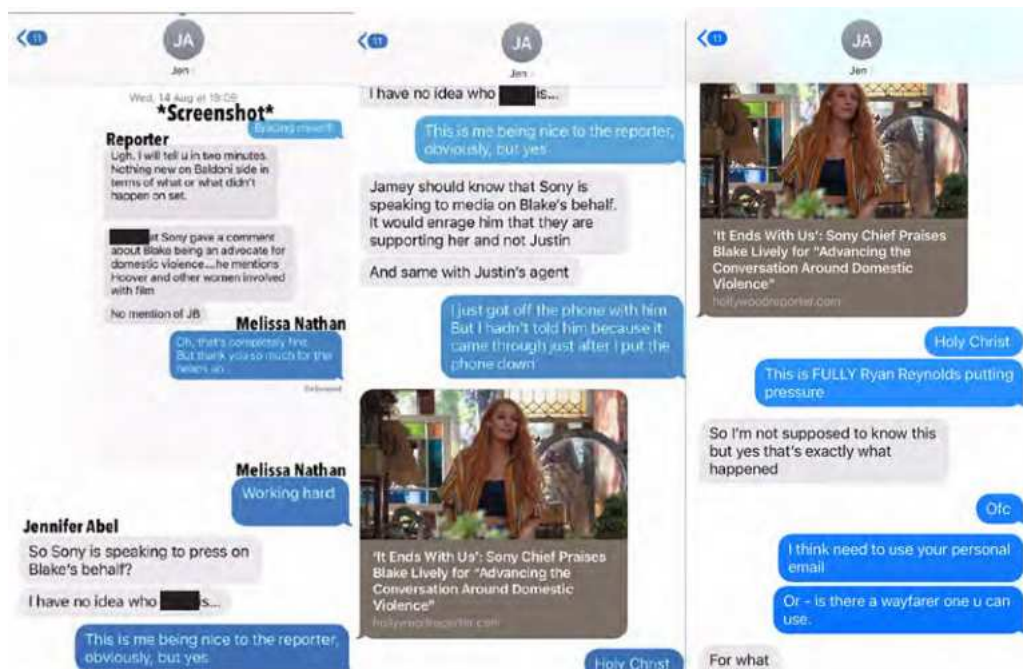
**August 14, 2024:** Baldoni texts Nathan seeking clarity on what is happening, what the strategy is, and how the ongoing "feud" can be resolved. Nathan explains that she spoke with Sloane and asked her for her perspective on a solution. Nathan observes that when Baldoni "is respectful, they (Reynolds and Lively) don't like it," and when he plays by "their" rules, they still don't approve. She questions, "What do they want?" Nathan further clarifies to Baldoni that she left the matter with Sloane, asking her to indicate what course of action she prefers. Nathan emphasizes that she is willing to work with Sloan, either collaboratively or to protect Baldoni and Wayfarer. Until something is leaked or wrongfully put out by Lively's team, Nathan and her team will not take further action.







**August 14, 2024:** Nathan receives word from a reporter that "Sony chief" Tony Vinciguerra made a statement about Lively "being an advocate for domestic violence," with no mention of Baldoni in the piece. Nathan immediately senses Sloane's involvement in this development. However, Abel suggests that it is Reynolds who likely pressured Sony into issuing the statement.

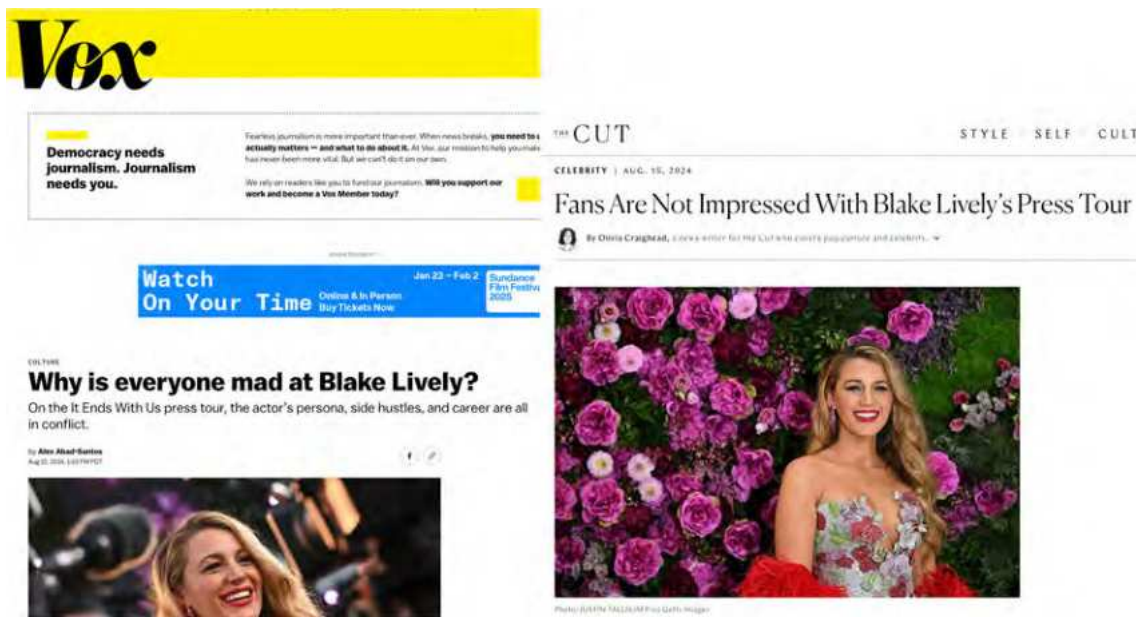




**August 14, 2024:** Organic articles come out in response to Lively's promotion of the Film. See, e.g., Elyse Wansehl, *People Are Disgusted By Blake Lively's Cutesy Press Tour For 'It Ends With Us'* (Aug. 14, 2024), [https://www.huffpost.com/entry/blake-lively-press-tour-it-ends-with-us-backlash\\_n\\_66bcf45ee4b03da4fc01cd28](https://www.huffpost.com/entry/blake-lively-press-tour-it-ends-with-us-backlash_n_66bcf45ee4b03da4fc01cd28); 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/>.



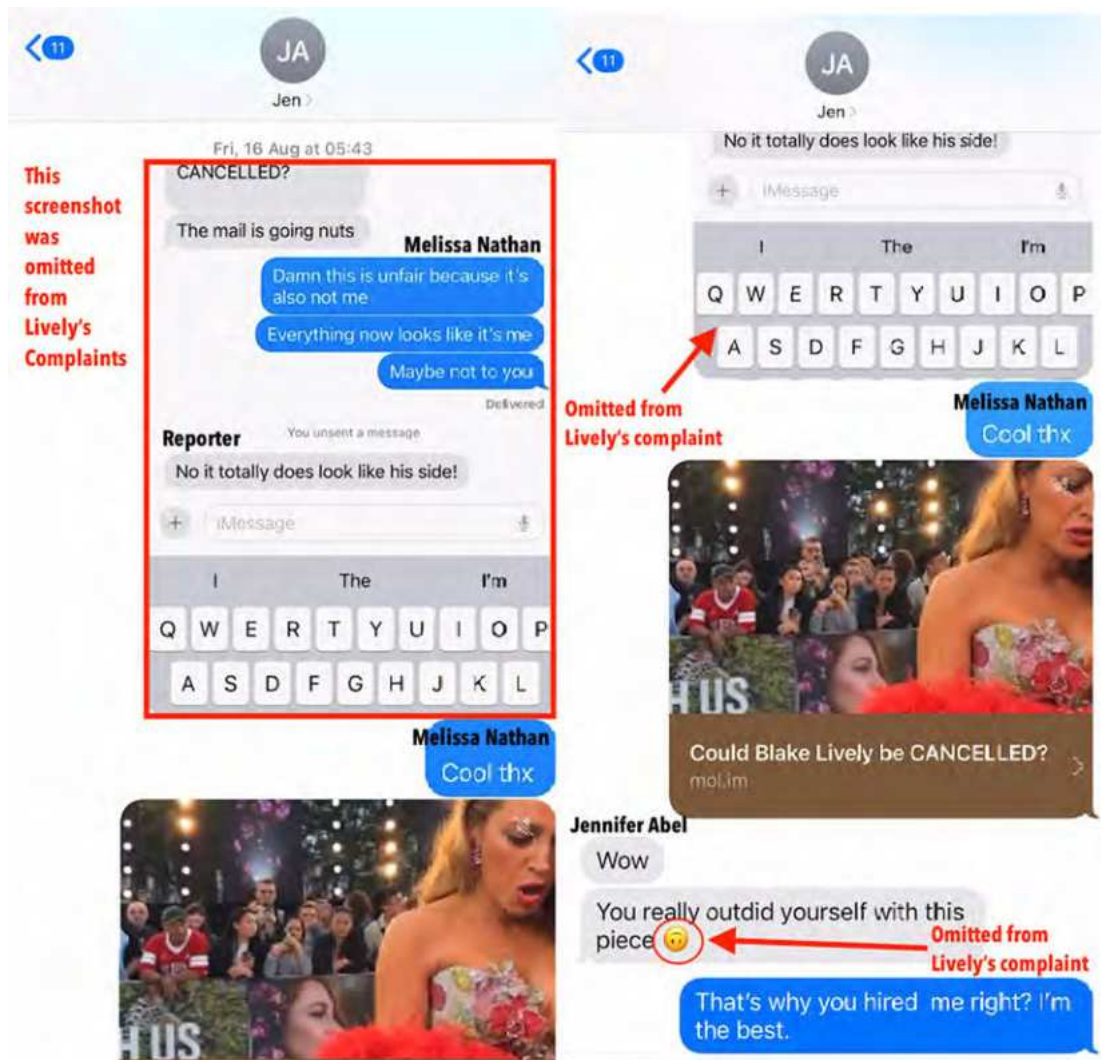
**August 15, 2024:** More organic articles come out in response to Lively's promotion of the Film. See, e.g., Alex Abad-Santos, *Why is everyone mad at Blake Lively?* (Aug. 15, 2024), <https://www.vox.com/culture/367451/blake-lively-it-ends-with-us-press-tour-controversy>; Olivia Craighead, *Fans Are 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>.

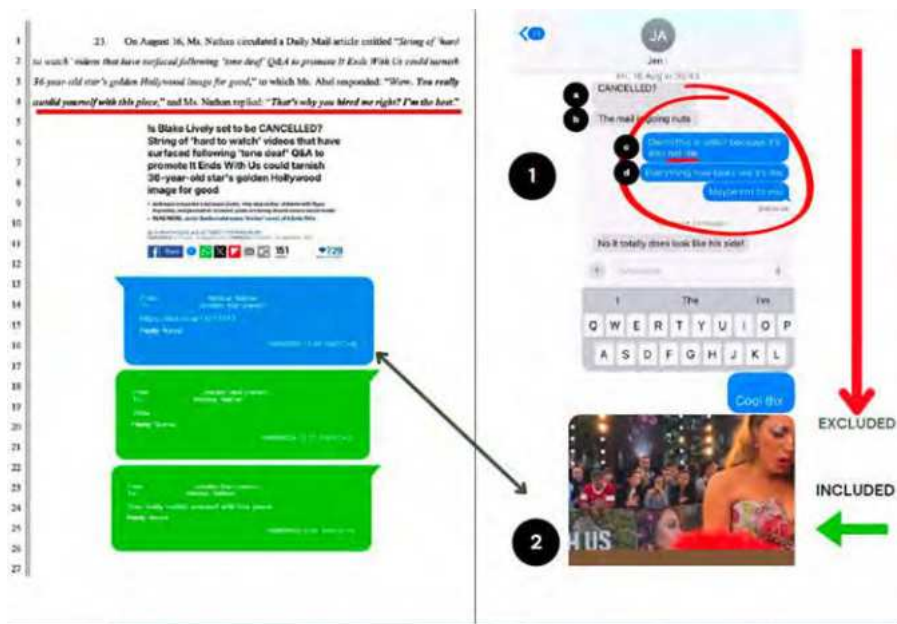


**August 16, 2024:** More organic articles come out in response to Lively's promotion of the Film. See, e.g., Carolyn Gevinski, *The It Ends With Us promo has failed domestic violence survivors like me* (Aug. 16, 2024), <https://www.glamourmagazine.co.uk/article/it-ends-with-us-domestic-abuse-first-person>.

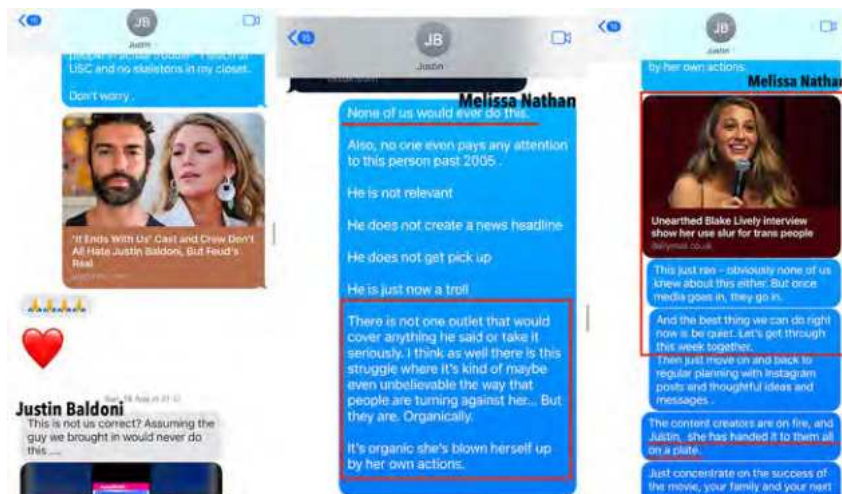


**August 16, 2024:** Nathan receives a message from a reporter about a story from the Daily Mail: “Could Blake Lively be CANCELLED?” Nathan, realizing that the article could give the impression of having been planted by her, laments, “Damn this is unfair because it’s also not me[.]” The reporter responds, “no it totally does look like his side”. Nathan shares a screenshot of her conversation with the reporter with Abel. The two of them sarcastically joke, “You really outdid yourself with this one[.]” Nathan responds “That’s why you hired me right?”

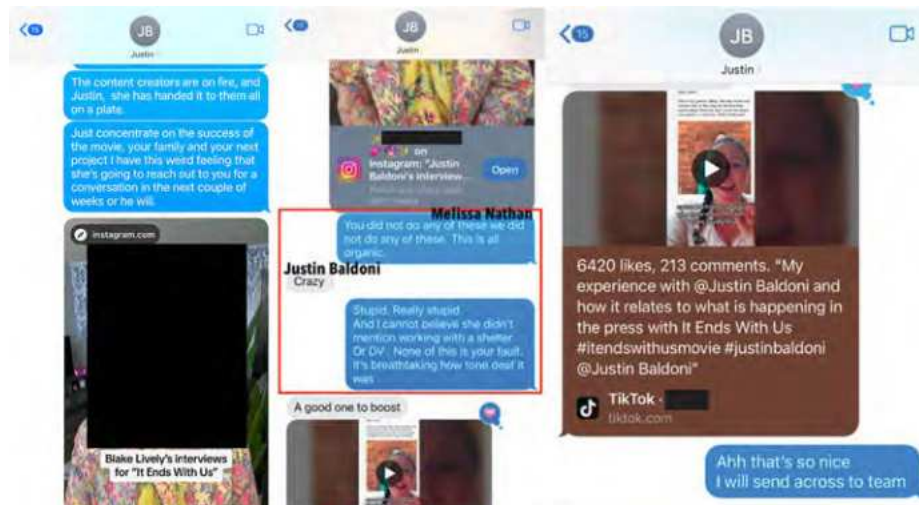




**August 18, 2024:** Baldoni again asks Nathan to confirm, “This is not us correct?” Baldoni was seeing the “feud rumors” and could not believe how much heat Lively was getting. Nathan reassures him that “[n]one of us would ever do this.” Nathan continues, “[T]here is the struggle where it’s kind of maybe even unbelievable the way that people are turning against her . . . [it was] organic she’s blown herself up by her own actions.”





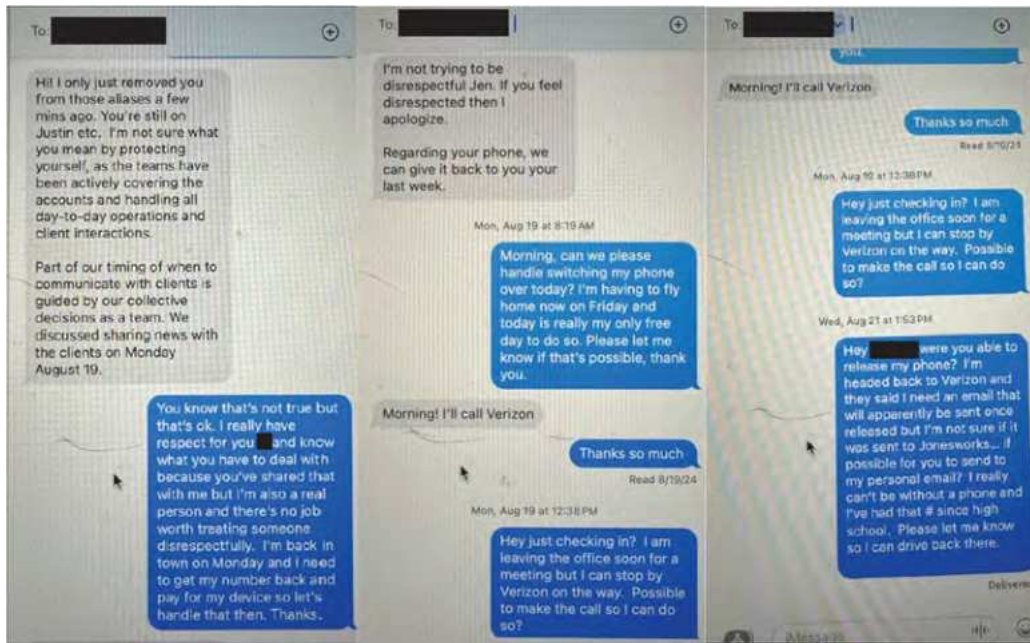


**August 19, 2024:** Angela Yang, Blake Lively's 'It Ends With Us' promotion called 'disrespectful' by some survivors of abuse (Aug. 19, 2024), <https://www.nbcnews.com/pop-culture/blake-lively-it-ends-with-us-promotion-criticism-rcna167175>.

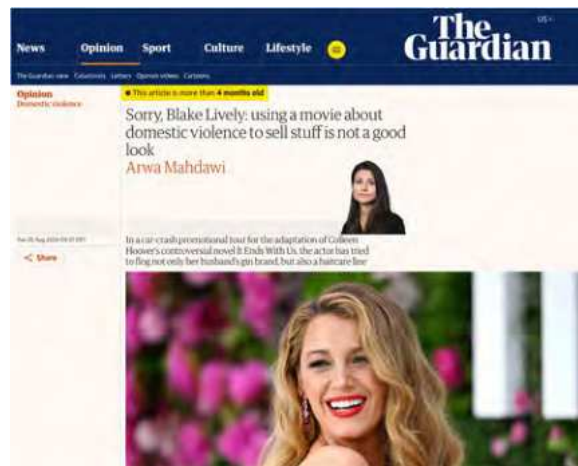


**August 19, 2024:** Jonesworks chief of staff promises to release Abel's phone number to her.





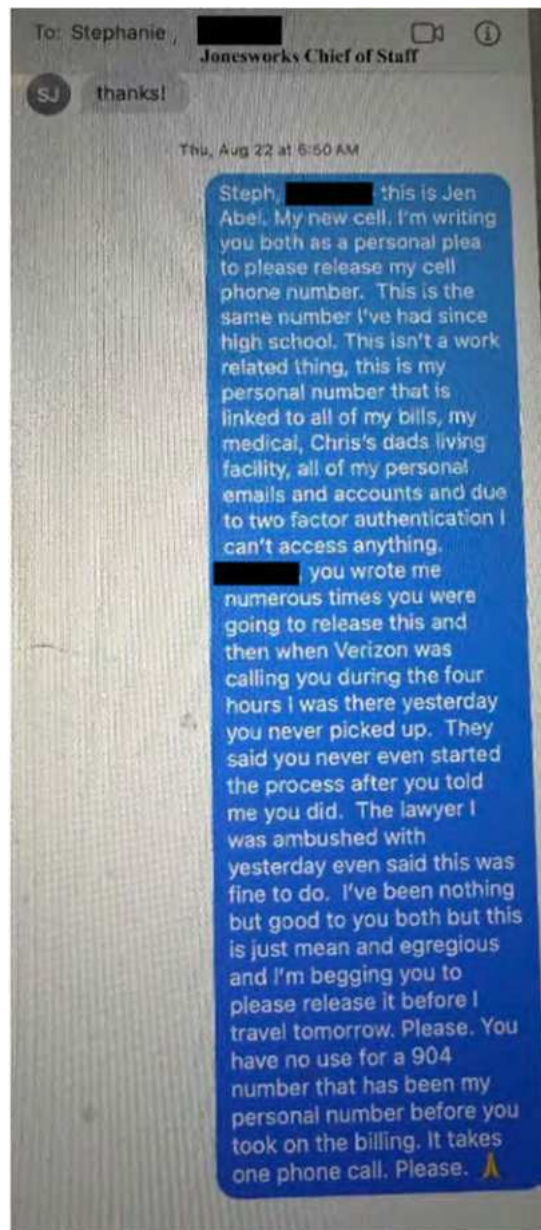
**August 20, 2024:** More organic negative press. Arwa Mahdawi, Sorry, Blake Lively: using a movie about domestic violence to sell stuff is not a good look (Aug. 20, 2024), <https://www.theguardian.com/commentisfree/article/2024/aug/20/blake-lively-it-ends-with-us-colleen-hoover>.



**August 21, 2024:** On August 21, 2024, two days before her last day, Abel pulls up to the Jonesworks office in Beverly Hills. There, she is 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 sees that the security guard is posted just outside its doors, blocking the exit. In a menacing and cold tone, the attorney points to the documents and tells Abel to review and sign them. The attorney claims that Jonesworks believes she had proprietary information on her personal laptop and will likely have grounds to sue if Abel does not allow them access.

Completely caught off guard by this hostile and intimidating display, Abel falls into a state of shock. She has never experienced anything like this and does not know what to do. Fearful that she will burst into tears and humiliate herself (which she knew was what Jones wants), Abel dissociates. Knowing she has not done anything wrong and desperate to get out of there, Abel signs the documents without digesting their contents. Afterward, the lawyer demands that Abel hand over her personal laptop. Abel complies, and the IT professional conducts a search that turns up nothing. The attorney then presents Abel with a list of approximately 10 documents and accuses her of having accessed and stolen them. Abel denies having done so, and the IT specialist conducts a further search of her laptop, which again turns up nothing.

The attorney then instructs Abel to hand over her phone, after which security would escort her out of the building. Still utterly shell-shocked and desperate to get out of there, Abel agrees to hand over her phone, so long as they will confirm that Jonesworks will immediately release her personal cell phone number, allowing Jonesworks to take possession of the physical device without gaining unrestrained access to its contents. It will also enable Abel to get a new phone and move on with her life without undue disruption. Abel pleads with Jones to release her number in a text the following day.



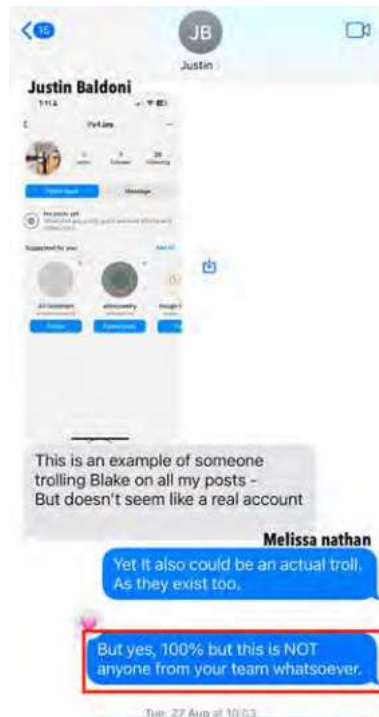
**August 21, 2024:** On the same day that Abel's phone is seized by her employer, Stephanie Jones, Nathan receives a call from Leslie Sloane (Lively's publicist) telling her that she has "seen her texts" and that she will be sued.

## Melissa Nathan Call Log (Aug 21, 2024)

📞	[REDACTED]	Aug 21, 2024	6:07 pm	1 mins	Beverlyhls, CA	Network	\$0.00
📞	[REDACTED]	Aug 21, 2024	6:04 pm	3 mins	Incoming	Network	\$0.00
📞	[REDACTED]	Aug 21, 2024	6:02 pm	3 mins	Incoming	Network	\$0.00
📞	[REDACTED]	Aug 21, 2024	5:55 pm	5 mins	Bronx Nyc, NY	Network	\$0.00
📞	Leslie Sloan	Aug 21, 2024	5:52 pm	3 mins	Incoming	Network	\$0.00
📞	[REDACTED]	Aug 21, 2024	5:17 pm	11 mins	Wlosangeles, CA	Network	\$0.00
📞	[REDACTED]	Aug 20, 2024	7:24 pm	3 mins	Incoming	Network	\$0.00
📞	[REDACTED]	Aug 20, 2024	6:01 pm	5 mins	Incoming	Network	\$0.00
📞	[REDACTED]	Aug 20, 2024	5:41 pm	5 mins	Jacksonvl, FL	Network	\$0.00

**August 23, 2024:** Baldoni sends Nathan a suspicious profile, suspecting it of trolling Lively. Nathan confirms that “100%...this is NOT anyone from your team whatsoever.”

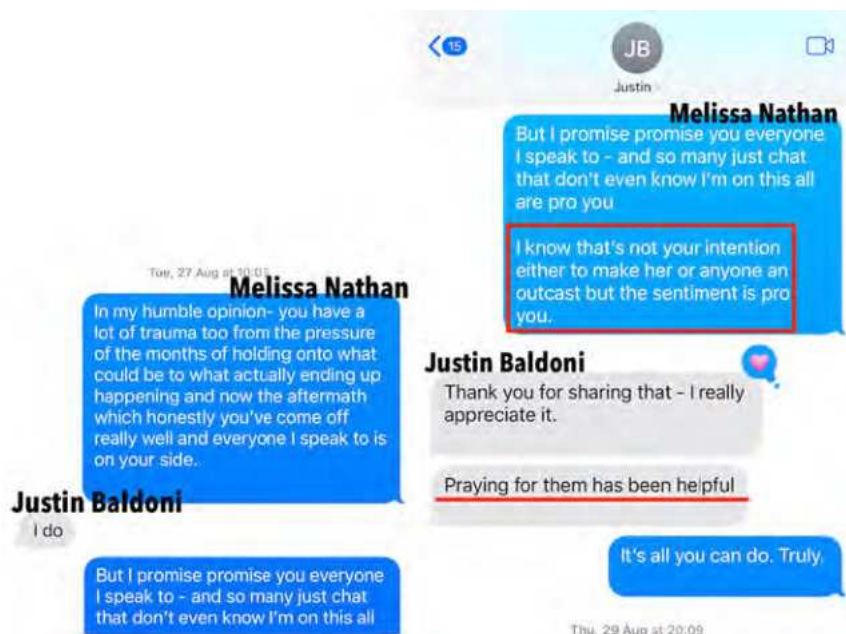




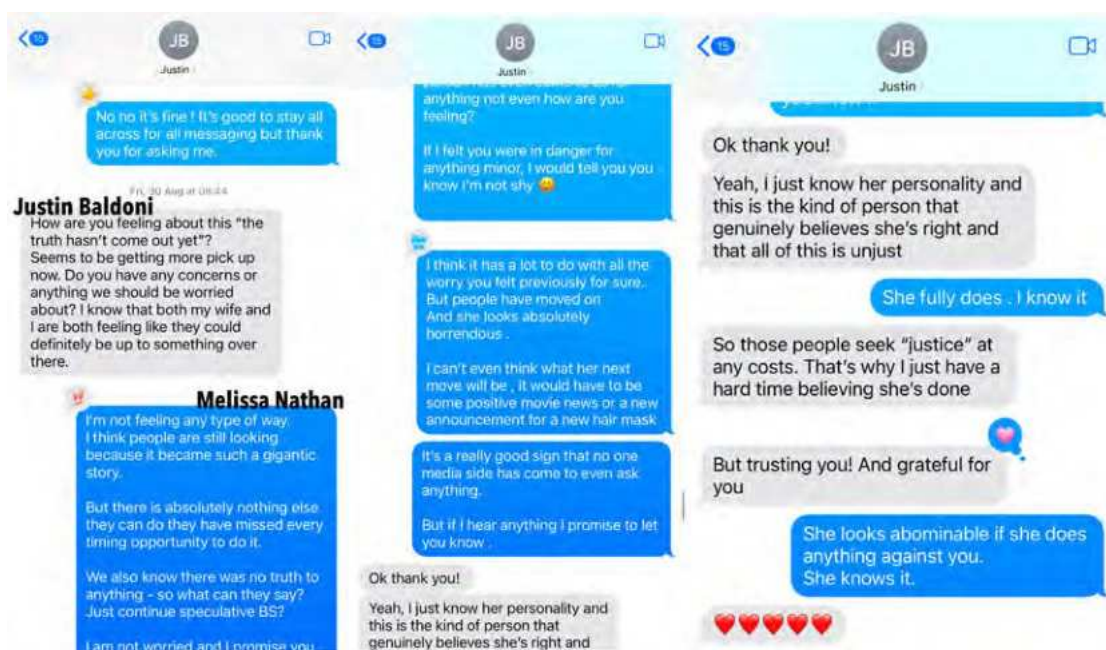
**August 24, 2024:** Nathan's TAG team continues to see organic backlash towards Lively, without the involvement of TAG. The article in question: “*Blake Lively FEARING for her career amid IT ENDS WITH US Backlash*”



**August 27, 2024:** Nathan further reassures Baldoni that “Everyone I speak to – and so many just chat[s] that don’t even know I’m on this all, are pro you. I know that’s not your intention either to make her or anyone an outcast but the sentiment is pro you.” Baldoni responds, “Thank you for sharing” and “praying for [Lively and Reynolds] has been helpful”.

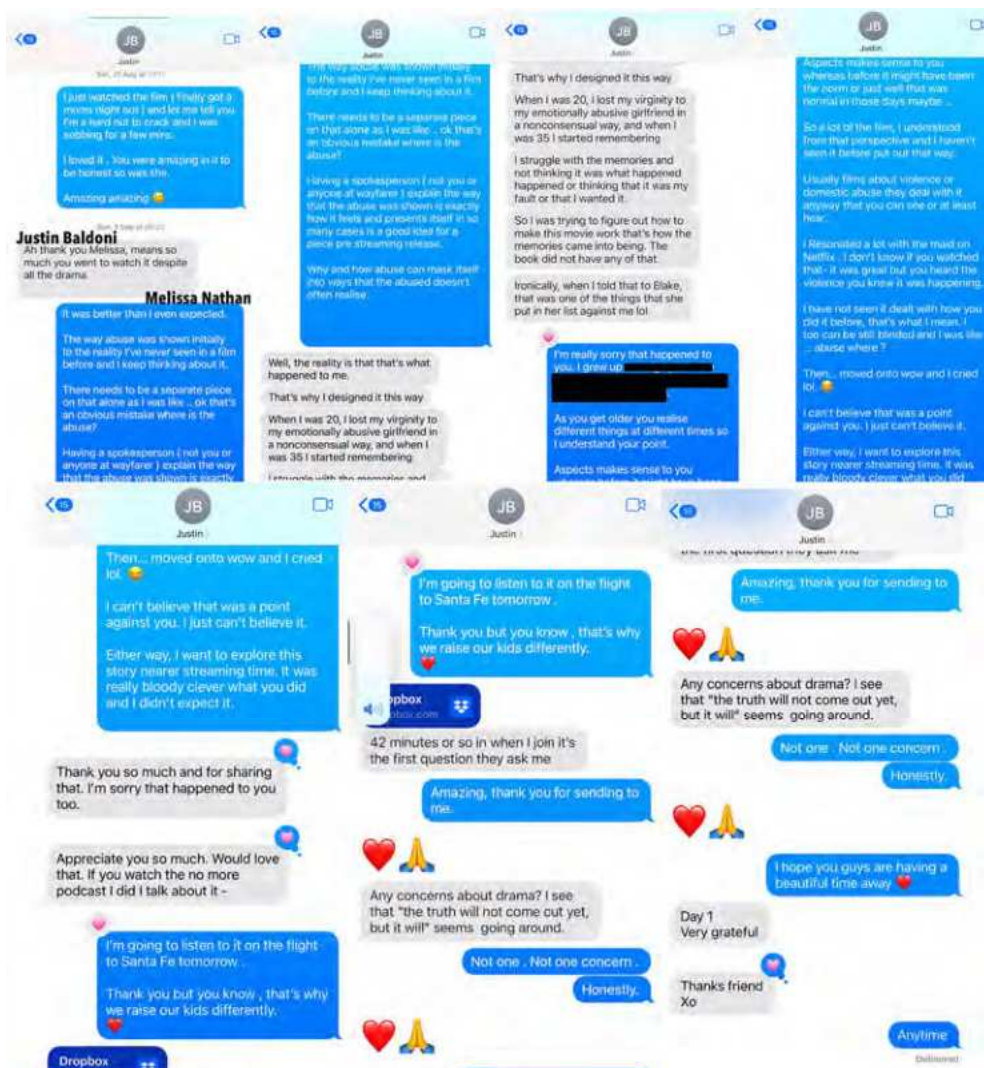


**August 30, 2024:** The internet continues to churn out new stories. Baldoni asks Nathan how she feels and if she shares any concerns. Nathan reassures him that “there was no truth to anything- so what can they say? Just speculative BS? I am not worried and I promise you.”



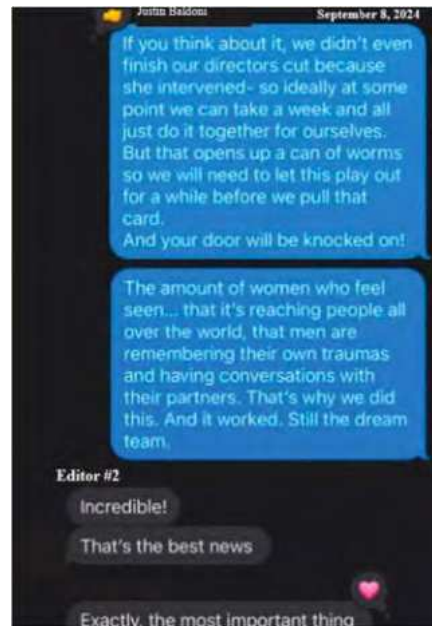
**September 1, 2024:** Nathan reveals to Baldoni that she finally watched the Film in theaters. She shares a touching message with Baldoni. He also shares a personal story that inspired him to direct the movie and ultimately option the book. Ironically it was this story that Lively chose to use against him later in her list of 17 points when she required that “There be no discussions with [Ms. Lively] of personal experiences with sex”. In her Complaint, she intentionally

misrepresents the story to suggest that Baldoni had engaged in sexual conduct without consent. In fact, it was the other way around. Baldoni was referencing an intimate relationship in which he was the one who did not give consent, not the other way around.



**September 8, 2024:** Baldoni sends a text to his original editors, hopeful that one day they will complete the Film as intended.





**December 20, 2024:** Lively files her Complaint with the California Civil Rights Department.

**December 20, 2024:** Meghan Twohey a reporter for the New York Times, reaches out to Wayfarer about allegations made by Lively related to a filed CRD complaint. "Please offer any on-the-record comment, as well as any other information you think we should know. Additionally, please notify us of any inaccuracies. We need to hear back from you tomorrow by noon Eastern.

From: Megan Twohey <[REDACTED]>  
Date: Friday, December 20, 2024 at 6:46 PM  
To: jennifer[REDACTED]@gmail.com [REDACTED] Jennifer Abel [REDACTED]  
Subject: URGENT questions from New York Times

Ms. Abel:

We are reporting about a crisis communication operation, conducted on behalf of Justin Baldoni, Jamey Heath and Wayfarer Studios, to protect their reputations and harm Blake Lively's, as described in a legal complaint filed today.

Our reporting found that you participated in the effort, which was undertaken last summer out of concern that complaints Ms. Lively had made during the filming of "It Ends With Us" would become public during the movie's rollout.

We have learned that Ms. Lively filed the legal complaint against you, Mr. Baldoni, Mr. Heath, Steve Sarowitz, Wayfarer, Melissa Nathan and Jed Wallace, alleging sexual harassment, retaliation, and aiding and abetting of harassment and retaliation, among other claims. The complaint claims misconduct on the part of Mr. Baldoni and Mr. Heath during filming, including repeatedly violating physical boundaries and making sexual and other inappropriate comments.

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The complaint includes a side letter to her contract, signed by Mr. Heath, in which the studio agreed to install more safeguards during filming and agreed not to retaliate against Ms. Lively. She is now saying they violated the terms of the letter.

The complaint includes extensive private text messages and emails that she obtained through a subpoena and that document the crisis communication operation. They include exchanges involving you, your team, Mr. Baldoni and Mr. Heath. The New York Times reviewed these along with other documents.

We are seeking your response to the claims of retaliation through this P.R. campaign, and we would welcome the opportunity to talk with you on the record. Please offer any on-the-record comment, as well as any other information you think we should know. Additionally, please notify us of any inaccuracies. We need to hear back from you tomorrow by noon Eastern.

Among Ms. Lively's allegations:

–In May, several months after the filming wrapped, Mr. Baldoni was worried when he realized that Ryan Reynolds had blocked him on Instagram. "We should have a plan for IF she does the same when movie comes out," Mr. Baldoni wrote you in a text message. "Plans make me feel more at ease."

–You were already working as a publicist for Mr. Baldoni and Wayfarer.

–Mr. Baldoni and Mr. Heath hired Melissa Nathan, a crisis communications specialist, who in turn brought in Mr. Wallace. The plan was to harm Ms. Lively's reputation.

–Ms. Nathan shared a planning document in early August, describing options to pursue if Ms. Lively or her team went public with complaints about Mr. Baldoni’s and Mr. Heath’s behavior. She suggested talking points to use with reporters, including that Ms. Lively used an imbalance of power to take creative control of the film.

–Mr. Baldoni wanted more. You wrote to Ms. Nathan: “I think you guys need to be tough and show the strength of what you guys can do in these scenarios. He wants to feel like she can be buried.”

Ms. Nathan responded: “Of course- but you know when we send over documents we can’t send over the work we will or could do because that could get us in a lot of trouble.”

“We can’t write it down to him. We can’t write we will destroy her.”

“Imagine if a document saying all the things that he wants ends up in the wrong hands.”

“You know we can bury anyone,” she added. “But I can’t write that to him.”

–Three days later, Mr. Baldoni texted you, flagging a social media thread that accused another celebrity of bullying behavior and that had generated 19 million views. Mr.

---

Baldoni wrote, “This is what we would need.”

–Ms. Nathan presented proposals to hire contractors to dominate social media through “full social account take downs,” by starting “threads of theories” and generally working to “change narrative.”

–You wrote to Ms. Nathan, “I think we need to put the social combat plan into motion,” and she responded, “So do I.”

–The team worked to block stories about Mr. Baldoni’s behavior that had concerned Ms. Lively and reinforce negative ones about the actress.

–The press coverage probing Mr. Baldoni’s separation from Ms. Lively and the rest of the cast was largely vague and didn’t include the most serious allegations against Mr. Baldoni.

–Ms. Nathan texted you: “He doesn’t realise how lucky he is right now we need to press on him just how fucking lucky.”

“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.”

–Ms. Nathan indicated that she succeeded in keeping allegations against you out of stories, and wrote in one text that major news outlets were “standing down on HR complaint.”

–You wrote to Ms. Nathan “So are we in the clear now?! Did we survive,” and she responded “ We survived ALL Press is so overwhelming Weve confused people So much mixed messaging It’s actually really funny if you think about it.”

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–Under the official promotion plan, Ms. Lively focused on the uplifting nature of the film rather than abuse. When the PR team saw that critics accused her of being tone deaf, the group decided that Mr. Baldoni would highlight survivors of domestic violence.

– There are references in emails to “social manipulation” and “proactive fan posting,” and text messages cite efforts to “boost” and “amplify” online content that was favorable to Mr. Baldoni or critical of Ms. Lively.

–Ms. Nathan sent you a comment from Mr. Wallace that “we are crushing it on Reddit.”

–The next day, one of her employees texted, “We’ve also started to see a shift on social, due largely to Jed and his team’s efforts to shift the narrative.”

–Ms. Nathan wrote to you: “And socials are really really ramping up. In his favour, she must be furious. It’s actually sad because it just shows you have people really want to hate on women.”

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–When a TikTok sleuth started asking questions about Mr. Baldoni, you texted that “We’ve flagged to Jed and his team for more serious action on the social side.”

–You wrote to Ms. Nathan:

“ The narrative online is so freaking good and fans are still sticking up for Justin and there literally has been no pickup of those two articles which is actually shocking to me. But I see this as a total success, as does Justin.

You did such amazing work”

Ms. Nathan responded:

“Narrative is CRAZY good So did you.

The majority of socials are so pro Justin and I don’t even agree with half of them lol”

–Mr. Baldoni periodically looked for assurances that the crisis team was not deploying bots. Ms. Nathan wrote that they were not using bots and that Mr. Wallace’s operation “is doing something very specific in terms of what they do. I know Jamey & Jed connected on this.”

–On Aug. 16, when Ms. Nathan shared a Daily Mail article headlined “Is Blake Lively set to be CANCELLED?” you responded “Wow. You really outdid yourself with this piece.” And Ms. Nathan wrote: “That’s why you hired me right? I’m the best.”

–The manipulated media coverage and online commentary became an unusually high percentage of Ms. Lively’s online presence. She was branded tone-deaf, difficult to work with, a bully. Sales of her new hair-care line plummeted.

Sincerely,  
Megan

Megan Twohey

Reporter

New York Times





**December 20, 2024:** At 2:16 a.m. (EST), Wayfarer’s representative responds to the journalist and unequivocally denied Lively’s accusations.

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.

**December 21, 2024:** at 10:11 a.m. (EST) on December 21, 2024, almost two hours before the deadline given by Twohey for Plaintiffs’ response, the Times published the article entitled “We Can Bury Anyone’: Inside a Hollywood Smear Machine” (the “Article”).

**December 31, 2024:** Baldoni and team file lawsuit against the *New York Times*.

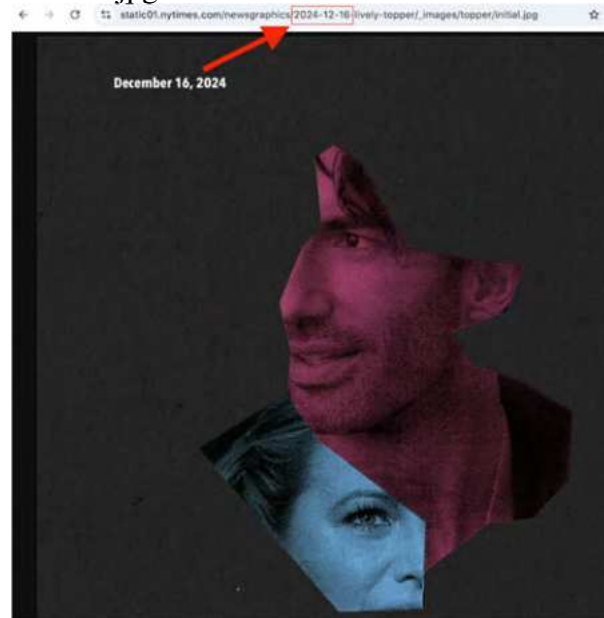
**December 31, 2024:** Lively files lawsuit against Baldoni and team.

**January 7, 2025:** Lively attempts to serve Baldoni and team during the Los Angeles wildfires, going as far as to serve a member of Baldoni’s team while they attempted to evacuate with their small child.

**January 16, 2025:** Baldoni and team file suit against Lively, Reynolds, Sloane and Vision PR.

**January 24, 2025:** Discovery is made that the main imagery used in the Article has meta data creation timestamps days prior to publication.

- The main Baldoni image that headlines the article was finalized on **December 16, 2024**  
[https://static01.nytimes.com/newsgraphics/2024-12-16-lively-topper/\\_images/topper/initial.jpg](https://static01.nytimes.com/newsgraphics/2024-12-16-lively-topper/_images/topper/initial.jpg)



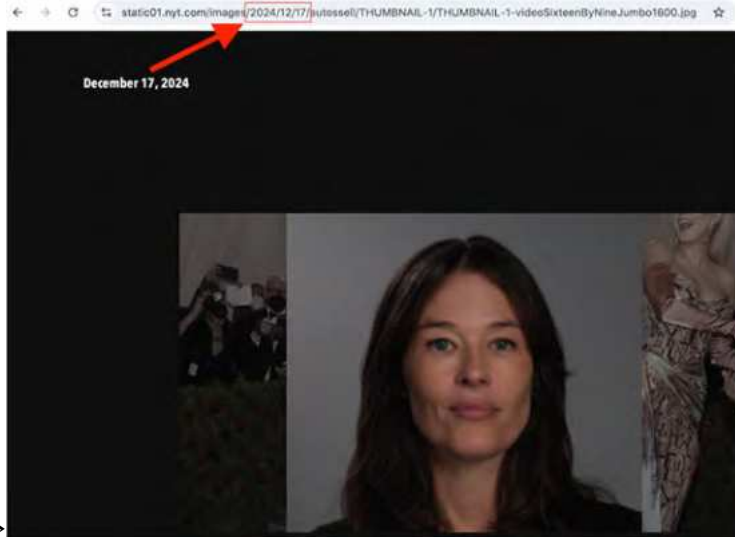
- Additional smear Baldoni imagery existing within the article on **December 18, 2024**  
<https://static01.nyt.com/images/2024/12/18/multimedia/00smear-baldoni-tqmz/00smear-baldoni-tqmz-superJumbo.jpg>



**January 26, 2025:** It is determined that the promotional video for the Lively smear campaign article was finalized on December 12, 2024.

- The video preload's static imagery for promotion inside the article itself was created on **December 17, 2024** <video preload="auto" x-webkit-airplay="allow" id="video\_1738109173616" playsinline="playsinline" webkit-playsinline="webkit-playsinline">

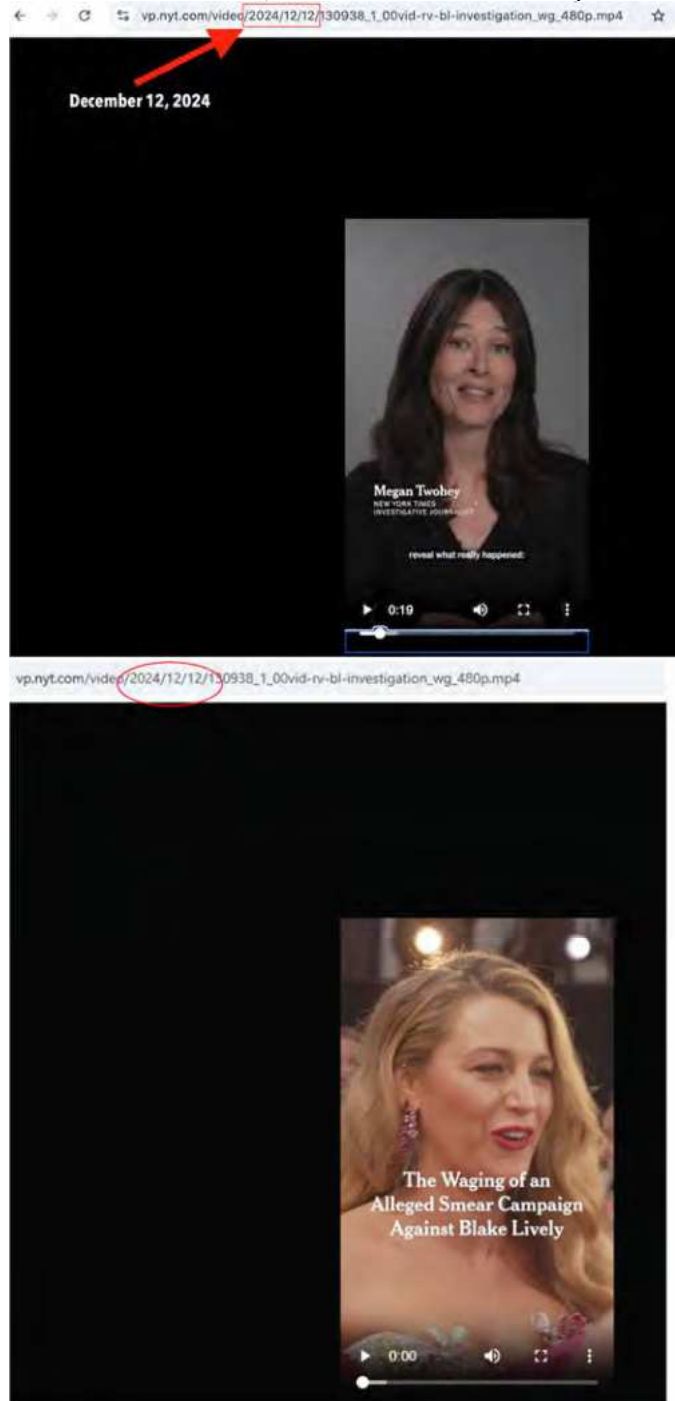
poster="https://static01.nyt.com/images/2024/12/17/autosell/THUMBNAI-1/THUMBNAI-1-videoSixteenByNineJumbo1600.jpg" style="height: 100%; width: 100%; position: absolute; top: 0px; left: 0px;" src="blob:https://www.nytimes.com/88bf31e2-3886-49ba-9741-



- 85d01eb50424"></video>
- The schema for the video page also confirms a **December 12, 2024** finalization and upload date  

```
{ "@context": "https://schema.org", "@type": "VideoObject", "@id": "https://www.nytimes.com/video/arts/100000009874263/the-waging-of-an-alleged-smear-campaign-against-blake-lively.html", "description": "The movie 'It Ends With Us' starring Blake Lively was a huge box office hit, even as rumors spread of turmoil behind the scenes. Private messages detail a campaign to tarnish Lively after she accused Justin Baldoni of misconduct on set. Megan Twohey, an investigative reporter at The New York Times, explains.", "url": "https://www.nytimes.com/video/arts/100000009874263/the-waging-of-an-alleged-smear-campaign-against-blake-lively.html", "inLanguage": "en", "name": "The Waging of an Alleged Smear Campaign Against Blake Lively", "thumbnailUrl": ["https://static01.nyt.com/images/2024/12/17/autosell/THUMBNAI-1/THUMBNAI-1-videoSixteenByNineJumbo1600.jpg", "https://static01.nyt.com/images/2024/12/17/autosell/THUMBNAI-1/THUMBNAI-1-superJumbo.jpg", "https://static01.nyt.com/images/2024/12/17/autosell/THUMBNAI-1/THUMBNAI-1-mediumSquareAt3X.jpg"], "publisher": { "@context": "https://schema.org", "@type": "Organization", "name": "The New York Times", "logo": { "@context": "https://schema.org", "@type": "ImageObject", "url": "https://static01.nyt.com/images/icons/t_logo_291_black.png", "height": 291, "width": 291, "contentUrl": "https://static01.nyt.com/images/icons/t_logo_291_black.png", "creditText": "The New York Times" }, "url": "https://www.nytimes.com/" }, "isPartOf": { "@type": "CreativeWork", "Product": "The New York Times", "productId": "nytimes.com:basic" }, "embedUrl": "https://www.nytimes.com/video/players/offsite/index.html?videoId=100000009874263", "contentUrl": "https://vp.nyt.com/video/2024/12/12/130938_1_00vid-rv-bl-
```

investigation\_wg\_480p.mp4", "uploadDate": "2024-12-21T18:26:09.603Z", "duration": "PT4M29S"}



**January 27, 2025:** The Wayfarer Parties found 41 instances of a **October 31, 2024** timestamp related to text message storage and styling into Birdkit, which are believed to be the content management system (CMS) for the Times.

- <link rel="modulepreload"  
href="https://static01.nytimes.com/newsgraphics/2024-10-31-message-embed-



generator/9bb06232-7897-46f7-8a79-9f19037ab08a/\_assets/\_app/immutable/chunks/scheduler.CPBLf4dL.js">

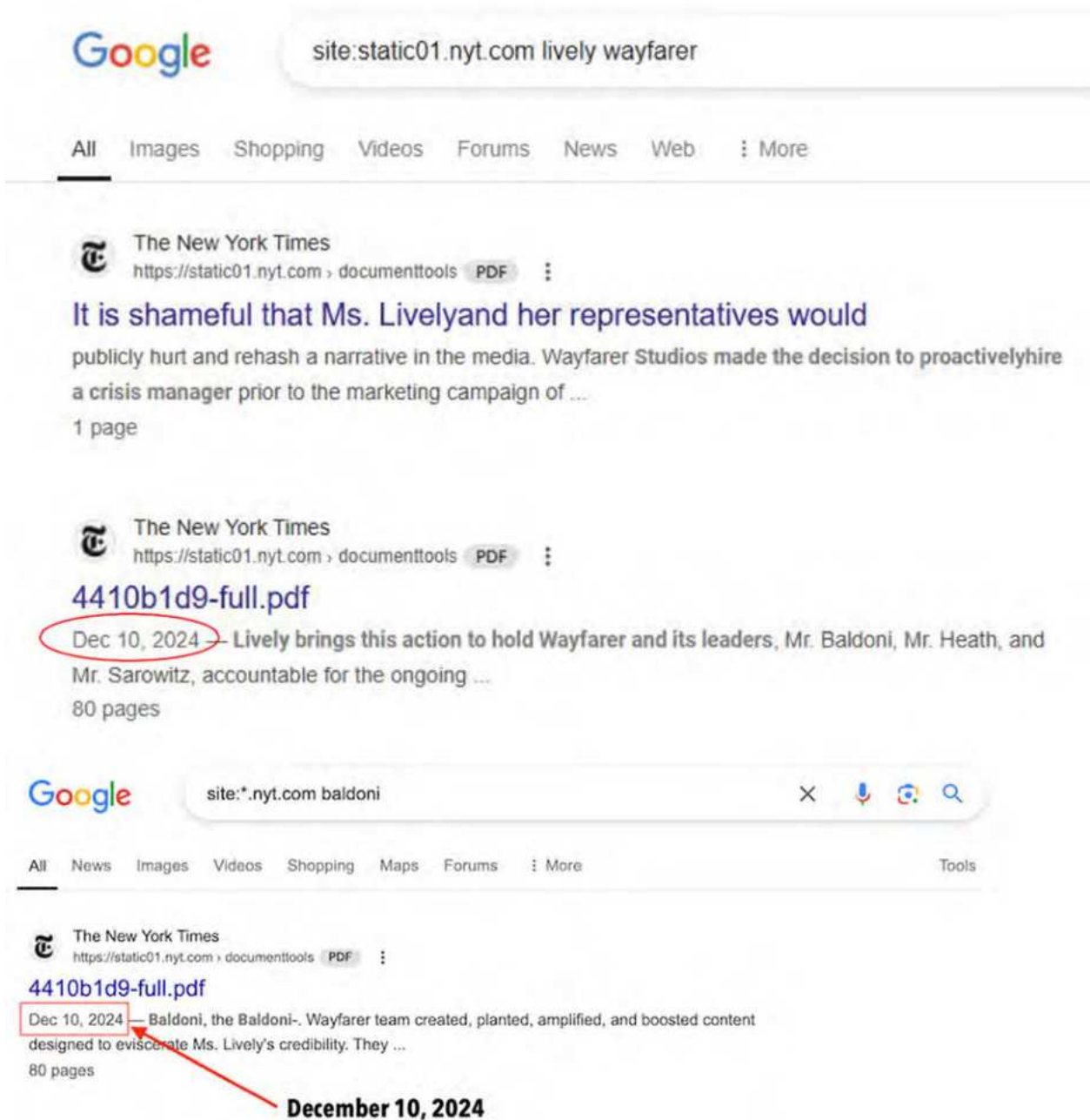
On information and belief, the 2024-10-31 does not correspond to the message embed generator versioning itself, but rather when they may have been embedded into the CMS for future use in an article. Previous articles show a similar pattern:

- <https://www.nytimes.com/interactive/2024/10/17/opinion/dobbs-roe-abortion-stories.html> was published on October 17, 2024 with Birdkit timestamp for the text messages of August 9, 2024.
- <https://www.nytimes.com/2023/05/03/books-review/tucker-carlson-text-message-whiteness.html> was published on May 3, 2023 with Birdkit timestamp for the text messages of April 14, 2023.



**January 28, 2024:** It is confirmed that the PDF version of the CRD filed by Lively was indexed on New York Times' domain on **December 10, 2024**. This does not necessarily represent the first time that the file was indexed by Google, just that it was indexed on this date. In order to accurately determine the first indexation, data would be required from the New York Times Google search console account.

- "Site:\*.nyt.com Baldoni" is the query performed to find the PDF in Google, which shows all subdomain and main website results that reference 'Baldoni';
- [https://www.google.com/search?q=site%3A\\*.nyt.com+baldoni](https://www.google.com/search?q=site%3A*.nyt.com+baldoni)



**January 29, 2025:** After performing a deeper analysis, the following was found:

- The JSON schema exposes the smear promo imagery was set for consumption at the end webpage level on **December 18, 2024**. In the highlighted images there is a reference to smear-promo-Google which means that object's imagery was intended to be consumed most likely as either Google News direct feed OR as a Google Adwords ad unit. There are also multiple versions of these images. The v2 and v3 suggests they went through multiple iterations before arriving at what could be used on **December 18th**.
  - {"@context":"https://schema.org","@type":"NewsArticle","@id":"https://www.nytimes.com/2024/12/21/business/media/blake-lively-justin-baldoni-it-ends-with-

us.html", "description": "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."

", "image": [{ "@context": "https://schema.org", "@type": "ImageObject", "url": "https://static01.nyt.com/images/2024/12/18/multimedia/00smear-promo/00smear-promo-videoSixteenByNineJumbo1600-v2.jpg", "height": 900, "width": 1600, "contentUrl": "https://static01.nyt.com/images/2024/12/18/multimedia/00smear-promo/00smear-promo-videoSixteenByNineJumbo1600-v2.jpg", "creditText": "Illustration by Najeebah Al-Ghadban"}, {" "@context": "https://schema.org", "@type": "ImageObject", "url": "https://static01.nyt.com/images/2024/12/18/multimedia/00smear-promo/00smear-promo-googleFourByThree-v2.jpg", "height": 600, "width": 800, "contentUrl": "https://static01.nyt.com/images/2024/12/18/multimedia/00smear-promo/00smear-promo-googleFourByThree-v2.jpg", "creditText": "Illustration by Najeebah Al-Ghadban"}, {" "@context": "https://schema.org", "@type": "ImageObject", "url": "https://static01.nyt.com/images/2024/12/18/multimedia/00smear-promo/00smear-promo-mediumSquareAt3X-v3.jpg", "height": 1802, "width": 1800, "contentUrl": "https://static01.nyt.com/images/2024/12/18/multimedia/00smear-promo/00smear-promo-mediumSquareAt3X-v3.jpg", "creditText": "Illustration by Najeebah Al-Ghadban"}]

- Preloaded JavaScript for the Lively header image <link rel="modulepreload" as="script" crossorigin="" href="https://static01.nytimes.com/newsgraphics/2024-12-16-lively-topper/addc97ba-86a6-42a5-b1ea-31572ce283f7/\_assets/\_app/immutable/nodes/1.DYJTgov0.js">
- The interactive topper for the appears to have been finalized on **December 16, 2024**
  - <link rel="modulepreload" href="https://static01.nytimes.com/newsgraphics/2024-12-16-lively-topper/addc97ba-86a6-42a5-b1ea-31572ce283f7/\_assets/\_app/immutable/entry/start.D5WakA7s.js"><link rel="modulepreload" href="https://static01.nytimes.com/newsgraphics/2024-12-16-lively-topper/addc97ba-86a6-42a5-b1ea-31572ce283f7/\_assets/\_app/immutable/chunks/entry.Dl6yHT4n.js">
  - <link rel="modulepreload" href="https://static01.nytimes.com/newsgraphics/2024-12-16-lively-topper/addc97ba-86a6-42a5-b1ea-31572ce283f7/\_assets/\_app/immutable/chunks/scheduler.DbTKtulb.js"><div id="g-2024-12-16-lively-topper" class="birdkit-bodyg-2024-12-16-lively-topperg-dark-mode-compatible" data-preview-slug="2024-12-16-lively-topper" data-birdkit-hydrate="fd78541ba0cd3a2a">
- Multimedia sources timestamped **December 18, 2024**
  - <source media="(max-width: 599px) and (min-device-pixel-ratio: 3),(max-width: 599px) and (min-resolution: 3dppx),(max-width: 599px) and (min-resolution: 288dpi)" srcset="https://static01.nyt.com/images/2024/12/18/multimedia/00smear-baldoni-tqmz/00smear-baldoni-tqmz-

- [mobileMasterAt3x.jpg?quality=75&auto=webp&disable=upscale&width=1800](https://static01.nyt.com/images/2024/12/18/multimedia/00smear-baldoni-tqmz/00smear-baldoni-tqmz-mobileMasterAt3x.jpg?quality=75&auto=webp&disable=upscale&width=1800)">

o <source media="(max-width: 599px) and (min-device-pixel-ratio: 2),(max-width: 599px) and (min-resolution: 2dppx),(max-width: 599px) and (min-resolution: 192dpi)" srcset="<https://static01.nyt.com/images/2024/12/18/multimedia/00smear-baldoni-tqmz/00smear-baldoni-tqmz-mobileMasterAt3x.jpg?quality=75&auto=webp&disable=upscale&width=1200>">
- o <source media="(max-width: 599px) and (min-device-pixel-ratio: 1),(max-width: 599px) and (min-resolution: 1dppx),(max-width: 599px) and (min-resolution: 96dpi)" srcset="<https://static01.nyt.com/images/2024/12/18/multimedia/00smear-baldoni-tqmz/00smear-baldoni-tqmz-mobileMasterAt3x.jpg?quality=75&auto=webp&disable=upscale&width=600>">