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Details of Filing

Document Lodged: Affidavit - Form 59 - Rule 29.02(1)
Court of Filing: FEDERAL COURT OF AUSTRALIA (FCA)
Date of Lodgment: 25/02/2026 11:49:01 AM AEDT
Date Accepted for Filing: 25/02/2026 11:49:08 AM AEDT
File Number: NSD1727/2025
File Title: CHARLOTTE MACINNES v REBEL WILSON
Registry: NEW SOUTH WALES REGISTRY - FEDERAL COURT OF AUSTRALIA



Sia Lagos

Registrar

Important Information

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Form 59
Rule 29.02(1)

Affidavit of Gregor Alan Cameron

NSD 1727 of 2025

Federal Court of Australia
District Registry: New South Wales
Division: General

Charlotte MacInnes

Applicant

Rebel Wilson

Respondent

Affidavit of: **Gregor Alan Cameron**

Address: [REDACTED]

Occupation: Producer

Date: 24 February 2026

I, Gregor Alan Cameron, say on oath:

Introduction

1. I am a producer of the film "*The Deb*" (**The Deb**).
2. Exhibited to this affidavit is a paginated bundle of documents marked '**Exhibit GC-1**'.
3. In preparing this affidavit, I have read affidavits affirmed by the Respondent (**Rebel**) and her wife Ramona Agruma (**Ramona**) served in these proceedings. In this affidavit, I respond to some of the allegations raised by Rebel and Ramona in their affidavits.

Background

4. I hold a Bachelor of Science (Social Psychology) from the London School of Economics obtained in 1991.

| | | |
|---|---|-----|
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[Form approved 01/08/2011]

5. I have been a television, film, documentary and live event producer since 1998, having worked in the industry since 1991.
6. My most recent films include "Tetris" in 2023, "Mad About the Boy: The Noel Coward Story" in 2023, and The Deb in 2024.
7. The term "producer" can mean a number of things in the film industry. In my role, I am what is called a "creative producer". My focus will typically be on the overall film from script to screen - the script (particularly the quality and length), casting, budget, filming, and the production schedule through post production.
8. Depending on the circumstances, I may also be involved in the day-to-day production of the film on set.

The relevant parties

AI Film

9. A.I. Film Production Limited (**AI Film**) is a film finance and production company based in the United Kingdom (**UK**). AI Film provides financing and distribution services to films and other productions.
10. Vincent Holden (**Vince**) and I are the two directors of AI Film.

Unigram

11. I am also a director of Unigram Media Limited (**Unigram**), alongside my wife Amanda Ghost (**Amanda**). Amanda and I have been married for 18 years and have two teenage children.
12. Unigram is a film, theatre and music production company based in the UK. Amanda and I own 30% of the shares in Unigram, with the balance ultimately owned by Access Industries.
13. When working on a film, I do not have a personal contract where I provide my services as a producer. Instead, the contracts are with Unigram, and the company "loans out" my services to the production of the film.
14. Amanda also provides services through Unigram in this way. However, for some of her work (for example, music services) she will provide it to the film directly.

Camp Sugar

15. Camp Sugar Production Pty Ltd (**Camp Sugar**) is Rebel's company. Rebel and her mother, Sue Bownds, are the directors of Camp Sugar.

DD and DDCC

16. Dunburn Debutantes Commissioning Company Pty Ltd (**DDCC**) is an Australian company equally owned by AI Film and Camp Sugar. The Board of DDCC comprises two nominee




directors of AI Film (being Vince and myself) and two nominee directors of Camp Sugar (being Rebel and Ms Bownds). DDCC was constituted as the company which would own all rights in and to The Deb.

17. Dunburn Debutants Pty Ltd (**DD**) is also an Australian company. I am one of the directors of DD. DD is a wholly owned subsidiary of DDCC that was constituted as a special purpose vehicle to be the production company for the film.

Bunya

18. Bunya Productions (**Bunya**) is an Australian film and television production company run by co-managing directors David Jowsey (**David**) and Greer Simpkin (**Greer**).
19. Bunya was also engaged in the production of The Deb. Greer was another producer for the film, alongside Amanda, Vince, and myself.

Producing a film

20. No two independent films are made or produced in the same way. However, in my experience, producing a film will at least involve the following steps:
- (a) initial discussions around an idea, project or script;
 - (b) discussing finance arrangements, arranging for key cast and crew, establishing key terms, and discussing the "shape" of the production (how the script, schedule and budget will be configured);
 - (c) pre-production work (by which I mean preparatory work before shooting commences) — at this time many factors are still subject to change (including the finance, script, budget, filming schedule, final cast, and locations for shooting);
 - (d) often at the same time as pre-production, formalising the film's budget, filming and production schedule, final cast, and other legal agreements;
 - (e) shooting the film (a process which involves dealing with daily production issues and revising many of the above elements);
 - (f) post-production work (by which I mean bringing all of the footage, music and other components together into the finished product);
 - (g) building interest and momentum for the film, including by premiering the film at film festivals and similar events; and
 - (h) arranging for distribution and sale of the film.
21. As I have set out above, one of my typical roles on a film is in helping to supervise and prepare the budget.




22. Preparing a budget takes time and is not finalised until the film closes its financing (by "closes" I mean when final signatures are obtained on the underlying legal documents). Many items impact the budget and necessitate revisions and increases, including:
- (a) changes to the scope of the film (for example, increased length or additional cast);
 - (b) unexpected costs (for example, arising out of delays); and
 - (c) legitimate tax structuring and taking advantage of government subsidies and rebates.
23. Most film budgets, in my experience, take the form of a "work in progress model" until finalised at the formal closing of the film. By "work in progress model", I mean that each iteration of the budget is a working draft until it is finalised in formal legal documentation which is supplied to all parties to review and approve (including all producers, banks and lenders, and the bond company). A bond company provides a form of insurance (or bond) for the filming schedule, script and budget of a film.
24. Changes are often made in real time as actual costs are incurred or new issues raised.
25. As final legal agreements are dependent on the budget, formalising those agreements takes time and in certain cases will not be finished until after shooting has already commenced. Even after the legal documentation is signed, there will sometimes be "overages" during the course of production (by "overages" I mean unexpected additional costs). The expenditure for a film by the time shooting has finished may be higher than that in the formal legal documentation.

Preliminary discussions regarding The Deb

26. I first met Rebel on 22 July 2022 at the Corinthia Hotel in London. Amanda, Esme Thompson (my assistant at the time), Vince, and Charles Collier (Rebel's agent) also attended the meeting. I recall discussing with Rebel her desire to direct a full-length musical feature film, called 'The Deb', which I was curious about because it would be her first time directing anything; not even a short film or music video. The Deb was based on a screenplay written by Australian Hannah Reilly (**Hannah**), which was in turn based on a musical written by Hannah and Megan Washington (**Megan**) (who is also Australian).
27. I only remember the principles of any potential deal being discussed loosely at the meeting. I was more focused on the creative issues while Vince took the lead on financial matters.
28. In general terms, the proposal was that AI Film would arrange the finance to produce a film version of the screenplay, while Unigram would provide production services (by "loaning out" Amanda and myself as producers). Rebel would then direct, co-produce, and co-star in the film.



29. Those general terms, and others, were recorded in a 'Co-Production Deal Memo' between AI Film and Camp Sugar which was signed on 27 February 2023 (**Deal Memo**). My understanding was that the Deal Memo was intended to record some of the terms for the making of The Deb before formal legal documentation was agreed. Unigram was not a party to the Deal Memo.
30. In the remainder of 2022, I had further discussions with Rebel about progress on The Deb. At this point, my main concern was the script which I thought was too long and needed work. On one occasion, I met with Rebel in person at her home in Los Angeles. That was around mid-October 2022. We also had a number of discussions over Zoom or Teams where we would discuss the path to production. The intention was to have regular discussions, but occasionally it became less regular in practice.
31. In December 2022, Rebel and Amanda and I were in Australia conducting some preliminary casting for the film. I recall that all three of us were staying at the Park Hyatt Hotel in Sydney.
32. During that time, I was also having meetings trying to find a local producer to work on the ground during production and with various governmental funding bodies who offer rebates and tax incentives. Rebel did not attend those meetings.

Pre-production of The Deb

33. Pre-production on The Deb began after the signing of the Deal Memo in February 2023.
34. I do not remember having discussions with Rebel during the pre-production period about the use of special purpose vehicles for production of The Deb or how the various rights were to be held. Vince would have taken the lead on those kinds of discussions.

Bunya

35. Bunya was also engaged in the production of The Deb. The agreement to engage Bunya was reached in around February or March 2023.
36. Bunya's role was to be the local producer for the film. Bunya (through David and Greer) had valuable experience (having produced a film with a first-time director before) and relationships with suppliers and cast and crew located in NSW and Australia more broadly. They also had knowledge of local tax incentives and rebates that were crucial for the film's budget. Being based in the UK, Amanda and Vince and I had few of those contacts or knowledge.
37. Beyond having local connections and knowledge, Bunya's role was to be in the front seat for production of the film. The idea was that it would handle all the day-to-day tasks involved in pre-production and production with occasional input from AI Film or Unigram. As it happened, Amanda and I had larger roles in the production of the film than we had originally intended (as set out below).



Launch party for The Deb

38. On 24 May 2023, I attended a launch party for The Deb on Sir Len Blavatnik's yacht. The launch party became part of an event that was held annually for Access Industries and Warner Music. I thought that it was very generous in allowing The Deb to benefit from the publicity at that event without us contributing to the cost. Independent films rarely get an opportunity to announce themselves like that.
39. I never saw anything untoward at the event or afterwards. The event was well-attended, including by representatives from Screen Australia and the Press, and there was a photographer present taking pictures. It also benefited from the work done by public relations firm DDA which we engaged to increase publicity and attention for the film.

The budget

40. The Deal Memo contained an initial indication of the budget for The Deb of AUD \$15 million.
41. As the local producer, Greer and Bunya took the lead in managing logistics and the budget for the film. Each head of department bore some responsibility for the budget for their own particular area. However, in terms of managing the budget as a whole, Bunya was supported by the line producer (Tiare Tomaszewski), the cost manager, and the accountant (Jill Dures) and her accounts team (for payments and payroll).
42. I was also involved in supporting Greer and Bunya with organising and revising the budget. In part, that was because AI Film was providing the finance for the film. It was also because, as far as I was aware, Bunya had not previously produced a single film with this large a budget or a musical film of any kind. I have a lot of varied experience in film, television and music production (as set out above) which I was able to use to support Bunya in finalising the budget.
43. As I have set out above, the budget for a film undergoes a number of revisions and is not considered finalised until the financing closes. That was the case with The Deb. In fact, The Deb's budget was not finalised until after shooting had commenced.
44. During pre-production, a number of revisions had to be made to the budget for reasons including:
- (a) the quantum of risk capital of the film for AI Film and Unigram — by that I mean the relationship between the money invested by AI Film and Unigram and what the film could be expected to sell for;
 - (b) the need to hire specialist contributors (for example, choreographers and film musical producers) from outside Australia;
 - (c) taking advantage of local tax incentives;




- (d) estimates of production costs crystallising into real numbers closer to production;
 - (e) an increased role for Amanda in developing and producing the music for The Deb following Megan ceasing to have involvement in the film;
 - (f) an increased role for myself as a producer; and
 - (g) estimates of actors' costs and the need for various roles changing, particularly the idea of 'stunt casting' (i.e. casting a famous actor in a small cameo role that was simple to film but could have a significant effect on the film's sale).
45. I did not have the ability myself to manipulate the budget, or pay anyone. Everything had to go through someone else on the production team (for example, Greer).
46. Rebel never seemed to me to be that interested in The Deb's budget or how it was being put together. I cannot recall her asking me for copies of the budget. If she had, I would have been happy to provide it to her. She also would have been welcome to attend the frequent meetings I held with Greer and Bunya about the budget.
47. On 30 May 2023, there was a meeting in Unigram's offices with Rebel, Amanda and myself. Vince may have also been present as I remember him being in and out of our offices around that time. I recall Rebel being shown a preliminary version of the budget which was current at that time (but which was still being developed and discussed and was very far from being final). The target budget of \$15 million was always expressed in Australian dollars. This was reflected in what was agreed in the Deal Memo.
48. I have set out, above, a number of reasons why The Deb's budget was subject to a number of changes during pre-production and the early weeks of production. Most of those changes increased the budget.
49. Around three weeks into filming (which started on 17 October 2023), the budget was finalised at AUD \$21.8 million (well above the original AUD \$15 million). Having said that, even after the budget has "finalised", there can still be cost increases (the "overages" which I refer to at paragraph 25 above) or reductions. These are sometimes accounted for as "variances" in the budget and recorded in the cost report which is distributed regularly to all the producers.
50. In any independent film like The Deb, the production team will be concerned about going over budget. In the case of The Deb, I was concerned about the increases to the budget but accepted that the changes were necessary to produce the quality of film that was needed to be a commercial success.
51. I had a number of conversations with Greer in which she expressed her worry about the budget. She expressed to me that she was worried that if there was a shortfall in funding Bunya would be liable, at least reputationally, for the shortfall. That was not how I understood the arrangements for the film. If there was a funding shortfall, it would not



have fallen on Bunya, but rather on AI Film. But despite that, I understood this to be an ongoing concern for Greer.

52. On 14 August 2023, after several discussions on Zoom and telephone, I sent an email to Greer, copying in Matt Reeder (**Matt**) (a freelancer producer working for Bunya), proposing some amendments to be made to the budget. A copy of that email is at pages 1-2 of Exhibit GC-1. The proposed changes were not designed to reduce The Deb's budget. My email was in response to emails which had been sent earlier by Greer and Matt. This was part of ongoing discussions we were having about the budget.
53. There were several reasons behind my response to Greer and Matt.
54. One reason was to move funds around the budget to see if they could be made "QAPE-able" (I wrote it as "Quape" in my email). "QAPE" means Qualifying Australian Production Expenditure. It refers to the proportion of a film's expenditure incurred locally which then provides a basis for a tax rebate. To be eligible as QAPE, the expenditure had to be recorded against an individual rather than a company, and that individual had to have spent sufficient time in Australia during production. Therefore, for a budget line item to qualify for "QAPE" it had to refer to an individual (such as Amanda or myself) who would be spending sufficient time in Australia working on the production. By around this time, we thought we would have to attend much of the pre-production, production and post-production ourselves in Australia.
55. Structuring the budget in this way is common practice and was at least supported by Greer, if not her idea in the first place. A copy of an email sent by Greer to Vince and me on 5 August 2023 is at page 3 of Exhibit GC-1.
56. Another reason for the suggested changes in my email was to reflect the increasing role that Amanda and I had in the production of the film. As I set out elsewhere in this affidavit, Amanda had an increased role in the music production and I had an increased role as a creative producer. I was also conscious that as pre-production went along the budget was often increasing. I thought it would be useful to keep money "ring-fenced" in the budget as producer fees to be tapped into later to either cover unexpected additional production costs or meet the costs of third party financing (which I knew, based on my discussions with Vince, that AI Film was exploring at the time to cover the increase to the original budget).
57. I suggested the changes at a time when the legal documentation for the film was not yet finalised and fees (including Rebel's fees which were later increased) were still being negotiated. I knew the suggested changes would be the subject of further discussion.
58. As I have set out above, Amanda and I do not have personal contracts for our work on a film, and any fees are paid to Unigram. Line items in the budget referring to Amanda or me personally are designed to ensure the film received the full benefit of Australian tax



incentives, not to show any money being paid directly to us. At the date of this affidavit, Unigram has not received any fees for work done on The Deb (nor has AI Film, to my knowledge).

59. I never told, or asked Greer, not to share the budget with Rebel. I am not aware of Vince having ever done that either. As I have set out above, I was happy for Rebel to see the budget if she wanted, but she did not seem particularly interested in it. Nor, to the best of my recollection, did she ever ask me for a copy of any version of the budget.
60. There were a few occasions when I discussed sharing The Deb's budget with Greer:
- (a) In April 2023, I confirmed with Greer in response to a question about budget discussions that I had told Rebel that she could talk with Bunya about anything. A copy of that email chain dated 3-20 April 2023 is at pages 4-11 of Exhibit GC-1.
 - (b) There was one occasion during pre-production when Greer told me that she had sent the budget to Rebel. I told Greer that this was fine. I had no issue with Rebel seeing the budget.
 - (c) On that occasion, or another occasion when we were discussing the budget, I asked Greer if she had explained the budget to Rebel. The budget was constantly moving around, and I was concerned that Rebel did not have the experience with film budgets to understand how everything was coming together. When I arrived in Sydney in October 2023, I asked to convene a budget meeting with Rebel and the full team to run through every line item in the budget and zero all the variances that had occurred in the working budget. This meeting took place at the production offices in Callan Park.
61. Other than those occasions, I cannot recall any discussions with Greer about sharing the budget with Rebel.
62. It was Vince's role to manage the payments from AI Film to DD or Bunya's bank accounts. At the other end, it was mostly Greer who would make requests for Vince to transfer more funds to meet various expenses.
63. The budget for The Deb was not transferred in one lump sum payment. Instead, smaller payments were made over the life of pre-production and production. In my experience, this is standard practice in order to manage the release of funds and ensure that costs and finance reporting stay on track throughout production.
64. The other part was that AI Film did not have the full budget sitting in a bank account ready to be transferred. Vince was working behind the scenes with AI Film's bank, backers and creditors to come up with the money as it was needed. As the budget increased, more work was required to deliver the money.

65. There was no need for Greer, Rebel or anyone else to “sweet talk” or “stay in good favour” with anyone at AI Film to ensure payments would be sent through. AI Film and Unigram were the financiers and the producers of the film. The companies, along with Vince, Amanda and myself personally, were all committed to ensuring the film was a success. There would have been no reason to withhold payments and jeopardise the production of the film. By October 2023, AI Film and Unigram had already committed millions of dollars in funding and our only chance to recoup that funding was by producing a finished film.
66. I have referred above (at paragraph 49) to cost reports which were distributed regularly to all producers. Those reports detail all outgoing payments, costs and expenses incurred by the film in a particular period. They are not designed to show the value of rebates or income which are only estimated and not finalised and known until after filming has finished.
67. As I have said above, the budget was only finalised around three weeks into filming at AUD \$21.8 million.
68. While the budget contained line items for fees for production and financing services provided by AI Film and Unigram, neither company has collected any fees as at the date of this affidavit.
69. In my experience in independent film, producers’ fees are the first item to be deferred when the budget is at risk of being overspent, and that is what occurred here.
70. Independent film producers who are also involved in financing the film generally rely on the film being profitable to collect fees and a return on their investment.
71. As I have set out above, I have never collected any money personally from films, including The Deb. All money goes to Unigram.
72. The budget for The Deb does contain some line items which refer to Amanda and me personally. Those line items refer to hands-on work that Amanda and I planned to do (and did do) in Australia and on set. Splitting out those fees from the general fees for Unigram would allow the film to take advantage of favourable tax rebates in Australia.

The effect of Rebel’s commitment to Bride Hard on The Deb

73. I cannot recall when, but I remember being told by Rebel at some point during the pre-production period about another of her films: “Bride Hard” (**Bride Hard**). Rebel was cast in a lead role in the film and shooting for the film was to take place during the pre-production period on The Deb.
74. Amanda or I (I cannot recall which) advised Rebel that she was needed in Australia during pre-production on The Deb. As the director (and a co-producer), there was a lot of preparatory work that was required to be done before production would begin towards the end of the year.



75. Although Rebel had initially told us that she was not fully committed to *Bride Hard* and that the forthcoming strike action by the WGA and SAG would likely prevent the film from starting production, she did end up performing the role. The shooting schedule for *Bride Hard* ensured she was not in Australia during early pre-production and meant that she was unable to work on the script for *The Deb* as planned. With the script not finalised, we had to push the schedule for the film back to accommodate her, which had a disruptive knock on effect to our entire budget and production schedule.
76. I never contacted the producers of *Bride Hard* about Rebel's role with the film. I did contact Rebel's UK agent (Angharad Wood, a talent and literary agent at the agency Tavistock Wood, which represented Rebel) about my concerns with the overlapping schedules. I was hoping to explain why this would put pressure on our schedule and get an assurance that Rebel would leave the set of *Bride Hard* and arrive in Australia with sufficient time for *The Deb*'s production.
77. I have never seen, or asked for, Rebel's acting contracts for *Bride Hard*.

Music for The Deb

78. As I have set out above, the budget for any independent film is frequently changed in pre-production and into production. This was true for *The Deb* and one of the key parts of the budget that was subject to much discussion and variability was around the production of music for the film and the potential soundtrack. After discussion with Bunya and Rebel, neither of whom had any experience in the production of first class music, it was decided that the budget for the soundtrack would run directly through Unigram in the UK while the costs relating to music for the film remained in the budget managed in Australia. This arrangement was decided to reduce the need for the temporary finance staff employed to manage the budget in Australia to have to manage payments back to the UK and Europe, particularly in the event that the production of the soundtrack exceeded the likely production time of the film, and to prevent unnecessary costs incurred in changing currency.
79. As I have also set out above, once Megan had ceased her involvement in the film, Amanda had to step up to develop and produce the film's music. Fortunately, Amanda was able to secure a significant advance on the film's soundtrack from Warner Music UK with whom we have a long and successful working relationship. One of the conditions for the advance was that Amanda herself would be involved in producing the music given her track record in producing hit records.
80. Other changes to the music budget included hiring the recording studio at Abbey Road which is one of the few recording studios with the full orchestral rooms required for *The Deb*'s soundtrack, and additional producers. All of these changes were necessary to ultimately produce better music for the film.



81. Most of the producing and recording for the music was done in the UK and Europe given our lack of knowledge of the facilities and people able to do the work in Australia. With the agreement of all parties, for the reasons set out above, Unigram ended up handling this part of the budget.
82. Unigram remains out of pocket for its work on the music. At the time of swearing this affidavit, Unigram has spent in excess of £205,000 and only received an advance of £150,000

Payments to Hannah Reilly

83. Before Amanda, Vince and myself were involved in the film, Rebel and Camp Sugar had reached several agreements with Hannah. As I have set out above, we were informed by Rebel that Hannah wrote the original screenplay for The Deb.
84. During pre-production, I had not seen copies of all of Hannah's agreements. It was only later that I became aware, through Greer, that if the budget for The Deb exceeded AUD \$15 million, then Hannah's fee under the agreements would significantly increase (I believe double).
85. Greer attempted to negotiate with Hannah's agent to reach a compromise; however, her agent was firm in pressing for what was agreed. In the end, Hannah was paid the amount to which she was entitled under the agreements previously agreed with Rebel prior to our involvement in the film.

Rebel's allegations about Amanda

86. I was not in Australia for the beginning of pre-production. I did not arrive in Australia until 7 October 2023, just prior to shooting commencing.
87. On 5 September 2023 (noting the time zone difference between the UK and Australia), Amanda told me that she had suffered a medical incident at Bondi Beach where she had a severe reaction after swimming in the cold water and had to be taken back to the apartment in which she, Pia Ashcroft (**Pia**) (an employee of Unigram working on the production team for The Deb), and Charlotte MacInnes (**Charlotte**) (a lead actor on the film) were staying.
88. Amanda told me that Charlotte had been present during the incident and had helped her (including by putting her into a warm bath back at the apartment).
89. Amanda told me that Pia was also present and helped her and made them both tea.
90. I never thought there was anything untoward in the interaction.
91. I cannot now recall exactly when I first learned that an allegation was made that Amanda had behaved inappropriately with Charlotte or that Charlotte had been made to feel



uncomfortable, but I knew that those allegations were not true. Amanda would never do anything like that.

92. Despite knowing all of that, these sorts of allegations should be taken seriously. I was reassured that Amanda was taking the allegations seriously and was following what I considered to be a formal HR process.

Amanda leaving for London

93. Amanda left Australia on or around 22 September 2023 to return to the UK where we both live. This was a planned trip to see me and our children on my birthday.
94. Amanda's role with The Deb was more focused towards producing and developing the music for the film, which she did in Sydney in September 2023. I have more experience in the physical production of film. With her role, there was no pressing need for her to work from the set of the film as she was able to view the 'dailies' of the film via the internet.
95. In contrast, in my role as a creative producer, the time difference between the UK and Australia required me to work from the set of the film given the nature of our production schedule and the need to watch scenes being shot in real time and to make quick decisions relating to the production. On The Deb, I found myself working on set for nearly the entirety of the production period. In part, this was to support Bunya because, as far as I was aware, they had no experience in producing a musical film and this film was bigger in terms of budget than the films they would ordinarily produce. It was also to provide additional support for Rebel who was not only a first-time director but was also juggling roles as an actor and co-producer on the film, as well as to liaise with the international members of the team we had hired (such as Rob Ashford (Choreographer) and Ian Eisendrath (Executive Music Producer)).

Walk on Bondi Beach with Rebel

96. I arrived in Australia in early October 2023 just prior to production starting.
97. On 7 October 2023, which was a Saturday night shortly after I arrived, I had dinner with Rebel, Ramona, Greer, David, and Steven McGregor (a writer and director friend of David's). I found the dinner very pleasant and thought that everybody was getting along well.
98. I was aware that during the dinner Rebel left to join a Zoom call with Amanda and Vince. I was not invited to and did not join the call.
99. Later that evening Rebel texted me about the call. We exchanged the following messages:

Rebel: *Gregor, that call went really badly.*

Me: *Oh dear – why? Vince?*




Rebel: *Let's talk in person, maybe tomorrow if you have time*

Me: *I have all the time! I'm here for you! Let me know whatever you want to do, I'll probably be up at 3am.*

100. I asked whether Vince was the reason for the call going badly, as I knew from my own experience that Vince in his capacity as a financier sometimes has to be quite direct in discussions, particularly about money. I thought that this may have been the reason that Rebel thought the call went badly but I had no direct information. At this point, I had not had an opportunity to speak with either Amanda or Vince about the call and had no idea what was said or covered.

101. The next morning, Rebel and I exchanged the following text messages:

Me: *Morning! Let me know what's good for you today?*

Me: *Can I make you guys some breakfast?!*

Rebel: *Hi Gregor, do you wanna meet in the lobby for a small walk?*

Me: *For sure – now?*

Rebel: *Yeah when can you be ready?*

Me: *2 mins*

Rebel: *Okay meet you down in courtyard area in 2 mins*

102. Rebel and I met and went on a short walk for around 10 minutes at Bondi Beach. I recall reassuring Rebel more than once that all I was there to do was to make a great film. I tried not to make any comment about any issues to do with the Zoom call as I still had not spoken to Amanda or Vince about it.

103. I do not recall Rebel saying much in response. I definitely did not belittle Rebel or her skillset. I never bragged about having power or suggested that she had no power. I have never bragged about my relationship with Sir Blavatnik. It would have also been impossible for me to have mentioned a gathering at Blenheim Palace which was not conceived of and did not occur until the following year.

104. I never at this time, or at any other time, told Rebel to stop work on the film. I am not aware of anyone else telling her that either.

Discussion with Rebel on set

105. Within the next few days, I had an opportunity to speak with Amanda. It had been difficult to find a chance to speak with her given the time difference between the UK and Australia. It was from Amanda that I first learnt of a phone call between Ramona and Sir Blavatnik. I had also learnt that there were unspecified allegations that had been made involving Amanda.




106. At my next opportunity in the production offices, during the camera tests where I was sure there would be people around, I went and had a conversation with Rebel in Greer's presence. The gist of the conversation was as follows:

Me: *What is the issue with Amanda? Are you talking about the issue with Charlotte?*

Rebel: *Other people have made allegations.*

Me: *What allegations?*

Rebel: *I can't tell you that. There are things about Amanda that you don't know.*

107. At this point, Greer walked away. I did not wish to have a conversation about this with Rebel alone, so I ended the conversation by walking back to the offices. The conversation was very short. I found Rebel's comment, that there were apparently things about Amanda (my wife of many years) that I did not know, very strange. By this time, I had seen all of the cast who I knew and I was confident that there were no unresolved issues around Amanda. Other than Rebel's cryptic comments, nobody else had said anything to me about Amanda other than very positive comments, including Greer who was singing Amanda's praises.
108. We did not discuss Ramona's call to Sir Blavatnik at all. We did not speak about the allegations involving Amanda and Charlotte. I also never said that I wanted to speak to Charlotte about anything. As far as I was aware at that time, the misunderstanding about the events of 5 September 2023 had been cleared up. I did not say that anyone would pay for lawyers.
109. I cannot recall exactly now, but I may have said something to Rebel about being happy to refer any issues to the authorities. I would not have referenced the police specifically given I did not know the specifics of these apparent allegations and therefore if the police were the right authorities to contact. I had no issue with the authorities getting involved. Amanda and I had done nothing wrong. If referring the issue to the authorities was what it took to satisfy Rebel and clear everything up, I was very happy for that to happen.
110. The conversation did not end with any discussion about halting or continuing production. As I said above at paragraph 107, I walked away from the conversation when I noticed Greer had left.
111. I never at this time, or at any other time, made threats to pull our funding from the film. Al Film and Unigram had already sunk millions of dollars into the production of The Deb. The only way that money would be recouped was with a successful film. It would make no sense for us to pull funding from the film.



112. I never suggested that I would ask Sir Blavatnik to pull all the money because he was rich and would not care. I never suggested that Sir Blavatnik would do what I, or anyone else, would tell him to do.

Fallout from my meeting with Ross Emery, Rob Ashford and David Jowsey

113. At around this time, David and I discussed arranging a meeting for Rebel, Ross Emery (**Ross**) (The Deb's Director of Photography), and Rob Ashford (**Rob**) (The Deb's Choreographer). David thought it was a good idea given Rob had just arrived in Sydney later than expected and had a lot to catch up on. Rebel was invited to the meeting but did not attend. I cannot recall exactly why she did not attend — she had either worked from home that day or had gone home early.
114. The meeting was productive and a very useful opportunity to discuss logistics with Ross, Rob and David.
115. The next morning, on my way into the production offices, I received a call from Rebel. She was screaming at me about why the meeting had happened without her. She sounded very mad and angry. I cannot recall exactly what she said, but it was something along the lines of "*What genius organises a meeting without the director*" and "*Ross was very upset about it*". I reacted calmly and suggested that we speak in the production offices as I was currently driving there.
116. When I was in, I went to speak to Ross about the meeting to apologise if I had upset him. Ross told me that he had not complained about the meeting at all and that he had found it very useful.
117. It was apparent to me after that call that a misunderstanding had occurred about the meeting. I did not think Rebel's reaction was justified, but all the same I thought I should apologise for the misunderstanding and at the same time seek some clarification about the allegations that were apparently being made about Amanda.
118. On 12 October 2023, I sent an email to Rebel with that apology, asking about the allegations about Amanda, and expressing my support for her and the film. A copy of that email is at page 12 of Exhibit GC-1.

Relationship with Rebel

119. Although I was frustrated about the unspecified allegations that Rebel was making about Amanda, and with certain things she had done (for example, screaming at me about the meeting with Rob, Ross and David), I also understood that she was under a lot of pressure. She was a first-time director who was also acting in and producing the film.
120. As I have set out above, it was always in my interests, and those of AI Film and Unigram, to help make a successful film. Part of getting to that point was supporting Rebel. For example, on 14 October 2023, Rebel and I exchanged the following messages:




Me: *Hey Rebel, I just want to say what an amazing job you've done on the script. I've finally had a chance to read it properly and listen to the incredible songs along side it today and I just love it all so much. It made me think back to the first time we met in London and the confidence and comedy you just radiated. I know you're going to direct the hell out of this film. Reviewing the tests on Frame and filled with excitement for Tuesday, I hope we can all continue to collaborate and create something ground breaking, earth shattering and award winning. Xx*

Rebel: *Thank you so much Gregor. I have worked so so hard and will continue to give this film everything I have. I am grateful to have such an exceptional team. I have the utmost confidence that this film will be exceptional, highly commercial and bring so much joy and positivity to so many around the world x"*

Shooting of The Deb

Producers' meeting

121. Filming started on 17 October 2023.
122. Even though we had started filming, we still had an issue with the chain of title to the rights to The Deb. At that time, the rights were still held by Camp Sugar. It was necessary to move the rights to the special purpose vehicle for the film. The special purpose vehicle was the company over which the lenders for the film (through AI Film) had their security rights. If the rights remained with Camp Sugar, then the lenders would eventually notice and there would be an issue.
123. Moving the rights of a film to a special purpose vehicle is not unusual and it was something which the parties had agreed on in the Deal Memo. However, at the time filming started, Rebel had still not signed the necessary chain of title documents on Camp Sugar's behalf. I recall saying to Greer and David that I thought we needed a meeting to explain to Rebel how our funding relied on the chain of title documents being signed and clear up any other queries or issues Rebel had with the underlying documentation. It was this that prompted the meeting between Greer, David, Rebel and myself on 18 October 2023. Greer and David called the meeting. I did not call it myself or insist that anyone came.
124. The meeting was held in an upstairs room of an historic house that was being used for the production team on set in Carcoar, New South Wales. The room had four desks and some chairs. I do not remember whether there was a lock on the door. I certainly did not lock the door.




125. I sat in the furthest corner of the room. Rebel and Greer sat nearest the door and David sat in an armchair under a window to my left. I never prevented, or attempted to prevent, anyone from leaving.
126. We discussed the outstanding chain of title documents and other agreements that needed to be finalised (for example, producer and director agreements). There was also discussion about the rights to the music used in the film.
127. I also brought up the unspecified allegations that were being made by Rebel against Amanda. I asked Rebel a question along the lines of "*Do you have any allegations against Amanda?*". As I have set out above, I was sure that the misunderstanding around the events of 5 September 2023 had been cleared up. However, Rebel had continued to say that there were allegations but was not saying what they were. After I had arrived on set, I had spoken to many members of the cast. Nobody had raised any allegations or issues, and it seemed to me that it was only Rebel who had some sort of issue with Amanda. I wanted to raise the issue with Rebel again to confirm there was nothing outstanding that needed to be addressed.
128. After Rebel said in the meeting that there were allegations that she could not discuss with me, I made a suggestion that we suspend filming until the allegations had been investigated by the proper authorities (although, as I have set out above, given I did not know what the allegations were, I did not know who those authorities might be). A hiatus in filming is not unusual in certain cases (for example, illness or injury of key people). If there were outstanding allegations that were not being addressed, I did not see how we could continue filming.
129. I recall David asking Rebel whether she was making allegations or whether they were only her opinions. Rebel said they were only her opinions. I was reassured by that as I understood there is a distinction between an allegation and an opinion. If there were no further allegations, then there was nothing from my perspective that needed to be actioned.
130. Another topic of discussion during the meeting was the music rights to the film. I (along with Greer and David) tried to explain to Rebel that published music writers would not assign their rights in the music to the film but only provide a licence. This is standard industry practice and something that would apply just the same to any rights Rebel may have to any music she had written.
131. Greer did appear to me to be upset at points during the meeting. I understood why she might be upset. We were speaking about uncomfortable things including allegations of inappropriate conduct. While I was frustrated about various parts of what we were discussing, I remained calm throughout and never raised my voice. Rebel never appeared



to me to get upset (although it was slightly hard to tell as she was in full costume and makeup).

132. It was David who suggested that we should record a memo from the meeting. He kept notes throughout the discussion. It was also David who later suggested that we all sign the memo in agreement of the notes. I never suggested that we prepare a document or that it be signed, although I thought David's idea was a good one.
133. After the meeting, I sent an email to Greer and David summarising my thoughts from the meeting. Copies of that email (with separate replies from Greer and from David) are at pages 13-14 of Exhibit GC-1.
134. David circulated the memo after the meeting. There was nothing that was prepared or signed in the room. Once the meeting had finished, we all simply left the room. A copy of the email from David circulating the minutes is at pages 15-17 of Exhibit GC-1.
135. As I have set out above, I have never threatened to abandon the film. It was not in my interests, or AI Film and Unigram's interests, to do so.
136. I never yelled out to anyone approaching the room or knocking on the door during the meeting to "go away".
137. While there were separate discussions about including "morality clauses" in Amanda and my contracts (which I was reluctant to agree to as I thought it would be used as a basis for more false allegations against Amanda in particular), I never suggested that Amanda or I were in some special position because of a relationship with Sir Blavatnik.
138. I never said that people would only be allowed to leave the room if they agreed to sign a document. As I have explained above, it was David's idea to sign a document. I was not present for anyone else signing their copy of the meeting document and I never said that funding for the film was conditional upon people signing the document.

Relationships and behaviour on set

139. I was in Australia and on set for most of the production of The Deb. There was a period where I returned to the UK as my mother was ill and later passed away. I paid for my flights home and back to Australia myself, I did not charge anything to the film.
140. When I was on set, I did my best to keep my distance from Rebel. The allegations she had made about Amanda had concerned me. While I thought everything had been cleared up, particularly following the producer's meeting, I was still cautious. I was concerned that if I interacted with Rebel, especially without anyone else (like Greer) present, she might come up with more false allegations against Amanda or myself.
141. Even so, as I have set out above, I was committed to the success of The Deb and part of that was continuing a professional relationship with Rebel. It would have been impossible in my role not to interact with Rebel as the director of the film. For example, one of my




tasks was to review the dailies and rushes (the raw footage at the end of the day's filming) to ensure we had the right footage and performances to complete the film in the best way possible. I would provide feedback subtly via David, Greer and others to Rebel about the shots we had and what more we would need or what we could do to improve them. In doing so, I only ever had the best interests of the film at heart. It was not intended as any personal criticism of Rebel. I saw it as part of the collaborative process which any film requires.

142. An example of the kind of feedback I would give is in an email I sent to Rebel on 7 December 2023. A copy of that email is at page 18 of Exhibit GC-1.
143. I never said to Rebel that her work was not up to standard or that she was failing as a director. I never heard Amanda or Vince say those things either. As I have set out above, I never threatened to abandon the film.
144. I was also conscious that Rebel was juggling a lot of different roles: as a director, a producer, and an actor. I had no doubt that this was tiring and stressful for her. For that reason, I would try to show Rebel my support and provide her with encouragement. Sometimes this was through a text or an email. For example, after attending the lunch that Rebel had organised on 22 October 2023, I sent the following message to Rebel:
- Hey Rebel, thanks so much for an incredible afternoon! I think it was a massive boost for the crew and cast. Look forward to tmrw. Xx*
145. Other times, I would get her a small gift (for example, I bought her a director's chair with her name on it and a holder for her phone to help her view rushes). A copy of messages between myself and Jill (a production manager on The Deb) about the chair purchase is at page 19 of Exhibit GC-1. A photograph of the chair is at page 20 of Exhibit GC-1.
146. I am aware that Ramona has said in her affidavit (paragraph 50) that she witnessed me hugging Charlotte and walking away with my hand around her waist. I may have hugged Charlotte (and other members of the cast that I knew well) in greeting, but I would not have walked with her with my hand around her waist.
147. I do not recall seeing any personal security for Rebel on set.
148. Most of the time during filming, I chose to sit at a producers' monitor some distance away from Rebel and the shooting of the scene, often along with David and Greer. This is common practice for producers to be able to speak freely amongst themselves, concentrate on what they are watching, and avoid too many people being around the director and underfoot (particularly so in a musical with complicated staging and elaborate choreography). At the time, there was also still some concern for COVID social distancing.

149. I was never told by anyone that I could not go near Rebel on set. Indeed, sometimes I would pass by her or stand near her monitors while scenes were being filmed (although generally, as I have said, I tended to keep my distance from her).

Expenses

150. I never had a spa treatment or massage paid for out of the film's budget. As far as I am aware, Amanda never did either.
151. I recall that on at least one occasion Amanda used her own credit card to pay for Rebel's stay at the Park Hyatt Hotel where I believe Rebel had massages. Amanda submitted these costs as direct out of pocket expenses occurring in the pre-production of the film
152. In order to minimise costs, avoid hiring drivers, and maximise her time in Los Angeles, Amanda and I use a peer to peer car sharing App called TURO to rent a Porsche Macan which is a smaller and cheaper version of the Porsche we own at home, but has the same layout and controls, making it easy for us to drive. Using Turo is substantially cheaper than hiring a car through a traditional car rental firm. I believe that this cost or a proportion of it was charged through to the film.

Post-production

Relationships post-production

153. Similar to what I have described above during production, in post-production I attempted to maintain a professional relationship with Rebel while also acknowledging the pressure she was under.
154. Despite my efforts, the editing process in post-production became quite difficult for several reasons:
- (a) Rebel shut us out of the process. We could not give any comments to her directly about the assembly of the film. I had to send through my comments to Danny Cohen (**Danny**) (the President of Access Entertainment) to pass on to Rebel. I can only recall one occasion where I met with Rebel and Greer in The Post Lounge post-production facility in Sydney to review some scenes. That was not a final assembly of the film.
 - (b) Shockingly to me, Rebel also left Australia during the post-production process when the original agreement was that she would stay. It is very unusual for a director to leave the edit, let alone the country, for an extended period during the initial editing process. To my knowledge, no professional remote editing platform was ever arranged. This made editing and post-production substantially more difficult and time consuming than it needed to be.
155. Test screenings are sometimes used in film to test how an audience appreciates a film. Not every film uses test screenings, but it was something we used on The Deb. Part of

the reason we used it on The Deb was because Rebel requested it, and the other part was to highlight to Rebel herself the work which still needed to be done on the film (for example, that the cut was too long).

156. Test screenings can be done in a variety of ways. However, for The Deb we (Amanda, Vince and I) wanted to ensure that the screening was done properly and the results were useful. A company in Los Angeles was engaged to do the screenings. The company is well known and we had some confidence that they would do it properly.
157. I do not believe I made any unreasonable demands of Rebel during the post-production period.
158. I never instructed or asked for Danny's name to be removed as "Executive Producer" of the film. I am not aware of Amanda or Vince doing so either. If Danny's name was removed, it was definitely his decision.
159. I do not have any knowledge of Danny telling Rebel to pause all production on The Deb in January 2024. I do not know why Danny would say that, if he did so.

Offer of assistance from Barbara Broccoli, Miky Lee and Colleen Camp

160. I am aware of Rebel offering the help of Barbara Broccoli, Miky Lee and Colleen Camp in the sale and distribution process for The Deb.
161. The offer was raised with the film's international sales agent, Williams Morris Endeavour (WME). WME saw no value in the offer. They explained that none of the three had ever sold their own films. In fact, WME had often been engaged to sell their films. I also understood that Colleen Camp wanted to charge the production at least \$250,000 for her services and suspected she would also ask to be credited or for other incentives.
162. Their offer of assistance was never taken up.

ADR sessions with Charlotte

163. Automated dialogue replacement (ADR) is a fairly common part of film production. It involves an actor re-recording lines in a studio after the main production has finished. Those recordings are then overlaid back on to the footage shot during production.
164. In May 2024, Charlotte was in Boston working on a stage production of "Gatsby". Alongside other companies and Harvard's American Repertory Theatre, our company Unigram, Amanda, and our assistant Olivia Drubner were also involved in the production and, for that reason, I was also intending to go to Boston at the time, after staying with our kids in New York.
165. Greer and Henry Karjalainen (The Deb's Post-Production Supervisor) were trying to organise dates with Charlotte's agent in Australia for Charlotte to come into a studio in Boston to complete ADR. There was difficulty in finding a convenient time because




Charlotte was contracted to *Gatsby* and the team for that production was not willing to release her to come and finish work on *The Deb*. I was asked by Henry to help arrange a time.

166. I was able to intervene with the Head of Production at Harvard ART (the theatre company presenting *Gatsby*), in part because of my seniority at Unigram, and organise two hours for Charlotte to step away to do ADR for *The Deb* on 30 May 2024. Olivia Drubner made arrangements with Charlotte directly to attend.
167. On the morning of 30 May 2024, it was raining heavily in Boston. I walked by myself to the studio through the rain and was soaked through. When I arrived at the studio, the Sound Engineer who would run the session was not there yet. An assistant at the studio told me he was stuck in traffic. Given my clothes were soaked through and we had a long wait, I asked if any cameras could be turned off while we waited for others to arrive. The assistant was able to do so.
168. The Sound Engineer ended up being 45 minutes late. Olivia arrived shortly after me and together we waited. Olivia tried to call Charlotte and realised she had slept through her alarm. Olivia knew that Charlotte was staying with both her mother and her boyfriend and tried other numbers before reaching Charlotte. Olivia also had trouble ordering an Uber to the studio from Charlotte's accommodation because of the severe rain.
169. After Charlotte arrived, I asked her if she wanted the cameras turned back on. She said she was happy for them to be off.
170. I saw no issue with keeping the cameras off. As I have said, ADR involves re-recording lines to be overlaid onto existing footage. It is primarily a technical process that requires listening carefully to the lines being recorded while looking at the footage of the film to ensure that the two line up. It does not matter if you cannot see the person recording the lines. If anything, it is unhelpful to see them as it would distract from matching up the footage and the re-recorded lines. Neither Rebel, nor anyone else, asked about the cameras during the session.
171. After the delays, the ADR session went well and we got the material we needed from Charlotte. Everyone expressed how well the ADR session had gone.

Toronto International Film Festival

172. The Toronto International Film Festival (**TIFF**) is a major international film festival. TIFF was discussed amongst Amanda, Vince, Danny, WME and myself as a place to premiere *The Deb*.
173. As with any film festival, the decision to launch a film at TIFF is ultimately a commercial one. The benefits in terms of exposure to audiences and buyers are weighed against the

cost of taking a film to the festival and the potential for negative reviews from the public and buyers.

174. I understood that Greer had some experience preparing submissions for film festivals and for that reason she prepared The Deb's submission to TIFF. I do not know whether Rebel was involved.

Letter from Bryan Freedman

175. On 14 June 2024, I received a copy of a letter sent on behalf of Rebel by Bryan Freedman of Liner Freedman Taitelman Cooley, LLP. Mr Freedman's letter contained a number of very serious, and false, allegations against me personally, as well as against Amanda and Vince. Many of these allegations also related to Charlotte.

Offer to premiere at TIFF

176. In around June 2024, TIFF extended an invitation for The Deb to premiere on the closing night of the festival.
177. In my experience, the closing night is not considered a useful commercial screening for a film as compared with earlier slots in the festival. While the closing night at the end of the second week of the festival might get a lot of publicity, buyers for films are generally only present for the first week of the festival.
178. I was considering a number of competing factors for and against accepting the offer:
- (a) the disadvantage of a closing night slot;
 - (b) the costs of taking The Deb to TIFF (which in my estimation would have been upwards of US \$250,000);
 - (c) whether The Deb could be finished in time (at this stage the film was not finished);
 - (d) whether we could also negotiate to have conveniently placed other screenings in the first week of the festival in order to invite buyers — I understood TIFF screenings often have mixed audiences (by which I mean buyers and members of the public in the same screening) — a mixed audience tends to bring more life to the room while a screening is going on and indicates to buyers how audiences might react to a film; and
 - (e) despite the disadvantages of a closing night slot, TIFF did provide at least some opportunity to secure a deal with a buyer.
179. Also, while TIFF is a major international film festival, it was not the case that all the biggest movie stars in the world had films premiering at the festival that year.
180. In addition, at around the time of receiving the offer from TIFF to premiere The Deb, the film had also received a warning from AWG about writing credits on The Deb. They warned that, if Rebel insisted that she be given a "written by" credit on the film, contrary




to the AWG's ruling following the arbitration between her and Hannah, they would take legal action against the film.

181. For those reasons, the offer to premiere at TIFF was not accepted immediately. We were given further time by TIFF to continue to consider their offer. We had frequent calls with WME and I understand they were in frequent contact with TIFF.
182. Ultimately, the decision was made to accept the offer on the basis that The Deb would have additional screenings to the market earlier in the festival (in addition to the closing night premiere) and that any opportunity to sell The Deb was one worth taking.
183. I have set out, above, the reasons why the offer from TIFF was accepted. It was not because of any persuasion from Ari Emmanuel at WME.
184. Ultimately, the film received mixed-positive reviews from the premiere although Charlotte's performance was singled out for praise. People I knew within the industry praised her and expressed to me the view that she had a promising career ahead of her.

Rebel's Instagram post on 10 July 2024

185. On 10 July 2024, Rebel posted a video to her personal Instagram account.
186. In the video (which is still online), Rebel makes a number of allegations against me personally, including:
- (a) inappropriate behaviour towards the lead actress of The Deb (which I took to be a reference to Charlotte);
 - (b) embezzling funds from The Deb's budget;
 - (c) retaliatory behaviour following Rebel's reports of misconduct;
 - (d) that I, along with Amanda and Vince, was stopping The Deb from premiering at TIFF; and
 - (e) that I, along with Amanda and Vince, might prevent The Deb from being released at all.
187. These allegations are false.
188. I have never engaged in any inappropriate behaviour towards Charlotte.
189. As I have set out above, I was not even in Australia on 5 September 2023.
190. I have never embezzled any funds from The Deb's budget.
191. In my role as producer, I did not have the ability to manipulate the budget or pay out any money without going through another producer and The Deb's finance department. Also, as I've already said, neither Unigram (nor I) have received any money from The Deb because all of Unigram's producer fees have been deferred.



192. I have never retaliated against Rebel because she reported alleged misconduct relating to *The Deb*.
193. After I became aware that Rebel had made allegations against me and Amanda, I attempted to keep my distance from Rebel on set unless others (for example, Greer) were also around.
194. However, even during that period, I made an effort to maintain a working professional relationship with Rebel. My concern throughout the production of *The Deb* was to support Rebel as a first-time director and to produce a great film.
195. I never attempted to stop *The Deb* from premiering at TIFF.
196. As I have said, there was a period where I, along with others, considered whether TIFF was the right option commercially for the film. Once the decision was made to accept the offer, however, I never sought to stop the premiere (and I attended the premiere).
197. I have never sought to prevent *The Deb* from being released.
198. It is in my interests (and the interests of AI Film and Unigram) to see that the film is released. This enables AI Film and Unigram to recoup the money it invested into the project, and for AI Film and Unigram to collect their production fees.
199. Given the falsity of the allegations Rebel had made publicly against me, Amanda, and Vince, we commenced defamation proceedings in California against Rebel (in our personal capacities, not on behalf of AI Film or Unigram).

***Variety* article on 12 July 2024**

200. On 12 July 2024, *Variety* magazine published an online article which repeated some of Rebel's statements in her Instagram post and some aspects of Mr Freedman's letter.
201. I did not send Mr Freedman's letter to *Variety* (or any other news outlet) nor did I ask anyone else to send the letter to *Variety*.
202. I did not want the content of the letter to be public given the number of serious, and false, allegations made against me in the letter.
203. I am not aware of Amanda or Vince having sent the letter or having asked anyone else to release the letter.

Websites about Amanda and Charlotte

204. In around August or September 2024, several websites were uploaded containing more allegations about me and Amanda.
205. The websites suggested that I was involved in helping Amanda to procure "*young women for the pleasure of the extremely wealthy*" and that women who worked for Amanda and myself went missing.




206. The websites also included the following:

We won't stop. We're in this until Amanda Ghost is exposed for the evil that she is. As the Indian Ghislaine Maxwell, she trades on pleasure for protection...

Failing in music she turned full pimp, reinventing herself as a theatrical producer alongside her husband while really procuring young women for the pleasure of the extremely wealthy...

This strain of constantly procuring women could explain her company UNIGRAM's financial loss of 4.7M pounds last year. And let's only hope the hookers made up for losing her financier \$25M by mounting The Great Gatsby stage musical to simply reward an actress for remaining silent about the abuse she suffered at Ghost's hands.

207. None of the allegations against Amanda in the websites is true.

Premiere at TIFF

208. After shooting The Deb, an extensive editing and testing process was undertaken. The process was prolonged by various factors including the initial edit of the film not being good enough for screening. To the best of my recollection, a cut of the film was prepared just prior to TIFF in September 2024 for the purpose of the screenings at TIFF (a cut is a term meaning a completed version of a film following editing and post-production).
209. This cut was not the final cut in the sense that it was not the version of The Deb that would be released by distributors. Not only would the reaction at TIFF inform possible changes for the final cut, but the Shareholders' Deed (which had set up the special purpose vehicle for The Deb) included the ability to grant distributors cutting rights for the film. This meant that any cut was necessarily preliminary until an agreement was secured with a distributor(s) and they had decided what they wanted to do.
210. In the first week of TIFF, on or around 7 September 2024, The Deb was shown in a market screening at the TIFF to streaming services, and a group of US and Australian distributors.
211. On 14 September 2024, The Deb premiered in the closing slot of TIFF. This was the first, and to this date only, authorised public screening of the film.
212. After the premiere at TIFF, Vince (along with WME at times) led the efforts to secure a distribution deal for The Deb. I have not been significantly involved in that process as that is more Vince's responsibility than mine. Vince would generally keep me up to date on the status of his discussions.
213. From my role in connection with the film:
- (a) I never saw eight written offers for distribution of The Deb, much less ones which were not accepted.




- (b) As far I am aware, Apple had no interest in purchasing the film. I was informed that Apple had sent a representative to the market screening at TIFF before the premiere who promptly left the screening after ten minutes.

23 September 2024 Post

214. On or around 23 September 2024, Rebel posted a series of “stories” to her personal Instagram account. I understand these are being referred to in this proceeding as the **‘23 September 2024 Post’**.
215. The 23 September 2024 Post included allegations that an unnamed “producer” had made inappropriate advances to an actress by asking her to stay in the same apartment as them and asking her to have a bath and shower with them.
216. While the actress was unnamed, from the context of Rebel’s allegations I took it to be a reference to Charlotte.
217. The 23 September 2024 Post has been the subject of discussion and gossip within the industry. Many people I know within the industry have raised it, and Rebel’s other posts, with me.

16 May 2025 Post

218. On or around 16 May 2025, stories were posted to The Deb’s Instagram account. I understand these are being referred to in this proceeding as the **‘16 May 2025 Post’**.
219. Those stories referred again to The Deb’s release being blocked.
220. As I have set out above, I have never sought to prevent The Deb’s release.
221. As with the 23 September 2024 Post, the 16 May 2025 Post has been the subject of discussion and gossip within the industry and many people I know within the industry have raised it with me.

25 July 2025 Post

222. On or around 25 July 2025, Rebel posted some stories to her personal Instagram account. I understand these are being referred to in this proceeding as the **‘25 July 2025 Post’**.
223. Those stories included allegations that I (along with Vince and Amanda):
- (a) had bullied and harassed Rebel;
 - (b) had tried to prevent The Deb from premiering;
 - (c) had tried to stop The Deb from being released; and
 - (d) had power to sell and distribute The Deb but had not done so.
224. The stories also repeated the allegations about inappropriate behaviour towards Charlotte and theft of money from The Deb’s budget.





- 225. All these allegations are false.
- 226. The story also stated that Rebel was intending to post a video of the first song from The Deb. Later that day, Rebel followed up on that story and posted to her personal Instagram account a video of the first song from The Deb. She did not have any authority to do so.
- 227. On 28 August 2025, Rebel posted another video from The Deb to her personal Instagram account and The Deb's Instagram account. Again, she did not have any authority to do so.

Instagram post on 8 September 2025


- 228. On 8 September 2025, Rebel made further posts on her personal Instagram account.
- 229. The post and comment contained allegations that the "powers" or the "people in control" (which I took to include myself) were preventing The Deb from being released. These allegations were false.

Sworn by the deponent
 at London
 in United Kingdom
 on 24 February 2026
 Before me:

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) Signature of deponent



Signature of witness

EMILY ELENI GREENE
 SOLICITOR SHERIDAN SOLICITORS LLP
 SRA: 7020188 
 Name and qualification of witness