

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

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JOHN C. DEPP, II, SCARAMANGA)
BROS., INC., A CALIFORNIA)
CORPORATION; L.R.D.)
PRODUCTIONS, INC., A CALIFORNIA)
CORPORATION, INFINITUM NIHIL, A)
CALIFORNIA CORPORATION,)

PLAINTIFFS,)

vs.)

No. BC680066

BLOOM HERGOTT DIEMER ROSENTHAL)
LAVIOLETTE FELDMAN SCHENKMAN &)
GOODMAN, LLP, JACOB A. BLOOM)
AND DOES 1-30,)

DEFENDANTS.)

BLOOM HERGOTT DIEMER ROSENTHAL)
LAVIOLETTE FELDMAN SCHENKMAN &)
GOODMAN, LLP,)

CROSS-COMPLAINANTS,)

vs.)

JOHN C. DEPP, II, SCARAMANGA)
BROS., INC., A CALIFORNIA)
CORPORATION; L.R.D.)
PRODUCTIONS, INC., A CALIFORNIA)
CORPORATION, INFINITUM NIHIL, A)
CALIFORNIA CORPORATION,)

CROSS-DEFENDANTS.)

VIDEOTAPED DEPOSITION OF ALEJANDRO ROMERO
WEDNESDAY, JANUARY 30, 2019
12:50 p.m.

REPORTED BY: D'ANNE MOUNGEY, CSR 7872

Page 2

1 VIDEOTAPED DEPOSITION OF ALEJANDRO ROMERO TAKEN ON BEHALF
 2 OF PLAINTIFFS AT 355 SOUTH GRAND AVENUE, SUITE 2800,
 3 LOS ANGELES, CALIFORNIA, COMMENCING AT 12:50 P.M. ON
 4 WEDNESDAY, JANUARY 30, 2019, BEFORE D'ANNE MOUNGEY, CSR
 5 7872.
 6
 7
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 19 (NONE)
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1 LOS ANGELES, CALIFORNIA
2 WEDNESDAY, JANUARY 30, 2019; 12:50 P.M.
3
4
5 THE VIDEOGRAPHER: Good afternoon. We're
6 on the record at 12:50 p.m. on January 30th, 2019.
7 Please note that the microphones are sensitive and
8 may pick up whispers, private conversations and
9 cellular interference.
10 Audio and video recording will continue to
11 take place unless all parties agree to go off the
12 record.
13 This is media unit number 1 of the video
14 recorded deposition of Alejandro Romero taken by
15 counsel for the plaintiffs and cross-defendants in
16 the matter of "John C. Depp, II, et al., versus
17 Bloom Hergott Diemer Rosenthal Laviolette Feldman
18 Schenkman & Goodman, LLP, et al.," and related
19 cross-complaint filed in the Superior Court of the
20 State of California for the County of Los Angeles.
21 Case number BC 680066.
22 This deposition is being held at Reed
23 Smith, located at 355 South Grand Avenue,
24 Los Angeles, California 90071.
25 My name is Steven Togami from the firm

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1 Veritext Legal Solutions and I am the videographer.
2 The court reporter is D'Anne Moungey from the firm
3 Veritext Legal Solutions. I am not related to any
4 party in this action, nor am I financially
5 interested in the outcome.
6 If there are any objections to
7 proceeding, please state them at the time of your
8 appearance.
9 At this time, will counsel and all
10 present please state their appearances and
11 affiliations for the record.
12 MS. BILES: Brit Biles, Stein Mitchell
13 Beato & Missner, LLP for Mr. Depp and his companies.
14 MR. WRENSHALL: Mathew Wrenshall from Reed
15 Smith, LLP for Bloom Hergott and Jacob A. Bloom.
16 MR. WALDMAN: Speakerphone, Adam Waldman,
17 Endeavor Law for the plaintiff Johnny Depp.
18 THE VIDEOGRAPHER: Thank you.
19 Can we please have the oath.
20 ///
21 ///
22 ///
23
24
25

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1 ALEJANDRO ROMERO,
2 having been first duly sworn by the reporter, was
3 examined and testified as follows:
4
5 EXAMINATION
6 BY MS. BILES:
7 Q Good afternoon, Mr. Romero. My name is
8 Brit Biles and I'm an attorney for Mr. Depp and
9 some of the companies that he owns.
10 We're here today just to ask you some
11 follow-up questions from your prior deposition that
12 you gave concerning Mr. Depp and his former wife
13 Amber Heard.
14 Today, because we're on the record, we have
15 a court reporter taking everything down that I say
16 or that you say or anyone else says. So it's
17 important that we not speak over each other and that
18 we give each other a chance to finish talking. I
19 know it's hard to do, sometimes when you get in a
20 conversation, it's easy to jump in before the other
21 person is finished.
22 So I will do my best not to jump in and
23 interrupt you; will you do your best not to jump in
24 and interrupt me?
25 A I'll try. I'll try to do my best.

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1 Q Also, because she's taking down everything
2 we say, she can't record nods or "uh-huh's" or
3 things like that. So it's very important that we
4 try to use "yes" or "no" answers or full sentence
5 answers, if necessary, so she can take down exactly
6 what we're saying.
7 Is that fair?
8 A Yes, it is.
9 Q If you don't understand one of my
10 questions, please let me know. I'll do my best to
11 make them as clear as possible. I know sometimes I
12 will fail in those efforts, so just give me an
13 indication that you don't understand the question,
14 I'm happy to rephrase it. But if you answer my
15 questions, I'm going to assume you understood them
16 and they're your answers.
17 Is that fair?
18 A Yes.
19 Q Is there anything today that would prevent
20 you from being able to give truthful and complete
21 testimony?
22 A No.
23 Q I want to talk about a couple specific
24 things that you previously testified about, but I
25 want to go into some more detail with them.

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1 First off, where do you work, Mr. Romero?
2 A I work at the Eastern Columbia Building.
3 Q Where is that located?
4 A 845 South Broadway.
5 Q Is that in downtown Los Angeles?
6 A That's correct.
7 Q What type of a building is the Eastern
8 Columbia Building?
9 A It's a private residential building.
10 Q Is it condominium units?
11 A Yes, you could say that.
12 Q What is your job at East Columbia?
13 A I'm front desk.
14 Q How long have you worked at the front desk?
15 A I have been at that building for over ten
16 years.
17 Q What are your job responsibilities?
18 A Take notes if anything goes wrong, lights,
19 the packages, make sure nobody trespassing. This is
20 a secure building.
21 Q When you say it's a secure building, can
22 you explain what you mean?
23 A They need a key fob to enter the building.
24 The doors are locked.
25 Q Are you actually employed by the Eastern

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1 Columbia Building or are you employed by someone
2 else?
3 A I'm employed by the corporation that
4 manages the building.
5 Q What's the name of that?
6 A Action Property Management.
7 Q Is there security in the building?
8 A No.
9 Q As the person who sits at the front desk,
10 is security a part of your job responsibility?
11 A Yes.
12 Q Can you explain what you do to maintain
13 security in the building?
14 A Well, when somebody walks into the building
15 following one of our residents, I approach to them
16 and ask them if they need any help. And most of the
17 time they just want to take pictures because it's an
18 old building and they like the architecture of the
19 building, so they want to take pictures or they want
20 to go to the pool area. Sometimes they mistake the
21 East Columbia with the Ace Hotel and they think
22 there's a bar upstairs.
23 Q I see.
24 A So I approach to them and ask them if they
25 need any help. And like I said, most of the time

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1 they just want to take pictures.
2 Q Other than approaching people who enter the
3 building, is there anything else you do to maintain
4 security of the Eastern Columbia Building?
5 A Well, yes, actually, we have a garage and
6 there's a lot of people that -- they go inside the
7 garage. Sometimes they just try to get away from
8 the rain, from the cold, or just looking for
9 something to take.
10 Q So what do you do with regard to the
11 garage?
12 A Well, when I see someone entering the
13 garage, I go and do my patrols in the garage and I
14 try to do my best to locate the person and escort
15 him out.
16 Q You mentioned just now that you do patrols.
17 Can you explain what your patrols are?
18 A I check for graffiti, people sleeping
19 outside, and make sure -- like we have a gym
20 upstairs on the roof, make sure the doors are
21 closed, the monitors are off, the AC is off, check
22 the water and temperature from the pool and the hot
23 tub.
24 Q When you're patrolling in the building, do
25 you have a specific route that you take?

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1 A No. Actually, I always change it because I
2 don't like -- like people probably will -- probably
3 consider myself a little bit paranoid. I don't like
4 people to like check my time, approximately what
5 time I'm doing my rounds and where I'm going
6 exactly, so I do it different rounds.
7 Q Okay. Do you always try to visit the same
8 parts of the building when you do your patrols?
9 A That's correct.
10 Q What parts of the building are those?
11 A I start at the lobby, courtyard, laundry
12 room, pool area, garage, and the outside.
13 Q Do you use the elevators when you're --
14 A That's correct. Sorry.
15 Q How many elevators are in the building?
16 A Three elevators.
17 Q Are they all -- do they all go to all the
18 same floors or certain elevators for certain floors?
19 A Only two elevators go 12th floor -- go to
20 the 12th floor. There's one elevator only that goes
21 all the way to the penthouse.
22 Q Can anyone use the elevators or do you have
23 to have access for the elevators?
24 A They need a key to access the elevator. To
25 press any buttons on the floor, they need a fob.

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1 Q I see.
2 Are all of the residents issued fobs?
3 A That's correct.
4 Q What if someone has a guest coming in, how
5 does that work?
6 A If the residents allow them to have a fob,
7 they give them their personal fob or -- they're
8 allowed to have approximately three fobs. There's
9 two for -- one for -- two for the resident and
10 probably one for the maid. So sometimes they take
11 away from the maid and they give to their guest.
12 Q I see.
13 What if a resident chooses not to give a
14 guest a fob or hasn't given a guest a fob, how does
15 the guest access the building?
16 A We have a guest list for all our residents.
17 If their name is on the list, we send them up. We
18 use our personal keys to send them up in the
19 elevator. Or if they're not, we contact the
20 resident and let them know that someone is here to
21 visit them and they give access and say okay, it's
22 fine, we send them up. Other than that, we don't
23 send anybody.
24 Q Okay. You talked about maintaining
25 security in the building.

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1 Have we talked about all of the things that
2 you do to maintain security in the building at East
3 Columbia?
4 A Yes, I think that that covered everything.
5 Q What about security footage, are there
6 security cameras in the building?
7 A Yes, there are.
8 Q What role, if any, do you have with the
9 security cameras?
10 A Well, we have approximately right now 48
11 cameras around the building and we use them to see
12 the outside and the inside from the common areas,
13 see if anything goes wrong. Or like if -- most of
14 the time it's something got moved or out of place,
15 we know who did it. Like if someone is smoking, we
16 know -- there's no glass containers in the pool
17 area, so we use the cameras for that.
18 Q Is your job responsibility to monitor the
19 cameras?
20 A That's correct.
21 Q So how do you do that?
22 A I sit at the desk and I got two monitors,
23 color cameras, only for the cameras.
24 Q I want to back up.
25 You had testified that you had worked in

Page 16

1 this building for over ten years.
2 Have your job responsibilities been
3 consistent throughout the ten years that you've
4 worked there?
5 A Yes.
6 Q So if we're talking about 2015 or 2016, the
7 job duties that you're describing today are the same
8 job duties that you would have had then?
9 A That's correct.
10 Q In 2015 and 2016, did you interact with
11 residents of the building?
12 A Yes.
13 Q Can you give me some examples of
14 circumstances when you would interact with the
15 resident.
16 A Well, I've been there for a long time, like
17 I said, and I make conversation with them because I
18 know them for so long and they stop there and they
19 talk to me. And we have like -- talk about sports,
20 cars, and bars, anything like that. We have -- I
21 consider them like a friend there in the building
22 and I get along with a lot of the residents.
23 Q Are you aware that Johnny Depp was a
24 resident of the Eastern Columbia Building?
25 A Yes.

Page 17

1 Q Are you aware that Amber Heard was a
2 resident of the Eastern Columbia Building?
3 A Yes.
4 Q Did you personally have any interactions
5 with Mr. Depp when he lived in the building?
6 A I saw him a couple times and I ran into him
7 in the hallways and he usually was -- he was really
8 nice. He knows my name. He knows me by name.
9 Q What about Amber Heard, did you have
10 interactions with Ms. Heard?
11 A That's correct. Also the same thing. I
12 used to run into her and she knew my name. They
13 usually -- they used to get a lot of packages.
14 Q I see.
15 Approximately how often would you say you
16 ran into Amber Heard?
17 A Oh, there were a lot of -- a lot of times.
18 I actually off the top of my head I can't say. It
19 was a lot of times.
20 Q When you say "a lot," was it more than
21 50 times?
22 A That's correct.
23 Q More than 100 times?
24 A Probably.
25 Q More than 150?

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1 A Yes.
2 Q So hundreds of interactions with Ms. Heard?
3 A That is correct.
4 Q Were all those interactions in person?
5 A Yes.
6 Q Did you also observe Ms. Heard on the
7 surveillance video?
8 A That's correct.
9 Q Under what circumstances would you observe
10 Ms. Heard on the surveillance video?
11 A Well, actually, like I said, I sit at the
12 desk, I got the cameras and they're just in front of
13 me. I could see everything.
14 Q I see.
15 We actually now have the benefit of some of
16 the security footage from the cameras. I'm going to
17 actually put up a camera so you can talk to us a
18 little bit about the layout of where you were.
19 I would like to use what has previously
20 been marked as 204A, Exhibit 204A.
21 Can you describe the scene in this video,
22 Mr. Romero?
23 A Well, I can see from the camera, the angle
24 of the camera, that is the front desk.
25 Q When you work in the Eastern Columbia

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1 Building, is this desk where you sit?
2 A That's correct.
3 Q Are you always at the desk or do you leave
4 when --
5 A Probably I'm there like 80 percent of the
6 time or 90 percent of the time. I do three patrols
7 a day if there's no one inside the garage, like no
8 trespassers in the garage.
9 Q What are your hours?
10 A I work from 4:00 p.m. to 1:00 a.m.
11 Q The person who is seated at the desk now,
12 do you recognize that person?
13 A I think it's Trinity. I'm pretty sure
14 that's her.
15 Q Who is Trinity?
16 A Trinity, she works for Try Provide. She's
17 the secretary at the --
18 Q When does she work in the building?
19 A She works the mornings.
20 Q When she's there in the mornings, is it
21 your understanding that she's doing the same work
22 that you do in the evenings?
23 A She's more work as a concierge. She takes
24 care of more of the packages.
25 Q I see.

Page 20

1 A There's a lot of packages in the morning.
2 I don't have to deal with packages. Only like when
3 residents ask for a package, I'll go get them. She
4 deals with Fed Ex, UPS, OnTrac, U.S. Postal Service.
5 All the carriers.
6 Q I see.
7 Are there any other distinctions between
8 the work that you perform and the work that
9 Ms. Trinity Esparza performs?
10 A That I think is the only difference. She
11 managed more the moves in the building.
12 Q I see.
13 So when you were discussing monitors for
14 the security cameras, are they located at this front
15 desk?
16 A That's correct.
17 Q Where in the video would they be located?
18 A It's going to be on the right side of
19 Trinity.
20 Q I see.
21 Are you able to view the security footage
22 in real time, or do you go back and look at it
23 later?
24 How does that work?
25 A It's real time.

Page 21

1 Q Do you have the ability to go back and view
2 the footage later?
3 A That's correct.
4 Q Do you recall any circumstances when you've
5 gone back and viewed footage later?
6 A When we find graffiti on the building, when
7 people say they saw someone smoking, when there's an
8 incident, we always go back and try to see who it
9 was and find out.
10 Q Do you recall any times when you went back
11 and viewed footage where you saw Amber Heard?
12 A Not really. Only the time of this
13 incident.
14 Q When you say "this incident," what do you
15 mean?
16 A The incident when they called the cops on
17 the domestic violence.
18 Q Can you tell me what you mean by that?
19 A Well, because there was a rumor that the
20 police arrived and I wanted to see what happened.
21 So when I "record" the camera, I saw the police
22 arriving for the penthouse level. That's why I
23 rewind it. I wanted to see what was going on. But
24 I didn't see anything. There was nothing -- you
25 could only see police getting in and out. That was

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1 it. Because there's no cameras in the hallways.
2 Q I see.
3 So the footage you went back and watched
4 was of the elevator?
5 A That's correct.
6 Q After this incident where the police were
7 called, did you have any personal interactions with
8 Amber Heard?
9 A I saw her probably -- I think that happened
10 on a Saturday. I saw her probably on Monday or
11 Tuesday.
12 Q What do you remember about seeing her on
13 Monday or Tuesday?
14 A Well, I saw her because they were
15 concerned -- they saw some scratches on the door.
16 Q I want to pause.
17 When you say "they were concerned," who are
18 you talking about?
19 A I'm talking about Amber and her friend
20 Rocky.
21 Q Is that Raquel Pennington?
22 A That's correct.
23 Q Is Raquel Pennington a resident as well?
24 A She was a resident there, too.
25 Q Do you recall when it was they were --

Page 23

1 Raquel Pennington and Amber Heard were concerned
2 because they saw scratches on the door?
3 A Because they thought someone was trying to
4 get into the unit.
5 Q Do you recall when that was?
6 A I believe it was on a Monday or a Tuesday.
7 Like I can't remember off the top of my head it was
8 a Monday or a Tuesday.
9 Q Was it the Monday or Tuesday after the
10 police were called?
11 A After. That's correct.
12 Q So walk me through what your interaction
13 with Ms. Heard and Ms. Pennington was like.
14 Did they come to you and ask for your
15 assistance?
16 A That's correct.
17 Q Can you tell us what you remember about
18 that conversation?
19 A Well, they told me that they were afraid
20 of -- someone was trying to break into their unit
21 and they asked me to go and check.
22 And I was talking with Raquel, because I
23 told her her dog was outside and I was thinking the
24 dog did the scratches. The scratches were all the
25 way on the bottom, so I -- and besides, I was at the

Page 24

1 desk and I was looking at the cameras and I didn't
2 see anybody going in.
3 Q I see.
4 So when -- did you talk to Amber Heard in
5 person when this happened?
6 A Yes.
7 Q And this was the Monday or Tuesday after
8 the police were called to the penthouse?
9 A That's correct.
10 Q What did Ms. Heard look like when you
11 talked to her?
12 A What do you mean?
13 Q What was her physical appearance like?
14 A She looked normal to me.
15 Q Normal like --
16 A Like, yeah, she was normal. Like -- like
17 probably you and me right now. It was like nothing.
18 Q As she --
19 A All the times.
20 Q -- was in the hundreds of other times
21 you've seen her?
22 A That's correct.
23 Q Did you see any bruises on her face?
24 A I don't recall seeing any.
25 Q Well, did you physically see her face when

Page 25

1 you were talking with her?
2 A That's correct.
3 Q So how close was she when you were talking
4 to her?
5 A Approximately the same distance you are
6 with me. It was three feet, four feet.
7 Q You had a full shot of her face at the
8 time?
9 A That's correct.
10 Q Were there any bruises on her face?
11 A Not that I remember.
12 Q Well, did you see bruises on her face?
13 A No.
14 Q Did you see cuts on her face?
15 A No.
16 Q Did you see any swelling or marks of any
17 kind on her face?
18 A No.
19 Q Where were you when you were talking to
20 Ms. Heard?
21 A I was at the desk.
22 Q I think you said that they asked you to go
23 somewhere with them.
24 Where did they ask you to go with them?
25 A Penthouse 5.

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1 Q Did you leave the front desk and go to
 2 Penthouse 5 with them?
 3 A That's correct.
 4 Q What was your path from the front desk to
 5 the penthouse?
 6 A Well, like I said, the front, the desk, and
 7 we went to the penthouse level -- I mean to the
 8 penthouse elevator and we took the elevator over to
 9 the penthouse.
 10 Q So in this video, is the penthouse elevator
 11 the one that you see there?
 12 A No.
 13 Q Is the penthouse elevator not visible in
 14 this video?
 15 A That's correct.
 16 Q How many floors up to the penthouse?
 17 A It would be 13 floors.
 18 Q 13 floors.
 19 So you walked to the penthouse elevator
 20 with Ms. Heard and Ms. Pennington; right?
 21 A That's right.
 22 Q What was the lighting like?
 23 A Lighting. It was -- how I explain?
 24 The lighting is normal. We always have the
 25 lights. It's always bright. It's not dark.

Page 27

1 Q So when you were walking with
 2 Ms. Pennington and Ms. Heard to the penthouse
 3 elevator, there was bright light.
 4 Do you see them well?
 5 A Yes.
 6 Q When you got to the elevator, were there
 7 any other people in the elevator?
 8 A No. It was -- there was Rocky, Amber and
 9 me. That's it.
 10 Q Were you standing next to Ms. Heard in the
 11 elevator?
 12 A That's correct.
 13 Q Approximately how far from you was she?
 14 A Like two, three feet.
 15 Q Is there lighting in the elevator?
 16 A That's correct.
 17 Q Is it bright or dim in the elevator?
 18 A It's kind of bright.
 19 Q Could you see Ms. Heard well when you were
 20 in the elevator?
 21 A Yes.
 22 Q Did you have a good visual of her face in
 23 the elevator?
 24 A Yes.
 25 Q Were there any bruises on her face?

Page 28

1 A No.
 2 Q Were there any cuts on her face?
 3 A No.
 4 Q Were there any marks of any kind on her
 5 face?
 6 A No.
 7 Q After you rode up to the penthouse floor,
 8 what did you do next?
 9 A We went and checked and they open the
 10 penthouse number 5 and they asked me to go inside
 11 and check if it was anybody in there. So I went
 12 inside, checked the first level on the penthouse,
 13 went to the second level, there was nothing.
 14 Q Were Ms. Heard and Ms. Pennington walking
 15 around with you in the penthouse?
 16 A That's correct.
 17 Q Approximately how far were they from you
 18 when they were walking with you?
 19 A Probably seven, eight feet, probably,
 20 because it's a real big penthouse and we got
 21 separated inside.
 22 Q Were the lights on in the penthouse?
 23 A No. It was kind of dark.
 24 Q Did Ms. Heard and Ms. Pennington tell you
 25 anything about -- other than the scratches on the

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1 door, about what made them concerned that someone
 2 was in the penthouse?
 3 A They were thinking that maybe Johnny Depp
 4 was trying to get inside that unit, but I don't see
 5 why, because he has a key.
 6 Q I want to back up.
 7 What did they tell you specifically?
 8 A Because she was telling me that she was
 9 having problems and they -- she was afraid of Johnny
 10 trying to get into their unit or Johnny's people
 11 getting into their unit.
 12 Q Who owns Penthouse 5?
 13 A Johnny Depp. He used to own it. Sorry.
 14 Q At that time who owned Penthouse 5?
 15 A Johnny Depp.
 16 Q Had anyone told you prior to this
 17 conversation with Ms. Heard and Ms. Pennington that
 18 Mr. Depp no longer had access to Penthouse 5?
 19 A No.
 20 Q Was there any indication prior to this
 21 conversation that Mr. Depp shouldn't have access to
 22 Penthouse 5?
 23 A No.
 24 Q Was there anything about Ms. Heard's
 25 appearance or demeanor that caused you to be

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1 concerned for her safety at that time?
2 A Not really, because like I said, I sit at
3 the desk and I knew for a fact there was nobody up
4 there.
5 Q But in your interaction with Ms. Heard, was
6 there anything about the way she appeared, the way
7 she looked that caused you concern for her well
8 being?
9 A No.
10 Q You had mentioned that you had heard that
11 the police were called.
12 Did you ever talk with the police?
13 A No.
14 Q Did anyone in the Eastern Columbia Building
15 ever talk with the police?
16 A I don't recall.
17 Q To your knowledge, did anyone?
18 A No. Probably the people that talked to the
19 police, it was someone that was working at that
20 time. I can't remember who it was.
21 Q Did you have any conversations with anyone
22 who worked in the building about the incident with
23 the police being called?
24 A Everybody that works at the desk knew about
25 it.

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1 Q Who are the people that work at the desk?
2 A At that time it was Trinity, Cornelius -- I
3 don't remember who it was. It was me, of course,
4 and -- I can't remember who else was there.
5 Q Okay. Do you recall talking with Trinity
6 and Cornelius about the police being called?
7 A I remember talking with Trinity about it,
8 because I don't see Cornelius because he works -- he
9 used to work on the weekends and I don't work
10 weekends.
11 Q What conversations do you recall having
12 with Trinity about the police being called to the
13 penthouse?
14 A Well, we remember just talking about it,
15 like the incident, everything that we saw on the
16 news. That was it. And like there's pictures and
17 when we went and checked -- there's pictures of a
18 glass of wine or bottle of wine, wine stains on the
19 floor, and we went and checked and there was
20 nothing. It was already cleaned. It was like
21 nothing serious. No damage.
22 Q I want to back you up.
23 You said this conversation you're
24 describing, was this with Ms. Trinity Esparza?
25 A That's correct.

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1 Q When do you recall this conversation taking
2 place?
3 A That was during the week after the police
4 was called.
5 Q You mentioned a photograph of wine.
6 Did you have conversations with Ms. Esparza
7 about anything else related to the police being
8 called?
9 A Well, we only talk about what we heard on
10 the TV.
11 Q What do you recall hearing?
12 A Supposedly I heard that Johnny Depp --
13 first, Johnny Depp punch her on the face, then it
14 was something that Johnny Depp threw a phone to her
15 face.
16 Q What in your conversations with Ms. Esparza
17 did the two of you talk about with regards to the
18 allegations against Mr. Depp?
19 A What was that again? Sorry.
20 Q Sure. That was a bad question. I
21 apologize.
22 When you and Ms. Esparza were talking with
23 each other about the allegations that had been made
24 by Ms. Heard against Mr. Depp, what were you and
25 Ms. Esparza saying?

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1 A We just couldn't believe it. We were going
2 to believe it was -- what happened like doesn't seem
3 like something he will do, like -- because they used
4 to look like really happy couple and that's what we
5 talk. Not much.
6 Q Okay. Was there anything specific that
7 made you disbelieve the allegations against
8 Mr. Depp?
9 Was there something specific that you had
10 seen that made you think that the allegations were
11 untrue?
12 A Well, the only thing we talk about is, how
13 can you be an angry people when you have so much
14 money? So that's what we talk about. That's it.
15 Nothing like -- we just make conversations here and
16 there. Nothing like -- like making a big deal for
17 147 residents that we have, like -- I'm sorry --
18 147 units, we're not going to -- for me, I don't got
19 to focus on one.
20 Q Sure.
21 But you actually saw Ms. Heard in the days
22 following the incident; is that right?
23 A That's correct.
24 Q And was it your understanding that she had
25 claimed that Mr. Depp had punched her or thrown a

Page 34

1 phone at her, I think that's what you testified to?
2 A That's correct.
3 Q Did you see anything on her that indicated
4 to you that she had been punched by anyone?
5 A No.
6 Q Did you see anything on her that indicated
7 to you that she had had a phone or any object thrown
8 at her?
9 A No.
10 Q Was the fact that you did not see any marks
11 on Ms. Heard, was that something that you were
12 relying on when you said you didn't believe the
13 allegations?
14 A No. It was like -- it was like I said, we
15 watched the news and we saw the pictures. And I saw
16 the pictures and the next day I saw her, I was like,
17 come on, really? I couldn't believe it. It was --
18 I saw her in person.
19 Q Okay. Can you unpack that a little bit? I
20 want to make sure I'm following what you're saying.
21 You're saying you saw the pictures in the
22 news and you saw her in person.
23 Can you explain what the difference was
24 between the pictures that you saw on the news and
25 what you saw in person?

Page 35

1 A Okay. The pictures I saw on the news, she
2 got like a big mark on her -- on her eyes and her
3 cheek. And when I saw her in person, I didn't see
4 anything.
5 Q I see. We actually have some security
6 footage from that time period that I want to show
7 you so we can see if it's consistent with what you
8 observed.
9 First of all, what is the date on this
10 security video, the one that's been marked as 204A?
11 A 5-25-16.
12 Q Was that during the time period that you
13 saw Ms. Heard in person?
14 A Probably. I just can't remember the days.
15 I've got a really bad memory for dates.
16 Q I see.
17 I will represent to you that the police
18 were called on May 21st, 2016 and this security
19 footage is from May 25th, 2016, so this is the
20 Wednesday after the Saturday.
21 Is that during the same timeframe that you
22 saw Ms. Heard in person?
23 A That's correct.
24 Q Do you recognize that person?
25 A Yes.

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1 Q Who is that?
2 A That's Amber.
3 Q Let me back up a little bit.
4 I want you to look at her, when she comes
5 in, and tell me whether the way she appears in this
6 video is consistent with the way she looked when you
7 saw her in person.
8 Is that consistent with how Ms. Heard
9 looked when you interacted with her?
10 A Yes.
11 Q In this video, Ms. Heard is giving
12 Ms. Esparza a key. And last week when we took
13 Ms. Esparza's deposition, she testified that
14 Ms. Heard gave her a key to let a housekeeper into
15 the penthouse.
16 In your prior deposition, you testified
17 about Ms. Heard coming back to get a key from you.
18 Do you recall that?
19 A Yes, I do remember.
20 Q Okay. What do you remember about that?
21 A She just got -- because she likes to travel
22 a lot and she leaves the keys for her unit at the
23 front desk. Also, they leave the keys for the
24 housekeeper.
25 Q Can you describe the interaction you had

Page 37

1 with her when she came to pick up the key.
2 A She just asked for the envelope for the
3 key.
4 Q Do you recall what time period that was?
5 A I don't, no.
6 Q I believe you previously testified -- and
7 let me find the date here.
8 I want to hand you a transcript of your
9 prior deposition.
10 Can you take a look at it and please turn
11 to page 18. Around --
12 A Like around 10:30?
13 Q Yes. Keep reading that page. Let me know
14 when you're finished.
15 (Document reviewed by the witness.)
16 BY MS. BILES:
17 Q You can go to the next page.
18 When you finish that page, I'll take it
19 back from you.
20 Thank you.
21 MR. WRENSHALL: Counsel, can I take a look?
22 BY MS. BILES:
23 Q Does that refresh your recollection --
24 A Yes.
25 Q -- about when you had the key interaction

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1 with Ms. Heard?
2 A Yes.
3 Q When did you have the key interaction with
4 Ms. Heard?
5 A It was Wednesday, approximately 10:30 p.m.
6 Q Wednesday of when?
7 A 25th.
8 MR. WRENSHALL: I'm sorry. Can you just
9 tell me what pages?
10 MS. BILES: Page 18.
11 MR. WRENSHALL: Okay.
12 BY MS. BILES:
13 Q Was that May 25th, 2016?
14 A That's right.
15 Q So the day that you interacted with
16 Ms. Heard about the key to her unit is the same day
17 that Ms. Esparza interacted with her in this video?
18 A That's correct.
19 Q So when you say that Ms. Heard looked the
20 same when you interacted with her as she looks in
21 this surveillance video, which we've marked as 204A,
22 is that because you interacted with her the same day
23 that this footage was recorded?
24 A That's correct.
25 Q Okay. I want to back up to -- you were

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1 talking earlier about providing guests access to the
2 building, and if a guest appeared, a resident would
3 tell you to give them access or not; is that right?
4 A That's correct.
5 Q Do you recall any circumstances when you
6 created access to the building for a guest of
7 Ms. Heard?
8 A That's correct.
9 Q What are some of those circumstances that
10 you remember?
11 A I remember she used to call me waiting for
12 a female friend. I can't remember her name. Short
13 hair. I can't remember her name.
14 Q Okay. Do you recall any other guests of
15 Ms. Heard?
16 A There was a gentleman that used to come.
17 Q Do you know who the gentleman was?
18 A Elon Musk.
19 Q What do you recall about Mr. Musk visiting
20 Ms. Heard in the Eastern Columbia Building?
21 A Well, she used to call me telling me her
22 friend was coming and to give him access to the
23 garage and into the building and send him up to the
24 penthouse. And then after probably a couple visits,
25 Amber provided with a garage remote and a fob.

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1 Q When was the first time that Ms. Heard
2 asked you to grant Mr. Elon Musk access to the
3 building?
4 A I don't recall.
5 Q Well, in relation to May of 2016, was it
6 before or after May of 2016?
7 A It was before.
8 Q Was it in 2016?
9 A Yes.
10 Q Do you recall times earlier than 2016?
11 A No.
12 Q Well, let's talk about some specific times
13 where you specifically remember giving Mr. Musk
14 access to the building.
15 What is the first time you remember
16 Ms. Heard asking you to give him access to the
17 building?
18 A I just don't remember the dates or --
19 approximately the time it will be. Most of the
20 times it was late at night.
21 Q When you say "late at night," what do you
22 mean?
23 A Talking about -- sorry.
24 I'm talking about around 11:00 p.m.,
25 midnight.

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1 Q Near the end of your shift?
2 A That's right.
3 Q At those times when Mr. Musk would be
4 granted access at Ms. Heard's request late at night,
5 would Mr. Musk leave while you were still on your
6 shift?
7 A No.
8 Q So when you would leave your shift at
9 1:00 a.m., it was your understanding that Mr. Musk
10 was still in the building?
11 A That's correct.
12 Q Could he have left the building without you
13 knowing?
14 A Yes.
15 Q How would he have been able to leave the
16 building without you knowing?
17 A Because I wouldn't be there.
18 Q But --
19 A If I was there, I probably would know.
20 Q So if he left while you were still working
21 at the front desk and monitoring the security
22 cameras and fobbing people in and out of the
23 building, you would have known?
24 A That's correct.
25 Q When Mr. Musk visited the building, was

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1 Mr. Depp home?
2 A No.
3 Q How frequently did Mr. Musk visit the
4 building?
5 A A few times a week.
6 Q A few times a week.
7 And you said that was before the incident
8 in May of 2016; correct?
9 A That's correct.
10 MS. BILES: I want to go off the record and
11 take a quick break.
12 THE VIDEOGRAPHER: Going off the record at
13 1:31 p.m.
14 (Whereupon, a recess was held
15 from 1:31 p.m. to 1:38 p.m.)
16 THE VIDEOGRAPHER: Going back on the record
17 at 1:38 p.m.
18 BY MS. BILES:
19 Q Mr. Romero, last week when we took
20 Ms. Esparza's deposition, she testified about a
21 conversation that the two of you had last week
22 concerning a visit by Mr. Musk.
23 Do you know which conversation I'm talking
24 about?
25 A Yes, I do.

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1 Q What do you remember about that
2 conversation?
3 What can you tell us about it?
4 A Well, we were talking about -- I think she
5 was texting with someone and she was asking me about
6 Elon Musk.
7 Q When you say "she," who are you talking
8 about?
9 A I'm talking about Trinity.
10 Q So what did you tell Ms. Esparza about Elon
11 Musk?
12 A I told her like -- we were talking about
13 it, about Elon Musk, and I told her it was really
14 bad that I saw Elon Musk going inside the penthouse
15 when Johnny Depp was not home.
16 Q Was there a specific incident where you
17 were talking about where you saw Mr. Depp --
18 Mr. Musk go inside Mr. Depp's penthouse when he
19 wasn't home?
20 A Well, I didn't see him going inside, but I
21 know he went upstairs.
22 Q But was there a specific time when you knew
23 that Mr. Depp wasn't home that you knew Mr. Musk
24 went in?
25 A Yes. Because I believe at that time Johnny

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1 Depp was in the Caribbean filming a movie.
2 Q Is there anything else that you can tell us
3 about when Mr. Musk went to Mr. Depp's penthouse
4 when he was away filming a movie?
5 A I saw him a couple of times, but that's --
6 like I said, we have 147 units. I don't focus on
7 just one. I just remember him going a couple times
8 up there. That's all I do remember.
9 Q But it stood out in your mind that Mr. Musk
10 was going to visit Mr. Depp's penthouse when he was
11 not home; is that right?
12 A That's correct.
13 Q What made it stand out in your mind?
14 A Because I didn't see it right.
15 Q I'm sorry?
16 A I didn't see it right.
17 Q Why did it not seem right?
18 A Because it was late at night.
19 Q How did you know that Mr. Depp was away?
20 A Because I knew someone was personal
21 decorator -- interior decorator for Mr. Depp and we
22 used to talk about it and she told me like that he
23 was going to be in the Caribbean filming a movie for
24 a long time, so that's why I knew he wasn't home.
25 Q When you say "it wasn't right," can you

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1 tell me what you mean by that?
2 A Well, she's a female, he's a male. Both of
3 them by themselves upstairs is -- you know, she's
4 married. I don't know Elon Musk personally. I
5 don't know if he's married or not. I don't know
6 anything about his personal life.
7 Q Can you help us set this in time a little
8 bit more?
9 You mentioned that Mr. Depp was away
10 filming a movie. I think you said in the Caribbean?
11 A I think so, yes.
12 Q Was it "Pirates of the Caribbean"?
13 A That's correct.
14 Q Is there anything else that you remember
15 about the timing of that that would help us know
16 when these visits took place?
17 A That's all I can remember. That's what I
18 emphasize with Trinity. I told her, well, I think
19 it was wrong for Amber having someone else like -- I
20 didn't know if he stayed, but I told her staying the
21 night there. I do remember telling her that, but
22 I'm not 100 percent sure he stayed the night.
23 Q But you do know that he came in late at
24 night while you were on your shift and he had not
25 left by the time you left your shift at 1:00 a.m.?

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1 A That's correct.
2 Q Ms. Esparza testified about something
3 concerning Mr. Depp's finger being injured and
4 you're saying something about his finger being
5 injured in relation to these visits by Mr. Musk.
6 Can you tell us about that.
7 A I remember -- because I think Johnny Depp
8 injured his hand when he was filming the movie and
9 he was going to get surgery on United States, and I
10 was talking to my friend because he likes to play
11 music -- Johnny Depp likes to play music and they
12 were afraid he was not going to be able to play it
13 anymore. That's how I remember the time.
14 Q I see.
15 I just want to make sure I understand the
16 sequence.
17 You heard publicly in the media that
18 Mr. Depp injured his finger while filming a movie;
19 is that right?
20 A That's correct.
21 Q You remember that because you talked to
22 your friend who is a musician about whether Mr. Depp
23 would still be able to play music; is that right?
24 A That's correct.
25 Q So that is how you know what period of time

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1 you're referring to, because you remember having
2 these conversations about Mr. Depp's finger?
3 A That's correct.
4 Q During the same period of time when you
5 were hearing about Mr. Depp's finger and talking
6 about it with your friend, is that the same period
7 of time when you saw Mr. Musk visiting Ms. Heard at
8 the penthouse?
9 A That's correct.
10 Q So is it fair to say if we can figure out
11 when Mr. Depp injured his finger, we can figure out
12 when you saw Mr. Musk visiting the penthouse to see
13 Ms. Heard?
14 A That's correct.
15 Q When these surveillance videos were
16 collected, they were collected by some lawyers who
17 were working on behalf of Mr. Depp.
18 Did you have any interactions with those
19 lawyers?
20 A Not at that time I don't think. I don't
21 think I have -- I saw them in the building, but I
22 didn't have any time to talk to them.
23 Q Do you know who they were?
24 A By this time I couldn't remember.
25 Q Does the name Jake Bloom ring a bell?

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1 A No.
2 Q Bloom Hergott?
3 A Nope.
4 Q I want to show you some other surveillance
5 video because you've talked about the elevator and I
6 just want to see if this video that I have is of the
7 elevator.
8 I'm showing you what has been marked as
9 204C.
10 What is this surveillance video of?
11 A Penthouse elevator.
12 Q What is the date?
13 A 5-25-16.
14 Q What is the time?
15 A 1820.
16 Q What time of day is that?
17 A 6:20.
18 Is it?
19 Q Was this footage taken during a shift you
20 were working at the Eastern Columbia Building?
21 A That's correct.
22 Q So what is it that we're looking at in this
23 video?
24 A Right now it's just the elevator.
25 Q Do you know which elevator it is?

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1 A Penthouse elevator.
2 Q Okay. I want to skip forward and show you.
3 Do the video cameras record continuously?
4 Are they always recording?
5 A They record on motion.
6 Q That's what I was looking for.
7 I believe you're in this video and I want
8 you to confirm that it's you and tell me what you're
9 doing.
10 Is that you?
11 A That's correct.
12 Q What were you doing in this video?
13 A I just was greeting the resident and he
14 went upstairs.
15 Q I see.
16 If you were fobbing somebody up to the
17 penthouse, would you go inside the elevator?
18 How does that work?
19 A There's -- for the penthouse, there's two
20 ways to call the elevator. There's the outside --
21 or the buttons on the outside of the elevator. If
22 you call the penthouse elevator, you can use the
23 fob. Most of the times, probably 90 percent of the
24 times you go inside -- you call the penthouse
25 elevator with a fob, you can actually press

Page 50

1 penthouse. If it doesn't work, you just have to go
2 inside and use the fob inside the elevator.
3 Q I see.
4 When you were giving Mr. Musk access to the
5 penthouse for Ms. Heard, were you fobbing him up to
6 the penthouse; is that what you were doing?
7 A That's correct.
8 Q So you had to physically walk him to the
9 elevator and either call the penthouse elevator from
10 the outside or use the key fob on the inside; is
11 that right?
12 A Correct. That's correct.
13 Q I'm going to ask you if you recognize some
14 particular residents when I get to the right people.
15 A That's the same name. That's Amber.
16 That's another resident.
17 Q That wasn't Amber Heard?
18 A Nope.
19 Q Do you recognize that person?
20 A I have to look at the face.
21 Q Let me see if I can back up. Thanks for
22 your patience. I'm having a little bit of trouble
23 navigating these.
24 She just pressed a button?
25 A She doesn't have a key -- or she didn't use

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1 the key to get the access.
2 Q Where is she trying to go?
3 A Penthouse.
4 Q The penthouse.
5 So this is what would happen if someone
6 didn't have a key, they would just press the buttons
7 and the elevator wouldn't actually go there?
8 A That's correct. But she does have a fob.
9 She just doesn't use the fob at the beginning.
10 Q This video shows her attempting to access
11 the penthouse without the fob, then using the fob?
12 A That's correct.
13 Q Skip ahead.
14 What floor is this?
15 A Penthouse level.
16 Q This is where I want to be.
17 First when the door opens, I want you to
18 tell me if you recognize any of the people.
19 Who is that person?
20 Do you know either of them?
21 A I seen her before, but I don't know the
22 name.
23 Q What about the person standing outside the
24 elevator, who is that?
25 A That's -- that's one of -- one is Amber and

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1 Whitney I believe her name. Amber's sister.
2 Q I see.
3 Who is the person who just got in the
4 elevator, the last one, this woman?
5 A Is it Amber?
6 Q Let me back up.
7 Is that Raquel Pennington?
8 A That's correct. That's Rocky, yep.
9 Q Is that Amber Heard standing outside the
10 elevator?
11 A Yes.
12 Q What does she appear to be doing?
13 A She seems to be eating something.
14 Q You just laughed.
15 Why are you laughing?
16 A She throw something over.
17 Q In the trash or --
18 A No. She just throw something over her
19 shoulder.
20 Q I see.
21 In this surveillance video, do you see any
22 bruises on Ms. Heard's face?
23 A She has like a mark, but I'm not
24 100 percent sure. It could be the light.
25 Q When you interacted with Ms. Heard in

Page 53

1 person, you did not see any bruises or marks on her
2 face; is that right?
3 A That's correct.
4 Q And you interacted with Ms. Heard on
5 May 25th, 2016; is that right?
6 A That's correct.
7 Q This is another video.
8 What is this footage of?
9 A The elevator.
10 Q The elevator to the penthouse?
11 A I need to check.
12 Yes. That's the elevator for the
13 penthouse.
14 Q And what is the date of this?
15 A 5-24-16.
16 Q This is after the incident where the police
17 were called to the penthouse -- strike that.
18 Earlier we discussed that the police were
19 called on May 21st, 2016; is that right?
20 A Correct.
21 Q This is May 24th, 2016?
22 A Correct.
23 Q So it's fair to say this footage was taken
24 after the incident?
25 A Correct.

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1 MR. WRENSHALL: Counsel, what exhibit
2 number is this?
3 MS. BILES: This is 504D.
4 MR. WRENSHALL: 204D?
5 MS. BILES: Yeah. 204D.
6 BY MS. BILES:
7 Q Do you recognize the people getting on the
8 elevator?
9 A Yes.
10 Q Who are they?
11 A That's Amber, Whitney and Rocky.
12 Q Is there a clear shot of Amber's face in
13 this video?
14 A Yes.
15 Q The side of her face?
16 A Yes.
17 Q What side of her face is visible in this
18 video?
19 A That would be the right side.
20 Q In this surveillance video, there are no
21 marks or cuts or bruises on Ms. Heard's face, is
22 there?
23 A That's correct. There's no marks.
24 Q And that's consistent with how she appeared
25 to you in person when you interacted with her?

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1 A That's correct.
2 Q In your hundreds of interactions with
3 Ms. Heard, did you ever see anything that caused you
4 concern about her safety or well being?
5 A No.
6 Q And that "no" includes the period of time
7 that you interacted with her after the incident
8 where she accused Mr. Depp of domestic violence?
9 A That's right.
10 Q In your personal observations of Ms. Heard,
11 did you ever see anything that suggested to you that
12 she had been the victim of any sort of physical
13 assault by anyone?
14 A She doesn't appear.
15 Q I'm sorry?
16 A It didn't look like -- she didn't need any
17 help or she didn't have -- for me, she didn't have
18 to have any concerns.
19 Q Why do you say that?
20 A One, she didn't have any marks. And the
21 other one, she was acting normal, like nothing ever
22 happened.
23 MS. BILES: Let's take a quick break.
24 Off the record.
25 THE VIDEOGRAPHER: Going off record at

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1 1:58 p.m.
2 (Whereupon, a recess was held
3 from 1:58 p.m. to 2:09 p.m.)
4 THE VIDEOGRAPHER: Going back on the record
5 at 2:09 p.m.
6 BY MS. BILES:
7 Q Mr. Romero, earlier you testified today
8 that if we knew when Mr. Depp injured his finger, we
9 would know when Mr. Musk visited Ms. Heard in the
10 penthouse.
11 I will represent to you that Mr. Depp hurt
12 his finger while filming "Pirates of the Caribbean
13 5" in March 2015.
14 Is March 2015 when you personally saw
15 Mr. Musk visit Ms. Heard in the penthouse?
16 A Yes. Because I saw -- I saw -- I saw a
17 picture of Johnny Depp on the boat with something on
18 his hand and I remember I saw Elon that day.
19 Q You saw Mr. Musk the same day that you saw
20 photographs in the news of Mr. Depp with an injured
21 finger?
22 A That's correct.
23 Q So it was March 2015 when Ms. Heard
24 personally asked you to send Mr. Musk up in the
25 elevator to her penthouse?

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1 A That's correct.
2 Q And it was March 2015 when you personally
3 used a key fob to call the penthouse elevator down
4 for Mr. Musk to go up to the penthouse?
5 A That's correct.
6 Q And you were working from 4:00 p.m. until
7 1:00 a.m. in March of 2015?
8 A That's correct.
9 Sorry. I think that day my schedule was
10 different. I think I used to work 4:00 to 2:00.
11 Not 100 percent sure.
12 Q But in any event, your shift ended in the
13 early hours of the morning; is that right?
14 A That's correct.
15 Q So when Ms. Heard was asking for Mr. Musk
16 to be sent up to her penthouse, was it late at night
17 or early in the morning?
18 A It was late at night.
19 Q Late at night.
20 Thank you.
21 MS. BILES: I don't think I have anything
22 further.
23 MR. WRENSHALL: I'm just going to ask a
24 couple questions.
25 Is it easier if I switch?

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1 THE VIDEOGRAPHER: Actually, if you could
2 switch, that would be great. Thank you.
3 (Brief pause.)
4 MR. WRENSHALL: We're back on the record.
5
6 EXAMINATION
7 BY MR. WRENSHALL:
8 Q I just have a few questions for you,
9 Mr. Romero.
10 So Ms. Biles had showed you your previous
11 testimony in the deposition in 2016; is that
12 correct?
13 A That's correct.
14 Q Do you recall testifying about anything in
15 that deposition in addition to what you testified
16 about today?
17 A Something different?
18 Q Anything in addition to?
19 A We're talking today about Elon Musk. At
20 the time it was nothing at all talking about Elon
21 Musk.
22 Q But it was relating to -- did you review
23 video footage at the time?
24 A If I reviewed video footage of Elon Musk
25 going into the building?

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1 Q No. I think you misunderstood.
2 During this deposition, did you review --
3 I'm sorry.
4 During this 2016 deposition, did you review
5 video footage from security cameras in the building?
6 A Actually, I did that on my own. I just
7 checked videos, but nothing like -- nothing like
8 trying to do an investigation or anything. I just
9 rewind, see a couple images, and that's it. There's
10 not much to see in the videos.
11 Q So did you testify previously about
12 Ms. Heard's appearance after the incident?
13 A That's correct.
14 Q And that was in the deposition in 2016; is
15 that correct?
16 A That's correct.
17 Q And you've also testified earlier today
18 that you had not met with any attorneys of Mr. Depp
19 after the incident; is that correct?
20 A That's correct.
21 Q And you never met Mr. Jake Bloom; is that
22 correct?
23 A That's correct. If I do, I don't remember.
24 MR. WRENSHALL: I think those are all the
25 questions I have.

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1 MS. BILES: Okay. Same stipulation?
2 MR. WRENSHALL: I agree.
3 THE VIDEOGRAPHER: We're off the record at
4 2:14 p.m. This concludes today's testimony given by
5 Alejandro Romero. The total number of media used
6 was one and will be retained by Veritext Legal
7 Solutions. Thank you.
8 MR. WRENSHALL: I'll get a rough as soon as
9 you have it ready.
10 MS. BILES: We will, too.
11 (The following stipulation is incorporated
12 hereto from the deposition of Trinity Corrine
13 Esparza, taken on January 25, 2019:
14 "MS. BILES: I offer the
15 following stipulation for the
16 record:
17 "That the court reporter be
18 relieved of responsibility with
19 respect to the original
20 transcript. The original
21 transcript will be transcribed
22 and signed by you under penalty
23 of perjury. The court reporter
24 is going to send you a copy of
25 the deposition transcript.


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1 Should we send it to your
2 home address?
3 "Once you receive the
4 transcript, is two weeks enough
5 time for you to read it and make
6 any corrections, if necessary?
7 "THE WITNESS: Yes.
8 "MS. BILES: We'll go ahead
9 and send that. Once you receive
10 the transcript from the court
11 reporter, you'll have two weeks
12 to review it, make any
13 corrections if you think they are
14 necessary, and you'll sign it.
15 You will send it back to Brown
16 Rudnick's office in Irvine,
17 California. E-mail is fine.
18 "If we're not notified of any
19 changes within the two weeks, the
20 original will be deemed correct
21 and signed.
22 And the original transcript
23 will be maintained by Brown
24 Rudnick in Irvine, California and
25 make it available at the time of

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1 any hearing in this matter.
 2 "If the original transcript
 3 is not available, a certified
 4 copy of the same as corrected can
 5 be used for all purposes for
 6 which the original could be used.
 7 "So stipulated?
 8 "MR. WRENSHALL: So
 9 stipulated."
 10
 11 (Whereupon the deposition proceedings
 12 were concluded at 2:14 p.m.)
 13
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1 STATE OF CALIFORNIA)
 2 COUNTY OF LOS ANGELES) ss.
 3
 4 I, D'Anne Moungey, C.S.R. No. 7872 in and
 5 for the State of California, do hereby certify:
 6 That prior to being examined, the witness
 7 named in the foregoing deposition was by me duly
 8 sworn to testify to the truth, the whole truth, and
 9 nothing but the truth;
 10 That said deposition was taken down by me
 11 in shorthand at the time and place therein named and
 12 thereafter reduced to typewriting under my
 13 direction, and the same is a true, correct, and
 14 complete transcript of said proceedings;
 15 That if the foregoing pertains to the
 16 original transcript of a deposition in a Federal
 17 Case, before completion of the proceedings, review
 18 of the transcript { } was { } was not required.
 19 I further certify that I am not interested
 20 in the event of the action.
 21 Witness my hand this 7th day of January, 2019.
 22
 23
 24 
 25 Certified Shorthand Reporter
 For the State of California

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1 ACKNOWLEDGMENT OF DEPONENT
 2 I, ALEJANDRO ROMERO, do hereby certify
 3 that I have read the foregoing transcript of my
 4 testimony taken on 1/30/19, and further certify
 5 that it is a true and accurate record of my
 6 testimony (with the exception of the corrections
 7 listed below):
 8 Page Line Correction
 9 _____
 10 _____
 11 _____
 12 _____
 13 _____
 14 _____
 15 _____
 16 _____
 17 _____
 18 _____
 19 _____
 20 _____
 21
 22 Signed under the pains and penalties of perjury
 23 this ____ day of _____, 20 ____.
 24
 25 _____
 ALEJANDRO ROMERO

25

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