

Debra Lloyd
Proffer Exhibit F
Depp v. Heard
CL-2019-0002911

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MAY 23 2022

JOHN T. FREY
Clerk of the Circuit Court
of Fairfax County, VA



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ORDER**

Transcript of Debra Lloyd, APRN

Date: March 8, 2022
Case: Depp, II -v- Heard

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WORLDWIDE COURT REPORTING & LITIGATION TECHNOLOGY

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<p>1 VIRGINIA: 2 IN THE CIRCUIT COURT FOR FAIRFAX COUNTY 3 4 ----- x 5 JOHN C. DEPP, II, : 6 Plaintiff, : Case No. 7 v. : CL-2019-0002911 8 AMBER LAURA HEARD, : 9 Defendant. : 10 ----- x 11 THIS TRANSCRIPT HAS BEEN MARKED CONFIDENTIAL 12 PURSUANT TO THE PROTECTIVE ORDER 13 ***** 14 15 Videotaped Deposition of DEBRA LLOYD, APRN 16 Conducted Remotely via Zoom 17 Tuesday, March 8, 2022 18 12:03 p.m. 19 20 Job No.: 436564 21 Pages: 1 - 301 22 Reported By: AMY L. STRYKER, CCR</p>	<p>1 A P P E A R A N C E S 2 3 ON BEHALF OF PLAINTIFF JOHN C. DEPP, II: 4 JESSICA N. MEYERS, ESQ. 5 BROWN RUDNICK LLP 6 7 Times Square 7 New York, New York 10036 8 (212) 209-4800 9 and 10 BENJAMIN G. CHEW, ESQ. 11 BROWN RUDNICK LLP 12 601 Thirteenth Street, NW 13 Suite 600 14 Washington, D.C. 20005 15 (202) 536-1785 16 and 17 CAMILLE M. VASQUEZ, ESQ. 18 BROWN RUDNICK LLP 19 2211 Michelson Drive 20 Irvine, California 92612 21 (949) 752-7100 22</p>
<p>1 Deposition of DEBRA LLOYD, APRN, conducted 2 remotely. 3 4 Pursuant to subpoena, before AMY L. 5 STRYKER, Certified Court Reporter and Notary 6 Public of the State of Maryland. 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22</p>	<p>1 A P P E A R A N C E S C O N T I N U E D 2 3 ON BEHALF OF PLAINTIFF JOHN C. DEPP, II: 4 KATHLEEN T. ZELLNER, ESQ. 5 LAW OFFICES OF KATHLEEN T. ZELLNER & 6 ASSOCIATES 7 1901 Butterfield Road, Suite 650 8 Downers Grove, Illinois 60515 9 (630) 955-1111 10 11 ON BEHALF OF DEFENDANT AMBER LAURA HEARD: 12 ADAM NADELHAFT, ESQ. 13 CLARISSA K. PINTADO, ESQ. 14 CHARLSON BREDEHOFT COHEN BROWN 15 & NADELHAFT, P.C. 16 11260 Roger Bacon Drive 17 Suite 201 18 Reston, Virginia 20190 19 (703) 318-6800 20 21 22</p>

Conducted on March 8, 2022

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<p>1 PROCEEDINGS 2 THE VIDEOGRAPHER: Here begins the 3 videotaped deposition of Debbie Lloyd in the 4 matter of Depp, II vs. Heard, in the Circuit Court 5 of Fairfax County, Virginia, Case No. 6 CL-2019-0002911. 7 Today's date is Tuesday, March 8, 2022. 8 The time on the monitor is 12:03 p.m. Eastern 9 Time. Your videographer today is Brendan Case, 10 representing Planet Depos. This video deposition 11 is taking place remotely via Zoom video 12 teleconference. 13 Would all counsel present please identify 14 themselves and state whom they represent. 15 MR. NADELHAFT: Adam Nadelhaft and 16 Clarissa Pintado for Amber Heard. 17 MS. MEYERS: Jessica Meyers and Benjamin 18 Chew for Mr. Depp. 19 MS. HICKOX: Cindy Hickox on behalf of the 20 deponent, Debbie Lloyd. 21 THE VIDEOGRAPHER: Your reporter today is 22 Amy Stryker, representing Planet Depos.</p>	<p>10</p>	<p>1 A No. 2 Q So I'm just going to give you some kind of 3 basic ground rules so it will hopefully work well 4 today. 5 I'm going to start off asking questions -- 6 asking the questions. Please, if you can wait for 7 my question to finish before answering, I'm going 8 to do my best to wait for you to finish your 9 answer before asking the next question. That way 10 we're not speaking over each other. Does that 11 make sense? 12 A Yup. 13 Q If, at any time, you don't understand a 14 question of mine, please let me know and I'll try 15 to rephrase the question. Okay? Does that make 16 sense? 17 A Yes. 18 Q All right. Given that we're on Zoom, if 19 you don't hear me, please let me know and I'll try 20 to speak up. Does that make sense? 21 A Yes. 22 Q And as you're doing, to the extent you</p>	<p>12</p>

<p style="text-align: right;">13</p> <p>1 can, please answer with words as opposed to 2 "uh-huh"s or "uh-uh"s so that we all know what you 3 mean. Does that make sense? 4 A Yes. 5 Q All right. And if you answer my question, 6 it will be assumed that you understood the 7 question and heard the question. Does that make 8 sense? 9 A Yes. 10 Q All right. There also may be objections 11 throughout the deposition. Ms. Meyers may be 12 objecting at certain times, your attorney may be 13 objecting at certain times. Unless your attorney 14 tells you not to answer the question, just for the 15 record, if you can, answer the question, but I'll 16 let your attorney instruct you as to how to 17 proceed. Does that make sense? 18 A Yes. 19 Q And if, at any time -- you know, we'll 20 probably be taking -- we'll be taking breaks, I'm 21 sure, throughout, but if, at any time, you need to 22 take a break, just let me know and we'll give you</p>	<p style="text-align: right;">15</p> <p>1 share any information that I communicated to you 2 at any point during my representation of you. 3 Okay? 4 THE WITNESS: Okay. 5 BY MR. NADELHAFT: 6 Q And I'm not going to be asking you about 7 any communications you had with your attorneys. 8 But that -- but be careful about that. You know, 9 it's just a privilege issue. 10 Have you, at any time, spoken with 11 Mr. Depp or any of his counsel, either in 12 preparation for this deposition or for any other 13 matter, after you no longer worked with Mr. Depp? 14 A Yes. 15 Q Do you recall who you spoke to? 16 A I believe her name was Camille. 17 Q And do you recall when you spoke to 18 Camille, approximately? 19 A Two weeks ago. 20 Q And what -- what did Camille and you 21 discuss? 22 A She had asked me if Johnny had ever thrown</p>
<p style="text-align: right;">14</p> <p>1 a break. I just ask that as long as you answer 2 the question that's pending, and then we can take 3 the break. Okay? 4 A Okay. 5 Q Okay, great. 6 Did you review any documents in 7 preparation for your deposition today? 8 A No. My notes were sent to me, but I chose 9 not to look at them. 10 Q Fair enough. 11 Who sent you your notes? 12 A I don't remember if it was -- was it my 13 attorney? 14 THE WITNESS: Did you send them to me, 15 Cindy? 16 MS. HICKOX: You can answer, if you know. 17 If you don't know, you can say you don't know. 18 THE WITNESS: I don't -- I don't know. I 19 know Cindy told me they would be coming. 20 MS. HICKOX: Hold on. Hold on. Hold on. 21 Q Okay. Yeah, don't talk about anything -- 22 MS. HICKOX: It's important that you don't</p>	<p style="text-align: right;">16</p> <p>1 anything at me. 2 Q And what did you say? 3 A No. 4 Q Were there any other -- was that the total 5 of your communications with Camille? 6 A That was the only time that I remember 7 speaking to her. 8 Q And did you speak about anything else 9 other than whether -- 10 And when you say "Johnny," I assume you 11 mean Mr. Depp, correct? 12 A Yes. 13 Q Did you have any other -- did you discuss 14 anything else other than whether Mr. Depp had 15 thrown something at you? 16 A They had asked if I would be willing to go 17 to Virginia to the trial. 18 Q And are you willing to go to Virginia to 19 be a trial witness? 20 A No. 21 Q Did you -- at any time did you speak -- 22 did you have any other -- do you recall anything</p>

<p style="text-align: right;">17</p> <p>1 else you and Camille spoke about?</p> <p>2 A Not in detail.</p> <p>3 Q Do you know how long the conversation was,</p> <p>4 approximately?</p> <p>5 A Approximately 15 minutes.</p> <p>6 Q Was it over the phone?</p> <p>7 A Yes.</p> <p>8 Q Do you recall at any other time having any</p> <p>9 other communications with any other counsel for</p> <p>10 Mr. Depp?</p> <p>11 A No. There was somebody else on that call,</p> <p>12 I believe, from his side, but I don't know who it</p> <p>13 was.</p> <p>14 Q Do you recall if it was a man or a woman?</p> <p>15 A A man.</p> <p>16 Q Do you -- did you ever speak to Adam</p> <p>17 Waldman?</p> <p>18 A I know an Adam reached out to me a long</p> <p>19 time ago. I don't remember a last name.</p> <p>20 Q And do you recall -- and was this Adam</p> <p>21 representing Mr. Depp?</p> <p>22 MS. HICKOX: Objection; calls for</p>	<p style="text-align: right;">19</p> <p>1 part of the record.)</p> <p>2 THE WITNESS: I do not recall.</p> <p>3 BY MR. NADELHAFT:</p> <p>4 Q And do you recall if the communication</p> <p>5 with Adam was verbal or was it a written</p> <p>6 communication?</p> <p>7 MS. MEYERS: Objection; compound.</p> <p>8 MS. HICKOX: Join.</p> <p>9 You can answer.</p> <p>10 THE WITNESS: Verbal.</p> <p>11 Q So Adam called you on the phone?</p> <p>12 A Yes.</p> <p>13 Q Okay. And do you recall if anyone ever</p> <p>14 asked you to sign a declaration on behalf of</p> <p>15 Mr. Depp?</p> <p>16 A I do not recall.</p> <p>17 Q Okay. And do you recall anything else</p> <p>18 from that conversation with Adam?</p> <p>19 A No.</p> <p>20 Q Do you recall any other communications</p> <p>21 with any other counsel for Mr. Depp?</p> <p>22 A I don't recall any.</p>
<p style="text-align: right;">18</p> <p>1 speculation.</p> <p>2 If you know, you know. If you don't know,</p> <p>3 you don't know.</p> <p>4 THE WITNESS: I don't remember.</p> <p>5 BY MR. NADELHAFT:</p> <p>6 Q Do you recall what Adam was asking you</p> <p>7 about?</p> <p>8 MS. MEYERS: Objection; calls for hearsay.</p> <p>9 MS. HICKOX: Join.</p> <p>10 Q And this is one of the instances where,</p> <p>11 unless your counsel's telling you not to answer,</p> <p>12 you can answer the question.</p> <p>13 MS. HICKOX: You can go ahead and answer</p> <p>14 if you understand the question, if -- and if you</p> <p>15 remember.</p> <p>16 THE WITNESS: I'm -- can you repeat the</p> <p>17 question. I'm sorry.</p> <p>18 Q Sure. Do you recall what Adam was</p> <p>19 looking -- I'm sorry.</p> <p>20 MR. NADELHAFT: Amy, can you just repeat</p> <p>21 the question.</p> <p>22 (The court reporter read the pertinent</p>	<p style="text-align: right;">20</p> <p>1 Q You understand that in 2016 Amber Heard</p> <p>2 filed for divorce from Mr. Depp, correct?</p> <p>3 MS. HICKOX: Objection; calls for</p> <p>4 speculation, assumes facts not in evidence.</p> <p>5 You can answer, if you know.</p> <p>6 THE WITNESS: I don't remember when. I</p> <p>7 just remember hearing on the news that she had</p> <p>8 filed -- or People magazine, I think, that she had</p> <p>9 filed.</p> <p>10 Q Okay. Did you have any communications</p> <p>11 with Mr. Depp after Amber filed for divorce?</p> <p>12 A I don't believe so.</p> <p>13 Q Okay. Do you recall when the last time</p> <p>14 you communicated with Mr. Depp is?</p> <p>15 (Ms. Zellner has joined the deposition.)</p> <p>16 Q You can answer. That's one of Mr. Depp's</p> <p>17 lawyers who was joining.</p> <p>18 A Okay. I don't -- I don't remember our</p> <p>19 last communication.</p> <p>20 MR. NADELHAFT: And it looks like Kathleen</p> <p>21 Zellner just entered the deposition on behalf of</p> <p>22 Mr. Depp.</p>

<p style="text-align: right;">21</p> <p>1 Q Okay. I'm just going to go into a little 2 bit of your background. Okay? 3 A Uh-huh. 4 Q You are a psychiatric mental health nurse 5 practitioner? 6 A Yes. 7 Q Can you briefly explain what that is. 8 A I'm a nurse practitioner that specializes 9 in psych- -- psychiatry. 10 Q And did you go to -- where did you go to 11 school for that? 12 A I got my master's from Maryville 13 University. 14 Q Is that in California? 15 A It's in Illinois. 16 Q And -- 17 A No, it's not. It's in Missouri. 18 St. Louis, Missouri. Sorry. 19 Q No problem. 20 And I understand you're also a certified 21 addiction nurse. 22 A Yes.</p>	<p style="text-align: right;">23</p> <p>1 Q And would you at times provide 24/7 2 nursing care? 3 A Yes. 4 Q Okay. And you'd also be a patient's 5 travel companion for nursing care? 6 A Yes. 7 Q Did you sometimes call that a sober 8 companion? 9 A No. 10 Q Okay. 11 A There are sober companions, and I would 12 send some with clients, but I myself was never a 13 sober companion. 14 Q What is a sober companion? 15 A Somebody who has at least five years of 16 sobriety and that's been through the program. 17 Q So the sober companion is not necessarily 18 a nurse. 19 A No. 20 Q It would -- right. Okay. 21 It would be like a mentor or something 22 that's in, like -- that sort of thing, correct?</p>
<p style="text-align: right;">22</p> <p>1 Q And can you briefly explain what that is. 2 A I had to get a certification in addiction 3 nursing. 4 Q And what is addiction nursing? 5 A Nursing that specializes in taking care of 6 patients with chemical dependency issues. 7 Q And chemical dependency, that's drugs and 8 alcohol? 9 A Yes. 10 Q And how long have you worked in those 11 fields, addiction nursing and mental health 12 nurs- -- nursing? 13 A Since 2004. 14 Q And would you agree that one of your 15 specialty services is concierge addiction 16 services? 17 A It was, yes. 18 Q What are concierge addiction services? 19 A We would -- that's a good question -- 20 mainly deal with higher -- higher-end clients and 21 provide care -- go to their home rather than have 22 them come into facilities.</p>	<p style="text-align: right;">24</p> <p>1 A Yes. 2 Q And you owned your own company? 3 A Yes. 4 Q And what was the company's name? 5 A Turning Point. 6 Q Do you still own Turning Point? 7 A Yes. 8 Q And what does Turning Point do? 9 A Provides services -- it's actually no 10 longer. I still own it, but we don't -- I don't 11 work with it anymore. 12 It provides services to -- either nursing 13 or sober companion services to patients. 14 Q And when did you start Turning Point? 15 A I don't recall the exact year. 16 Q Does anyone else own it? 17 A No. 18 Q How many people work at Turning Point? 19 A I'm the -- the only employee. 20 Q And what do you have, contract nurses who 21 work for you? 22 A I did, yes.</p>

<p>25</p> <p>1 Q And what does Turning Point do now, if 2 anything?</p> <p>3 A Sits dormant.</p> <p>4 Q And when did it start to sit dormant?</p> <p>5 A About two years ago.</p> <p>6 Q Is there any particular reason why?</p> <p>7 A That's when I became a nurse practitioner 8 and changed my career path.</p> <p>9 Q And where do you work now?</p> <p>10 A I work for Headlands Addiction Treatment 11 Services.</p> <p>12 Q And what do you do there?</p> <p>13 A Nurse practitioner.</p> <p>14 Q Is there a difference between a nurse 15 practitioner and a nurse?</p> <p>16 A A nurse practitioner -- I can diagnose and 17 prescribe medications underneath a doctor's 18 supervision.</p> <p>19 Q So when you were working at Turning 20 Point -- or when you owned -- when you were 21 working at Turning Point, were you a nurse 22 practitioner?</p>	<p>27</p> <p>1 Q Okay. And we can -- we can look at some 2 documents and that may help.</p> <p>3 Do you know how many patients you had 4 worked with with Dr. Kipper before working with 5 Mr. Depp?</p> <p>6 A That would be a guesstimate.</p> <p>7 Q Okay. Do you have any approximation?</p> <p>8 A 20.</p> <p>9 Q And when Dr. Kipper reached out to you 10 about Mr. Depp, did he reach out to you by phone 11 or by written communication?</p> <p>12 A By phone.</p> <p>13 Q Do you recall what Dr. Kipper told you he 14 was looking for in regards to Mr. Depp's care?</p> <p>15 A Detox.</p> <p>16 Q And detox from what?</p> <p>17 A Originally, I don't think I knew any of 18 the specifics.</p> <p>19 Q What did you come to understand Mr. Depp 20 was looking to detox from?</p> <p>21 A Opiates.</p> <p>22 Q Any other medication or any other drugs</p>
<p>26</p> <p>1 A No.</p> <p>2 Q What was your title then?</p> <p>3 A Registered nurse.</p> <p>4 Q And you -- you performed work for 5 Mr. Depp, correct?</p> <p>6 A Yes.</p> <p>7 Q Was that with Turning Point?</p> <p>8 A Turning Point was contracted through 9 Dr. Kipper.</p> <p>10 Q Can you explain how that arose, how you 11 began to work for Mr. Depp through Dr. Kipper.</p> <p>12 A Dr. Kipper was his doctor and he needed 13 nursing services, so Dr. Kipper reached out to me.</p> <p>14 Q And it's Dr. David Kipper, correct?</p> <p>15 A Correct.</p> <p>16 Q Had you worked with Dr. Kipper before 17 working with Mr. Depp?</p> <p>18 A Yes.</p> <p>19 Q Do you know when you started working for 20 Mr. Depp, approximately?</p> <p>21 A Approximately -- I think it was 2015 or 22 '16.</p>	<p>28</p> <p>1 that Mr. Depp was looking to detox from?</p> <p>2 A Not that I recall.</p> <p>3 Q Do you know if Mr. Depp ever took cocaine?</p> <p>4 MS. HICKOX: Objection; calls for 5 speculation, calls for hearsay, assumes facts not 6 in evidence.</p> <p>7 You can answer, if you know.</p> <p>8 MS. MEYERS: Join.</p> <p>9 THE WITNESS: I never witnessed him use 10 any cocaine.</p> <p>11 Q Okay. Did anyone ever tell you that 12 Mr. Depp had used cocaine?</p> <p>13 MS. MEYERS: Objection.</p> <p>14 MS. HICKOX: Objection.</p> <p>15 MS. MEYERS: Yeah, objection; calls for 16 hearsay.</p> <p>17 Go ahead.</p> <p>18 THE WITNESS: I don't recall.</p> <p>19 Q So did Dr. Kipper contract with your 20 company for the care for Mr. Depp?</p> <p>21 A I don't recall the specifics of how we 22 were brought on.</p>

<p style="text-align: right;">29</p> <p>1 Q Okay. How were you -- how were you paid?</p> <p>2 A Through Dr. Kipper.</p> <p>3 Q So Mr. Depp would pay Dr. Kipper, and then</p> <p>4 Dr. Kipper would give a certain amount of money to</p> <p>5 you?</p> <p>6 A I believe --</p> <p>7 MS. HICKOX: Objection; calls for</p> <p>8 speculation, vague, compound.</p> <p>9 MS. MEYERS: Join.</p> <p>10 MS. HICKOX: I'm sorry, did you provide an</p> <p>11 answer? I'm not sure if I heard one.</p> <p>12 MR. NADELHAFT: Let me ask it again.</p> <p>13 Q You understood that Mr. Depp paid</p> <p>14 Dr. Kipper for your services?</p> <p>15 MS. HICKOX: Same objections.</p> <p>16 MS. MEYERS: Join.</p> <p>17 Q You can answer.</p> <p>18 A I know I was paid by Dr. Kipper. I'm -- I</p> <p>19 don't know who paid Dr. Kipper.</p> <p>20 Q Okay. Did you have to submit your time to</p> <p>21 Dr. Kipper --</p> <p>22 A Yes.</p>	<p style="text-align: right;">31</p> <p>1 speculation, calls for hearsay, assumes facts,</p> <p>2 vague.</p> <p>3 MS. MEYERS: Join.</p> <p>4 BY MR. NADELHAFT:</p> <p>5 Q You can answer that.</p> <p>6 A I don't know why. I believed it was a --</p> <p>7 for a thank-you.</p> <p>8 Q And the same, you believed it was a thank-</p> <p>9 you with the fancy notepad that you received?</p> <p>10 A It was at the same time.</p> <p>11 Q Did you receive anything else ever from</p> <p>12 Mr. Depp?</p> <p>13 A Not that I recall.</p> <p>14 Q Okay. Do you -- do you still do work for</p> <p>15 Dr. Kipper?</p> <p>16 A I have not recently.</p> <p>17 Q Do you recall when you last worked with</p> <p>18 Dr. Kipper?</p> <p>19 A Not exactly.</p> <p>20 Q Do you remember the year you stopped</p> <p>21 working with Dr. Kipper?</p> <p>22 A No.</p>
<p style="text-align: right;">30</p> <p>1 Q -- for Mr. Depp's services? Okay.</p> <p>2 MS. HICKOX: Debbie, I'm just going to</p> <p>3 remind you: Wait until he finishes his full</p> <p>4 question before providing a response. It kind of</p> <p>5 cuts off the question, and you may be answering</p> <p>6 something that he's not asking. So just pause for</p> <p>7 a second. Okay?</p> <p>8 THE WITNESS: Thank you.</p> <p>9 Q And that was a little unfair on my end; I</p> <p>10 paused, so I added a little something. So I</p> <p>11 apologize for that, Ms. Lloyd.</p> <p>12 Did Mr. Depp ever pay you directly?</p> <p>13 A No.</p> <p>14 Q Did you ever get any gifts from Mr. Depp?</p> <p>15 A Yes.</p> <p>16 Q What gifts did you receive from Mr. Depp?</p> <p>17 A I remember getting a jewelry box and a --</p> <p>18 I forget what it's called. Like a notepad, a</p> <p>19 fancy notepad, I guess.</p> <p>20 Q Was -- do you recall why he -- Mr. Depp</p> <p>21 gave you the jewelry box?</p> <p>22 MS. HICKOX: Objection; calls for</p>	<p style="text-align: right;">32</p> <p>1 Q Okay. Do you recall the last time you</p> <p>2 have spoken to Dr. Kipper?</p> <p>3 A This week, last week.</p> <p>4 Q What did you talk to Dr. Kipper about this</p> <p>5 week?</p> <p>6 MS. MEYERS: Objection; calls for hearsay.</p> <p>7 Debbie, go ahead.</p> <p>8 Q Go ahead.</p> <p>9 A He's my personal doctor.</p> <p>10 Q Okay. So did you speak to Dr. Kipper at</p> <p>11 all about this case?</p> <p>12 A No.</p> <p>13 Q Have you ever spoken to Dr. Kipper at all</p> <p>14 about this case?</p> <p>15 MS. HICKOX: Objection; vague as to "this</p> <p>16 case."</p> <p>17 You can answer, if you understand.</p> <p>18 THE WITNESS: Can you -- yeah, can you</p> <p>19 clarify what you mean by "this case."</p> <p>20 Q Have you ever spoken to Dr. Kipper about</p> <p>21 your deposition?</p> <p>22 A No.</p>

<p style="text-align: right;">33</p> <p>1 Q Have you ever spoken to Dr. Kipper about 2 his deposition? 3 A Yes. 4 Q What did you and Dr. Kipper talk about 5 about his deposition? 6 MS. MEYERS: Objection; calls for hearsay. 7 MS. HICKOX: Join. 8 Q You can answer. 9 A He told me it was nine hours, after. 10 Q And did Dr. Kipper go into any 11 substance -- 12 A No. 13 Q -- of what was asked during the 14 deposition? 15 A No. 16 Q Okay. Do you recall if there was any 17 other -- you spoke about anything else regarding 18 Dr. Kipper's deposition? 19 A Not that I recall. 20 Q Did Dr. Kipper reach out to you about 21 Dr. Kipper's deposition or did you reach out to 22 him?</p>	<p style="text-align: right;">35</p> <p>1 A I'm pausing because I don't know how to 2 answer. Erin worked for me before this case, so 3 she wasn't hired by Turning Point specifically for 4 this case. 5 Q Okay. Was Erin -- was Ms. Boerum a 6 salaried employee of Turning Point? 7 A No. 8 Q So Ms. Boerum was a contract attorney -- 9 contract employee for Turning Point, correct? 10 A Correct. 11 Q So how would -- in kind of a general 12 sense, how did that -- how did that work with 13 Ms. Boerum and Turning Point? 14 MS. MEYERS: Objection; vague. 15 Q If you needed her for a particular case, 16 you'd hire her for that case? 17 A Yes. 18 Q Okay. And your testimony is that you had 19 hired Ms. Boerum previously for other patients, is 20 that right, before Mr. Depp and Ms. Heard? 21 A Yes. 22 Q Okay. And do you recall how Ms. Boerum</p>
<p style="text-align: right;">34</p> <p>1 A I don't recall. 2 Q Okay. Have you spoken to anyone else 3 about depositions that have been taken in this 4 case? 5 A No. 6 Q Did you ever speak to Erin Boerum about 7 her deposition? 8 A No. 9 Q And you know who Erin Boerum is, correct? 10 A Yes. 11 Q And who is she? 12 A She's a nurse that worked with us. 13 Q And Ms. Boerum worked for Turning Point; 14 is that right? 15 A Yes. 16 Q And she -- and did you hire Ms. Boerum? 17 A Yes. 18 Q And did you hire Ms. Boerum for the care 19 of Mr. Depp or -- or Ms. Heard? 20 MS. MEYERS: Objection; compound. 21 Q Let me ask it again. Did you hire 22 Ms. Boerum for the care of Mr. Depp?</p>	<p style="text-align: right;">36</p> <p>1 came to work for Mr. Depp and Ms. Heard? 2 MS. HICKOX: Objection; vague, calls for 3 speculation and calls for hearsay. 4 Go ahead. 5 MS. MEYERS: Objection; assumes facts not 6 in evidence. And I also join in the other 7 objections. 8 Go ahead. 9 Q You can answer. 10 A Can you repeat, please. 11 Q Sure. How did -- 12 MR. NADELHAFT: Well, Amy, can you read it 13 back. 14 (The court reporter read the pertinent 15 part of the record.) 16 THE WITNESS: Yes. 17 Q How did that happen? What happened? 18 A I was taking care of Johnny, and Amber -- 19 it was decided that Amber needed some support, so 20 I brought her in for Amber. 21 Q So were you Mr. Depp's primary nurse? 22 A Yes.</p>

<p style="text-align: right;">37</p> <p>1 Q And was Ms. Boerum Amber's primary nurse?</p> <p>2 A Yes.</p> <p>3 Q And would you ever share responsibilities</p> <p>4 where Ms. Boerum would perform nursing care for</p> <p>5 Mr. Depp and you'd perform nursing care for Amber?</p> <p>6 MS. MEYERS: Objection; form, compound.</p> <p>7 MS. HICKOX: Join. Also calls for</p> <p>8 speculation, vague.</p> <p>9 Q You can answer.</p> <p>10 A I know Erin covered for me a few times. I</p> <p>11 do not believe I ever cared for Amber.</p> <p>12 Q And you said that a decision was made that</p> <p>13 Amber needed nursing care?</p> <p>14 A Yes.</p> <p>15 Q Who made that decision?</p> <p>16 A I don't recall.</p> <p>17 Q Did you ever communicate with any of the</p> <p>18 psychologists or psychiatrists who were working</p> <p>19 with Mr. Depp?</p> <p>20 A I don't recall.</p> <p>21 Q Did you ever communicate with Alan</p> <p>22 Blaustein?</p>	<p style="text-align: right;">39</p> <p>1 MR. NADELHAFT: And let's make it a little</p> <p>2 bit bigger.</p> <p>3 BY MR. NADELHAFT:</p> <p>4 Q Ms. Lloyd, I'm showing you what's been</p> <p>5 marked as Lloyd Exhibit 1. You'll see it's many</p> <p>6 pages. And we're going to go through some of</p> <p>7 these during the day. But just looking at it, do</p> <p>8 you recognize what this is?</p> <p>9 A Yes.</p> <p>10 Q And what is Lloyd Exhibit 1?</p> <p>11 A My nursing notes.</p> <p>12 Q Okay. So these are notes that you</p> <p>13 created?</p> <p>14 A Yes.</p> <p>15 Q And these are notes you created for your</p> <p>16 care of Mr. Depp; is that right?</p> <p>17 A Correct.</p> <p>18 MS. HICKOX: I'm just going to lodge a</p> <p>19 belated objection that this potentially violates</p> <p>20 the best evidence rule, potentially vague. She</p> <p>21 hasn't reviewed the entire document. I see that</p> <p>22 it's 123 pages. So these are just responses based</p>
<p style="text-align: right;">38</p> <p>1 A I don't recall.</p> <p>2 Q Did you ever work with Monroe Tinker?</p> <p>3 A Yes.</p> <p>4 Q When did you work with Mr. Tinker?</p> <p>5 A When?</p> <p>6 Q Yeah.</p> <p>7 Let me ask a better question: Did you</p> <p>8 ever work with Mr. Tinker on the care of either</p> <p>9 Mr. Depp or Ms. Heard?</p> <p>10 A I don't recall specifically.</p> <p>11 Q Okay. I'm going to show you -- there's</p> <p>12 probably going to be a lot of documents you're</p> <p>13 going to be seeing over this day, so bear with us.</p> <p>14 Okay? A little down memory lane.</p> <p>15 MR. NADELHAFT: Can we put up</p> <p>16 Attachment 2, and we'll call this Lloyd Exhibit 1.</p> <p>17 AV TECHNICIAN: Please stand by.</p> <p>18 (Lloyd 1, Ms. Lloyd's nursing notes, Bates</p> <p>19 Nos. Kipper 0053 through Kipper 0175, was marked</p> <p>20 for identification and is attached to the</p> <p>21 transcript.)</p> <p>22 AV TECHNICIAN: Exhibit 1.</p>	<p style="text-align: right;">40</p> <p>1 on, you know, her review of the first half of the</p> <p>2 first page.</p> <p>3 MR. NADELHAFT: Okay.</p> <p>4 BY MR. NADELHAFT:</p> <p>5 Q And if, at a break, you want to go over</p> <p>6 and see the whole thing, I'm -- you know, I'm</p> <p>7 happy to let you do that, just to save time rather</p> <p>8 than have you read 123 pages.</p> <p>9 But did you take -- did you create these</p> <p>10 notes in the ordinary course of business?</p> <p>11 A Can you clarify what that means.</p> <p>12 Q You created these notes as part of your</p> <p>13 job of being a nurse, correct?</p> <p>14 A Yes.</p> <p>15 Q Okay. Did Dr. Kipper ask you to keep</p> <p>16 these notes?</p> <p>17 A We just keep notes as nurses. I don't</p> <p>18 recall.</p> <p>19 Q So this is your normal practice, keeping</p> <p>20 these notes. It's not particular to Mr. Depp,</p> <p>21 correct?</p> <p>22 A Correct.</p>

41	<p>1 Q Did you receive any training into how to</p> <p>2 keep these notes?</p> <p>3 A Nursing school.</p> <p>4 Q Okay. And the notes are typed, right?</p> <p>5 A Yes.</p> <p>6 Q Did you bring a laptop with you when you</p> <p>7 were working with Mr. Depp?</p> <p>8 A Yes.</p> <p>9 Q So were you typing these notes as the</p> <p>10 events were happening or at another time?</p> <p>11 MS. HICKOX: Objection; vague.</p> <p>12 MS. MEYERS: Objection; compound.</p> <p>13 Q Let me ask you again. I'm just trying to</p> <p>14 get a sense as to when you would --</p> <p>15 Well, let's just go to the first one. It</p> <p>16 says June 12, 2014 - 2300. Do you see that?</p> <p>17 A Yes.</p> <p>18 Q And 2300, that's military time, correct?</p> <p>19 A Yes.</p> <p>20 Q So that's 11:00 p.m. at night?</p> <p>21 A Yes.</p> <p>22 Q Okay. And it says, RN and MD met with</p>	43	<p>1 A Correct.</p> <p>2 Q Okay. Did anyone review the notes?</p> <p>3 MS. HICKOX: Objection; vague, calls for</p> <p>4 speculation, potentially calls for hearsay.</p> <p>5 You can answer, if you know.</p> <p>6 THE WITNESS: Notes were sent to</p> <p>7 Dr. Kipper.</p> <p>8 Q How often would you send the notes to</p> <p>9 Dr. Kipper?</p> <p>10 A I don't recall.</p> <p>11 Q And was there a system where he can see</p> <p>12 the notes, or did you e-mail him -- Dr. Kipper the</p> <p>13 notes?</p> <p>14 A E-mail.</p> <p>15 Q So is it your understanding based on these</p> <p>16 notes that the first time you met Mr. Depp was on</p> <p>17 June 12, 2014?</p> <p>18 A Yes.</p> <p>19 Q And if we scroll down to the 6/13/14, this</p> <p>20 says you met with patient in his apartment,</p> <p>21 correct?</p> <p>22 A Correct.</p>
42	<p>1 patient to discuss plan and medication regime.</p> <p>2 Do you see that?</p> <p>3 A Yes.</p> <p>4 Q The "RN" is you, correct?</p> <p>5 A Correct.</p> <p>6 Q And the "MD" is Dr. Kipper?</p> <p>7 A Correct.</p> <p>8 Q And "the patient" is Mr. Depp, right?</p> <p>9 A Correct.</p> <p>10 Q Okay. So where it says 6/12/14 at 2300,</p> <p>11 is that when you met with Mr. Depp or is that when</p> <p>12 you wrote up the note?</p> <p>13 A That's when I wrote up the note.</p> <p>14 Q Okay. So you may have met with Mr. Depp</p> <p>15 at some other time before this?</p> <p>16 A Sometime during that day.</p> <p>17 Q Okay. So the time you have here is when</p> <p>18 you wrote the note?</p> <p>19 A Correct.</p> <p>20 Q Okay. And would you typically type the</p> <p>21 notes as opposed to writing notes in handwriting</p> <p>22 and then typing notes?</p>	44	<p>1 Q So the next day you met with Mr. Depp in</p> <p>2 his apartment; is that right?</p> <p>3 A According to my notes. I don't recall.</p> <p>4 Q Okay. And the second line you write: He</p> <p>5 stated that he initially started taking opiates</p> <p>6 after some dental work and became dependent on</p> <p>7 them.</p> <p>8 That is -- is that something that Mr. Depp</p> <p>9 told you?</p> <p>10 A According to my notes.</p> <p>11 Q Would there be a reason you would write</p> <p>12 that if Mr. Depp did not tell you that?</p> <p>13 A No.</p> <p>14 Q And then you write: Patient is fearful of</p> <p>15 coming off of opiates, but knows it's what he</p> <p>16 needs to do.</p> <p>17 So, again, that's something, according to</p> <p>18 your notes, that Mr. Depp told you?</p> <p>19 MS. MEYERS: Objection; calls for hearsay.</p> <p>20 Go ahead.</p> <p>21 THE WITNESS: According to my notes, yes.</p> <p>22 Q And then it says, Patient also expressed</p>

<p style="text-align: right;">45</p> <p>1 some emotional trauma which causes him depression 2 and anxiety. 3 Again, according to your notes, that's 4 what Mr. Depp told you? 5 MS. MEYERS: Objection; calls for hearsay. 6 THE WITNESS: According to my notes, yes. 7 Q Do you recall at all what the emotional 8 trauma was that was causing Mr. Depp depression 9 and anxiety? 10 A I do not recall. 11 Q Okay. 12 MR. NADELHAFT: If we can go to Kipper 61, 13 which is page 9 of this document. 14 Q Do you see where it says 6/24/14? 15 A I'm still trying to find where we are. 16 6/24. Okay. 17 Q Do you have your notes in front of you? 18 A Yes. 19 Q Okay. And feel free to -- do you have any 20 handwriting on the notes or anything like that? 21 A No. 22 Q Okay. So feel free to look at that, if</p>	<p style="text-align: right;">47</p> <p>1 MS. HICKOX: Objection; calls for hearsay, 2 compound, vague, calls for speculation. 3 MS. MEYERS: Join. 4 THE WITNESS: I'm -- I can only go by what 5 my notes say at this time. 6 BY MR. NADELHAFT: 7 Q Is there any reason for you to believe 8 your notes are wrong? 9 A No reason to believe that, no. 10 Q It then says, She -- 11 And "she" is Amber, correct? 12 A Correct. 13 Q -- is in agreement of treatment plan and 14 supportive of patient's decision to detox after he 15 finishes filming. 16 And that is something Ms. Heard told you 17 as reflected in your notes? 18 MS. MEYERS: Objection; calls for hearsay. 19 Go ahead. 20 THE WITNESS: Yes, according to my notes. 21 Q All right. Do you recall what the plan 22 was for Mr. Depp's detox?</p>
<p style="text-align: right;">46</p> <p>1 that's easier for you. I'll be saying what the 2 Bates number is on my end, but if it's easier for 3 you to look at the notes in person, that's fine. 4 A Okay. 5 Q And you see where it says 6/24/14 - 1200? 6 A Yes. 7 Q And it says, RN and MD met with patient's 8 fiancé [sic] to inform her of treatment plan for 9 patient. 10 Patient's fiancé is Amber Heard, correct? 11 A Correct. 12 Q And then it says, Fiancé voiced concerns 13 of patient's behavior while using drugs and 14 alcohol. 15 That's something Ms. Heard told you as 16 reflected in your notes? 17 MS. MEYERS: Objection; calls for hearsay. 18 Q You can answer. 19 A According to my notes, yes. 20 Q Do you recall Amber Heard ever voicing 21 concern about Mr. Depp's behavior while using 22 drugs and alcohol?</p>	<p style="text-align: right;">48</p> <p>1 MS. HICKOX: Objection; vague, calls for 2 speculation. 3 BY MR. NADELHAFT: 4 Q And let me ask this again: Do you recall 5 what the plan was for Mr. Depp's detox as of the 6 end of June 2014? 7 MS. HICKOX: Same objections. 8 THE WITNESS: "Plan" in what regards? 9 Q Where was Mr. Depp's detox going to take 10 place? 11 A I don't remember when it was determined, 12 but I remember that it was after filming we would 13 go to the island. 14 Q And that's the island that Mr. Depp owns? 15 A Yes. 16 Q And you went -- you went to the island, 17 correct? 18 A Correct. 19 Q Who else was on the island in this time 20 when Mr. Depp was doing the detox? 21 MS. HICKOX: Objection; calls for 22 speculation, assumes facts not in evidence.</p>

<p style="text-align: right;">49</p> <p>1 You can answer, if you know.</p> <p>2 THE WITNESS: I know I was there. I</p> <p>3 cannot remember if Amber was there the entire</p> <p>4 time. And some of Johnny's staff and Dr. Kipper</p> <p>5 came at some point.</p> <p>6 BY MR. NADELHAFT:</p> <p>7 Q How did you get to Mr. Depp's island?</p> <p>8 A Flew.</p> <p>9 Q And then what, did you take a boat to</p> <p>10 the -- to his island?</p> <p>11 A Yes.</p> <p>12 Q And if we go to in the same document,</p> <p>13 Kipper 69, which I believe is page 17.</p> <p>14 You see where it says 8/8/14?</p> <p>15 A Yes.</p> <p>16 Q And it says, Arrived on island today.</p> <p>17 A Yes.</p> <p>18 Q Does that mean that you arrived on the</p> <p>19 island on August 8, 2014?</p> <p>20 A According to my notes.</p> <p>21 Q Okay. And on August 9, 2014, it says,</p> <p>22 Patient expressed fears of never feeling normal</p>	<p style="text-align: right;">51</p> <p>1 you see August 15, 2014?</p> <p>2 A Yes.</p> <p>3 Q And you wrote --</p> <p>4 And this is at 0130. So that's 1:30 in</p> <p>5 the morning?</p> <p>6 A Yes.</p> <p>7 Q -- Text from fiancé that patient is,</p> <p>8 quote, paranoid and trying to fight with fiancé.</p> <p>9 States he is, quote, angry and, quote, freaking</p> <p>10 out - RN and MD went to assess patient.</p> <p>11 You wrote that note?</p> <p>12 A Correct.</p> <p>13 Q Okay. And the text from the fiancé,</p> <p>14 that's referring to Amber Heard, correct?</p> <p>15 A Correct.</p> <p>16 Q Okay. And you would sometimes, it seems,</p> <p>17 document texts or other communications that you</p> <p>18 received from either Mr. Depp or Amber Heard; is</p> <p>19 that right?</p> <p>20 A According to the notes.</p> <p>21 Q Okay.</p> <p>22 MR. NADELHAFT: Can you put up</p>
<p style="text-align: right;">50</p> <p>1 without his drugs.</p> <p>2 You wrote that?</p> <p>3 A Yes.</p> <p>4 Q Okay. And is that something that Mr. Depp</p> <p>5 told you?</p> <p>6 MS. MEYERS: Objection; calls for hearsay.</p> <p>7 THE WITNESS: According to my notes, yes.</p> <p>8 MR. NADELHAFT: And if we go two pages to</p> <p>9 Kipper 71. Oh, you can -- yeah, there we go.</p> <p>10 Q Do you see where it says at the top, MD's</p> <p>11 flight has been cancelled?</p> <p>12 A Yes.</p> <p>13 Q Arrangements are being made for him to</p> <p>14 arrive on the island 8/12/14.</p> <p>15 A Yes.</p> <p>16 Q So according to your notes, Dr. Kipper,</p> <p>17 after the flight was cancelled, was set to arrive</p> <p>18 on the island on August 12, 2014?</p> <p>19 A According to my notes.</p> <p>20 Q Do you recall working with Mr. Depp --</p> <p>21 strike that.</p> <p>22 Then on -- let's move to Kipper 76. And</p>	<p style="text-align: right;">52</p> <p>1 Attachment 3. Keep this other one up.</p> <p>2 (Lloyd 2, Text message chain between Heard</p> <p>3 and Lloyd, Bates Nos. ALH_00016108 through</p> <p>4 ALH_00016113, was marked for identification and is</p> <p>5 attached to the transcript.)</p> <p>6 AV TECHNICIAN: Exhibit 2. Exhibit 1 is</p> <p>7 to the left.</p> <p>8 MR. NADELHAFT: Okay. Thank you. And you</p> <p>9 can blow this up a little bit.</p> <p>10 BY MR. NADELHAFT:</p> <p>11 Q Ms. Lloyd, I'm showing you what's been</p> <p>12 marked as Exhibit -- Lloyd Exhibit 2, which is</p> <p>13 ALH 16110 through -113. If you'd like, you can</p> <p>14 take a look through the text message and then I</p> <p>15 just want to ask you a couple questions about it.</p> <p>16 I guess you can tell the tech when you're ready to</p> <p>17 move down.</p> <p>18 THE WITNESS: Okay.</p> <p>19 MR. NADELHAFT: Okay, you can move down.</p> <p>20 THE WITNESS: Wait, can you go back for a</p> <p>21 minute. Just between the last one and we're</p> <p>22 jonesing [sic]? What's...</p>

<p style="text-align: right;">53</p> <p>1 Q There's nothing between "he's joneses" 2 and -- 3 A Okay, okay. 4 Okay. 5 MR. NADELHAFT: You can keep going down. 6 THE WITNESS: Okay. 7 MR. NADELHAFT: Okay. You can keep going 8 down. I think you can keep going. 9 THE WITNESS: Okay. 10 Okay. 11 Okay. 12 MR. NADELHAFT: Okay, you can keep going 13 down. 14 THE WITNESS: Okay. 15 Okay. 16 Okay. 17 Okay. 18 Okay. 19 Seems like those are out of order, but 20 okay. 21 Okay. 22 Q All right. After looking through the text</p>	<p style="text-align: right;">55</p> <p>1 Physically or emotionally? 2 A According to this text, yes. 3 Q And then Amber wrote: He's paranoid and 4 desperately trying to fight with me. I keep not 5 responding but it's making him persist and I don't 6 know what else to do. He's angry and well, 7 freaking out - for lack of better words. 8 You received that text from Amber? 9 MS. MEYERS: Objection -- 10 THE WITNESS: According to this -- 11 MS. MEYERS: -- calls for hearsay. 12 Go ahead. Sorry. 13 Q Go ahead. Did you answer, Ms. Lloyd? I'm 14 sorry. 15 A According to this, yes. 16 Q And if we go back to Lloyd Exhibit 1, 17 where it shows at 8/15/14 at 130, Text from fiancé 18 that patient is paranoid and trying to fight with 19 fiancé. States he's angry and freaking out. Is 20 it your understanding that the text we just looked 21 at is what's referred to in your notes? 22 A I don't recall at the time, but appears to</p>
<p style="text-align: right;">54</p> <p>1 messages, this text message chain, do you remember 2 texting with Amber at all while you were on the 3 island with Mr. Depp? 4 A That is some of how we communicated, yes. 5 Q And does this refresh your recollection 6 that Amber was at least at some point on the 7 island with Mr. Depp during the detox? 8 A Yes. 9 Q Okay. Turn to page 3 of this. 10 Is that -- the gray part of the text is 11 your text, correct? 12 A Yes. 13 Q And the blue is Amber? 14 A Yes. 15 Q And in the gray part of the text where it 16 shows a phone number there, is that your cell 17 phone number? 18 A Yes. 19 Q And Amber texted you: J is freaking out? 20 MS. MEYERS: Objection; calls for hearsay. 21 THE WITNESS: That's what this text shows. 22 Q And you responded: In what way?</p>	<p style="text-align: right;">56</p> <p>1 be now, yes. 2 MR. NADELHAFT: Can you put up 3 Attachment 4, please. 4 (Lloyd 3, Text message chain between Heard 5 and Lloyd, Bates Nos. ALH_00016120 through 6 ALH_00016123, was marked for identification and is 7 attached to the transcript.) 8 AV TECHNICIAN: Exhibit 3. 9 Q Ms. Lloyd, I'm showing you what's been 10 marked as Exhibit 3, a text message chain between 11 you and Amber Heard on August 16, 2014. 12 And, again, in the gray box where it shows 13 your -- a phone number, that's your phone number, 14 correct? 15 A Correct. 16 Q Okay. And you gave Amber and Mr. Depp 17 your phone number to text if there were -- or call 18 if there were any issues -- 19 MS. MEYERS: Objection -- 20 Q -- while on the island? 21 MS. MEYERS: Objection; leading, form, 22 compound.</p>

<p style="text-align: right;">57</p> <p>1 THE WITNESS: Yes. They had my number. 2 BY MR. NADELHAFT: 3 Q Okay. And Amber wrote on the fourth 4 message down, He's clearly exhausted but can lay 5 still - he's a bit erratic and really not making 6 any sense. 7 You received that text message from Amber? 8 A According to this. 9 Q Do you recall Mr. Depp ever being erratic 10 and not making any sense at any time? 11 A I don't recall. 12 Q And you wrote, You were so strong last 13 night. You did all the right things. He can take 14 his morning meds. 15 You wrote that? 16 A According to this. 17 Q Do you recall what you believed Amber was 18 so strong about? 19 A I don't recall. 20 MR. NADELHAFT: Can we go down to the 21 fourth page. 22 Q Amber writes to you: I found his bag of</p>	<p style="text-align: right;">59</p> <p>1 AV TECHNICIAN: Exhibit 4. 2 BY MR. NADELHAFT: 3 Q And, Ms. Lloyd, I'm showing you what's 4 been marked as Lloyd Exhibit 4, a text message 5 chain between you and Amber on August 18, 2014. 6 Do you see that? 7 A Yes. 8 Q Okay. And the gray is -- which has a 9 phone number, that's, again, your phone number, 10 correct? 11 A Correct. 12 Q Okay. Do you recall, when on the island, 13 Amber would be telling you how Mr. Depp was doing? 14 MS. HICKOX: Objection; vague, calls for 15 speculation. Objection; compound. 16 MS. MEYERS: Join. 17 Q You can answer. 18 A According to these texts that's what was 19 happening, yes. 20 Q Do you recall how long you were on the 21 island? 22 A I do not.</p>
<p style="text-align: right;">58</p> <p>1 meds. 2 Do you know what that's referring to? 3 A I don't recall. 4 MS. HICKOX: Objection -- 5 One second. 6 Objection; calls for speculation. And I'm 7 a bit concerned that we're kind of cherry-picking 8 some text messages. 9 Debbie, if you want to read it, it's just 10 a four-page chain, I would encourage you to do so. 11 Q You're more than welcome. Do you need to 12 read -- I was going to be done with this, but 13 you're -- feel free, if you want to read the rest 14 of the chain. 15 A I'm -- I'm okay. 16 Q Okay. 17 MR. NADELHAFT: We can take this down. 18 And if you can put up Attachment 5. 19 (Lloyd 4, Text message chain between Heard 20 and Lloyd, Bates Nos. ALH_00016127 through 21 ALH_00016130, was marked for identification and is 22 attached to the transcript.)</p>	<p style="text-align: right;">60</p> <p>1 Q In a day -- in a day do you recall how 2 long you would see Mr. Depp? 3 A It varied. 4 Q Okay. Would there be reasons why it 5 varied as to how long you'd see Mr. Depp in a day? 6 A I don't recall what -- how it was 7 determined. 8 Q How far away were you from where Mr. Depp 9 was staying? 10 A Five to ten minutes. 11 Q By foot or by something -- some other 12 transportation? 13 A By a John Deere tractor. 14 Q And where -- what type of place were you 15 staying in on the island? 16 A It was a yurt. 17 Q And were you staying with anyone? 18 A I was by myself some of the time, and then 19 Dr. Kipper was also in the yurt for some of the 20 time. 21 Q And did the yurt have separate rooms? 22 A Yes.</p>

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<p style="text-align: right;">61</p> <p>1 Q And would you typically eat with Mr. Depp?</p> <p>2 A Varied.</p> <p>3 Q And what was your -- when you were on the</p> <p>4 island, what was your role in terms of Mr. Depp's</p> <p>5 detox?</p> <p>6 A Medication management.</p> <p>7 MS. HICKOX: Objection --</p> <p>8 Give me a second to object first.</p> <p>9 Objection to the question. It was vague.</p> <p>10 Q And what do you mean by "medication</p> <p>11 management"?</p> <p>12 A To administer medications.</p> <p>13 Q And was Dr. Kipper the person who was</p> <p>14 prescribing the medications?</p> <p>15 A Yes.</p> <p>16 Q Did -- as part of the medication</p> <p>17 management, did Mr. Depp get a bag of meds?</p> <p>18 MS. HICKOX: Objection; vague, calls for</p> <p>19 speculation, lacks foundation.</p> <p>20 MS. MEYERS: Objection; leading. And join</p> <p>21 in the other objections.</p> <p>22 Q You can answer to the extent you know.</p>	<p style="text-align: right;">63</p> <p>1 text, Amber wrote to you that Mr. Depp was super</p> <p>2 angry and in a bad mood?</p> <p>3 MS. MEYERS: Objection; hearsay -- calls</p> <p>4 for hearsay.</p> <p>5 THE WITNESS: Yes.</p> <p>6 Q And then you received a text from Amber</p> <p>7 that says -- well, you asked, Are you guys</p> <p>8 talking? Has he taken morning meds?</p> <p>9 You wrote that text, correct?</p> <p>10 A Correct.</p> <p>11 Q And then Amber wrote: Yes, but it's</p> <p>12 rough. He always works himself into a rage</p> <p>13 without any provocation. Making me not feel like</p> <p>14 I can even converse with him.</p> <p>15 You received that text, correct?</p> <p>16 MS. MEYERS: Objection; calls for hearsay.</p> <p>17 THE WITNESS: According to this.</p> <p>18 This it says he took his a.m. meds at --</p> <p>19 that text, 7:26, and then he just took his a.m.</p> <p>20 meds 7:27. Okay.</p> <p>21 Q Okay. Going back to Exhibit 1, and if we</p> <p>22 can go to Kipper 77. If we go down to the bottom</p>
<p style="text-align: right;">62</p> <p>1 A Did I give Mr. Depp a bag of medications?</p> <p>2 Q Either you or Dr. Kipper.</p> <p>3 A Not that I recall.</p> <p>4 Q Looking through -- you can look through</p> <p>5 these texts, Lloyd Exhibit 4.</p> <p>6 A Okay.</p> <p>7 Okay.</p> <p>8 Wait. Hold on. Sorry. Don't leave...</p> <p>9 10:17. We won't.</p> <p>10 It looks -- okay.</p> <p>11 Okay.</p> <p>12 Q Staying on this last page for a second of</p> <p>13 Lloyd 4, the picture of -- it looks like a pill</p> <p>14 box, right?</p> <p>15 A Correct.</p> <p>16 Q Would you have provided either Mr. Depp or</p> <p>17 Ms. Heard Mr. Depp's medications in a box like</p> <p>18 this?</p> <p>19 A Yes.</p> <p>20 MS. HICKOX: Objection; compound, assumes</p> <p>21 facts.</p> <p>22 Q Okay. And if we go up to page 2 of this</p>	<p style="text-align: right;">64</p> <p>1 here, you see August 18, 2014 at 0100? Do you see</p> <p>2 that?</p> <p>3 A What? I'm sorry.</p> <p>4 Q I'm sorry. So we're now on your nursing</p> <p>5 notes, Lloyd Exhibit 1, entry for August 18, 2014</p> <p>6 at 0100 hours.</p> <p>7 A Yup.</p> <p>8 Q Okay. And you wrote, Text from fiancé</p> <p>9 that patient is upset and irritable. MD and RN</p> <p>10 went to assess patient. He states that he had a</p> <p>11 fight with fiancé and is questioning whether or</p> <p>12 not he can emotionally and physically handle</p> <p>13 detox.</p> <p>14 Do you see that?</p> <p>15 A Yes.</p> <p>16 Q Okay. And this is notes that you wrote?</p> <p>17 A Yes.</p> <p>18 Q Do you recall talking with Mr. Depp that</p> <p>19 he had a fight with his fian- -- with Amber?</p> <p>20 MS. MEYERS: Objection; calls for hearsay.</p> <p>21 THE WITNESS: I can only remember what my</p> <p>22 notes are showing.</p>

<p style="text-align: right;">65</p> <p>1 Q Okay. So do you have any independent 2 memories of what occurred on the island other than 3 what's in your notes? 4 A Not specifically. 5 MS. MEYERS: Objection; vague. 6 Q I'm sorry, did you say "not specifically"? 7 A Yes. 8 Q Okay. Do you recall Amber ever telling 9 you or Dr. Kipper that Mr. Depp had pushed her, 10 when you guys -- when you were on the island? 11 MS. MEYERS: Objection; calls for hearsay, 12 calls for speculation. 13 THE WITNESS: I don't recall. 14 MR. NADELHAFT: If we go two pages down 15 more, Kipper 79. 16 Q And do you see -- 17 MR. NADELHAFT: Actually, go up a page. 18 Yeah. 19 Okay. Why don't we actually take a break 20 for this moment. We've been about an hour. Take 21 a, I don't know, five-minute break? If you need 22 more, I'm happy to give you more.</p>	<p style="text-align: right;">67</p> <p>1 fiancé stating, quote, he's manic, full on 2 flipping out, give up, not to call you guys, end 3 quote? You wrote that in your notes? 4 A I see that in my notes, yes. 5 Q And then you wrote, Instructed to give HS 6 meds and additional Seroquel 50 milligrams and to 7 call if RN needs to go assess patient, correct? 8 A Correct. 9 Q What does "HS" mean? 10 A Bedtime. Hours of sleep. 11 Q Uh-huh. If we go to the -- and you wrote 12 the note at 2315, according to your notes, based 13 on a text you received from Amber; is that right? 14 MS. MEYERS: Objection; calls for hearsay. 15 THE WITNESS: According to my notes, yes. 16 Q If we go to the next page, do you see at 17 0820 it says, RN received text from fiancé 18 stating, quote, We need help, he's at the border, 19 refusing to take his meds. Fiancé informed RN 20 would come right over? 21 You wrote those notes? 22 A Correct.</p>
<p style="text-align: right;">66</p> <p>1 MS. HICKOX: Let's just do, like, a 2 ten-minute break. 3 MR. NADELHAFT: Ten minutes, that's fine. 4 MS. HICKOX: All right. 5 THE VIDEOGRAPHER: The time is 6 10- [sic] -- 7 MR. NADELHAFT: Go ahead. 8 THE VIDEOGRAPHER: Sorry. The time is 9 1:05 p.m. We are going off the record. 10 (Recess was held.) 11 THE VIDEOGRAPHER: The time is 1:16 p.m. 12 We're now back on the record. 13 MR. NADELHAFT: Welcome back after a short 14 break. 15 Can you put back up Exhibit I again, 16 please. Can I see the full document on this? 17 Yeah, go down one more page. Okay. 18 BY MR. NADELHAFT: 19 Q Do you see on Kipper 79 for August 20, 20 2014 at 2315 near the bottom of the page -- 21 A Uh-huh. 22 Q -- you wrote: RN received text from</p>	<p style="text-align: right;">68</p> <p>1 Q And you wrote those notes based on a text 2 you received from Amber, correct? 3 MS. MEYERS: Objection; calls for hearsay. 4 Q You can answer. 5 A I -- I don't recall. 6 Q Is there any reason to believe, where you 7 wrote RN received text from fiancé, that that's 8 not a text you received from Amber Heard? 9 A No. 10 Q Okay. 11 MR. NADELHAFT: Can we put up 12 Attachment 36, please. 13 (Lloyd 5, Text Extraction Report between 14 Depp and Lloyd, Bates No. DEPP00007819, was marked 15 for identification and is attached to the 16 transcript.) 17 AV TECHNICIAN: Exhibit 5. 18 Q And, Ms. Lloyd, this is -- Lloyd Exhibit 5 19 is a chart of text messages we received from -- in 20 a production from Mr. Depp. It is DEPP 7819. Do 21 you see the second entry, entry 131? 22 A Yes.</p>

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1 Q And where in the third row there's your
 2 name and above that name is a phone number, is
 3 that your phone number?
 4 **A Yes.**
 5 Q And you would sometimes text message with
 6 Mr. Depp, too, correct?
 7 **A Correct.**
 8 Q You see it says in the body on that row
 9 131, I will come by 80 within an hour to drop meds
 10 off just in case. How are you feeling? Your head
 11 back on straight?
 12 Do you see that?
 13 **A I see that.**
 14 Q And this was a text you wrote to Mr. Depp?
 15 **A According to this.**
 16 Q Do you recall as of around August 26, 2014
 17 what you meant by: Your head back on straight?
 18 **A I don't recall.**
 19 Q And then Mr. Depp responded to you, do you
 20 see in the next row, pretty much. I don't have
 21 the ability to take anything more on my back right
 22 now... I'm fucking strong... if my arm is

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1 gangrenous, I would cut off -- I would cut the
 2 fucker off. If I am threatened by the love I
 3 feel... I need to stop. simple math.
 4 Do you recall receiving that text from
 5 Mr. Depp?
 6 **A I don't recall. No, I don't recall**
 7 **receiving that.**
 8 Q That was just a type of a -- do you recall
 9 receiving texts -- does this sound like Mr. Depp?
 10 MS. HICKOX: Objection; vague, calls for
 11 speculation.
 12 THE WITNESS: I'm -- what do you mean,
 13 does this sound like Mr. Depp?
 14 Q Is this the way Mr. Depp typically wrote
 15 to you?
 16 MS. HICKOX: Objection; vague.
 17 THE WITNESS: I don't recall much about
 18 text messages from that time.
 19 Q Okay. Do you have any reason to believe
 20 you did not receive this text from Mr. Depp?
 21 **A No.**
 22 Q Okay.

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1 MR. NADELHAFT: If we can go back to
 2 Exhibit 1, and if you can go to Kipper 101.
 3 Q Ms. Lloyd, this is for September 22, 2014.
 4 **A What's the numbers on the bottom of the**
 5 **page?**
 6 Q I don't know what you have there, but
 7 19STCP04763.
 8 **A Oh, no, it's not the same. Okay. What's**
 9 **the date on the top? I'm sorry.**
 10 Q No problem. September 22, 2014.
 11 **A Okay.**
 12 Q And you see where it says 0125 under
 13 September 22, 2014?
 14 **A Yes.**
 15 Q And you wrote: RN received text from
 16 patient stating that he had been in an argument
 17 with fiancé and she, quote, had a nasty freakout,
 18 end quote, and he would like RN to come give him
 19 some -- quote, some fuckin' knockout yum, yum. RN
 20 instructed patient to take prn Neurontin 300
 21 milligrams prn and Seroquel 50 milligrams and that
 22 RN was on her way over.

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1 You wrote that?
 2 **A Yes.**
 3 Q Do you recall where you were in
 4 September 2014 with Mr. Depp and Amber?
 5 **A I don't recall.**
 6 MS. MEYERS: Objection; assumes facts not
 7 in evidence.
 8 Q Do you recall -- do you have any
 9 understanding as to what Mr. Depp meant by "some
 10 fuckin' knockout yum, yum"?
 11 MS. MEYERS: Objection; calls for hearsay,
 12 calls for speculation.
 13 MS. HICKOX: Join.
 14 THE WITNESS: I don't recall what he was
 15 referring to.
 16 Q Do you believe it was some sort of drugs
 17 that Mr. Depp was looking for?
 18 MS. HICKOX: Objection.
 19 MS. MEYERS: Objection; calls for
 20 speculation, calls for hearsay.
 21 Sorry, Cindy.
 22 MS. HICKOX: Join.

<p style="text-align: right;">73</p> <p>1 THE WITNESS: Prescribed medication.</p> <p>2 BY MR. NADELHAFT:</p> <p>3 Q What would be a knockout prescribed</p> <p>4 medication?</p> <p>5 MS. HICKOX: Objection; calls for</p> <p>6 speculation, vague, asked and answered.</p> <p>7 MS. MEYERS: Join.</p> <p>8 MS. HICKOX: And I'm going to remind</p> <p>9 Ms. Lloyd not to guess if she doesn't know.</p> <p>10 THE WITNESS: I don't know what he was</p> <p>11 referring to.</p> <p>12 Q Do you recall anything about what -- the</p> <p>13 "nasty freakout" that Mr. Depp was referring to</p> <p>14 about Amber?</p> <p>15 MS. HICKOX: Objection; calls for</p> <p>16 speculation, vague, assumes facts not in evidence.</p> <p>17 THE WITNESS: I do not recall.</p> <p>18 Q And then you see the --</p> <p>19 By the way, are your notes, the ones in</p> <p>20 front of you, are they highlighted --</p> <p>21 A It --</p> <p>22 Q -- like what's on the computer?</p>	<p style="text-align: right;">75</p> <p>1 fiancé got upset that he was not giving her enough</p> <p>2 support and the fight escalated from there.</p> <p>3 You wrote that -- you wrote that note?</p> <p>4 A According to this, yes.</p> <p>5 Q Do you recall going to Mr. Depp's home and</p> <p>6 seeing him with scraped and bloody knuckles on his</p> <p>7 right hand?</p> <p>8 A I do not recall.</p> <p>9 Q Do you ever recall any incident where</p> <p>10 Mr. Depp had claimed he punched a whiteboard in</p> <p>11 the kitchen?</p> <p>12 A I do not.</p> <p>13 Q Do you have any reason to believe where</p> <p>14 you wrote that -- you wrote: Upon arriving at the</p> <p>15 home, patient was sitting in kitchen with scraped</p> <p>16 and bloody knuckles on right hand?</p> <p>17 Would you have written that based on your</p> <p>18 observation of Mr. Depp?</p> <p>19 A Yes.</p> <p>20 Q And you don't recall anything about this</p> <p>21 incident based on the note here?</p> <p>22 A I do not.</p>
<p style="text-align: right;">74</p> <p>1 A Yes.</p> <p>2 Q Okay. Is that highlighting from you?</p> <p>3 A I don't know. I don't recall.</p> <p>4 Q Was it your practice to highlight certain</p> <p>5 notes?</p> <p>6 A No.</p> <p>7 Q Okay. And I assume, then, you don't know</p> <p>8 who would have done the highlighting on these</p> <p>9 notes.</p> <p>10 A I do not.</p> <p>11 Q Okay. And then you see the note for 0330</p> <p>12 for September 22, 2014?</p> <p>13 A Yes.</p> <p>14 Q And, again, that's 3:30 in the morning,</p> <p>15 right?</p> <p>16 A Correct.</p> <p>17 Q And you wrote, Upon arriving at the home</p> <p>18 patient was sitting in kitchen with scraped and</p> <p>19 bloody knuckles on right hand. Patient stated he</p> <p>20 had punched white board in kitchen after fight.</p> <p>21 Patient stated he had been texting his friend</p> <p>22 explaining why he didn't show up to play music and</p>	<p style="text-align: right;">76</p> <p>1 Q Okay.</p> <p>2 MR. NADELHAFT: And if we can go to</p> <p>3 Kipper -- just one second -- Kipper 111, which is</p> <p>4 page 59. Okay, you got it.</p> <p>5 Q And, Ms. Lloyd, that's for -- I'm looking</p> <p>6 at -- it goes -- the page before it is for</p> <p>7 October 14, 2014, and then it goes into the next</p> <p>8 page. Do you see that?</p> <p>9 A A hundred -- so we're on the page -- okay.</p> <p>10 Yes, yes, I'm on that page.</p> <p>11 Q Okay. And on Kipper 111 there's a</p> <p>12 highlighted note at 1930 for October 14th. Do you</p> <p>13 see that?</p> <p>14 A Oh, wait a minute. Yes.</p> <p>15 Q Okay. And you wrote, patient finished</p> <p>16 filming and was extremely agitated leaving the</p> <p>17 set. Patient kicked in the door of his trailer</p> <p>18 and refused to speak to director. Patient was</p> <p>19 verbally aggressive to another person on the set</p> <p>20 so no apparent -- for no apparent reason. Per MD</p> <p>21 patient is to take Xanax 2 milligrams to reduce</p> <p>22 his agitation at this time.</p>

<p style="text-align: right;">77</p> <p>1 You wrote that?</p> <p>2 A According to these notes, yes.</p> <p>3 Q And was -- were these notes based on your</p> <p>4 observation of Mr. Depp?</p> <p>5 A I don't recall.</p> <p>6 Q Would you go to -- would you have -- did</p> <p>7 you ever attend filming where Mr. Depp was</p> <p>8 filming?</p> <p>9 A Yes.</p> <p>10 Q Where you wrote "patient kicked in the</p> <p>11 door of his trailer and refused to speak to</p> <p>12 director," that's based on your observation of</p> <p>13 Mr. Depp?</p> <p>14 A I don't recall.</p> <p>15 Q And where you wrote "Patient was verbally</p> <p>16 aggressive to another person on the set so no</p> <p>17 apparent reason," do you recall what that's based</p> <p>18 on?</p> <p>19 A I do not.</p> <p>20 Q Would it have been based on anything other</p> <p>21 than your observation of Mr. Depp?</p> <p>22 A I don't recall.</p>	<p style="text-align: right;">79</p> <p>1 appeared agitated and was short towards RN,"</p> <p>2 meaning Mr. Depp was short towards you, correct?</p> <p>3 MS. MEYERS: Objection; leading.</p> <p>4 THE WITNESS: I don't remember.</p> <p>5 Q That's what the -- that's what the note</p> <p>6 means, right? Is there a reason to believe --</p> <p>7 A That's what it says, yes.</p> <p>8 Q Okay. And this note would have been based</p> <p>9 on your observation of Mr. Depp at the time,</p> <p>10 correct?</p> <p>11 A I don't remember.</p> <p>12 Q And then you see where in that note for</p> <p>13 1630 you wrote: Patient states he's okay at this</p> <p>14 time. Do you see that?</p> <p>15 A I do.</p> <p>16 Q So that's where Mr. Depp told you he was</p> <p>17 okay at the time, correct?</p> <p>18 A According to this, yeah. I don't -- I</p> <p>19 don't remember this instance. I'm sorry.</p> <p>20 Q No, that's okay.</p> <p>21 And then you wrote: Per patient's sister</p> <p>22 he's upset with the director for making him do too</p>
<p style="text-align: right;">78</p> <p>1 Q If you had been told that Mr. Depp was</p> <p>2 verbally aggressive, would you have written that</p> <p>3 in your note?</p> <p>4 MS. HICKOX: Objection; calls for</p> <p>5 speculation, incomplete hypothetical, vague.</p> <p>6 THE WITNESS: I don't recall.</p> <p>7 Q And the note above it for 1630, do you see</p> <p>8 that?</p> <p>9 A Yes.</p> <p>10 Q You wrote: RN and MD arrived on set to</p> <p>11 assess patient.</p> <p>12 So that's you and Dr. Kipper, correct?</p> <p>13 A Correct.</p> <p>14 Q And you wrote: Patient appeared agitated</p> <p>15 and was short towards RN.</p> <p>16 You wrote that?</p> <p>17 A According to this, yes.</p> <p>18 Q Do you believe somebody else wrote it?</p> <p>19 A No.</p> <p>20 Q Okay.</p> <p>21 A I just don't remember.</p> <p>22 Q Sure. And where you wrote "Patient</p>	<p style="text-align: right;">80</p> <p>1 many unnecessary takes when he's not feeling well.</p> <p>2 So that -- that statement was based off of</p> <p>3 what Mr. Depp's sister told you, correct?</p> <p>4 MS. MEYERS: Objection; calls for hearsay.</p> <p>5 MS. HICKOX: Join.</p> <p>6 THE WITNESS: I don't recall.</p> <p>7 Q What would you have meant by "per</p> <p>8 patient's sister"?</p> <p>9 A That I was told that by the patient's</p> <p>10 sister.</p> <p>11 Q Okay. And then you see under October 15th</p> <p>12 there's another highlighted entry, correct?</p> <p>13 A Yes.</p> <p>14 Q And you wrote, patient awake and states he</p> <p>15 slept from 2200-0430. Do you see that?</p> <p>16 A Yes.</p> <p>17 Q Patient continues to be agitated about</p> <p>18 work and is verbalizing having desire to escape</p> <p>19 with drugs.</p> <p>20 You wrote that?</p> <p>21 A It's in my notes.</p> <p>22 Q And that would mean that you wrote that</p>

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<p>1 note, correct? 2 A Correct. 3 Q And you would have written that note based 4 off Mr. Depp telling you he had a desire to escape 5 with drugs, correct? 6 MS. HICKOX: Objection; vague, it calls 7 for speculation, incomplete hypothetical. 8 MS. MEYERS: Join. 9 Q I'm sorry, did you answer that? 10 A Yes. I said I don't remember. 11 Q Okay. So where you wrote "Patient 12 continues to be agitated about work and is 13 verbalizing having desire to escape with drugs," 14 did that mean anything else than Mr. Depp telling 15 you that he had a desire to escape with drugs? 16 MS. HICKOX: Objection. 17 MS. MEYERS: Objection -- 18 MS. HICKOX: Sorry. 19 MS. MEYERS: -- leading, calls for 20 speculation, calls for hearsay. 21 Sorry. Go ahead, Cindy. 22 MS. HICKOX: Join. And asked and</p>	81	<p>1 you see at the top this is an e-mail from you to 2 Alan Blaustein copying Dr. Kipper? Do you see 3 that? 4 A I see that. 5 Q Do you recall who Dr. Blaustein is? 6 A I don't. 7 Q And then you wrote: Dr. Blaustein, per 8 your request, here is a current list of JD's 9 medications, and then there is a whole list of 10 medications. Do you see that? 11 A I do. 12 Q As of October 26, 2014, is it your 13 understanding that these were the current list of 14 medications that Mr. Depp was on? 15 A According to this paper. 16 Q And if we scroll down, you wrote: He is 17 looking forward to meeting you tomorrow. Things 18 have continued to be chaotic with his relationship 19 since he last spoke to you. 20 Do you know what you were referring to 21 there? 22 A I do not.</p>	83
<p>1 answered. 2 BY MR. NADELHAFT: 3 Q You can answer. 4 A Can you repeat -- now I forgot what I'm 5 answering. 6 Q Sure. You wrote: Patient continues to be 7 agitated about work and is verbalizing having 8 desires to escape with drugs. Could that mean 9 anything else but Mr. Depp verbalizing to you that 10 he has a desire to escape with drugs? 11 MS. MEYERS: Same objection. 12 THE WITNESS: I can only go with what my 13 notes say. I don't recall this time period. 14 Q Okay. 15 MR. NADELHAFT: Can you put up 16 Attachment 11, please. 17 (Lloyd 6, 10/26/2014 e-mail, Bates No. 18 BLAUSTEIN00000021, was marked for identification 19 and is attached to the transcript.) 20 AV TECHNICIAN: Exhibit 6. 21 Q Okay. Ms. Lloyd, I'm showing you what's 22 been marked as Exhibit 6, which is DEPP 9948. And</p>	82	<p>1 MR. NADELHAFT: We can take that down. 2 And can you put up Attachment 12, please. 3 (Lloyd 7, Text Extraction Report between 4 Depp and Lloyd, Bates No. DEPP00007861, was marked 5 for identification and is attached to the 6 transcript.) 7 AV TECHNICIAN: Exhibit 7. 8 MR. NADELHAFT: You can blow it up a 9 little bit. 10 BY MR. NADELHAFT: 11 Q Ms. Lloyd, I'm showing you what's been 12 marked as Lloyd Exhibit 7. This is another chart 13 of texts between you and Mr. Depp. And if we go 14 down to the second-to-last entry on this page -- 15 I'm sorry, it's at the top of where the screen 16 here is -- November 2, 2014, Mr. Depp wrote to 17 you: You goddamn well better, you drug hoarding 18 Bitch. And you can look up if you wanted to see 19 the message before. Feel free to look through it. 20 A Yeah, can I please start from the top, 21 please. 22 Q Yeah, no problem.</p>	84

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85	<p>1 A Okay. And this is between who? Myself</p> <p>2 and --</p> <p>3 Q 'And Mr. Depp, I understand.</p> <p>4 A Okay, you can go down a little bit.</p> <p>5 Goddamn it. Okay.</p> <p>6 Yeah, wait. Okay.</p> <p>7 Okay.</p> <p>8 Q Do you see where it's at the bottom? I</p> <p>9 don't mean to cut you off. I just --</p> <p>10 A Yeah.</p> <p>11 Q Okay. Do you know what Mr. Depp was</p> <p>12 referring to when he said, "You goddamn well</p> <p>13 better, you drug hoarding Bitch"?</p> <p>14 MS. HICKOX: Objection; calls for</p> <p>15 speculation.</p> <p>16 MS. MEYERS: Objection; calls for hearsay.</p> <p>17 Join in speculation.</p> <p>18 THE WITNESS: Looking at the text</p> <p>19 messages, it's from -- he's referring to the text</p> <p>20 above that.</p> <p>21 Q And you can go up -- scroll up. What do</p> <p>22 you mean?</p>	87	<p>1 A No.</p> <p>2 MS. HICKOX: Objection; vague.</p> <p>3 MR. NADELHAFT: Okay. You can take this</p> <p>4 down. And can you put up Attachment 13, please.</p> <p>5 (Lloyd 8, Text Extraction Report between</p> <p>6 Depp and Lloyd, Bates No. DEPP00007863, was marked</p> <p>7 for identification and is attached to the</p> <p>8 transcript.)</p> <p>9 AV TECHNICIAN: Exhibit 8.</p> <p>10 Q And this is Exhibit 8, more texts between</p> <p>11 you and Mr. Depp. Feel free to look through it.</p> <p>12 A Okay.</p> <p>13 Okay.</p> <p>14 Okay.</p> <p>15 Q Okay. So you finished?</p> <p>16 A Yup.</p> <p>17 Q All right. Looking at the second-to-last</p> <p>18 entry where it has a phone number above "Debbie</p> <p>19 Lloyd," that's your cell phone -- that's your</p> <p>20 phone number?</p> <p>21 A Yes.</p> <p>22 Q Okay. Mr. Depp wrote: I'm alright...</p>
86	<p>1 A Actually, I don't recall.</p> <p>2 Q Did you -- and then he wrote after that,</p> <p>3 Oh... That wasn't for you. My thumb -- my thumb</p> <p>4 and the friend joking... haha... Wasn't for you.</p> <p>5 I mean... Not at all.</p> <p>6 Was he joking that it wasn't -- that the</p> <p>7 text "You goddamn well better, you drug hoarding</p> <p>8 Bitch" wasn't for you or he meant to text that to</p> <p>9 somebody else?</p> <p>10 MS. MEYERS: Objection --</p> <p>11 MS. HICKOX: Objection; calls for</p> <p>12 speculation.</p> <p>13 MS. MEYERS: Calls for hearsay as well.</p> <p>14 THE WITNESS: I don't know.</p> <p>15 Q The message above it says, Kipper and</p> <p>16 Dr. Cowan on board with Erin not coming home early</p> <p>17 (tomorrow). They will talk to Amber and tell them</p> <p>18 they want her to stay. I'll keep you posted.</p> <p>19 Do you know who Dr. Cowan is?</p> <p>20 A I don't recall.</p> <p>21 Q Do you recall at all what this text chain</p> <p>22 was referring to?</p>	88	<p>1 Confused as fuck... She said nothing of last</p> <p>2 night and, most certainly, not one thing about of</p> <p>3 the exist- -- of the wrap party's existence. All</p> <p>4 the proof that I predicted last night... How will</p> <p>5 I look at her when she gets back professing her</p> <p>6 undying love... All a fucking lie... I for sure,</p> <p>7 unfortunately, wouldn't mind some company, but...</p> <p>8 I have inundated you with far too much already.</p> <p>9 Love love... Me.</p> <p>10 That's a text you received from Mr. Depp?</p> <p>11 A I don't recall.</p> <p>12 Q Do you recall Mr. Depp being upset about</p> <p>13 some wrap party that Ms. Heard had attended?</p> <p>14 A I do not.</p> <p>15 MS. MEYERS: Objection; assumes facts not</p> <p>16 in evidence, calls for hearsay.</p> <p>17 Q Did you ever recall Mr. Depp being jealous</p> <p>18 at all of Amber or -- well, I'll stop there.</p> <p>19 MS. MEYERS: Objection; vague, calls for</p> <p>20 speculation.</p> <p>21 MS. HICKOX: Join.</p> <p>22 THE WITNESS: I don't recall.</p>

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89	<p>1 Q Did you ever recall Mr. Depp being 2 suspicious that Amber was cheating on him? 3 MS. MEYERS: Objection; assumes facts not 4 in evidence, vague, calls for speculation. 5 MS. HICKOX: Join. 6 THE WITNESS: I don't recall. 7 Q At around the -- around this November 2014 8 period, how often were you seeing Mr. Depp? 9 A I don't recall. 10 Q After you got off the island with Mr. Depp 11 in -- for the detox, would you see Mr. Depp every 12 day? 13 A It varied. 14 Q What did it depend on? 15 A Schedules and needs. 16 MR. NADELHAFT: We can take that down. 17 And put up Attachment 14, please. 18 (Lloyd 9, Text Extraction Report between 19 Depp and Lloyd, Bates Nos. DEPP00007865 through 20 DEPP00007868, was marked for identification and is 21 attached to the transcript.) 22 AV TECHNICIAN: Exhibit 9.</p>	91	<p>1 A Okay. So it ends with us going over? 2 What was the last.. Oh, yeah. Perfect, come 3 over. Okay. 4 And then this, Are you guys going to see 5 Cowan, that's the first text on this next page? 6 Q Yeah. That's how it was produced to us. 7 A Okay. 8 THE WITNESS: Okay. 9 Okay. 10 MR. NADELHAFT: I think you can keep going 11 down. 12 THE WITNESS: Okay. 13 Whoops. I thought... 14 Okay. 15 Okay. 16 Okay. 17 Okay. 18 MR. NADELHAFT: All right. You can go 19 down to the end, I think. 20 THE WITNESS: Oh, wait. 21 Okay. 22 MR. NADELHAFT: And if we can look at</p>
90	<p>1 Q And this is more texts between you and 2 Mr. Depp that you can take a look through. 3 A Is there any way I can see before this so 4 I would know what referring to he -- who "he" is? 5 Q Okay. I don't have that. I can see if I 6 can get that for you. But -- well, let me ask 7 you: I'm going to actually ask a question about 8 near the bottom of it. I think I'm going to know 9 your answer given your previous testimony. 10 A Can I read all the -- can I read down 11 there? 12 Q Yeah, go ahead. 13 A Sorry. 14 Q No, no problem. 15 THE WITNESS: Okay. 16 Okay. 17 Okay. 18 MR. NADELHAFT: You can keep going. Oh, 19 I'm sorry. 20 THE WITNESS: You can keep going. 21 Oh, wait. Was this a new page? 22 Q Yeah.</p>	92	<p>1 page 3 of this, near the bottom. Keep going down, 2 please. 3 BY MR. NADELHAFT: 4 Q On November 11, 2014, Mr. Depp wrote: All 5 good. Haven't read her text yet... Am feeling so 6 fucked... Why was she at the goddamn wrap party 7 until 5 A.M.? Did Erin say anything? The lies 8 are so clear, now. They are making me nuts, 9 wondering what was so interesting to keep her 10 there that goddamn long. Please ask Erin. I must 11 have truth. I need it... It's not the easiest 12 thing to do, at this point... Though, it has been 13 a shitty and painful experience... I cannot help 14 but hear her voice begging and crying. She wants 15 to change and is going to change, etc. Help... I 16 don't know what's real and what is paranoid 17 jealousy. 18 You received that text from Mr. Depp? 19 A I don't recall. 20 Q Is this -- looking through these 21 e-mails -- or these text messages, does it refresh 22 your recollection at all about a wrap party that</p>

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1 Ms. Heard attended that Mr. Depp was concerned
 2 about?
 3 MS. MEYERS: Objection --
 4 THE WITNESS: No.
 5 MS. MEYERS: -- assumes facts not in
 6 evidence, calls for hearsay, lack of foundation.
 7 MS. HICKOX: Join.
 8 Q You may have answered while she was
 9 objecting.
 10 **A No, it doesn't refresh my memory about a**
 11 **wrap party.**
 12 Q Okay. Did you ever recall Mr. Depp not
 13 having trust in Amber?
 14 MS. MEYERS: Objection; assumes facts not
 15 in evidence, calls for hearsay, calls for
 16 speculation.
 17 MS. HICKOX: Join. Also vague.
 18 THE WITNESS: I don't recall.
 19 Q If we can go to the fourth page. You
 20 wrote at the top: I am not sure about your
 21 jealousy - but what is real that you feel you
 22 cannot trust her and you know she has not been

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1 forthcoming with the truth. You need to ask
 2 yourself if she makes you happy. Do the positives
 3 outweigh the negatives? Only you know the
 4 answers. This cannot be about her changing, is
 5 has to be about loving her for who she is - and
 6 vice versa.
 7 You wrote that to Mr. Depp?
 8 **A I don't recall.**
 9 Q And you don't recall -- did you recall
 10 ever Mr. Depp not feeling trust for Amber?
 11 MS. MEYERS: Objection; vague, calls for
 12 speculation, calls for hearsay, assumes facts not
 13 in evidence.
 14 MS. HICKOX: Join. And also asked and
 15 answered.
 16 THE WITNESS: I don't recall.
 17 MR. NADELHAFT: We can take this down.
 18 Q While you were working for Mr. Depp did he
 19 smoke marijuana?
 20 **A I don't recall.**
 21 Q Do you recall if he took any -- if not
 22 smoked marijuana, ingested marijuana in any sort

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1 of way?
 2 MS. MEYERS: Objection; calls for
 3 speculation.
 4 THE WITNESS: I don't recall.
 5 MR. NADELHAFT: Okay. Can you put up
 6 Attachment 15.
 7 (Lloyd 10, Text Extraction Report between
 8 Depp and Lloyd, Bates No. DEPP00007826, was marked
 9 for identification and is attached to the
 10 transcript.)
 11 AV TECHNICIAN: Exhibit 10.
 12 Q You can take a look through this. This is
 13 one page. Again, texts with you and Mr. Depp.
 14 The one I want to ask you about is just -- you
 15 wrote on the fourth entry: Okay - you're right.
 16 I know you don't want to hear this - but, maybe
 17 try to cut back a little on the MJ. Kipper says
 18 it could be a part of the cause. Something about
 19 increasing acid in your stomach.
 20 That's what I'm going to ask you about.
 21 If you want to read through it, feel free.
 22 **A Okay.**

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1 Q Do you need to read the rest?
 2 **A No, I'm okay.**
 3 Q Okay. The text where you wrote "Okay -
 4 you're right. I know you don't want to hear this
 5 - but, maybe try to cut back a little on the MJ.
 6 Kipper says it could be part of the cause.
 7 Something about increasing acid in your stomach,"
 8 that's a text you wrote to Mr. Depp?
 9 **A I don't recall.**
 10 Q In that column where it's your name,
 11 that's your number above the name?
 12 **A Yes.**
 13 Q Okay. Does "MJ" refer to marijuana?
 14 **A "MJ" is initials for marijuana.**
 15 Q Is it typical when a person is attempting
 16 to detox from drugs to still be taking marijuana?
 17 MS. MEYERS: Objection; calls for expert
 18 testimony, calls for speculation.
 19 MS. HICKOX: Join. Also vague, incomplete
 20 hypothetical, lacks foundation.
 21 MS. MEYERS: Join.
 22 Q You can answer.

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97	<p>1 A Every detox is different.</p> <p>2 Q So you worked with other patients where it</p> <p>3 was permitted for them to continue to take</p> <p>4 marijuana while they were detoxing from other</p> <p>5 drugs?</p> <p>6 A Do I have to answer other patients'</p> <p>7 information?</p> <p>8 Q You don't have to give me specific --</p> <p>9 yeah, I'm not looking for any names or details</p> <p>10 other than that.</p> <p>11 A Again, every patient's different.</p> <p>12 Q Can you think of another instance where</p> <p>13 there was a patient -- without giving me the</p> <p>14 patient's name or information, where they were</p> <p>15 allowed to continue to take marijuana while</p> <p>16 detoxing from other drugs?</p> <p>17 A I don't recall.</p> <p>18 MR. NADELHAFT: Okay. We can take that</p> <p>19 down.</p> <p>20 Q In working with Mr. Depp, did there ever</p> <p>21 come times where Mr. Depp seemed confused?</p> <p>22 MS. MEYERS: Objection; vague as to</p>	99	<p>1 Q And this is a text message between you and</p> <p>2 Amber starting on December 26, 2014. Do you see</p> <p>3 that?</p> <p>4 A Yes.</p> <p>5 Q Okay. And you understand that you're in</p> <p>6 the -- the texts from you are the blue, correct?</p> <p>7 A Okay.</p> <p>8 Q All right. You wrote: Sorry to bother</p> <p>9 you. Is JD up? He has an important appointment</p> <p>10 at 2 p.m. and he isn't responding to me. Hope you</p> <p>11 guys had a beautiful Christmas.</p> <p>12 And Amber wrote: Hey there. Yes he is.</p> <p>13 He's opening presents with Lily Rose. What</p> <p>14 appointment? Is he being picked up?</p> <p>15 Who's Lily Rose?</p> <p>16 A Johnny's daughter.</p> <p>17 Q Okay. And we go to the next page. And</p> <p>18 you see, I guess, because it was -- the way it was</p> <p>19 copied, some of the message from the last is now</p> <p>20 on the second page.</p> <p>21 And then you wrote: I think Dave</p> <p>22 (security) is taking him. He should leave in</p>
98	<p>1 "confused."</p> <p>2 MS. HICKOX: Join.</p> <p>3 THE WITNESS: Can you clarify in what</p> <p>4 regards?</p> <p>5 BY MR. NADELHAFT:</p> <p>6 Q Sure. And we'll just look at a document.</p> <p>7 That's fine.</p> <p>8 MR. NADELHAFT: Let's just go -- can we</p> <p>9 put up Attachment 17.</p> <p>10 AV TECHNICIAN: Please stand by.</p> <p>11 (Lloyd 11, Text message chain between</p> <p>12 Heard and Lloyd, Bates Nos. LLOYD 000002 through</p> <p>13 LLOYD 000005, was marked for identification and is</p> <p>14 attached to the transcript.)</p> <p>15 AV TECHNICIAN: Exhibit 11.</p> <p>16 Q Okay. We'll just go through this</p> <p>17 together. Exhibit 11 is LLOYD 2 through 5. Do</p> <p>18 you recall producing documents in this matter?</p> <p>19 A Yes.</p> <p>20 Q And you produced text messages with</p> <p>21 Mr. Depp and with Ms. Heard?</p> <p>22 A Yes.</p>	100	<p>1 15 minutes. Remind him it's Dr. Schoen.</p> <p>2 Do you see that?</p> <p>3 A I do.</p> <p>4 Q Do you know who Dr. Schoen is?</p> <p>5 A I don't recall.</p> <p>6 Q Okay. And then Amber wrote: He's still</p> <p>7 opening presents with Lily Rose and says he wants</p> <p>8 to push it an hour or so. Is that possible? He</p> <p>9 was texting someone to see he could but I'm not</p> <p>10 sure he finished it. He's super stoned.</p> <p>11 Did you receive that text from Amber?</p> <p>12 MS. MEYERS: Objection; calls for hearsay.</p> <p>13 THE WITNESS: According to this, yes.</p> <p>14 Q Did you receive -- yes, you received the</p> <p>15 text?</p> <p>16 A According to what this shows. I don't</p> <p>17 recall.</p> <p>18 Q You don't have any understanding as to</p> <p>19 what was meant by "super stoned"?</p> <p>20 MS. HICKOX: Objection; calls for</p> <p>21 speculation, assumes facts not in evidence.</p> <p>22 MS. MEYERS: Join.</p>

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<p style="text-align: right;">101</p> <p>1 THE WITNESS: I wouldn't know what Amber 2 was meaning. 3 BY MR. NADELHAFT: 4 Q Did you ever see Mr. Depp super stoned 5 when you were working with him? 6 MS. MEYERS: Objection; vague as to "super 7 stoned," calls for speculation, assumes facts not 8 in evidence. 9 MS. HICKOX: Join. 10 THE WITNESS: I don't recall. 11 Q Does that mean that you never saw him 12 stoned or you just don't recall one way or the 13 other? 14 A I don't recall one way or another. 15 Q Okay. And then you wrote: I don't think 16 he can push. I will call brut md is with patients 17 till 2. Do you know what you mean by that? 18 A Typo. But no. 19 Q No? Okay. 20 Let's just go to the next page. And then 21 Amber wrote: Damn. He's still with Lily Rose and 22 can't leave.</p>	<p style="text-align: right;">103</p> <p>1 January 18, 2015? 2 A Yes. 3 Q Okay. And in the gray it writes: Hey 4 Debbie, it's Whit. I'm with Amber and she wanted 5 me to let you know that she's going to call you in 6 a bit. 7 Do you know who the Whitney is? 8 A Amber's sister. 9 Q And you wrote: Okay. I am here waiting 10 to have a few minutes alone with JD. I am trying 11 to piece together last night. Anything you guys 12 can tell me to help? I was with him until about 13 12:45 a.m. and he had taken his -- 14 MR. NADELHAFT: Can you go on to the next 15 page. 16 Q -- taken his bedtime meds when I left. 17 You wrote that text? 18 A According to this. 19 Q Okay. And it sounds like you don't recall 20 what you're referring to in that text message. 21 A I don't recall. 22 Q And then the response is: Hey texted her</p>
<p style="text-align: right;">102</p> <p>1 And then you wrote: I rescheduled 2 appointment and let JD know. I hope you guys are 3 having a lovely holiday. Miss ya. 4 So you would schedule appointments for 5 Mr. Depp? 6 A Some appointments, yes. 7 Q Okay. Some medical appointments is what 8 I'm referring to, right? 9 A Correct. 10 Q Okay. That's all I have for this text. I 11 mean, if you want to keep looking... 12 MR. NADELHAFT: Now can we put up 13 Attachment 18, please. 14 (Lloyd 12, Text message chain between 15 Amber Heard/Whitney Heard and Lloyd, Bates Nos. 16 LLOYD 000006 through LLOYD 000014, was marked for 17 identification and is attached to the transcript.) 18 AV TECHNICIAN: Exhibit 12. 19 Q Ms. Lloyd, this is Exhibit 12. It's more 20 texts that you produced in this matter, and it's 21 LLOYD 6 through 14. 22 And you see the text that starts</p>	<p style="text-align: right;">104</p> <p>1 some pretty cryptic messages at around 2:30 or 2 so... Saying things like, quote, baby, come back 3 to the room, end quote, and "I hate being away 4 from you guys, end quote. Things that didn't 5 really make sense. 6 You received that text? 7 A I don't recall. 8 Q And then you wrote: He seemed confused 9 this morn. Like he thought she was here last 10 night. I am concerned... He is in shower and I 11 am going to try to talk to him alone when he is 12 dressed and ready. 13 You wrote that text message? 14 A I don't recall. 15 Q The text message came from your phone? 16 A According to this. 17 Q You produced this, right? 18 A I'd say yes. 19 Q And so do you know what you were referring 20 to where you said, He seemed confused this 21 morning? 22 A I don't recall.</p>

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<p style="text-align: right;">105</p> <p>1 Q Okay. And then Amber wrote -- well, it</p> <p>2 says -- then the next thing says, from Amber: The</p> <p>3 confusion thing isn't new. I've been thinking</p> <p>4 when it's been really bad that it was just like an</p> <p>5 Ambien trip. But apparently he took something</p> <p>6 else because this is a new level.</p> <p>7 You received that text?</p> <p>8 A I don't recall.</p> <p>9 Q Okay. And then you wrote: I am with him</p> <p>10 right now. He thinks they had a fight and when he</p> <p>11 woke up on the couch he was confused and sent that</p> <p>12 text. But now he's wondering if they did fight or</p> <p>13 if he was dreaming.</p> <p>14 You wrote that text?</p> <p>15 A I don't recall.</p> <p>16 Q Okay. And that was a text that came from</p> <p>17 your phone, correct?</p> <p>18 A Correct.</p> <p>19 Q And do you recall any time where Mr. Depp</p> <p>20 seemed confused about something that had occurred?</p> <p>21 A I don't.</p> <p>22 Q Okay. Did you ever recall Mr. Depp</p>	<p style="text-align: right;">107</p> <p>1 else? (Ie meds you and Kipper did not give him?)</p> <p>2 because if that's the case then we should worry.</p> <p>3 He's an addict. It's why you're there in his</p> <p>4 life. If he's hiding things from you then we</p> <p>5 absolutely should worry - and shouldn't be</p> <p>6 shrugging it off. Not to be cliché, but it's a</p> <p>7 slippery slope.</p> <p>8 You received that text?</p> <p>9 A I don't recall.</p> <p>10 Q That text was on your phone, correct?</p> <p>11 A Correct. I didn't review these, I just</p> <p>12 sent them over.</p> <p>13 Q There's no reason to believe these texts</p> <p>14 were not on your phone, right?</p> <p>15 A No.</p> <p>16 Q Okay. Keep going. And then you wrote on</p> <p>17 January 18, 2015: He just finished press</p> <p>18 conference and did an amazing job. He was</p> <p>19 present, on and witty. Being with him for a few</p> <p>20 days I realize he is not always taking his</p> <p>21 prescribed meds as he should. I am finding</p> <p>22 containers with pills that he should've taken and</p>
<p style="text-align: right;">106</p> <p>1 wondering if he and Amber had had a fight or if he</p> <p>2 was dreaming?</p> <p>3 A I don't recall.</p> <p>4 Q Then you write: I think everything is</p> <p>5 okay. He had taken his bedtime meds and fell</p> <p>6 asleep on the couch and thought you were all</p> <p>7 together. He had left his phone in the car on the</p> <p>8 way back from dinner last night and thought Amber</p> <p>9 was mad since he hadn't called. He is able to</p> <p>10 make sense of it all and I don't think we need to</p> <p>11 be concerned.</p> <p>12 Does this refresh your recollection at</p> <p>13 all?</p> <p>14 A It does not.</p> <p>15 Q Okay. And it's a text you wrote, though,</p> <p>16 correct?</p> <p>17 A I don't recall.</p> <p>18 Q And then you received a text that says,</p> <p>19 This is me. I'm so confused. We didn't fight. I</p> <p>20 just didn't hear from him last night. We promised</p> <p>21 each other we would talk. He never called.</p> <p>22 Also - are you saying he didn't take something</p>	<p style="text-align: right;">108</p> <p>1 I think at other times he might forget and take</p> <p>2 double doses. I am going to keep a closer eye on</p> <p>3 things and give him meds one or two days at a time</p> <p>4 so I can monitor them more closely. At this time</p> <p>5 I am not concerned.</p> <p>6 You wrote that text message?</p> <p>7 A I don't recall.</p> <p>8 Q Do you recall Mr. Depp ever not taking the</p> <p>9 medications he was prescribed?</p> <p>10 A Yes.</p> <p>11 Q Do you recall Mr. Depp sometimes</p> <p>12 potentially doubling the medications that he was</p> <p>13 prescribed?</p> <p>14 MS. MEYERS: Objection; calls for</p> <p>15 speculation, assumes facts not in evidence.</p> <p>16 MS. HICKOX: Join.</p> <p>17 THE WITNESS: I recall thinking that at</p> <p>18 times.</p> <p>19 Q Did you ever -- okay.</p> <p>20 And then Amber wrote: Okay. So no</p> <p>21 mystery pills found that didn't come you through</p> <p>22 [sic].</p>

<p style="text-align: right;">109</p> <p>1 You received that text?</p> <p>2 A I don't recall.</p> <p>3 Q Okay. What made you think at times that</p> <p>4 Mr. Depp had overtaken his medications?</p> <p>5 MS. HICKOX: Objection; calls for</p> <p>6 speculation. Also object to the extent it</p> <p>7 misstates prior testimony.</p> <p>8 MS. MEYERS: Join.</p> <p>9 THE WITNESS: I don't recall saying that I</p> <p>10 thought he overtook his medications.</p> <p>11 Q I think you said you thought he doubled</p> <p>12 his medications; is that right?</p> <p>13 A The text stated that at times I think he</p> <p>14 misses a dose and then at other times he might</p> <p>15 take an extra dose.</p> <p>16 Q And then you said you thought that. What</p> <p>17 would give you the thinking that he did take an</p> <p>18 extra dose?</p> <p>19 A I don't remember why I thought that at the</p> <p>20 time.</p> <p>21 Q Okay. Do you recall --</p> <p>22 A I know that I would think that he wouldn't</p>	<p style="text-align: right;">111</p> <p>1 as you know him best. See you tomorrow.</p> <p>2 You wrote that text message?</p> <p>3 A I don't recall.</p> <p>4 Q Would you agree that Ms. -- that Amber</p> <p>5 showed concern for Mr. Depp?</p> <p>6 MS. MEYERS: Objection; vague as to</p> <p>7 "concern," calls for speculation.</p> <p>8 Q You can answer.</p> <p>9 A What was the question?</p> <p>10 Q Would you agree that Amber showed concern</p> <p>11 for Mr. Depp?</p> <p>12 MS. MEYERS: Same objection.</p> <p>13 THE WITNESS: Yeah, I don't remember.</p> <p>14 Q You don't remember at all if Amber was at</p> <p>15 any time concerned about Mr. Depp?</p> <p>16 MS. MEYERS: Same objection. Asked and</p> <p>17 answered.</p> <p>18 MS. HICKOX: Join. Also argumentative.</p> <p>19 THE WITNESS: I don't -- I don't remember.</p> <p>20 Q Okay. Did you believe that Ms. Heard</p> <p>21 wanted Mr. Depp to detox off of drugs?</p> <p>22 MS. MEYERS: Objection.</p>
<p style="text-align: right;">110</p> <p>1 take meds because I would take the med boxes and</p> <p>2 there would be pills left in them.</p> <p>3 Q Okay. And then you wrote: I found</p> <p>4 Adderall that I had not given him, but it was old</p> <p>5 and expired. No mystery pills.</p> <p>6 You wrote that text?</p> <p>7 A I don't recall.</p> <p>8 Q And we all looked through everything this</p> <p>9 morning since we were searching for his phone.</p> <p>10 You wrote that text?</p> <p>11 A I don't recall.</p> <p>12 Q Do you recall ever searching for</p> <p>13 Mr. Depp's phone?</p> <p>14 A I don't recall.</p> <p>15 Q Okay. And then Amber wrote: Okay. Thank</p> <p>16 you.</p> <p>17 Do you see that?</p> <p>18 A I see that.</p> <p>19 Q Okay. Is there anything on the last page?</p> <p>20 I don't think so.</p> <p>21 Okay. And then you wrote: I am glad you</p> <p>22 reached out. I always want to hear your concerns</p>	<p style="text-align: right;">112</p> <p>1 MS. HICKOX: Objection; calls for</p> <p>2 speculation, vague, calls for hearsay, lacks</p> <p>3 foundation.</p> <p>4 MS. MEYERS: Join.</p> <p>5 THE WITNESS: I don't know what went on in</p> <p>6 Amber's mind.</p> <p>7 BY MR. NADELHAFT:</p> <p>8 Q Did you believe that Mr. Depp wanted to</p> <p>9 detox off of drugs?</p> <p>10 MS. HICKOX: Same objections.</p> <p>11 THE WITNESS: Yes.</p> <p>12 MS. MEYERS: Objection.</p> <p>13 Q What was your answer?</p> <p>14 A Yes.</p> <p>15 Q And how did Mr. D -- how did Mr. Depp show</p> <p>16 you that?</p> <p>17 MS. HICKOX: Objection; calls for</p> <p>18 speculation, lacks foundation.</p> <p>19 MS. MEYERS: Objection; vague. And join</p> <p>20 in the others.</p> <p>21 THE WITNESS: It was on his own free will</p> <p>22 that he hired us to be with him.</p>

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<p>1 Q And then did Mr. Depp have any relapses 2 with drugs when you were working with him? 3 A I don't recall. 4 Q You don't recall if he had any relapses at 5 all during the time you worked with him? 6 MS. MEYERS: Objection; vague as to 7 relapse, foundation, assumes facts not in 8 evidence. 9 MS. HICKOX: Join. And also calls for an 10 expert opinion, calls for speculation. 11 MS. MEYERS: Join. 12 Q Do you have an answer? 13 A I -- no. 14 Q Do you know what you're answering? 15 A If I recall any relapses. 16 Q And you don't -- and your answer is you 17 don't recall any relapses of Mr. Depp taking -- is 18 it -- okay. Let me ask you -- it might be 19 clearer. Do you recall Mr. Depp ever relapsing on 20 opiates? 21 A No. 22 Q Do you recall Mr. Depp, in working with</p>	<p>113</p>	<p>1 Q Okay. Do you have any reason to believe 2 the drug test would be wrong if it showed he did 3 test positive for cocaine? 4 MS. HICKOX: Objection; calls for 5 speculation, violates best evidence rule, attempts 6 to establish contents of documents through oral 7 testimony, vague. 8 MS. MEYERS: Also calls for expert 9 opinion. 10 Q You can answer. 11 A What -- do I have any -- what was the 12 question? 13 Q Do you have any reason -- if drug tests 14 showed that Mr. Depp was positive for cocaine, do 15 you have any reason to believe the drug tests were 16 not correct? 17 MS. HICKOX: Same objections. Also 18 incomplete hypothetical. 19 MS. MEYERS: Same objections. Join. 20 THE WITNESS: In my professional opinion, 21 drug tests can be wrong. 22 Q Did you believe any of Mr. Depp's drug</p>	<p>115</p>
<p>1 him, ever take cocaine? Not that you necessarily 2 saw him, but that you understood that he -- that 3 he took cocaine. 4 MS. HICKOX: Objection -- 5 MS. MEYERS: Objection -- 6 MS. HICKOX: -- calls for speculation, 7 calls for hearsay, assumes facts not in evidence. 8 MS. MEYERS: Join. 9 THE WITNESS: I -- I never saw Mr. Depp 10 use cocaine. 11 Q Did you have any understanding that 12 Mr. Depp took cocaine whether you saw it or not? 13 MS. HICKOX: Same objections. 14 MS. MEYERS: Same. Join. 15 THE WITNESS: I don't recall. 16 Q Did you administer drug tests to Mr. Depp? 17 A In the beginning. 18 Q Did you see the results of the drug tests? 19 A Yes. 20 Q Did you see Mr. Depp being positive for 21 taking cocaine? 22 A I don't recall.</p>	<p>114</p>	<p>1 tests were wrong? 2 A I don't recall his results. 3 MR. NADELHAFT: All right. Why don't we 4 take another break. We've gone about an hour -- 5 another hour. 6 MS. HICKOX: All right. 7 THE VIDEOGRAPHER: The time is 2:17 p.m. 8 We are going off the record. 9 (Recess was held.) 10 THE VIDEOGRAPHER: The time is 2:30 p.m. 11 We're now back on the record. 12 MR. NADELHAFT: Catherine, can you put up 13 Attachment 19, please. 14 AV TECHNICIAN: Please stand by. 15 (Lloyd 13, Text message chain between 16 Amber Heard/Whitney Heard and Lloyd, Bates Nos. 17 LLOYD 000014 through LLOYD 000021, was marked for 18 identification and is attached to the transcript.) 19 AV TECHNICIAN: Exhibit 13. 20 BY MR. NADELHAFT: 21 Q Okay. Dr. -- Ms. Lloyd, welcome back. 22 I'm making you a doctor. Congratulations. I know</p>	<p>116</p>

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<p style="text-align: right;">117</p> <p>1 you probably do much more than doctors, but...</p> <p>2 Ms. Lloyd, welcome back. I'm showing you</p> <p>3 what's been marked as Lloyd Exhibit 13. It's a --</p> <p>4 basically, a continuation of the text messages you</p> <p>5 were just looking at. On January 19th -- and it's</p> <p>6 LLOYD 14 through 21. On January 19, 2015, it's a</p> <p>7 text you received from Amber that says, Hey there.</p> <p>8 Can we speak today?</p> <p>9 Do you see that?</p> <p>10 A Yup.</p> <p>11 Q All right. And then you wrote: Yes. I</p> <p>12 am not sure when/if I'll be around him. How was</p> <p>13 he this morn? I heard there was some chaos last</p> <p>14 night. You okay?</p> <p>15 You wrote that message to Amber?</p> <p>16 A According to this.</p> <p>17 Q And, again, this message came from your</p> <p>18 phone, correct?</p> <p>19 A Correct.</p> <p>20 Q Go to the next page. And Amber wrote to</p> <p>21 you on January 19, 2015: Yeah. We fought last</p> <p>22 night. I brought up that I need him to honor</p>	<p style="text-align: right;">119</p> <p>1 falling sleep on the bathroom floor. I'm worried.</p> <p>2 It's not just because we fought last night. This</p> <p>3 obviously happened the night before too. And I</p> <p>4 have noticed this kind of delirium popping up</p> <p>5 occasionally recently.</p> <p>6 You received those text messages from</p> <p>7 Amber?</p> <p>8 MS. MEYERS: Objection; calls for hearsay.</p> <p>9 THE WITNESS: According to this I did.</p> <p>10 Q Okay. And, again, these were texts that</p> <p>11 were on your phone, correct?</p> <p>12 A Yes.</p> <p>13 Q Okay. And Amber was reporting to you that</p> <p>14 Mr. Depp was confused and slurring his -- slurring</p> <p>15 his words?</p> <p>16 MS. MEYERS: Objection.</p> <p>17 MS. HICKOX: Objection; calls for --</p> <p>18 MS. MEYERS: Go ahead.</p> <p>19 MS. HICKOX: Objection; calls for</p> <p>20 speculation, misstates the contents of the</p> <p>21 document, assumes facts not in evidence, vague,</p> <p>22 compound.</p>
<p style="text-align: right;">118</p> <p>1 his/our promise we made to talk every day. And</p> <p>2 now in the short two days we were apart, he</p> <p>3 couldn't make even one call. So of course, we</p> <p>4 fought. But that's not why I'm texting - I'm</p> <p>5 concerned about something. Last night, at one</p> <p>6 point, he started acting confused, disoriented.</p> <p>7 Aggressive and was really slurring - like</p> <p>8 unintelligible slurring. Then he passed out on</p> <p>9 the floor. When I realized he was fucked up, that</p> <p>10 was the end of the night [sic] of course but it</p> <p>11 was not just Ambien. I promise you. It lasted</p> <p>12 way longer than the Ambien sleep-window would</p> <p>13 account for and I've been with him post Ambien</p> <p>14 many times - it's not like this. Last night he</p> <p>15 admitted he took Xanax - probably a lot.</p> <p>16 leep-window would account for and I've</p> <p>17 been with him -- oh.</p> <p>18 Probably a lot. I'm worried about the</p> <p>19 mix. And it becoming habitual/abusive. He slips</p> <p>20 down the proverbial slope very quickly. He was so</p> <p>21 out of it that his lit cigarette fell down his</p> <p>22 shirt without him realizing it... Not to mention</p>	<p style="text-align: right;">120</p> <p>1 MS. MEYERS: Calls for hearsay. Join in</p> <p>2 all the others.</p> <p>3 BY MR. NADELHAFT:</p> <p>4 Q Did Ms. -- Amber reported to you that</p> <p>5 Mr. Depp was acting confused and disoriented?</p> <p>6 MS. MEYERS: Same objections.</p> <p>7 MS. HICKOX: Join.</p> <p>8 THE WITNESS: What she reported was what</p> <p>9 the text states. I don't recall anything outside</p> <p>10 of that.</p> <p>11 Q And then you responded: Typically, I do</p> <p>12 not [sic] leave him with more than a few Xanax at</p> <p>13 a time for that reason. I replenished them</p> <p>14 yesterday morn so I will be able to see how many</p> <p>15 he took. It might be too much when he mixes with</p> <p>16 the Ambien. Kipper is aware of the confusion and</p> <p>17 we are cutting back on his bedtime meds. As far</p> <p>18 as the amount of Xanax he takes - he has been</p> <p>19 using them responsibly, not abusing them. I heard</p> <p>20 he was really slurry and out of it last night. I</p> <p>21 wanted to see him but by the time I was made aware</p> <p>22 of the situation he was asleep.</p>

<p style="text-align: right;">121</p> <p>1 You wrote that text message?</p> <p>2 A According to this.</p> <p>3 Q Do you recall Dr. Kipper being aware of</p> <p>4 Mr. Depp having confusion at times?</p> <p>5 MS. MEYERS: Objection; lack of</p> <p>6 foundation, calls for speculation, calls for</p> <p>7 hearsay.</p> <p>8 MS. HICKOX: Join.</p> <p>9 THE WITNESS: I don't recall other -- I</p> <p>10 mean, outside of what this text says.</p> <p>11 Q Okay. Do you recall there being any</p> <p>12 issues with the mix of medications that was being</p> <p>13 prescribed to Mr. Depp?</p> <p>14 MS. MEYERS: Objection; vague as to issue.</p> <p>15 MS. HICKOX: Join. Also calls for</p> <p>16 speculation, expert opinion.</p> <p>17 MS. MEYERS: Join.</p> <p>18 THE WITNESS: I don't recall.</p> <p>19 Q Do you recall Dr. Kipper cutting back on</p> <p>20 Mr. Depp's bedtime medications?</p> <p>21 A I don't recall.</p> <p>22 Q You wrote: I heard he was really slurry</p>	<p style="text-align: right;">122</p> <p>1 and out of it last night.</p> <p>2 Do you recall who you heard that from?</p> <p>3 A I do not.</p> <p>4 Q I assume you have no recollection of where</p> <p>5 you were with Mr. Depp at the time.</p> <p>6 A I do not.</p> <p>7 Q Then Amber wrote: Okay. Good. I'm glad</p> <p>8 you're watching it. Thank you.</p> <p>9 You received that text message, correct?</p> <p>10 A According to this, yes.</p> <p>11 Q Next page.</p> <p>12 And then Amber wrote: Yeah - it's</p> <p>13 probably the mix. And when faced with stress</p> <p>14 (even of the non-fighting variety) he runs to</p> <p>15 escape. And recently it's had a dramatic effect.</p> <p>16 He was straight up talking to people who weren't</p> <p>17 there last night. And he thought we were at home</p> <p>18 in LA. Which is obviously what happened the night</p> <p>19 before to whatever extent. But thank you for</p> <p>20 watching and keeping Kipper updated. He drives me</p> <p>21 crazy but he's --</p> <p>22 MR. NADELHAFT: Go to the next page.</p>
<p style="text-align: right;">123</p> <p>1 Q -- but he's my whole life.</p> <p>2 You received that text message from Amber?</p> <p>3 A According to this.</p> <p>4 Q And, again, this text message was</p> <p>5 something that was on your phone?</p> <p>6 A Yes.</p> <p>7 Q Okay. Was Amber instructed to inform you</p> <p>8 or Dr. Kipper if Mr. Depp was having any issues</p> <p>9 with his medications?</p> <p>10 MS. HICKOX: Objection; calls for</p> <p>11 speculation, vague, compound, assumes facts.</p> <p>12 MS. MEYERS: Join.</p> <p>13 THE WITNESS: I don't recall. Amber was</p> <p>14 not my patient.</p> <p>15 Q Did you ever talk with Amber about what</p> <p>16 she should do if Mr. Depp was having problems with</p> <p>17 the medications he was being prescribed?</p> <p>18 MS. MEYERS: Objection; vague as to</p> <p>19 "problems," calls for hearsay, calls for</p> <p>20 speculation.</p> <p>21 THE WITNESS: I don't recall.</p> <p>22 MR. NADELHAFT: Okay. We can take this</p>	<p style="text-align: right;">124</p> <p>1 down.</p> <p>2 Q Do you recall accompanying Mr. Depp to</p> <p>3 Australia?</p> <p>4 A Yes.</p> <p>5 Q Okay. And do you recall accompanying</p> <p>6 Mr. Depp to Australia in around March of 2015?</p> <p>7 A I don't remember dates.</p> <p>8 Q Do you recall accompanying Mr. Depp to</p> <p>9 Australia when he was filming Pirates of the</p> <p>10 Caribbean 5?</p> <p>11 A I do.</p> <p>12 Q Okay. Who -- where were you staying in</p> <p>13 Australia in relation to Mr. Depp?</p> <p>14 A Distance-wise?</p> <p>15 Q Yeah. How far away were you from him?</p> <p>16 A About 30 minutes.</p> <p>17 Q Okay. And where was Mr. Depp staying?</p> <p>18 A In a rental house.</p> <p>19 Q And where were you staying?</p> <p>20 A In an apartment.</p> <p>21 Q And what city were you in?</p> <p>22 A I don't recall the name.</p>

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<p>1 Q And was Dr. Kipper there with you? 2 A He came and went. 3 Q Did you fly to Australia with Mr. Depp? 4 A Sometimes I did, and other times I flew on 5 a -- commercial. 6 Q Okay. 7 MR. NADELHAFT: Can we put up 8 Attachment 39, please. 9 AV TECHNICIAN: Please stand by. And, 10 Counsel, this has already been previously marked. 11 Would you like me to mark it again? 12 MR. NADELHAFT: Yeah, please. 13 (Lloyd 14, 3/1/2015 e-mail chain, Bates 14 Nos. DEPP00001636 and DEPP00001637, was marked for 15 identification and is attached to the transcript.) 16 AV TECHNICIAN: Exhibit 14. 17 Q Ms. Lloyd, Lloyd 14 is an e-mail between 18 Dr. Kipper and Dr. Blaustein, and I just wanted to 19 ask you a question to see if you have memory of 20 this. 21 If we go down to the second page, 22 Dr. Blaustein writes on March 1, 2015: I've been</p>	<p>125</p> <p>1 A I don't recall anything around that time. 2 Q Okay. And if we go up this e-mail a bit, 3 Dr. Kipper writes, on March 1, 2015, in the second 4 paragraph: J is in some trouble and I have been 5 in touch with the camp in Australia and his sister 6 at home. Debbie is worried and somewhat exhausted 7 and he is doing what he wants since his friend 8 Marilyn Manson is there visited with -- is there 9 visiting. 10 Do you see that? 11 A Uh-huh, I do. 12 Q Do you have an understanding as to what 13 Mr. Depp was doing with Marilyn Manson? 14 A I do not. 15 MS. MEYERS: Objection; calls for 16 speculation. 17 MS. HICKOX: Objection. 18 Q Did you say "I do not"? 19 A I do not. 20 Q Okay. Do you recall -- does this help 21 refresh your recollection as to why you were 22 worried about Mr. Depp as of March 1, 2015?</p>
<p>1 in touch with Debbie in Australia about J and it 2 doesn't sound like he's doing very well. Thought 3 it might be a good idea to talk and see if there's 4 anything we can do to help. I've offered to speak 5 with him but, so far, he hasn't set up anything 6 with me. I last spoke to him in mid-January, so 7 I'm way behind on what's going on with him. 8 Do you recall talking to Dr. Blaustein 9 about Mr. Depp in Australia? 10 A I do not. 11 Q Do you recall Mr. Depp not doing very well 12 while he was in Australia? 13 MS. MEYERS: Objection; vague as to "not 14 doing very well." 15 MS. HICKOX: Join. And also calls for 16 speculation, lacks foundation -- 17 MS. MEYERS: Join. 18 MS. HICKOX: -- assumes facts. 19 THE WITNESS: Can you clarify by -- what 20 you mean by "not doing very well"; and at what 21 time in Australia? 22 Q Well, as of March 1, 2015.</p>	<p>126</p> <p>1 A It does not. 2 Q Did you ever tell Dr. Kipper that Mr. Depp 3 was doing what he wants with Marilyn Manson? 4 MS. MEYERS: Objection; calls for hearsay. 5 THE WITNESS: I don't recall. 6 Q Do you recall Marilyn Manson being in 7 Australia with Mr. Depp? 8 A I do not. 9 Q It says, Debbie is worried and somewhat 10 exhausted. 11 Do you recall being exhausted while in 12 Australia and working with Mr. Depp? 13 A I do not. 14 Q Do you have any reason to believe that 15 what Dr. Kipper wrote is not true? 16 A I do not. 17 MR. NADELHAFT: We can take this down. 18 And go back to Exhibit 1. And if we can go to 19 Kipper 157. 20 Q Which, Ms. Lloyd, is -- it should be a 21 March 7, 2015 date. Are you there? 22 A No. On mine I don't have the date -- I</p>
<p>127</p>	<p>128</p>

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129	<p>1 mean, the year ending on some of these. I think</p> <p>2 I'm...</p> <p>3 Q If you want, you can just -- we can -- you</p> <p>4 can just look at the screen.</p> <p>5 A I just found 1/3/15. What are we on?</p> <p>6 Q 3/7/15.</p> <p>7 A 3/7. 3/8. Okay.</p> <p>8 Q You see 3/7/15?</p> <p>9 A I do.</p> <p>10 Q Before I ask, do you recall how long you</p> <p>11 were in Australia with Mr. Depp?</p> <p>12 A No. However long the filming of Pirates</p> <p>13 was.</p> <p>14 Q And at 3/7/15 at 1130 you wrote: MD</p> <p>15 received a text message from client that he had</p> <p>16 been arguing with wife and that he had cut his</p> <p>17 finger. According to patient his assistant and</p> <p>18 security were on their way to pick him up.</p> <p>19 You wrote that?</p> <p>20 A According to my notes, yes.</p> <p>21 Q Is there any reason to believe you didn't</p> <p>22 write that note?</p>	131	<p>1 Q What did the house look like?</p> <p>2 A It was a mess.</p> <p>3 Q And can you describe how it was a mess.</p> <p>4 A I don't remember details, but I remember</p> <p>5 there was some writing on the wall and I remember</p> <p>6 a smashed TV.</p> <p>7 Q Do you remember what any of the writing</p> <p>8 said on the wall?</p> <p>9 A I do not.</p> <p>10 Q And you said you recalled a smashed TV?</p> <p>11 A Yes.</p> <p>12 Q Okay. Do you recall, was Amber in the</p> <p>13 house?</p> <p>14 A I don't recall.</p> <p>15 Q Do you recall seeing Amber that day?</p> <p>16 A No, I don't recall.</p> <p>17 Q Do you recall what rooms you went through</p> <p>18 of the house, Mr. Depp's house?</p> <p>19 A I remember looking for his finger in the</p> <p>20 downstairs area.</p> <p>21 Q And what was in the downstairs area -- or</p> <p>22 what rooms were in the downstairs area?</p>
130	<p>1 A No.</p> <p>2 Q Okay. Do you recall Dr. Kipper receiving</p> <p>3 a text message from Mr. Depp about Mr. Depp</p> <p>4 cutting his finger?</p> <p>5 A I don't. I don't. Just what this note</p> <p>6 says.</p> <p>7 Q Do you recall going to Mr. Depp's house</p> <p>8 after learning that he had cut his finger?</p> <p>9 A Yes.</p> <p>10 Q What do you recall about that?</p> <p>11 A That we went to the house and he -- I --</p> <p>12 actually, I don't even think I went in at first.</p> <p>13 Dr. Kipper went in and he had cut his finger and</p> <p>14 we took him to the emergency room, or his finger</p> <p>15 had been cut.</p> <p>16 Q How long were you outside the house when</p> <p>17 Dr. Kipper went in?</p> <p>18 A I don't recall, and I don't recall if I</p> <p>19 went in with him or after him.</p> <p>20 Q Do you recall what the house looked like</p> <p>21 when you went in?</p> <p>22 A Yes.</p>	132	<p>1 A It was, like, a pool table/entertainment</p> <p>2 room.</p> <p>3 Q Did you look anywhere else around the</p> <p>4 house?</p> <p>5 A I don't recall.</p> <p>6 Q What was the -- pool table/entertainment</p> <p>7 room, was that a mess?</p> <p>8 A I don't recall.</p> <p>9 Q Do you recall going into the kitchen of</p> <p>10 the house?</p> <p>11 A I don't recall.</p> <p>12 Q Do you recall finding Mr. Depp's finger?</p> <p>13 A I did not.</p> <p>14 Q Do you know who found Mr. Depp's finger?</p> <p>15 A Yes.</p> <p>16 Q Who?</p> <p>17 A Ben.</p> <p>18 Q Ben who?</p> <p>19 A I don't remember his last name.</p> <p>20 Q And who was Ben in relation to Mr. Depp?</p> <p>21 A He was, like, our house manager.</p> <p>22 Q Do you recall -- do you recall where the</p>

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<p style="text-align: right;">133</p> <p>1 finger was found?</p> <p>2 A I do not.</p> <p>3 Q Do you recall seeing Mr. Depp?</p> <p>4 A Yes.</p> <p>5 Q Can you describe what Mr. Depp was like.</p> <p>6 MS. HICKOX: Objection; vague, calls for a</p> <p>7 narrative.</p> <p>8 THE WITNESS: I don't --</p> <p>9 Q You don't -- okay. I'm sorry. I wasn't</p> <p>10 expecting -- I wasn't expecting your answer. What</p> <p>11 were you going to say?</p> <p>12 A Now I don't remember what I was answering.</p> <p>13 Q Was Mr. Depp coherent when you saw him</p> <p>14 first?</p> <p>15 MS. MEYERS: Objection; vague as to</p> <p>16 "coherent."</p> <p>17 THE WITNESS: Yeah, I just remember I</p> <p>18 think Dr. Kipper spent most of the time with him</p> <p>19 when we went in the house. I don't really recall</p> <p>20 the events of what happened.</p> <p>21 Q And did you speak to Mr. Depp at all?</p> <p>22 A I don't recall.</p>	<p style="text-align: right;">135</p> <p>1 Q Do you recall if you went with Dr. Kipper</p> <p>2 to Mr. Depp's house?</p> <p>3 A I don't recall if we drove separately or</p> <p>4 if we were driven there together.</p> <p>5 Q Did you go to the hospital with Mr. Depp?</p> <p>6 A I did, yes.</p> <p>7 Q Who else was with you when you went to the</p> <p>8 hospital?</p> <p>9 A Malcolm and Stephen.</p> <p>10 Q And who are Malcolm and Stephen?</p> <p>11 A Stephen was his assistant and Malcolm was</p> <p>12 one of his security guards.</p> <p>13 Q Do you know if Malcolm and Stephen were in</p> <p>14 the house when Mr. Depp cut his finger?</p> <p>15 A I do not know.</p> <p>16 MS. HICKOX: Objection; calls for</p> <p>17 speculation.</p> <p>18 Q Was Dr. Kipper with you at the hospital?</p> <p>19 A I don't recall.</p> <p>20 Q Did you see any doctors at the hospital to</p> <p>21 talk to them about what had happened to Mr. Depp?</p> <p>22 A I don't recall.</p>
<p style="text-align: right;">134</p> <p>1 Q Do you recall if Mr. Depp appeared to have</p> <p>2 dirt, grime, and paint on his hands?</p> <p>3 MS. MEYERS: Objection; compound.</p> <p>4 THE WITNESS: Yes, he did.</p> <p>5 Q And do you recall seeing any glass</p> <p>6 anywhere?</p> <p>7 A I do not.</p> <p>8 Q Do you recall smelling any alcohol?</p> <p>9 A I do not.</p> <p>10 Q How long were you at the house after being</p> <p>11 informed that Mr. Depp's finger was cut?</p> <p>12 A I don't recall.</p> <p>13 Q Were you -- do you know where you were</p> <p>14 when you were informed that Mr. Depp's finger was</p> <p>15 cut?</p> <p>16 A I don't recall.</p> <p>17 Q You don't recall if you were in your</p> <p>18 hotel?</p> <p>19 A I don't recall.</p> <p>20 Q Okay. Do you recall if it took you</p> <p>21 30 minutes or so to get to Mr. Depp's house?</p> <p>22 A I don't remember that morning.</p>	<p style="text-align: right;">136</p> <p>1 Q Do you recall who was holding the piece of</p> <p>2 finger that had been cut?</p> <p>3 A Ben brought it to the ER.</p> <p>4 Q What did Ben bring the finger in?</p> <p>5 A I don't recall.</p> <p>6 Q Was it on ice, the finger?</p> <p>7 A I don't recall.</p> <p>8 Q Did you ask Mr. Depp how he cut his</p> <p>9 finger?</p> <p>10 A I don't recall if I asked him.</p> <p>11 Q Did you ask anyone how Mr. Depp had cut</p> <p>12 his finger?</p> <p>13 A I don't recall.</p> <p>14 Q Do you have any understanding as to how</p> <p>15 Mr. Depp cut his finger?</p> <p>16 A I heard different stories from people.</p> <p>17 Q What were the different stories you heard?</p> <p>18 MS. HICKOX: Objection; calls for hearsay.</p> <p>19 MS. MEYERS: Join.</p> <p>20 THE WITNESS: I had heard that Amber threw</p> <p>21 a bottle of vodka at him. I had heard that he</p> <p>22 slammed it with a phone.</p>

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<p style="text-align: right;">137</p> <p>1 Q Do you recall who you heard that Amber had 2 thrown a bottle at him? 3 A I do not. 4 Q Do you recall who you heard that he 5 slammed it on -- with a phone? 6 A I do not. 7 Q Okay. Those -- the stories that you had 8 heard, did you hear it on that day of March 7th or 9 March 8th, 2015, or later? 10 A I don't remember. 11 Q Okay. Did you ever talk with Mr. Depp 12 about how he cut his finger? 13 A I don't recall conversations. 14 Q Okay. Did you ever talk with Dr. Kipper 15 about how Mr. Depp cut his finger? 16 A I don't recall specific conversations. 17 Q Did Mr. Depp -- how long was Mr. Depp in 18 the hospital for? 19 A I don't remember. 20 Q Did Mr. Depp leave Australia after the 21 incident with his finger? 22 MS. HICKOX: Objection; lacks foundation,</p>	<p style="text-align: right;">139</p> <p>1 Attachment 23, please. 2 (Lloyd 15, 3/15/2015 and 4/9/2015 e-mail 3 chain, 3/15/15 letter, Bates Nos. DEPP00001794 and 4 DEPP00001795, was marked for identification and is 5 attached to the transcript.) 6 AV TECHNICIAN: Exhibit 15. 7 BY MR. NADELHAFT: 8 Q Ms. Lloyd, I'm showing you what's been 9 marked as Exhibit 15. At the bottom there is an 10 e-mail from Dr. Kipper to you that says, Letter 11 sent today. Love you, Deb. I hope he starts 12 making good decisions. I am so sad about all 13 this. 14 Do you see that? 15 A Yes. 16 Q And it says, johnny depp termination 17 letter.docx. Do you see that? 18 A Yes. 19 Q Okay. Do you recall receiving a letter, a 20 Johnny Depp termination letter, from Dr. Kipper? 21 A I do not. 22 Q Okay. If we go to the next page. Take</p>
<p style="text-align: right;">138</p> <p>1 calls for speculation. 2 THE WITNESS: At some point. 3 BY MR. NADELHAFT: 4 Q Did Mr. Depp just continue filming after 5 he injured his finger or did he have to go home to 6 get medical attention first? 7 MS. HICKOX: Objection; lacks foundation, 8 calls for an expert opinion, calls for 9 speculation, vague. 10 MS. MEYERS: Compound. Join in the 11 others. 12 THE WITNESS: I don't remember the 13 timeline of events. 14 Q Okay. Do you recall a time shortly after 15 this incident where Dr. Kipper sent Mr. Depp a 16 letter essentially firing Mr. Depp as a patient? 17 MS. HICKOX: Objection; lacks foundation, 18 calls for speculation, calls for hearsay. 19 MS. MEYERS: Vague as to fired Mr. Depp as 20 a patient. As well join in the other objections. 21 THE WITNESS: I do not. 22 MR. NADELHAFT: Can we put up</p>	<p style="text-align: right;">140</p> <p>1 your time. You can read it. My question is: Do 2 you recall seeing this letter? 3 A Okay. 4 Q Do you recall receiving -- seeing this 5 letter? 6 A I do not. 7 Q Okay. Do you see where Dr. Kipper 8 starts -- where he writes: Johnny, I am so sorry 9 for your struggle. The events over the past 10 several days and our inability to properly monitor 11 your safety are beyond concerning and I don't feel 12 I am helping you? 13 Do you recall having -- Dr. Kipper having 14 these concerns about being able to properly 15 monitor Mr. Depp's safety? 16 MS. HICKOX: Objection; calls for 17 speculation, lacks foundation. 18 MS. MEYERS: Objection; vague, calls for 19 hearsay. 20 THE WITNESS: I don't recall as to what 21 that was regarding. 22 Q Do you recall Mr. Depp -- Dr. Kipper</p>

<p style="text-align: right;">141</p> <p>1 being -- having any uncomfort [sic] about 2 Mr. Depp's surgery? 3 MS. MEYERS: Objection; vague, vague as to 4 "uncomfort," calls for speculation, calls for 5 hearsay. 6 MS. HICKOX: Join. It also lacks 7 foundation. 8 THE WITNESS: I -- I don't recall. And I 9 wouldn't know what Dr. Kipper was thinking. 10 Q In the middle of the paragraph it says, 11 Further, the nurse supervision has also broken 12 down and this places you at a greater risk for 13 medication interactions that can prove harmful. 14 Did you have any concerns about the nurse 15 supervision of Mr. Depp? 16 A I know at times we would go days without 17 me seeing him, but I don't know specifically what 18 this is regarding. 19 Q And this is a -- this letter is a week 20 after the finger incident in Australia. Were 21 there issues with the nurse supervision while in 22 Australia?</p>	<p style="text-align: right;">143</p> <p>1 your surgical procedure. Without this assurance, 2 based on behaviors and not promises, I'm putting 3 you at risk. I refuse to put you in this 4 dangerous position. 5 Do you recall there being concerns about 6 Mr. Depp taking substances that he shouldn't have 7 been taking? 8 MS. MEYERS: Objection; vague, calls for 9 speculation, calls for hearsay -- 10 MS. HICKOX: Assumes facts -- 11 MS. MEYERS: -- lacks foundation. 12 MS. HICKOX: Join. And also assumes facts 13 not in evidence. 14 THE WITNESS: I don't recall what that was 15 regarding. 16 Q At the last -- well, at the last paragraph 17 it says, I know you told the nurse tonight that 18 you can find your own doctor and nurses, and I 19 hope this will be a better path to your health and 20 happiness. 21 Do you recall Mr. Depp telling you that he 22 was going to find his own doctor and nurses?</p>
<p style="text-align: right;">142</p> <p>1 A I don't recall specifics. 2 Q Do you see in the second paragraph it 3 says, It is with a very sad heart that I must 4 withdraw my care? You have no recollection of 5 Dr. Kipper withdrawing his care of Mr. Depp for 6 any period of time? 7 A No. I know at times it was discussed when 8 he would miss appointments, but I don't recall him 9 ever actually going through withdrawing his care. 10 Q Okay. Given the e-mail showing that you 11 received this letter, do you believe you received 12 it? 13 A I don't remember. Was there an attachment 14 on that e-mail? 15 Q Yeah, it's this. 16 A Oh, no, I just didn't know if this was 17 attached to that e-mail. But no, I don't recall 18 receiving this. 19 Q Okay. In the second paragraph it says, in 20 the middle here, What I believe you need is a 21 clear system without any substances that can 22 interfere with your medications and jeopardize</p>	<p style="text-align: right;">144</p> <p>1 A I do not. 2 Q Okay. And it says, I encourage you to at 3 least connect with Dr. Blaustein who knows -- who 4 knows you well to help you obtain another resource 5 for your continued care. 6 And you don't know who Dr. Blaustein is? 7 A I don't remember. 8 Q Okay. If we go up to the top of the 9 exhibit, top of the e-mail, on April 9, 2015, you 10 wrote: David, I couldn't sleep last night. I 11 have major concerns about leaving for Australia 12 with JD. I am not saying I won't go but every 13 part of my body is telling me it is a poor 14 decision. 15 Did you write that e-mail to Dr. Kipper? 16 A I don't recall. 17 Q Do you recall having major concerns about 18 leaving for Australia with Mr. Depp? 19 A I do not. 20 Q You don't recall having concerns in every 21 part of your body showing you it's a poor 22 decision?</p>

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1 **A I do not.**
 2 Q Do you recall if you would have written
 3 that if you were not concerned?
 4 **A No.**
 5 MS. MEYERS: Objection; calls for
 6 speculation.
 7 Q So there -- you don't recall, but you
 8 believe you must have had concerns as of April 9,
 9 2015 to travel to Australia with Mr. Depp, right?
 10 MS. MEYERS: Objection; misstates --
 11 MS. HICKOX: Objection; mischaracterizes
 12 prior -- prior testimony, calls for speculation,
 13 assumes facts.
 14 MS. MEYERS: Join.
 15 THE WITNESS: Yeah, I don't recall what my
 16 thought process was at that time.
 17 Q Going back down to the letter for a
 18 minute. In the third paragraph it says, I know
 19 you're suffering and it breaks my heart. I'll be
 20 there for you if you decide to let me back in with
 21 the boundaries I feel are necessary. I am asking
 22 our nurses to leave you a week's worth of

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1 medications to avoid any precipitous changes in
 2 your treatment. I am aware that you are now
 3 impaired, emotionally and physically, which is
 4 preventing us from being effective.
 5 Do you know what boundaries were necessary
 6 for Mr. Depp's care?
 7 MS. HICKOX: Objection; calls for
 8 speculation, calls for expert opinion, vague.
 9 MS. MEYERS: Join.
 10 THE WITNESS: I do not.
 11 Q Do you recall leaving Mr. Depp a week's
 12 worth of medications?
 13 MS. HICKOX: Objection; assumes facts.
 14 MS. MEYERS: Join.
 15 THE WITNESS: I do not. He was left
 16 medications several times, and I don't recall the
 17 specific event.
 18 Q Do you recall how Mr. Depp was impaired
 19 emotionally and physically?
 20 MS. MEYERS: Objection; assumes facts not
 21 in evidence, vague, leading, calls for
 22 speculation.

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1 MS. HICKOX: Join.
 2 THE WITNESS: I do not.
 3 MR. NADELHAFT: We can take this down.
 4 And can you put up Attachment 24, please.
 5 BY MR. NADELHAFT:
 6 Q While that's going up, Ms. Lloyd, the day
 7 that Mr. Depp cut his finger, you don't recall
 8 seeing Amber one way or the other; is that right?
 9 **A I do not.**
 10 Q Okay.
 11 (Lloyd 16, Text message chain between Depp
 12 and Lloyd, Bates Nos. LLOYD 000140 through LLOYD
 13 000145, was marked for identification and is
 14 attached to the transcript.)
 15 AV TECHNICIAN: Exhibit 16.
 16 Q All right. Exhibit 16 is LLOYD 140
 17 through 145. And Mr. Depp wrote: Take --
 18 MR. NADELHAFT: Oh, can we go up to the
 19 top, please.
 20 Q You wrote on March 17th: I am so sad
 21 about what has happened since I went home. I care
 22 about you deeply and hope this is not the end of

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1 us working together. I hope you are okay.
 2 You wrote that text to Mr. Depp?
 3 **A I don't recall.**
 4 Q Again, that text came from your phone,
 5 though?
 6 **A Yes.**
 7 Q And Mr. Depp responded: It is sad. I
 8 love you so much, Little Debbie. And, of course,
 9 Kipper too. He was right... Though, I did feel a
 10 bit of a sting when his letter (paper trail)
 11 arrived, on the off chance that I croak. Which, I
 12 also understand. Just never heard of anyone being
 13 fired by their physician before... So, I'm kinda
 14 proud of that little fact, too. I love you,
 15 kid... Even attempting saying thank you to you,
 16 would be like a monkey trying to fuck a
 17 football... It's just simply impossible. I wish
 18 things could have ended on a better note... All
 19 my love, Nurse Shark... JD.
 20 Do you recall receiving this text from
 21 Mr. Depp?
 22 **A I don't.**

<p style="text-align: right;">149</p> <p>1 Q But this text was on your phone, correct?</p> <p>2 A Correct.</p> <p>3 Q Would Mr. Depp call you Nurse Shark?</p> <p>4 A Yes.</p> <p>5 Q Would Mr. Depp call you Little Debbie?</p> <p>6 A Yes.</p> <p>7 Q And -- okay. And you don't recall</p> <p>8 Mr. Depp saying "never heard of anyone being fired</p> <p>9 by their physician before"?</p> <p>10 A I do not.</p> <p>11 Q Okay. And then you respond on the next</p> <p>12 page: I love you too and hope this is not the</p> <p>13 end. Be safe and be smart my son.</p> <p>14 You sent that text to Mr. Depp?</p> <p>15 A According to this, yes.</p> <p>16 Q And do you know what you meant by "be safe</p> <p>17 and be smart"?</p> <p>18 A I don't know.</p> <p>19 Q And then Mr. Depp wrote: I've -- I been</p> <p>20 off of for 3 days. The Doc jumped the gun...</p> <p>21 Also... Please thank him for the Motrin and the</p> <p>22 baclofen. They work a treat for amputated fingers</p>	<p style="text-align: right;">151</p> <p>1 A I do not.</p> <p>2 Q Okay. If you go down to the next page you</p> <p>3 write: I would be more than happy to come back</p> <p>4 and help you with pain management and Toradol</p> <p>5 injections. I know Kipper loves you and would</p> <p>6 always want to continue your care if you are no</p> <p>7 longer using.</p> <p>8 You wrote that to Mr. Depp?</p> <p>9 A According to this.</p> <p>10 Q This text was on your phone, correct?</p> <p>11 A Correct.</p> <p>12 Q What did you mean by "Kipper loves you and</p> <p>13 would always want to continue your care if you are</p> <p>14 no longer using"?</p> <p>15 A I don't know. Just what it says.</p> <p>16 Q No longer using --</p> <p>17 A I don't know what that was regarding.</p> <p>18 Q You don't know what "no longer using" is</p> <p>19 referring to?</p> <p>20 A I do not.</p> <p>21 Q And then Mr. Depp wrote: I don't know...</p> <p>22 I'm gonna stop it all, except, whatever I was on</p>
<p style="text-align: right;">150</p> <p>1 [sic]... goddamn... I love that weird fucker, no</p> <p>2 matter what.</p> <p>3 You received that text from Mr. Depp?</p> <p>4 A According to this.</p> <p>5 Q Do you understand what is meant by I have</p> <p>6 been off of for 3 days?</p> <p>7 A I have no idea.</p> <p>8 Q Okay. You respond: So glad to hear you</p> <p>9 have been off. No matter what, I just want you to</p> <p>10 feel better.</p> <p>11 A Yeah, I don't know what we were referring</p> <p>12 to.</p> <p>13 Q Could it have been off of drugs and</p> <p>14 alcohol?</p> <p>15 MS. MEYERS: Objection; leading, calls for</p> <p>16 speculation, assumes facts not in evidence.</p> <p>17 MS. HICKOX: Join.</p> <p>18 THE WITNESS: Yeah, I don't recall what we</p> <p>19 were referring to.</p> <p>20 Q And do you know what -- you don't have an</p> <p>21 understanding of what Mr. Depp meant by "the Doc</p> <p>22 jumped the gun"?</p>	<p style="text-align: right;">152</p> <p>1 before and just deal with it.</p> <p>2 You received that text from Mr. Depp?</p> <p>3 A Yes.</p> <p>4 Q Do you know what he was referring to where</p> <p>5 he said, I'm going to stop it all, except,</p> <p>6 whatever I was on before and just deal with it?</p> <p>7 A I do not know what that's regarding.</p> <p>8 Q Okay. And then you wrote: I respect</p> <p>9 whatever decisions you make. I will be sad to</p> <p>10 leave the crew as I love you all. I hope to</p> <p>11 always be in touch even if you choose not to</p> <p>12 continue a working relationship. Miss you</p> <p>13 already. I will get in touch with Kevin and get</p> <p>14 my stuff out or [sic] 72 soon. Hugs.</p> <p>15 You wrote that message to Mr. Depp?</p> <p>16 A According to this.</p> <p>17 Q Okay. But you have no recollection of</p> <p>18 these text messages that you exchanged with</p> <p>19 Mr. Depp. Is that your testimony?</p> <p>20 A I -- I don't remember details of any of</p> <p>21 these.</p> <p>22 Q Okay. And you don't remember -- these</p>

<p style="text-align: right;">153</p> <p>1 text messages and e-mails we went through don't</p> <p>2 refresh your recollection at all of Dr. Kipper</p> <p>3 terminating his care of Mr. Depp for at least a</p> <p>4 period of time?</p> <p>5 MS. MEYERS: Objection --</p> <p>6 THE WITNESS: No.</p> <p>7 MS. MEYERS: -- vague, assumes facts not</p> <p>8 in evidence, calls for speculation.</p> <p>9 MS. HICKOX: Join.</p> <p>10 Q And you said "No," right?</p> <p>11 A No, I do not.</p> <p>12 Q Okay. And then Mr. Depp wrote: Take</p> <p>13 care, Darlin'... I cannot ever thank you enough</p> <p>14 all you've done for me... On the junky side and</p> <p>15 the broken heart side. You've been a lifesaver...</p> <p>16 Literally. We'll be seeing each other again,</p> <p>17 sweetheart. Love you so much, Little Debbie...</p> <p>18 And so does my entire crew. X.</p> <p>19 You received that text message from</p> <p>20 Mr. Depp, right?</p> <p>21 A According to this, yes. I'm gonna cry.</p> <p>22 MR. NADELHAFT: All right, we can take</p>	<p style="text-align: right;">155</p> <p>1 BY MR. NADELHAFT:</p> <p>2 Q Ms. Lloyd, I'm showing you what's been</p> <p>3 marked as Exhibit Lloyd 17, which is LLOYD 158</p> <p>4 through 160, which is a text message between you</p> <p>5 and Johnny Depp from your phone. Do you see that?</p> <p>6 A Yes.</p> <p>7 Q Okay. And on March 27, 2015, you wrote:</p> <p>8 Good morning sleepy head. Erin came by to give</p> <p>9 you a shot but you were still sleeping. Take the</p> <p>10 pill form of Toradol to hold you over and I will</p> <p>11 check in with you when I am done my appointment in</p> <p>12 Beverly Hills.</p> <p>13 And then you wrote: Have you taken pill?</p> <p>14 If not, hold off and Erin is on her way to give</p> <p>15 you injection.</p> <p>16 Do you see that?</p> <p>17 A Yes.</p> <p>18 Q And you wrote that text message,</p> <p>19 correct -- those messages?</p> <p>20 A Yes.</p> <p>21 Q And then on the next page Mr. Depp wrote:</p> <p>22 The fucking pain is as bad as when it was cut off.</p>
<p style="text-align: right;">154</p> <p>1 that down.</p> <p>2 MS. HICKOX: Counsel, it is about</p> <p>3 lunchtime in California. Is now a good lunch</p> <p>4 break?</p> <p>5 MR. NADELHAFT: Yeah, we can take a break.</p> <p>6 That's fine.</p> <p>7 MS. HICKOX: Okay.</p> <p>8 THE VIDEOGRAPHER: The time is 3:13 p.m.</p> <p>9 We're going off the record.</p> <p>10 (Recess was held.)</p> <p>11 THE VIDEOGRAPHER: The time is 4:01 p.m.</p> <p>12 We're now back on the record.</p> <p>13 MR. NADELHAFT: Welcome back after lunch.</p> <p>14 Catherine, can you put up Attachment 27,</p> <p>15 please.</p> <p>16 AV TECHNICIAN: Please stand by.</p> <p>17 MR. NADELHAFT: Thanks.</p> <p>18 (Lloyd 17, Text message chain between Depp</p> <p>19 and Lloyd, Bates Nos. LLOYD 000158 through LLOYD</p> <p>20 000160, was marked for identification and is</p> <p>21 attached to the transcript.)</p> <p>22 AV TECHNICIAN: Exhibit 17.</p>	<p style="text-align: right;">156</p> <p>1 Horrific.</p> <p>2 You received that message from Mr. Depp?</p> <p>3 A Yes.</p> <p>4 Q And he's talking about his finger there,</p> <p>5 correct?</p> <p>6 MS. HICKOX: Objection; calls for</p> <p>7 speculation, assumes facts.</p> <p>8 Q You can answer.</p> <p>9 A Yes.</p> <p>10 Q Okay.</p> <p>11 MR. NADELHAFT: That's all I have for this</p> <p>12 document. We can take that down. If you can put</p> <p>13 up Attachment 28, please.</p> <p>14 (Lloyd 18, Text message chain between</p> <p>15 Heard and Lloyd, Bates Nos. LLOYD 000044 through</p> <p>16 LLOYD 000049, was marked for identification and is</p> <p>17 attached to the transcript.)</p> <p>18 AV TECHNICIAN: Exhibit 18.</p> <p>19 Q Ms. Lloyd, I'm showing you what's been</p> <p>20 marked as Lloyd Exhibit 18, which is a text</p> <p>21 message chain between you and Amber. Do you see</p> <p>22 that?</p>

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1 **A Yes. Yes.**
 2 Q And this text message chain came from your
 3 phone, correct?
 4 **A Yes.**
 5 Q Okay. And on March 30, 2015, Amber wrote:
 6 Debbie can you please go check on J? Just got off
 7 the phone with him and he sounded fucked up.
 8 Do you see that?
 9 Oh, Ms. Lloyd, you're on mute.
 10 **A I know. My gardeners are here and my dogs**
 11 **are going ballistic.**
 12 Q I thought so. Do we want to take a break
 13 for a minute or are we okay?
 14 **A I'm hoping they'll be gone within five**
 15 **minutes.**
 16 Q Do you want to just take a five-minute
 17 break?
 18 **A No, let's see if it -- let's try.**
 19 Q Okay. So you see the text message that
 20 says -- from Amber, Debbie can you please go check
 21 on J? Just got off the phone with him and he
 22 sounded fucked up?

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1 **A I see that, yes.**
 2 Q And you received that text message from
 3 Amber, correct?
 4 **A Correct.**
 5 Q Right. And then you wrote: He is at the
 6 studio with Marcus and is supposed to call me when
 7 he gets back to lofts. I will drive up there if
 8 you want me to. Always feel weird showing up
 9 unexpected. Do you want me to go?
 10 You wrote that text message to Amber?
 11 **A I don't recall. But according to this,**
 12 **yes.**
 13 Q And do you know who Marcus is?
 14 **A Yes.**
 15 Q Who is Marcus?
 16 **A Marcus Mumford.**
 17 Q And what was his relationship to Mr. Depp?
 18 **A Friend.**
 19 Q And then you wrote: I know Stephen is
 20 there. Let me just check in and see what I can
 21 find out. I'll get right back to you.
 22 Who is Stephen?

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1 **A His assistant.**
 2 Q And then you wrote: Stephen is there.
 3 Said he is really, really stoned but absolutely no
 4 alcohol and no sign of cocaine and/or trips to the
 5 bathroom. At first I acted liked I was just
 6 calling to check in and then told Stephen you were
 7 concerned. He says you --
 8 **MR. NADELHAFT: Go to the next page.**
 9 Q -- can text him if you have any questions.
 10 I told Stephen to call me immediately if there are
 11 any signs of anything else. Stephen said he is
 12 almost falling asleep at this point.
 13 You wrote that text message?
 14 **A According to this, yes.**
 15 Q Do you remember Amber being concerned that
 16 Mr. Depp had taken cocaine?
 17 **MS. HICKOX: Objection; calls for**
 18 **speculation, assumes facts, vague.**
 19 **MS. MEYERS: Also calls for hearsay. And**
 20 **join in the other objections.**
 21 **THE WITNESS: I -- I don't know what**
 22 **Amber's thoughts were.**

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1 Q Do you ever remember checking if Mr. Depp
 2 had been taking cocaine?
 3 **A I don't remember specifically asking any**
 4 **questions related to that.**
 5 Q Is there any reason to believe that you
 6 didn't do what you said in your text message?
 7 **A No.**
 8 Q Okay.
 9 **A I don't believe my text says I was asking**
 10 **that, though.**
 11 Q What do you believe your text was asking
 12 to Stephen?
 13 **A That I just called to check in, and that's**
 14 **what Stephen reported.**
 15 Q Okay. And would Stephen re- -- okay. And
 16 you don't recall what you said to Stephen,
 17 correct?
 18 **A I do not.**
 19 Q Okay. And it's Stephen reporting to you
 20 that there were no trips to the bathroom by
 21 Mr. Depp?
 22 **A That's what it states.**

Conducted on March 8, 2022

<p style="text-align: right;">161</p> <p>1 Q Okay. And then Amber wrote: Okay. 2 Thanks. When I spoke to him he was really 3 paranoid and thinking I was angry at him and mad 4 etc when I literally couldn't have been nicer and 5 kept saying I was absolutely not mad at him. He 6 kept acting like he couldn't hear/understand me 7 and seemed really confused and paranoid. As long 8 as there are no pills etc -- are you checking to 9 make sure that Xanax consumption is okay? 10 You received that text message from Amber? 11 A Correct. 12 Q All right. And then you wrote: He has 13 been really good with the Xanax. We have been 14 giving him the Valium but stopped those injections 15 2 days ago - switched to pill form and are 16 tapering him off. Will switch Toradol injections 17 to another NDSAID in pill form tomorrow. He had 18 been okay with the weed during the day but smoking 19 at night. I know this is scary for you. Please 20 reach out if I can help you through this. You 21 wrote that text message to Amber? 22 A Correct.</p>	<p style="text-align: right;">163</p> <p>1 A Yes. 2 Q Okay. 3 MR. NADELHAFT: All right, we can take 4 that down. Can you please put back up Exhibit 1. 5 Q Ms. Lloyd, I'm showing you again what's 6 been marked as Exhibit 1. And I'm going to point 7 you to Kipper 167, which is from April 13, 2015. 8 A Okay. 9 Q Do you see the entry for 1500? 10 A Yes. 11 Q All right. You wrote: Bandage changed 12 and hand exercises done at appointment with 13 surgeon's office. Per RN at surgeon's office and 14 occupational therapist, hand is healing well and 15 finger has good range of motion. Exercises to be 16 done 3-5 times per day. Patient is in good 17 spirits and said he has not smoked marijuana in 3 18 days. States he feels majority of his issues with 19 his wife have been from him using drugs and 20 alcohol. Patient states he will no longer 21 sneak/use and wants to enjoy clarity. 22 You wrote that?</p>
<p style="text-align: right;">162</p> <p>1 Q Okay. Do you recall what you were giving 2 Mr. Depp Valium for? 3 A I do not. 4 Q Do you recall what you were giving 5 Mr. Depp Toradol injections for? 6 A Yes. 7 Q What were you giving him Toradol 8 injections for? 9 A Pain. 10 Q Pain in where, his finger? 11 A Correct. 12 Q And then you wrote: He had been okay with 13 the weed during the day but smoking at night. 14 What were you referring to there? 15 A I don't recall. 16 Q And then you wrote: I know this is scary 17 for you. What did you mean by that? 18 A I don't recall. 19 Q Okay. And then you continued to write: 20 Stephen is going to stay a while and let me know 21 if he falls asleep there or heads back here. 22 You wrote that?</p>	<p style="text-align: right;">164</p> <p>1 A Yes. 2 Q And these are part of your nurse's notes? 3 A Yes. 4 Q And Mr. Depp told you that he felt the 5 majority of his issues with his wife had been from 6 him using drugs and alcohol? 7 MS. MEYERS: Objection; calls for hearsay. 8 THE WITNESS: According to the note, yes. 9 Q And Mr. Depp wrote he will no longer 10 sneak/use and wants to enjoy clarity. 11 MS. MEYERS: Objection; misstates the 12 document and calls for hearsay. 13 MS. HICKOX: Join. 14 THE WITNESS: According to the document, 15 yes. 16 Q What is being referred to as "no longer 17 sneak/use"? 18 A I only know what's stated in my notes. 19 Q Would it be anything other than drugs or 20 alcohol? 21 MS. MEYERS: Objection; calls for 22 speculation, asked and answered.</p>

<p style="text-align: right;">165</p> <p>1 MS. HICKOX: Join.</p> <p>2 THE WITNESS: I don't recall.</p> <p>3 BY MR. NADELHAFT:</p> <p>4 Q Was there anything that Mr. Depp was</p> <p>5 sneaking other than drugs and alcohol that you</p> <p>6 were concerned about?</p> <p>7 MS. MEYERS: Objection; calls for</p> <p>8 speculation, asked and answered, calls for</p> <p>9 hearsay.</p> <p>10 MS. HICKOX: Join. It also assumes facts</p> <p>11 not in evidence, lacks foundation.</p> <p>12 THE WITNESS: I don't recall.</p> <p>13 Q If we go to 175, Kipper 175 on this</p> <p>14 page -- on this document, it's notes for June 28,</p> <p>15 2015.</p> <p>16 A June... Okay.</p> <p>17 Q It talks -- it says, at 1700, RN received</p> <p>18 initial results from brain MRI - no obvious</p> <p>19 abnormalities noted. Final report will be done</p> <p>20 tomorrow. Patient informed of results.</p> <p>21 Do you recall why Mr. Depp received a</p> <p>22 brain MRI?</p>	<p style="text-align: right;">167</p> <p>1 Q Yes, okay.</p> <p>2 So Mr. Depp told you he'd taken about four</p> <p>3 Xanax 1 milligram over the past 24 hours, correct?</p> <p>4 MS. MEYERS: Objection; calls for hearsay.</p> <p>5 THE WITNESS: According to my notes, yes.</p> <p>6 Q Okay. And then at 1920 on June 13th it</p> <p>7 says, Patient had another argument with his wife.</p> <p>8 Patient was anxious and was asking for medication</p> <p>9 to help calm him down. Seroquel 50 milligrams</p> <p>10 administered.</p> <p>11 Do you see that?</p> <p>12 A Yes.</p> <p>13 Q And that's a note you wrote?</p> <p>14 A Yes.</p> <p>15 Q Now, the nursing notes that I have for you</p> <p>16 appear to end on June 30th. Do you know why that</p> <p>17 is?</p> <p>18 MS. HICKOX: Objection; calls for</p> <p>19 speculation.</p> <p>20 MS. MEYERS: Yeah, objection; misstates</p> <p>21 the document.</p> <p>22 THE WITNESS: Mine -- mine end on 7/1.</p>
<p style="text-align: right;">166</p> <p>1 A He was having chronic headaches.</p> <p>2 Q Were his chronic headaches ever -- strike</p> <p>3 that. Okay.</p> <p>4 And then do you see at 6/30 at 1300?</p> <p>5 A Yes.</p> <p>6 Q And that's highlighted?</p> <p>7 A Yeah.</p> <p>8 Q You wrote: RN arrived on set to visit</p> <p>9 patient. He was upset due to having an argument</p> <p>10 with his wife. Patient stated he had taken "about</p> <p>11 4" Xanax 1 milligram over the past 24 hours to</p> <p>12 deal with the stress he was feeling. Patient was</p> <p>13 able to express his emotions appropriately.</p> <p>14 Patient stated that he had not slept the night</p> <p>15 before due to argument with his wife.</p> <p>16 That's a note you wrote?</p> <p>17 A Correct.</p> <p>18 Q And that's based off of information</p> <p>19 provided to you by Mr. Depp?</p> <p>20 A I -- I don't recall.</p> <p>21 Q Well --</p> <p>22 A According to my note, yes.</p>	<p style="text-align: right;">168</p> <p>1 Q Okay. Do you know why your nursing notes</p> <p>2 ended on June 1st -- July 1, 2015?</p> <p>3 MS. HICKOX: Objection; calls for</p> <p>4 speculation. Ms. Lloyd didn't produce these</p> <p>5 documents.</p> <p>6 THE WITNESS: I do not.</p> <p>7 Q How -- did you continue to care for</p> <p>8 Mr. Depp as his nurse after July 1, 2015?</p> <p>9 A I do not recall my last date.</p> <p>10 Q Okay. Did you prepare nursing notes</p> <p>11 through the time that you were Mr. Depp's nurse?</p> <p>12 A I did.</p> <p>13 Q Okay. And did you provide those notes to</p> <p>14 Dr. Kipper?</p> <p>15 A I did.</p> <p>16 MR. NADELHAFT: All right. Can you put up</p> <p>17 Attachment 40, please.</p> <p>18 (Lloyd 19, 6/27/15 e-mail chain, Bates</p> <p>19 Nos. DEPP00005751 through DEPP00005753, was marked</p> <p>20 for identification and is attached to the</p> <p>21 transcript.)</p> <p>22 AV TECHNICIAN: Exhibit 19.</p>

Conducted on March 8, 2022

<p style="text-align: right;">169</p> <p>1 Q Okay. Ms. Lloyd, I'm showing you what's 2 been marked as Exhibit Lloyd 19. This is an 3 e-mail from Dr. David Kulber on June 27, 2015 that 4 you were copied on. Do you see that? 5 A Yes. 6 Q And do you know who Dr. Kulber is? 7 A I don't recall exactly who he was. 8 Q Did you understand that Mr. Depp went to a 9 specialist for his finger? 10 A Yes. 11 Q And Dr. Kulber wrote at the top: Ct of 12 finger looks quite good considering aside from 13 bone spikes which are related to this bad crush 14 injury. I agree with the plan. Thank you for 15 update and such great care. 16 You received that e-mail from Dr. Kulber? 17 A I don't recall. 18 Q You were copied on this e-mail? 19 A I see my name copied on the e-mail, yes. 20 Q And you recall that Doc- -- Mr. Depp was 21 treated for a bad crush injury for his finger? 22 MS. HICKOX: Objection; calls for</p>	<p style="text-align: right;">171</p> <p>1 Q Ms. Lloyd, I'm showing you what's been 2 marked as Exhibit 20, which is a text message 3 chain between you and Mr. Depp from your phone. 4 Do you see that? 5 A I see that. 6 Q On July 5, 2015 Mr. Depp wrote to you: 7 Canceling the squeezing and needles tonight. Need 8 to get the recluse out of his cage and his brain. 9 You received that text message from 10 Mr. Depp? 11 A Yes. 12 Q And then you said: How come you're 13 canceling? You okay? Not sure what you mean by 14 the rest -- 15 MR. NADELHAFT: If we can go to the next 16 page. 17 Q -- of your text. Please let me know if 18 you need anything. I am here if you want to chat 19 or want me to go hang at the house with you. 20 You wrote that text to Mr. Depp? 21 A Yes. 22 Q And then Mr. Depp wrote to you: I'm in a</p>
<p style="text-align: right;">170</p> <p>1 speculation, assumes facts not in evidence, lacks 2 foundation, vague. 3 MS. MEYERS: Join. 4 THE WITNESS: I recall him being treated 5 for a finger injury. I didn't re- -- this is the 6 first I remember hearing it was a crush injury. 7 BY MR. NADELHAFT: 8 Q And that's the e-mail you received from 9 Dr. Kulber, correct? 10 A I'm seeing this today. I don't recall 11 receiving this e-mail. 12 Q Is there any reason to believe that you 13 didn't receive this e-mail? 14 A No. I just don't recall. 15 Q Sure. 16 MR. NADELHAFT: Okay, we can take that 17 down. And can you put up Attachment 30, please. 18 (Lloyd 20, Text message chain between Depp 19 and Lloyd, Bates Nos. LLOYD 000223 through LLOYD 20 000225, was marked for identification and is 21 attached to the transcript.) 22 AV TECHNICIAN: Exhibit 20.</p>	<p style="text-align: right;">172</p> <p>1 very anxious and painfully confused state... 2 Rather not get into details... But, in a 3 nutshell... Problems with family, my company, the 4 Ex, business manager and my fuckin' jumbled 5 brain... Will need refills of meds tomorrow... 6 Thanks, honey. X. 7 You received that text message from 8 Mr. Depp? 9 A According to this, yes. 10 Q And Mr. Depp talked about how he was 11 having problems with his family? 12 A That's what this states. 13 Q And Mr. Depp was having problems with his 14 company? 15 A That's what this states. 16 Q And Mr. Depp was having problems with the 17 ex? 18 A That's what this states. 19 Q Do you know who the "Ex" he was referring 20 to as of June -- as of July 2015? 21 MS. HICKOX: Objection; calls for 22 speculation.</p>

<p>1 MS. MEYERS: Join. 2 BY MR. NADELHAFT: 3 Q Do you know? 4 A I – I don't recall. 5 Q Okay. And Mr. Depp was having problems 6 with his business manager? 7 A According to this text. 8 Q And Mr. Depp was having trouble with his 9 "fucking jumbled brain," correct? 10 A According to this text. 11 MR. NADELHAFT: All right, we can take 12 that down. And just going back to Exhibit 1 for a 13 moment, and if we can go back to Kipper 167. 14 Q And, Ms. Lloyd, I'd ask you to look at the 15 entries for April 14th. It's at the bottom. 16 A Okay. 17 Q You wrote at 1400: RN and MD arrived at 18 patient's home to have meeting to set treatment 19 plan and boundaries while traveling in Australia. 20 You wrote that? 21 A Correct. 22 Q And the "RN" is you, correct?</p>	<p>173 175 1 property and informed MD of the events. Per MD 2 drop tomorrow's meds off with security and do not 3 reach out to patient again - wait for patient to 4 reach out to medical team. 5 You wrote that note? 6 A Correct. 7 Q Do you recall this event? 8 A I do not. 9 Q You don't recall Mr. Depp screaming at 10 you? 11 MS. MEYERS: Objection; misstates the 12 document, assumes facts not in evidence, calls for 13 hearsay. 14 MS. HICKOX: Join. 15 Q Is that a no? 16 A No. I – I don't read the note like that. 17 Q What did you mean by "patient screamed 18 'what'"? 19 A I read that as he didn't know it was me. 20 He just heard somebody knocking on his door and 21 screamed "what." 22 Q And then you were -- do you recall being</p>
<p>1 A Yes. 2 Q And the "MD" is Dr. Kipper, correct? 3 A Correct. 4 Q And do you recall what the treatment plans 5 and boundaries were while traveling in Australia 6 as of April 2015? 7 A I do not recall. 8 Q And then if we go to the next page, do you 9 see the April 15th entries? 10 A Yes. 11 Q Okay. And at 1215 you write: arrived at 12 patient's home. Assistant was in hallway and 13 informed RN that patient was in a bad mood and 14 told assistant he did not need anything from him 15 today. RN was let in home by security and knocked 16 on patient's door to let him know she was there. 17 Patient screamed "what." RN informed patient she 18 was letting him know she was there and would be 19 downstairs. About 5 minutes later security came 20 into house and informed RN that patient has told 21 security to get everyone out of his home and he 22 did not want any more unexpected guests. RN left</p>	<p>174 176 1 escorted out by security? 2 A I don't recall. But according to this, 3 that was the event. 4 Q Okay. And this document also -- this note 5 also talks about you informing Dr. Kipper about 6 what happened that -- in this note, correct? 7 A Yes. 8 Q So was there -- do you recall why you 9 talked -- told Dr. Kipper about this? 10 A I do not recall. 11 MR. NADELHAFT: And can we put up 12 Attachment 29, please. 13 Q Do you ever recall being escorted out at 14 any other time from Mr. Depp's house? 15 A I don't recall. 16 (Lloyd 21, Text message chain between Depp 17 and Lloyd, Bates Nos. LLOYD 000170 through LLOYD 18 000177, was marked for identification and is 19 attached to the transcript.) 20 AV TECHNICIAN: Exhibit 21. 21 Q Okay. Ms. Lloyd, I'm showing you what's 22 been marked as Lloyd 21. Do you see on April 15th</p>

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1 at the bottom there is a text from Mr. Depp?
2 A Yes.
 3 Q And he wrote: Hey, sweetheart... I am so
 4 sorry about today... I thought you were Stephen,
 5 whom I am not particularly enthused about for his
 6 loss of loyalty and his loss of memory... He has
 7 tried everything to fuck me over, as far as
 8 traveling with my wife. He also bursts into my
 9 fucking house like it's goddamn Grand Central
 10 Station. I'm truly sorry if I upset you. If you
 11 like, you can give me some morphine to see if my
 12 tongue and penis touch. All my love. J.
 13 Did you receive this text from Mr. Depp?
14 A It appears so. I don't -- yes.
 15 Q Okay. Did you -- do you have any
 16 understanding as to what Mr. Depp was referring to
 17 where he says, Stephen "tried everything to fuck
 18 me over, as far as traveling with my wife"?
19 A I do not --
 20 MS. HICKOX: Objection; calls for
 21 speculation, lacks foundation, assumes facts not
 22 in evidence, vague.

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1 MS. MEYERS: Join.
 2 THE WITNESS: No, I don't know what he was
 3 referring to.
 4 BY MR. NADELHAFT:
 5 Q Do you have any understanding as to what
 6 Mr. Depp was referring to regarding Stephen's loss
 7 of loyalty and his loss of memory?
8 A I do not.
 9 MS. HICKOX: Same objections.
 10 MS. MEYERS: Same objections. Join.
 11 Q And then Mr. Depp wrote, Hey,
 12 sweetheart... I am so sorry about today... I
 13 thought you were Stephen, whom -- oh, okay. I
 14 guess that's the same thing.
 15 And then next page. And you wrote: Thank
 16 you for reaching out. I was not upset by your
 17 initial response when I knocked on your door, as I
 18 knew you were upset with Stephen and I -- thought
 19 I was him. However, I was upset that once you
 20 knew it was me you had security come escort me out
 21 of your house. I was only there to help you, to
 22 change your bandages, do your exercises and make

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1 sure you were okay. I knew you were not answering
 2 texts and thought we had set it up I would arrange
 3 with security when I would come over today. I
 4 understand it was a tough moment but it was a bit
 5 humiliating to be escorted out when I was just
 6 there to help you. Anyway, like I've said in the
 7 past, our relationship is mature enough where we
 8 can be open and honest and move on. So with that
 9 being said, what time shall I come over tomorrow?
 10 Does this help refresh your recollection
 11 at all about the event?
12 A No.
 13 Q You don't recall at all being humiliated
 14 by being escorted out of Mr. Depp's house?
 15 MS. MEYERS: Objection; asked and
 16 answered.
 17 THE WITNESS: I don't.
 18 MR. NADELHAFT: Okay. All right, we can
 19 take that down.
 20 I'm going to end my questioning right now
 21 and reserve any additional time after Ms. Meyers
 22 asks you her line of questioning.

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1 MS. MEYERS: How much time --
 2 MR. NADELHAFT: Thank you.
 3 MS. MEYERS: How much time do we have on
 4 the record?
 5 THE VIDEOGRAPHER: Please stand by. It's
 6 going to be 3 hours and 13 minutes.
 7 MS. MEYERS: Okay. Great.
8 EXAMINATION
 9 BY MS. MEYERS:
 10 Q Ms. Lloyd, do you want a break before we
 11 begin or do you want to --
12 A I'm okay. Thank you.
 13 Q Okay. Great.
 14 Again, thank you for your time today.
 15 First of all, going back to your work for
 16 Dr. Kipper, you said -- I think you testified
 17 earlier you cared for multiple patients that were
 18 of Dr. Kipper's, correct?
19 A Correct.
 20 Q And when you would care for Dr. Kipper's
 21 patients, how would you report their status to
 22 Dr. Kipper?

<p style="text-align: right;">181</p> <p>1 MR. NADELHAFT: Objection; vague. 2 THE WITNESS: Multiple different 3 resources: Phones, texts, verbal -- verbal and 4 written. 5 BY MS. MEYERS: 6 Q And how often would you report to 7 Dr. Kipper about his patients? 8 A Responded -- I mean, it depended on 9 different patients. It varied. 10 Q And I believe you testified earlier that 11 you maintained nursing notes for those patients, 12 correct? 13 A Correct. 14 Q What type of information did you maintain 15 in these notes? 16 A Mainly we provide care given and patient's 17 responses to care given or any external factors 18 that could affect the patient. 19 Q Is there any information that you would 20 not include in your notes? 21 A Not -- 22 MR. NADELHAFT: Objection; hypothetical,</p>	<p style="text-align: right;">183</p> <p>1 A Yes. 2 Q In your time as a registered nurse have 3 you ever had a patient that you suspected was the 4 victim of domestic abuse? 5 A No. 6 MR. NADELHAFT: Objection; form, 7 foundation. 8 Q Do you have any professional 9 responsibility to report domestic abuse? 10 A Yes. 11 Q And what is that responsibility? 12 A I'm a mandated reporter for child/elder 13 abuse and any suspected injuries. 14 Q How would you define "suspected injuries"? 15 A If I was to work in a facility and 16 somebody came in and reported, or I thought that 17 it was a result from an injury caused by somebody 18 else. 19 Q Who do you report the abuse to in that 20 instance? 21 A I've never had to report abuse. 22 Q Okay. But given your professional</p>
<p style="text-align: right;">182</p> <p>1 speculation. 2 BY MS. MEYERS: 3 Q I'm sorry, I didn't catch your answer. 4 A Not specifically. 5 Q Other than Dr. Kipper, does anyone else 6 review your notes? 7 A If another nurse was to work on the case 8 they could re- -- have access to the notes. 9 Q And does Dr. Kipper advise you on any 10 information that should be maintained in your 11 notes? 12 A Not directly. 13 Q Has he ever told you that certain 14 information should not be included in your notes? 15 A No. 16 MR. NADELHAFT: Objection; hearsay. 17 Q How long have -- when did you become a 18 registered nurse? 19 A 2004. 20 Q And have you been employed as a registered 21 nurse from that time up until you became a nurse 22 practitioner?</p>	<p style="text-align: right;">184</p> <p>1 responsibility, do you know who you would report 2 that to in that event? 3 MR. NADELHAFT: Objection; hypothetical. 4 THE WITNESS: I do not. 5 Q In your time as a registered nurse, have 6 you ever witnessed physical violence by one of 7 your patients? 8 A I do not recall ever witnessing any 9 violence. 10 Q And when you say "any violence," does that 11 mean perpetrated by your patient or against your 12 patient or just -- 13 A Just in general violence. 14 MS. MEYERS: Can we please pull up 15 Document A. 16 AV TECHNICIAN: Yes, Counsel. And would 17 you like to mark this the next in order? 18 MS. MEYERS: Yes, please. And what is the 19 next exhibit? 20 AV TECHNICIAN: It would be 22. 21 MS. MEYERS: Okay. 22 (Lloyd 22, Johnny Depp Progress Note</p>

<p style="text-align: right;">185</p> <p>1 6/11/14, Bates Nos. DEPP00001799 and DEPP001800, 2 was marked for identification and is attached to 3 the transcript.) 4 AV TECHNICIAN: 22. 5 BY MS. MEYERS: 6 Q Ms. Lloyd, do you recognize this document? 7 A No. 8 Q This document is dated June 11th, correct 9 -- 2014, correct? 10 A Yes. 11 Q And I assume, because you don't recognize 12 it, that you did not prepare this document? 13 A I don't know. No, I did not. 14 Q Okay. Directing your attention to the 15 first sentence. It says, I met with Mr. Depp to 16 review our treatment plan and introduce him to his 17 nursing supervisor, Debbie Lloyd, R.N. 18 Do you see that? 19 A Yes. 20 Q Does this reflect the first time that you 21 met Mr. Depp? 22 MR. NADELHAFT: Objection; speculation.</p>	<p style="text-align: right;">187</p> <p>1 A I don't -- I don't recall the dates they 2 got engaged. 3 Q Were they married when you first met them? 4 A No. 5 Q Did you attend their wedding? 6 A Yes. 7 Q And where was that? 8 A On the island in the Bahamas. 9 MS. MEYERS: Can we take this down and 10 please pull up what I've marked as Document B. 11 (Lloyd 23, Ms. Lloyd's nursing notes, 12 Bates Nos. DEPP00001653 through DEPP00001754, was 13 marked for identification and is attached to the 14 transcript.) 15 AV TECHNICIAN: Exhibit 23. 16 Q Now, just for the record, I believe these 17 are the nursing notes you were looking at earlier; 18 this just has a different production number. I 19 just thought it might go more smoothly if I am 20 calling out the correct page numbers. 21 So just to establish this: Do you 22 recognize this document here?</p>
<p style="text-align: right;">186</p> <p>1 THE WITNESS: It does. I'm looking. My 2 notes say the 12th but... 3 BY MS. MEYERS: 4 Q So you met Mr. Depp either on June 11th or 5 June 12th of 2014? 6 A According to my notes, yes. 7 Q Okay. And had you ever spoken with him 8 before that date? 9 A No. 10 Q When did you first meet Ms. Heard? 11 A I don't recall. 12 Q Do you recall when you first met -- not 13 specifically when, but do you recall the instance 14 when you first met her? 15 A I do not. 16 Q When you first met Ms. Heard, did you have 17 an understanding as to what her relationship to 18 Mr. Depp was at the time? 19 A Yes. 20 Q And what was that understanding? 21 A That they were in a relationship. 22 Q Were they engaged when you first met them?</p>	<p style="text-align: right;">188</p> <p>1 A Yes. 2 Q And these are your nursing notes that I 3 believe you looked at with Mr. Nadelhaft earlier, 4 correct? 5 A Correct. 6 Q Okay. I'd like to direct your attention 7 to the entry for June 17th of 2014 which is on the 8 page with -- 9 Perfect. There it is. 10 Q This is a note you prepared, correct? 11 A Correct. 12 Q And at the time that you prepared this 13 note, were you in Boston with Mr. Depp? 14 A According to the note, yes. 15 Q Now, in the subsection that says 2- -- 16 2330, do you see where it says, Accompanied 17 patient, fiancé, assistants and security to 18 concert? 19 A Yes. 20 Q Okay. And in this note "patient" refers 21 to Mr. Depp; is that right? 22 A Yes.</p>

<p style="text-align: right;">189</p> <p>1 Q And "fiancé" is Ms. Heard?</p> <p>2 A Yes.</p> <p>3 Q Does this refresh your recollection that</p> <p>4 Mr. Depp and Ms. Heard were engaged in June of</p> <p>5 2014?</p> <p>6 A According to this, yes.</p> <p>7 Q Okay. Is this the first time you met</p> <p>8 Ms. Heard?</p> <p>9 A I don't recall when I met her.</p> <p>10 Q Further down in the note do you see where</p> <p>11 it says, Assistant was also asked to pass on RN</p> <p>12 and MD's numbers to fiancé as we would both like</p> <p>13 to speak with her and to obtain her input towards</p> <p>14 patient treatment needs?</p> <p>15 Do you see where I'm referring to?</p> <p>16 A Yup.</p> <p>17 Q Okay. "RN" is referring to you in this</p> <p>18 instance?</p> <p>19 A Correct.</p> <p>20 Q And "MD" refers to Dr. Kipper?</p> <p>21 A Correct.</p> <p>22 Q Do you recall why you wanted to speak with</p>	<p style="text-align: right;">191</p> <p>1 MS. MEYERS: Can we please pull up</p> <p>2 Document C.</p> <p>3 AV TECHNICIAN: To clarify, C, Counsel?</p> <p>4 MS. MEYERS: Yeah, C.</p> <p>5 (Lloyd 24, Johnny Depp Treatment Record</p> <p>6 6/22-24/14, Bates Nos. DEPP00001796 through</p> <p>7 DEPP00001798, was marked for identification and is</p> <p>8 attached to the transcript.)</p> <p>9 AV TECHNICIAN: Exhibit 24.</p> <p>10 BY MS. MEYERS:</p> <p>11 Q Ms. Lloyd, do you recognize this document?</p> <p>12 A No.</p> <p>13 Q So I take it you did not prepare this</p> <p>14 document; is that correct?</p> <p>15 A Correct.</p> <p>16 Q Directing your attention to the bottom of</p> <p>17 the page, do you see where it says, This</p> <p>18 protracted therapy will include 12 step private</p> <p>19 counseling and personal psychotherapy -- personal</p> <p>20 psychotherapy and couples therapy with his fiancé</p> <p>21 Amber. Both are in agreement to this plan? Do</p> <p>22 you see where I'm referring?</p>
<p style="text-align: right;">190</p> <p>1 Ms. Heard at this time?</p> <p>2 A I do not.</p> <p>3 Q Do you recall Ms. Heard expressing</p> <p>4 interest in participating in Mr. Depp's treatment?</p> <p>5 MR. NADELHAFT: Objection; hearsay.</p> <p>6 THE WITNESS: I --</p> <p>7 MR. NADELHAFT: You can answer.</p> <p>8 THE WITNESS: I don't remember the events</p> <p>9 other than what's stated in my notes.</p> <p>10 Q Okay. Your phone number was given to</p> <p>11 Ms. Heard, though, correct?</p> <p>12 A Correct.</p> <p>13 Q Okay. And then at the bottom of the page,</p> <p>14 I think this goes on to the next page, do you see</p> <p>15 where it says, Status report given to MD via</p> <p>16 phone. MD will be visiting patient June 22-24?</p> <p>17 A I see that.</p> <p>18 Q Okay. So is that consistent with your</p> <p>19 recollection that Dr. Kipper came out to see</p> <p>20 Mr. Depp?</p> <p>21 A I don't remember. He would come and go</p> <p>22 when we were on locations.</p>	<p style="text-align: right;">192</p> <p>1 A Yes.</p> <p>2 Q Do you recall that couples therapy was a</p> <p>3 component of Mr. Depp's treatment?</p> <p>4 A I don't recall what was said between him</p> <p>5 and the doctor.</p> <p>6 Q Do you recall Mr. Depp and Ms. Heard</p> <p>7 attending couples therapy together?</p> <p>8 A Yes.</p> <p>9 Q And do you recall how many times?</p> <p>10 A I do not recall.</p> <p>11 Q Do you have any understanding as to why</p> <p>12 they were attending couples therapy?</p> <p>13 MR. NADELHAFT: Objection; speculation.</p> <p>14 THE WITNESS: Not specifically, no.</p> <p>15 Q If we can turn to the next page here. And</p> <p>16 then at the top it says, I met with Amber for</p> <p>17 90 minutes and discussed the above and her</p> <p>18 concerns that he be strictly monitored and</p> <p>19 supervised.</p> <p>20 Do you recall Dr. Kipper meeting with</p> <p>21 Amber early on in Mr. Depp's treatment?</p> <p>22 A I do not.</p>

<p style="text-align: right;">193</p> <p>1 Q Do you recall if you were present at any</p> <p>2 meetings with Dr. Kipper and Amber?</p> <p>3 A I do not recall.</p> <p>4 Q Okay.</p> <p>5 MS. MEYERS: If we can bring back up</p> <p>6 Document B, which is now marked as Exhibit 22; is</p> <p>7 that correct?</p> <p>8 MR. NADELHAFT: 23.</p> <p>9 MS. MEYERS: 23? Okay.</p> <p>10 Can we please go to the entry of June 24,</p> <p>11 2014, which is on DEPP 1661. Okay.</p> <p>12 Q Okay. Now, with respect to the entry for</p> <p>13 June 24, 2014, this is a note -- this is an entry</p> <p>14 you prepared, correct?</p> <p>15 A Correct.</p> <p>16 Q And the first line says, RN and MD met</p> <p>17 with patient's fiancé to inform her of treatment</p> <p>18 plan for patient.</p> <p>19 Do you see that?</p> <p>20 A I do.</p> <p>21 Q Does this refresh your recollection that</p> <p>22 you attended a meeting with Dr. Kipper and</p>	<p style="text-align: right;">195</p> <p>1 Mr. Nadelhaft was asking you questions where</p> <p>2 Ms. Heard was reaching out to you, correct?</p> <p>3 A Correct.</p> <p>4 Q When Mr. Depp became your patient, did</p> <p>5 Ms. Heard ever show you any pictures of Mr. Depp?</p> <p>6 MR. NADELHAFT: Objection; vague.</p> <p>7 THE WITNESS: I don't recall.</p> <p>8 Q Do you recall Ms. Heard showing you any</p> <p>9 pictures of cocaine?</p> <p>10 A I don't recall.</p> <p>11 Q Do you recall Ms. Heard ever showing you</p> <p>12 any audio recordings of Mr. Depp?</p> <p>13 MR. NADELHAFT: Objection; form,</p> <p>14 foundation.</p> <p>15 THE WITNESS: I don't recall.</p> <p>16 Q Okay. I'd like to move on to Mr. Depp's</p> <p>17 detox. And that was on his private island,</p> <p>18 correct?</p> <p>19 A Correct.</p> <p>20 Q And you traveled -- you traveled down to</p> <p>21 the island with Mr. Depp; is that right?</p> <p>22 A I don't recall. I'd have to -- it should</p>
<p style="text-align: right;">194</p> <p>1 Ms. Heard concerning Mr. Depp's treatment?</p> <p>2 A I don't recall the meeting.</p> <p>3 Q Do you have any reason to doubt that this</p> <p>4 meeting occurred?</p> <p>5 A No.</p> <p>6 Q Okay. Do you have any -- other than</p> <p>7 what's reflected in this note, do you have any</p> <p>8 other independent recollection of any such meeting</p> <p>9 with Dr. Kipper and Ms. Heard?</p> <p>10 A I do not.</p> <p>11 Q If I could direct your attention just to</p> <p>12 the last line of the note. It says here, She was</p> <p>13 encouraged to call RN or MD with any questions or</p> <p>14 concerns that might arise. Do you see that?</p> <p>15 A I do.</p> <p>16 Q Throughout your treatment of Mr. Depp did</p> <p>17 Ms. Heard reach out to you with questions and</p> <p>18 concerns?</p> <p>19 A Yes.</p> <p>20 Q She had your phone number, correct?</p> <p>21 A Yes.</p> <p>22 Q And I think we saw some text messages when</p>	<p style="text-align: right;">196</p> <p>1 be in my notes.</p> <p>2 Q We can look at those in a moment.</p> <p>3 But you were on the island with Mr. Depp</p> <p>4 for the --</p> <p>5 A Correct.</p> <p>6 Q -- majority of his detox, correct?</p> <p>7 A Yes.</p> <p>8 Q Okay. And when you were on the island,</p> <p>9 did you see where Mr. Depp was staying?</p> <p>10 A Yes.</p> <p>11 Q And was Ms. Heard staying with him in that</p> <p>12 location as well?</p> <p>13 A Yes.</p> <p>14 Q And what did their accommodations look</p> <p>15 like?</p> <p>16 A Can you be more specific?</p> <p>17 Q What type of structure were they staying</p> <p>18 in?</p> <p>19 A It was a house.</p> <p>20 MS. MEYERS: Could we pull up Document E,</p> <p>21 which is a short video.</p> <p>22 AV TECHNICIAN: Please stand by.</p>

<p style="text-align: right;">197</p> <p>1 MS. MEYERS: And for the record, this was 2 produced as DEPP 9811. 3 (Lloyd 25, Video, Bates No. DEPP00009811, 4 was marked for identification and is attached to 5 the transcript.) 6 AV TECHNICIAN: Showing Exhibit 25. Let 7 me know when you need me to play, Counsel. 8 MS. MEYERS: Please play. Thank you. 9 (Video played.) 10 BY MS. MEYERS: 11 Q Ms. Lloyd, do you recognize the location 12 reflected in that video? 13 A Yes. 14 Q And what is it? 15 A It's the -- Johnny's home on his island. 16 Q And is that where he was staying during 17 the detox process? 18 A Yes. 19 Q Is this generally what the house looked 20 like in August 2014? 21 MR. NADELHAFT: Objection; form, 22 foundation, speculation.</p>	<p style="text-align: right;">199</p> <p>1 A Yes. 2 Q And what is that location? 3 A It's Johnny's house on the island. 4 Q Okay. Do you see in the background 5 there's the image of a palm tree with a hammock? 6 A Yes. 7 Q What is that? 8 A I don't recall. 9 Q And the doorway next to that image, is 10 that the bathroom? 11 A I don't recall. 12 Q Okay. When you were on the island with 13 Mr. Depp for his detox, how long had you known 14 him? 15 A I'd have to refer to my notes. 16 Q Well, we can go back to it. But do you 17 recall that the earliest note is from June 12, 18 2014? 19 A Correct. 20 Q So you -- at this time you had known him 21 for approximately two or three months. Is that 22 fair?</p>
<p style="text-align: right;">198</p> <p>1 THE WITNESS: What do you mean generally 2 looked like? 3 BY MS. MEYERS: 4 Q Is that video consistent with how the 5 house looked in August of 2014? 6 MR. NADELHAFT: Same objections. 7 THE WITNESS: Yes. 8 Q Is there any part of the house that's not 9 reflected in that video? 10 MR. NADELHAFT: Objection; form, 11 foundation, speculation. 12 THE WITNESS: The bathroom wasn't in the 13 video. 14 Q Okay. 15 MS. MEYERS: Can we please pull up 16 Document F. 17 AV TECHNICIAN: Please stand by. 18 (Lloyd 26, Photograph, was marked for 19 identification and is attached to the transcript.) 20 AV TECHNICIAN: Exhibit 26. 21 Q Ms. Lloyd, do you also recognize the 22 location reflected in this photograph?</p>	<p style="text-align: right;">200</p> <p>1 A What's the date on this? 2 Q In -- excuse me. That's a fair point. We 3 can come back to that. Let's move on. 4 When you were on the island you were 5 personally overseeing Mr. Depp's detox process, 6 correct? 7 A Correct. 8 Q And how often would you see him in person 9 during that time? 10 MR. NADELHAFT: Objection; asked and 11 answered. 12 THE WITNESS: It varied. 13 Q Did you see him in person at least once a 14 day? 15 MR. NADELHAFT: Same objections. Asked 16 and answered. 17 THE WITNESS: I cannot recall. 18 Q When Dr. Kipper arrived do you recall how 19 often he would see Mr. Depp? 20 A I do not. 21 Q What substances was Mr. Dock -- excuse me. 22 What substances was Mr. Depp detoxing</p>

<p style="text-align: right;">201</p> <p>1 from?</p> <p>2 A Opiates.</p> <p>3 Q Was he detoxing from any other substances?</p> <p>4 A Not on the -- no, I don't recall.</p> <p>5 Q Have you overseen other patients detoxing</p> <p>6 from opiates before you were caring for Mr. Depp?</p> <p>7 A Yes.</p> <p>8 Q How many would you estimate?</p> <p>9 A Hundred -- hundreds.</p> <p>10 Q And in your experience, what happens when</p> <p>11 someone is detoxing from opiates?</p> <p>12 MR. NADELHAFT: Objection; form,</p> <p>13 hypothetical, foundation.</p> <p>14 MS. HICKOX: Join.</p> <p>15 THE WITNESS: Can you be more specific?</p> <p>16 Q What's -- what is that process -- what</p> <p>17 does that process do to the person physically?</p> <p>18 MR. NADELHAFT: Objection; calls for</p> <p>19 expert testimony.</p> <p>20 THE WITNESS: They go through withdrawal</p> <p>21 symptoms and we medicate them.</p> <p>22 Q And what type of withdrawal symptoms have</p>	<p style="text-align: right;">203</p> <p>1 Q How would you describe Mr. Depp's</p> <p>2 psychological state throughout the detox process?</p> <p>3 MR. NADELHAFT: Objection; form,</p> <p>4 foundation.</p> <p>5 THE WITNESS: I don't recall. I'd have to</p> <p>6 review my notes.</p> <p>7 Q All right. Let's go back to your notes,</p> <p>8 then, which I believe is Exhibit 23.</p> <p>9 MS. MEYERS: Okay, great. Could we first</p> <p>10 go to the entry dated August 8, 2014.</p> <p>11 Q Ms. Lloyd, does this refresh your</p> <p>12 recollection as to when you arrived on the island</p> <p>13 to assist Mr. Depp in his detox process?</p> <p>14 A According to my notes it was August 8th.</p> <p>15 Q Okay. And so -- I think we established</p> <p>16 earlier you met Mr. Depp in June. Fair to say</p> <p>17 that you had known him for about two months at</p> <p>18 this time?</p> <p>19 A Correct.</p> <p>20 Q Okay.</p> <p>21 MS. MEYERS: Can we please go to the entry</p> <p>22 for August 11, 2014.</p>
<p style="text-align: right;">202</p> <p>1 you observed?</p> <p>2 MR. NADELHAFT: Objection; form,</p> <p>3 foundation, hypothetical, calls for expert</p> <p>4 testimony.</p> <p>5 THE WITNESS: Nausea, vomiting, body</p> <p>6 aches, piloerection, rhinorrhea, restlessness,</p> <p>7 anxiety.</p> <p>8 Q Is there a time during the detox process</p> <p>9 when those symptoms are typically the most acute?</p> <p>10 A Yes.</p> <p>11 MR. NADELHAFT: Objection; form,</p> <p>12 foundation, calls for expert testimony.</p> <p>13 Q And what stage in the process is that?</p> <p>14 MR. NADELHAFT: Same objections.</p> <p>15 THE WITNESS: Typically day three through</p> <p>16 five or six.</p> <p>17 Q How would you describe Mr. Depp's physical</p> <p>18 state throughout the detox process?</p> <p>19 MR. NADELHAFT: Objection; form,</p> <p>20 foundation.</p> <p>21 THE WITNESS: I don't recall specifics.</p> <p>22 I'd have to refer to my notes.</p>	<p style="text-align: right;">204</p> <p>1 Q Okay. And this is a note you prepared?</p> <p>2 A Yes.</p> <p>3 Q If you need to take a minute and read it</p> <p>4 over, just let me know when you're done, or I can</p> <p>5 go right into it.</p> <p>6 A Okay.</p> <p>7 Q Fair to say that this note reflects that</p> <p>8 Mr. Depp was experiencing discomfort on this date?</p> <p>9 A According to my notes, yes.</p> <p>10 Q It says he was experiencing muscle spasms,</p> <p>11 chills, and pains, right?</p> <p>12 A Correct.</p> <p>13 Q Did you personally observe Mr. Depp in</p> <p>14 this state?</p> <p>15 A According to this note it does not appear</p> <p>16 that I did.</p> <p>17 Q Okay. Are these symptoms typical during a</p> <p>18 detox process?</p> <p>19 A Yes, they are.</p> <p>20 Q Okay.</p> <p>21 MS. MEYERS: Can we please go to the entry</p> <p>22 for August 12, 2014.</p>

<p style="text-align: right;">205</p> <p>1 Q And I believe you looked at this earlier 2 but I'd just like to direct your attention to the 3 last line in this first paragraph: MD arriving 4 this morning and will assess patient. 5 Do you see that? 6 A Where are we on? What – 7 Q So, directing your attention to the 8 August 12, 2014 entry. 9 A Yes, I see it. Sorry. 10 Q All right. And so based on your note it 11 appears that Dr. Kipper arrived on the island on 12 August 12th; is that correct? 13 A Correct. 14 Q Okay. Was the plan always for Dr. Kipper 15 to come down to the island to attend to Mr. Depp? 16 A I don't recall. 17 Q Do you recall any issues in your caring 18 for Mr. Depp prior to Dr. Kipper's arrival? 19 A I don't recall. 20 MR. NADELHAFT: Objection; vague as to the 21 term "issues." 22 Q Do you recall any medical issues arising</p>	<p style="text-align: right;">207</p> <p>1 the portion of the note that starts with 1340. 2 Again, this is military time; is that 3 right? 4 A Correct. 5 Q And I think you testified earlier this is 6 the time you prepared the note, not the time of 7 the events reflected in the note; is that right? 8 A Yes. Sometimes – I mean, I don't recall 9 specifics, but sometimes they were at times and 10 sometimes they were done later. 11 Q So generally speaking, when you prepare 12 these nursing notes, how long after the events 13 reflected in the note was the note actually 14 prepared by you? 15 A It varied. 16 Q Okay. Was it within a day, typically? 17 MR. NADELHAFT: Objection; asked and 18 answered, speculation. 19 THE WITNESS: It varied. 20 Q What would be the longest time after the 21 events reflected in your notes that you would 22 actually document them in a note?</p>
<p style="text-align: right;">206</p> <p>1 with Mr. Depp before Dr. Kipper arrived that 2 caused you concern? 3 A I don't recall. 4 Q If there had been a serious medical issue 5 with Mr. Depp prior to Dr. Kipper's arrival, would 6 that have been reflected in your notes? 7 A Yes. 8 MR. NADELHAFT: Objection; hypothetical to 9 the last question. 10 Go ahead. 11 Q If Mr. Depp's behavior had been 12 unmanageable prior to Dr. Kipper's arrival would 13 that have been reflected in your notes? 14 MR. NADELHAFT: Objection; form, 15 foundation, hypothetical. 16 THE WITNESS: Yes. 17 MS. MEYERS: Can we please go to the next 18 entry for August 13th. 19 Q And, Ms. Lloyd, this is also a note that 20 you prepared? 21 A Yes. 22 Q Now, I'd like to direct your attention to</p>	<p style="text-align: right;">208</p> <p>1 MR. NADELHAFT: Objection; speculation, 2 form, foundation. 3 THE WITNESS: I don't recall. 4 BY MS. MEYERS: 5 Q Okay. So directing your attention back to 6 the portion that starts with 1340. Do you see 7 where it says, Patient's fiancé text to say he 8 wasn't feeling well. MD orders Pheno 9 64.8 milligrams, Neurontin 600 milligrams Stat. 10 Patient and fiancé informed that today and 11 tomorrow will be the most difficult days and to 12 keep in close contact with us? Do you see that? 13 A Yes. 14 Q Do you recall informing Mr. Depp and 15 Ms. Heard that the following days will be the most 16 difficult? 17 A Just what was stated in my notes. 18 Q And why would the next two days be the 19 most difficult, based on your experience? 20 MR. NADELHAFT: Objection; form, 21 foundation, speculation. 22 THE WITNESS: I don't know what days we're</p>

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<p style="text-align: right;">209</p> <p>1 referring to. I'd have to review all my notes to</p> <p>2 see where we were at in the detox.</p> <p>3 MS. MEYERS: Can we please go -- hold on.</p> <p>4 Let me -- bear with me for one moment, please.</p> <p>5 Can we please go to the entry for</p> <p>6 August 17, 2014.</p> <p>7 BY MS. MEYERS:</p> <p>8 Q I'd like to direct your attention to the</p> <p>9 portion of the entry that starts with 1545. And</p> <p>10 specifically, I believe it's -- well, we'll start</p> <p>11 from the beginning. It says here, Patient's</p> <p>12 fiancé came to get MD and RN stating that patient</p> <p>13 was erratic and paranoid. RN and MD found patient</p> <p>14 sitting quietly on his porch. Patient was calm</p> <p>15 and stated he was frustrated with the process of</p> <p>16 detoxing.</p> <p>17 Do you see that?</p> <p>18 A I do.</p> <p>19 Q And this is a note you prepared?</p> <p>20 A Correct.</p> <p>21 Q Do you recall the specific event?</p> <p>22 A I do not.</p>	<p style="text-align: right;">211</p> <p>1 process?</p> <p>2 A I do not. I'm just reading the end of</p> <p>3 that note which suggests going home soon.</p> <p>4 Q Okay.</p> <p>5 THE REPORTER: Counsel, is this an okay</p> <p>6 time to take a little break?</p> <p>7 MS. MEYERS: Absolutely.</p> <p>8 THE VIDEOGRAPHER: The time is 5:08 p.m.</p> <p>9 We are going off the record.</p> <p>10 (Recess was held.)</p> <p>11 THE VIDEOGRAPHER: The time is 5:17 p.m.</p> <p>12 We're now back on the record.</p> <p>13 MS. MEYERS: Could we please bring back up</p> <p>14 Exhibit 23, and specifically go to the August 18,</p> <p>15 2014 entry, which is on DEPP 1677.</p> <p>16 BY MS. MEYERS:</p> <p>17 Q Ms. Lloyd, I'd like to direct your</p> <p>18 attention to -- well, first of all, this is a note</p> <p>19 that you prepared, correct?</p> <p>20 A Correct.</p> <p>21 Q Okay. And I'd like to direct your</p> <p>22 attention to the end of the note which is actually</p>
<p style="text-align: right;">210</p> <p>1 Q Do you have any reason to doubt that</p> <p>2 what's reflected in your note is accurate?</p> <p>3 A Do I have any reason to feel it's</p> <p>4 accurate?</p> <p>5 Q Excuse me. Strike that.</p> <p>6 Do you have any reason to doubt that what</p> <p>7 is reflected in your note is accurate?</p> <p>8 A No.</p> <p>9 Q So when you wrote RN and MD found patient</p> <p>10 sitting quietly on his porch, you believe that's</p> <p>11 an accurate recitation of how you found Mr. Depp</p> <p>12 on this date?</p> <p>13 A Correct.</p> <p>14 MR. NADELHAFT: Objection; form,</p> <p>15 foundation.</p> <p>16 Q When you wrote that he was calm and stated</p> <p>17 he was frustrated, you have no reason to doubt the</p> <p>18 accuracy of that statement?</p> <p>19 MR. NADELHAFT: Same objections.</p> <p>20 THE WITNESS: Correct.</p> <p>21 Q Do you recall approximately how long you</p> <p>22 were on the island with Mr. Depp for his detox</p>	<p style="text-align: right;">212</p> <p>1 on the second page -- or the next page. Do you</p> <p>2 see at the end here where it says, Patient was</p> <p>3 escorted back -- or, escorted to bed? Do you see</p> <p>4 that?</p> <p>5 A Yes.</p> <p>6 Q Would that have been you who escorted</p> <p>7 Mr. Depp to bed?</p> <p>8 A I don't recall.</p> <p>9 Q Okay. You testified earlier, though, that</p> <p>10 you did see Mr. Depp at -- in the home that he was</p> <p>11 staying in on the island, correct?</p> <p>12 A Correct.</p> <p>13 Q And it says, Plan is to leave the island</p> <p>14 tomorrow.</p> <p>15 Do you see that?</p> <p>16 A I do.</p> <p>17 Q And directing your attention to the next</p> <p>18 note, August 19th, do you see that it says, next</p> <p>19 to 2335, Arrived back in LA?</p> <p>20 A Yes.</p> <p>21 Q Okay. So does this accurately -- excuse</p> <p>22 me.</p>

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1 Does this accurately reflect that you left
 2 the island on August 19, 2014?
 3 **A According to these notes, yes.**
 4 Q Okay. I'd like to direct your attention
 5 to the August 20, 2014 entry which starts on the
 6 next page. And then if you go to the next page as
 7 well you can see that there's another entry for
 8 August 20, 2014. Do you see that?
 9 **A Oh, yeah. Yup.**
 10 Q Okay. On this page here I'd like to
 11 direct your attention to the portion that starts
 12 with 1230. Do you see that?
 13 **A Yes.**
 14 Q Okay. Now, it says here, RN and MD spend
 15 time talking with patient.
 16 Do you see that?
 17 **A I do.**
 18 Q This would have been you and Dr. Kipper,
 19 correct?
 20 **A Correct.**
 21 Q And does this reflect that you spoke with
 22 Mr. Depp in person?

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1 **A I don't recall. I would -- yes.**
 2 Q And the rest -- the note goes on to say,
 3 Patient expressed frustration with the detox
 4 process and with not liking how the phenobarb was
 5 making him feel. Initially, he stated he was done
 6 with the process and no longer wanted MD and RN's
 7 services. After processing his feelings and
 8 realizing how far he had come and that part of his
 9 wanting to give up was due to tension between him
 10 and his fiancé. Patient, Fiancé, RN and MD came
 11 up with a plan for Fiancé to take a few days for
 12 herself and patient was willing to continue
 13 treatment but was going to refuse Phenobarbital
 14 from this point forward.
 15 Do you see that?
 16 **A I do.**
 17 Q Okay. Did I read that correctly?
 18 **A Yes.**
 19 Q Okay. Do you recall tensions between
 20 Mr. Depp and Ms. Heard at this stage in his detox
 21 process?
 22 **A Yes.**

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1 Q And what do you recall about that?
 2 **A I recall Johnny feeling that she was**
 3 **trying to interfere.**
 4 Q In what way did he feel she was trying to
 5 interfere?
 6 MR. NADELHAFT: Objection to the extent it
 7 calls for hearsay.
 8 THE WITNESS: By reporting to us things
 9 that he didn't feel were true.
 10 Q Can you think of a specific instance where
 11 Ms. Heard reported something to you that was --
 12 you found out was -- later was not true?
 13 MR. NADELHAFT: Objection; form,
 14 foundation, hearsay.
 15 MS. HICKOX: Join.
 16 THE WITNESS: I can't -- I cannot remember
 17 specifics.
 18 Q Do you recall the plan for Ms. Heard to
 19 take a few days for herself?
 20 **A I don't recall specifics.**
 21 Q But you do recall there being tension
 22 between Mr. Depp and Ms. Heard around this time?

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1 **A Yes.**
 2 Q And do you recall that having an impact on
 3 Mr. Depp's treatment?
 4 **A I don't recall specifics.**
 5 Q Did you ever observe Ms. Heard interfering
 6 in Mr. Depp's treatment?
 7 MR. NADELHAFT: Objection; form,
 8 foundation.
 9 THE WITNESS: What's specifically meant by
 10 interfering in treatment?
 11 Q Well, you testified earlier that you --
 12 that Mr. Depp felt that Ms. Heard was interfering
 13 in his relationship with you and Dr. Kipper,
 14 correct?
 15 MR. NADELHAFT: Objection;
 16 mischaracterizes the testimony.
 17 THE WITNESS: I don't remember my exact --
 18 what I said.
 19 Q So let's go back to that, then.
 20 So how would you describe the tension
 21 between Mr. Depp and Ms. Heard during this time
 22 period?

Conducted on March 8, 2022

<p>1 MR. NADELHAFT: Objection; form, 2 foundation. 3 THE WITNESS: I don't remember specifics. 4 Just that he didn't feel what she was saying to us 5 was being -- or that she was portraying what was 6 really happening to us properly. 7 BY MS. MEYERS: 8 Q Okay. And you -- 9 MR. NADELHAFT: (Inaudible) -- statement. 10 Go ahead. 11 Q And do you recall having any independent 12 knowledge of whether -- strike that. Okay. 13 MS. MEYERS: Let's go on to the entry for 14 August 25th, please. 15 Q First of all, is this a note that you 16 prepared? 17 A It is. 18 Q Directing your attention to the report 19 that starts 1900. The first line says, Meeting at 20 MD's house was quite stressful for patient. 21 Do you see that? 22 A I do.</p>	<p>217 219 1 August 27, 2014, which starts on DEPP 1687 -- or 2 -86, excuse me. 1686, yup. 3 Again, this is an entry you prepared? 4 A It is. 5 Q Okay. Do you see where it says, Received 6 text from patient's sister that patient had been 7 recording music with his friend until 0500 and did 8 not go to sleep until 0700 and is currently 9 sleeping? 10 A Yes. 11 Q And who is Mr. Depp's sister that's 12 referred to here? 13 A Christi. 14 Q And at this time had you met Christi 15 before? 16 A I don't recall. 17 Q Have you met Christi before? 18 A Yes. 19 Q How many times? 20 A I don't know. 21 Q More than once? 22 A More than once, yes.</p>
<p>218 1 Q Do you recall attending a meeting with 2 Mr. Depp at Dr. Kipper's house? 3 A I don't recall. 4 Q The next line says, Him and his fiancé are 5 having a hard time communicating and understanding 6 each other's point of view and feelings. 7 Do you see that? 8 A I do. 9 Q Do you recall any specifics about this 10 situation? 11 A I do not. 12 Q A couple sentences down it says, Plan is 13 for fiancé to start therapy tomorrow. 14 Do you see that? 15 A Yes. 16 Q Do you recall that Ms. Heard started 17 therapy shortly after Mr. Depp's detox process? 18 A I don't recall. 19 Q Do you have any understanding as to why 20 Ms. Heard was starting therapy? 21 A I do not. 22 Q Directing your attention to the entry for</p>	<p>220 1 Q At this time had you communicated with 2 Christi about Mr. Depp's treatment before? 3 A I don't recall. 4 Q Okay. The entry goes on to say that, 5 Sister stated that patient and his fiancé has a 6 disagreement last night and that patient was able 7 to remain calm and handled the situation 8 appropriately. 9 Do you see that? 10 A Yes. 11 Q Do you recall Ms. -- do you recall Christi 12 telling you that? 13 A I do not. 14 MR. NADELHAFT: Objection; hearsay, form, 15 foundation. 16 Q Now, do you see the portion of the note 17 that starts with 1330? 18 A I do. 19 Q The second line reads: Patient expressing 20 feeling about argument with fiancé and feels 21 relationship is putting unwanted stress on him 22 right now.</p>

221

1 Do you see that?
 2 **A I do.**
 3 Q Do you recall this exchange with Mr. Depp?
 4 MR. NADELHAFT: Objection; hearsay.
 5 Q I'm sorry, I didn't catch that.
 6 **A I'm sorry. I do not.**
 7 Q Okay. Based on this note, do you -- can
 8 you tell whether this was a conversation you had
 9 in person with Mr. Depp?
 10 **A Based on this note, yes.**
 11 Q Do you recall on other occasions Mr. Depp
 12 expressing to you that his relationship was
 13 putting unwanted stress on him?
 14 MR. NADELHAFT: Objection; hearsay, form,
 15 foundation, vague.
 16 THE WITNESS: I'd have to review my notes.
 17 Q Okay. Directing your attention down to
 18 the portion of the note that starts with 2130. It
 19 says, Patient back home. Per patient he had a
 20 long conversation with fiancé and they both
 21 understand that right now is a time to work on
 22 themselves as individuals. Patient's fiancé now

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1 has an RN to help her anxiety and to monitor her
 2 while she's starting a new mood stabilizer
 3 medication.
 4 Do you see that?
 5 **A I do.**
 6 Q Okay. Who was -- I believe you testified
 7 to this earlier, Ms. Heard's nurse was Erin
 8 Boerum; is that right?
 9 **A Correct.**
 10 Q And Ms. Boerum was an employee of yours;
 11 is that correct?
 12 **A She was an independent contractor.**
 13 Q Okay. But you placed her with Dr. Kipper;
 14 is that right?
 15 **A Correct.**
 16 Q Do you recall when Ms. Boerum was assigned
 17 to Ms. Heard?
 18 **A I do not recall.**
 19 Q Do you have any understanding as to why
 20 Ms. Heard needed a nurse?
 21 **A Other than what my notes state, I do not.**
 22 Q Okay. Do you recall witnessing Ms. Heard

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1 being anxious or having anxiety?
 2 **A I do not recall.**
 3 Q Now, the last line here says, Patient
 4 feels this will take some of the stress off their
 5 relationship and in return --
 6 MS. MEYERS: If we can go to the next
 7 page.
 8 Q -- take some stress off of him. Did I
 9 read that correctly?
 10 **A You did.**
 11 Q Do you recall why Mr. Depp felt that
 12 Ms. Heard having a nurse would reduce the stress
 13 on their relationship?
 14 MR. NADELHAFT: Objection; form,
 15 foundation, hearsay.
 16 THE WITNESS: I do not recall.
 17 Q From your perspective, was it important
 18 for Mr. Depp's treatment that his stress be
 19 reduced?
 20 **A Yes.**
 21 Q And why is that?
 22 **A Any patient going through detox or**

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1 **changes, it's always important to relieve as much**
 2 **stress as you can from them.**
 3 MS. MEYERS: Let's go to the entry for
 4 September 10th, please, which is on DEPP 1694 and
 5 continues on to 1695.
 6 Q Ms. Lloyd, again, this is a note that you
 7 prepared, correct?
 8 **A (Inaudible response.)**
 9 THE REPORTER: Ms. Lloyd, did you answer?
 10 I didn't hear anything.
 11 THE WITNESS: I thought I did.
 12 Q Oh. Apologies. I'm sorry.
 13 September the -- September 10, 2014 entry,
 14 this is your entry, correct, you prepared this?
 15 **A Correct. Sorry.**
 16 Q Sorry. And if I can direct your attention
 17 to the portion that starts with 2330 which is
 18 actually on the next page. The first line says,
 19 Met with patient. He complained of body aches and
 20 nausea.
 21 Do you see that?
 22 **A I do.**

<p style="text-align: right;">225</p> <p>1 Q And does this reflect that you were</p> <p>2 physically with Mr. Depp at this time?</p> <p>3 A It would, yes.</p> <p>4 Q A couple sentences down it says -- and</p> <p>5 this portion is highlighted here -- While RN was</p> <p>6 visiting patient, fiancé came in and tried to</p> <p>7 start argument with him. Patient was able to stay</p> <p>8 calm and talk his fiancé down.</p> <p>9 Do you see that?</p> <p>10 A I do.</p> <p>11 Q Do you recall the incident reflected in</p> <p>12 this note?</p> <p>13 A I do not.</p> <p>14 Q Do you recall any instances where you</p> <p>15 witnessed Ms. Heard try to start a fight with</p> <p>16 Mr. Depp?</p> <p>17 A Yes.</p> <p>18 MR. NADELHAFT: Objection; form,</p> <p>19 foundation, speculation.</p> <p>20 Q How many instances do you remember?</p> <p>21 MR. NADELHAFT: Same objections.</p> <p>22 THE WITNESS: I don't recall specific</p>	<p style="text-align: right;">227</p> <p>1 A I wasn't there previously.</p> <p>2 Q And what's the other instance you</p> <p>3 remember?</p> <p>4 A I can't remember specifics.</p> <p>5 Q Do you have any reason to doubt the</p> <p>6 accuracy of what's reflected in your note here?</p> <p>7 A No.</p> <p>8 Q Do you have any understanding as to what</p> <p>9 you meant when you said, Patient was able to</p> <p>10 remain calm -- was able to stay calm -- excuse</p> <p>11 me -- and talk his fiancé down?</p> <p>12 A I don't recall the events of that note.</p> <p>13 Q Have you seen Mr. Depp and Ms. Heard get</p> <p>14 into a fight before this date?</p> <p>15 A I don't recall.</p> <p>16 MR. NADELHAFT: Objection; asked and</p> <p>17 answered.</p> <p>18 Q When you've seen Mr. Depp and Ms. Heard in</p> <p>19 a fight, how does Mr. -- how did Mr. Depp react?</p> <p>20 MR. NADELHAFT: Objection; form,</p> <p>21 foundation.</p> <p>22 THE WITNESS: I don't recall specifics</p>
<p style="text-align: right;">226</p> <p>1 numbers.</p> <p>2 BY MS. MEYERS:</p> <p>3 Q Do you remember at least one?</p> <p>4 A Yes.</p> <p>5 Q Do you remember more than one?</p> <p>6 A Yes.</p> <p>7 MR. NADELHAFT: Objection; speculation.</p> <p>8 Q More than two?</p> <p>9 MR. NADELHAFT: Same objection.</p> <p>10 THE WITNESS: I don't recall specific</p> <p>11 numbers.</p> <p>12 Q Okay. What do you remember about that</p> <p>13 first instance that you can remember?</p> <p>14 A I remember one night trying to leave the</p> <p>15 penthouse and Amber standing in the elevator and</p> <p>16 not letting us leave.</p> <p>17 Q Why wasn't she letting you leave?</p> <p>18 MR. NADELHAFT: Objection; speculation.</p> <p>19 THE WITNESS: I -- I -- she didn't want</p> <p>20 him to leave.</p> <p>21 Q Had they been fighting previous to that</p> <p>22 point?</p>	<p style="text-align: right;">228</p> <p>1 and -- like, more specific question.</p> <p>2 MS. MEYERS: Let's go to the entry for</p> <p>3 September 12th, please. It should be on the next</p> <p>4 page. Yup.</p> <p>5 BY MS. MEYERS:</p> <p>6 Q And this is a note that you prepared as</p> <p>7 well, Ms. Lloyd?</p> <p>8 A It is, correct.</p> <p>9 Q Okay. The first line here says, RN and MD</p> <p>10 visited patient at work.</p> <p>11 Do you see that?</p> <p>12 A I do.</p> <p>13 Q And so this reflects that both you and</p> <p>14 Dr. Kipper went and saw Mr. Depp; is that right?</p> <p>15 A Correct.</p> <p>16 Q And the entry states here: Patient</p> <p>17 expressed some concerns with fiancé's behavior and</p> <p>18 how it is adding stress to his life.</p> <p>19 Do you see that?</p> <p>20 A I do.</p> <p>21 Q Do you recall this -- Mr. Depp saying this</p> <p>22 to you in this instance?</p>

<p style="text-align: right;">229</p> <p>1 MR. NADELHAFT: Objection; hearsay.</p> <p>2 THE WITNESS: I do not.</p> <p>3 Q Do you have any reason to doubt the</p> <p>4 accuracy of what's reflected in your note?</p> <p>5 A I do not.</p> <p>6 MS. MEYERS: Could we please go to the</p> <p>7 entry for October 22, 2014, which starts on 1717,</p> <p>8 and continues on to DEPP 1718.</p> <p>9 THE WITNESS: My notes are different.</p> <p>10 What's the top of the -- can I see the top of that</p> <p>11 just so that I know what I'm looking... Okay.</p> <p>12 Okay.</p> <p>13 Q First of all, this is also a note that you</p> <p>14 prepared, correct?</p> <p>15 A Correct.</p> <p>16 Q And if you want to take a minute and read</p> <p>17 through the note; I know it goes on for two pages.</p> <p>18 A Okay. Oh.</p> <p>19 Q Just let me know when you've read through</p> <p>20 it.</p> <p>21 A Okay.</p> <p>22 Q Fair to say that this note reflects that</p>	<p style="text-align: right;">231</p> <p>1 the entry that's on the next page and begins with</p> <p>2 1530. It states here, He requested an emergency</p> <p>3 session with the psychiatrist to discuss feeling</p> <p>4 about arguments with fiancé and would like some</p> <p>5 tools to help him feel with his -- to help him</p> <p>6 feel with his emotions.</p> <p>7 Do you see that?</p> <p>8 A I do.</p> <p>9 Q Do you recall Mr. Depp and Ms. Heard</p> <p>10 having a fight on this trip in Georgia?</p> <p>11 A I do not.</p> <p>12 Q Do you have any reason to doubt that this</p> <p>13 portion of the note is accurate?</p> <p>14 A No.</p> <p>15 Q I believe you testified to this earlier,</p> <p>16 do you recall -- but I'll ask again just to be</p> <p>17 clear. Do you recall who Mr. Depp's psychiatrist</p> <p>18 was at this time?</p> <p>19 A I do not.</p> <p>20 Q Do you recall why Mr. Depp started seeing</p> <p>21 a psychiatrist?</p> <p>22 A I do not.</p>
<p style="text-align: right;">230</p> <p>1 you and Mr. Depp were in Georgia when the events</p> <p>2 in this note occurred?</p> <p>3 A I think we were -- at the end it says, Now</p> <p>4 in Georgia. The -- I would -- I don't recall, but</p> <p>5 it -- a travel day.</p> <p>6 Q Well, do you see above that where it says</p> <p>7 10/22, and then below it it says, Now in Georgia?</p> <p>8 A Yeah.</p> <p>9 Q Okay. So based on your notes, you were in</p> <p>10 Georgia on October 22, 2015?</p> <p>11 A Correct.</p> <p>12 Q Okay. Do you recall being in Georgia with</p> <p>13 Mr. Depp?</p> <p>14 A Yes.</p> <p>15 Q Do you recall who else was with you in</p> <p>16 Georgia?</p> <p>17 A I don't recall who was with us, but I --</p> <p>18 the purpose of the trip was to visit Amber on</p> <p>19 location.</p> <p>20 Q Okay. So Amber was in Georgia as well?</p> <p>21 A Yes.</p> <p>22 Q Okay. Now, directing your attention to</p>	<p style="text-align: right;">232</p> <p>1 Q Directing your attention down to the</p> <p>2 portion of the note that starts with 2010. It</p> <p>3 says here, Patient spoke to a psychiatrist for</p> <p>4 50 minutes and was open and honest with his</p> <p>5 feelings. He feels better after conversation but</p> <p>6 also feels he is in a "no win situation" with</p> <p>7 fiancé.</p> <p>8 Do you see that?</p> <p>9 A I -- I'm kind of lost where we're at right</p> <p>10 now.</p> <p>11 Q Oh, sorry.</p> <p>12 A Oh, 1530. Yeah, I see it. Sorry.</p> <p>13 Q Okay. Does this reflect that you were</p> <p>14 present with Mr. Depp when he spoke to his</p> <p>15 psychiatrist?</p> <p>16 A I don't remember if it was based on him</p> <p>17 telling me or if I was present.</p> <p>18 Q Do you recall Mr. Depp ever expressing to</p> <p>19 you that he felt he was in a "no win situation"</p> <p>20 with Ms. Heard?</p> <p>21 MR. NADELHAFT: Objection; hearsay.</p> <p>22 THE WITNESS: I don't recall the specific</p>

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1 words.

2 BY MS. MEYERS:

3 Q But you -- you wrote them in your nursing

4 notes, correct?

5 A (Nonverbal response.)

6 Q Do you see at the box -- so the -- still

7 in this portion that starts with 2010, do you see

8 where it says, Plan is for patient and fiancé to

9 go to dinner this evening. Patient is feeling

10 exhausted and wants to stay home but does not want

11 to upset fiancé?

12 Do you see that?

13 A We're on the same page?

14 Q Yes. We're still in the portion of the

15 note that starts with 2010.

16 A Twenty- -- okay. Yes, yup.

17 Q Do you recall this specific incident?

18 A I do not.

19 Q Do you have any understanding as to why

20 Mr. Depp would be concerned about upsetting his

21 fiancée?

22 A I do not.

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1 Q Okay.

2 MS. MEYERS: If we can go on to the next

3 entry, which is on the same page, 1023.

4 Q And this is also a note you prepared,

5 Ms. Lloyd?

6 A It is.

7 Q Okay. It says here you -- text patient to

8 see if RN could come by and check in.

9 Do you see that?

10 A I did -- I do.

11 Q Why did you want to check in on Mr. Depp?

12 A I don't recall.

13 Q Were you ever concerned about Mr. Depp

14 when he and Ms. Heard were in arguments?

15 A Yes.

16 Q Why were you concerned?

17 A Their arguments were a trigger for him

18 emotionally.

19 Q Any other reasons?

20 A No.

21 Q What do you mean by "a trigger for him

22 emotionally"?

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1 A It would cause him to be upset, add

2 stress.

3 Q The next portion of this note says, When

4 RN arrived in the room patient was agitated and

5 felt fiancé was using the term mania to express --

6 explain his behavior and excuse herself from any

7 fault during arguments. Do you see that?

8 A Yup.

9 Q Do you have any -- did you ever hear

10 Ms. Heard use the term mania to describe Mr. Depp?

11 A I don't recall if that was -- I heard it

12 from her or heard that she was saying it to

13 others.

14 Q But you do have some recollection of

15 hearing that Ms. Heard was using that word,

16 whether it was directly from her or from others?

17 A Yes.

18 Q The note goes on to say, Patient was upset

19 by this label. RN processes feelings with patient

20 and he was able to see fiancé's negative

21 behaviors.

22 Did I read that correctly?

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1 A Yes.

2 Q Do you have any recollection of what you

3 meant when you wrote that?

4 A I do not.

5 Q You don't have any understanding of what

6 "fiancé's negative behaviors" refers to?

7 MR. NADELHAFT: Objection; asked and

8 answered, speculation, form, foundation.

9 THE WITNESS: I don't recall specifics.

10 Q Do you recall generally?

11 MR. NADELHAFT: Same objections.

12 THE WITNESS: Yes.

13 Q And what do you recall?

14 A At times -- what's the word -- she would

15 almost try to instigate him.

16 Q And when you say "she," you're referring

17 to Ms. Heard?

18 A Yes.

19 Q Did you ever witness that personally?

20 A Yes.

21 Q On more than one occasion?

22 MR. NADELHAFT: Objection; speculation.

<p>1 THE WITNESS: Yes.</p> <p>2 Q Ballpark, how many times did you witness</p> <p>3 that during their -- during the time you cared for</p> <p>4 Mr. Depp?</p> <p>5 MR. NADELHAFT: Objection; speculation,</p> <p>6 form, foundation.</p> <p>7 THE WITNESS: I don't recall a number.</p> <p>8 Q More than five?</p> <p>9 MR. NADELHAFT: Same objections.</p> <p>10 THE WITNESS: I don't recall.</p> <p>11 Q When you say Ms. Heard would try to</p> <p>12 instigate him, what do you mean?</p> <p>13 A I remember an argument or being in there</p> <p>14 when he was going from room to room trying to</p> <p>15 remove himself from a situation, and she would</p> <p>16 just follow him from room to room and not give him</p> <p>17 his space.</p> <p>18 Q And that's one specific incident --</p> <p>19 instance that you remember?</p> <p>20 A Yes.</p> <p>21 Q Do you remember seeing that type of</p> <p>22 behavior on other occasions?</p>	<p>237</p> <p>1 emotions. Did I read that right?</p> <p>2 A Yes.</p> <p>3 Q Based on this note, is that something</p> <p>4 Mr. Depp would have told you?</p> <p>5 MR. NADELHAFT: Objection; hearsay.</p> <p>6 THE WITNESS: Based on this note it</p> <p>7 appears so.</p> <p>8 Q It looks like there's another note for</p> <p>9 November 3rd below this one. Do you see that?</p> <p>10 A Yes.</p> <p>11 Q And it continues on to the next page,</p> <p>12 which is 1- -- DEPP 1722.</p> <p>13 MS. MEYERS: If we could go there, please.</p> <p>14 Q And, Ms. Lloyd, directing your attention</p> <p>15 to the portion that starts with 1700. Do you see</p> <p>16 where it says, RN went back to patient's house.</p> <p>17 He was chatting with a friend and is feeling</p> <p>18 stressed about his relationship?</p> <p>19 Do you see that?</p> <p>20 A I do.</p> <p>21 Q And it goes on to say, He feels she is not</p> <p>22 being truthful with him and he is not sure how to</p>
<p>238</p> <p>1 A Yes.</p> <p>2 Q Are you aware of -- any of the fights that</p> <p>3 we just went through, are you aware that any of</p> <p>4 them became physical?</p> <p>5 A No.</p> <p>6 Q From what you observed, what was the cause</p> <p>7 of the friction between Mr. Depp and Ms. Heard</p> <p>8 during this time?</p> <p>9 MR. NADELHAFT: Objection; form,</p> <p>10 foundation, speculation, hearsay.</p> <p>11 THE WITNESS: I don't know.</p> <p>12 MS. MEYERS: Could we please go to the</p> <p>13 entry of November 3, 2014, which is on DEPP</p> <p>14 172- --</p> <p>15 AV TECHNICIAN: 172... Sorry, Counsel.</p> <p>16 MS. MEYERS: Yes, 1721.</p> <p>17 Q Ms. Lloyd, this is also a note that you</p> <p>18 prepared?</p> <p>19 A Correct.</p> <p>20 Q And it says here you arrived at Mr. Depp's</p> <p>21 home and he was, quote, focused on relationship</p> <p>22 with fiancé and is struggling with conflicted</p>	<p>240</p> <p>1 comfort her about this when -- excuse me --</p> <p>2 confront her about this when she arrives home. Do</p> <p>3 you see -- do you see that?</p> <p>4 A Yes.</p> <p>5 Q And the "she" here refers to Ms. Heard; is</p> <p>6 that right?</p> <p>7 A Correct.</p> <p>8 Q Do you remember this exchange with</p> <p>9 Mr. Depp?</p> <p>10 MR. NADELHAFT: Objection; hearsay.</p> <p>11 THE WITNESS: No.</p> <p>12 Q Do you have any reason to doubt the</p> <p>13 accuracy of the note?</p> <p>14 A I do not.</p> <p>15 MS. MEYERS: If we could turn to the entry</p> <p>16 for November 17, 2014 which begins on DEPP 1723,</p> <p>17 which is the next page.</p> <p>18 Q Ms. Lloyd, do you see at the very bottom</p> <p>19 it says 11/17?</p> <p>20 A Yes.</p> <p>21 Q Okay. And then I think the entry itself</p> <p>22 is on the next page.</p>

<p style="text-align: right;">241</p> <p>1 MS. MEYERS: Yes. Thank you.</p> <p>2 Q This is also a note you prepared?</p> <p>3 A Correct.</p> <p>4 Q And this says, RN and MD went to patient's</p> <p>5 house to assess him.</p> <p>6 Do you see that?</p> <p>7 A I do.</p> <p>8 Q And so, again, this reflects that you and</p> <p>9 Dr. Kipper went to see Mr. Depp?</p> <p>10 A Correct.</p> <p>11 Q Do you have any recollection of why Mr. --</p> <p>12 or, excuse me -- why Dr. Kipper was visiting with</p> <p>13 Mr. Depp at this time?</p> <p>14 A I do not.</p> <p>15 Q Okay. The next line says, Patient</p> <p>16 appeared anxious and depressed over relationship</p> <p>17 issues.</p> <p>18 Do you see that?</p> <p>19 A I do.</p> <p>20 Q And then it says, Patient continues to be</p> <p>21 ambivalent about relationship status.</p> <p>22 Do you see that?</p>	<p style="text-align: right;">243</p> <p>1 Q Did Dr. Kipper attend the wedding?</p> <p>2 A He did.</p> <p>3 Q And did Erin Boerum attend the wedding?</p> <p>4 A She did.</p> <p>5 Q Do you recall any discussions of a</p> <p>6 prenuptial agreement between Mr. Depp and</p> <p>7 Ms. Heard before they got married?</p> <p>8 MR. NADELHAFT: Objection; hearsay.</p> <p>9 THE WITNESS: Yes.</p> <p>10 Q And what do you recall?</p> <p>11 MR. NADELHAFT: Objection; hearsay.</p> <p>12 THE WITNESS: I don't recall specifics.</p> <p>13 Q What do you recall generally?</p> <p>14 MR. NADELHAFT: Same objections.</p> <p>15 THE WITNESS: I only recall what Johnny</p> <p>16 told me about the conversation.</p> <p>17 Q And what was that?</p> <p>18 MR. NADELHAFT: Objection; hearsay.</p> <p>19 THE WITNESS: That she didn't take it</p> <p>20 well.</p> <p>21 Q Didn't take what well?</p> <p>22 A The idea of sign- --</p>
<p style="text-align: right;">242</p> <p>1 A I do.</p> <p>2 Q Do you recall Mr. Depp expressing these</p> <p>3 sentiments to you?</p> <p>4 MR. NADELHAFT: Objection; hearsay.</p> <p>5 THE WITNESS: I don't recall specific</p> <p>6 conversations.</p> <p>7 Q Okay. But you also -- but this is what</p> <p>8 you wrote in your notes, correct?</p> <p>9 A (Inaudible.)</p> <p>10 Q I'm sorry, I didn't catch that.</p> <p>11 A Correct. Sorry.</p> <p>12 Q Sorry.</p> <p>13 Do you recall when Mr. Depp and Ms. Heard</p> <p>14 got married?</p> <p>15 A I don't recall the date.</p> <p>16 Q Okay. But you said -- you testified</p> <p>17 earlier that you did attend the wedding?</p> <p>18 A Correct.</p> <p>19 Q Were you there to provide nursing</p> <p>20 services?</p> <p>21 A I don't really recall if I was a guest</p> <p>22 or -- I don't think they made that clear to me.</p>	<p style="text-align: right;">244</p> <p>1 MR. NADELHAFT: Objection; hearsay.</p> <p>2 Q Sorry, I didn't hear the end of that.</p> <p>3 A The idea of having to sign a prenup.</p> <p>4 Q Okay. Did Johnny tell you that he asked</p> <p>5 Ms. Heard to sign a prenup?</p> <p>6 MR. NADELHAFT: Objection; hearsay.</p> <p>7 THE WITNESS: I don't recall specifics.</p> <p>8 Q But you recall Johnny telling you that</p> <p>9 Ms. Heard didn't want to sign a prenup?</p> <p>10 MR. NADELHAFT: Objection; hearsay.</p> <p>11 THE WITNESS: Yes.</p> <p>12 Q But when you say she didn't take that</p> <p>13 well, what are you referring to?</p> <p>14 MR. NADELHAFT: Objection; hearsay.</p> <p>15 THE WITNESS: From what Johnny said her</p> <p>16 reaction was when he asked -- when they spoke</p> <p>17 about the prenup.</p> <p>18 Q Was she sad or -- like, what was her --</p> <p>19 what was the emotion that he described to you?</p> <p>20 MR. NADELHAFT: Objection; hearsay.</p> <p>21 THE WITNESS: I don't recall specifics.</p> <p>22 Q Did you personally observe any discussions</p>

<p style="text-align: right;">245</p> <p>1 between Mr. Depp and Ms. Heard about the</p> <p>2 prenuptial agreement?</p> <p>3 MR. NADELHAFT: Objection; hearsay.</p> <p>4 THE WITNESS: I don't recall.</p> <p>5 Q Do you recall that in January of 2015</p> <p>6 Mr. Depp and Ms. Heard traveled to Japan together?</p> <p>7 A I don't recall.</p> <p>8 Q Do you recall traveling to Japan with</p> <p>9 Mr. Depp?</p> <p>10 A I recall being in Japan, yes.</p> <p>11 Q Okay. Do you remember anything specific</p> <p>12 about that trip?</p> <p>13 A I do not.</p> <p>14 Q Do you recall Mr. Depp and Ms. Heard</p> <p>15 having a fight on a plane?</p> <p>16 A I recall a fight on a plane, but I don't</p> <p>17 know the time it was around.</p> <p>18 Q What do you remember about that fight?</p> <p>19 A It was another instance where he was</p> <p>20 sitting at a table and not wanting to talk and she</p> <p>21 wouldn't leave the table.</p> <p>22 Q What was she doing?</p>	<p style="text-align: right;">247</p> <p>1 to the March 1, 2015 e-mail from Dr. Kipper at</p> <p>2 2:10 p.m. Do you see that?</p> <p>3 A I do.</p> <p>4 Q And I think Adam went over this with you</p> <p>5 earlier, but it says here, Debbie is worried and</p> <p>6 somewhat exhausted and he is doing what he wants</p> <p>7 since his friend Marilyn Manson is there visiting.</p> <p>8 The big problem has been his sleep issue.</p> <p>9 Do you see that?</p> <p>10 A I do.</p> <p>11 Q Do you recall Mr. Depp having issues with</p> <p>12 his sleep while -- when he was in Australia?</p> <p>13 A Not specifically in Australia.</p> <p>14 Q Do you recall Mr. Depp having issues with</p> <p>15 his sleep generally?</p> <p>16 A Yes.</p> <p>17 Q And what issues were those?</p> <p>18 A He had a hard time sleeping and staying on</p> <p>19 a sleep schedule.</p> <p>20 Q And that persisted through -- how -- how</p> <p>21 often -- strike that.</p> <p>22 Did that persist throughout the time you</p>
<p style="text-align: right;">246</p> <p>1 A She wouldn't leave the table. And he was</p> <p>2 saying, you know, Please just -- let's -- just go</p> <p>3 away.</p> <p>4 Q And what was she saying?</p> <p>5 A I don't remember.</p> <p>6 MR. NADELHAFT: Objection; hearsay.</p> <p>7 THE WITNESS: I don't remember her words.</p> <p>8 Q How was her tone?</p> <p>9 MR. NADELHAFT: Same objections.</p> <p>10 THE WITNESS: I -- I don't recall.</p> <p>11 Q Okay. You spoke with Mr. Nadelhaft about</p> <p>12 this earlier, but at some point you traveled to</p> <p>13 Australia with Mr. Depp, right?</p> <p>14 A Correct.</p> <p>15 Q And at some point while you were in --</p> <p>16 strike that.</p> <p>17 MS. MEYERS: Can we pull up what has been</p> <p>18 previously marked as Exhibit 14.</p> <p>19 Q Ms. Lloyd, do you remember seeing this</p> <p>20 e-mail earlier today?</p> <p>21 A I do.</p> <p>22 Q Okay. I'd like to direct your attention</p>	<p style="text-align: right;">248</p> <p>1 treated Mr. Depp?</p> <p>2 A I don't recall how long it was for.</p> <p>3 Q Do you recall his sleep issues ever being</p> <p>4 resolved?</p> <p>5 A I don't recall.</p> <p>6 Q Do you recall any other medical issues</p> <p>7 that Mr. Depp was having in Australia?</p> <p>8 A I can't remember specifically what was</p> <p>9 during what time.</p> <p>10 MS. MEYERS: This might be a good time for</p> <p>11 a break, if every- -- if anyone would appreciate</p> <p>12 one. If not, we can keep going. But I think</p> <p>13 we've been going about another hour. Is that okay</p> <p>14 with everyone?</p> <p>15 MS. HICKOX: Sure.</p> <p>16 THE REPORTER: I would love that.</p> <p>17 THE VIDEOGRAPHER: The time is 6:04 p.m.</p> <p>18 We are going off the record.</p> <p>19 (Recess was held.)</p> <p>20 THE VIDEOGRAPHER: The time is 6:13 p.m.</p> <p>21 We're now back on the record.</p> <p>22 BY MS. MEYERS:</p>

<p style="text-align: right;">249</p> <p>1 Q Ms. Lloyd, when you were in Australia with 2 Mr. Depp, did you see where he was staying? 3 A Yes. 4 Q And how many times did you go to that 5 property? 6 A I don't recall specific numbers. 7 Q Fair to say you went there multiple times, 8 though? 9 A Yes. 10 Q How would you describe the property that 11 he was staying on? 12 A A beautiful home. 13 Q Did it have any security? 14 A I don't recall if his security stayed on 15 the property with him or not. 16 Q Did the house have balconies? 17 A I don't recall. 18 Q You talked about this with Mr. Nadelhaft 19 earlier. At some point in Australia you learned 20 that Mr. Depp had injured his finger, correct? 21 A Correct. 22 Q And Dr. Kipper was already in Australia at</p>	<p style="text-align: right;">251</p> <p>1 Q And I believe you testified you don't 2 recall whether Ms. Heard was at the house when you 3 went to attend to Mr. Depp, correct? 4 A Correct. 5 Q Okay. Do you remember seeing Ms. Heard in 6 Australia? 7 A Yes. 8 Q Did you ever see any injuries on Ms. Heard 9 when she was in Australia? 10 MR. NADELHAFT: Objection; form, 11 foundation. 12 THE WITNESS: Yes. 13 Q What did you see? 14 A A bruise on her arm. 15 Q Anything else? 16 A No. 17 Q Did she have any injuries to her face that 18 you can recall? 19 A Not that I recall. 20 Q Any cuts or abrasions that you can recall? 21 A Not that I recall. 22 Q Do you recall Ms. Heard ever seeking</p>
<p style="text-align: right;">250</p> <p>1 that time? 2 A Correct. 3 Q And you testified earlier that you and 4 Dr. Kipper went to see Mr. Depp after he injured 5 his finger, correct? 6 A Correct. 7 Q Do you recall anything about Mis- -- what 8 do you recall about Mr. Depp's physical appearance 9 when you first saw him? 10 MR. NADELHAFT: Objection; asked and 11 answered. 12 THE WITNESS: I don't recall specifics. 13 Q What do you remember about his demeanor, 14 if anything? 15 MR. NADELHAFT: Objection; asked and 16 answered. 17 THE WITNESS: I don't remember the events 18 of when I first arrived. 19 Q But you did see Mr. Depp at that time, 20 correct? 21 A I can't recall when I initially saw him 22 after the finger event.</p>	<p style="text-align: right;">252</p> <p>1 medical treatment from you while you -- while she 2 was in Australia? 3 A I do not recall her ever seeking medical 4 treatment from me. 5 Q At the time that Mr. Depp injured his 6 finger, Ms. Heard was a patient of Dr. Kipper, 7 correct? 8 A I'm not sure. 9 Q Do you recall whether Ms. Boerum was 10 already assigned to Ms. Heard? 11 A I don't recall if she was working with her 12 at that time. 13 MS. MEYERS: Can we turn back to the 14 nursing notes which is Exhibit 23. And 15 specifically the entry for March 7th, which is on 16 1732. 17 THE WITNESS: Is this March 7th of 2014? 18 March -- 19 Q Yeah. It says 3/7/15. Do you see that? 20 A Oh, so '15. Hold on. I wasn't there. 21 Yes. 22 Q Before we turn to the notes, you said you</p>

<p style="text-align: right;">253</p> <p>1 saw a bruise on Ms. Arm -- strike that. 2 You said you saw a bruise on Ms. Heard's 3 arm at some point when you were in Australia, 4 correct? 5 A Correct. 6 Q Do you have any understanding of how she 7 got that bruise? 8 A I do not. 9 Q Okay. Directing your attention to the 10 entry for March 7, 2015. Do you see here it says, 11 MD received a text message from client that he had 12 been arguing with his wife and that he had cut his 13 finger? 14 A Yes, I see that. 15 Q Okay. So this is the date that you went 16 and saw Mr. Depp after his injury, correct? 17 A Correct. 18 Q Now, if I could direct your attention down 19 to the portion that starts with 1530. 20 A Okay. 21 Q It says, MD cleaned and dressed wound to R 22 middle finger.</p>	<p style="text-align: right;">255</p> <p>1 Q Okay. So this is the same day that you 2 were notified that Mr. Depp had injured his 3 finger, correct? 4 A According to this, yes. 5 Q And this was also the same day that 6 Mr. Depp was seen in the ER for his finger, 7 correct? 8 A Correct. 9 Q Okay. In the middle of the page here do 10 you see -- in the middle of this entry do you see 11 where it says, Upon upon arrival back to apartment 12 patient discussed feeling of anger and sadness 13 about his relationship. Patient was encouraged to 14 stay away from wife as the relationship is toxic. 15 Patient expressed verbal understanding and why 16 they needed to separate? 17 Do you see that? 18 A I do. 19 Q Do you have any recollection of this 20 conversation beyond what's reflected in the notes? 21 A I do not. 22 Q Do you have any reason to doubt the</p>
<p style="text-align: right;">254</p> <p>1 Do you see that? 2 A I do. 3 Q What does "R middle finger" reflect? 4 A Right. 5 Q So Mr. Depp had cut his middle right 6 finger; is that correct? 7 A According to this, yes. 8 Q And do you know whether Mr. Depp is 9 right-handed? 10 A I don't recall. 11 Q Now, if I can direct your attention down 12 to the bottom part of this entry that starts with 13 1130. Do you see that? 14 A I do. 15 Q Now, this starts with, Patient and staff 16 returned from ER at 2130. 17 Do you see that? 18 A I do. 19 Q So am I -- am I -- is it correct that the 20 "1130" at the beginning of this is referring to 21 11:30 p.m.? 22 A Yeah, that would make sense. Yeah.</p>	<p style="text-align: right;">256</p> <p>1 accuracy of what you documented in your notes? 2 A I do not. 3 Q Do you recall advising Mr. Depp to stay 4 away from Ms. Heard? 5 A I don't recall anything other than what's 6 stated in my notes. 7 Q Okay. Do you recall ever having the view 8 that Mr. Depp and Ms. Heard's relationship was 9 toxic? 10 A Yes. 11 Q And what's the basis for that view? 12 A Conversations that he would share with me. 13 Q What did Mr. Depp share with you that -- 14 MR. NADELHAFT: Objection; hearsay. 15 THE WITNESS: I don't remember specifics. 16 Just, like, things we've reviewed in my notes, 17 that he would be emotional and that the 18 relationship was causing him stress. 19 Q After Mr. Depp injured his finger in 20 Australia, do you recall him coming back to LA? 21 MR. NADELHAFT: Objection; asked and 22 answered.</p>

257	<p>1 THE WITNESS: Yeah, I don't recall</p> <p>2 specifics, but I know we did return to LA at some</p> <p>3 point.</p> <p>4 Q Do you remember the status of Mr. Depp's</p> <p>5 finger injury when you were first back in LA?</p> <p>6 MR. NADELHAFT: Objection; vague.</p> <p>7 THE WITNESS: Yeah, I don't understand</p> <p>8 what you mean by "status."</p> <p>9 Q Was Mr. Depp's hand bandaged at all?</p> <p>10 A Yes.</p> <p>11 Q And why was that?</p> <p>12 A At one – I mean, beforehand we kept it</p> <p>13 bandaged to keep it clean, and then he had surgery</p> <p>14 and it was bandaged after the surgery.</p> <p>15 Q Do you recall that Mr. Depp had pins in</p> <p>16 his finger?</p> <p>17 A Yes.</p> <p>18 Q Do you recall Mr. Depp reporting that his</p> <p>19 finger was in pain?</p> <p>20 A Yes.</p> <p>21 MR. NADELHAFT: Objection; hearsay.</p> <p>22 Q How would he report his pain to you?</p>	259	<p>1 of the entry that starts with 0120?</p> <p>2 A Yes.</p> <p>3 Q Is this 1:20 in the morning; a.m.?</p> <p>4 A According to this, yes.</p> <p>5 Q Okay. Do you see it says, Patient states</p> <p>6 his wife is trying to argue with him?</p> <p>7 MR. NADELHAFT: Objection; hearsay.</p> <p>8 THE WITNESS: I see that.</p> <p>9 Q Okay. And, again, you have no reason to</p> <p>10 doubt the accuracy of your note?</p> <p>11 A Correct.</p> <p>12 Q Okay. Turning to the next page, do you</p> <p>13 see the portion of the note that starts with 0545?</p> <p>14 A Yes.</p> <p>15 Q And it says, Called to loft, correct?</p> <p>16 A Yes.</p> <p>17 Q What does that refer to?</p> <p>18 A I don't know specifically. Loft is where</p> <p>19 they were living.</p> <p>20 Q Is that the Eastern Columbia Building?</p> <p>21 A Correct.</p> <p>22 Q And then the next two sections of this</p>
258	<p>1 MR. NADELHAFT: Objection; hearsay.</p> <p>2 THE WITNESS: I'd have to read through my</p> <p>3 notes for specifics.</p> <p>4 Q Well, let's take a look at the entry in</p> <p>5 your notes for March 23, 2015, which is on page --</p> <p>6 it starts on page 1735 and goes on to 1736.</p> <p>7 A I see it.</p> <p>8 Q Okay. Actually, before we turn to that</p> <p>9 one, do you see in -- the entry above for 3/22/15?</p> <p>10 Do you see that entry?</p> <p>11 A I do.</p> <p>12 Q Okay. And do you see next to twenty- --</p> <p>13 the portion of the entry that starts with 2015, do</p> <p>14 you see in the middle it says, Currently 5/10?</p> <p>15 A Yes.</p> <p>16 Q Do you know what that refers to?</p> <p>17 A It's a pain scale.</p> <p>18 Q Okay. And is that how Mr. Depp would</p> <p>19 report his pain to you?</p> <p>20 A According to my notes.</p> <p>21 Q Okay. So now going to the entry for</p> <p>22 March 23rd. First of all, do you see the portion</p>	260	<p>1 note says, 0820 - torod, val, and then at 1445 the</p> <p>2 same thing.</p> <p>3 Do you see that?</p> <p>4 A Yes.</p> <p>5 Q What is that referring to?</p> <p>6 A Incomplete notes. It would have been</p> <p>7 Toradol and Valium administered.</p> <p>8 Q And do you have any recollection as to why</p> <p>9 those medications would have been administered?</p> <p>10 A They were for his pain.</p> <p>11 Q Okay. And then do you see below that it</p> <p>12 says, F/u Thursday afternoon and Tuesday</p> <p>13 afternoon. Skin graft bandage off week from</p> <p>14 Tuesday. Pin off in two weeks?</p> <p>15 A Yes.</p> <p>16 Q What does this reflect?</p> <p>17 A I don't recall.</p> <p>18 Q Did Mr. Depp have a skin graft on his</p> <p>19 finger?</p> <p>20 A He did.</p> <p>21 Q And I think you testified -- you just</p> <p>22 testified he had pins in his finger as well,</p>

<p style="text-align: right;">261</p> <p>1 right?</p> <p>2 A Correct.</p> <p>3 Q Sorry, I didn't hear that.</p> <p>4 A Correct.</p> <p>5 Q Okay. So at this time on March 23rd he</p> <p>6 had bandages and a skin graft and pins in his</p> <p>7 finger?</p> <p>8 A According to this, yes.</p> <p>9 Q And then do you see in the section that</p> <p>10 starts with twenty- -- 2000 - Patient informed</p> <p>11 wife is coming to talk to him and he became</p> <p>12 extremely anxious?</p> <p>13 Do you see that?</p> <p>14 A I do.</p> <p>15 Q Do you have any recollection of why</p> <p>16 Mr. Depp was anxious?</p> <p>17 A I do not.</p> <p>18 Q Do you remember being present for a fight</p> <p>19 with Mr. Depp -- between Mr. Depp and Ms. Heard</p> <p>20 shortly after Mr. Depp returned from Australia?</p> <p>21 A I don't remember specifics.</p> <p>22 Q Do you recall a fight when Amber's sister,</p>	<p style="text-align: right;">263</p> <p>1 A Yes.</p> <p>2 Q On how many occasions have you met</p> <p>3 Whitney?</p> <p>4 A I don't recall.</p> <p>5 Q And what is Whitney's relation to</p> <p>6 Ms. Heard?</p> <p>7 A Sister.</p> <p>8 Q Okay. So this first text message appears</p> <p>9 to be from Erin Boerum, and it says, Debbie</p> <p>10 just -- and it's on 14- -- it's at 1432, in</p> <p>11 military time, at -- on the date March 23, 2015.</p> <p>12 Do you see that?</p> <p>13 A Yes.</p> <p>14 Q Okay. And it says, Debbie just told me</p> <p>15 what is going on and to check with you. Is Amber</p> <p>16 awake or fall asleep?</p> <p>17 Do you see that?</p> <p>18 A I do.</p> <p>19 Q Do you recall reaching out to Erin Boerum</p> <p>20 on this date?</p> <p>21 A I do not.</p> <p>22 Q Okay. Directing your attention down to</p>
<p style="text-align: right;">262</p> <p>1 Whitney, was present?</p> <p>2 A I don't recall.</p> <p>3 MS. MEYERS: Can we please pull up</p> <p>4 Document H, please.</p> <p>5 (Lloyd 27, Text message chain between</p> <p>6 Whitney Heard and Boerum, Bates Nos. WH00106</p> <p>7 through WH00109, was marked for identification and</p> <p>8 is attached to the transcript.)</p> <p>9 AV TECHNICIAN: Exhibit 27.</p> <p>10 MS. MEYERS: Just for the record, this is</p> <p>11 a document that has the Bates No. WH 106 through</p> <p>12 109.</p> <p>13 Q And, Ms. Lloyd, you're not included on</p> <p>14 this, but I just want to direct your attention to</p> <p>15 the first text message here. This is -- I can</p> <p>16 represent to you these are text messages between</p> <p>17 Erin Boerum and Whitney Heard.</p> <p>18 A Okay.</p> <p>19 Q And before I proceed, do you know who</p> <p>20 Whitney Heard is?</p> <p>21 A Yes.</p> <p>22 Q Have you met her before?</p>	<p style="text-align: right;">264</p> <p>1 Whitney's -- to three messages down from</p> <p>2 Whitney -- or, excuse me, let's go up. Do you see</p> <p>3 that Whitney responds to Erin, She finally fell</p> <p>4 asleep?</p> <p>5 And then Erin says, Thank goodness. She</p> <p>6 must be exhausted. Do you want me to come to the</p> <p>7 loft? Or is she safe and sound asleep?</p> <p>8 Do you see that?</p> <p>9 A I do.</p> <p>10 Q And Whitney responds: Safe? No. She's</p> <p>11 not. Kept saying she wants to kill herself.</p> <p>12 Do you see that?</p> <p>13 A I do.</p> <p>14 Q Did you ever hear Ms. Heard saying she</p> <p>15 wanted to kill herself?</p> <p>16 MR. NADELHAFT: Objection; hearsay.</p> <p>17 THE WITNESS: No.</p> <p>18 Q Okay. Do these text messages combined</p> <p>19 with your notes refresh your recollection about an</p> <p>20 incident that occurred on March 23, 2015?</p> <p>21 A I remember an incident, but I don't</p> <p>22 remember the dates of it.</p>

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1 Q What incident are you remembering?
 2 A **There was an incident where Johnny and
 3 Amber got into a fight at the loft.**
 4 Q And what do you remember about that?
 5 A **I was staying next door at a hotel and
 6 security had come to get me saying that they had
 7 had an argument and Johnny wanted to go back to
 8 86. So --**
 9 Q Is that -- sorry. Is 86 the Sweetzer
 10 property?
 11 A **Yes.**
 12 Q Sorry. Continue.
 13 A **So I went -- I went to the Lofts. And I
 14 remember that night. Amber was already leaving.
 15 She was in the lobby when we walked through. And
 16 when she saw that I was coming, she came back up
 17 to the apartment.**
 18 Q And what happened when Ms. Heard came back
 19 up to the apartment?
 20 A **I don't remember specifically what
 21 happened. I remember Johnny was sitting outside
 22 and we went to leave and somehow we didn't end up**

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1 **leaving.**
 2 Q And why didn't you end up leaving?
 3 A **I don't remember.**
 4 Q Do you remember who else was in the
 5 apartment?
 6 A **I remember Travis, one of the security
 7 guards, was there.**
 8 Q Anyone else that you can remember?
 9 A **I don't remember exactly who else was
 10 there.**
 11 Q And is Travis, Travis McGivern?
 12 A **Correct.**
 13 Q Okay. Do you recall seeing Ms. Heard
 14 throw anything at Mr. Depp?
 15 A **I do not.**
 16 Q Do you remember Mr. Depp throwing anything
 17 at Ms. Heard?
 18 A **I don't recall.**
 19 Q Do you remember witnessing any physical
 20 violence on that occasion?
 21 A **I saw Johnny push over one of Amber's
 22 clothing racks.**

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1 Q Okay. No physical violence erupted at --
 2 A **No physical violence.**
 3 Q -- at a human, correct? Okay.
 4 And then do you -- you said you didn't end
 5 up leaving the apartment after that, correct?
 6 A **At some point that night we left.**
 7 Q And when you say "we," who does that
 8 include?
 9 A **Myself, Johnny, and Travis.**
 10 Q And where did you go?
 11 A **I don't remember.**
 12 Q Okay. Do you know where Amber went that
 13 night?
 14 A **I don't know.**
 15 Q Okay. But she didn't come with you?
 16 A **No.**
 17 MS. MEYERS: Can we please go back to the
 18 nursing notes which are Exhibit 23. And
 19 specifically could we go to the entry for
 20 March 25th that starts on DEPP 1736 and goes on to
 21 1737.
 22 Q Ms. Lloyd, do you see at the bottom here

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1 where it says 3/25?
 2 A **Yes.**
 3 Q And if we could just go to the next page.
 4 You'd agree that this is a continuation of that
 5 note, correct?
 6 A **Yes.**
 7 Q Okay. And do you see under 1330 it says,
 8 Patient states pain is 4/10?
 9 Do you see that?
 10 A **I do.**
 11 Q And what does that reflect?
 12 A **Pain was being rated at a 4 out of 10 out
 13 of 10 out of 10.**
 14 Q And then directing your attention down to
 15 the entry for March 26th. This is a note that you
 16 prepared, yes?
 17 A **Yes.**
 18 Q Okay. And just to make sure, I'm not sure
 19 I asked, but the prior two notes we looked at,
 20 those are also notes you prepared, right?
 21 A **Correct.**
 22 Q Okay. Now, if you could -- why don't you

<p style="text-align: right;">269</p> <p>1 take a moment and read through this note and just 2 let me know when you're done. 3 A Okay. 4 Q Now, the beginning of the note starts at 5 0145. Do you see that? 6 A I do. 7 Q And so, again, is that 1:45 in the 8 morning? 9 A Correct. 10 Q And it says here, RN called to patient's 11 home. Upon arrival patient and wife were fighting 12 in the garage. 13 Do you see that? 14 A I do. 15 Q Do you remember this incident? 16 A I do not. 17 Q Okay. It says, When argument became 18 heated patient removed himself from situation and 19 had security drive him to another home. 20 Do you see that? 21 A I do. 22 Q I think you just testified you don't</p>	<p style="text-align: right;">271</p> <p>1 Q What does this mean, plaintiff [sic] 2 continues to c/o pain 10/10? 3 A Complain of. 4 Q Okay. And the 10 out of 10 is the pain on 5 the scale that you referenced previously, correct? 6 A Correct. 7 Q Directing your attention down to the 8 portion that starts with 1615. It says, at follow 9 up with surgeon bandage was removed from skin 10 graft. Graft took 100% but there was an infection 11 under bolster. Finger was drained, pin was 12 removed and rocephin 1G was administered during 13 appointment. 14 Did I read that correctly? 15 A Yes. 16 Q Excuse me if my pronunciation is 17 incorrect. 18 What -- does this reflect that Mr. Depp 19 had the bandage from his skin graft on his right 20 middle finger removed on this date? 21 A Meaning removed at that time or removed 22 for good?</p>
<p style="text-align: right;">270</p> <p>1 remember witnessing this, correct? 2 A I do not. 3 Q You don't have any reason to doubt the 4 accuracy of what you wrote down in your note, 5 correct? 6 A I do not. 7 Q Had you seen Mr. Depp remove himself from 8 fights before in this manner? 9 A Yes. 10 MS. MEYERS: Could we please turn to the 11 entry for March 31st, which is on page DEPP 1740. 12 Q Okay. Ms. Lloyd, this is also a note that 13 you prepared? 14 A It is. 15 Q Okay. Do you see the portion that starts 16 0130, patient continues to c/o pain 10/10 which is 17 causing anxiety and insomnia? 18 Do you see that? 19 A Correct. Yes. 20 Q What does that reflect? 21 A I'm confused by the question. Just what 22 it -- what does what reflect?</p>	<p style="text-align: right;">272</p> <p>1 Q Removed at that time. 2 A At that time, that's what that would mean. 3 Q And the pin from his finger was also 4 removed? 5 A According to this. 6 Q Okay. And when you say the bandage was 7 removed at that time, are you clarifying that 8 because another bandage was put on? 9 A I don't remember, that's why I was 10 clarifying. 11 Q Okay. Do you remember what type of 12 bandages Mr. Depp had on his hand at this time? 13 A I didn't hear you. What type of bandage? 14 Q Yes. 15 A I don't remember specifics. 16 Q Was it a hard cast or a soft cast? 17 A Soft. 18 Q Was Mr. Depp's hand mobile -- I'm sorry. 19 A I don't recall if it was a cast, but I 20 know the bandage was soft. 21 Q Okay. Do you recall whether Mr. Depp 22 could move the hand that was bandaged?</p>

<p style="text-align: right;">273</p> <p>1 A Hand, yes. For a while he was -- his 2 finger was, like, splinted. 3 Q Okay. Could he grab anything with that 4 hand? 5 A I remember him pretending he had a claw. 6 He could do this. 7 Q Or were certain fingers bound together in 8 the cast? 9 A I don't remember specifics. 10 Q Okay. Mr. Depp eventually returned to 11 Australia after the time period we were just 12 discussing, correct? 13 A Correct. 14 Q And you returned with him? 15 A Correct. 16 Q And how long did you stay in Australia on 17 that trip? 18 A I don't recall. 19 Q I'd like to direct your attention to the 20 last page of this document which has -- if you 21 refer to July 1st. Do you see that? 22 A Yes.</p>	<p style="text-align: right;">275</p> <p>1 Q And who were they? 2 A Stephen and Nathan. 3 Q Do you recall both of them being in 4 Australia? 5 A I don't recall if they were both there. 6 Q Why did -- why did you understand -- 7 strike that. 8 Why did you understand that you were being 9 called to set? 10 MR. NADELHAFT: Objection; hearsay. 11 THE WITNESS: I don't recall at the time. 12 Q All right. Now, directing your attention 13 to the last part of this note where it says 2100. 14 It says here, Between shooting patient was able to 15 express his feeling to RN. He explained that his 16 wife makes him feel that he can never do anything 17 right and that they cannot have a conversation 18 without her blowing up. 19 Do you see that? 20 A I do. 21 MR. NADELHAFT: Objection; hearsay. 22 Q And I think you testified you don't recall</p>
<p style="text-align: right;">274</p> <p>1 Q Please take a moment and read through this 2 and just let me know when you're done. 3 A I'm done. 4 Q Okay, great. 5 This is a note you prepared, yes? 6 A Correct. 7 Q And do you remember the events reflected 8 in this note? 9 A I do not. 10 Q Directing your attention to the portion 11 that starts with 1235. Do you see where it says, 12 RN received text from patient's assistant that the 13 arguments between patient and wife are continuing 14 and RN should come to the set to see patient? 15 Did I read that correctly? 16 A Yes. 17 Q Sorry, I didn't hear your response. 18 A Yes. 19 Q Okay. Who was the assistant referred to 20 here, if you can recall? 21 A I don't recall. He had two main 22 assistants.</p>	<p style="text-align: right;">276</p> <p>1 having this exchange with Mr. Depp. 2 A Correct. 3 Q It goes on to say, Patient was given 4 positive reinforcement for expressing his 5 feelings. Patient verbalized he knows it's best 6 for them to "take a break" from each other when 7 the fights start to escalate but how she will 8 follow him from room to room when he tries to get 9 away. 10 Do you see that? 11 A I do. 12 MR. NADELHAFT: Objection; hearsay. 13 Q Have you ever personally observed Mr. Depp 14 try to get away from Ms. Heard and her then 15 following him? 16 MR. NADELHAFT: Objection; asked and 17 answered. 18 THE WITNESS: Yes. 19 Q But you don't recall him telling you in 20 this specific instance? 21 A I do not. 22 Q And, again, you don't have any reason to</p>

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277	<p>1 doubt the accuracy of this note?</p> <p>2 A I do not.</p> <p>3 Q Okay. This appears to be the last note</p> <p>4 reflected in this document. Do you see that?</p> <p>5 A I do.</p> <p>6 Q And I think you said you don't recall</p> <p>7 specifically when you stopped caring for Mr. Depp,</p> <p>8 correct?</p> <p>9 A Correct.</p> <p>10 Q Do you recall why you stopped providing</p> <p>11 nursing services to Mr. Depp?</p> <p>12 A I do not.</p> <p>13 Q Did you continue to work for Dr. Kipper</p> <p>14 after you stopped providing nursing services to</p> <p>15 Mr. Depp?</p> <p>16 A Yes.</p> <p>17 Q Now, I think you testified earlier you</p> <p>18 don't recall the last time you saw Mr. Depp.</p> <p>19 A Not for sure, no.</p> <p>20 Q What's the last time you remember seeing</p> <p>21 him?</p> <p>22 A I went to his -- one of his Hollywood</p>	279	<p>1 Erin Boerum about Mr. Depp?</p> <p>2 A I don't recall.</p> <p>3 Q After you stopped providing nursing care</p> <p>4 to Mr. Depp, did you ever speak to Erin Boerum</p> <p>5 about Ms. Heard?</p> <p>6 A I don't -- I don't recall.</p> <p>7 Q During the time you were Mr. Depp's nurse,</p> <p>8 did you ever see Mr. Depp physically abuse</p> <p>9 Ms. Heard?</p> <p>10 A No.</p> <p>11 MR. NADELHAFT: Objection; form,</p> <p>12 foundation.</p> <p>13 Q If you had witnessed this, would you have</p> <p>14 documented it in your nursing notes?</p> <p>15 MR. NADELHAFT: Objection; hypothetical.</p> <p>16 THE WITNESS: Yes.</p> <p>17 Q Did you ever see Mr. Depp throw anything</p> <p>18 at Ms. Heard?</p> <p>19 A I do not recall ever seeing him throw</p> <p>20 anything.</p> <p>21 Q Do you -- did you -- during the time you</p> <p>22 cared for Mr. Depp, did you ever see Ms. Heard</p>
278	<p>1 Vampires show out here in the desert.</p> <p>2 Q And relative to -- was this -- strike</p> <p>3 that.</p> <p>4 Was Mr. Depp and Ms. Heard still in a</p> <p>5 relationship when you saw Mr. Depp the last time?</p> <p>6 A No. Not that I was aware of.</p> <p>7 Q When was the last time you saw Ms. Heard?</p> <p>8 A I have no idea.</p> <p>9 Q What's the last time you remember seeing</p> <p>10 her?</p> <p>11 A I honestly don't know.</p> <p>12 Q After you stopped providing nursing care</p> <p>13 to Mr. Depp, did you ever speak with Dr. Kipper</p> <p>14 about Mr. Depp?</p> <p>15 A I don't recall specifically.</p> <p>16 Q Do you recall generally?</p> <p>17 A I do not.</p> <p>18 Q Okay. Did you ever speak to Dr. Kipper</p> <p>19 about Ms. Heard?</p> <p>20 A I don't recall.</p> <p>21 Q After you stopped caring -- providing</p> <p>22 nursing care to Mr. Depp, did you ever speak with</p>	280	<p>1 physically abuse Mr. Depp?</p> <p>2 A No.</p> <p>3 Q Did you ever see Ms. Heard throw anything</p> <p>4 at Mr. Depp?</p> <p>5 A I don't recall.</p> <p>6 Q In the time that you cared for Mr. Depp,</p> <p>7 did he ever tell you that Ms. Heard was physically</p> <p>8 abusive towards him?</p> <p>9 MR. NADELHAFT: Objection; hearsay.</p> <p>10 THE WITNESS: I don't recall any</p> <p>11 conversations like that.</p> <p>12 Q Were you ever concerned for Mr. Depp's</p> <p>13 safety around Ms. Heard?</p> <p>14 A No.</p> <p>15 Q Did Mr. Depp ever ask you to assist him in</p> <p>16 dealing with Ms. Heard?</p> <p>17 MR. NADELHAFT: Objection; hearsay, vague.</p> <p>18 THE WITNESS: Yeah, I don't understand the</p> <p>19 question.</p> <p>20 Q Were you ever called over by Mr. Depp when</p> <p>21 he was in a fight with Ms. Heard?</p> <p>22 MR. NADELHAFT: Objection; hearsay.</p>

<p style="text-align: right;">281</p> <p>1 THE WITNESS: I can't remember if it was 2 on a fight. I remember being called over after 3 fights. 4 Q And why -- to the extent you know, why 5 were you being called over? 6 MR. NADELHAFT: Objection to the extent it 7 calls for hearsay. 8 THE WITNESS: My role with Johnny was 9 medication and emotional support. 10 Q How many times did you travel with 11 Mr. Depp while he was under your care? 12 A Multiple, but I wouldn't -- I don't know a 13 specific number. 14 Q Did you ever witness Mr. Depp and 15 Ms. Heard get into arguments while you were 16 traveling? 17 A Yes. 18 Q And what would Mr. Depp do in those 19 circumstances? 20 MR. NADELHAFT: Objection; vague. 21 THE WITNESS: I -- I don't remember 22 specifics other than the one time I mentioned on</p>	<p style="text-align: right;">283</p> <p>1 THE WITNESS: I don't recall a 2 conversation. 3 MS. MEYERS: Could we pull up Exhibit I, 4 please. 5 AV TECHNICIAN: Please stand by. 6 MS. MEYERS: And just for the record, this 7 is the document bearing the Bates Nos. DEPP 7804 8 through 7848. 9 (Lloyd 28, Text Extraction Report between 10 Depp and Lloyd, Bates Nos. DEPP00007804 through 11 DEP00007848, was marked for identification and is 12 attached to the transcript.) 13 AV TECHNICIAN: Exhibit 28. 14 Q Ms. Lloyd, these are -- I'll represent 15 that these are text messages between you and 16 Mr. Depp. I think you've seen some of -- some 17 portions of this document when you were answering 18 Mr. Nadelhaft's questions. But I'd like to just 19 direct your attention specifically to messages 20 between you and Mr. Depp on May 27, 2015 which 21 appears on page 7841 and goes through to 7843. 22 AV TECHNICIAN: I'm sorry, Counsel, was</p>
<p style="text-align: right;">282</p> <p>1 the airplane. 2 Q Did Mr. Depp ever book a separate room to 3 separate himself from Ms. Heard? 4 A I don't recall. 5 Q Have you ever witnessed Ms. Heard lose her 6 temper? 7 A I don't recall specifics. 8 Q What do you recall generally? 9 A I can't recall. 10 Q In the time you treated Mr. Depp, did you 11 ever suspect he was under the influence of 12 alcohol? 13 A I don't recall a specific time span of 14 concern. 15 Q Do you recall any specific instances when 16 you were concerned that he was under the influence 17 of drugs that had not been prescribed by one of 18 his physicians? 19 A I don't recall. 20 Q Did Mr. Depp ever tell you that someone 21 had taken his prescription drugs? 22 MR. NADELHAFT: Objection; hearsay.</p>	<p style="text-align: right;">284</p> <p>1 there an instruction? 2 MS. MEYERS: Yes, I'm sorry. Can you 3 please go to the page 7841, and we're going to be 4 scrolling through the pages after that. It should 5 be -- I think it's up maybe two pages. Yup. 6 Great. 7 BY MS. MEYERS: 8 Q Ms. Lloyd, do you see the text message 9 that starts in the row that is up -- 10 MS. MEYERS: No. Can we go up another 11 page, please. 12 Okay, right here is perfect. Thank you. 13 Q Do you see the text message that starts in 14 row 320? 15 A Yes. 16 Q Okay. So I would like you to please read 17 through the text messages in rows 320 through 337 18 which are from May 27, 2015. 19 And before you begin, I just want to 20 confirm, this number under Participants next to 21 your name, that's your phone number? 22 A Oh, yeah. But I'm looking below and I was</p>

<p style="text-align: right;">285</p> <p>1 like, no. Above, yes.</p> <p>2 Q Okay. So if you could read through the</p> <p>3 text messages reflected in rows 320 through 337</p> <p>4 and then just let me know when you're done.</p> <p>5 A Okay, I'm done through 322.</p> <p>6 Okay, I'm done through 330.</p> <p>7 Q Are you done through 337?</p> <p>8 A I am, yeah.</p> <p>9 Q Do you recall this exchange with Mr. Depp?</p> <p>10 A I do not.</p> <p>11 Q Do you have an understanding of what you</p> <p>12 and Mr. Depp are discussing?</p> <p>13 MR. NADELHAFT: Objection; form,</p> <p>14 foundation.</p> <p>15 THE WITNESS: I mean, just from what the</p> <p>16 text messages says I can see what he was saying.</p> <p>17 Q And what was Mr. Depp saying?</p> <p>18 MR. NADELHAFT: Objection; hearsay.</p> <p>19 THE WITNESS: That his as-needed</p> <p>20 medications were missing.</p> <p>21 Q Anything else about how they came to be</p> <p>22 missing?</p>	<p style="text-align: right;">287</p> <p>1 MR. NADELHAFT: Objection; hearsay.</p> <p>2 THE WITNESS: I do not.</p> <p>3 Q Based on these text messages, fair to say</p> <p>4 that you replaced the medications that Mr. Depp</p> <p>5 had lost?</p> <p>6 MR. NADELHAFT: Objection; form,</p> <p>7 foundation, speculation.</p> <p>8 THE WITNESS: I don't recall anything</p> <p>9 other than what these text messages state.</p> <p>10 MS. MEYERS: I am going to take a break</p> <p>11 and just take a look over my notes and then,</p> <p>12 hopefully, I can come back and give you the good</p> <p>13 news that you're done.</p> <p>14 MR. NADELHAFT: Just a -- I would have a</p> <p>15 couple minutes, so don't -- I don't want you to</p> <p>16 get too happy.</p> <p>17 MS. HICKOX: Don't take it too seriously.</p> <p>18 THE VIDEOGRAPHER: The time is 7:04 p.m.</p> <p>19 We are going off the record.</p> <p>20 (Recess was held.)</p> <p>21 THE VIDEOGRAPHER: The time is 7:11 p.m.</p> <p>22 We're now back on the record.</p>
<p style="text-align: right;">286</p> <p>1 A I don't --</p> <p>2 MR. NADELHAFT: Objection; hearsay.</p> <p>3 THE WITNESS: I don't -- I already don't</p> <p>4 remember what the above text stated.</p> <p>5 Q Okay. Let's go to the text that's in row</p> <p>6 33, please -- 333, please.</p> <p>7 It says here, Saw them... She wiped me</p> <p>8 out of everything. Need Adderall in the PRNs...</p> <p>9 I don't like to be out of stuff on the just in</p> <p>10 case kinda deal... I can't believe she's got the</p> <p>11 balls to flat out steal my meds for her fucking</p> <p>12 debaucheries. Hard game... After all, she is the</p> <p>13 Sister. X. Me.</p> <p>14 Did I read that right?</p> <p>15 A You did.</p> <p>16 MR. NADELHAFT: Objection; hearsay.</p> <p>17 Q Do you have any understanding as to what</p> <p>18 Mr. Depp is referring to there?</p> <p>19 MR. NADELHAFT: Same objections.</p> <p>20 THE WITNESS: I do not.</p> <p>21 Q Do you know who he's referring to when he</p> <p>22 says, "she is the Sister"?</p>	<p style="text-align: right;">288</p> <p>1 BY MS. MEYERS:</p> <p>2 Q Ms. Lloyd, I'm sorry, but I do have just a</p> <p>3 couple more questions. I will try to be quick.</p> <p>4 When you started treating Mr. Depp, what</p> <p>5 was Ms. Heard's reaction to you?</p> <p>6 MR. NADELHAFT: Objection; vague, form,</p> <p>7 foundation, hearsay.</p> <p>8 THE WITNESS: I -- could you be more</p> <p>9 specific? I don't understand the question.</p> <p>10 Q Sure. How did Ms. Heard treat you when</p> <p>11 you first started caring for Mr. Depp?</p> <p>12 MR. NADELHAFT: Same objection.</p> <p>13 THE WITNESS: She was -- she was</p> <p>14 accepting.</p> <p>15 Q Did that ever change in the time you</p> <p>16 treated Mr. Depp?</p> <p>17 MR. NADELHAFT: Same objection.</p> <p>18 THE WITNESS: I felt it did.</p> <p>19 Q You felt it did?</p> <p>20 A (Nonverbal response.)</p> <p>21 Q And when was that?</p> <p>22 MS. HICKOX: Wait. Hold on. You have to</p>

289	<p>1 give an oral response. The court reporter can't 2 take nods of the head. 3 BY MS. MEYERS: 4 Q Sorry. You -- sorry. Let me -- okay. 5 You felt that at some time Ms. Heard's demeanor 6 towards you changed in the -- correct? 7 A Yes. 8 Q Okay. When -- when did you recall her 9 demeanor changing? 10 MR. NADELHAFT: Objection; form, 11 foundation, hearsay. 12 THE WITNESS: I don't recall specifically. 13 Q How did her -- how did her treatment of 14 you change? 15 MR. NADELHAFT: Same objections. 16 THE WITNESS: It wasn't so much her 17 treatment of me; of me hearing that she didn't 18 want me around from other members. 19 Q Who did you hear that from? 20 MR. NADELHAFT: Objection; hearsay. 21 THE WITNESS: I don't recall specific. It 22 was from other staff, people that we worked with.</p>	291	<p>1 that? 2 MR. NADELHAFT: Same objections. 3 THE WITNESS: No. 4 MS. MEYERS: All right. I have nothing 5 else. 6 Adam, I'll turn it over. 7 EXAMINATION 8 BY MR. NADELHAFT: 9 Q Ms. Lloyd, it should just be a few 10 minutes, hopefully. 11 Mr. Depp was your -- Mr. Depp was your 12 patient, correct? 13 A Correct. 14 Q And Amber Heard was not your patient; is 15 that right? 16 A Correct. 17 Q And you had no role in providing any 18 emotional support; is that right? 19 A Can you define "role." 20 Q You had testified before, I believe, that 21 you said one of your roles for Mr. Depp was 22 providing him emotional support. Did I recall</p>
290	<p>1 Q Did you understand -- do you have any 2 understanding as to why she didn't want you 3 around? 4 MR. NADELHAFT: Objection; hearsay. 5 THE WITNESS: I do not. 6 Q You don't. Okay. 7 Was Ms. Heard unfriendly towards you? 8 A No. 9 Q Did Ms. Heard ever get angry at you in 10 your presence? 11 A Not that I recall. 12 Q So just to be clear, your understanding 13 that Ms. Heard's feelings towards you changed is 14 based off of what you heard from other people, 15 correct? 16 MR. NADELHAFT: Objection; hearsay. 17 THE WITNESS: Yes. 18 Q And your understanding was that -- you 19 said she didn't want you around, correct? 20 MR. NADELHAFT: Objection; hearsay. 21 THE WITNESS: Yes. 22 Q Anything else that you can remember about</p>	292	<p>1 that correctly? 2 A Correct. 3 Q That -- you didn't have that role for 4 Amber Heard, correct? 5 A Correct. 6 Q Okay. One of the exhibits I saw, it was 7 exhibit that -- I believe Lloyd 22, there was a 8 reference to polysubstance abuse. What is that? 9 A Polysubstance abuse is used to determine 10 the use of different drugs and/or alcohol. 11 Q So it's abusing more than one drug or 12 alcohol; is that right? 13 A That's what it's -- the term means, yes. 14 MR. NADELHAFT: Could we go to Kipper 23 15 for -- 16 Q I just want to ask you a couple questions. 17 AV TECHNICIAN: Stand by. 18 MR. NADELHAFT: Thanks. 19 AV TECHNICIAN: Excuse me, Counsel. Did 20 you mean Lloyd 23? 21 MR. NADELHAFT: Yeah, Lloyd 23. 22 Apologize. And I believe it's page 80 of the PDF.</p>

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1 BY MR. NADELHAFT:
 2 Q So, Ms. Lloyd, it would be the March 7,
 3 2015 entries.
 4 **A March... Okay.**
 5 Q And you see the entry for 1300?
 6 **A Yes.**
 7 Q You wrote: Patient was having a hard time
 8 leaving the house so security suggested the MD and
 9 RN go to house to see patient. Upon arrival to
 10 the house patient was sitting in car ready to
 11 leave. MD assessed patient's finger and will
 12 spend more time with patient at the location he is
 13 being moved to.
 14 You wrote that?
 15 **A I did.**
 16 Q And that was based -- and you wrote that
 17 based off of information you were provided?
 18 **A I don't recall what that first sentence is**
 19 **regarding.**
 20 Q You don't have any reason to question the
 21 accuracy of the statement?
 22 **A I do not.**

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1 Q And then at 1130, the bottom entry, you
 2 had testified a bit to that. After the
 3 highlighted portion it says, MD offered patient
 4 Valium 10 milligrams IM to help with the anxiety
 5 and anger, but patient refused.
 6 You wrote that?
 7 **A I did.**
 8 Q Okay. And you have no reason to question
 9 the accuracy of that?
 10 **A I do not.**
 11 Q Okay. Was Mr. Depp expressing any -- do
 12 you recall Mr. Depp expressing any anger?
 13 **A Only what I see I referred to earlier in**
 14 **that note, the portion that was highlighted.**
 15 Q Okay. And then you -- then the
 16 highlighting goes -- going into the next page.
 17 Patient was talking about wanting to drink alcohol
 18 but did not obtain any.
 19 You wrote that?
 20 **A I did.**
 21 Q And that was based off of what you saw
 22 with Mr. Depp?

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1 **A According to this, yes.**
 2 Q Okay. And there's no reason to question
 3 the accuracy of that note?
 4 **A Correct.**
 5 Q And then 3/8/15, at 0145 you write:
 6 Patient has been on phone with his security guard
 7 that is staying with his wife at their rented
 8 house. Patient is discussing wanting to go home
 9 to LA tomorrow and rehashing night. Patient's
 10 personal security guard came to stay with patient.
 11 RN will be next door and instructed security to
 12 call during the night if needed.
 13 You wrote that?
 14 **A Correct.**
 15 Q Do you know what you meant by "patient is
 16 discussing wanting to go home to LA tomorrow and
 17 rehashing night"?
 18 **A I don't -- I do not recall what that's**
 19 **referring to.**
 20 Q Okay. And then there -- it -- there's
 21 just -- do your notes reflect the same, that
 22 there's kind of like a big space?

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1 **A Yes.**
 2 Q Yeah. Do you know what the reason is for
 3 that?
 4 **A I do not.**
 5 Q Okay.
 6 MR. NADELHAFT: Catherine, can you put up
 7 Attach- -- Attachment 22, the recording.
 8 Attachment 21, I apologize. Attachment 21.
 9 AV TECHNICIAN: Counsel, I apologize, but
 10 there is no Attachment 21, not in my downloads or
 11 the repository.
 12 MR. NADELHAFT: It must have not
 13 downloaded. Okay. It was too big. All right.
 14 That's fine.
 15 Let me just take a look through here.
 16 Q Oh. You said you saw a -- you said you
 17 saw a concert of Mr. Depp's sometime after he was
 18 your -- after you were no longer providing him
 19 services. Do you recall that?
 20 **A Yes.**
 21 Q Do you recall who you went to the concert
 22 with?

297	<p>1 A I went with friends.</p> <p>2 Q Okay. Any of the people we've been</p> <p>3 discussing, Ms. Boerum, or anybody else?</p> <p>4 A No. His security was there with them, but</p> <p>5 I went with friends.</p> <p>6 Q Okay. And I believe you testified way in</p> <p>7 the beginning that you are -- you go to Dr. Kipper</p> <p>8 as a patient; is that right?</p> <p>9 A Correct.</p> <p>10 Q Not going into any details, but how long</p> <p>11 have you been his patient?</p> <p>12 A Since before I went to nursing -- early</p> <p>13 2000s.</p> <p>14 Q Okay. And do you consider Dr. Kipper to</p> <p>15 be a friend?</p> <p>16 A Yes.</p> <p>17 Q Okay.</p> <p>18 MR. NADELHAFT: All right. Thank you. I</p> <p>19 have nothing further.</p> <p>20 MS. MEYERS: I have just a couple more</p> <p>21 questions. I apologize.</p> <p>22 EXAMINATION</p>	299	<p>1 This completes today's deposition.</p> <p>2 MR. NADELHAFT: Oh, wait. Real quick. I</p> <p>3 do think we want to make this deposition</p> <p>4 confidential. I don't know if we need to go back</p> <p>5 on the record to do that, but I do want to make</p> <p>6 the deposition transcript confidential.</p> <p>7 MS. MEYERS: Yeah.</p> <p>8 (Off the record at 7:23 p.m.)</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>
298	<p>1 BY MS. MEYERS:</p> <p>2 Q When you were with Mr. Depp in Australia,</p> <p>3 was he drinking at that time?</p> <p>4 A I don't recall him drinking.</p> <p>5 Q Do you recall that he was specifically</p> <p>6 abstaining from drinking during that time?</p> <p>7 A I don't recall.</p> <p>8 Q Did you ever see Ms. Heard drink in front</p> <p>9 of Mr. Depp while he was abstaining from alcohol?</p> <p>10 A Yes.</p> <p>11 Q Did you ever -- did he ever ask her not to</p> <p>12 do that, to your knowledge?</p> <p>13 A Not to my knowledge.</p> <p>14 Q Did you ever ask her not to do that?</p> <p>15 A Not to my knowledge.</p> <p>16 Q Okay.</p> <p>17 MS. MEYERS: I have nothing else.</p> <p>18 MR. NADELHAFT: I'm good now. Thank you,</p> <p>19 Ms. Lloyd.</p> <p>20 MS. MEYERS: Thank you so much.</p> <p>21 THE VIDEOGRAPHER: Please stand by. The</p> <p>22 time is 7:23 p.m. We're going off the record.</p>	300	<p>1 ACKNOWLEDGMENT OF DEPONENT</p> <p>2 I, DEBRA LLOYD, APRN, do hereby</p> <p>3 acknowledge that I have read and examined the</p> <p>4 foregoing testimony, and the same is a true,</p> <p>5 correct and complete transcription of the</p> <p>6 testimony given by me and any corrections appear</p> <p>7 on the attached Errata sheet signed by me.</p> <p>8</p> <p>9</p> <p>10 _____</p> <p>11 (DATE) (SIGNATURE)</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>

Conducted on March 8, 2022

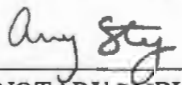
301

1 CERTIFICATE OF SHORTHAND REPORTER
2 NOTARY PUBLIC

3 I, AMY STRYKER, Certified Court Reporter
4 and Notary Public, the officer before whom the
5 foregoing deposition was taken, do hereby certify
6 that the foregoing transcript is a true and
7 correct record of the proceedings; that said
8 testimony was taken by me stenographically and
9 thereafter reduced to typewriting under my
10 supervision; that reading and signing was
11 requested; and that I am neither counsel for nor
12 related to, nor employed by any of the parties to
13 this case and have no interest, financial or
14 otherwise, in its outcome.

15 IN WITNESS WHEREOF, I have hereunto set my
16 hand and affixed my notarial seal this 9th day of
17 March, 2022.

18 My commission expires November 18, 2023.

19 
20 _____
21 NOTARY PUBLIC IN AND FOR
22 THE STATE OF MARYLAND