

Alan Blaustein
Proffer Exhibit U
Depp v. Heard
CL-2019-0002911

FILED

MAY 23 2022

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



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ORDER**

Transcript of Alan S. Blaustein, J.D., M.D.

Date: January 21, 2022
Case: Depp, II -v- Heard

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Conducted on January 21, 2022

<p>1 VIRGINIA: 2 IN THE CIRCUIT COURT FOR FAIRFAX COUNTY 3 ----- x 4 JOHN C. DEPP, II, : 5 Plaintiff, : Case No. 6 v. : CL-2019-0002911 7 AMBER LAURA HEARD, : 8 Defendant. : 9 ----- x 10 THIS TRANSCRIPT HAS BEEN MARKED CONFIDENTIAL 11 PURSUANT TO THE PROTECTIVE ORDER 12 ***** 13 Videotaped Deposition of 14 ALAN S. BLAUSTEIN, J.D., M.D. 15 Conducted Remotely via Zoom 16 Friday, January 21, 2022 17 12:34 Eastern Time 18 19 20 Job No.: 425547 21 Pages: 1 - 202 22 Reported By: AMY L. STRYKER, CCR</p>	<p>1 APPEARANCES 2 3 ON BEHALF OF PLAINTIFF JOHN C. DEPP: 4 ANDREW C. CRAWFORD, ESQ. 5 BENJAMIN G. CHEW, ESQ. 6 BROWN RUDNICK LLP 7 601 Thirteenth Street, NW 8 Suite 600 9 Washington, D.C. 20005 10 (202) 536-1785 11 and 12 LEO J. PRESIADO, ESQ. 13 BROWN RUDNICK LLP 14 2211 Michelson Drive 15 Irvine, California 92612 16 (949) 752-7100 17 18 19 20 21 22</p>
<p>1 Videotaped Deposition of ALAN S. 2 BLAUSTEIN, J.D., M.D., conducted 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 APPEARANCES CONTINUED 2 3 ON BEHALF OF DEFENDANT AMBER LAURA HEARD: 4 ADAM S. NADELHAFT, ESQ. 5 CLARISSA K. PINTADO, ESQ. 6 CHARLSON, BREDEHOFT, COHEN & BROWN 7 11260 Roger Bacon Drive 8 Suite 201 9 Reston, Virginia 20190 10 (703) 318-6800 11 12 ALSO PRESENT: 13 LUCIEN NEWELL, AV Technician 14 KIMBERLY JOHNSON, Videographer 15 16 17 18 19 20 21 22</p>

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1	P R O C E E D I N G S		
2	THE VIDEOGRAPHER: Here begins the video		
3	recorded deposition of Alan Blau- -- Blaustein		
4	taken in the matter of Depp versus Heard in the		
5	Circuit Court for Fairfax County, Virginia, Case		
6	No. CL-2019-0002911.		
7	Today's date is January 21, 2022. The		
8	time is 12:34 Eastern Time. This deposition is		
9	being held in different locations via Zoom.		
10	The court reporter is Amy Stryker, the		
11	video camera operator is Kim Johnson; both are on		
12	behalf of Planet Depos.		
13	Will counsel please introduce yourselves		
14	and state whom you represent.		
15	MR. NADELHAFT: Good morning. Adam		
16	Nadelhaft and Clarissa Pintado on behalf of Amber		
17	Laura Heard.		
18	MR. PRESIADO: Good morning. Leo Presiado		
19	for Mr. Depp.		
20	THE VIDEOGRAPHER: Anyone else?		
21	Okay. Will the court reporter swear --		
22	please swear in the witness.		
1	ALAN S. BLAUSTEIN, J.D., M.D.,		
2	after having been duly affirmed to tell		
3	the truth, testified as follows:		
4	EXAMINATION		
5	BY MR. NADELHAFT:		
6	Q Good morning. My name is Adam Nadelhaft.		
7	I'm here with Clarissa Pintado. We represent		
8	Amber Heard. We, along with Amber, thank you for		
9	your time today.		
10	Can you please provide your full name.		
11	A Alan Scott Blaustein.		
12	Q And what is your business address?		
13	A Well, it's just changing. It's 6330 San		
14	Vicente Boulevard, Suite 520, Los Angeles,		
15	California 90048.		
16	Q And your e-mail address is		
17	alan@blaustein.com?		
18	A Correct.		
19	Q I've also seen in some documents an e-mail		
20	address of docb- -- blau@gmail.com.		
21	A That's also --		
22	Q What is that?		
1	A That's also an e-mail address of mine.		
2	Q Okay. Have you ever been deposed before?		
3	A I have.		
4	Q Okay. So you probably know the rules of		
5	depositions. I'm going to be the one starting off		
6	asking you a series of questions. If, at any		
7	time, you do not understand my question, please		
8	let me know. Does that make sense?		
9	A Yes.		
10	Q If you cannot hear my question, please let		
11	me know. Does that make sense?		
12	A Yes.		
13	Q If you respond, it will be assumed that		
14	you heard the question and understood it. Does		
15	that make sense?		
16	A Yes.		
17	Q As you're doing, please be sure to answer		
18	verbally as opposed to a nod or a shake of the		
19	head so that the court reporter is able to		
20	accurately transcribe what you're saying. Okay?		
21	A Okay.		
22	Q Given that we're on Zoom and I'm not with		

9

1 you in the -- in your office, do you have any
 2 notes or documents with you or on your screen that
 3 you plan to refer to during this deposition?
 4 **A I have a -- the clinical file that you**
 5 **shared a copy of and in front of me, yes. And --**
 6 **that's all.**
 7 Q And --
 8 **A Actually, that's not all, no. I have a --**
 9 **a note to myself to ask about the things I already**
 10 **asked about: your names and a copy of the video**
 11 **for me.**
 12 Q Okay. And I'd ask that when we -- we're
 13 going to be putting documents in front of you
 14 electronically, which I believe should include
 15 what you're referring to as your -- your clinical
 16 file. So I'd ask that you look at the documents
 17 that are on the computer as opposed to the
 18 documents on the -- on the table. Does that make
 19 sense?
 20 **A It makes sense. It may be harder for me**
 21 **to read, but it makes sense.**
 22 Q Oh, okay. Let me ask you -- let me ask

10

1 you a question: Your clinical file, what does it
 2 consist of?
 3 **A Notes from different sessions that I had**
 4 **with Johnny when he was my patient.**
 5 Q Okay. And --
 6 **A It has -- has some billing records as**
 7 **well.**
 8 Q Okay. And I'd represent to you that we
 9 have -- I'll be showing it to you later, but we
 10 have about 11 pages of notes. Does that represent
 11 the amount of pages of notes you have with your
 12 sessions with Mr. Depp?
 13 **A I haven't counted them.**
 14 Q Okay. All right. Does -- does -- I
 15 assume if it was much more than 11 pages you would
 16 say, No, I have much more than that.
 17 **A I don't have much more than that.**
 18 Q Okay. And you may -- and it may be -- and
 19 we'll go through them, and if there's anything
 20 that you think is missing, please let me know.
 21 Okay?
 22 **A Uh-hum. Yes, I will.**

11

1 Q Okay. Did you review any documents in
 2 preparation for this deposition?
 3 **A I did.**
 4 Q What did you review?
 5 **A I looked at my notes last night.**
 6 Q Okay. Did you look at anything else?
 7 **A No.**
 8 Q Okay. Did anyone --
 9 MR. PRESIADO: Adam. Sorry -- sorry to
 10 interrupt. But before we get started I just
 11 wanted to -- because of the nature of this
 12 deposition I just want to make sure that it's
 13 marked confidential under the protective order.
 14 MR. NADELHAFT: Thank you.
 15 MR. PRESIADO: So I would request that the
 16 entirety of the deposition be marked as
 17 confidential.
 18 MR. NADELHAFT: Okay. Thank you.
 19 MR. PRESIADO: Sure.
 20 THE WITNESS: Yeah. In that vein, you
 21 know, it was represented to me by Clarissa that
 22 everything that we're doing today is covered by

12

1 the protective order, which includes, you know,
 2 what you just addressed. And I received last
 3 night a copy from you of a HIPAA release from
 4 Johnny authorizing me to talk about the things he
 5 talked about with me in session.
 6 Is that -- is that your understanding,
 7 Leo?
 8 MR. PRESIADO: Yes, that is.
 9 THE WITNESS: Okay.
 10 BY MR. NADELHAFT:
 11 Q Right. And Mr. Depp's counsel is here and
 12 he will, I'm sure, protect Mr. Depp's interests as
 13 he's done throughout all the depositions we've
 14 taken.
 15 **A All right.**
 16 MR. PRESIADO: That's correct.
 17 Q So, the -- other than the notes of your
 18 clinical sessions with Mr. Depp, did you review
 19 anything else in preparation for today's
 20 deposition?
 21 **A No.**
 22 Q Did you speak to anyone to prepare for

13

1 today's deposition?

2 **A I spoke to a lawyer friend of mine**

3 **about – about today's deposition, yes.**

4 Q What's the lawyer's name?

5 **A Mitch Macknin, M-A-C-K-N-I-N.**

6 Q And are you considering Mr. Macknin your

7 lawyer?

8 **A I was considering him as my lawyer. He's**

9 **an out-of-state attorney so he wouldn't be able to**

10 **represent me in this today.**

11 Q And --

12 **A But I consider my conversations with him**

13 **attorney-client privilege, nonetheless.**

14 Q Fair enough.

15 Did you talk to anyone else in preparation

16 for your deposition?

17 **A I mentioned to my wife I was having a**

18 **deposition today, but that was – that was it.**

19 Q Okay. And -- and no one else you spoke to

20 to prepare for your deposition, correct?

21 **A No, no.**

22 Q Have you ever spoken to Dr. Shannon Curry

14

1 about Mr. Depp?

2 **A I don't recognize that name; no.**

3 Q Have you ever spoken with Mr. Depp or

4 anyone on his behalf regarding this litigation?

5 **A I spoke with Mr. Depp at the time that you**

6 **requested my records for him and got his verbal**

7 **authorization at that time to release them.**

8 **I spoke to one of his attorneys back then**

9 **about getting the records that the – Carmen**

10 **Vasquez or Velasquez.**

11 MR. PRESIADO: Camille Vasquez?

12 THE WITNESS: That's it.

13 And, again, that was just about clearing

14 the confidentiality and -- and privilege issues

15 for releasing those records.

16 Q Do you recall --

17 **A But not since then, no.**

18 Q I'm sorry. Do you recall approximately

19 when you had the conversation with either -- with

20 Mr. Depp about releasing your records?

21 **A No. I was – it was some time ago. It**

22 **was around the time I released the records, before**

15

1 **that.**

2 Q Okay. Do you recall what year you

3 released the records to Mr. Depp's counsel?

4 **A Maybe two years ago, but I – I could look**

5 **at my records and find out for you, if you want.**

6 Q Sure.

7 **A That would be 2019.**

8 Q And when you spoke to Mr. Depp about

9 releasing the records, did you have any -- was

10 there any more substance of the conversation that

11 you recall?

12 **A He told me he was in France. He expressed**

13 **an interest in returning to therapy if/when he**

14 **came back to Los Angeles. It was a very short**

15 **conversation. That's all I remember.**

16 Q Has Mr. Depp returned to therapy with you?

17 **A No.**

18 Q When you spoke to Ms. Vasquez about

19 providing the records, do you recall any of the

20 substance of that conversation?

21 **A As I recall, it was only about getting a**

22 **release from him to release the records and some**

16

1 **details surrounding that. But nothing else that I**

2 **can recall.**

3 Q Have you had any written communications

4 with Mr. Depp or his counsel about the -- this

5 litigation other than providing them your records?

6 **A No.**

7 Q Have you spoken to anyone else about this

8 case or this litigation?

9 **A David Kipper spoke to me about -- about --**

10 **I think it was about the case or about being**

11 **deposed. I can't recall. But he mentioned that**

12 **he had been called or is being called and...**

13 Q Do you recall when that conversation was

14 with Dr. Kipper?

15 **A Three to six months ago.**

16 Q And do you recall any of the substance of

17 that conversation you had with Dr. Kipper?

18 **A No, I don't.**

19 Q Okay. Did you -- did you talk to

20 Dr. Kipper at all in this conversation three to

21 six months ago about any substantive issues

22 regarding Mr. Depp or Amber Heard?

17

1 **A I think -- I must have had -- well, I must**
 2 **have asked him if he had been in contact with**
 3 **Johnny in the last couple years. But I can't**
 4 **remember that I did or what the answer was.**
 5 Q And do you recall any -- do you recall
 6 anything at all you had -- anything at all about
 7 that conversation you had with Dr. Kipper?
 8 **A Well, as we're talking about it, it -- he**
 9 **talked about the idea of having representation for**
 10 **him at a deposition or trial testimony. I can't**
 11 **recall. The issues were about representation.**
 12 Q So when you spoke to Dr. Kipper, did you
 13 understand that Dr. Kipper had already been
 14 deposed?
 15 **A I'm confused now between being deposed and**
 16 **showing up for trial. So I can't say with**
 17 **certainty whether he had been depo- -- whether I**
 18 **knew whether he had been deposed at that time.**
 19 Q Okay. Do you recall at -- when you were
 20 talking to Dr. Kipper, whether he had already
 21 testified in some manner, whether it be at trial
 22 or a deposition?

18

1 **A I don't recall. Not with any certainty,**
 2 **no.**
 3 Q Do you recall any other sub- -- do you
 4 recall anything else you spoke about with
 5 Dr. Kipper during this call?
 6 Was it a call?
 7 **A I think it was a call, yes.**
 8 Q Do you recall anything else you discussed
 9 with Dr. Kipper during this call?
 10 **A Relevant to the -- relevant to this?**
 11 Q Relevant to Mr. Depp or Amber Heard.
 12 **A No, no.**
 13 Q Other than that conversation with
 14 Dr. Kipper, did you have any other conversations
 15 with Dr. Kipper regarding this litigation --
 16 regarding this litigation?
 17 **A No.**
 18 Q When did you stop treating -- when did you
 19 stop treating Mr. Depp?
 20 MR. PRESIADO: Objection; assumes facts
 21 not in evidence, lacks foundation.
 22 Q And you can answer the question. There's

19

1 going to be objections that come from time to
 2 time.
 3 **A Sure.**
 4 Q And unless someone instructs you not to,
 5 you can answer the question.
 6 **A Okay. It was about seven years ago. It**
 7 **would be reflected in my records.**
 8 Q Okay. After you stopped treating
 9 Mr. Depp, did you have any further conversations
 10 with Dr. Kipper about Mr. Depp that you recall?
 11 **A I did, yes.**
 12 Q Do you recall how many conversations you
 13 had?
 14 **A One or two.**
 15 Q What were the substance of those one or
 16 two conversations?
 17 **A Well, the substance of it was one was**
 18 **about him -- I think he went to his wedding. It**
 19 **was about being at his wedding. And the other one**
 20 **was me asking about how he was doing clinically.**
 21 Q What did Dr. Kipper tell you about
 22 Mr. Depp's wedding?

20

1 **A I remember aspects of it because it was**
 2 **a -- it sounded so magnificent. It was on a**
 3 **private island, I think, with a -- I may be**
 4 **crossing wires on these recollections. But very**
 5 **beautiful, a beautiful place, really well done.**
 6 **Sounded magnificent.**
 7 MR. PRESIADO: Adam, if I can insert an
 8 objection to that last question. It calls for
 9 hearsay. Go ahead.
 10 MR. NADELHAFT: Okay.
 11 Q Is there anything else you recall about
 12 the -- about Mr. Depp's wedding that you spoke
 13 about with Dr. Kipper?
 14 MR. PRESIADO: Same objection.
 15 THE WITNESS: No.
 16 Q And -- and when you talk about the
 17 wedding, it's -- Mr. Depp was marrying Amber
 18 Heard, correct?
 19 **A I assume so, yes.**
 20 Q That was the wedding you assume Dr. Kipper
 21 went to, right?
 22 **A Correct, correct.**

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<p>1 Q And then you said you had another 2 conversation with Dr. Kipper about Mr. Depp's 3 treatment? 4 A It may have been -- it may have been the 5 same conversation. And it -- you know, Doc-- 6 yes, yes. 7 Q And what do you recall discussing with 8 Dr. Kipper about Mr. Depp's treatment? 9 MR. PRESIADO: Objection; calls for 10 hearsay. 11 THE WITNESS: I -- I remember asking him 12 how he -- how he was doing. And I actually can't 13 remember what his answer was. 14 Q Okay. Do you recall anything else about 15 that conversation with Dr. Kipper? 16 MR. PRESIADO: Same objection. 17 THE WITNESS: No. 18 Q Okay. Did you have conver- -- did you -- 19 have you spoken with anyone else other than 20 Dr. Kipper about this litigation? 21 A No. Well, and the lawyer that I told you 22 about.</p>	21	<p>1 A That was a personal injury suit. 2 Q Okay. And when you've been deposed in 3 your -- when you've been deposed, were you 4 testifying as a fact witness or as an expert 5 witness? 6 MR. PRESIADO: Objection; vague and 7 ambiguous as to time. 8 THE WITNESS: I'm sorry, I didn't hear 9 what you said, Leo. 10 MR. PRESIADO: I said, vague and ambiguous 11 as to time. I'm -- it's unclear what -- 12 Q Have you ever been deposed as an expert 13 witness? 14 A Yes. 15 Q Okay. And you're counting those times as 16 an expert witness in the -- in the four to six 17 times you've been deposed? 18 A Yes. 19 Q How many times were you deposed as an 20 expert witness? 21 A Four to six times. 22 Q Okay. So -- okay. So is this the first</p>	23
<p>1 Q Sure. 2 You said you've been deposed before? 3 A Yes. 4 Q How many times have you been deposed? 5 A Five or six -- four, five, six, something 6 like that. 7 Q And have they all been regarding your work 8 as a psychiatrist? 9 A There was -- there was litigation in 1978 10 that I was up -- I'm not sure if I -- no, I wasn't 11 deposed in that, no. They were all related to my 12 work as a psychiatrist, yes. 13 Q Have you ever given trial testimony? 14 A No. Oh. No, I've never given trial 15 testimony as a psychiatrist. 16 Q Okay. Was the testimony you were thinking 17 about from 1978 the testimony -- 18 A '79, yeah. 19 Q '79? 20 A Yeah. 21 Q Okay. And what -- in general, what was 22 that about?</p>	22	<p>1 time you're being deposed as a fact witness? 2 A As a psychiatrist as a fact witness, I'll 3 have to say half an answer to that. There was a 4 deposition that was split between me being a fact 5 witness and me being an expert. But, otherwise, 6 this would be the first full time as a fact 7 witness. 8 Q When you were being deposed as an expert 9 witness, what was your -- what -- what was your 10 field of expertise that you were opining on? 11 A Psychiatry. 12 MR. PRESIADO: Objection; compound, vague 13 and ambiguous. 14 Q Were you -- was there any particular 15 topics that you were asked to opine on as an 16 expert when you were being deposed? 17 MR. PRESIADO: Objection; vague and 18 ambiguous as to time. 19 THE WITNESS: Yes. 20 Q What were the -- what were the -- what 21 were you considered an expert in? 22 MR. PRESIADO: Objection; vague and</p>	24

25

1 ambiguous as to time.
 2 THE WITNESS: Psychiatry.
 3 BY MR. NADELHAFT:
 4 Q And then what part -- what part -- what
 5 portion or what opinions were you giving as an
 6 expert?
 7 MR. PRESIADO: Objection; vague and
 8 ambiguous as to time.
 9 THE WITNESS: Diagnosis, level of
 10 impairment, disability, causation.
 11 Q When was the last time you were deposed as
 12 an expert?
 13 A A long time ago. That would be at least
 14 10 or 15 years ago.
 15 Q And, you know, without providing details
 16 of the particular case, can you give in general
 17 what the opinion you were providing was?
 18 A I can't recall.
 19 Q Have you ever been deposed in any cases
 20 involving Mr. Depp?
 21 A No.
 22 Q Have you ever been deposed in any cases

26

1 involving Amber Heard?
 2 A No.
 3 Q We've already sort of -- we've gotten
 4 here, but you're a doctor, correct?
 5 A Correct.
 6 Q And you're a psychiatrist?
 7 A Yes.
 8 Q How long have you been a psychiatrist?
 9 A Well, now I'm going to object, because now
 10 this gets into an area where it doesn't have me as
 11 a fact witness. I don't understand, since I'm not
 12 here as an expert, what the relevance is of how
 13 long I've been a psychiatrist. I'm here as -- I'm
 14 here to testify as to what I -- as your associate
 15 said, what I heard, what I observed, what I said.
 16 And what the level of my education is or my
 17 expertise, I don't -- I don't think it's relevant
 18 to me being a percipient witness here.
 19 Q Respectfully, Doctor -- respectfully,
 20 Doctor, I mean, these are background questions.
 21 Every witness gets asked these types of questions.
 22 So I -- and you can't not answer a question

27

1 because of relevance unless it's way out of
 2 bounds. And I think it is relevant how long
 3 you've been a psychiatrist for.
 4 A Can you explain that to me what the
 5 relevance is to my observations of Mr. Depp in my
 6 sessions with him? I -- again, I'm here as a fact
 7 witness. So it may be relevant since it's not an
 8 appropriate objection, but it may be an
 9 inappropriate question. If you can explain the
 10 relevance to me, I'm happy to answer.
 11 Otherwise --
 12 Q Because the -- because the jury needs to
 13 know who you are as a -- as a -- as a doctor and
 14 as a witness, and --
 15 A As a witness, I understand. But as a
 16 doctor, why do they need to know that?
 17 Q Again, really, this isn't your -- it
 18 really isn't --
 19 A I don't have a -- with respect, I
 20 didn't --
 21 Q I don't want to fight with you, Doctor,
 22 but this is -- these questions are asked of a

28

1 hundred percent of the people who are ever a
 2 witness -- who are ever a witness what their
 3 background is. So I'm -- yeah.
 4 A All right. Well --
 5 Q It's a fair question.
 6 A I'll go a little bit farther with this,
 7 and so I will answer that question. But there
 8 will be a place that I'll set a limit and then
 9 we'll need to get a judge's order for me to answer
 10 those question as a percipient witness. So, fine.
 11 Please repeat the question.
 12 Q How long have you been a psychiatrist for?
 13 A Since 1987.
 14 Q And you went to medical school?
 15 A Yes.
 16 Q What medical school did you go to?
 17 A Northwestern University.
 18 Q Do you also have a law degree?
 19 A Yes.
 20 Q Where did you go to law school?
 21 A University of Illinois.
 22 Q And when did you graduate from law school?

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29	<p>1 A 1978.</p> <p>2 Q Did you start practicing psychiatry in</p> <p>3 1987?</p> <p>4 A Yes.</p> <p>5 Q And where did you start practicing, what</p> <p>6 city?</p> <p>7 A Los Angeles.</p> <p>8 Q And have you been practicing in Los</p> <p>9 Angeles since 1987 as a psychiatrist?</p> <p>10 A Yes.</p> <p>11 Q And can you briefly explain the difference</p> <p>12 between a psychiatrist and a psychologist.</p> <p>13 A No, that, I won't do. That requires my</p> <p>14 expert thought. No.</p> <p>15 Q Okay. So you're not answering the</p> <p>16 question?</p> <p>17 A Correct.</p> <p>18 Q Can you prescribe medications?</p> <p>19 A Yes.</p> <p>20 Q Do you practice psychotherapy?</p> <p>21 A Yes.</p> <p>22 Q What is psychotherapy?</p>	31	<p>1 A Because of that, I won't define things</p> <p>2 that might require expert opinion --</p> <p>3 Q Okay. So you -- okay.</p> <p>4 A -- based on my education.</p> <p>5 Q Okay. Just so I'm clear, you're refusing</p> <p>6 to answer what psychotherapy is. I just want to</p> <p>7 make sure I'm understanding.</p> <p>8 A Yes, I'm refusing to give my expert</p> <p>9 opinion as to what psychotherapy is, yes.</p> <p>10 Q Okay. And you think it -- you think that</p> <p>11 providing an answer as to what psychotherapy is</p> <p>12 would be an expert opinion as opposed to a fact</p> <p>13 question?</p> <p>14 A Yes.</p> <p>15 Q Okay. You've mentioned Dr. Kipper before,</p> <p>16 correct?</p> <p>17 A Yes.</p> <p>18 Q How long have you known Dr. Kipper?</p> <p>19 A Since the late '80s.</p> <p>20 Q How did you come to meet Dr. Kipper?</p> <p>21 A He was a friend of a colleague friend of</p> <p>22 mine who introduced us.</p>
30	<p>1 A I gotta -- that's going to be another</p> <p>2 question I'm not asking -- I'm not answering.</p> <p>3 Q That -- so that's so I can understand when</p> <p>4 you're talking about your work with Mr. Depp, what</p> <p>5 you're doing. I think that's perfectly good --</p> <p>6 A Well, I'm not talking about my work with</p> <p>7 Mr. Depp. I'm talking about what I heard and what</p> <p>8 I said. I'm not talking about my work. That's --</p> <p>9 that goes to the critical issue here. You've</p> <p>10 called me as a percipient witness and you're</p> <p>11 asking me questions that require me being a</p> <p>12 psychiatrist in order to answer. And -- and I</p> <p>13 don't think that's appropriate.</p> <p>14 And, again, I -- you know, it's not to be</p> <p>15 obstinate, but you have a particular way that</p> <p>16 you've called me, and I have a particular way that</p> <p>17 I am. And I'm -- you know, there is a bunch of</p> <p>18 professionals in this Zoom room right now. I'm</p> <p>19 the only one not being paid because I'm a fact</p> <p>20 witness, not because I'm a professional.</p> <p>21 Q And because of that, you won't answer what</p> <p>22 psychotherapy is?</p>	32	<p>1 Q Who is that friend?</p> <p>2 A Barry Stone.</p> <p>3 Q Do you consider Dr. Kipper a friend?</p> <p>4 A Yes.</p> <p>5 Q What type of doctor is Dr. Kipper?</p> <p>6 A He's an internist.</p> <p>7 Q Does Dr. Kipper refer patients to you?</p> <p>8 A Yes.</p> <p>9 Q Do you refer patients to Dr. Kipper?</p> <p>10 A Yes.</p> <p>11 Q Now, Johnny Depp was a patient of yours,</p> <p>12 correct?</p> <p>13 A Correct.</p> <p>14 Q And Mr. Depp was referred to you by</p> <p>15 Dr. Kipper?</p> <p>16 A Yes.</p> <p>17 Q Did you know Mr. Depp personally before he</p> <p>18 was referred to you by Dr. Kipper?</p> <p>19 A No.</p> <p>20 Q Have you ever -- did you ever treat</p> <p>21 Mr. Depp before Dr. Kipper referred him to you?</p> <p>22 A No.</p>

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<p>1 Q To your knowledge, was Mr. Depp a patient 2 of Dr. Kipper's before he was referred to you? 3 A Yes, he was. 4 Q What's your understanding as to why 5 Mr. Depp was a patient of Dr. Kipper? 6 MR. PRESIADO: Objection; vague and 7 ambiguous, calls for speculation, lacks 8 foundation. 9 Q You can answer the question. 10 A I -- yeah, I don't know how he initially 11 became a patient, but initially got introduced to 12 me as a substance dependency issue and a desire 13 for psychotherapy. 14 Q I think you broke up just a little bit. 15 Did you -- can you repeat that answer. 16 A Sure. There was a -- the issue got 17 referred to me as an issue of substance dependence 18 as well as a desire for psychotherapy. 19 Q Do you know who Amber Heard is? 20 A By name. I know that was his fiancée at 21 the time that I was seeing him. 22 Q I assume from that answer, Amber Heard was</p>	33	<p>1 Q When Mr. Depp was referred to you by 2 Dr. Kipper, was it your understanding that he was 3 in a relationship, Mr. Depp, with Amber? 4 A That was years ago. At some point I 5 became aware that he was in a relationship with 6 Amber, but I don't know if that was part of the 7 initial presentation. 8 Q Did you -- did you ever -- did you ever 9 ask for Dr. Kipper's records of Mr. Depp when you 10 were treating Mr. Depp? 11 A No. The only thing I asked him for was a 12 list of medications that Mr. Depp was taking. 13 Q Did -- you spoke before that you 14 understood that you were going to be -- well, you 15 understood that Mr. Depp had substance dependence 16 issues; is that correct? 17 A Yes. 18 Q Do you recall what substance issues -- 19 what substances he had -- Mr. Depp had issues 20 with? 21 A Marijuana, alcohol, opiates, I believe. 22 Q What about cocaine?</p>	35
<p>1 not a patient of yours, correct? 2 A Correct. 3 Q Do you know if Amber Heard went to any 4 therapy while you were seeing Mr. Depp? 5 A I can't remember if they had couples 6 therapy together. But I don't know. 7 Q Do you know Dr. Connell Cowan? 8 A Say the name again. 9 Q Dr. Cowan, C-O-W-A-N. 10 A I know him. I met him. I'm not friendly 11 with him and haven't worked with him. 12 Q So do you know one way or the other if 13 Amber saw Dr. Cowan? 14 A I do not know. 15 Q And so I assume you never spoke to 16 Dr. Cowan about Amber or Mr. Depp, correct? 17 A Correct. 18 Q Did you ever meet Amber Heard? 19 A No. 20 Q Do you know if Amber was a patient of 21 Dr. Kipper's? 22 A I don't know.</p>	34	<p>1 A I don't recall. 2 Q Do you know if Mr. Depp had -- had any 3 substance issues with -- with benzos? 4 A I don't recall. 5 Q Do you recall having any conversations 6 with Dr. Kipper about Mr. Depp's substance abuse 7 issues before you met with Mr. Depp? 8 A I don't recall any specific conversation, 9 no. 10 Q Do you recall if Mr. Depp had any issues 11 with insomnia? 12 A Yes, he did. 13 Q How did you come to the understanding that 14 Mr. Depp had issues with insomnia? 15 A As I recall, he talked about how difficult 16 it was to go to sleep, stay asleep. 17 Q Did you understand that Mr. Depp was 18 taking Roxicodone for his insomnia? 19 A I don't recall that. 20 Q Roxicodone is a narcotic pain reliever, 21 right? 22 A Say the name of the drug again.</p>	36

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<p>37</p> <p>1 Q Roxicodone, R-O-X-I-C-O-D-O-N-E.</p> <p>2 A I'm not familiar with that drug.</p> <p>3 Q Did Dr. Kipper tell you that Mr. Depp was</p> <p>4 diagnosed with ADHD?</p> <p>5 A I don't recall.</p> <p>6 Q Do you recall if Mr. Depp -- do you recall</p> <p>7 knowing one way or the other if Mr. Depp was</p> <p>8 diagnosed with ADHD?</p> <p>9 A I remember there was some discussion about</p> <p>10 it, but I can't recall whether it was a diagnosis</p> <p>11 or not.</p> <p>12 Q Do you remember -- was a conversation --</p> <p>13 who was the conversation with about ADHD for</p> <p>14 Mr. Depp?</p> <p>15 A I imagine it was a -- with Mr. Depp, but,</p> <p>16 again, I don't have a specific recollection of</p> <p>17 that.</p> <p>18 Q Did you understand that Mr. Depp was</p> <p>19 taking Adderall?</p> <p>20 A I do remember from looking at my notes</p> <p>21 last night that he was taking Adderall, but I</p> <p>22 don't have a specific recollection from the time.</p> <p>38</p> <p>1 Q Okay. And Adderall can have side effects</p> <p>2 of hallucinations, right?</p> <p>3 A Again, I think that requires an expert</p> <p>4 opinion that I'm unwilling to testify to.</p> <p>5 Q Okay. Did you ever have an understanding</p> <p>6 that Mr. Depp had anxiety syndrome?</p> <p>7 A I knew Mr. Depp had anxiety.</p> <p>8 Q And how did you come to be aware that</p> <p>9 Mr. Depp had anxiety?</p> <p>10 A He told me that.</p> <p>11 Q Did you understand that Mr. Depp was</p> <p>12 taking Klonopin for his anxiety?</p> <p>13 A I don't recall.</p> <p>14 Q Did -- did you have any discussions with</p> <p>15 any -- with Dr. Kipper about any impressions or</p> <p>16 diagnosis he had of Mr. Depp?</p> <p>17 MR. PRESIADO: Objection; compound, vague</p> <p>18 and ambiguous.</p> <p>19 THE WITNESS: I'm sure Dr. Kipper and I</p> <p>20 had a few conversations during the course of my</p> <p>21 treatment about issues, clinical issues, relating</p> <p>22 to Mr. Depp.</p>	<p>39</p> <p>1 Q What do you recall about those</p> <p>2 conversations of the clinical issues related to</p> <p>3 Mr. Depp?</p> <p>4 MR. PRESIADO: Objection to the extent it</p> <p>5 calls for hearsay.</p> <p>6 THE WITNESS: I don't have specific</p> <p>7 recollections of the calls.</p> <p>8 Q Do you have any general recollections?</p> <p>9 MR. PRESIADO: Same objection.</p> <p>10 THE WITNESS: I can only presume the kinds</p> <p>11 of things we would have talked about, but I don't</p> <p>12 have a recollection about any specifics.</p> <p>13 Q Do you recall ever hearing that Mr. Depp</p> <p>14 had primary dopamine imbalance?</p> <p>15 MR. PRESIADO: Objection; vague and</p> <p>16 ambiguous, calls for speculation based on his</p> <p>17 previous testimony.</p> <p>18 THE WITNESS: I don't recall.</p> <p>19 Q Do you recall having any conversations</p> <p>20 that Mr. Depp was bipolar?</p> <p>21 MR. PRESIADO: Same objections.</p> <p>22 THE WITNESS: There was some question</p> <p>40</p> <p>1 about bipolar disorder diagnosis, but I do not</p> <p>2 remember any specifics about the discussion.</p> <p>3 BY MR. NADELHAFT:</p> <p>4 Q And would that -- would the discussion of</p> <p>5 bipolar diagnosis be with Dr. Kipper?</p> <p>6 MR. PRESIADO: Objection; calls for</p> <p>7 hearsay.</p> <p>8 THE WITNESS: I don't recall discussing it</p> <p>9 with Dr. Kipper. It's possible.</p> <p>10 Q Would you -- could you have had the</p> <p>11 discussion with somebody else?</p> <p>12 A With Mr. Depp.</p> <p>13 Q Do you recall having a conversation with</p> <p>14 Mr. Depp about a bipolar diagnosis?</p> <p>15 A No.</p> <p>16 Q Is there anyone else you could have had</p> <p>17 the conversation with about a bipolar diagnosis</p> <p>18 other than Dr. Kipper or Mr. Depp?</p> <p>19 A The only other person I spoke to about</p> <p>20 Mr. Depp was a nurse that was accompanying him</p> <p>21 during his treatment. I cannot remember her name</p> <p>22 at this time, but -- I can't imagine I would be</p>
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1 **discussing that with her, but -- but it was**
 2 **another person who --**
 3 Q Was Deb- -- sorry. Was Debbie Lloyd the
 4 nurse?
 5 **A I think that's right.**
 6 Q Were you aware of any -- were you aware
 7 that Dr. Kipper was conducting drug testing of
 8 Mr. Depp?
 9 **A I don't recall.**
 10 Q Were you ever informed of the results of
 11 any -- any drug tests that Mr. Depp took?
 12 MR. PRESIADO: Objection; calls for
 13 speculation.
 14 THE WITNESS: I don't recall. I don't
 15 recall.
 16 Q When Dr. Kipper referred Mr. Depp to you,
 17 did you understand that Mr. Depp was going to
 18 Dr. Kipper for a detox from drugs and alcohol?
 19 **A I know he was being treated, amongst other**
 20 **things, I suppose, for drugs and alcohol.**
 21 Q In working with Mr. Depp, did you
 22 understand that Mr. Depp had a history of abusing

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1 ecstasy, or MDMA?
 2 MR. PRESIADO: Objection; assumes facts
 3 not in evidence, calls for speculation, lacks
 4 foundation.
 5 THE WITNESS: I don't recall.
 6 Q In working with Mr. Depp did you
 7 understand that Mr. Depp had a history of abusing
 8 mushrooms?
 9 MR. PRESIADO: Objection; assumes facts
 10 not in evidence, lacks foundation, calls for
 11 speculation.
 12 THE WITNESS: I don't recall.
 13 Q In working with Mr. Depp did you
 14 understand that Mr. Depp had a history of abusing
 15 cannabis?
 16 **A Yes.**
 17 Q Okay. In working with Mr. Depp did you
 18 understand that Mr. Depp had a history of abusing
 19 oxycodone?
 20 MR. PRESIADO: Objection; calls for
 21 speculation, lacks foundation, assumes facts not
 22 in evidence.

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1 THE WITNESS: Could you repeat the name of
 2 that medication again, please.
 3 BY MR. NADELHAFT:
 4 Q Oxycodone.
 5 **A Yes.**
 6 Q You understood that Mr. Depp had a history
 7 of abusing oxycodone, correct?
 8 **A Yes.**
 9 Q In working with Mr. Depp did you
 10 understand that Mr. Depp had a history of abusing
 11 Xanax?
 12 MR. PRESIADO: Objection; calls for
 13 speculation, lacks foundation, assumes facts not
 14 in evidence.
 15 THE WITNESS: I don't recall.
 16 Q In working with Mr. Depp did you
 17 understand that Mr. Depp had a history of abusing
 18 Adderall?
 19 MR. PRESIADO: Assumes facts not in
 20 evidence, lacks foundation, calls for speculation.
 21 Q You can answer.
 22 **A I don't know that it was characterized as**

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1 **abuse, but I do know that he had a history of**
 2 **using Adderall.**
 3 Q Did you ever have an understanding that
 4 Mr. Depp was on an island attempting to detox from
 5 drugs and alcohol in around August of 2014?
 6 **A I don't recall.**
 7 Q Do you recall whatever -- forgetting what
 8 year it was, that there would -- that Mr. Depp was
 9 on an isl- -- was on an island trying to detox
 10 from drugs and alcohol?
 11 **A I don't recall that, no.**
 12 Q Do you recall ever speaking with
 13 Dr. Kipper or Mr. Depp about Dr. Kipper being on
 14 an island with Mr. Depp trying to detox Mr. Depp
 15 from drugs and/or alcohol?
 16 **A Not that I recall.**
 17 MR. NADELHAFT: Could we put up what's
 18 attachment 3.
 19 AV TECHNICIAN: Stand by.
 20 Would you like to mark it as --
 21 MR. NADELHAFT: You can mark it as
 22 Blaustein Exhibit 1, yeah.

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1 (Exhibit 1, E-mail from Dr. Kipper dated
 2 8/18/14, was marked for identification and is
 3 attached to the transcript.)
 4 AV TECHNICIAN: Got it. I'm showing
 5 Exhibit 1 on the screen.
 6 BY MR. NADELHAFT:
 7 Q Dr. Blaustein, can you see this document?
 8 **A Yes, I can.**
 9 Q Okay. This is Blaustein-1. And it's an
 10 e-mail from Dr. Kipper to Christi Dembrowski on
 11 August 18, 2014. Do you see that?
 12 **A Yes.**
 13 Q Do you recall if Dr. Kipper ever showed
 14 you this e-mail he sent to Ms. Dembrowski?
 15 **A I don't think I've ever seen this.**
 16 Q Okay. Do you know who Christi Dembrowski
 17 is?
 18 **A I know that Mr. Depp had a sister; I think**
 19 **her name is Christi, but I -- is that the same**
 20 **person?**
 21 Q Yeah. I'll represent to you that Christi
 22 Dembrowski is Mr. Depp's sister.

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1 **A Okay.**
 2 Q Mr. -- Dr. Kipper writes at the top, I'm
 3 alerting you to some concerning issues that arose
 4 last night after we spoke. Amber called us at
 5 around midnight asking that we come over her
 6 house. They evidently had a fight, she claims he
 7 pushed her and she asked him to leave the house.
 8 Did you -- did you ever have an
 9 understanding that Mr. Depp pushed Amber?
 10 MR. PRESIADO: Objection; lacks
 11 foundation --
 12 THE WITNESS: No.
 13 MR. PRESIADO: -- calls for speculation.
 14 THE WITNESS: No.
 15 Q And --
 16 MR. PRESIADO: And, I'm sorry, if I can
 17 say: Assumes facts not in evidence.
 18 Q At the bottom of the first page, second
 19 paragraph, it says, It's difficult for me to read
 20 too much into the conversation that followed.
 21 He -- being Johnny Depp -- is uncomfortable, is
 22 pessimistic that he'll ever be able to stop doing

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1 drugs, actually romanticizes the entire drug
 2 culture, and has no accountability for his
 3 behaviors.
 4 In your working with Mr. Depp did you see
 5 Mr. Depp romanticize the drug culture?
 6 **A That's -- that's not phrased as I**
 7 **understand it in a meaningful way; romanticizing**
 8 **the drug culture.**
 9 MR. PRESIADO: Objection; vague and
 10 ambiguous.
 11 THE WITNESS: I -- I can't -- I can't
 12 answer that question.
 13 Q Then it says, and has no accountability
 14 for his behaviors.
 15 In working with Mr. Depp, did he -- did
 16 you believe he presented accountability for his
 17 behaviors?
 18 MR. PRESIADO: Objection; lacks
 19 foundation, calls for speculation.
 20 THE WITNESS: You know, it's -- it's a
 21 funny phrase. I -- I think he acknowledged his
 22 behaviors. I think he was working to change some

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1 of his behaviors. And I don't -- accountability
 2 for behaviors is an odd phrase for me that I can't
 3 really address.
 4 BY MR. NADELHAFT:
 5 Q What behaviors did Mr. Depp acknowledge
 6 that should be changed?
 7 **A Certainly, his drug use, and his turning**
 8 **to drugs for -- to help relieve a lot of the**
 9 **psychic pain that he was experiencing.**
 10 Q Any other behaviors?
 11 **A I can't recall at this time.**
 12 Q And then the bottom of this first page
 13 says, This conversation was unfortunately --
 14 MR. NADELHAFT: And can we move to the
 15 next page.
 16 Q This conversation was unfortunately
 17 wrapped around a centerpiece of bad feelings with
 18 Amber. He has fundamental issues with anger, and
 19 when he gets mad at her for bad behavior he has
 20 tremendous ambivalence and guilt about those
 21 feelings even being valid.
 22 In working with Mr. Depp would you agree

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<p>49</p> <p>1 that he had fundamental -- that Mr. Depp had 2 fundamental issues with anger? 3 MR. PRESIADO: Objection; vague and 4 ambiguous, lacks foundation, calls for 5 speculation. And also I would object to -- and 6 compound. And I object to you reading from this 7 document and then asking a separate question 8 within -- presuming -- you presume is a single 9 question. 10 Q You can answer. 11 A I -- I would say that he expressed having 12 issues with anger. 13 Q Mr. Depp expressed having issues with 14 anger? 15 A Yes. 16 Q Did Mr. Depp express having issues of 17 anger towards Amber? 18 A He expressed having anger towards her, 19 yes. 20 Q Do you recall what reasons Mr. Depp told 21 you as to why he was expressing anger towards 22 Amber?</p> <p>50</p> <p>1 A I can't -- you know, no. I'll have to say 2 no. 3 Q Did -- in working with Mr. Depp, was he 4 ever suspicious of Amber having affairs? 5 A I can recall now he expressed feelings of 6 jealousy, but I don't remember if it was about 7 affairs. 8 Q Do you recall any more detail about what 9 Mr. Depp was feeling jealousy toward Amber about? 10 A No. 11 Q Did Mr. -- in working with Mr. Depp did he 12 ever express feeling guilt about anything he did 13 towards Amber? 14 MR. PRESIADO: Objection; assumes facts 15 not in evidence, vague and ambiguous. 16 THE WITNESS: I don't remember him 17 articulating that, no. 18 Q Did you -- in working with Mr. Depp did 19 you see that he -- Mr. Depp had any issues with 20 patience? 21 A Patience with a C. Was he impatient, you 22 mean?</p>	<p>51</p> <p>1 Q Correct, impatient. 2 A Yes, he was impatient. 3 Q Would you agree that Mr. Depp had no 4 patience for not getting his needs met? 5 MR. PRESIADO: Objection; vague and 6 ambiguous, incomprehensible. 7 Q You can answer. 8 A I -- yeah, I'm just thinking about it. 9 I -- I certainly wouldn't characterize it that 10 way. 11 Q How would you characterize it? 12 A That he was impatient. 13 Q What reason -- what -- in working with 14 Mr. Depp, what would make Mr. Depp impatient? 15 MR. PRESIADO: Objection; asked and 16 answered, calls for speculation. 17 THE WITNESS: I can't recall specifically. 18 MR. NADELHAFT: Okay. Can we move down 19 just to the bottom of page 2. Okay. Yeah, let's 20 have the bottom of page 2 into page 3. That's 21 good. 22 Q You see where it says, For my two cents I</p> <p>52</p> <p>1 think he needs to remain committed, endure some 2 discomfort (he's actually had very little), get 3 neurochemically stable, seek an ongoing 4 therapeutic relationship with a doctor I know that 5 could help him, and get into the recovery 6 community on whatever level he would accept. 7 Do you see that? 8 A I do. 9 Q Does this e-mail at all refresh your 10 recollection of whether Dr. Kipper spoke to you 11 around this time about working with Mr. Depp on 12 these issues? 13 A When -- when you say refresh my 14 recollection, I said he spoke to me about -- about 15 this patient, so I'm -- what -- what's the 16 question? 17 Q So, this e-mail is from August of 2014. 18 Did you -- do you recall if Dr. Kipper spoke to 19 you around August of 2014 regarding working with 20 Mr. Depp? 21 A Without looking at my notes, there's no 22 time reference to August 2014. I know only that I</p>
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<p style="text-align: right;">53</p> <p>1 saw him in late 2014/early 2015, but I –</p> <p>2 Q Okay.</p> <p>3 A – can't recall when I would have spoken</p> <p>4 to him.</p> <p>5 MR. NADELHAFT: Can we put up what's</p> <p>6 marked as attachment 5.</p> <p>7 AV TECHNICIAN: Stand by.</p> <p>8 Would you like me to cover the previous</p> <p>9 stickers on these exhibits or --</p> <p>10 MR. NADELHAFT: Sure, yeah, that's fine.</p> <p>11 AV TECHNICIAN: Okay.</p> <p>12 (Exhibit 2, Chain of e-mails dated 9/18/14</p> <p>13 and 9/21/14, Bates Nos. DEPP00001639 AND</p> <p>14 DEPP00001640, was marked for identification and is</p> <p>15 attached to the transcript.)</p> <p>16 MR. NADELHAFT: I'm showing Exhibit 2 on</p> <p>17 the screen.</p> <p>18 If we can blow it up a little bit. And,</p> <p>19 actually, if you can give me control when you blow</p> <p>20 it up, too, that would be great.</p> <p>21 AV TECHNICIAN: If you click on the screen</p> <p>22 you'll have control.</p>	<p style="text-align: right;">55</p> <p>1 A Yes.</p> <p>2 Q In this e-mail Dr. Kipper writes: Alan, I</p> <p>3 am in London coming home today, after spending a</p> <p>4 week with a patient we discussed, JD.</p> <p>5 "JD" is Johnny Depp, correct, as you</p> <p>6 understand it?</p> <p>7 A As I understand it, yes.</p> <p>8 Q What do you recall about the conversation</p> <p>9 you had with Dr. Kipper regarding Johnny Depp</p> <p>10 around -- sometime around September of 2014 before</p> <p>11 this e-mail?</p> <p>12 A I don't recall.</p> <p>13 Q Dr. Kipper writes: He's anxious to begin</p> <p>14 a relationship with you and I would love to "seize</p> <p>15 the moment." Obviously this would need to be a</p> <p>16 phone introduction, and perhaps just that. He's</p> <p>17 coming to Los Angeles mid-October and will be in</p> <p>18 Los Angeles until the early spring. He is doing</p> <p>19 remarkably well. I have him on a combination of</p> <p>20 Lamictal 50 milligrams, Lexapro 30 milligrams,</p> <p>21 melatonin at HS, Seroquel 25 BID, and 50 at HS,</p> <p>22 and an occasional Inderal LA 80 milligrams.</p>
<p style="text-align: right;">54</p> <p>1 BY MR. NADELHAFT:</p> <p>2 Q Dr. Blaustein, I'm showing you what's been</p> <p>3 marked as Blaustein Exhibit 2, DEPP 1639, which is</p> <p>4 an e-mail chain between you and Dr. Kipper. Do</p> <p>5 you see that?</p> <p>6 A I do.</p> <p>7 Q And you see on September 18, 2014</p> <p>8 Dr. Kipper wrote an e-mail to you?</p> <p>9 A I do.</p> <p>10 Q And do you recall how often you would</p> <p>11 e-mail with Dr. Kipper about Mr. Depp's care?</p> <p>12 A I do not.</p> <p>13 Q Did you ever text with Dr. Kipper about</p> <p>14 Mr. Depp's care?</p> <p>15 A I can't recall if I did, but I could have.</p> <p>16 Q Do you know if you'd still have the text</p> <p>17 messages in your possession if you did text with</p> <p>18 Dr. Kipper?</p> <p>19 A I doubt it. I'm three, four, five phones</p> <p>20 down from 2014.</p> <p>21 Q Is it -- would you have the same phone</p> <p>22 number that you had from 2014 that you do now?</p>	<p style="text-align: right;">56</p> <p>1 Do you see that?</p> <p>2 A Yes.</p> <p>3 Q What is -- what drug is Lamictal?</p> <p>4 A I'm sorry, say that again.</p> <p>5 Q The first drug he mentions, what drug is</p> <p>6 Lamictal? What is that -- what is that for?</p> <p>7 MR. PRESIADO: Objection --</p> <p>8 THE WITNESS: Again, that requires --</p> <p>9 MR. PRESIADO: -- calls for speculation,</p> <p>10 lacks foundation.</p> <p>11 THE WITNESS: That requires an expert</p> <p>12 opinion. I'm not going to answer that.</p> <p>13 Q Well, this is -- this is from an e-mail</p> <p>14 regarding Mr. Depp and regarding Mr. Depp's care</p> <p>15 that Dr. Kipper sent to you. And it --</p> <p>16 A Correct.</p> <p>17 Q I'm just asking for -- as you're reading</p> <p>18 this e-mail, would you --</p> <p>19 Do you know what Lamictal is?</p> <p>20 A Yes.</p> <p>21 Q What -- what type of -- what is Lamictal</p> <p>22 used for?</p>

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57	<p>1 MR. PRESIADO: Objection --</p> <p>2 THE WITNESS: I am a witness to the</p> <p>3 fact that --</p> <p>4 MR. PRESIADO: -- calls for speculation,</p> <p>5 lacks foundation.</p> <p>6 THE WITNESS: I am a witness to the fact</p> <p>7 that Dr. Kipper told me that he was prescribing</p> <p>8 Lamictal to Mr. Depp. I can confirm that.</p> <p>9 BY MR. NADELHAFT:</p> <p>10 Q Respectfully, this is not an expert --</p> <p>11 this is not an expert question. This is just your</p> <p>12 understanding of what Lamictal is for. This is</p> <p>13 not --</p> <p>14 A That I --</p> <p>15 Q Respectfully, sir, this is not an expert</p> <p>16 question. This is -- this is a question that you</p> <p>17 should be able to answer. This is not expert</p> <p>18 testimony.</p> <p>19 MR. PRESIADO: Counsel -- Counsel,</p> <p>20 Dr. Blaustein is not with counsel. I would advise</p> <p>21 you on advising him on his rights with respect to</p> <p>22 this deposition. If he's not comfortable</p>	59	<p>1 be used as a natural supplement to help with</p> <p>2 sleep.</p> <p>3 Q What does "HS" mean? What did you</p> <p>4 understand "HS" to mean?</p> <p>5 A It means at bedtime.</p> <p>6 Q "HS" means at bedtime?</p> <p>7 A Yes.</p> <p>8 Q Okay. What is Seroquel used for?</p> <p>9 A I will say to you, Adam, but the fact that</p> <p>10 you didn't know what "HS" means in common</p> <p>11 knowledge, it required a medical person to be able</p> <p>12 to say what "HS" means, and it demonstrates the</p> <p>13 idea that there were things that are not in common</p> <p>14 knowledge, they're not part of my observation and</p> <p>15 things I heard or saw that you're asking me about</p> <p>16 that I -- again, I'm not going to be answering</p> <p>17 today.</p> <p>18 Q I was -- I've been asking you questions</p> <p>19 all day long -- all -- for the last while. So --</p> <p>20 A Okay.</p> <p>21 Q -- there's plenty of things I know that</p> <p>22 are -- I'm just asking you questions.</p>
58	<p>1 answering that, and he chooses not to, that's his</p> <p>2 choice. But for you to counsel him on what you</p> <p>3 believe he's obligated to do in this deposition I</p> <p>4 think is improper, particularly since he's without</p> <p>5 counsel today.</p> <p>6 BY MR. NADELHAFT:</p> <p>7 Q What is Lamictal -- Lamictal used for?</p> <p>8 A Again, I -- I will not answer that</p> <p>9 question because I think it requires an expert</p> <p>10 testimony. It's not common knowledge what</p> <p>11 Lamictal is. I'm being called here as a</p> <p>12 percipient witness.</p> <p>13 As to what he observed, I can confirm that</p> <p>14 Dr. Kipper advised me by this e-mail that that was</p> <p>15 the medication that he was prescribing for</p> <p>16 Mr. Depp. But what that medication is for or why</p> <p>17 he was prescribing it to him are things that I</p> <p>18 think are more for an expert to testify about.</p> <p>19 Q What is Lexapro used for?</p> <p>20 A Same objection.</p> <p>21 Q What is melatonin used for?</p> <p>22 A Melatonin, I think, is common knowledge to</p>	60	<p>1 A Okay.</p> <p>2 Q What is Seroquel used for?</p> <p>3 A Same objection.</p> <p>4 Q What does it mean where it says -- what</p> <p>5 did you understand it to mean where it says</p> <p>6 "Seroquel 25 bid"?</p> <p>7 A B-I-D is twice a day.</p> <p>8 Q And what is Inderal LA used for?</p> <p>9 A Same objection.</p> <p>10 Q And you're not going to answer that?</p> <p>11 A Correct.</p> <p>12 Q And what does "LA" stand for?</p> <p>13 A I think it might be long-acting, but I'm</p> <p>14 not sure.</p> <p>15 Q Then Dr. Kipper writes: He's with his</p> <p>16 girlfriend, Amber, and there are issues that we</p> <p>17 can discuss privately and not on the Internet.</p> <p>18 Did you have a conversation about -- with</p> <p>19 Dr. Kipper about the issues Mr. Depp had with</p> <p>20 Amber?</p> <p>21 A Yes.</p> <p>22 Q What did Dr. Kipper say?</p>

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<p>1 MR. PRESIADO: Objection; calls for 2 hearsay. 3 THE WITNESS: I don't remember. 4 BY MR. NADELHAFT: 5 Q You don't recall anything that Dr. Kipper 6 had to say to you about issues that Mr. Depp had 7 with Amber? 8 MR. PRESIADO: Objection; calls for 9 hearsay, asked and answered. 10 THE WITNESS: No, I do not. 11 Q But you recall that there was a 12 conversation that you had with Dr. Kipper about 13 issues that Mr. Depp had with Amber? 14 A I'm assuming that's true from this e-mail, 15 but I don't have a specific recollection of it. 16 Q Do you have a general recollection of the 17 conversation? 18 A It wouldn't be of the specific 19 conversation, but general recollections of 20 conversations I had with him about this patient, I 21 do have some, as indicated. 22 Q What are the general recollections you</p>	<p>61</p> <p>1 A It was a very chaotic relationship with a 2 lot of fluctuations and ups and downs and lots of 3 difficulty and emotional expressions and lots of 4 anger in both places, and, you know, high- 5 intensity affect and emotional expression. A lot 6 of love, a lot of disappointment, a lot of fears. 7 Q Did you say "a lot of fears"? 8 A Fears, uh-hum. 9 Q What do you mean by "a lot of fears"? 10 A Should I get married? What -- what are 11 the downsides of what could happen if I get 12 married? What will happen with my relationship 13 with my children? 14 Q Any other fears you recall? 15 A I just heard my computer ding. Excuse me. 16 I'm going to make sure that my "Do Not Disturb" is 17 on here. Okay. 18 Not at this time, no. 19 Q You said something about "affect." What 20 did you -- could you repeat what you said about 21 "affect" in regards to the relationship between 22 Ms. Heard and Mr. Depp.</p>
<p>62</p> <p>1 have of the conversations you had with Dr. Kipper 2 about his relation- -- about Mr. Depp's 3 relationship with Amber? 4 MR. PRESIADO: Objection; calls for 5 hearsay. 6 THE WITNESS: My problem in answering this 7 question is that there -- I don't have a specific 8 recollection of sources and how that came about. 9 So what I heard from Mr. Depp or what, maybe, I 10 heard from the nurse or what I heard from 11 Dr. Kipper is not distinct in my mind as to where 12 the source would be. So when I would give you -- 13 if I answered that question about my general 14 recollection, I couldn't say for sure that it was 15 a conversation that I had with Dr. Kipper 16 specifically. 17 Q What is your understanding about issues 18 that Mr. Depp had with Amber? 19 MR. PRESIADO: Objection; vague and 20 ambiguous. 21 THE WITNESS: It's a very chaotic -- 22 Q You can answer.</p>	<p>63</p> <p>1 A I said intense affect. 2 Q What -- what do you mean by "intense 3 affect"? 4 A Intense emotional expression. 5 Q What does that mean? What do you mean by 6 "intense emotional expression"? 7 A I'm not sure how to define it. Yeah, I 8 would say a lot of ang- -- a lot of anger, a lot 9 of love, a lot of fears. 10 Q Do you have any examples of how Mr. Depp 11 expressed intense emotional expressions to Amber? 12 A I can't recall specific -- specific 13 expressions, no. 14 Q Do you recall any -- any examples of anger 15 that Mr. Depp expressed towards Amber? 16 A No. 17 Q And in this e-mail -- back to Blaustein-2, 18 Dr. Kipper says, If you'd be able to make a phone 19 introduction over the weekend, I can arrange for 20 this. 21 Do you see that? 22 A Yes.</p>

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1 Q And if we go up the e-mail --
 2 You respond to Dr. Kipper, correct, on
 3 September 18, 2014?
 4 A Yes.
 5 Q And you say, Let's try on Sunday around
 6 11 a.m. LA time.
 7 Do you see that?
 8 A I see that.
 9 Q And that would be to have a phone
 10 introduction with Mr. Depp, correct?
 11 A I assume -- well, it could have been
 12 Mr. Depp or with Dr. Kipper. But I assume it's
 13 Mr. Depp, yeah.
 14 Q Okay. And then on September 21st you
 15 write: Hi David. Just texted you. Never heard
 16 back from you on this, so I'm assuming there's no
 17 call scheduled.
 18 Do you see that?
 19 A Yes.
 20 Q Okay. So at least as of September 21,
 21 2014, you had not yet spoken to Mr. Depp, correct?
 22 A From this I assume so.

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1 Q Okay.
 2 MR. NADELHAFT: You can take this down,
 3 and can we put up attachment 4.
 4 AV TECHNICIAN: Stand by.
 5 (Exhibit 3, Statement, Bates Nos.
 6 BLAUSTEIN0000006 and BLAUSTEIN0000007, was marked
 7 for identification and is attached to the
 8 transcript.)
 9 AV TECHNICIAN: Showing Exhibit 3 on the
 10 screen.
 11 MR. NADELHAFT: I have control, correct?
 12 AV TECHNICIAN: Yeah. If you click on the
 13 screen, yeah.
 14 Q Dr. Blaustein, I'm showing you what's been
 15 marked as Blaustein Exhibit 3. Do you recognize
 16 this document?
 17 A Yes.
 18 Q Okay. What is it?
 19 A It's a -- my invoice billing document.
 20 Q And this is from your files?
 21 A Correct.
 22 Q And you keep this document in the ordinary

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1 course of business?
 2 A Correct.
 3 Q Is this -- is this your handwriting?
 4 A Yes, it is.
 5 Q Okay. I'm just going to go through it.
 6 You see where it says Date -- there is a column
 7 that says Date, correct?
 8 A Correct.
 9 Q And then the next column is Professional
 10 Service, correct?
 11 A Correct.
 12 Q All right. And the next column is charge,
 13 that's how much you're charging for that
 14 particular service on that particular day?
 15 A Correct.
 16 Q Okay. And then the balance is how much
 17 is -- would be owed, correct?
 18 A Correct.
 19 Q And this billing invoice is for -- is for
 20 Johnny Depp, correct?
 21 A Correct.
 22 Q And is it -- did you send this bill to

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1 Erica Wright? Is that what the address is
 2 showing?
 3 A Yes.
 4 Q Did you say "Yes"?
 5 A Yes.
 6 Q Okay. Okay. And so where it says
 7 10/2/14, from your billing records, would this be
 8 the -- is this your understanding the first time
 9 you met with Mr. Depp?
 10 A By phone, yes.
 11 Q Okay. That was going to be my next
 12 question. So "TC," does that mean telephone call?
 13 A Correct.
 14 Q And you spoke to Mr. Depp for 60 minutes
 15 on the phone?
 16 A Correct.
 17 Q And for an hour you charge \$650?
 18 A Correct.
 19 Q And then the next -- the next line is
 20 10/7/14, correct?
 21 A Correct.
 22 Q And you had a telephone call with Mr. Depp

<p style="text-align: right;">69</p> <p>1 for 30 minutes?</p> <p>2 A Correct.</p> <p>3 Q And the next line is 10/8/14, correct?</p> <p>4 A Correct.</p> <p>5 Q And then what does it say under</p> <p>6 Professional Service?</p> <p>7 A TC 45 - CAN less than 72h.</p> <p>8 Q What does that mean? What does the "CAN</p> <p>9 less than 72h" mean?</p> <p>10 A That -- that was a cancellation of that</p> <p>11 session with less than 72 hours' notice.</p> <p>12 Q Okay.</p> <p>13 A 72 hours being the required notice to not</p> <p>14 be charged.</p> <p>15 Q Okay. So would that mean that on</p> <p>16 October 8, 2014; October 14, 2014; and October 15,</p> <p>17 2014, there were three 45-minute session --</p> <p>18 telephone call sessions scheduled with Mr. Depp</p> <p>19 that were cancelled less than 72 hours before?</p> <p>20 A Correct.</p> <p>21 Q And then on October 21, 2014, you spoke on</p> <p>22 the phone with Mr. Depp for 45 minutes?</p>	<p style="text-align: right;">71</p> <p>1 a -- you'll see the legend for that, IND-</p> <p>2 Individual Psychotherapy.</p> <p>3 Q Right. Okay. Thank you.</p> <p>4 Is it -- is it -- do you typically not</p> <p>5 have telephone consultations? I notice that's not</p> <p>6 one of the items you have on your legend at the</p> <p>7 bottom.</p> <p>8 MR. PRESIADO: Objection; compound.</p> <p>9 THE WITNESS: I think probably the bottom</p> <p>10 of that is cut off. There possibly is a TC legend</p> <p>11 there. But in those days it was atypical for me</p> <p>12 to have telephone consultations with patients</p> <p>13 before the pandemic. It wasn't something that was</p> <p>14 a regular part of practice.</p> <p>15 Q And when you were having the telephone</p> <p>16 consultations with Mr. Depp, was it by the -- by</p> <p>17 telephone or was it by some other means?</p> <p>18 A By telephone.</p> <p>19 Q Okay. Then at 10/30/14 it says TC 45.</p> <p>20 And then what does it say after that?</p> <p>21 A That's NS for no-show. That was</p> <p>22 neither -- it was not cancelled and he didn't</p>
<p style="text-align: right;">70</p> <p>1 A He was charged for a 45-minute session,</p> <p>2 yes. I don't know if it was a full 45 minutes.</p> <p>3 Mr. Depp oftentimes came -- came late to</p> <p>4 appointments, so I couldn't say.</p> <p>5 Q Okay. And then -- but October 21, 2014</p> <p>6 you would have -- this shows that you would have</p> <p>7 met with Mr. Depp for at least some period of</p> <p>8 time, correct?</p> <p>9 A By phone, yes.</p> <p>10 Q By phone. Thank you.</p> <p>11 And is this next one October 27, 2014, you</p> <p>12 would have met with Mr. Depp by phone for some</p> <p>13 period of time?</p> <p>14 A Correct.</p> <p>15 Q And now the 10/29/14, what does it mean</p> <p>16 for Professional Service there?</p> <p>17 A Individual psychotherapy, and that would</p> <p>18 have been in person.</p> <p>19 Q So INS means individual psychotherapy?</p> <p>20 A "IND," yes.</p> <p>21 Q "IND." Okay. Great.</p> <p>22 A Adam, if you look on the bottom there's</p>	<p style="text-align: right;">72</p> <p>1 appear for that appointment.</p> <p>2 Q Okay. And then at 11/4/14, it says TC -</p> <p>3 Dr. Kipper - 15, correct?</p> <p>4 A Correct.</p> <p>5 Q And that means you had a telephone call</p> <p>6 with Dr. Kipper about Mr. Depp for 15 minutes?</p> <p>7 A Correct.</p> <p>8 Q And 11/4/14, Mr. Depp was scheduled to</p> <p>9 come in for -- for therapy?</p> <p>10 A Correct.</p> <p>11 Q And the NS means Mr. Depp did not show up?</p> <p>12 A Correct.</p> <p>13 Q Okay. And then at 11 -- on 11/6, 11/10,</p> <p>14 and 11/11/14, Mr. Depp showed up for his therapy,</p> <p>15 correct?</p> <p>16 A Correct.</p> <p>17 Q And 11/13/14, what is it indicating there?</p> <p>18 A Cancelled less than 72 hours.</p> <p>19 Q So there wasn't a session with Mr. Depp on</p> <p>20 11/13/14, correct?</p> <p>21 A 11/13/14, right.</p> <p>22 Q Okay. And 11/24/14, Mr. Depp showed up</p>

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73	<p>1 for face-to-face therapy for 45 minutes, correct?</p> <p>2 A Again, I can't say if it was for</p> <p>3 45 minutes but it was scheduled for 45 minutes.</p> <p>4 Q But Mr. Depp did come into your office on</p> <p>5 11/24/14 for at least some period of time?</p> <p>6 A Yes.</p> <p>7 Q Okay. And then on 11/25/14, the session</p> <p>8 with Mr. Depp was cancelled without 72 hours'</p> <p>9 notice, correct?</p> <p>10 A Correct.</p> <p>11 Q The last -- okay.</p> <p>12 And 12/1/14 Mr. Depp showed up for some</p> <p>13 period of time in your office, correct?</p> <p>14 A Correct.</p> <p>15 Q And 12/4/14 you had a telephone</p> <p>16 consultation with Mr. Depp, correct?</p> <p>17 A Correct.</p> <p>18 Q Is that 12/8/14, the next entry?</p> <p>19 A Yes.</p> <p>20 Q And that was a session that Mr. Depp</p> <p>21 cancelled without 72 hours' notice, correct?</p> <p>22 A Correct.</p>	75	<p>1 came in for in-person visits with you, correct?</p> <p>2 A Correct.</p> <p>3 Q And 12/17/14 the in-person visit was</p> <p>4 cancelled, correct?</p> <p>5 A Correct.</p> <p>6 Q And 12/18/14 you had a telephone call with</p> <p>7 Mr. Depp, correct?</p> <p>8 A Correct.</p> <p>9 Q And 12/23/14 you had an in-person visit</p> <p>10 with Mr. Depp, correct?</p> <p>11 A Correct.</p> <p>12 Q Okay. And then 1/6/15 it shows you had an</p> <p>13 in-person visit with Mr. Depp, correct?</p> <p>14 A Correct.</p> <p>15 Q And, now, that says 60 as opposed to</p> <p>16 the -- most of the other ones we looked at were</p> <p>17 just saying 45. Do you know the reason that this</p> <p>18 was 60 minutes versus 45 minutes?</p> <p>19 A I can speculate. Would you like me to</p> <p>20 speculate?</p> <p>21 Q Yeah.</p> <p>22 MR. PRESIADO: Objection; calls for</p>
74	<p>1 Q And then at 12/10/14 you had a session</p> <p>2 with Mr. Depp in person, correct?</p> <p>3 A Correct.</p> <p>4 Q And on 12/10/14 you had a telephone call</p> <p>5 with Dr. Kipper for 15 minutes about Mr. Depp,</p> <p>6 correct?</p> <p>7 A Correct.</p> <p>8 Q Did you typically charge clients for phone</p> <p>9 calls you had with the other doctors about them?</p> <p>10 A Depends on the length of time. If it was</p> <p>11 just a few-minute check-in, no. But at the point</p> <p>12 it reached 15 minutes or more, then yes, I would.</p> <p>13 Q Okay. And did you -- would you take notes</p> <p>14 of your call with Dr. Kipper?</p> <p>15 A I don't think so.</p> <p>16 Q Do you have any recollection of what the</p> <p>17 call with Dr. Kipper was about on 12/10/14?</p> <p>18 A No.</p> <p>19 Q Did you say "No"?</p> <p>20 A Yes, I said no.</p> <p>21 Q Okay. Right.</p> <p>22 And then 12/11 and 12/15/2014 Mr. Depp</p>	76	<p>1 speculation.</p> <p>2 THE WITNESS: My guess would be that he</p> <p>3 came very late to the session, and I could go over</p> <p>4 by 15 minutes to make it closer to a full session,</p> <p>5 but I -- that's, as I say, speculation.</p> <p>6 BY MR. NADELHAFT:</p> <p>7 Q Okay. And then on 1/7/15 you had a</p> <p>8 telephone call with Mr. Depp?</p> <p>9 A Yes.</p> <p>10 Q And 1/8/15 you had a 45-minute session</p> <p>11 with Mr. Depp; is that right?</p> <p>12 A Correct.</p> <p>13 Q And on 1/12/15 Mr. Depp did not show up</p> <p>14 for his appointment?</p> <p>15 A Correct.</p> <p>16 Q And on 1/14/15 Mr. Depp cancelled his</p> <p>17 appointment without 72 hours' notice, correct?</p> <p>18 A Correct.</p> <p>19 Q And on 3/6/15 you had a 30-minute call</p> <p>20 with Dr. Kipper, correct?</p> <p>21 A Correct.</p> <p>22 Q Okay.</p>

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1 THE VIDEOGRAPHER: I don't mean to
 2 interrupt, Counsel, but when you find a good
 3 breaking point, I just need to start a new video.
 4 MR. NADELHAFT: Sure. I'm going to be --
 5 in a minute. We can end on this.
 6 BY MR. NADELHAFT:
 7 Q And then on 3/30/15 you had a telephone
 8 call with Dr. Kipper for 30 minutes, correct?
 9 A Correct.
 10 Q Does -- do these -- does this invoice
 11 reflect all of the visits or potential visits you
 12 were going to have -- you had with Mr. Depp and/or
 13 Dr. Kipper regarding Mr. Depp?
 14 A Please repeat the question.
 15 Q This invoice --
 16 A Maybe separate that -- maybe separate out
 17 the question.
 18 Q Sure. Let's do it this way: Does this
 19 invoice that we just went through reflect all of
 20 the visits and/or visits that were cancelled that
 21 you had with Mr. Depp?
 22 A I believe so, yes.

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1 Q Okay. And are -- does this invoice
 2 reflect all of the phone calls you had with
 3 Dr. Kipper in which you billed Mr. Depp for
 4 regarding Mr. Depp's care?
 5 A It reflects all the calls I had with
 6 Dr. Kipper that I billed for. It's possible I had
 7 another call or two that were short or brief or
 8 checking about a specific thing that wouldn't have
 9 been reflected here.
 10 Q Okay.
 11 MR. NADELHAFT: All right. Thank you.
 12 Why don't we take a break now.
 13 THE VIDEOGRAPHER: Off the record --
 14 THE WITNESS: All right. How long of a
 15 break are we going to take?
 16 THE VIDEOGRAPHER: Off the record at one
 17 third- -- sorry, 1:56.
 18 (Recess was held.)
 19 THE VIDEOGRAPHER: We're back on the
 20 record at 2:06.
 21 BY MR. NADELHAFT:
 22 Q Welcome back, Dr. Blaustein.

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1 A Thank you.
 2 Q Going back to the last exhibit, Blaustein
 3 Exhibit 3, the first time you saw or spoke with
 4 Dr. -- with Mr. Depp as a patient was October 2,
 5 2014, correct?
 6 A Yeah. It would -- the purpose of that
 7 discussion, as I recall, was to discuss whether he
 8 should become my patient. So it's -- but yes,
 9 that's the first time I spoke to him.
 10 Q Okay. The first time you billed for your
 11 services for Mr. Depp was on October 2, 2014,
 12 correct?
 13 A Correct. Correct.
 14 Q And the last time you billed for services
 15 for Mr. Depp was on January 8th -- well, no. Let
 16 me step back.
 17 The last time you either saw or spoke to
 18 Mr. Depp as a patient was on January 8, 2015,
 19 correct?
 20 A Correct. There might have been a time
 21 shortly after that that I spoke with him by phone
 22 for a moment. But, again, I can't recall

80

1 specifically. But the last time anything of
 2 substance would be the January 8th, yes.
 3 Q Okay. And so you worked with Mr. Depp for
 4 approximately three months?
 5 A Yeah; on and off.
 6 Q Okay. Was there a -- when you first began
 7 working with Mr. Depp, was there a schedule you
 8 were planning to keep with Mr. Depp as to how many
 9 sessions you would have with him per week?
 10 A I suggested twice a week initially.
 11 Q And that -- did that -- did the twice a
 12 week change?
 13 A We didn't actually meet twice a week.
 14 Q And was it -- were you planning on meeting
 15 with Mr. Depp twice a week for 45 minutes each
 16 session?
 17 A That would have been the plan, yes.
 18 Q And in total, if we look at the number of
 19 sessions you either met or spoke to Mr. Depp that
 20 weren't cancelled or he didn't show up, my count
 21 it comes to nine- -- 18 times you met with
 22 Mr. Depp. Does that sound about right?

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<p style="text-align: right;">81</p> <p>1 MR. PRESIADO: Objection; the document 2 speaks for itself. 3 THE WITNESS: If you go to the next page 4 and I'll take a look. I'm counting there with 5 you. 6 It looks like 18 times. 7 MR. NADELHAFT: And we can take this down. 8 And can you put up 6, please. 9 AV TECHNICIAN: Stand by. 10 (Exhibit 4, 10/26/14 e-mail, Bates No. 11 BLAUSTEIN0000021, was marked for identification 12 and is attached to the transcript.) 13 AV TECHNICIAN: I'm showing Exhibit 4 on 14 the screen. 15 MR. NADELHAFT: And if you can give me 16 control. Thank you. 17 BY MR. NADELHAFT: 18 Q Dr. Blaustein, I'm showing you what's been 19 marked as Exhibit 4 to your deposition. Do you 20 recognize this document? 21 A I do. 22 Q What is it?</p>	<p style="text-align: right;">83</p> <p>1 A I think so, yes. 2 Q Is this your handwriting on the document, 3 or your markings? 4 A You mean the dashes and the question 5 marks? Yes. 6 Q Yes. 7 A That's my handwriting. 8 Q Okay. And at the top there is a circle of 9 October 26, 2014. Do you see that? 10 A I see that, uh-hum. 11 Q Do you know -- do you know why you circled 12 that date? 13 A I do not know. 14 Q And Ms. Lloyd writes: Dr. Blaustein - Per 15 your request, here is the current list of JD's 16 medications. 17 Do you see that? 18 A Yes. 19 Q And why were you requesting what 20 medications Mr. Depp was on? 21 A As his psychotherapist and psychiatrist, I 22 thought it would be important for me to know that.</p>
<p style="text-align: right;">82</p> <p>1 A This would be a list of medications that 2 Mr. Depp was taking that the nurse had sent to me. 3 Q "The nurse" being Debbie Lloyd? 4 A Yes. 5 Q And what -- what did you understand Debbie 6 Lloyd's relationship was to -- as to Mr. Depp? 7 A He was -- she was -- she was his nurse. 8 Q And did -- when you say she was -- 9 Ms. Lloyd was Mr. Depp's nurse, was it your 10 understanding that she would be available to 11 Mr. Depp when he needed her? 12 MR. PRESIADO: Objection; calls for 13 speculation, lacks foundation. 14 THE WITNESS: I don't have any way of 15 knowing that. 16 Q Okay. Did you understand that Ms. Lloyd 17 worked for Dr. Kipper? 18 A I don't know if she was an employee or an 19 independent contractor, but I know that she 20 reported in some way to Dr. Kipper. 21 Q And you -- you produced this e-mail in 22 this case, correct?</p>	<p style="text-align: right;">84</p> <p>1 Q Why was that important to Mr. Depp's care, 2 what medications he was on? 3 A I think that's fundamental to being a 4 psychiatrist, to know the medications that a 5 patient is taking. 6 Q Well, can you give me more? Why -- are 7 you -- are there concerns you have about what 8 medications that somebody's on, or Mr. Depp is on? 9 Why was it important as a psychiatrist to know 10 what medications Mr. Depp was on? 11 MR. PRESIADO: Objection; compound. 12 THE WITNESS: I think it's important for 13 any doctor treating any patient to know all the 14 medications that that patient is taking. 15 Q Did you prescribe Mr. Depp any 16 medications? 17 A I don't think so. 18 Q So if you weren't prescribing Mr. Depp any 19 medications, what was -- what was your purpose in 20 understanding what medications Mr. Depp was on? 21 A Part of being a good doctor to him. I'm 22 not sure I understand the question.</p>

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<p style="text-align: right;">85</p> <p>1 Q When you met with Mr. Depp, either in 2 person or by phone, you -- you had conversations 3 with Mr. Depp, correct? 4 A Correct. 5 Q You didn't -- and, again, you didn't 6 prescribe Mr. Depp any drugs, correct? 7 A I don't recall that I did, no. 8 Q So in -- in your therapy with Mr. Depp, 9 why is it important to know what -- what 10 medications Mr. Depp was on? 11 MR. PRESIADO: Objection; asked and 12 answered. 13 THE WITNESS: I think it's incumbent -- 14 again, I'm going to trip over into expert 15 testimony, but I'll go to this. I think it's 16 incumbent for any physician seeing any patient to 17 know the totality of the medications that they're 18 taking prescribed by all doctors, whether or not 19 that person is -- that doctor is prescribing that 20 medication. It's important to be able to assess 21 what impact medications might have on any 22 particular patient when you think about starting a</p>	<p style="text-align: right;">87</p> <p>1 won't -- 2 Q I'm asking -- 3 A -- answer that. 4 Q I'm sorry. I'm asking as it's related to 5 Mr. Depp and your treatment of Mr. Depp. 6 A Right. But you're asking me about what I 7 observed and what I heard from Mr. Depp, what I 8 articulated to him, not my thoughts about my 9 treatment of him. 10 Q So you're not going to answer questions 11 about your thoughts of your treatment of Mr. Depp 12 either? 13 A My expert thoughts, that's correct, yeah. 14 You know, I'm here as -- I'm here to testify what 15 I heard, what I saw, you know, what my experiences 16 were with me; but not as a psychiatrist. You 17 didn't ask me to come today as a psychiatrist; you 18 asked me to come as a witness, you know, as a fact 19 witness. 20 Q Okay. I guess we'll see what questions 21 that would mean. 22 A Okay.</p>
<p style="text-align: right;">86</p> <p>1 medication, changing a medication, discontinuing a 2 medication. You really need to know the totality 3 of it and -- and try to assess. They interact 4 with each other. 5 BY MR. NADELHAFT: 6 Q So in particular for Mr. Depp, his -- his 7 mood could be affected by a particular medication 8 he's on, correct? 9 A Yes. 10 Q And Mr. Depp's actions are -- could be 11 affected by particular medications that he's on, 12 correct? 13 A As anybody's could, sure. 14 Q Right. And that's why it would be 15 important for you to know what medications 16 Dr. Kipper was prescribing Mr. Depp, correct? 17 A Those would be two reasons. 18 Q What other reasons are there that it's 19 important to know what medications -- 20 A I think I -- I think I listed a lot of 21 them. And again, I think the -- now that crosses 22 over into asking my thoughts as a doctor. And I</p>	<p style="text-align: right;">88</p> <p>1 Q I'm a little unclear, but -- all right. 2 You put a line by Adderall 50 -- 15 3 milligrams -- 4 A You say -- Adam, you say you're unclear, 5 but I'm trying to make this as clear as I can. 6 And I -- when you say "unclear," are you 7 sincere in that? Because I'm not trying to be 8 obstinate here, but what I am trying to do is be 9 very specific in response -- again, in response to 10 your questions, but now that crosses over into 11 expertise that I'm not called here for. So -- I 12 think you understand that part, right? I mean -- 13 and I'll explain it some more if we have to, but 14 I -- 15 Q You don't have to explain any more. I 16 understand you're not an expert witness. I don't 17 under- -- I don't understand what you may not be 18 testifying to regarding your thoughts regarding 19 Mr. Depp's care. But if there's a question you're 20 not going to answer, we'll get to it, that's what 21 I meant by -- 22 A Okay.</p>

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<p>89</p> <p>1 Q -- I didn't understand.</p> <p>2 A Okay. Very good.</p> <p>3 Q We'll see.</p> <p>4 A Very good.</p> <p>5 Q So you -- and then Ms. Lloyd sends you a</p> <p>6 list of the medications that Mr. Depp was on as of</p> <p>7 October 26, 2014, correct?</p> <p>8 A Right.</p> <p>9 Q And this -- this list of medications is</p> <p>10 what you understand were the -- were the</p> <p>11 medications that Dr. Kipper had prescribed to</p> <p>12 Mr. Depp as of October 26, 2014, correct?</p> <p>13 A I believe -- that's the list of medications</p> <p>14 that Debbie Lloyd knew he was taking. I don't</p> <p>15 know if Dr. Kipper prescribed all of that to him</p> <p>16 or not.</p> <p>17 Q Okay. And I just want to -- now I just</p> <p>18 want to have your understanding on a couple</p> <p>19 things. What did you understand QAM to mean?</p> <p>20 A Every morning.</p> <p>21 Q Every morning. Okay.</p> <p>22 And then it says Adderall 15 milligrams.</p> <p>90</p>	<p>91</p> <p>1 A That would have been Johnny.</p> <p>2 Q And the next line says Inderal</p> <p>3 80 milligrams, and you have a question mark for</p> <p>4 that.</p> <p>5 A Uh-hum.</p> <p>6 Q Why did you put a question mark there?</p> <p>7 A I would want to know why that was being</p> <p>8 prescribed to him.</p> <p>9 Q Did you come to an understanding as to why</p> <p>10 Inderal was prescribed to Mr. Depp?</p> <p>11 A I think so, yes.</p> <p>12 Q What -- what's your understanding?</p> <p>13 MR. PRESIADO: Objection to the extent</p> <p>14 it's based on hearsay.</p> <p>15 THE WITNESS: I think it was for anxiety.</p> <p>16 Q And then it says Lexapro 30 milligrams</p> <p>17 with a question mark. Why did you put a question</p> <p>18 mark there?</p> <p>19 A I can't remember. But looking at it now,</p> <p>20 how it strikes me is why that dose.</p> <p>21 Q What struck you about the dose of Lexapro?</p> <p>22 A It was a high dose.</p> <p>92</p>
<p>1 Do you see that?</p> <p>2 A Yes.</p> <p>3 Q And you put a -- a dash by Adderall</p> <p>4 15 milligrams. Why did you do that?</p> <p>5 A That would have been to ask Dr. Kipper</p> <p>6 what the purpose of that medication was.</p> <p>7 Q Did you ask Dr. Kipper about the purpose</p> <p>8 of Adderall for Mr. Depp?</p> <p>9 A I -- I don't recall, but I assume I did.</p> <p>10 Q So you don't -- do you have any</p> <p>11 understanding as to why Mr. Depp was taking</p> <p>12 Adderall?</p> <p>13 A Apparently, it was to help with ADD,</p> <p>14 somebody said, and specifically I think to help</p> <p>15 him at a time that he was working.</p> <p>16 MR. PRESIADO: And I would just insert an</p> <p>17 objection prior to the answer. It calls for</p> <p>18 speculation, lacks foundation, and calls for</p> <p>19 hearsay.</p> <p>20 Q And do you -- you don't -- do you recall</p> <p>21 who told you that the Adderall was to help with</p> <p>22 ADD?</p>	<p>1 Q Did you speak to anyone about the amount</p> <p>2 of Lexapro that was prescribed for Mr. Depp?</p> <p>3 A I imagine I spoke to Dr. Kipper about it.</p> <p>4 I don't have a specific recollection of that.</p> <p>5 Q And the -- the drugs under that are</p> <p>6 Nexium, Seroquel, Lamictal, Neurontin, Cialis, and</p> <p>7 Valtrex. And you understood, in addition to the</p> <p>8 Lexapro, Inderal, and Adderall, that those were</p> <p>9 all medications that Mr. Depp took in the morning?</p> <p>10 A Yes.</p> <p>11 Q And is that a -- is that a line that you</p> <p>12 have by Lamictal on the -- to the right?</p> <p>13 A Yeah.</p> <p>14 Q And -- and what -- what was that line</p> <p>15 referring to?</p> <p>16 A I -- I don't know.</p> <p>17 Q Okay. Did you have any questions about</p> <p>18 the Lamictal that Mr. Depp was taking?</p> <p>19 A No.</p> <p>20 Q And I -- this is -- this is where it would</p> <p>21 be an example. I assume from your previous</p> <p>22 testimony you will not testify as to what any of</p>

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1 those medications do, correct?
 2 **A Correct.**
 3 Q And you won't testify as to what -- why
 4 any person would take those medications, correct?
 5 **A Correct.**
 6 Q Okay. And then at -- under Noon it says
 7 Adderall 15 milligrams, Seroquel 25 milligrams,
 8 and Neurontin 300 milligrams, correct?
 9 **A Correct.**
 10 Q And those are the medications you
 11 understood that Mr. Depp was taking at noon as of
 12 October 26, 2014?
 13 **A Correct.**
 14 Q And you had a line by the Adderall.
 15 **A Uh-hum.**
 16 Q Do you recall what that line was for?
 17 **A The same thing we discussed before.**
 18 Q The question as to why Mr. Depp was taking
 19 Adderall?
 20 **A Correct.**
 21 Q Is there any reason why you checked it
 22 three times in this e-mail?

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1 **A Because it was given three times.**
 2 Q Okay. And then at 4-6 -- and I assume
 3 again, for the noon medications, you're not -- you
 4 won't testify as to what they do or why they're
 5 prescribed for patients, correct?
 6 **A Correct.**
 7 Q And then from 4-6 p.m., it says Adderall
 8 15 milligrams (this might change now that he is
 9 not working), Seroquel 25 milligrams, and
 10 Neurontin 300 milligrams, correct?
 11 **A Correct.**
 12 Q And those were the medications you
 13 understood Mr. Depp was taking between 4:00 and
 14 6:00 p.m. on Oct- -- as of October 26, 2014?
 15 **A Correct.**
 16 Q Okay. And then it says HS. And what does
 17 "HS" stand for again?
 18 **A At bedtime.**
 19 Q Bedtime.
 20 And then it says Ambien 10 milligrams,
 21 Nexium 40 milligrams, Seroquel 50 milligrams,
 22 Neurontin 60 milligrams, and melatonin 20

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1 milligrams, correct?
 2 **A Neurontin says 600 milligrams, not 60.**
 3 Q Oh, 600 milligrams. Thank you.
 4 And those were the drugs and the amounts
 5 you understood Mr. Depp was taking at bedtime as
 6 of October 26, 2014, correct?
 7 **A Correct.**
 8 Q And was it your understanding that
 9 Mr. Depp was taking all of these medications every
 10 day?
 11 **A I would have assumed so, yes.**
 12 Q Okay. And then it says PRN. What does
 13 "PRN" mean?
 14 **A As necessary.**
 15 Q Okay. And as necessary -- and under PRN
 16 it says Neurontin 300mg BID PRN anxiety.
 17 What did you understand that to mean?
 18 **A 300 milligrams twice a day as necessary**
 19 **for anxiety.**
 20 Q Okay. And then it says Xanax
 21 1-2 milligrams as needed for anxiety, correct?
 22 **A BID, as needed for anxiety. Twice a day**

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1 **as needed for anxiety.**
 2 Q Okay. And then it says, on average, he
 3 takes 1 milligram QD.
 4 What do you understand that to mean?
 5 **A Every day.**
 6 Q And then it says Seroquel 50 milligrams
 7 BID PRN anxiety, correct?
 8 **A Correct.**
 9 Q And that's -- and you understood Mr. Depp
 10 was taking Seroquel 50 milligrams twice a day for
 11 anxiety, if he needed it?
 12 **A In addition to the Seroquel he was**
 13 **otherwise prescribed, yes.**
 14 Q Right. And then Ms. Lloyd writes: He's
 15 looking forward to meeting you tomorrow. Things
 16 have been -- things have continued to be chaotic
 17 with his relationship since he last spoke to you.
 18 In the October 26, 2014 time frame, do you
 19 recall what was chaotic in Mr. Depp's
 20 relationship?
 21 **A No.**
 22 Q Okay.

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<p style="text-align: right;">97</p> <p>1 MR. NADELHAFT: We can take this down. 2 And can you put up what's attachment 7. 3 AV TECHNICIAN: Stand by. 4 (Exhibit 5, E-mail dated 11/24/14, Bates 5 No. BLAUSTEIN0000022, was marked for 6 identification and is attached to the transcript.) 7 AV TECHNICIAN: Exhibit 5 is on the 8 screen. 9 BY MR. NADELHAFT: 10 Q Dr. Blaustein, I'm showing you what's been 11 marked as Exhibit 5 to your deposition. Do you 12 recognize this document? 13 A Yes. 14 Q Okay. And this is an e-mail you received 15 from Debbie Lloyd on November 24, 2014? 16 A Yes. 17 Q And this was, again, the medications that 18 Mr. Depp was taking as of November 24, 2014, 19 correct? 20 A That's what she told me he was taking as 21 of November 24, 2014, correct. 22 Q And she -- she writes, The main changes</p>	<p style="text-align: right;">99</p> <p>1 A I think that's right. 2 Q And in the afternoon it shows Mr. Depp 3 taking -- well, go back to the morning. It shows 4 Mr. Depp taking 15 milligrams of Seroquel, 5 correct? 6 A 50 milligrams. 7 Q 50, that's what I -- that's what I said. 8 If I said it wrong, I'm sorry. 50 milligrams of 9 Seroquel in the morning, correct? 10 A Uh-hum, correct. 11 Q Okay. And in the afternoon it takes -- it 12 shows Mr. Depp taking another 50 milligrams of 13 Seroquel, correct? 14 A Correct. 15 Q Did you understand that in the -- the last 16 e-mail, the month prior, in the afternoon Mr. Depp 17 was taking 25 milligrams of Seroquel? 18 A I think that's right. 19 Q Okay. And then in the evening it shows 20 Mr. Depp taking 150 milligrams of Seroquel, 21 correct, right before bedtime -- 22 A Correct.</p>
<p style="text-align: right;">98</p> <p>1 were an increase in Seroquel and Adderall. Do you 2 see that -- 3 A Yes. 4 Q -- at the bottom? 5 A Yes. 6 Q And in the morning it shows Mr. Depp 7 taking 30 milligrams of Adderall, correct? 8 A Correct. 9 Q And we can look back if you need to, but 10 do you understand that that is -- that at 4:00 in 11 the morning he was taking 15 milligrams of 12 Adderall? 13 A That's correct. 14 Q Okay. So that was a doubling of the dose 15 of Adderall that Mr. Depp had in the morning? 16 A Doubling of the morning dose, yes. 17 Q Right. And now it says Afternoon as 18 opposed to Noon. It shows him taking 30 19 milligrams of Adderall, correct? 20 A Correct. 21 Q And at noon in the last document Mr. Depp 22 was taking 15 milligrams of Adderall?</p>	<p style="text-align: right;">100</p> <p>1 Q -- HS? 2 A Uh-hum. 3 Q And do you understand that the last -- the 4 last e-mail had Mr. Depp taking 50 milligrams of 5 Seroquel at bedtime? 6 A I think that's right. 7 Q So this tripled Mr. Depp's dosage, 8 correct, at -- at bedtime? 9 A Bedtime dose is three times -- three times 10 as large, yes. 11 Q Okay. Did you have any discussions with 12 anyone regarding the changes in the medications 13 that Mr. Depp was taking? 14 A Yes. 15 Q Who did you have discussions with? 16 A Dr. Kipper. 17 Q What do you recall about those 18 discussions? 19 MR. PRESIADO: Objection; calls for 20 hearsay. 21 THE WITNESS: Nothing specific. 22 Q Did you share any thoughts on the drug</p>

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1 regimen that Mr. Depp was on with Dr. Kipper?
 2 **A I would have, yes.**
 3 Q And did you say anything about the amounts
 4 of medic- -- either Adderall or Seroquel that
 5 Mr. Depp was taking?
 6 **A Again, I don't recall the conversation,**
 7 **but we would have talked about the medications and**
 8 **the doses; both.**
 9 Q Did you have any concerns about any of the
 10 amounts of medications that Mr. Depp was taking?
 11 **A I had concerns about the Adderall that I**
 12 **would have expressed to him.**
 13 Q And what were the concerns about the
 14 Adderall?
 15 **A I -- again, I don't recall the specific**
 16 **conversations, but I would have been asking about**
 17 **how he was diagnosed to have ADHD or under what**
 18 **circumstances he would take that, especially if he**
 19 **wasn't currently working.**
 20 Q And do you have any understanding as to
 21 why Mr. Depp was prescribed that Adderall and at
 22 those amounts?

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1 **A I don't.**
 2 Q Did Dr. Kipper not answer your questions?
 3 **A Like I said, I don't recall specifically**
 4 **the conversation.**
 5 Q Did you have any conversations with
 6 Mr. Depp about the amount of drugs he was taking,
 7 either the number of different drugs or the amount
 8 of any of the drugs he was taking?
 9 **A I -- again, I don't recall, but I must**
 10 **have, yes.**
 11 Q Why do you say you "must have"?
 12 **A Because in the course of treating**
 13 **somebody, I'm able to discuss with them the**
 14 **medications that they're taking.**
 15 Q Did you have any discussions with Mr. Depp
 16 about concerns you had about the amount of
 17 medication he was taking, either the number of
 18 drugs or the amount of a particular drug?
 19 **A I assume I would have discussed with him**
 20 **Adderall. But, again, I can't recall**
 21 **specifically.**
 22 Q Did -- did Mr. Depp describe to you any

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1 side effects he had from any of the medications?
 2 **A I can't recall. When we get to my notes I**
 3 **may have refreshed recollections, but at this**
 4 **point I can't recall.**
 5 Q Okay.
 6 MR. NADELHAFT: Okay, we can take this
 7 down. And can you put up attachment 8.
 8 AV TECHNICIAN: Stand by.
 9 (Exhibit 6, Chain of e-mails dated
 10 1/12/15, Bates No. BLAUSTEIN0000023, was marked
 11 for identification and is attached to the
 12 transcript.)
 13 AV TECHNICIAN: I'm showing Exhibit 6 on
 14 the screen.
 15 Q Dr. Blaustein, I'm showing you what's been
 16 marked as Blaustein Exhibit 6. Do you see that?
 17 **A Yes.**
 18 Q And do you recognize this document?
 19 **A It looks like a list of medications that**
 20 **the nurse sent to me on January 12, 2015.**
 21 Q Okay. And at the bottom of the e-mail
 22 chain, you wrote, Hi Debbie, Just got your

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1 voicemail. Fortunately, my appointment with him
 2 is for 2:45 today. Hopefully, he'll wake up in
 3 time for that.
 4 Also, please send me a current meds list.
 5 Thanks again, Alan.
 6 You wrote that e-mail to Debbie Lloyd --
 7 **A Yes.**
 8 Q -- on January 12, 2015? Okay.
 9 And where you say -- do you recall the
 10 voicemail you received from Ms. Lloyd?
 11 **A No.**
 12 Q Okay. And your appointment with Mr. Depp
 13 was at 2:45. I assume in the afternoon, correct?
 14 **A Correct.**
 15 Q And Mr. Depp had trouble waking up for a
 16 2:45 appointment?
 17 **A Apparently.**
 18 Q Who -- how -- who scheduled Mr. Depp's
 19 appointments with you?
 20 **A I don't recall. At this point I would say**
 21 **Debbie, but I can't recall specifically.**
 22 Q Okay. Did you ever text with Mr. Depp?

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105	<p>1 MR. PRESIADO: Objection.</p> <p>2 THE WITNESS: I don't think so.</p> <p>3 BY MR. NADELHAFT:</p> <p>4 Q Did you -- did you ever e-mail with</p> <p>5 Mr. Depp?</p> <p>6 A I don't think so, no.</p> <p>7 Q And then on January 12, 2015 at</p> <p>8 11:10 a.m., Debbie Lloyd sent you Mr. Depp's</p> <p>9 current medications he was on as of January 12,</p> <p>10 2015, correct?</p> <p>11 A Correct.</p> <p>12 Q Was there a reason you were asking for</p> <p>13 another list of the medications that Mr. Depp was</p> <p>14 taking as of January 12, 2015?</p> <p>15 A Again, I would like to know the</p> <p>16 medications that my patients are taking.</p> <p>17 Q When Mr. Depp missed appointments with</p> <p>18 you, was it ever explained to you why he had</p> <p>19 missed the appointments?</p> <p>20 A Sometimes Johnny would tell me in a later</p> <p>21 session why he missed the appointment. And I -- I</p> <p>22 assume from the last e-mail you showed me, the</p>	107	<p>1 THE WITNESS: I was aware that he was</p> <p>2 under investigation for something, but I didn't</p> <p>3 know what the -- what the cause of the</p> <p>4 investigation was.</p> <p>5 BY MR. NADELHAFT:</p> <p>6 Q Were you aware that Ozzy Osbourne sued</p> <p>7 Dr. Kipper for overprescribing drugs to him?</p> <p>8 MR. PRESIADO: Same objections.</p> <p>9 THE WITNESS: I know there was an issue</p> <p>10 with Ozzy Osbourne. I didn't know what the</p> <p>11 allegations were.</p> <p>12 Q Were you aware that the state medical</p> <p>13 board moved to revoke Dr. Kipper's license?</p> <p>14 MR. PRESIADO: Same objection.</p> <p>15 THE WITNESS: I know there was a hearing</p> <p>16 before the state medical board, but I wasn't aware</p> <p>17 of any issue of him having his license revoked.</p> <p>18 Q Okay.</p> <p>19 MR. NADELHAFT: You can take this down.</p> <p>20 And can you put up attachment 9, please.</p> <p>21 AV TECHNICIAN: Stand by.</p> <p>22 (Exhibit 7, Chain of e-mails dated 3/1/15,</p>
106	<p>1 medication list, I would hear about it from the</p> <p>2 nurse.</p> <p>3 Q Okay. Do you recall any of the reasons</p> <p>4 why Mr. Depp missed appointments with you?</p> <p>5 A I know he overslept for some of them. I</p> <p>6 can't remember any others.</p> <p>7 Q Okay. And in this list of medications</p> <p>8 Mr. Depp is taking an -- in addition to the 30</p> <p>9 milligrams of Adderall he's taking in the morning</p> <p>10 and at noon, he's taking an additional 30</p> <p>11 milligrams of Adderall in the evening, correct?</p> <p>12 A Yes.</p> <p>13 Q Did you have any discussions with</p> <p>14 Dr. Kipper about increasing even more Mr. Depp's</p> <p>15 use of Adderall?</p> <p>16 A I don't think so.</p> <p>17 Q Okay. Were you ever aware that Dr. Kipper</p> <p>18 was under investigation for overprescribing drugs</p> <p>19 to patients?</p> <p>20 MR. PRESIADO: Objection; assumes facts</p> <p>21 not in evidence, lacks foundation, calls for</p> <p>22 speculation.</p>	108	<p>1 Bates Nos. BLAUSTEIN0001636 and BLAUSTEIN0001637,</p> <p>2 was marked for identification and is attached to</p> <p>3 the transcript.)</p> <p>4 AV TECHNICIAN: Showing Exhibit 7 on the</p> <p>5 screen.</p> <p>6 BY MR. NADELHAFT:</p> <p>7 Q Dr. Blaustein, I'm showing you what's been</p> <p>8 marked as Exhibit 7 to your deposition. This is</p> <p>9 an e-mail chain between you and Dr. Kipper. Do</p> <p>10 you recognize the e-mail?</p> <p>11 A Could you scroll back up. I mean, I</p> <p>12 recognize my name on here and..</p> <p>13 Q Why don't we do it this way: I'll just --</p> <p>14 you know how e-mails would typically -- the first</p> <p>15 e-mail starts at the end, right?</p> <p>16 A Okay. Let's -- go ahead, let's go to the</p> <p>17 end then.</p> <p>18 Q Yup. Okay. I have to get down there.</p> <p>19 On March 1, 2015 you wrote: Hi David.</p> <p>20 Sending you this e-mail to two addresses.</p> <p>21 Want to make sure you're receiving my e-mails</p> <p>22 since I haven't heard back from you. I've been in</p>

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<p style="text-align: right;">109</p> <p>1 touch with Debbie in AUS about J and it doesn't 2 sound like he's doing very well. Thought it might 3 be a good idea to talk and see if there's anything 4 we can do to help. I've offered to speak with 5 him, but so far he hasn't set up anything with me. 6 I last spoke to him in mid-January, so I'm way 7 behind on what's going on with him. 8 Let me know if you'd like to talk about 9 him, and strategize if there's some role I can 10 play in his care. 11 Also, want to make sure you got my note 12 updating you about Betty and thanking you for your 13 care. 14 Did you write this e-mail to Dr. Kipper on 15 March 1, 2015? 16 A Yes. 17 Q Okay. And where you wrote: I've been in 18 touch with Debbie in AUS about J and it doesn't 19 sound like he's doing very well, Debbie is Debbie 20 Lloyd, correct? 21 A I assume so, yes. 22 Q And "AUS" stands for what?</p>	<p style="text-align: right;">111</p> <p>1 A No. 2 Q Do you recall offering to speak to 3 Mr. Depp around March of 2015? 4 A I assume that I did because I see this in 5 the e-mail, but I have no independent 6 recollection. 7 Q Okay. Does Betty have anything to do with 8 Mr. Depp's -- 9 A No. 10 Q -- care? Okay. That's what I thought. 11 And then on March 1st, the same day, 12 Dr. Kipper responded to your e-mail. Do you see 13 that? 14 A Yes. 15 Q Okay. And Dr. Kipper first talks about 16 Betty, and then he says, J is in some trouble and 17 I've been in touch with the camp in Australia and 18 his sister at home. Debbie is worried and 19 somewhat exhausted and he is doing what he wants 20 since his friend Marilyn Manson is there visiting. 21 Is this e-mail -- does this e-mail refresh 22 your recollection at all as to what sort of</p>
<p style="text-align: right;">110</p> <p>1 A Australia. 2 Q And "J" is Mr. Depp, correct? 3 A Uh-hum, correct. 4 Q And what was your under- -- you said, I've 5 been in touch with Debbie in Australia about J and 6 it doesn't sound like he's doing very well. 7 What was your understanding as to what was 8 happening with Mr. Depp? 9 MR. PRESIADO: Objection to the extent it 10 calls for hearsay. 11 THE WITNESS: I don't recall. 12 Q You don't have any recollection as to what 13 was going on with Mr. Depp in Australia as of 14 March 1, 2015? 15 A No. I mean -- no. I know he was there 16 for -- shooting a movie. 17 Q And do you recall -- and do you recall 18 Ms. Lloyd reaching out to you about Mr. Depp? 19 A I do not recall, no. 20 Q So I -- you don't recall whether she 21 reached out to you by phone or by text or by 22 e-mail?</p>	<p style="text-align: right;">112</p> <p>1 trouble Mr. Depp was in in Australia as of 2 March 1, 2015? 3 A No. 4 Q Did you ever talk to Mr. Depp about what 5 he did when Marilyn Manson would visit? 6 A No. 7 Q When you were working with Mr. Depp, did 8 you have any understanding whether Mr. Depp was 9 still abusing drugs and alcohol or not? 10 A Yes. 11 Q You had an understanding that Mr. Depp 12 was -- was still abusing drugs and alcohol? 13 A Well, yes, I had an understanding about 14 whether he was. And I know he had continued to 15 use marijuana, and I -- and I did -- he did 16 struggle with some other breakthrough uses, but I 17 can't -- I can't recall at this time. 18 Q What -- what break -- what drugs were the 19 breakthrough uses that you were referring to? 20 MR. PRESIADO: Objection; calls for 21 speculation. 22 THE WITNESS: No, I can't.</p>

<p style="text-align: right;">113</p> <p>1 BY MR. NADELHAFT: 2 Q You can't remember any of the drugs or 3 alcohol that would be breakthrough uses that you 4 were referring to in your answer? 5 A Correct. 6 Q But you do recall that there were times in 7 your working with Mr. Depp where he had 8 breakthrough uses of drugs or alcohol? 9 A Yeah, that his relative sobriety was not 10 complete, yes. 11 Q And that's what you mean by breakthrough 12 usage, that his sobriety -- Mr. Depp's sobriety 13 was not complete? 14 A Well, relative sobriety. Again, I said 15 "relative sobriety" because he did continue to use 16 marijuana throughout -- almost entirely throughout 17 the time I knew him with a short time exception, I 18 think. So I called it "relative sobriety," then 19 there would be some breakthrough uses of other 20 substances. 21 Q Okay. And when you say breakthrough 22 usage, just so everyone understands, what do you</p>	<p style="text-align: right;">115</p> <p>1 Q Okay. And Dr. Kipper also informed you 2 that he'd asked Ms. Lloyd to increase the 3 Neurontin that Mr. Depp was taking? 4 A I see that there. 5 Q Okay. And you see at the bottom of 6 Dr. Kipper's e-mail he says -- on page 2 of 7 Exhibit 7, he says, When and where I see him I'm 8 going to insist he reestablishes dialogue with 9 you? 10 A I do. 11 Q Do you know if Dr. Kipper had any 12 conversation with Mr. Depp about reestablishing 13 his dialogue with you? 14 A I don't know. 15 Q Okay. And then you responded on March 1st 16 and said, Thanks, David, for the update. Glad the 17 e-mail stuff is working again. 18 Sounds like a difficult time in Australia. 19 I wonder if we shouldn't get Marc Schoen -- 20 S-C-H-O-E-N -- back in the loop. Perhaps he can 21 have him start up the hypotherapy [sic] audio once 22 again. I haven't used metform- -- metformin yet.</p>
<p style="text-align: right;">114</p> <p>1 mean by that? 2 A He's trying to be sober. He's working on 3 sobriety. And by "breakthrough uses," I mean -- 4 sobriety would mean the abstinence of using the 5 substance, and so the breakthrough would be on a 6 particular time he would have used a substance 7 that he was trying to be sober of, abstinent of. 8 Q Okay. So in addition to marijuana, in the 9 time that you saw Mr. Depp from October of 2014 10 through January of 2015, there were other times -- 11 there were times where Mr. Depp broke his sobriety 12 with drugs or alcohol in addition to marijuana, 13 correct? 14 A I believe so, yes. 15 Q And how did you come to that 16 understanding? 17 A He would have told me. 18 Q Okay. And in this e-mail Mr. -- 19 Dr. Kipper informs you that he's added metformin 20 to the list of drugs that he's prescribing to 21 Mr. Depp? 22 A Yes.</p>	<p style="text-align: right;">116</p> <p>1 Looking forward to hearing more about your 2 experience. 3 You wrote this e-mail to Dr. Kipper? 4 A Yes. 5 Q Who -- and who is Marc Schoen? 6 A I -- he's a psychologist/hypnotherapist. 7 And I think you mispronounced 8 hypnotherapy. It's not hypotherapy, it's 9 hypnotherapy. 10 And Marc Schoen is a psychologist and 11 hypnotherapist. 12 Q And what's hypno- -- what did -- what did 13 you understand hypnotherapy audio that Mr. Depp 14 was doing with Mr. Schoen -- or Dr. Schoen? 15 A I think Dr. Schoen created a hypnotherapy 16 audiotape -- or audio file by then, for Johnny to 17 listen to at night to help him with sleep. 18 Q So it was -- was the hypnotherapy 19 your under- -- in your understanding for 20 Mr. Depp's sleep issues? 21 MR. PRESIADO: Objection to the extent it 22 calls for speculation, lacks foundation.</p>

<p style="text-align: right;">117</p> <p>1 THE WITNESS: I think so, yes.</p> <p>2 BY MR. NADELHAFT:</p> <p>3 Q Okay. And you say, I haven't used</p> <p>4 metformin yet. Looking forward to hearing more</p> <p>5 about your experience.</p> <p>6 Did Dr. Kipper tell you at all how</p> <p>7 metformin worked for Mr. Depp?</p> <p>8 A I don't recall.</p> <p>9 Q Okay. Do you know why Mr. Depp stopped</p> <p>10 seeing you?</p> <p>11 A I know he was preparing to leave to</p> <p>12 Australia to go to work and -- I assumed that was</p> <p>13 the reason.</p> <p>14 Q But he hasn't returned to you since he</p> <p>15 went to Australia in -- in 2015, correct?</p> <p>16 A Correct.</p> <p>17 Q And -- and did anyone inform you as to why</p> <p>18 he stopped seeing you?</p> <p>19 A No.</p> <p>20 Q No?</p> <p>21 MR. NADELHAFT: You can take this down.</p> <p>22 Q Did -- did you ever have an understanding</p>	<p style="text-align: right;">119</p> <p>1 remember anything.</p> <p>2 Q And you don't recall how you understood</p> <p>3 Mr. Depp cut his finger?</p> <p>4 A Correct.</p> <p>5 Q Okay.</p> <p>6 MR. NADELHAFT: And can you put up</p> <p>7 attachment 10.</p> <p>8 AV TECHNICIAN: Stand by.</p> <p>9 (Exhibit 8, 3/15/15 letter from</p> <p>10 Dr. Kipper, Bates No. DEPP00001795, was marked for</p> <p>11 identification and is attached to the transcript.)</p> <p>12 AV TECHNICIAN: Showing Exhibit 8 on the</p> <p>13 screen.</p> <p>14 Q Dr. Blaustein, I'm showing you what's been</p> <p>15 marked as Exhibit 8 to your deposition. I just</p> <p>16 want to make sure, did Dr. Kipper ever show you</p> <p>17 this letter he wrote to Mr. Depp?</p> <p>18 A Can I review it for a second?</p> <p>19 Q Sure.</p> <p>20 A I don't recall ever seeing this letter.</p> <p>21 Q Okay. And at the bottom of the letter you</p> <p>22 see how Dr. Kipper writes: I encourage you to at</p>
<p style="text-align: right;">118</p> <p>1 that in March of 2015 Dr. Kipper fired Mr. Depp as</p> <p>2 a client?</p> <p>3 A No.</p> <p>4 Q Okay. Did you ever speak to Dr. Kipper</p> <p>5 about any issues Mr. Depp had in Australia in</p> <p>6 March of 2015?</p> <p>7 A We had a telephone conversation which I</p> <p>8 was reminded of on the billing statement that you</p> <p>9 showed me. So it must have been about that. But</p> <p>10 I don't recall.</p> <p>11 Q And you don't recall anything about the</p> <p>12 conversation you had with Dr. Kipper about</p> <p>13 Mr. Depp in Australia?</p> <p>14 A Correct.</p> <p>15 Q Did you recall ever having a conversation</p> <p>16 with Dr. Kipper about Mr. Depp's finger?</p> <p>17 A Finger?</p> <p>18 Q Finger, yeah.</p> <p>19 A There's -- there's a remote recollection</p> <p>20 of something about a finger, but I don't remember</p> <p>21 specifically. Cutting a finger. It's very fuzzy.</p> <p>22 Something happened with his finger, but I don't</p>	<p style="text-align: right;">120</p> <p>1 least connect with Dr. Blaustein who knows you</p> <p>2 well to help you obtain another resource for you</p> <p>3 to -- for your continued care?</p> <p>4 A I do see that.</p> <p>5 Q Did anyone -- did Mr. Depp or anyone from</p> <p>6 Mr. Depp's team ask you for any referrals for --</p> <p>7 for another psychiatrist?</p> <p>8 A I don't think so, no.</p> <p>9 Q Did any -- did anyone -- Mr. Depp or</p> <p>10 anyone from Mr. Depp's team ask you for referrals</p> <p>11 for any other type of doctor or any other type of</p> <p>12 care for Mr. Depp?</p> <p>13 A I don't recall that they did, no.</p> <p>14 Q Okay.</p> <p>15 MR. NADELHAFT: We can take this down.</p> <p>16 And can we put up attachment 11.</p> <p>17 (Exhibit 9, Dr. Blaustein's notes, Bates</p> <p>18 Nos. BLAUSTEIN00000009 through BLAUSTEIN00000020,</p> <p>19 was marked for identification and is attached to</p> <p>20 the transcript.)</p> <p>21 AV TECHNICIAN: Showing Exhibit 9 on</p> <p>22 screen.</p>

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<p>121</p> <p>1 Q Dr. Blaustein, I'm showing you what's been 2 marked as Exhibit 9 to your deposition. They are 3 12 pages of what look to be your notes. 4 A Uh-hum. 5 Q And we can scroll through it if you'd 6 like. I'm going to ask you particular things 7 about these, but... 8 Do these look like your notes? 9 A They are. 10 Q Okay. And these are your notes of your 11 care with -- of Mr. Depp? 12 A I'm sorry, I didn't hear you. Repeat 13 that. 14 Q These are your notes of your care of 15 Mr. Depp? 16 A These are notes that arose from my care of 17 Mr. Depp, yes. 18 Q Okay. 19 MR. PRESIADO: Can you let me know what 20 the full Bates range is of these -- of this 21 document. 22 MR. NADELHAFT: Sure. It's BLAUSTEIN 9</p>	<p>123</p> <p>1 from this. But I'll be back in five minutes. 2 MR. NADELHAFT: Okay. Great. 3 THE VIDEOGRAPHER: Off the record at 2:57. 4 (Recess was held.) 5 THE VIDEOGRAPHER: Back on the record at 6 3:00. 7 BY MR. NADELHAFT: 8 Q Welcome back, Dr. Blaustein. 9 Blaustein Exhibit 9 are notes reflecting 10 your care of Mr. Depp, correct? 11 A Correct. 12 Q And you kept these notes in the ordinary 13 course of business, correct? 14 A Correct. 15 Q And you kept these notes in a file for 16 Mr. Depp, correct? 17 A Correct. 18 Q And -- and were these notes on white 19 sheets of paper, like they are reflected here on 20 the video? 21 A Some notes would be on white sheets of 22 paper and others would be on lined paper.</p>
<p>122</p> <p>1 through BLAUSTEIN 20. 2 MR. PRESIADO: Thank you. 3 THE WITNESS: Let me just interrupt you 4 for a second and ask about timing. So I see we're 5 getting into a new phase, which is, of course, 6 fine. And here in Los Angeles -- I don't know 7 where you are; it sounded like East Coast -- it's 8 noon. So at some point we're going to break for 9 lunch, I assume. If it's soon, great. But if 10 it's not soon, I want to take a five-minute 11 bathroom break, if I can. So where are we on 12 this, just -- 13 MR. NADELHAFT: Yeah. I mean, I do want 14 to go through these notes with you. Let's take a 15 break. Let's take a -- let's take a break. I 16 mean, if you want lunch now, you're more than 17 welcome to take a lunch now; it's up to you. 18 THE WITNESS: Let me just take a 19 five-minute break, we'll go for a half hour. I'm 20 used to 45-minute chunks -- 21 MR. NADELHAFT: Sure. 22 THE WITNESS: -- so I'm kind of fatigued</p>	<p>124</p> <p>1 Q Okay. Okay. And I gotta admit, I have 2 some trouble reading your handwriting. So can 3 you -- on this first page can you just tell me 4 what it says. 5 A Sure. JD are his initials. And I'll have 6 a date range, October 2nd through 7th, Intro 7 consultation. And, No diagnosis or treatment done 8 on these phone meetings. For introduction 9 purposes only. Did not meet prospective patient 10 in person. Historical data taken on separate 11 sheets. 12 Q Thank you. 13 Okay. And then -- these are your notes 14 from 10/2/14? 15 A Right. These would have been what are 16 called process notes. They are notes that I would 17 have taken on the phone while talking to Johnny. 18 Q Okay. And this is page 1 of those notes 19 from October 2, 2014, correct? 20 A Correct. 21 Q Okay. And the first dash, what does that 22 say?</p>

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<p style="text-align: right;">125</p> <p>1 A Work takes me on the road a lot.</p> <p>2 Q Okay. And what does the second dash say?</p> <p>3 A Looking forward to.</p> <p>4 Q And then there's words that are circled.</p> <p>5 What does that say?</p> <p>6 A Extended period of time.</p> <p>7 Q And that is extended period of time</p> <p>8 referring to that he's -- Mr. Depp's on the road a</p> <p>9 lot for an extended period?</p> <p>10 A My thought on that -- again, it's not a</p> <p>11 specific recollection. But my thought on that is</p> <p>12 he was talking about wanting to be in therapy for</p> <p>13 an extended period of time.</p> <p>14 Q Okay. And under -- there's -- to the</p> <p>15 right on the top it says Johnny, with an</p> <p>16 underline. And what does it say under that?</p> <p>17 A What's worked or what hasn't in therapy</p> <p>18 and past.</p> <p>19 Q Okay. And then under the circle, what</p> <p>20 does it say? It looks like it starts with a C.</p> <p>21 A Yeah. I don't know.</p> <p>22 Q Okay.</p>	<p style="text-align: right;">127</p> <p>1 Q Would it -- would it be from his mom or</p> <p>2 dad?</p> <p>3 MR. PRESIADO: Objection; asked and</p> <p>4 answered.</p> <p>5 THE WITNESS: I can't remember.</p> <p>6 Q Okay. But you recall Mr. Depp discussing</p> <p>7 being abused as a child and adolescent?</p> <p>8 A Yes.</p> <p>9 Q Then it says here -- it says, saved life,</p> <p>10 circled, right?</p> <p>11 A Uh-hum, yes.</p> <p>12 Q Do you know what the "saved life" is</p> <p>13 referring to?</p> <p>14 A I might if I read the material to the</p> <p>15 right of it.</p> <p>16 Q Sure. So what does --</p> <p>17 A I don't know.</p> <p>18 Q What does to the right of it say?</p> <p>19 A A lot of childhood trauma. Fear of going</p> <p>20 to sleep. Something, in relationship. R with a</p> <p>21 circle is relationship. Not letting anyone down.</p> <p>22 Not letting his parents down. Feels everyone --</p>
<p style="text-align: right;">126</p> <p>1 A Again, there will be plenty of places</p> <p>2 where I don't remem- -- I can't read what they</p> <p>3 say. They are for my current retention purposes</p> <p>4 only in these -- in these particular notes.</p> <p>5 Q Okay.</p> <p>6 A And that's what makes them process notes.</p> <p>7 Q Understood. I under- -- just want to -- I</p> <p>8 understand.</p> <p>9 A Uh-hum.</p> <p>10 Q And then the next two words, it looks like</p> <p>11 an M. What are those two words?</p> <p>12 A Uh-hum. Mom's needs, perhaps.</p> <p>13 Q Okay. Did you under- -- in working with</p> <p>14 Mr. Depp, did you understand -- did Mr. Depp</p> <p>15 discuss his childhood with you?</p> <p>16 A Yes.</p> <p>17 Q In working with Mr. Depp, did he discuss</p> <p>18 any abuse he received as a child or adolescent?</p> <p>19 A Yes.</p> <p>20 Q And -- and who did he discuss receiving</p> <p>21 abuse from?</p> <p>22 A I can't remember.</p>	<p style="text-align: right;">128</p> <p>1 feels everyone else's, something, before -- before</p> <p>2 everyone else.</p> <p>3 Q Okay.</p> <p>4 A I think he was talking about he's -- what</p> <p>5 my recollection of that is that he feels other</p> <p>6 people's pain before his own. He feels other</p> <p>7 people's issues before his own. He cares for</p> <p>8 others before he cares for himself.</p> <p>9 Q Okay. And then under saved life, there's</p> <p>10 another word that's below with a box around it.</p> <p>11 What does that say?</p> <p>12 A Oxycodone.</p> <p>13 Q Okay. And then it says oxycodone again.</p> <p>14 A Uh-hum.</p> <p>15 Q What do you recall Mr. Depp talking to you</p> <p>16 about oxycodone?</p> <p>17 A I don't. As we go along maybe it will</p> <p>18 refresh my recollection, but that -- obviously</p> <p>19 that he took the oxycodone.</p> <p>20 Q Okay. Oops. I just went the wrong way.</p> <p>21 Sorry about that.</p> <p>22 And what does it say under oxycodone? It</p>

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<p>1 looks like it starts with a D.</p> <p>2 A Uh-hum. I don't know. Under that is,</p> <p>3 Underlying anxiety issues.</p> <p>4 Q Okay. So Mr. Depp was talking to you</p> <p>5 about underlying anxiety issues he had?</p> <p>6 A Yes.</p> <p>7 Q Okay. And then it says age 12 -- that</p> <p>8 says age 12, correct?</p> <p>9 A Uh-hum, yes.</p> <p>10 Q. And then it says Xanax?</p> <p>11 A Yes.</p> <p>12 Q Did you understand that Mr. Depp was --</p> <p>13 had been taking Xanax since age 12?</p> <p>14 A It's hard to think of that now, but that's</p> <p>15 possible. I don't know. I don't remember.</p> <p>16 Q Okay. And then under Xanax it says low</p> <p>17 blow, right?</p> <p>18 A Yes.</p> <p>19 Q Okay. And can you tell what it says to</p> <p>20 the right of Xanax and low blow?</p> <p>21 A Could you move your cursor, please, or is</p> <p>22 that...</p>	129	<p>1 BLAUSTEIN 20, which is Blaustein Exhibit 9 to this</p> <p>2 deposition, he has the same notes in his hand that</p> <p>3 he's going to be referring to just because it's</p> <p>4 difficult to look at on the computer. But they're</p> <p>5 all still Blaustein-9 as we continue to -- as</p> <p>6 Dr. Blaustein continues to testify about that.</p> <p>7 BY MR. NADELHAFT:</p> <p>8 Q Do you agree with that, Dr. Blaustein?</p> <p>9 A Yes, correct.</p> <p>10 Q Okay.</p> <p>11 A Thank you.</p> <p>12 Q Uh-hum. Okay. Now, we were on the second</p> <p>13 page, BLAUSTEIN 10, and you were talking at the</p> <p>14 bottom it said, Catch-22 - fiancée. And what does</p> <p>15 it say?</p> <p>16 MR. PRESIADO: Where are we on this</p> <p>17 document?</p> <p>18 MR. NADELHAFT: BLAUSTEIN 10, the bottom.</p> <p>19 MR. PRESIADO: No, I understand, but -- I</p> <p>20 don't see where you are referring to.</p> <p>21 THE WITNESS: To the right of Xanax, where</p> <p>22 it says Xanax.</p>	131
<p>1 MR. PRESIADO: It's still there, Adam.</p> <p>2 THE WITNESS: I guess it's not your</p> <p>3 cursor.</p> <p>4 MR. NADELHAFT: It moved for me.</p> <p>5 THE WITNESS: Here it is. I can read that</p> <p>6 part. It's okay. I got it now.</p> <p>7 Catch-22 - fiancée. Against self.</p> <p>8 It seems to me like it would help me to</p> <p>9 look at my own notes instead of on the computer</p> <p>10 screen.</p> <p>11 Q Okay. Why don't we --</p> <p>12 MR. NADELHAFT: Why don't we do this: Can</p> <p>13 we -- let's go off the record for one -- for a</p> <p>14 moment.</p> <p>15 MR. PRESIADO: That's fine.</p> <p>16 THE VIDEOGRAPHER: Off the record at 3:10.</p> <p>17 (Discussion held off the record.)</p> <p>18 THE VIDEOGRAPHER: Back on the record at</p> <p>19 3:14.</p> <p>20 MR. NADELHAFT: Back on the record.</p> <p>21 Off the record Dr. Blaustein and I</p> <p>22 discussed that he has -- that BLAUSTEIN 9 through</p>	130	<p>1 MR. PRESIADO: Okay.</p> <p>2 MR. NADELHAFT: And I under- -- I</p> <p>3 understood Dr. Blaustein before to be referring to</p> <p>4 it saying Catch-22.</p> <p>5 BY MR. NADELHAFT:</p> <p>6 Q Is that what you think it says?</p> <p>7 A Correct, Catch-22 - fiancée. Against</p> <p>8 self-destructive behavior. Did not, something, to</p> <p>9 get -- don't know.</p> <p>10 Should I continue?</p> <p>11 Q Well, what do you -- what did you</p> <p>12 understand that to be referring to, what you just</p> <p>13 read?</p> <p>14 A That's talking about issues with his</p> <p>15 fiancée, the Catch-22 of difficulties in the</p> <p>16 relationship and -- and wanting to be with her;</p> <p>17 both.</p> <p>18 Q And do you recall any difficulties that</p> <p>19 Mr. Depp was talking to you about in his</p> <p>20 relationship with his fiancée?</p> <p>21 A No, not from this.</p> <p>22 Q All right. You can continue. What</p>	132

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<p style="text-align: right;">133</p> <p>1 does -- what does it say --</p> <p>2 A Such a pain in the ass.</p> <p>3 Q Okay. So when it says, Such a pain in the</p> <p>4 ass, is he referring to Amber?</p> <p>5 A I would think so, yes.</p> <p>6 Q Okay. Do you recall why he was saying</p> <p>7 Amber was a pain in the ass?</p> <p>8 A No.</p> <p>9 Q Okay. And what's the next thing say?</p> <p>10 A Well, in boxes, about his kids' mom.</p> <p>11 Q Okay.</p> <p>12 A And, again, I think I have the word</p> <p>13 destructive.</p> <p>14 Q And what was de- -- what was destructive</p> <p>15 referring to, do you know?</p> <p>16 A I don't know. No, I don't.</p> <p>17 Something, relationship 14 to 15 years -</p> <p>18 mother of my kids. Out of that official -</p> <p>19 officially. He didn't want to be his dad.</p> <p>20 Thinking I'm not - abandoning like his dad.</p> <p>21 Q Okay.</p> <p>22 A And then below Kids, it says clear,</p>	<p style="text-align: right;">135</p> <p>1 take control and just put it to page 3, please.</p> <p>2 I'm having some issue with the screen.</p> <p>3 Thank you.</p> <p>4 THE WITNESS: Okay. That's the same page</p> <p>5 I have.</p> <p>6 BY MR. NADELHAFT:</p> <p>7 Q What's the -- what's the first line say?</p> <p>8 A Somebody, comes at you.</p> <p>9 Q Okay.</p> <p>10 A Continue?</p> <p>11 Q And do you know what it -- it says</p> <p>12 somebody comes at you or is it saying a name?</p> <p>13 A I don't know what the first word is. I</p> <p>14 don't know if it's a noun or a proper noun.</p> <p>15 Q Okay. Do you recall Mr. Depp talking</p> <p>16 about anyone coming at him?</p> <p>17 A No.</p> <p>18 Q Okay. And then what's the next line say?</p> <p>19 A There is this violence/rage that we had</p> <p>20 over a couple years.</p> <p>21 Q Okay. And so what is Mr. Depp referring</p> <p>22 to there?</p>
<p style="text-align: right;">134</p> <p>1 better. She needed me to be all this - needed me</p> <p>2 to be all this week or - all this work. I don't</p> <p>3 know.</p> <p>4 Q Okay. Do you recall if Mr. Depp was</p> <p>5 saying that his kids' mom needed him to be better</p> <p>6 when they were together versus now when he's no</p> <p>7 longer with her?</p> <p>8 MR. PRESIADO: Objection; calls for</p> <p>9 speculation.</p> <p>10 THE WITNESS: I don't recall that.</p> <p>11 Q Okay. If we turn to the next page, it</p> <p>12 says page 2.</p> <p>13 A Yup. Got it.</p> <p>14 Q Okay. What does the top -- what does the</p> <p>15 top say?</p> <p>16 A You want to put that up -</p> <p>17 Q Oh, sure.</p> <p>18 A - on the screen so we can confirm that</p> <p>19 it's the same.</p> <p>20 Q Yeah.</p> <p>21 Why is this going so fast? I'm sorry.</p> <p>22 MR. NADELHAFT: Actually, can -- can you</p>	<p style="text-align: right;">136</p> <p>1 A I don't -</p> <p>2 MR. PRESIADO: Objection --</p> <p>3 THE WITNESS: -- recall.</p> <p>4 MR. PRESIADO: -- calls for speculation.</p> <p>5 Q Do you understand Mr. Depp to be referring</p> <p>6 to his relationship with Amber?</p> <p>7 A I don't know if this is his relationship</p> <p>8 with Amber or a prior relationship or maybe not</p> <p>9 even a relationship.</p> <p>10 Q Okay. And then what does it say under</p> <p>11 that?</p> <p>12 A Soup bowl.</p> <p>13 Q Do you know what soup bowl is referring</p> <p>14 to?</p> <p>15 A No. It's a metaphor of some kind. I</p> <p>16 can't recall.</p> <p>17 Q Okay. And what does it say under that?</p> <p>18 A I can just see the last two words.</p> <p>19 That's, at files, but it doesn't make sense to me.</p> <p>20 Q So do you recall that, in working with</p> <p>21 Mr. Depp, that he spoke about violence and rage in</p> <p>22 other relationships in addition to his</p>

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<p style="text-align: right;">137</p> <p>1 relationship with Amber?</p> <p>2 A Well, rage and chaos. I don't remember</p> <p>3 violence, but I do remember rage and chaos. And,</p> <p>4 again, in the context of this is, is I had met him</p> <p>5 at this point. This is an initial telephone</p> <p>6 con- - consultation, so - to see whether or not</p> <p>7 he was going to start therapy with me.</p> <p>8 Q But in your working with Mr. Depp, was he</p> <p>9 talking about rage and chaos with relationships in</p> <p>10 addition to his relationship with Amber? Correct?</p> <p>11 A Yes, yes.</p> <p>12 Q What -- what other relationships was he</p> <p>13 talking about rage and chaos?</p> <p>14 A Again, I don't have the specific</p> <p>15 recollection, but I think it included his -- the</p> <p>16 mother of his children and arguments about -- not</p> <p>17 child custody; childcare or visitation or access</p> <p>18 to the children.</p> <p>19 Q Any -- any other relationships?</p> <p>20 A Not that -- well, in childhood, you know,</p> <p>21 between his parents, with his parents. Again,</p> <p>22 very fuzzy recollection.</p>	<p style="text-align: right;">139</p> <p>1 constant. Dad, something, maybe separated at 15.</p> <p>2 Out of school.</p> <p>3 Q Then what does it say?</p> <p>4 A Man of -- man of family. Sister two --</p> <p>5 two and a half to three years apart. Older</p> <p>6 brother, older sister. Different biological</p> <p>7 fathers. Very closest, maybe. Nuts, he said.</p> <p>8 Q He's referring to who when he says "nuts,"</p> <p>9 as you understand your notes?</p> <p>10 MR. PRESIADO: Objection; calls for</p> <p>11 speculation.</p> <p>12 THE WITNESS: Well, I -- right now I would</p> <p>13 guess it's the -- the chaos of having the</p> <p>14 different biological fathers for the different</p> <p>15 children --</p> <p>16 Q Okay.</p> <p>17 A -- what it was -- what it was like at</p> <p>18 home.</p> <p>19 Q Okay.</p> <p>20 A Brother was wreaking havoc.</p> <p>21 And then, ties half-brother - tie us to --</p> <p>22 I can't read that word.</p>
<p style="text-align: right;">138</p> <p>1 Q All right. And then under that I think it</p> <p>2 says very -- very codependent.</p> <p>3 A Very codependent relationship.</p> <p>4 Passionate. All or nothing. Chaos.</p> <p>5 Q And -- and do you understand what -- what</p> <p>6 relationship Mr. Depp is talking about there?</p> <p>7 A No.</p> <p>8 Q Okay. So that could have been with his --</p> <p>9 his ex-wife, the mother of his children?</p> <p>10 A Could have been.</p> <p>11 Q Okay.</p> <p>12 A Could have been, uh-hum.</p> <p>13 Q Then what does it say?</p> <p>14 A Maybe on some level a little.</p> <p>15 Q Okay. And then it says ex- -- what does</p> <p>16 it then say?</p> <p>17 A Earliest memories, always violence.</p> <p>18 Mother was a volatile bum -- a bomb.</p> <p>19 Q You can keep going.</p> <p>20 A Off -- went off often. Mother never had a</p> <p>21 sober -- sober day. Nerve pills. Too weak to</p> <p>22 break cycle. Not ill feelings. Kind of abuse -</p>	<p style="text-align: right;">140</p> <p>1 If I go to the right side of that line --</p> <p>2 Q Uh-hum.</p> <p>3 A -- mother's verbal abuse - critical. Wall</p> <p>4 eye. Born with a bum left eye, I imagine. Eye</p> <p>5 wanders.</p> <p>6 Awakes at 3:00 a.m. Something, into</p> <p>7 living room. Foundation. 7 to 8, middle of the</p> <p>8 night. First day of school. Abandoned to school.</p> <p>9 Sibling. Almost -- almost -- I can't read the</p> <p>10 next two words. Maybe devil into, something, to</p> <p>11 get morning.</p> <p>12 Q Okay.</p> <p>13 A On the left it says, Raise two kids, 15</p> <p>14 and 12.</p> <p>15 And then below that, She tried to protect</p> <p>16 me -- she tried to protect me, too.</p> <p>17 Q Do you know what that's referring to?</p> <p>18 A My association now is his sister, but I</p> <p>19 don't -- I don't think it's true. I don't have a</p> <p>20 specific recollection, no.</p> <p>21 Wouldn't take fear. Wake up to fight</p> <p>22 devil -- wait -- wait up to fight devil.</p>

<p style="text-align: right;">141</p> <p>1 Q Do you know what that's referring to, wait 2 up to fight devil? 3 A I think he referred to a devil as some 4 version of internal depression and chaos that he 5 felt. Something like an everyday phenomenon he 6 felt he was struggling. And he was -- I think the 7 label on it was devil. 8 Q So Mr. Depp labeled -- labeled something 9 he -- that was internal to him as the devil? 10 MR. PRESIADO: Objection; misstates 11 testimony. 12 THE WITNESS: As -- as a representation of 13 something horrible inside of himself, is what I 14 would say. 15 Q Okay. So the devil was something horrible 16 inside of himself, correct, that's what 17 Mr. Depp -- 18 A I -- again, I don't think he ever said 19 that, so I'm going to be careful here. 20 The devil was the representation of the 21 battle that he had many days when he woke up with 22 depression and anxiety and fears that he had.</p>	<p style="text-align: right;">143</p> <p>1 Q Okay. Now I'm turning to BLAUSTEIN 12, 2 which is page 4 of this exhibit. And there's a 3 3 at the top, correct? 4 A Yeah. You want to put that up on the 5 screen, too? 6 Q Yup, it should be there. 7 A Yup, there it is. Good. 8 Q Okay. And what do you have circled -- or 9 squared? 10 A Mom's father. 11 Q Okay. And then what's -- what does it say 12 next? 13 A Ever since. 14 Q Do you know what that's referring to, 15 Mom's father - ever since? 16 A No. 17 Q Okay. And then what does it say? It 18 looks like it starts with job. 19 A Uh-hum. Job pays, something, at a time. 20 30 years taking care of family. Mom, sister, 21 Deborah, and the family, older brother. 22 Nighttime - circus -- circus keels -- kids</p>
<p style="text-align: right;">142</p> <p>1 Q Did Mr. Depp ever refer to anything as 2 a -- himself as a monster? 3 A I remember the word "monster" in my 4 office, but I don't know if he was referring to 5 himself or not. Maybe that will be more revealed 6 as we go forward. 7 Q Okay. 8 A All right. 9 Q Yup. What's the -- 10 A So, beat me with -- yeah, it's beat me 11 with a pump or with ashtrays. 12 Q Okay. 13 A Tough little fucker. Tough little fucker, 14 I think became a tough little fucker. Dad beat 15 him with a belt. Gave a, something, too. 16 Q Okay. 17 A Help him. Tough elsewhere. 18 Q Okay. Is there a reason why 19 "elsewhere" -- do you recall why you circled 20 "elsewhere"? 21 A No. It's kinda highlighting things in my 22 thoughts as I'm going along.</p>	<p style="text-align: right;">144</p> <p>1 in. Circus kids in. Falls asleep on the couch. 2 Couch to bed. TV on. Sleeping sitting up on the 3 chair. 4 Q Okay. And then to the left, starting 5 with -- to the left there, with the line under it. 6 A Uh-hum. Never note an excuse. 7 Q Okay. 8 A Admirable with her. 9 Q Do you know what those notes are referring 10 to? 11 A No. 12 Q Okay. And then to the right there's, 13 like, two words there. It looks like one starts 14 with an E. 15 A Yeah; emotion. And then below that it's, 16 PB in the 40s, which, I assume, means 17 phenobarbital, but I have no recollection of that. 18 Q So do you understand that Mr. Depp at some 19 point was taking phenobarbital? 20 A If -- if my interpretation of my writing 21 here is correct, that would be sometime in his 40s 22 that he had taken phenobarbital.</p>

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<p>145</p> <p>1 Q Okay. All right. And then to the left it</p> <p>2 looks like it starts -- the word starts with an S.</p> <p>3 A Uh-hum.</p> <p>4 Q Do you know what it says there?</p> <p>5 A I'm trying.</p> <p>6 Q Yeah.</p> <p>7 A Yeah. Starting with dementia. That</p> <p>8 doesn't ring... Fury, maybe. And then, family</p> <p>9 does not give a shit, maybe, or somebody does not</p> <p>10 give a shit. And then, admire.</p> <p>11 Q Do you recall when Mr. Depp would talk</p> <p>12 about fury who he was referring to?</p> <p>13 A No. I'm not even sure that that's the</p> <p>14 word. But I -- I don't recall, no.</p> <p>15 Q Okay.</p> <p>16 A No.</p> <p>17 Q And then to the right it says -- that says</p> <p>18 Amber fiancée, correct?</p> <p>19 A Correct.</p> <p>20 Q And then there's --</p> <p>21 A Work through anger, just below that.</p> <p>22 Q And where it's saying "work through</p>	<p>147</p> <p>1 A Christi and me, his sister.</p> <p>2 Q Okay. Uh-hum.</p> <p>3 A Line fix chow. I think that's</p> <p>4 something -- probably an early recollection about</p> <p>5 food.</p> <p>6 Q Okay.</p> <p>7 A At the end of the line they were the</p> <p>8 strong ones. Couldn't take it. Couldn't take,</p> <p>9 something.</p> <p>10 Q Okay.</p> <p>11 A Going back to the left, Better with girl</p> <p>12 about it. Self-destructive. Hard to not put in</p> <p>13 front of me.</p> <p>14 Q Do you know what self-destructive, hard</p> <p>15 not to put in front of me means -- is referring</p> <p>16 to?</p> <p>17 A I think the self-destructive was his drug</p> <p>18 use. I think that's what he's referring to at</p> <p>19 this time.</p> <p>20 Q Okay.</p> <p>21 A But -- yeah.</p> <p>22 Q And then what's the last line or two there</p>
<p>146</p> <p>1 anger," is that referring to his anger towards</p> <p>2 Amber?</p> <p>3 A I think what he was saying about this,</p> <p>4 that part of his goal of therapy was to work</p> <p>5 through anger that he and his fiancée had towards</p> <p>6 each other.</p> <p>7 Q Okay. Okay. And then to the left -- to</p> <p>8 the left it says, glad -- I think it starts with,</p> <p>9 Glad I --</p> <p>10 A Glad I -- I would have said, Glad I</p> <p>11 keeled, but maybe, Glad I kicked, which would be</p> <p>12 stopping using a particular drug, if that's what</p> <p>13 it says.</p> <p>14 Then birth defect. And another word after</p> <p>15 that. I don't know who that's referring to.</p> <p>16 Accept. Holy shit.</p> <p>17 Q Do you recall what -- the birth defect</p> <p>18 Mr. Depp was referring to?</p> <p>19 A No, no.</p> <p>20 Q Okay. And then, I guess, starting at the</p> <p>21 right with something underlined, it says,</p> <p>22 something, and me?</p>	<p>148</p> <p>1 say?</p> <p>2 A Able to -- glasses of whiskey, scotch. I</p> <p>3 don't know that middle few words. Glasses of</p> <p>4 whiskey, scotch. Father worked, something.</p> <p>5 Grandfather brash.</p> <p>6 Q Okay.</p> <p>7 THE REPORTER: What was that word? I'm</p> <p>8 sorry, what was that word?</p> <p>9 THE WITNESS: Brash.</p> <p>10 THE REPORTER: Brash. Okay.</p> <p>11 THE WITNESS: That's what I said. I don't</p> <p>12 know if that's the word.</p> <p>13 But --</p> <p>14 Q Go ahead.</p> <p>15 Okay. Turning to BLAUSTEIN 13, which</p> <p>16 should have a page 4 at the -- and we can move</p> <p>17 it --</p> <p>18 A Well, now would be -- now would be a good</p> <p>19 time for me to take a --</p> <p>20 Q You want lunch?</p> <p>21 A -- a lunch break, yeah.</p> <p>22 Q Okay. Okay. That's fine.</p>

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149	<p>1 A And a break, generally. So come back at</p> <p>2 20 after? 40 minutes okay?</p> <p>3 Q That -- that's fine with me, as long as it</p> <p>4 works with everybody else.</p> <p>5 MR. NADELHAFT: We can go off the record</p> <p>6 for this.</p> <p>7 THE VIDEOGRAPHER: Off the record at 3:38.</p> <p>8 (Recess was held.)</p> <p>9 THE VIDEOGRAPHER: Back on the record at</p> <p>10 4:20.</p> <p>11 BY MR. NADELHAFT:</p> <p>12 Q Welcome back, Dr. Blaustein.</p> <p>13 Looking at, again, Blaustein Exhibit 9,</p> <p>14 which is BLAUSTEIN 9 through 20, your notes, I'm</p> <p>15 now looking at BLAUSTEIN 13, page -- which has a</p> <p>16 page 4. Are you there?</p> <p>17 A Yes, I am.</p> <p>18 Q Okay. And at the top it says Johnny/</p> <p>19 Debbie, correct?</p> <p>20 A Correct.</p> <p>21 Q And then the date it says 10 slash what?</p> <p>22 A I think that's 10/7.</p>	151	<p>1 Q Okay.</p> <p>2 A Yeah, I don't know what that next word is.</p> <p>3 Q Okay.</p> <p>4 A And then after that is, finished -</p> <p>5 tomorrow.</p> <p>6 Q Okay.</p> <p>7 A Next week. Additional, maybe London. I</p> <p>8 don't know.</p> <p>9 Q Okay. Mr. Depp was in -- was coming --</p> <p>10 had come back from London when you were first</p> <p>11 meeting him, correct?</p> <p>12 A Well, at this time I was still on the</p> <p>13 phone, so I don't know where he was.</p> <p>14 Q Right. Okay. Fair.</p> <p>15 And then -- and then after that?</p> <p>16 A Brain goes through many emotions today.</p> <p>17 Working - everything disappears. My own self</p> <p>18 disappears.</p> <p>19 Q Okay.</p> <p>20 A Playing a character. Something, face.</p> <p>21 Free as a character. Weirdly more comfortable.</p> <p>22 Q So here Mr. Depp was talking about being</p>
150	<p>1 Q Okay, 10/7.</p> <p>2 A Uh-hum.</p> <p>3 Q All right. And to the right -- the words</p> <p>4 to the right, which, I think, starts with self --</p> <p>5 well, starts with self. What are those words?</p> <p>6 A Self-destructive, rage, violence,</p> <p>7 something mind, fears.</p> <p>8 Q And -- and were those words that Mr. Depp</p> <p>9 used?</p> <p>10 A I think those were -- I don't recall. But</p> <p>11 I think that those were things that I was going to</p> <p>12 ask him about in the next phone call.</p> <p>13 Q Okay. And those -- and the</p> <p>14 self-destructive and rage and -- what was the</p> <p>15 third word; violence?</p> <p>16 A Violence, something, mind.</p> <p>17 Q Okay. And -- and were those about</p> <p>18 Mr. Depp?</p> <p>19 A To ask him about, I think, yes.</p> <p>20 Q Okay. And then to the left under the date</p> <p>21 it says, Okay, ugly?</p> <p>22 A No.</p>	152	<p>1 more comfortable acting as a character than as</p> <p>2 himself?</p> <p>3 MR. PRESIADO: Objection --</p> <p>4 THE WITNESS: I think so.</p> <p>5 MR. PRESIADO: -- calls for speculation.</p> <p>6 Q What was your answer?</p> <p>7 A I -- I think so, yeah.</p> <p>8 Q And then next?</p> <p>9 A Abruptness.</p> <p>10 Q Uh-hum.</p> <p>11 A A hundred percent committed. A hundred</p> <p>12 percent some- -- something. And then, things</p> <p>13 happen.</p> <p>14 Q Okay. Then it says what? Next...</p> <p>15 A Next is, don't have ill feelings towards</p> <p>16 anyone. Dad bores me. No ill feelings. Think</p> <p>17 it's fine. They didn't know better.</p> <p>18 Q Okay. So that's talking about -- those</p> <p>19 comments we just read were talking about</p> <p>20 Mr. Depp's family, like, his dad, correct?</p> <p>21 A His -- I think his parents -- his feelings</p> <p>22 about his parents in that present time.</p>

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<p>1 Q Okay. And -- and what's it say next? 2 A Uh-hum. 3 Looks like, fear kids out at a party. 4 Horrible feel -- horrible fear that comes to you 5 as a parent. Don't believe in, something, fear. 6 Conscious fear, perhaps. And I doubt that that -- 7 that doesn't make sense. Didn't believe in it. 8 Repressed Jews. 9 Q And do you know what that's referring to? 10 A Let me see. I don't -- again, not a 11 specific recollection, but I think he may be 12 talking here something about his parent, about 13 some anti-Semitism. That's -- that's not a clear 14 enough recollection to say with any kind of 15 certainty. 16 Q Okay. 17 A Harbor a lot more guilt. Stuck up for 18 myself. 19 Q Okay. 20 A Repression vs. suppression. Rejected from 21 such a young age. 22 Q Do you know what that's referring to,</p>	153	<p>1 must have been, yes, as a child, or adolescent. 2 Q If we turn to the next page, which, for 3 me, is BLAUSTEIN 14, and it says JD, 10/21/14. 4 A Okay. That's a different page. Hold on. 5 Let me grab that. 6 Okay. 7 Q Okay. And so it says JD, 10/21/14, 8 correct? 9 A Correct. 10 Q And then it -- what does it say there? A 11 lot of things? 12 A A lot of things. Work. Intense work. 13 Fatigue. Need a minute. Here I can say with 14 certainty his words, shit with my girl. 15 Q And what's that referring to? 16 MR. PRESIADO: Objection to the extent it 17 calls for speculation. 18 THE WITNESS: Difficulties he was having 19 with Amber. 20 Q And do you recall what he was talking 21 about, what difficulty he was having with -- 22 Mr. Depp was having with Amber?</p>	155
<p>1 rejected from such a young age? 2 A Something he must have been feeling as a 3 child. 4 Q Okay. 5 A He -- cutter - sharp knife as a kid. 2 6 forearms and cigarette in them. By junior in high 7 school I knew I wasn't going to be the prize 8 student. 9 Q So where it says cutter - sharp knife as a 10 kid, did Mr. Depp talk to you about -- that he 11 would cut himself? 12 MR. PRESIADO: Objection; calls for 13 speculation, assumes facts not in evidence. 14 THE WITNESS: I believe so, yes. 15 Q And where it says 2 forearms and 16 cigarette -- what does that say again? 17 A 2 cigarettes in them -- oh, no. 2 forearm 18 and cigarette in them. I assume that meant that's 19 where he would cut himself and burn himself. 20 Q So Mr. Depp talked to you about burning 21 himself with a cigarette? 22 A Again, not a specific recollection, but</p>	154	<p>1 A No. 2 Q Okay. The next line looks like it says 3 she refuses to accept. 4 A Correct. 5 Q Do you know what Amber refuses to accept, 6 what Mr. Depp was referring to? 7 A Nope. 8 Q Okay. And to the right it says Amber, 9 what? 10 A Amber wedding. 11 Q Okay. So you were -- were you talking at 12 this point potentially Mr. Depp and Amber 13 marrying? 14 A Yes. He was talking about that, yes. 15 Q Okay. And then what does it say under, 16 she refuses to accept? 17 A Wedding February. 18 Q And then what's next? 19 A Not want to go to marriage. 51 years old. 20 Q Were there any discussions that you had 21 with Mr. Depp where he had concerns about the age 22 difference between him and Amber?</p>	156

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157	<p>1 A I don't think so, no.</p> <p>2 Q Okay. What does it say under 51 years</p> <p>3 old?</p> <p>4 A A lot of life experiences. You're being</p> <p>5 my mother and psychotic sister.</p> <p>6 Q What -- what did you understand Mr. Depp</p> <p>7 was referring to where you wrote, you're being my</p> <p>8 mother and psychotic sister?</p> <p>9 A I think that's something that he said</p> <p>10 to -- he told me he said to her, that she was --</p> <p>11 Q That Mr. Depp said to Amber, you're being</p> <p>12 my mother and psychotic sister?</p> <p>13 A That's what I would think, yes.</p> <p>14 Q Okay. Then the next line?</p> <p>15 A Okay.</p> <p>16 High tolerance for marijuana.</p> <p>17 Q Uh-hum. Who has a high tolerance for</p> <p>18 marijuana?</p> <p>19 A He did.</p> <p>20 Q Okay.</p> <p>21 A And, she hit me -- she hit me. Show hurt.</p> <p>22 Q Do you know what that's referring to?</p>	159	<p>1 at all how Ms. -- how Amber responded to that</p> <p>2 comment?</p> <p>3 A No.</p> <p>4 Q All right. Turning to the next page,</p> <p>5 which is BLAUSTEIN 15, and where -- I have No. 5</p> <p>6 on the top there.</p> <p>7 A Uh-hum. Okay. I got it. Does it line</p> <p>8 up?</p> <p>9 Q Okay.</p> <p>10 A It's the same.</p> <p>11 Q And --</p> <p>12 A Yup, it's the same.</p> <p>13 Q Okay. And -- and what is the -- self,</p> <p>14 something?</p> <p>15 A Self-destructive very early.</p> <p>16 Q And was Mr. Depp talking about himself</p> <p>17 being self-destructive very early?</p> <p>18 A Yes.</p> <p>19 Q Okay. How was he being -- how was</p> <p>20 Mr. Depp describing that he was self-destructive?</p> <p>21 A I think -- again, I don't recall, but</p> <p>22 let's continue and maybe something's there.</p>
158	<p>1 A He must have told me at some point that</p> <p>2 Amber had hit him. And show hurt was probably</p> <p>3 something I was encouraging him to do in response</p> <p>4 to that, to let her know that that hurts him, to</p> <p>5 show vulnerability to her. Because I --</p> <p>6 underneath his anger about things was a lot of</p> <p>7 hurt. So show her the hurt.</p> <p>8 Q Did -- did he -- did Mr. Depp say at all</p> <p>9 where he was hit?</p> <p>10 A I don't recall.</p> <p>11 Q Do you -- do you know one way or the other</p> <p>12 whether Amber hit Mr. Depp after he had hit her?</p> <p>13 A He did not tell me that he hit her.</p> <p>14 Q Okay. Do you -- did you ever see any</p> <p>15 bruises or cuts on Mr. Depp when he came to your</p> <p>16 office?</p> <p>17 A I don't recall.</p> <p>18 Q Okay. When Mr. Depp told Amber, you're</p> <p>19 being my mother and psycho sister, do you recall</p> <p>20 in what context he was telling her that?</p> <p>21 A No.</p> <p>22 Q Do you recall if he -- Mr. Depp explained</p>	160	<p>1 Q Okay.</p> <p>2 A 9/2/11, stealing sometimes from -- I think</p> <p>3 that's mom.</p> <p>4 Q Okay.</p> <p>5 A 11 to 12 - pills early.</p> <p>6 Q So Mr. Depp was describing that he had</p> <p>7 been taking pills starting at 11 to 12?</p> <p>8 A Uh-hum, yes.</p> <p>9 Q Yeah. Okay. Do you know what pills?</p> <p>10 A I don't remember, no.</p> <p>11 Q Okay. And what's it say next?</p> <p>12 A By the time I was in my teens not a small,</p> <p>13 something, something hurt me. I had been</p> <p>14 through...</p> <p>15 Q I had been through...</p> <p>16 A A soul -- yeah, there it is. Not a soul,</p> <p>17 something, couldn't hurt me.</p> <p>18 Q Okay.</p> <p>19 A He was developing his -- he was developing</p> <p>20 a protection against all of this.</p> <p>21 I had been through the, something.</p> <p>22 Q Okay.</p>

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1 **A Every day – every day was fight or**
2 **flight.**
3 Q Okay. And now Mr. Depp's talking about
4 when he was at a young age, correct?
5 **A Correct.**
6 Q All right. And then it says -- what's the
7 boxed word say?
8 **A Sublimation when acting.**
9 Q Okay. So what did that -- what did you
10 understand that to mean?
11 **A It was something I would have said.**
12 **Sublimation is a – is a – we may have worked**
13 **through some of the traumas that he experienced.**
14 Q Okay. And then -- and then you -- and
15 then you wrote, Debbie, what?
16 **A Debbie not going to use booze tonight.**
17 **Fuck with marijuana. Pills - forget it. Need me.**
18 Q Do you know what those notes are referring
19 to?
20 **A I think he was – the first few were**
21 **his – articulating his commitment to aim for**
22 **sobriety except for marijuana.**

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1 Q So he was trying to -- he was trying to be
2 sober from booze and pills, correct?
3 **A Correct.**
4 Q Okay. And then was it you who said
5 "reward"?
6 **A Yeah. Asking him about where – where can**
7 **he get rewards elsewhere –**
8 Q And --
9 **A – or where did he get reward – I maybe**
10 **asked where did he get rewards elsewhere. And**
11 **there he said in the past MDMA, ecstasy, cocaine.**
12 Q So what did you understand where you wrote
13 MDMA, ecstasy, cocaine?
14 **A I am not quite sure, but those are things**
15 **that he had used in the past. There is another**
16 **possibility that I had asked him specifically**
17 **about that, but I don't think so. It's more**
18 **likely that those were things he had used in the**
19 **past.**
20 Q Do you know what pills Mr. Depp was
21 referring to to be sober from?
22 **A I know oxycodone was a main thrust at that**

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1 **time.**
2 Q And then it says -- back to the left it
3 says left off?
4 **A Yeah. And that's probably a note to**
5 **myself to try to get back to. Left off a reward**
6 **loop mechanism. And it's parallel to a**
7 **relationship. What kinds of rewards could come**
8 **back to him that could be healthy. What kinds of**
9 **rewards that could come from the relationship that**
10 **could be healthy. And then, talk about biology**
11 **changes. So I made a note to myself there to talk**
12 **about how the brain changes in the face of many of**
13 **these drugs over time.**
14 Q Did you talk with Mr. Depp at all that his
15 brain could change as -- if he continues to take
16 these medications -- these drugs?
17 **A Yes, I did. I don't know to what degree,**
18 **but I – I did.**
19 Q And -- and in what ways did you tell
20 Mr. Depp that his brain could change?
21 MR. PRESIADO: Objection; calls for
22 speculation based on his last answer.

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1 THE WITNESS: I don't have a specific
2 recollection, but I -- I would have told him that
3 likely something related to mild or moderate use,
4 you know, that -- that moderation wasn't going to
5 be an option for him on some of these drugs for
6 biological reasons.
7 Q Did you talk to Mr. Depp that the drugs
8 could affect his memory at all?
9 **A I don't recall.**
10 Q Could the drugs affect his memory?
11 MR. PRESIADO: Objection to the extent it
12 calls for an expert opinion.
13 Q Could the drugs -- could the drugs affect
14 his memory?
15 MR. PRESIADO: Objection to the extent it
16 calls for an expert opinion.
17 THE WITNESS: Well, that's what I was just
18 going to say.
19 Q Okay. Next line it says 10/21/14. And
20 then it says additional phone call?
21 **A Uh-hum.**
22 Q Okay. And what does --

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1 **A To discuss -- to discuss relationships --**
 2 **to discuss relationship instability and**
 3 **relationship.**
 4 Q And what does it say next?
 5 **A At the -- I'm reading it. I'm there.**
 6 **How to talk about feelings rather than**
 7 **use. Issues surrounding marriage and marriage**
 8 **date.**
 9 **Work interfering with plans.**
 10 **Girlfriend's "instability" -- if I put it**
 11 **in quotes he said it -- and rage.**
 12 **He says he's not using for her.**
 13 Q Okay. So do you recall anything that
 14 Mr. Depp told you about Amber's instability?
 15 **A I'm trying to remember. Generally, we**
 16 **talked about raised voices, yelling, maybe**
 17 **throwing things. Again, it's a remote**
 18 **recollection. I don't trust it. That's the**
 19 **extent of my memory.**
 20 Q And would both parties be raising their
 21 voices, Mr. Depp and Amber?
 22 MR. PRESIADO: Objection; calls for

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1 speculation.
 2 BY MR. NADELHAFT:
 3 Q From what he told you.
 4 **A I don't -- I don't recall him talking**
 5 **about raising his voice. I can say he -- he**
 6 **withdrew a lot of times from -- from anger. It**
 7 **triggered recollections and difficulties for him**
 8 **from his past. It had him tempted to use to**
 9 **protect the feelings that he had when that**
 10 **happened. But, again, those are very general**
 11 **recollections from seven years ago.**
 12 Q Okay. Did -- in your sessions with
 13 Mr. Depp, did he ever raise his voice in any of
 14 your sessions?
 15 **A I don't think so. He was very respectful**
 16 **and actually charming with me.**
 17 Q Okay. What's the next -- then it says
 18 10/27/14?
 19 **A Uh-hum. 10/27/14.**
 20 **More odd relationship issues.**
 21 **Being accused, in his word, of being**
 22 **manic.**

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1 **Grounded by seeing children.**
 2 Q Okay.
 3 **A Son is one of the positive aspects of the**
 4 **relationship. I assume he's talking about his**
 5 **past relationship there.**
 6 Q Uh-hum.
 7 **A Relationship here -- current relationship**
 8 **reminds me of psychotic sister and mom.**
 9 **And then, bedtime and sleep hygiene.**
 10 Q So he -- so he was saying -- Mr. Depp was
 11 saying that Amber reminded him of his mom and his
 12 psychotic sister?
 13 **A That the relationship reminded him of his**
 14 **relationship with his psychotic sister and his**
 15 **mother, yes.**
 16 Q And -- and Mr. Depp talked about that he
 17 was being accused of being manic?
 18 **A Yes.**
 19 Q Did you -- did he say who accused him of
 20 being manic?
 21 **A I assume from this it was Amber.**
 22 Q Did Mr. Depp describe at all how he

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1 responded to being accused of being manic?
 2 **A I don't recall.**
 3 Q Okay. Turn to the next page, BLAUSTEIN
 4 16. And this is 10/29/14 at the top?
 5 **A Yup.**
 6 Q Okay. And what's the word that's
 7 underlined?
 8 **A Individual 45. Individual -- stands for**
 9 **individual psychotherapy.**
 10 Q Okay. And what's the first line say?
 11 **A First meeting with new patient.**
 12 Q So 10/29/14 was the first time you met
 13 Mr. Depp in person, correct?
 14 **A Correct.**
 15 Q Okay. And then what does it say?
 16 **A Mood - euthymic.**
 17 Q What does that mean?
 18 **A Attention -- normal mood.**
 19 Q Okay.
 20 **A Attention decreased.**
 21 Q What do you mean by attention decreased?
 22 **A Memory.**

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<p>169</p> <p>1 Difficult with attention –</p> <p>2 Q Okay.</p> <p>3 A – paying attention.</p> <p>4 Q Okay. Okay, sorry.</p> <p>5 Memory...</p> <p>6 A Memory - transitional difficulties.</p> <p>7 Q And what do you mean by having</p> <p>8 transitional difficulties with his memory?</p> <p>9 A It would have been part of a – a</p> <p>10 Mini-Mental status test that I would have done in</p> <p>11 the first session where he would have trouble</p> <p>12 holding onto memory of things from five minutes</p> <p>13 ago. If I ask him for – to remember three words,</p> <p>14 he may have had difficulty – he would have had</p> <p>15 difficulty remembering those three words five</p> <p>16 minutes later after distracting him with other</p> <p>17 conversation.</p> <p>18 Q Do you have results of those tests in your</p> <p>19 possession?</p> <p>20 A No. This is just a conversational –</p> <p>21 Q Okay.</p> <p>22 A – evaluation.</p>	<p>171</p> <p>1 Q Okay.</p> <p>2 A Learning, perhaps, her father's an</p> <p>3 alcoholic, her – maybe his mother – his mother/</p> <p>4 sister psychotic and abusive. So it would have</p> <p>5 been difficult having learned to set boundaries</p> <p>6 and limits to intrusions into his own life. I</p> <p>7 guess his father was an alcoholic and his mother</p> <p>8 and sister was abus- – were abusive.</p> <p>9 Q Okay.</p> <p>10 A Yeah, I don't know what this part –</p> <p>11 project into each of them and – yeah, I – I</p> <p>12 don't know what that's referring to.</p> <p>13 Q Okay. The next one?</p> <p>14 A Much – much more stable than three weeks</p> <p>15 ago. Clear of all drugs except THC.</p> <p>16 Q Are you saying that Mr. Depp was much more</p> <p>17 stable than three weeks ago or is Mr. Depp saying</p> <p>18 he was much more stable than three weeks ago?</p> <p>19 A I think he was saying it. But it also</p> <p>20 would have been my observation.</p> <p>21 Q Okay.</p> <p>22 A And clear of all drugs, that would be him</p>
<p>170</p> <p>1 Q All right. And then what does it say</p> <p>2 after that?</p> <p>3 A THC - marijuana as part of issue.</p> <p>4 Tetrahydrocannabinol.</p> <p>5 Q Okay.</p> <p>6 A That's what THC stands for.</p> <p>7 Q So you saw THC as an issue with Mr. Depp's</p> <p>8 memory and attention; is that right?</p> <p>9 A Well, with the transitional memory at</p> <p>10 least, yes.</p> <p>11 Q Okay.</p> <p>12 A And perhaps the attention.</p> <p>13 Q Okay. And then what does it say next?</p> <p>14 A Relationship role.</p> <p>15 Q Okay.</p> <p>16 A Setting absolute boundaries and limits.</p> <p>17 Q What did you mean by that?</p> <p>18 A Well, there might be a little more to come</p> <p>19 when –</p> <p>20 Q Okay.</p> <p>21 A My recollection will be refreshed if we</p> <p>22 read on a little bit more.</p>	<p>172</p> <p>1 saying it. Obviously, except marijuana.</p> <p>2 Q And how was Mr. Depp when he -- the three</p> <p>3 weeks prior? Where you're saying now he's more</p> <p>4 stable, how was he three weeks prior to that?</p> <p>5 A Well, probably hadn't stopped using –</p> <p>6 again, I don't have a specific recollection, so</p> <p>7 let me just say – say that stopping using drugs</p> <p>8 would have been a part of it.</p> <p>9 Q Okay. All right. And then what does it</p> <p>10 say?</p> <p>11 A Meds - consider changing Inderal to</p> <p>12 atenolol –</p> <p>13 Q Okay.</p> <p>14 A – and consider decreasing Lexapro.</p> <p>15 Wondering about Adderall as he's trying to</p> <p>16 combat – he's trying to combat THC. To talk to</p> <p>17 Dr. Kipper about these things, presumably after</p> <p>18 the second meeting.</p> <p>19 Q Okay. So you were thinking about</p> <p>20 potentially -- you talked to Mr. Depp about</p> <p>21 changing the amount of use of Adderall; is that</p> <p>22 right?</p>

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1 **A I don't know if I talked to him about it**
 2 **at that time or if it's me wondering about it,**
 3 **then to talk to Dr. Kipper about it.**
 4 Q Okay. Then the next is 11/6/14. This --
 5 again, Mr. Depp came in to meet with you, correct?
 6 **A Correct.**
 7 Q Okay. And what -- and what does it say
 8 here?
 9 **A In -- in to discuss strategy for breakup**
 10 **of relationship.**
 11 Q Okay.
 12 **A Especially focused on core trust issues,**
 13 **lying.**
 14 **Rebel against authority. Adaptive. No**
 15 **high necessary.**
 16 Q So Mr. Depp was telling you that he
 17 thought that Amber was lying to him about
 18 something?
 19 **A Yes.**
 20 Q Okay. Did he say -- did Mr. Depp say
 21 what?
 22 **A I don't recall.**

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1 Q Okay. All right, keep going.
 2 **A MSE - mental status examination. More**
 3 **present, more attention.**
 4 **Off on dates. Asked when I -- when I**
 5 **would ask him about what today might be, what**
 6 **today's date was, perhaps that's what that's**
 7 **referring to.**
 8 Q So Mr. Depp was off on -- on --
 9 **A On what date that was -- what date it was.**
 10 Q -- on the date? Okay.
 11 **A Uh-hum.**
 12 **Five minutes late.**
 13 **Idea of seeing relationship through prism**
 14 **of what it gives back. Not, something, of**
 15 **another.**
 16 Q Okay.
 17 **A Something -- something I would have been**
 18 **talking to him about.**
 19 **Introducing notion of narcissistic injury.**
 20 Q What does that mean?
 21 **A I would have been talking to him about**
 22 **what the impact of some of his early traumas were**

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1 **and what that -- how that might manifest today,**
 2 **may be part of -- it would be part of the**
 3 **treatment.**
 4 Q What do you mean by "narcissistic injury"?
 5 **A Injury to self from childhood, kind of**
 6 **what I said. It's --**
 7 Q Okay.
 8 **A -- early traumatic experiences.**
 9 Q Did you see Mr. Depp having any
 10 narcissistic qualities?
 11 **A Again, I think that's calling for, you**
 12 **know, my psychiatric view of him rather than just**
 13 **talking about what he told me and what I told him.**
 14 Q I think this is a question you can answer.
 15 If you're not going to answer it -- I think this
 16 is a question you can answer. I mean, you
 17 mentioned narcissistic injury. Do you see him --
 18 did you see Mr. Depp as having narcissistic
 19 quality?
 20 **A Well, I answered the question about**
 21 **narcissistic injury. When you ask it -- when you**
 22 **ask about narcissistic qualities, that's a**

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1 **diagnostic evaluation that I'm not --**
 2 Q Okay. I'll move on -- if you're not going
 3 to answer it, we'll just move on.
 4 **A Okay. Okay.**
 5 Q What's the next line say?
 6 **A Still no opportunity for clinical**
 7 **evaluation given current relationship crisis.**
 8 Q What does that mean?
 9 **A That means that I would have wanted to do**
 10 **a more thorough psychiatric examination of him,**
 11 **further evaluation of him, talk more about other**
 12 **aspects of his life and get a better and broader**
 13 **understanding of him in the early sessions, and**
 14 **didn't have the opportunity of advocacy. In some**
 15 **ways he was in crisis mode and really wanted to**
 16 **talk about the relationship issues.**
 17 Q Okay. And so did he give you any more
 18 information -- did Mr. Depp provide you any more
 19 information on this relationship crisis that's --
 20 that's not referenced here in your notes?
 21 **A I'm sure he talked a lot about it, but I**
 22 **don't recall.**

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<p style="text-align: right;">177</p> <p>1 Q Okay. Turning to the next page, BLAUSTEIN</p> <p>2 17. It says JD at the top, and then 11/10/14. Do</p> <p>3 you see that?</p> <p>4 A Yeah, I have that.</p> <p>5 Q Okay. And Mr. Depp came in to see you on</p> <p>6 11/10/14?</p> <p>7 A Correct.</p> <p>8 Q Okay. And what's the first line say?</p> <p>9 A Some clouding probably secondary to THC,</p> <p>10 but --</p> <p>11 Q What do you mean by "clouding"?</p> <p>12 A Would have been something in -- confusion</p> <p>13 or something about his mental state, or less --</p> <p>14 less sharp. Less alert, perhaps. Claims --</p> <p>15 Q Next line -- okay, sorry.</p> <p>16 A Uh-hum.</p> <p>17 Q What's the next line say?</p> <p>18 A It says no evidence of mania/hypomania.</p> <p>19 Q What do you mean by that?</p> <p>20 A That I didn't see in his presentation any</p> <p>21 evidence of mania or hypomania.</p> <p>22 Q Is there a reason you wrote that down for</p>	<p style="text-align: right;">179</p> <p>1 relationship or help getting out.</p> <p>2 Q Did Mr. Depp answer that question, if he</p> <p>3 wanted it -- help fixing his relationship or</p> <p>4 getting out of his relationship?</p> <p>5 A I know he was confused about that at that</p> <p>6 time.</p> <p>7 Q Okay. And then what's next?</p> <p>8 A Loyal.</p> <p>9 Father he thought had regarding courage --</p> <p>10 college. Maybe college.</p> <p>11 And learned in his 30s that father left</p> <p>12 because mother threatened with, something.</p> <p>13 Q Okay. What's the last words there?</p> <p>14 A Sees sister Debbie in Amber.</p> <p>15 Q Okay. Did Mr. Depp explain at all what he</p> <p>16 means by seeing Debbie in Amber?</p> <p>17 A I assume Debbie means the sister that he</p> <p>18 calls a psychotic sister, and that he saw</p> <p>19 parallels between the two of them.</p> <p>20 Q Okay. And then it's 11/11/14. Mr. Depp</p> <p>21 came in for another session?</p> <p>22 A Correct.</p>
<p style="text-align: right;">178</p> <p>1 this session?</p> <p>2 A I can't recall.</p> <p>3 Q Okay. Next line?</p> <p>4 A Discussion about relationships. Core</p> <p>5 issues of trust. Amber says context -- contact.</p> <p>6 Don't know.</p> <p>7 Q Okay.</p> <p>8 A Fruitless meeting with her therapist.</p> <p>9 Q Did Mr. Depp talk to you at all about his</p> <p>10 meeting with Amber's therapist other than that it</p> <p>11 was fruitless?</p> <p>12 A I can't recall.</p> <p>13 Q Okay. Did you recall talking to anyone</p> <p>14 else about the meeting that Amber and Mr. Depp had</p> <p>15 with Amber's therapist?</p> <p>16 A No.</p> <p>17 Q Did you ever observe Mr. Depp with mania</p> <p>18 or hypomania in any of your other sessions?</p> <p>19 A Not that I recall.</p> <p>20 Q Okay. And then it says -- I think then it</p> <p>21 says issue?</p> <p>22 A Issue, yeah. Does he want help fixing</p>	<p style="text-align: right;">180</p> <p>1 Q Okay. And what does it say now?</p> <p>2 A More about relationship issues. Does he</p> <p>3 want out. Needs to access exit door to know.</p> <p>4 Something he would have said, victim of</p> <p>5 psychology.</p> <p>6 Q Do you know what Mr. Depp was referring to</p> <p>7 when he said victim of psychology?</p> <p>8 A I think he was talking about his own</p> <p>9 psychology as interfering with clear choices about</p> <p>10 this relationship.</p> <p>11 Q And then the next line?</p> <p>12 A Notion of loyalty interferes with access</p> <p>13 to the exit door. Father's abandonment.</p> <p>14 Q Okay. Next line.</p> <p>15 A Question -- I'm sorry?</p> <p>16 Q No, keep going.</p> <p>17 A Okay. Question of -- answer, emotional</p> <p>18 texts. Slaved, has a dream of being free. He</p> <p>19 dreams of being king.</p> <p>20 Q Do you know what Mr. Depp was referring to</p> <p>21 there?</p> <p>22 A Again, I would have to interpret it from</p>

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<p style="text-align: right;">181</p> <p>1 today, not from then, because I don't recall then.</p> <p>2 MR. PRESIADO: Objection; calls for</p> <p>3 speculation.</p> <p>4 THE WITNESS: So I would imagine he was</p> <p>5 talking about feeling like a slave for the</p> <p>6 relationship, to other relationships. And in</p> <p>7 response probably to me talking about what freedom</p> <p>8 might feel like to him from the relationship, he</p> <p>9 said slaved, has a dream of being free, dreamed of</p> <p>10 being king. So, you know, that would be having</p> <p>11 sense of mastery in the relationship.</p> <p>12 Q Okay. And it looks like it says mental</p> <p>13 status.</p> <p>14 A No. Question of -- oh, I see, right below</p> <p>15 that, yeah.</p> <p>16 Mental status unchanged. Less depressed.</p> <p>17 Q Okay.</p> <p>18 A Dr. Kipper to discontinue afternoon</p> <p>19 Adderall.</p> <p>20 Q Then at 10/24/14 Mr. Depp came in for</p> <p>21 another individual session, correct?</p> <p>22 A 11/24/14.</p>	<p style="text-align: right;">183</p> <p>1 specifically.</p> <p>2 Q Okay. Okay. After the next line? It</p> <p>3 looks like it says vigilance?</p> <p>4 A Yeah. Vigilance as a child -- vigilance</p> <p>5 as child, but needs vigilance now.</p> <p>6 Q Okay.</p> <p>7 A Notion of being selfish to self-full.</p> <p>8 Last piece of bacon.</p> <p>9 Q Meaning who will get the last piece of</p> <p>10 bacon?</p> <p>11 A Well, it seemed that way.</p> <p>12 Q Okay. And then what's the last line?</p> <p>13 A Tied to -- could that be Christi? It</p> <p>14 wouldn't make sense. Especially notion of cage</p> <p>15 without exit door.</p> <p>16 Q Okay. Turning to BLAUSTEIN 18, which</p> <p>17 looks like it starts with 12/7/14.</p> <p>18 A Yeah.</p> <p>19 Q Mr. Depp came in for an individual</p> <p>20 session.</p> <p>21 A Correct.</p> <p>22 Q Okay. 25 minutes late.</p>
<p style="text-align: right;">182</p> <p>1 Q 11/24, I'm sorry. 11/24/14.</p> <p>2 A Yeah, uh-hum.</p> <p>3 Q And the first line says 15 minutes late?</p> <p>4 A 15 minutes late.</p> <p>5 Clear.</p> <p>6 Relationship stabilizing.</p> <p>7 Looking at jealous parts of him.</p> <p>8 Q What do you mean by that, looking at</p> <p>9 jealous parts of him?</p> <p>10 A Things that make him jealous. What his</p> <p>11 role might be in jealousy.</p> <p>12 Q And what made Mr. Depp jealous?</p> <p>13 A Well, about what was happening there. But</p> <p>14 with Amber, I don't know, I can't recall. I see</p> <p>15 in my next note there was a triggering point. My</p> <p>16 next note says triggering point, early breakup at</p> <p>17 22 where an actress cheated with a leading man.</p> <p>18 Q So was Mr. Depp jealous of Amber being</p> <p>19 with other men?</p> <p>20 MR. PRESIADO: Objection; calls for</p> <p>21 speculation.</p> <p>22 THE WITNESS: I don't remember that</p>	<p style="text-align: right;">184</p> <p>1 A Yes.</p> <p>2 Q And then what's the next line?</p> <p>3 A To target being on time.</p> <p>4 Q You were telling -- you were telling</p> <p>5 Mr. Depp to try to be on time for his</p> <p>6 appointments?</p> <p>7 A Certainly that. Maybe discussing why he</p> <p>8 comes late, came late, cancelled sessions, things</p> <p>9 like that.</p> <p>10 Q And then it looks like you have paranoia</p> <p>11 in quotes.</p> <p>12 A Uh-hum. It would have been his word. I</p> <p>13 don't know what he meant by that. The elements</p> <p>14 were fear, envy, and vigilance.</p> <p>15 Q So Mr. Depp told you something about</p> <p>16 paranoia?</p> <p>17 A Uh-hum. As he defined -- as he defined</p> <p>18 it.</p> <p>19 Q And his elements of paranoia were fear,</p> <p>20 envy, and vigilance --</p> <p>21 A Correct.</p> <p>22 Q -- as he told you? Okay.</p>

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<p>185</p> <p>1 And do you know what this paranoia was</p> <p>2 about, or who it was about?</p> <p>3 A No.</p> <p>4 Q Okay.</p> <p>5 A No. Seeing the -- the integration of</p> <p>6 particles of dust behind him.</p> <p>7 Q Do you know what that's referring to?</p> <p>8 A I could only assume from today that, you</p> <p>9 know, integration of fragmented feelings.</p> <p>10 Q Okay. And the next line?</p> <p>11 A How to communicate in couples therapy.</p> <p>12 Q Did you talk to Mr. Depp --</p> <p>13 A That would have been something that --</p> <p>14 Q -- about how to communicate in couples</p> <p>15 therapy?</p> <p>16 A I must have, yes.</p> <p>17 Q Okay. And then what does it say next?</p> <p>18 A Mood stable, clear. Hmm. Communicative.</p> <p>19 Q Okay. And then it's 12/4/14, Mr. Depp</p> <p>20 came in for another session, corr- -- oh, this was</p> <p>21 a telephone call -- conversation, correct?</p> <p>22 A This would have been a telephone call,</p>	<p>187</p> <p>1 Q So as of 12/4/14 you were still working</p> <p>2 with Mr. Depp on his use of multiple substances,</p> <p>3 correct?</p> <p>4 MR. PRESIADO: Objection; calls for</p> <p>5 speculation.</p> <p>6 THE WITNESS: Repeat the question again,</p> <p>7 please.</p> <p>8 Q As of 12/4/14 you were working -- you were</p> <p>9 still working with Mr. Depp on his -- on his use</p> <p>10 of multiple substances.</p> <p>11 MR. PRESIADO: Same objection.</p> <p>12 THE WITNESS: If that question implies</p> <p>13 that he was at that time using multiple</p> <p>14 substances, then I think I would say no. But</p> <p>15 people who have used or abused or became dependent</p> <p>16 upon multiple substances require working on that</p> <p>17 in the -- even in the context of sobriety,</p> <p>18 oftentimes for many, many years.</p> <p>19 Q Okay. And so you think -- you believe</p> <p>20 that as of 12/4/14 Mr. Depp, other than marijuana,</p> <p>21 was not using any substances?</p> <p>22 A I can't say with certainty one way or</p>
<p>186</p> <p>1 yes. It probably was a -- we had scheduled to be</p> <p>2 in person, but it was replaced with a telephone</p> <p>3 call.</p> <p>4 Q Okay. And --</p> <p>5 A Rela- -- relationship is stabilizing.</p> <p>6 Unable to make it to the office. No assessment of</p> <p>7 clarity. Using adult to attend to a jealous</p> <p>8 angered child.</p> <p>9 Q Do you know what that line's referring to?</p> <p>10 A That's probably me talking to him about</p> <p>11 bringing an adult self to some of his angry,</p> <p>12 jealous feelings that he had as a child.</p> <p>13 Q Okay.</p> <p>14 A Father separated at 15. Mother's suicide</p> <p>15 attempt.</p> <p>16 Q Okay.</p> <p>17 A Long band member. Some kind of band</p> <p>18 member. Companionship at 22 as film career</p> <p>19 started.</p> <p>20 Continuing to look at substance issues to,</p> <p>21 something, psychological effects of multiple</p> <p>22 substances.</p>	<p>188</p> <p>1 another.</p> <p>2 Q Okay. And then at 12/10/14 Mr. Depp came</p> <p>3 in for an individual session?</p> <p>4 A Correct.</p> <p>5 Q And what does it say next?</p> <p>6 A Review of fight with Amber, maybe Sunday</p> <p>7 night.</p> <p>8 Q Did Mr. Depp say anything about the fight</p> <p>9 with Amber on Sunday night?</p> <p>10 A I'm sure he did, but I don't have any</p> <p>11 recollection of that.</p> <p>12 Q Okay. And what's the next line say?</p> <p>13 A Role of primitive place, relationship,</p> <p>14 relying upon. Makeup sex blur. How to have safe</p> <p>15 escape.</p> <p>16 Q Okay.</p> <p>17 A Talking about THC, to use 9:00 to</p> <p>18 1:00 a.m. every night only.</p> <p>19 Hold diamond up to examine his way to</p> <p>20 respond to emotions.</p> <p>21 Consider Wellbutrin while tapering other</p> <p>22 meds. Discussed with Dr. Kipper.</p>

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<p style="text-align: right;">189</p> <p>1 Q You were to discuss with Dr. Kipper about 2 tapering Mr. Depp off of certain medications? 3 A Oh, I think that note would be talking 4 about the possibility of starting Wellbutrin while 5 Dr. Kipper was tapering other medications. 6 Q Got it. Okay. Then at 12/11/14 Mr. Depp 7 came in for another individual session? 8 A Correct. 9 Q And what does it -- what do these notes 10 say? 11 A Devaluing of self, not organized. THC 12 dose decreased. Only 9:00 p.m. to 1:00 a.m., 13 tapering. 14 Starting, per Kipper, Wellbutrin, 15 75 milligrams every morning. 16 Pride of work as early light laborer. 17 Pumping gas. 18 Increased clarity. Mood good. 19 Seems more open to insight work. 20 Q Going back for a moment to the 12/10/14 21 where you wrote, makeup sex a blur, what did you 22 mean by that?</p>	<p style="text-align: right;">191</p> <p>1 Q All right. Turning to the next page, 2 BLAUSTEIN 19, which starts with 12/11 -- is it 3 12/11/14? 4 A 12/15. 5 Q 12/15/14. Mr. Depp came in for an 6 individual session? 7 A Yes. 8 Q And what did you write -- what did you 9 write here? 10 A Feels Wellbutrin is helping. Sharper. 11 Without THC 20 hours a day. Decrease 12 usage other times. 13 Clear. 14 Notion of taking in authenticity, 15 perhaps -- authenticity from power of self, feel 16 and express. 17 Q Okay. 18 A Drove himself. 19 Relationship with children. 20 Q When Mr. Depp came to your office, was 21 he -- did he typically drive himself or did 22 someone come with him?</p>
<p style="text-align: right;">190</p> <p>1 MR. PRESIADO: Objection; calls for 2 speculation. 3 THE WITNESS: Whatever their argument was 4 or whatever their fight was, was resolved not by 5 working through the issues and the argument, but 6 rather by having sex together. I think he 7 referred to that as makeup -- makeup sex -- 8 BY MR. NADELHAFT: 9 Q And -- 10 A -- was the expression. 11 Q Right. And "blur," what does that mean? 12 A Kind of the -- I don't know. But I'm 13 going to speculate that the blur of the sexual -- 14 the blur was about the sexual experience. 15 Q He couldn't -- that Mr. Depp couldn't 16 remember it -- 17 MR. PRESIADO: Objection. 18 Q -- or it just went quickly. 19 MR. PRESIADO: Objection; calls for 20 speculation. 21 THE WITNESS: Well, that -- I don't 22 remember, so I can't really answer.</p>	<p style="text-align: right;">192</p> <p>1 MR. PRESIADO: Objection; calls for 2 speculation. 3 THE WITNESS: I think he was oftentimes 4 coming with somebody else. But I don't know who 5 that would be, and -- I think I recall a time -- I 6 recall a time of seeing -- someone would be in the 7 waiting room with him, who was going to wait for 8 him, who I asked to wait outside the waiting room. 9 A man, I think. I may be crossing wires on that. 10 BY MR. NADELHAFT: 11 Q Okay. 12 A And I think -- I think the reference here 13 would be feeling good about driving himself to his 14 appointment with me. 15 Q Then there's -- what's the next date, 16 12/18/14? 17 A Let's see. 12/18/14, yes. 18 Q And Mr. Depp came in for a session? 19 A Uh-hum, yes. 20 Q And -- 21 A Patient -- 22 Q Go ahead.</p>

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<p style="text-align: right;">193</p> <p>1 A Patient working, so psychotherapy on the 2 phone. It's possible it was a phone session that 3 I didn't mark as a phone session. 4 Big fight with girlfriend yesterday. 5 Struggling with how to separate. 6 Let her tell you her feelings. 7 Relationship needs to take care of you. 8 Her to go to a safe zone - withdraw. 9 Different than childhood experiences. 10 Q Where you write her to go to safe zone, 11 withdraw, different from childhood experiences, 12 what did you -- what was Mr. Depp telling you 13 there? 14 A I think this was me talking to him about 15 when they get into fights, arguments, that if 16 they're not able to work on it and to resolve it, 17 to withdraw and have each of -- well, have each of 18 them go to a safe zone. 19 I think as I'm saying this, that there was 20 some -- some discussion about him -- again, I -- 21 really, my recollection's bad. When the fights 22 would escalate and the voices would raise, that he</p>	<p style="text-align: right;">195</p> <p>1 A Stable, clear, relationship improved, 2 working on selfishness, supportive self, clarity. 3 How to take care of self and -- instead of using 4 while working in February. Continuing sobriety. 5 Q Okay. And then it says 1/6/15, correct? 6 A Correct. 7 Q And what do these notes say? 8 A Patient late, 20 minutes. 9 Positive hypnotherapy session. Goals - to 10 make a beeline to bed. 11 Using relationship to take care of the 12 individuals. 13 Let's see. 14 Not logical approach to Amber's work. 15 Take care of emotions. 16 Sobriety continuing. 17 Preparing for week of travel, I think. 18 Q Do you know what is meant by "not logical 19 approach to Amber's work"? 20 A Give me a moment to think of that. I 21 might be able to recover it. 22 Yeah, I think he had envious, jealous</p>
<p style="text-align: right;">194</p> <p>1 would want to leave and to get away from the fight 2 and she wouldn't want to. Again, I -- I don't 3 really have a lot of confidence about my 4 recollections here, but it's -- and so I was 5 encouraging them to talk about how, when those 6 things escalate, to -- if they can't work through 7 it -- and, obviously, there were times that they 8 couldn't -- to find a way to separate: for her to 9 withdraw; for him to withdraw; for her to go to a 10 place that feels safe; for him to have an exit 11 strategy at those times. 12 Q And from these notes from 12/18/14, you 13 don't know any details of the fight between Amber 14 and Mr. Depp. 15 A Correct. 16 MR. PRESIADO: Objection; misstates 17 testimony. He said "argument." 18 Q Looking at 12/23/14, Mr. Depp came in for 19 an individual session? 20 A Yes. 21 Q Okay. And it says -- the first notes say, 22 stable, clear?</p>	<p style="text-align: right;">196</p> <p>1 feelings of her being around other men, maybe 2 kinda -- another actor, perhaps, or men in 3 general. I can't really recall. Understanding 4 that they were not logical, and there were 5 recapitulations in the past. 6 Q Did -- do you recall if Mr. Depp mentioned 7 any men in particular? 8 A I don't recall. 9 Q Okay. James Franco? 10 MR. PRESIADO: Objection; asked and 11 answered, calls for speculation. 12 THE WITNESS: Doesn't sound familiar. 13 Q Okay. And -- 14 A I recognize the name, but -- 15 Q I understand. 16 A I recognize the name, but not context. 17 Q Were there any females that Mr. Depp was 18 jealous of with -- in regard to a relationship 19 with Amber? 20 A I don't recall. 21 Q Okay. And then BLAUSTEIN 20, if we can 22 move down to the last page.</p>

<p style="text-align: right;">197</p> <p>1 That says -- what's the date it says on 2 the top there? 3 A Uh-hum. 1/7/15. 4 Q And that's a telephone call with Mr. Depp? 5 A Yes. 6 Q And it says he was 30 minutes late? 7 A 30 minutes late. 8 Successfully negotiating with Amber on 9 issues of emotion. 10 Increased Wellbutrin per Dr. Kipper. 11 Endoscopy scheduled next week. 12 Q Okay. And then what's the last entries 13 there? 14 A Late -- late 22 minutes. 15 Q And this is for 1/8/15, just to be clear? 16 A 1/8/15, correct. 17 Q Okay. 18 A 22 minutes late. 19 Vulnerability - woman in studio who 20 admired Amber. Threat. 21 Q What did that mean? What did you 22 understand that to mean?</p>	<p style="text-align: right;">199</p> <p>1 the -- be free of the relationship or fight for 2 it. 3 Q Okay. 4 A And positive relatedness with Amber 5 through -- well, dash, vulnerability. 6 Q Did -- and 1/8/15 was the last time you 7 saw or spoke to Mr. Depp as a patient, correct? 8 A I believe that's true. 9 Q Did Mr. Depp describe to you at all how 10 his jealousy would present itself, whether he was 11 jealous of a man or a woman in relation to Amber? 12 A It would make him angry. It would make 13 him feel insecure. 14 MR. NADELHAFT: All right. Thank you. I 15 have no more questions at this time. 16 THE WITNESS: Okay. 17 MR. PRESIADO: I may not have any 18 questions. Why don't we take ten minutes just so 19 I can review my notes. 20 MR. NADELHAFT: Okay. 21 THE WITNESS: Okay. 22 THE VIDEOGRAPHER: Off the record at 5:23.</p>
<p style="text-align: right;">198</p> <p>1 A That probably related to your prior 2 question that there was a woman who admired her 3 that he felt jealous of. 4 Let's see. The next thing is, something, 5 of vulnerability. Instance -- instances of 6 vulnerability. 7 Q Okay. 8 A And internal feel, parallel to 9 vulnerability and childhood/inability. 10 Free or fight - only way. And -- 11 Q What does that mean, "free or fight - only 12 way"? 13 MR. PRESIADO: There's a -- 14 THE WITNESS: I think -- 15 Sorry? 16 MR. PRESIADO: I didn't hear the -- I'm 17 sorry, I didn't hear -- I didn't hear what you 18 said with respect to free or flee, as to that 19 word. 20 THE WITNESS: Free -- free or fight, or 21 free and fight are the only way. 22 And my understanding of that is, see</p>	<p style="text-align: right;">200</p> <p>1 MR. PRESIADO: Thank you. 2 (Recess was held.) 3 THE VIDEOGRAPHER: Back on the record at 4 5:35. 5 MR. PRESIADO: I don't have any questions. 6 MR. NADELHAFT: Okay. I don't have any 7 further questions. 8 MR. PRESIADO: Thank you, Doctor. 9 Appreciate your time. 10 THE VIDEOGRAPHER: Okay. We're off the 11 record at 5:35. 12 (Off the record at 5:35 p.m.) 13 14 15 16 17 18 19 20 21 22</p>

