

A

Laurel Anderson
Proffer Exhibit A
Depp v. Heard
CL-2019-0002911

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MAY 23 2022
JOHN T. FREY
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ORDER**

**Transcript of Laurel Anderson,
Ph.D., CCN**

Date: February 21, 2022

Case: Depp, II -v- Heard

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Transcript of Laurel Anderson, Ph.D., CCN

1 (1 to 4)

Conducted on February 21, 2022

<p>1 VIRGINIA: 2 IN THE CIRCUIT COURT FOR FAIRFAX COUNTY 3 4 ----- x 5 JOHN C. DEPP, II, : 6 Plaintiff, : Case No. 7 v. : CL-2019-0002911 8 AMBER LAURA HEARD, : 9 Defendant. : 10 ----- x 11 THIS TRANSCRIPT HAS BEEN MARKED CONFIDENTIAL 12 PURSUANT TO THE PROTECTIVE ORDER 13 ***** 14 Videotaped Deposition of 15 LAUREL ANDERSON, PH.D., CCN 16 Conducted Remotely via Zoom 17 Monday, February 21, 2022 18 1:00 p.m. 19 20 Job No.: 433788 21 Pages: 1 - 214 22 Reported By: AMY L. STRYKER, CCR</p>	<p>1 A P P E A R A N C E S 2 3 ON BEHALF OF PLAINTIFF JOHN C. DEPP, II: 4 BENJAMIN G. CHEW, ESQ. 5 ANDREW C. CRAWFORD, ESQ. 6 BROWN RUDNICK LLP 7 601 Thirteenth Street, NW, Suite 600 8 Washington, D.C. 20005 9 (202) 536-1785 10 and 11 CAMILLE M. VASQUEZ, ESQ. 12 SAMUEL A. MONIZ, ESQ. 13 BROWN RUDNICK LLP 14 2211 Michelson Drive 15 Irvine, California 92612 16 (949) 752-7100 17 and 18 JESSICA N. MEYERS, ESQ. 19 BROWN RUDNICK LLP 20 7 Times Square 21 New York, New York 10036 22 (212) 209-4800</p>
<p>1 Videotaped Deposition of LAUREL ANDERSON, 2 PH.D., CCN, conducted remotely. 3 4 5 Pursuant to subpoena, before AMY L. 6 STRYKER, Certified Court Reporter and Notary 7 Public of the State of Maryland. 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22</p>	<p>1 A P P E A R A N C E S C O N T I N U E D 2 3 4 ON BEHALF OF PLAINTIFF JOHN C. DEPP, II: 5 KATHLEEN T. ZELLNER, ESQ. 6 LAW OFFICES OF KATHLEEN T. ZELLNER 7 & ASSOCIATES 8 1901 Butterfield Road, Suite 650 9 Downers Grove, Illinois 60515 10 (630) 955-1111 11 12 ON BEHALF OF DEFENDANT AMBER LAURA HEARD: 13 ADAM NADELHAFT, ESQ. 14 CHARLSON BREDEHOFT COHEN & BROWN, P.C. 15 11260 Roger Bacon Drive, Suite 201 16 Reston, Virginia 20190 17 (703) 318-6800 18 19 20 21 22</p>

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<p>5</p> <p>1 APPEARANCES CONTINUED</p> <p>2</p> <p>3 ON BEHALF OF THE WITNESS:</p> <p>4 MICHELLE A. BIRTJA, ESQ.</p> <p>5 WOOD SMITH HENNING & BERMAN LLP</p> <p>6 10960 Wilshire Boulevard</p> <p>7 18th Floor</p> <p>8 Los Angeles, CA 90024</p> <p>9 (310) 481-7600</p> <p>10</p> <p>11 ALSO PRESENT:</p> <p>12 LUCIEN NEWELL, AV Technician</p> <p>13 DREW HALTON, Videographer</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>	<p>7</p> <p>1 Anderson 6 December 19, 2015 e-mail 40 from Heard to Anderson, Bates No. ALH_00006470</p> <p>2</p> <p>3 Anderson 7 March 8-10, 2016 e-mail 50 chain between Carino, Anderson, and Heard, Bates No. DEPP0003202</p> <p>4</p> <p>5 Plaintiff's 1 March 18 and 19, 2015 87 e-mail chain between Carino, Anderson, and Heard, Bates No. CC000169</p> <p>6</p> <p>7</p> <p>8 Plaintiff's 2 Dr. Anderson's redacted 91 notes</p> <p>9</p> <p>10 Plaintiff's 3 December 19, 2015 e-mail 139 from Heard to Anderson, Bates No. ALH_00006470</p> <p>11</p> <p>12 Plaintiff's 4 March 8th-9th, 2016 145 e-mail between Carino and Anderson, Bates No. CC000126</p> <p>13</p> <p>14 Plaintiff's 5 Session tracking ledger 172</p> <p>15</p> <p>16 Plaintiff's 6 November 18, 2019 175 Treatment Summary for Amber Heard (AH) and Johnny Depp (JD) in response to requests for release of mental health records</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>
<p>6</p> <p>1 CONTENTS</p> <p>2 EXAMINATION OF LAUREL ANDERSON, PH.D., PAGE CCN</p> <p>3 By Mr. Nadelhaft 9</p> <p>4 By Mr. Chew 69</p> <p>5 By Mr. Nadelhaft 194</p> <p>6 By Mr. Chew 210</p> <p>7</p> <p>8 EXHIBITS</p> <p>9 (Attached to transcript.)</p> <p>10 ANDERSON DEPOSITION EXHIBITS</p> <p>11 Anderson 1 Notice of Deposition of 11 Laurel Anderson; Deposition Subpoena for Personal Appearance in Action Pending Outside of California</p> <p>12</p> <p>13</p> <p>14 Anderson 2 Session tracking ledger 13</p> <p>15</p> <p>16 Anderson 3 March 18th and 19th, 2015 32 e-mail chain between Carino, Anderson and Heard, Bates No. CC000172</p> <p>17</p> <p>18 Anderson 4 September 9th and 10th, 36 2015 e-mail chain between Carino, Anderson, and Heard, Bates Nos. CC000127 and CC000128</p> <p>19</p> <p>20</p> <p>21 Anderson 5 September 27th-30th, 2015 38 e-mail chain between Heard, and Anderson, Bates No. DEPP0003216</p> <p>22</p>	<p>8</p> <p>1 PROCEEDINGS</p> <p>2 THE VIDEOGRAPHER: Here begins Disk No. 1</p> <p>3 in the video deposition of Laurel Anderson, Ph.D.,</p> <p>4 in the matter of John C. Depp, II vs. Amber Laura</p> <p>5 Heard In The Fairfax County Circuit Court of</p> <p>6 Virginia, Case No. CL-2019-0002911.</p> <p>7 Today's date is February 21, 2022. The</p> <p>8 time on the video monitor is 1:00 p.m. Eastern.</p> <p>9 The videographer is Drew Halton, representing</p> <p>10 Planet Depos. All participants are attending</p> <p>11 remotely.</p> <p>12 Would counsel please voice-identify</p> <p>13 themselves and state whom they represent.</p> <p>14 MR. NADELHAFT: Adam Nadelhaft for Amber</p> <p>15 Heard. Clarissa Pintado may be joining after we</p> <p>16 begin.</p> <p>17 MR. CHEW: Ben Chew and Jessica Meyers</p> <p>18 from Brown Rudnick LLP for Plaintiff, John C.</p> <p>19 Depp, II.</p> <p>20 MS. BIRTJA: Michelle Birtja of Wood Smith</p> <p>21 Henning & Berman for the witness.</p> <p>22 MS. ZELLNER: Kathleen Zellner from</p>

<p style="text-align: right;">9</p> <p>1 Kathleen Zellner & Associates for John C. Depp, 2 II. 3 THE VIDEOGRAPHER: The reporter is Amy 4 Stryker, representing Planet Depos. 5 Would the reporter please swear in the 6 witness. 7 LAUREL ANDERSON, PH.D., CCN, 8 after having been duly sworn, testified as 9 follows: 10 EXAMINATION 11 BY MR. NADELHAFT: 12 Q Good morning, Dr. Anderson. 13 A Good morning. 14 Q My name is Adam Nadelhaft. I represent 15 Amber Heard. I, along with Amber, thank you for 16 your time today. 17 Can you please provide your full name. 18 A Laurel Avis Anderson. 19 Q And what is your business address? 20 A It's been a while. 10921 Wilshire 21 Boulevard, Westwood Medical Plaza, Suite 1101, Los 22 Angeles 90024.</p>	<p style="text-align: right;">11</p> <p>1 Q And as you're doing, please keep answering 2 with words. "Yes" or "no"s when appropriate. 3 "Uh-huh"s and "uh-uh"s are hard for it to be 4 picked up by the court reporter. And that way we 5 know exactly what you mean. Does that make sense? 6 A Yes. 7 Q Okay. 8 MR. NADELHAFT: Can we put up Attachment 9 1. 10 AV TECHNICIAN: Stand by. 11 MR. NADELHAFT: And this will be Anderson 12 Exhibit 1. 13 Q A document is going to be coming up on the 14 screen for you to see. Okay, Dr. Anderson? 15 A Yes. 16 (Anderson 1, Notice of Deposition of 17 Laurel Anderson; Deposition Subpoena for Personal 18 Appearance in Action Pending Outside of 19 California, was marked for identification and is 20 attached to the transcript.) 21 Q Do you see what's been marked as 22 Anderson 1?</p>
<p style="text-align: right;">10</p> <p>1 Q Thank you. 2 I'm just going to give you a brief -- kind 3 of the rules of the road for the deposition today 4 so that it goes smoothly. 5 I'm going to be starting off asking you 6 questions. Please let me finish my question 7 before you answer, and I'm going to do my very 8 best to let you finish your answer before I ask my 9 next question so that we're not talking over each 10 other. Does that make sense? 11 A Yes. 12 Q If you do not understand my question, 13 please let me know. Okay? 14 A Okay. 15 Q Given that we're on Zoom and we're not 16 right in front of each other, if you can't hear me 17 for any reason, please let me know. Okay? 18 A Yes. 19 Q If you answer my question it will be 20 understood that you understood my question and 21 heard it. Does that make sense? 22 A Yes.</p>	<p style="text-align: right;">12</p> <p>1 A I do. 2 Q Do you understand this is a notice for 3 your deposition for today's date at 10:00 a.m. 4 from Mr. Depp? 5 A Okay. 6 Q Were you served with the subpoena? 7 A Yes -- well, it was sent to me or sent to 8 my office; I don't remember. 9 Q Okay. 10 MR. NADELHAFT: And we can take down 11 Attachment 1. 12 Q Have you ever been deposed in any cases 13 involving Johnny Depp? 14 A No. 15 Q Have you ever been deposed in any cases 16 involving Amber Heard? 17 A No. 18 Q And you're a clinical psychologist; is 19 that correct? 20 A Correct. 21 Q And you practice in Los Angeles? 22 A Yes.</p>

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Transcript of Laurel Anderson, Ph.D., CCN

4 (13 to 16)

Conducted on February 21, 2022

<p>13</p> <p>1 Q For how long have you been practicing?</p> <p>2 A Almost 40 years.</p> <p>3 Q Have you been practicing in Los Angeles</p> <p>4 for that entire time?</p> <p>5 A Yes.</p> <p>6 Q And you provide counseling for couples?</p> <p>7 A Psychotherapy for individuals and couples.</p> <p>8 Q And what is psychotherapy? Just a brief</p> <p>9 layman's description.</p> <p>10 A It's an evaluation of an individual or</p> <p>11 couples' problems. And then it's a</p> <p>12 conceptualization of what's actually going on in</p> <p>13 an effort to make intervention that leads to</p> <p>14 change.</p> <p>15 Q Okay.</p> <p>16 MR. NADELHAFT: Can we put up Attachment</p> <p>17 2, please.</p> <p>18 AV TECHNICIAN: Stand by.</p> <p>19 (Anderson 2, Session tracking ledger, was</p> <p>20 marked for identification and is attached to the</p> <p>21 transcript.)</p> <p>22 AV TECHNICIAN: Showing Exhibit 2 on the</p>	<p>15</p> <p>1 here so I can understand what the ledger means.</p> <p>2 Okay?</p> <p>3 A Yes.</p> <p>4 MR. NADELHAFT: Something happened there.</p> <p>5 Can we put back up Attachment 2, please.</p> <p>6 AV TECHNICIAN: Apologies.</p> <p>7 MR. NADELHAFT: No problem. Thank you.</p> <p>8 Q Do you see Attachment -- you see Anderson</p> <p>9 Exhibit 2 again, right, Dr. Anderson?</p> <p>10 A I do.</p> <p>11 Q Okay. At the top what are the two names</p> <p>12 that it says there?</p> <p>13 A Ann Henry and Joey Davis.</p> <p>14 Q And Ann Henry is Amber Heard?</p> <p>15 A Yes.</p> <p>16 Q And Joey Davis is Johnny Depp?</p> <p>17 A Yes.</p> <p>18 Q And then it says, Age 29 & 52; is that</p> <p>19 right?</p> <p>20 A Yes.</p> <p>21 Q And 29 was the age of Amber Heard at the</p> <p>22 time?</p>
<p>14</p> <p>1 screen.</p> <p>2 BY MR. NADELHAFT:</p> <p>3 Q And, Dr. Anderson, I'm showing you what's</p> <p>4 been marked as Anderson Exhibit 2. Do you see the</p> <p>5 document?</p> <p>6 A I do.</p> <p>7 Q Do you recognize what this document is?</p> <p>8 A Yes.</p> <p>9 Q What is it?</p> <p>10 A This is my ledger for tracking sessions</p> <p>11 that I use for invoice -- billing.</p> <p>12 Q And did this ledger come out of your</p> <p>13 files?</p> <p>14 A Yes.</p> <p>15 Q And you keep this document in the ordinary</p> <p>16 course of business?</p> <p>17 A Absolutely.</p> <p>18 Q Okay. I just want to -- and this</p> <p>19 particular ledger, who is it for?</p> <p>20 A It's -- well, despite the names that are</p> <p>21 camouflaged, it's for Ms. Heard and Mr. Depp.</p> <p>22 Q And I just want to go over some things</p>	<p>16</p> <p>1 A Yes.</p> <p>2 Q And 52 was the age of Johnny Depp?</p> <p>3 A Yes.</p> <p>4 Q What does it say next to the "W" there?</p> <p>5 MR. CHEW: Objection; hearsay.</p> <p>6 Q Unless your -- well, I'll let your</p> <p>7 attorney give you any legal advice. But unless</p> <p>8 she tells you not to answer, you can answer the</p> <p>9 question.</p> <p>10 MS. BIRTJA: And, Ms. Heard -- oh,</p> <p>11 Ms. Heard. Sorry; he just said Ms. Heard.</p> <p>12 Ms. -- Dr. Anderson, counsel can object to</p> <p>13 preserve their objections later for the record.</p> <p>14 Unless I instruct you not to answer, wait for them</p> <p>15 to object and then go ahead and give your answer</p> <p>16 unless I say differently. But you can go ahead.</p> <p>17 THE WITNESS: Okay.</p> <p>18 MR. CHEW: And just to be clear, the</p> <p>19 objection was hearsay.</p> <p>20 THE WITNESS: Scaramanga was a voice</p> <p>21 iden- -- or an identification on my phone and for</p> <p>22 me to know who's trying to reach me, because I</p>

17

1 think Mr. Depp got my -- yeah, it was -- I think
 2 he got my home number. And so I wanted to be able
 3 to recognize what that was when I saw that caller
 4 ID. So that was for him.
 5 BY MR. NADELHAFT:
 6 Q So when you -- just so I'm understanding,
 7 when you saw "Scaramanga" on your phone, that
 8 meant Mr. Depp was calling you?
 9 A Yes. I didn't see it very often, but
 10 having seen it once, I wanted to know what it
 11 meant and who it belonged to, because, in general,
 12 I don't pick up my phone.
 13 Q Understood.
 14 And what does it say under Scaramanga?
 15 A I'm not sure. MOOH Investment Trust.
 16 I -- I'm assuming it -- I don't remember exactly,
 17 but I'm assuming that was related in some way to
 18 Ms. Heard where I was trying to piece together the
 19 names of the different entities that were attached
 20 to them.
 21 Q Okay. All right. And then the -- to the
 22 top left-hand corner under Date it says 2015. Do

18

1 you see that?
 2 A I do.
 3 Q And then it starts with 10/1. I assume
 4 that means October 1st.
 5 A Yes.
 6 Q Okay. So for all the dates from 2015 down
 7 to where it says 2016, those were dates in October
 8 of 2015, correct?
 9 A Yes.
 10 Q Okay. So where it says 10/1 to the right
 11 of that, what does it say there?
 12 A Couple. That's a "CPL." It means couple,
 13 came in together.
 14 Q Okay. So does that -- and then next to
 15 that does it say 3 1/2?
 16 A Yes.
 17 Q Okay. And then all the way to the right
 18 under Date Billed, does that mean you bill -- does
 19 it say 11/8?
 20 A Yes.
 21 Q Okay. So that means you billed for that
 22 session on November 8, 2015?

19

1 A Yes.
 2 Q Okay. So as I understand it, on
 3 October 1, 2015, Mr. Depp and Amber Heard came in
 4 for couples counseling at -- for 3 1/2 hours?
 5 A Yes.
 6 MR. CHEW: Objection; leading.
 7 Q That was a "yes"?
 8 MS. BIRTJA: You can go ahead and answer
 9 again, Ms. -- Dr. Anderson. They're just
 10 concerned that with the objection you may have
 11 gotten cut off. So just go ahead and state your
 12 answer again.
 13 THE WITNESS: Yes. Whether they were in
 14 for the full 3 1/2 or not, I don't know, but that
 15 was the amount of -- that was when the session
 16 started, and they came in when they came in and --
 17 not together. And it took 3 1/2 hours to actually
 18 do that first session.
 19 Q So as I understand it, for that first
 20 session, Mr. Depp and Amber Heard did not come in
 21 together?
 22 A I don't believe that they did.

20

1 Q Okay.
 2 A I don't --
 3 Q Do you recall --
 4 A Oh.
 5 Q I'm sorry. I didn't know you weren't
 6 finished.
 7 Do you know who came in first?
 8 A No.
 9 Q Under the next row, what is that
 10 indicating?
 11 A The next session with Amber -- with
 12 Ms. Heard alone for background intake, and that
 13 was a 2 1/3-hour session.
 14 Q And that session was on October 6, 2015?
 15 A Yes.
 16 Q And what's the next row indicating?
 17 A The next day.
 18 MS. BIRTJA: Clarifying, Counsel, I think
 19 you mean 2015 not 2016. October 6, 2015.
 20 MR. NADELHAFT: Thank you. October 6,
 21 2015, correct.
 22 THE WITNESS: The next --

<p style="text-align: right;">21</p> <p>1 Q For that second -- I apologize. You saw 2 Amber on October 6, 2015 for 2 1/3 hours, correct? 3 A Yes. 4 Q And what is the next row indicating? 5 A The next day, October 7th, Mr. Depp for 6 3 1/2. Again, it may not have been face to face 7 for the full 3 1/2, but it was being at the 8 beginning of the session, waiting for him, his 9 coming in with the entourage and getting to work. 10 Q Do you recall how many people Mr. Depp 11 came to your office with? 12 A I think -- 13 MS. BIRTJA: Vague as to time. At that 14 appointment or generally? 15 MR. NADELHAFT: On that date. 16 THE WITNESS: No. On that date? But 17 it -- at least one extra. 18 Q Okay. And in general when you saw 19 Mr. Depp, how many people would come with him? 20 A I would say in general one for sure, 21 because I offered him things routinely; water. 22 But there may have been other people. I'm not</p>	<p style="text-align: right;">23</p> <p>1 of leading the witness. 2 BY MR. NADELHAFT: 3 Q You can't tell from these -- you can't 4 tell from this ledger whether it was in person or 5 not? 6 MR. CHEW: Objection; argumentative. 7 THE WITNESS: I can't. 8 Q Okay. What would you have to look to to 9 see whether it was in person or by some other 10 means? 11 A My notes. 12 Q Okay. 13 A So yes, the first three sessions were all 14 in person. 15 Q And then what does it say under the 16 October 7th session? 17 A 10/8. NS refers to no-show. They're 18 responsible for a one-hour session because I was 19 in my office waiting for them. 20 Q Okay. And then what does it say under -- 21 for the next row, for the 10/14 row? 22 A Couple, 3 hours.</p>
<p style="text-align: right;">22</p> <p>1 sure. 2 Q Do you know -- 3 A It may have only been one person. 4 Q Do you know who the person who was with 5 Mr. Depp? 6 MR. CHEW: Objection; vague. 7 Q You said you offered the person water, you 8 offered this person things when he was there. Do 9 you know who that person was? Do you know the 10 name? 11 A No. 12 Q Okay. Do you know what the occupation was 13 of that person who was with Mr. Depp? 14 A I can't say with certainty. My assumption 15 was that he was a driver, a bodyguard, somewhere 16 in between. Not sure. 17 Q And for the three sessions we just 18 discussed, the October 1st session, the 19 October 6th session, and the October 7th session, 20 those were all in person with you, correct? 21 A I would have to look. 22 MR. CHEW: I would object on the grounds</p>	<p style="text-align: right;">24</p> <p>1 Q So on October 14, 2015, Amber Heard and 2 Mr. Depp saw you for a couples session? 3 A Yes. 4 Q And then what does it say on the 10/21 5 row? 6 A "A" refers to Ms. Heard, phone session, 7 1 1/2. 8 Q And that looks like it's for 10/24/2015 9 what you just testified to; am I right? 10 MR. CHEW: Objection; leading, 11 argumentative. 12 THE WITNESS: Can you repeat the question, 13 please. 14 Q Sure. No problem. 15 You said you spoke to Amber Heard on the 16 phone for a half hour. That's for 10/24/2015; am 17 I right? 18 MR. CHEW: Objection; argumentative, 19 leading, hearsay. 20 THE WITNESS: No. What I -- you know 21 what, I'd have to look at my original instead of 22 the copy.</p>

<p style="text-align: right;">25</p> <p>1 MS. BIRTJA: I was going to say, 2 Mr. Technician, it may help her if we can make it 3 bigger because those lines are a little close 4 together and it may be small. 5 THE WITNESS: Michelle, I have my actual 6 record here. 7 MS. BIRTJA: Oh, okay. 8 THE WITNESS: Yes. And it was for 1 1/2 9 hours. 10 BY MR. NADELHAFT: 11 Q On what -- on what date? 12 A 10/24. 13 Q Okay. And there's a column above the 14 10/24 column, correct? 15 A A column? 16 Q A row. I'm sorry, a row above the 10/24 17 row. Thank you. 18 A There's the 10/21 couples session row. 19 Q Okay. Just so I'm clear, because I think 20 there was a -- I think you may have skipped a row. 21 There is a couples session on October 14th for 22 three hours; is that right?</p>	<p style="text-align: right;">26</p> <p>1 MR. CHEW: Objection; leading, 2 argumentative. 3 THE WITNESS: On 10/14 there's a couples 4 session. On 10/21 there's a couples session where 5 someone walked out for two hours. 6 BY MR. NADELHAFT: 7 Q Okay. 8 A On 10/24 Ms. Heard was there. We did a 9 phone session for 1 1/2. 10 Q And how did -- and on the 10/24 row next 11 to the 2 hours it says "W out," correct? 12 A It's 10/21. 13 Q 10/21. I'm making the mistake now. 14 On the 10/21 row, the couples session, it 15 says "W out" next to the 2 hours, correct? 16 MR. CHEW: Objection; leading. 17 Q You can answer that. 18 A I'm sorry, what was -- what are you 19 asking? 20 Q In the 10/21 row, what does it say in the 21 fourth column? 22 A Walked -- for me that's walk out.</p>
<p style="text-align: right;">27</p> <p>1 Q Okay. Thank you. 2 And do you recall who walked out of that 3 meeting? 4 A I have tried to and I don't. Because each 5 threatened and stood up, and I'm not positive who 6 finally did the walk out. 7 Q Okay. And then am I right that the rows 8 for 10/29 and 11/4 were couples sessions that were 9 cancelled? 10 A Yes. 11 Q And what does it say -- it looks like 12 it -- for both sessions it says something about 13 sick. What is it saying? 14 A They -- 15 MR. CHEW: Objection; hearsay. 16 Q You can answer. 17 A I think the message that was left to me 18 was that someone was sick. 19 Q And then what does it say -- what is it 20 indicating on the row for 11/12/2015? 21 A Couples session, showed, 1 1/2 hours. 22 I -- let me look. Yes.</p>	<p style="text-align: right;">28</p> <p>1 Q Okay. And then there's the next column, 2 the next row is for 11/19. What does that show? 3 A Couples session, cancelled at the last 4 minute. 5 Q And then what is it indicating for the row 6 for 12/4/2015? 7 A No show. 8 Q And that was going to be a couples 9 session? 10 A Yes. 11 Q And then the next row it says 12/10. What 12 does that show? 13 A The same thing. 14 Q That there was supposed to be a couples 15 session where there was a no-show? 16 A Yes. 17 Q And then on 12/17, what does that show? 18 A Amber alone showed 2 1/4 hours. 19 Q And then down -- so those were all of your 20 sessions with Amber or Mr. Depp in 2015, correct? 21 MR. CHEW: Objection; leading, 22 argumentative.</p>

29	<p>1 MS. BIRTJA: You can go ahead, 2 Dr. Anderson. 3 THE WITNESS: Yes. 4 BY MR. NADELHAFT: 5 Q And the bottom part of the page shows your 6 sessions for 2016; is that right? 7 A Yes. 8 Q What does the column for 1/13/2016 show? 9 A The row shows Ms. Heard came -- 10 Q Sorry. 11 A -- on 1/13 and showed up. 12 Q And what does the row for 1/20 indicate? 13 A Ms. Heard showed up. 14 Q And then what does the row for 6/18 15 indicate? 16 A Mr. Depp did a phone session for 1 1/4 17 hours. 18 Q And then what does the row for 7/13 19 indicate? 20 A It says Ms. Heard showed for -- and did a 21 3-hour session. 22 Q And what's it say next to the 3 hours --</p>	31	<p>1 A Ms. Heard was in London and we did a 2 1-hour session. But this was -- 3 Q And that -- 4 A -- by phone. 5 Q Okay. And then on 8/2/16, what does that 6 row indicate? 7 A Well, I want to see what my notes actually 8 say on it, if I saw him. 9 You know, I have a question on where it 10 was in my notes. This was Mr. Depp for less than 11 2 hours we had a session. 12 Q And then the bottom row on that page, 13 8/3/2016, what does that indicate? 14 A (Inaudible.) 15 (Reporter interruption.) 16 A Mr. Depp, half-an-hour phone session. 17 Q Is it based on the -- based on this ledger 18 you saw Amber and Mr. Depp for four couples 19 sessions? 20 A That's right. 21 Q Okay. 22 MR. NADELHAFT: All right. You can</p>
30	<p>1 A It says -- 2 Q -- to the right? 3 A -- her ledger. 4 Q Do you know what you meant by that? 5 A Yes, I believe I do. 6 Q What did you mean? 7 A I think that -- actually, I don't know. 8 Q Okay. And then -- 9 A At some point I made a separate ledger for 10 her. 11 Q And then the row for 7/27, what does that 12 indicate? 13 A Mr. Heard [sic], phone session, 1 hour. 14 MS. BIRTJA: Just to clarify, Mr. Depp? 15 THE WITNESS: I'm sorry, Mr. Depp. 16 Q And what's the row for 7/28/2016 indicate? 17 A Mr. Depp tried to reach me at my home. 18 Somehow he got ahold of me. We had a half-hour 19 phone session. 20 Q And then what does the row -- there's 21 another indication for 7/28/2016. What does that 22 row indicate?</p>	32	<p>1 take -- we can take this down, but just keep it 2 available. I may ask some other questions about 3 it. And can we put up Attachment 3. 4 AV TECHNICIAN: Stand by. 5 (Anderson 3, March 18th and 19th, 2015 6 e-mail chain between Carino, Anderson, and Heard, 7 Bates No. CC000172, was marked for identification 8 and is attached to the transcript.) 9 AV TECHNICIAN: Showing Exhibit 3 on the 10 screen. 11 BY MR. NADELHAFT: 12 Q Dr. Anderson, I'm showing you what's been 13 marked as Anderson 3. And I will let you -- which 14 is CC000172. I'll let you take a look at it. 15 It's a one-page e-mail. Just let me know when 16 you're finished. 17 MR. CHEW: Excuse me, Adam, I have that as 18 CC 169. Is this a different document? 19 MR. NADELHAFT: Can you scroll down? It 20 might -- you might have produced it twice. 21 MR. CHEW: Okay. I'm sorry. Yeah, they 22 must have produced it twice because the version I</p>

<p style="text-align: right;">33</p> <p>1 have is different. Okay. Thank you. 2 MR. NADELHAFT: Uh-hum. 3 THE WITNESS: Okay. 4 BY MR. NADELHAFT: 5 Q Dr. Anderson, are you finished reading the 6 e-mail? 7 A I am. 8 Q Okay. Do you recognize this e-mail chain? 9 A Yes. 10 Q Do you know who Christian Carino is? 11 A Yes. 12 Q For -- on March 19, 2015, where it shows 13 the e-mail of laurel.anderson28@gmail.com, that's 14 your e-mail? 15 A I'm sorry, say that again. 16 Q On the page where it says 17 laurel.anderson28@gmail.com, that's your e-mail 18 address? 19 A Yes. 20 Q The e-mail of March 28, 2015 from 21 Mr. Carino, he wrote, Laurel...my closest friend 22 Amber (on copy) wants to come see you. Alone</p>	<p style="text-align: right;">35</p> <p>1 MS. BIRTJA: May also be getting into 2 opinion testimony versus factual testimony as 3 you're asking for her understanding; and as you're 4 unwilling to pay her for opinion testimony it may 5 be an improper question outside the scope. 6 But go ahead. 7 BY MR. NADELHAFT: 8 Q There was a lot of objections there which 9 is under- -- I understand. 10 Why did you understand -- what was your 11 understanding as to why Amber Heard wanted to meet 12 with you? 13 MS. BIRTJA: Same objections. 14 MR. CHEW: Same objection. Clearly calls 15 for speculation as to what was in Ms. Heard's 16 mind. 17 Q You can answer, to the extent you can. 18 THE WITNESS: Michelle? 19 MS. BIRTJA: You can answer, to the extent 20 you can. 21 Although, Counsel, you're asking for her 22 understanding and to interpret what someone else</p>
<p style="text-align: right;">34</p> <p>1 first...and then with her husband, Johnny. Will 2 leave it to you two to arrange a time. 3 Love you both. 4 Do you see that e-mail? 5 MS. BIRTJA: To clarify, you mean the 6 18th? I believe you said 28th. March 18th? 7 MR. NADELHAFT: March 18th. Thank you. 8 Q Did you receive that e-mail from March 18, 9 2015? 10 A I did. 11 Q And you responded to Mr. Carino's e-mail, 12 correct? 13 A As you can see, yes. 14 Q Yeah. Okay. 15 Was it your understanding that as of 16 March 18, 2015, Amber was interested in working 17 with you on a relationship with Mr. Depp? 18 MR. CHEW: Objection; leading. 19 MS. BIRTJA: Objection. Also calls for 20 opinion and speculation. May lack foundation. 21 MR. CHEW: Join those objections on behalf 22 of--</p>	<p style="text-align: right;">36</p> <p>1 said, which I think is getting into opinion 2 testimony and not simple factual testimony. 3 But go ahead. 4 THE WITNESS: I took it at face value that 5 Ms. Heard wanted to have a consultation, and if -- 6 this is not infrequent that I might get an e-mail 7 like this, so -- and when I hear that someone may 8 then later want to come in with their husband or 9 spouse, yes, I think it has to do with 10 relationship issues. 11 MR. NADELHAFT: All right. Thank you. We 12 can take that down. And could you put up 13 Attachment 4, please. 14 AV TECHNICIAN: Stand by. 15 (Anderson 4, September 9th and 10th, 2015 16 e-mail chain between Carino, Anderson, and Heard, 17 Bates Nos. CC000127 and CC000128, was marked for 18 identification and is attached to the transcript.) 19 AV TECHNICIAN: Showing Exhibit 4 on the 20 screen. 21 BY MR. NADELHAFT: 22 Q Dr. Anderson, I'm showing you what's been</p>

<p style="text-align: right;">37</p> <p>1 marked as Anderson Exhibit 4, which is CC000127. 2 Please take a look at it and let me know when 3 you're done reading it. 4 A Okay. 5 Q On September 9, 2015 you received an 6 e-mail from Mr. Carino; is that right? 7 A Yes, apparently. He was trying to set it 8 up. 9 Q And Mr. Carino was trying to set up a 10 meeting with you and Amber and Mr. Depp; is that 11 right? 12 MR. CHEW: Objection; leading, 13 argumentative. 14 Q What did you -- 15 MS. BIRTJA: You can answer. You can 16 answer. 17 Q You can answer. 18 A Yes, that's what I assumed. 19 Q And you responded to Mr. Carino's e-mail, 20 correct? 21 A I did. 22 Q And then at the top you received an e-mail</p>	<p style="text-align: right;">39</p> <p>1 screen. 2 Q Dr. Anderson, I'm showing you what's been 3 marked as Anderson Exhibit 5, which is a 4 DEPP00003216. Take a look at this e-mail chain 5 and let me know when you're done reading it. 6 A Yes. 7 Q Okay. On September 27, 2015 you received 8 an e-mail from Amber Heard, correct? 9 A Yes. 10 Q And Amber wrote, Hi Laurel. Johnny and I 11 are back in town and would love to know if you 12 have any availability to see us this week. Please 13 let me know. Thanks. 14 You received that e-mail from Amber Heard? 15 A Yes. 16 Q And you responded that you were available 17 on Thursday at 5:30 p.m., correct? 18 A Yes. 19 Q And looking at the top of the e-mail where 20 it says, Wednesday, September 30th, would you 21 agree that the next day is Thursday, October 1, 22 2015?</p>
<p style="text-align: right;">38</p> <p>1 from Amber Heard? 2 A Yes. 3 Q And she wrote, Hi Laurel. Thank you so 4 much for responding. I really appreciate it. 5 I have to speak to my husband when he's 6 done working today and make sure he's good with 7 that time. I think it sounds perfect. Thank you 8 so much again. I'm really looking forward to 9 meeting you. 10 Did I read that correctly? 11 A Yes. 12 Q And you received that e-mail from Amber 13 Heard? 14 A I did. 15 MR. NADELHAFT: And we can take that down. 16 And can you put up Attachment 5, please. 17 AV TECHNICIAN: Stand by. 18 (Anderson 5, September 27th-30th, 2015 19 e-mail chain between Heard and Anderson, Bates No. 20 DEPP00003216, was marked for identification and is 21 attached to the transcript.) 22 AV TECHNICIAN: Showing Exhibit 5 on the</p>	<p style="text-align: right;">40</p> <p>1 A Yes. 2 MR. CHEW: Objection; leading, 3 argumentative. 4 MS. BIRTJA: You can go ahead, 5 Dr. Anderson. 6 THE WITNESS: Yes. 7 Q Okay. And if we need to, we can go back 8 to your billing ledger, but the first time you saw 9 Amber Heard and Mr. Depp was on October 1, 2015; 10 is that right? 11 A Yes. 12 Q Okay. 13 MR. NADELHAFT: All right. We can take 14 this down. And can you put up Attachment 6, 15 please. 16 AV TECHNICIAN: Stand by. 17 (Anderson 6, December 19, 2015 e-mail from 18 Heard to Anderson, Bates No. ALH_00006470, was 19 marked for identification and is attached to the 20 transcript.) 21 AV TECHNICIAN: Showing Exhibit 6 on the 22 screen.</p>

<p style="text-align: right;">41</p> <p>1 Q Dr. Anderson, I'm showing you what's been 2 marked as Anderson Exhibit 6, which is 3 ALH_00006470. Let me know when you're done 4 looking at it. 5 A Okay. 6 Q Do you recognize this e-mail from Amber 7 Heard? 8 A I -- it looks legitimate. Do I remember 9 it? No. 10 Q Okay. This was an e-mail you received 11 from Amber Heard on December 19, 2015? 12 A Yes, apparently. 13 Q And Amber wrote, Hey Laurel. I'm sorry to 14 report that unfortunately things don't seem to be 15 progressing well. I wish I could tell you why... 16 In part, I am sure from the time and type of 17 messages I'm getting from him, that his use is 18 continuing (and not helping). However, knowing 19 this, I am still lost as to how to get through to 20 him (via text message, as this is the form in 21 which we have been communicating) and at least put 22 off resolving this until after the holiday.</p>	<p style="text-align: right;">43</p> <p>1 that date, on the 19th. She was asking for some 2 phone contact and -- or I may have e-mailed her 3 back. I'm not sure. I don't have any of this 4 material. But I don't have it in my ledger. 5 BY MR. NADELHAFT: 6 Q Thank you. My question was: Did you see 7 Amber Heard on December 17, 2015? 8 A Yes. We -- we had established that, yes. 9 Q Okay. In working with Amber Heard, did 10 you have an understanding what she meant by "I am 11 sorry to report that unfortunately things don't 12 seem to be progressing well. I wish I could tell 13 you why"? 14 MS. BIRTJA: Objection. Asking for her 15 understanding as an expert opinion and going 16 beyond fact witness. It also calls for 17 speculation, lacks foundation. 18 But go ahead. 19 MR. CHEW: I would also join Michelle's 20 objection. It clearly calls for speculation. 21 MS. BIRTJA: To the extent you can, 22 Dr. Anderson, go ahead. If you don't know, you</p>
<p style="text-align: right;">42</p> <p>1 Do you think you would be able to speak by 2 phone today or tomorrow? Or help me in another -- 3 in any other way wrap my head around what to do? 4 I do have my own therapist but unfortunately the 5 nuances and complexity of our relationship - and 6 subsequently my reaction - are a bit lost on him. 7 So without putting too much pressure on you and 8 your otherwise peaceful holiday, can I ask for 9 your help on the phone? Maybe I could show you 10 our communication and you could tell me your 11 advice? Any help would be appreciated. I feel so 12 lost. 13 You received this e-mail from Ms. Heard? 14 A Yes. 15 Q Do you remember that you met with 16 Ms. Heard for a session on December 21, 2015? 17 MR. CHEW: Objection; asked and answered. 18 MS. BIRTJA: You can go ahead, 19 Dr. Anderson, if you need to check your ledger or 20 your notes to confirm. But yes or no, did you see 21 her on that date? 22 THE WITNESS: I wouldn't have seen her on</p>	<p style="text-align: right;">44</p> <p>1 can also tell him you don't know. 2 THE WITNESS: My belief is that their 3 relationship was falling apart. They were unable 4 to do couples therapy in a way that was going to 5 be useful. And she was upset. They both were. 6 BY MR. NADELHAFT: 7 Q And in working with Amber and Mr. Depp, do 8 you have an understanding as to what Amber was 9 referring to in the e-mail where she said, I'm 10 sure from the time and type of messages I'm 11 getting from him that his use is continuing and 12 not helping? 13 MS. BIRTJA: Same objections. 14 MR. CHEW: Objection. 15 MS. BIRTJA: Oh, sorry. Go ahead, Ben. 16 You can go first. 17 MR. CHEW: No, I apologize. 18 On behalf of Mr. Depp I would object to 19 the extent that it calls for speculation and on 20 hearsay grounds. 21 MS. BIRTJA: I'd object that it calls for 22 speculation, lacks foundation. Again, asking for</p>

<p style="text-align: right;">45</p> <p>1 her understanding or her belief as to what 2 something meant is asking opinion testimony, is 3 outside the scope of fact testimony. And since 4 you're unwilling to pay her for professional time, 5 I'd say it's beyond the scope. 6 But to the extent you can, Ms. Anderson, 7 go ahead. If you don't know, you can tell him you 8 don't know. 9 THE WITNESS: She was referring to some 10 sort of drug usage. 11 BY MR. NADELHAFT: 12 Q Did you have any -- in your sessions were 13 there any discussions of Mr. Depp's drug usage? 14 MS. BIRTJA: Well, I'm going to object, 15 Adam. You had me redact all the records based on 16 your release to only do sub- -- or, sorry, 17 substance abuse -- any physical abuse or assault 18 and redact everything else. So based on your 19 limited release, if we start talking about 20 substance abuse and other issues, it goes beyond 21 the scope of your authorization. 22 MR. NADELHAFT: I don't think it goes</p>	<p style="text-align: right;">47</p> <p>1 were discussions with Ms. Heard alone. I'm not 2 sure that there were discussions in a conjoined 3 session. I don't remember. 4 BY MR. NADELHAFT: 5 Q So whether they were in a conjoined 6 session or with Mr. Depp alone or with Amber Heard 7 alone, what drug usage of Mr. Depp was discussed? 8 MR. CHEW: Objection; leading, assumes 9 facts not in evidence, lack of foundation. 10 MS. BIRTJA: I'll also say it goes beyond 11 the scope. We had to redact out all the records, 12 all this information, and so she has no way to go 13 back and refresh her memory because of what you 14 had me redact out. You're going beyond the scope 15 of what you wanted released and authorized, and 16 she can't look at it now. 17 MR. CHEW: Yeah. Michelle, I will get to 18 that when it comes time to my direct. But we were 19 quite troubled, not by your client or by anything 20 you did, but we were quite troubled by the massive 21 amount of redactions. But we'll cross that bridge 22 when we come to it.</p>
<p style="text-align: right;">46</p> <p>1 beyond the scope of Mr. Depp's authorization. 2 This is about Mr. Depp. 3 MS. BIRTJA: Well, I'll let Ben object. 4 But I'm just saying, I think you're opening the 5 scope beyond that and I don't want to have any 6 HIPAA issues later. But if Ben doesn't object, go 7 ahead. 8 MR. CHEW: No, we -- we join in your -- 9 We join in the Michelle's objections. 10 MR. NADELHAFT: Okay. Are you -- so, 11 Michelle, are you telling her not to answer? I 12 just want it for the record. Either one. 13 MS. BIRTJA: You can go ahead, 14 Dr. Anderson. 15 But I'm going to put a limited leash here, 16 Adam, based on your office's very specific 17 limitations to the records and the multiple phone 18 conferences I had with Michael Dailey delineating 19 such limitations. 20 But go ahead, Dr. Anderson. 21 THE WITNESS: There -- I don't believe -- 22 there were discussions with Mr. Depp alone. There</p>	<p style="text-align: right;">48</p> <p>1 MR. NADELHAFT: To be clear, we -- 2 Ms. Heard -- Ms. Heard's counsel did not redact 3 any particular documents. We gave the HIPAA 4 disclosures to Michelle. There were discussions 5 about what the HIPAA disclosure was for Amber 6 Heard, and Michelle made the redactions based on 7 those discussions. We didn't tell her what to 8 redact, what specifically to redact. We had a -- 9 MR. CHEW: Well -- 10 MS. BIRTJA: We did have discussions as to 11 what the HIPAA release for Ms. Heard says, which 12 you have as well, Ben. 13 MR. CHEW: It's interesting that we 14 weren't party to those discussions. But that will 15 be for the judge to deal with at -- 16 MR. NADELHAFT: Michelle could have -- no 17 one stopped Michelle from calling you at all. 18 MS. BIRTJA: Okay. First off, we don't 19 have all the contact information of the 18 20 parties. 21 Second, your authorization was the one 22 that was limiting, not the other one, and it was</p>

Conducted on February 21, 2022

<p style="text-align: right;">49</p> <p>1 your authorization we were trying to understand 2 the scope of. Your authorization very 3 specifically limited it to only episodes of 4 physical abuse or abuse, not substance abuse and 5 all these other things. And, in fact, we were 6 specifically told by Michael Dailey, who I know 7 isn't specifically in your office but is on your 8 side and works with you, that the scope of this 9 deposition was solely to ask factual witness 10 questions as to the allegations of physical abuse 11 that occurred that she heard. And, in fact, I 12 believe the exact wording that he used to me: It 13 would be no different than deposing a girlfriend 14 and asking her simply what was told to her. 15 MR. NADELHAFT: Okay. 16 MS. BIRTJA: That was our understanding of 17 the scope, that was our understanding of what we 18 were supposed to limit per the very limited 19 authorization, and now you're the one going beyond 20 that. 21 MR. NADELHAFT: Again, I was asking about 22 Mr. Depp. But we'll move on. It's fine. It's</p>	<p style="text-align: right;">51</p> <p>1 Depp's apartment downtown; is that right? 2 A I did not know where he lived. 3 Q Oh, this e-mail says, Would you be willing 4 to make a house call to Johnny's apartment 5 downtown, correct? 6 A Did it say "downtown"? Yes, it did. 7 Okay. 8 Q And then you responded on March 8, 2016, 9 correct? 10 A Yes. 11 Q And you wrote, Hey Christian, Have, of 12 course, avoided this my whole career, unless 13 someone was in rehab. Would be willing to try it 14 once in that there's something I'd like Johnny to 15 understand that I don't think he does. 16 Where you wrote: I'd like Johnny to 17 understand that -- where you wrote: Would be 18 willing to try it once in that there's something 19 I'd like Johnny to understand that I don't think 20 he does, what did you mean by that? 21 A I can't say exactly what it was I wanted 22 to impart, but I know that -- I thought that he</p>
<p style="text-align: right;">50</p> <p>1 not a -- okay. 2 We can take this down. And can you put up 3 Attachment 7, please. 4 AV TECHNICIAN: Stand by. 5 (Anderson 7, March 8-10, 2016 e-mail chain 6 between Carino, Anderson, and Heard, Bates No. 7 DEPP00003202, was marked for identification and is 8 attached to the transcript.) 9 AV TECHNICIAN: Showing Exhibit 7 on the 10 screen. 11 BY MR. NADELHAFT: 12 Q Dr. Anderson, I'm showing you what's been 13 marked as Anderson Exhibit 7, which is DEPP 3202. 14 Take a chance to read it and let me know when 15 you're finished. 16 A Yes. 17 Q Attachment 7 is a -- at the bottom is a -- 18 you see a March 8, 2016 e-mail from Christian 19 Carino to you, correct? 20 A Yes. 21 Q And Christian Carino was asking if you 22 would be willing to make a house call to Johnny</p>	<p style="text-align: right;">52</p> <p>1 was having difficulty in the sessions, and I think 2 that was something about the process between the 3 two of them that I was trying to clue him into. 4 Q What difficulty was Mr. Depp having in the 5 sessions? 6 A Having a voice. 7 Q What do you mean by that? 8 MS. BIRTJA: Again, going into opinion 9 question and not factual. It's her clinical 10 opinion why he was having trouble and what the 11 source of the trouble was. And as you've already 12 said, you're unwilling to pay for opinion 13 testimony. This is only facts testimony. I'll 14 give a very limited leash on this line of 15 questioning. 16 But go ahead, Dr. Anderson. 17 THE WITNESS: Ms. Heard had a jackhammer 18 style of talking. She was very amped up. He had 19 trouble talking at a similar pace. Their 20 dialogue -- he was cut off a lot. So I -- I -- 21 I'm guessing this is what I was -- I'm not sure 22 what it is, but there was something -- anyhow,</p>

<p style="text-align: right;">53</p> <p>1 this is how he didn't have a voice. He couldn't</p> <p>2 keep up with her rapid-fire way of conversation,</p> <p>3 and so he was really overwhelmed.</p> <p>4 Q In working with Amber and Mr. Depp, did</p> <p>5 Amber ever report to you any physical violence on</p> <p>6 behalf of Mr. Depp toward Amber?</p> <p>7 A Yes.</p> <p>8 Q What type of physical violence did she</p> <p>9 report to you?</p> <p>10 MS. BIRTJA: You can refer to your notes</p> <p>11 if you need to do it for your recollection.</p> <p>12 Q Feel free. Go ahead.</p> <p>13 A It changed over time, but I think</p> <p>14 initially she was slapped.</p> <p>15 Q When you say "slapped," you mean Mr. Depp</p> <p>16 used an open hand, hit her with his open hand?</p> <p>17 A Yes.</p> <p>18 Q During your time working with Amber and</p> <p>19 Mr. Depp, did she ever report Mr. Depp pulling her</p> <p>20 hair?</p> <p>21 MR. CHEW: Objection; leading,</p> <p>22 argumentative, assumes facts not in evidence, lack</p>	<p style="text-align: right;">55</p> <p>1 and -- that is what I remember most. And it was</p> <p>2 going both ways.</p> <p>3 Q During your sessions did you recall Amber</p> <p>4 reporting Mr. Depp bruising Amber's face?</p> <p>5 MR. CHEW: Objection; leading,</p> <p>6 argumentative, lack of foundation, assumes facts</p> <p>7 not in evidence.</p> <p>8 MS. BIRTJA: You can go ahead,</p> <p>9 Dr. Anderson.</p> <p>10 THE WITNESS: I believe at the -- at the</p> <p>11 very end of their relationship there was an</p> <p>12 all-out brawl. And on that occasion -- I'm sorry,</p> <p>13 what was the specific -- bruising her face. Yes.</p> <p>14 That's when she took photos.</p> <p>15 MR. CHEW: I'm sorry. Would the court</p> <p>16 reporter read that back, please. I didn't hear.</p> <p>17 Dr. Anderson's voice trailed off, at least on my</p> <p>18 end.</p> <p>19 (The court reporter read the pertinent</p> <p>20 part of the record.)</p> <p>21 Q So you recall Amber reporting that she</p> <p>22 had -- that Mr. Depp gave her bruises on her face;</p>
<p style="text-align: right;">54</p> <p>1 of foundation.</p> <p>2 MS. BIRTJA: To the extent you recall,</p> <p>3 Dr. Anderson, go ahead. And please feel free to</p> <p>4 refer to your notes if it helps refresh your</p> <p>5 recollection.</p> <p>6 THE WITNESS: Don't need to.</p> <p>7 Yes.</p> <p>8 BY MR. NADELHAFT:</p> <p>9 Q So yes, Ms. -- Amber reported Mr. Depp</p> <p>10 pulling her -- pulling her hair? I just want to</p> <p>11 make sure I understood.</p> <p>12 A Yes.</p> <p>13 Q Okay. During your sessions with Amber and</p> <p>14 Mr. Depp, did Amber report Mr. Depp kicking Amber?</p> <p>15 MR. CHEW: Objection; leading, lack of</p> <p>16 foundation, assumes facts not in evidence,</p> <p>17 argumentative.</p> <p>18 MS. BIRTJA: Again, to the extent you</p> <p>19 recall, go ahead, Dr. Anderson. And if you need</p> <p>20 to refer to your notes, please do.</p> <p>21 THE WITNESS: I don't remember if she was</p> <p>22 saying it had devolved into an all-out brawl</p>	<p style="text-align: right;">56</p> <p>1 is that right?</p> <p>2 MR. CHEW: Objection; leading,</p> <p>3 mischaracterizes the testimony.</p> <p>4 MS. BIRTJA: You can go ahead,</p> <p>5 Dr. Anderson.</p> <p>6 THE WITNESS: I believe she showed me the</p> <p>7 photos, but I'm not positive. But she -- she did</p> <p>8 tell me.</p> <p>9 BY MR. NADELHAFT:</p> <p>10 Q Do you recall seeing photos from Amber</p> <p>11 Heard?</p> <p>12 A I -- I have, but I don't remember when I</p> <p>13 saw them.</p> <p>14 Q What do you recall about the photos?</p> <p>15 A Her face was bruised.</p> <p>16 Q And did she recall -- did -- what do you</p> <p>17 recall her telling you about where the bruises</p> <p>18 came from?</p> <p>19 MR. CHEW: Objection; calls for hearsay.</p> <p>20 MS. BIRTJA: It does.</p> <p>21 To the extent you recall, go ahead,</p> <p>22 Dr. Anderson.</p>

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1 THE WITNESS: From Mr. Depp.
 2 BY MR. NADELHAFT:
 3 Q Do you recall what -- where on her face
 4 you saw -- Amber's face you saw bruises?
 5 MR. CHEW: Objection. That's not --
 6 objection; mischaracterizes the testimony, lack of
 7 foundation, assumes facts not in evidence,
 8 argumentative.
 9 MS. BIRTJA: To the extent you recall any
 10 specifics, go ahead.
 11 MR. CHEW: From photographs.
 12 MS. BIRTJA: From photographs that she
 13 showed you, yes.
 14 THE WITNESS: I think they were around her
 15 eyes, but I couldn't be positive.
 16 Q Did you ever have any discussions with
 17 Mr. Depp about any physical violence of him toward
 18 Amber?
 19 **A They were in the context of physical**
 20 **violence toward him from her, so yes.**
 21 Q Did Mr. Depp ever say that he had been
 22 physically violent toward Amber?

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1 **A I'm not sure. I think it was implied, but**
 2 **I'm not sure he ever stated it. It takes two to**
 3 **have a brawl.**
 4 Q Did either Ms. Heard or Mr. Depp
 5 characterize the fight as a brawl or is --
 6 **A No.**
 7 Q The "brawl" is your characterization,
 8 correct?
 9 **A Yes.**
 10 Q In your meeting -- in your meetings with
 11 Amber and/or Mr. Depp, was there -- did you ever
 12 have any understanding of Mr. Depp throwing a
 13 phone at Amber?
 14 MR. CHEW: Objection; lack of foundation,
 15 assumes facts not in evidence, wildly leading, and
 16 argumentative.
 17 MS. BIRTJA: To the extent you recall, go
 18 ahead.
 19 THE WITNESS: I -- I'm not sure. It might
 20 have been in there, but I don't remember. And
 21 it -- it may be somewhere in my notes, but it's
 22 not in my redacted version.

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1 Q Did there come a time where you understood
 2 that Amber had filed for divorce from Mr. Depp?
 3 **A Yes.**
 4 Q Did you have an understanding that Amber
 5 also filed for a restraining order against
 6 Mr. Depp?
 7 **A Yes. Did you have any understanding as to**
 8 **what the restraining order was for?**
 9 MR. CHEW: Objection -- objection;
 10 leading, calls for -- clearly calls for
 11 speculation, hearsay.
 12 MS. BIRTJA: May call for speculation,
 13 lack of foundation.
 14 To the extent you were ever told or know,
 15 go ahead. If you don't, you can tell him you
 16 don't know.
 17 THE WITNESS: I don't know.
 18 Q Did you ever have any discussions with
 19 Amber about her seeking a protective order from
 20 Mr. Depp?
 21 MS. BIRTJA: Sorry, a protective order or
 22 restraining order?

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1 MR. NADELHAFT: Sorry, a restraining
 2 order.
 3 MR. CHEW: There is a protective order but
 4 that governs the use of documents in this case.
 5 MS. BIRTJA: Yeah. And just to be clear,
 6 she may not legally understand the difference. So
 7 at this point we're just talking about a
 8 restraining order.
 9 And to the extent that order was discussed
 10 with you and you recall, go ahead.
 11 THE WITNESS: I don't remember.
 12 BY MR. NADELHAFT:
 13 Q And do you recall ever telling Amber that
 14 she should not seek a restraining order against
 15 Mr. Depp?
 16 **A What I have in my memory more so -- I'm**
 17 **trying to remember. Wait a minute. If it's in my**
 18 **notes, then I did. I thought -- I thought she was**
 19 **characterizing what had occurred between the two**
 20 **of them somewhat inaccurately. And so I thought**
 21 **it was unfair, probably.**
 22 Q What did you believe was inaccurate?

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1 A She -- I perceived her as painting herself
 2 as a victim of spousal abuse when that's not what
 3 I witnessed exactly.
 4 Q Did you witness abuse by either --
 5 A I didn't witness. I didn't witness by
 6 either, but it was not my opinion that she was a
 7 victim of spousal abuse. She initiated it herself
 8 on many occasions. They fought with each other.
 9 And he had had a very long history of not being
 10 violent with any of his wives or women, and so I
 11 believe that this is a dance they created together
 12 that she had full role in. So to -- at the end of
 13 the devolvement of the marriage to then depict it
 14 as -- that she was the victim of spousal abuse and
 15 then go public with a restraining order just
 16 seemed, like, unfair. Not accurate.
 17 Q Had you worked with Mr. Depp before
 18 working with Amber and Mr. Depp?
 19 A No.
 20 Q What's your basis for saying that Mr. Depp
 21 hadn't been violent with other partners?
 22 A I did a 3 1/2-hour or some portion of that

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1 intake with him and he very clearly talked about
 2 having learned, as men often learn, that if
 3 there's conflict, he should walk away. That, and
 4 he had practiced that.
 5 And he told me about one instance where he
 6 was tempted as a very young man, but did nothing.
 7 So he was, I believe, proud of a long history of
 8 never having been violent with a woman.
 9 What he didn't learn, because someone
 10 would have had to teach him, is that you can
 11 separate from conflict. But you need to then say,
 12 I will come back, but I'm leaving for now, let's
 13 stop this, this isn't good, but I'm going to come
 14 back at such a time or tomorrow morning, we will
 15 talk about this again, I promise.
 16 Without having learned that piece, he
 17 triggered Ms. Heard terribly because of her
 18 anxiety disorder and she then did all sorts of
 19 things in response to not wanting him to leave.
 20 So it was a very unfortunate circle of events that
 21 repeated itself many times.
 22 Q So the -- your understanding of Mr. Depp

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1 not being violent with other partners was based on
 2 conversations with Mr. Depp, correct?
 3 A Abs- --
 4 MR. CHEW: Objection; mischaracterizes the
 5 testimony.
 6 MS. BIRTJA: Go ahead, Ms. Anderson,
 7 because I think your answer got cut off.
 8 THE WITNESS: I said absolutely.
 9 Q And is it your testimony that while
 10 Mr. Depp may have said that he wasn't violent with
 11 any of his other partners, there was violence
 12 between -- from Mr. Depp toward Amber, correct?
 13 MR. CHEW: Objection; argumentative, lack
 14 of foundation, contradicts the testimony in that
 15 she said she didn't witness any violence by either
 16 of them.
 17 MS. BIRTJA: Also asked and answered.
 18 But you can explain what was reported to
 19 you.
 20 THE WITNESS: Yes, you're right. He
 21 had -- he had been well controlled, I think, for
 22 almost, I don't know, 20, 30 years. And both were

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1 victims of abuse in their homes, but I thought he
 2 had been well controlled for decades. And then
 3 with Ms. Heard he was triggered and they engaged
 4 in what I saw as mutual abuse. Sometimes -- I'm
 5 not -- I know she led on more than one occasion
 6 and started it to keep him with her, because
 7 abandonment and having him leave was her worst
 8 nightmare. And I think he may have initiated it
 9 on occasions too. That, I'm less sure on.
 10 MS. BIRTJA: And just remember, listen to
 11 the question and answer solely the question posed
 12 to you.
 13 THE WITNESS: (Nonverbal response.)
 14 BY MR. NADELHAFT:
 15 Q How do you come to the understanding that
 16 Mr. Depp had initiated physical abuse on some
 17 occasions toward Ms. Heard?
 18 MR. CHEW: No, no, no, no, no. That's not
 19 what she said. That's a gross mischaracterization
 20 of the testimony.
 21 MS. BIRTJA: It does misstate testimony.
 22 But Ms. -- Dr. Anderson, you can clarify

<p style="text-align: right;">65</p> <p>1 as needed.</p> <p>2 THE WITNESS: What was the question, Adam?</p> <p>3 MR. CHEW: You mischaracterized the</p> <p>4 testimony grossly. So lack of foundation,</p> <p>5 mischaracterizes the testimony, assumes facts not</p> <p>6 in evidence. Nice try, though.</p> <p>7 MR. NADELHAFT: Just reread the question,</p> <p>8 Amy.</p> <p>9 (The court reporter read the pertinent</p> <p>10 part of the record.)</p> <p>11 THE WITNESS: Ms. Heard reported that.</p> <p>12 That's all.</p> <p>13 BY MR. NADELHAFT:</p> <p>14 Q And how did you come to the understanding</p> <p>15 that on some occasions Ms. Heard physically abused</p> <p>16 Mr. Depp?</p> <p>17 A Ms. Heard reported that.</p> <p>18 Q What did Ms. Heard report to you?</p> <p>19 A That it was a point of pride – two</p> <p>20 things. It was a point of pride to her, if she</p> <p>21 felt disrespected, to initiate a fight. And</p> <p>22 was – her father had beaten her, she was not</p>	<p style="text-align: right;">67</p> <p>1 But to the extent you can recall, go</p> <p>2 ahead.</p> <p>3 THE WITNESS: I'm foggy on that. I</p> <p>4 believe in the -- in one of the first sessions</p> <p>5 Ms. Heard tried -- established that he had slapped</p> <p>6 her first. But that was not while I was seeing</p> <p>7 them, and that was -- that's all I know.</p> <p>8 MR. NADELHAFT: Let's take -- we've gone</p> <p>9 an hour. Let's take a break. I may not have much</p> <p>10 more.</p> <p>11 MR. CHEW: Okay. I'm sorry, Adam, how</p> <p>12 much did you want? How much time for a break?</p> <p>13 MR. NADELHAFT: Well, Dr. Anderson, how</p> <p>14 much time do you need?</p> <p>15 THE WITNESS: I don't care.</p> <p>16 MR. NADELHAFT: Ten minutes.</p> <p>17 MS. BIRTJA: Okay. So that would be</p> <p>18 coming back at 11:11 PST time. Three hours ahead,</p> <p>19 what is that, 2:11 your time?</p> <p>20 MR. NADELHAFT: Works for me.</p> <p>21 THE VIDEOGRAPHER: And we are total time</p> <p>22 one hour one minute. Off record, 2:01.</p>
<p style="text-align: right;">66</p> <p>1 going to –</p> <p>2 MS. BIRTJA: Don't go too -- I'm just</p> <p>3 going to cut you off. Don't go too much in the</p> <p>4 back history. They haven't released that. But</p> <p>5 answer the question: You said there are two</p> <p>6 points. What was the second one beyond the point</p> <p>7 of pride?</p> <p>8 THE WITNESS: And the second -- the second</p> <p>9 one is what she reported to me, which is: If he</p> <p>10 was going to leave her to de-escalate from the</p> <p>11 fight, she would strike him to keep him there.</p> <p>12 She would rather be in a fight than have him</p> <p>13 leave.</p> <p>14 Q Do you recall in your -- in your meetings</p> <p>15 with Amber and Mr. Depp, how it was reported who</p> <p>16 had -- who hit somebody first, the first time</p> <p>17 somebody hit somebody in their relationship?</p> <p>18 MR. CHEW: Objection; vague, ambiguous,</p> <p>19 calls for expert opinion.</p> <p>20 MS. BIRTJA: Vague as to time to the</p> <p>21 extent you're just asking what she recalled or</p> <p>22 what was told to her.</p>	<p style="text-align: right;">68</p> <p>1 (Recess was held.)</p> <p>2 THE VIDEOGRAPHER: On record, 2:12.</p> <p>3 MR. NADELHAFT: Thank you. Welcome back</p> <p>4 after the short break. And just for the record, I</p> <p>5 believe Sam -- Ben Chew had said he was with</p> <p>6 Jessica Meyers. I think Camille Vasquez, Andrew</p> <p>7 Crawford, and Sam Moniz is also here for the</p> <p>8 deposition on behalf of Mr. Depp.</p> <p>9 Is that right, Ben?</p> <p>10 MR. CHEW: It's possible. I don't know.</p> <p>11 I heard Sam identify himself.</p> <p>12 MR. NADELHAFT: Okay. There's two more</p> <p>13 boxes that show Camille and Andrew.</p> <p>14 MR. CHEW: Then that's probably who they</p> <p>15 are.</p> <p>16 MR. NADELHAFT: Okay. Perfect.</p> <p>17 BY MR. NADELHAFT:</p> <p>18 Q Dr. Anderson, in working with Amber and</p> <p>19 Mr. Depp, did -- I'm not looking for what you</p> <p>20 said, if anything -- did you speak to any other</p> <p>21 doctors or psychologists that worked with either</p> <p>22 Amber or Mr. Depp?</p>

<p style="text-align: right;">69</p> <p>1 A No.</p> <p>2 Q Did you review any medical documents of</p> <p>3 Mr. Depp or Amber?</p> <p>4 A I reviewed a pharmacokinetic that</p> <p>5 Ms. Amber Heard showed me which has to do with</p> <p>6 neurotransmitter function, genetics, and</p> <p>7 medications.</p> <p>8 MR. NADELHAFT: All right. I appreciate</p> <p>9 your time. Thank you. I have nothing further at</p> <p>10 this time.</p> <p>11 EXAMINATION</p> <p>12 BY MR. CHEW:</p> <p>13 Q Good afternoon -- or I guess it's still</p> <p>14 morning for you, Dr. Anderson. Nice to see you.</p> <p>15 Thank you for being here. I'll try not to keep</p> <p>16 you any longer than is necessary.</p> <p>17 I have the honor of representing Johnny</p> <p>18 Depp, and I have some -- a few questions following</p> <p>19 up on Mr. Nadelhaft's examination and also some of</p> <p>20 my own.</p> <p>21 Just to go back, Doctor, what professional</p> <p>22 degrees do you hold?</p>	<p style="text-align: right;">71</p> <p>1 you obtained your Ph.D.?</p> <p>2 A Yes. I got it in '82.</p> <p>3 Q And very briefly, if you could just,</p> <p>4 please, in summary fashion, just describe your</p> <p>5 employment history from 1982 forward after earning</p> <p>6 your Ph.D.</p> <p>7 A I collected clinical hours in hospitals</p> <p>8 and in psychiatric medical groups. I was employed</p> <p>9 to do some nutrition evaluation and intervention</p> <p>10 as well, but there were M.D.s behind me. We</p> <p>11 worked in concert.</p> <p>12 Then worked in a hospital with -- I</p> <p>13 think -- I think that doctor was re- -- was</p> <p>14 workers' comp. And then when I was -- you know, I</p> <p>15 have it out of order. Then I was on my own, but I</p> <p>16 was employed by -- this is when I was employed by</p> <p>17 a psychiatric medical group to do kind of a</p> <p>18 combination of psychotherapy and some nutrition.</p> <p>19 And then since then I have been a solo</p> <p>20 practitioner, out of network, word-of-mouth only,</p> <p>21 very small footprint, purposely, all of these</p> <p>22 years.</p>
<p style="text-align: right;">70</p> <p>1 A I have a -- I have a couple of master's, a</p> <p>2 Ph.D., and a certified clinical in nutrition</p> <p>3 certification.</p> <p>4 Q Would you mind, please, just elaborating</p> <p>5 on that for the record.</p> <p>6 A Yes. I have a master's from young -- in</p> <p>7 my -- early in my life in teaching and curriculum.</p> <p>8 I have a master's in psych. I have a Ph.D. in</p> <p>9 clinical psychology. I have a CCN, which is a</p> <p>10 Certified Clinical Nutrition Certification.</p> <p>11 Q Well, that's very impressive.</p> <p>12 From what institutions did you receive</p> <p>13 your master's degree?</p> <p>14 A The first one was from the University of</p> <p>15 Rochester, New York. The second was from</p> <p>16 California School of Professional Psychology, and</p> <p>17 the Ph.D., later to be merged with Alliant</p> <p>18 university.</p> <p>19 The CCN I can tell you is from the</p> <p>20 International & American Associations of Clinical</p> <p>21 Nutritionists.</p> <p>22 Q And do you recall, Doctor, in what year</p>	<p style="text-align: right;">72</p> <p>1 Q When did you become a solo practitioner?</p> <p>2 A Very soon. Probably in -- probably in</p> <p>3 '86.</p> <p>4 Q So is it fair to say that as of 2015 you</p> <p>5 were already quite established as a solo</p> <p>6 practitioner?</p> <p>7 A Yes.</p> <p>8 Q Where was -- you're now on Wilshire</p> <p>9 Boulevard; is that correct?</p> <p>10 A Yes.</p> <p>11 Q Where was your practice as of 2015?</p> <p>12 A The same place.</p> <p>13 Q Generally speaking, what type of services</p> <p>14 did you provide your patients in 2015?</p> <p>15 A Adults only, individual or couples work,</p> <p>16 and with a limited number of people. There would</p> <p>17 have been neurotransmitter testing and some</p> <p>18 attention to lifestyle and how nutritional</p> <p>19 elements affect the brain.</p> <p>20 Q I believe -- and correct me if I'm wrong,</p> <p>21 I believe in response to one of Mr. Nadelhaft's</p> <p>22 questions you described yourself as a clinical</p>

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<p>1 psychologist; is that correct? 2 A Yes. 3 Q And if you would just please describe for 4 us laypeople what a clinical psychologist does. 5 A The first thing is evaluation, intake, 6 gather material. 7 The second thing, in the way I work, is 8 con- -- during the intake process, could be one 9 session, could be four sessions, depends on if 10 it's an individual or a couple, I'm 11 conceptualizing. I'm looking for the process. 12 The content is something I make notes on, I care 13 about, it leads me from session to session. But 14 I'm really looking at process; what's going on 15 between two people or what's actually going on 16 inside of someone. 17 The third step is I'm -- I show my hand. 18 I talk about it. I try to get either three people 19 in the room all on the same page with me, or one 20 other person, this is what I see, and then the 21 onus is on me to not just be a good friend and 22 hold someone's hand and talk about Mom, but to</p>	<p>1 the session do you take the notes? 2 A I'm taking them during the session. And 3 they know it because I -- I don't want hours and 4 hours and hours of homework at the end of a 5 clinical day. So the notes are often, you know, a 6 lot of typos, wrong pronouns here and there. But 7 essentially, I'm just trying to gather facts as I 8 go. 9 Q Is it fair to say that you take the notes 10 in a somewhat contemporaneous fashion? 11 A Sure. 12 MR. NADELHAFT: Objection; form. 13 Q So if you had a session with a couple, you 14 wouldn't go back a week later and try to recreate 15 it out of whole cloth, would you? 16 A No. 17 MR. NADELHAFT: Objection; hypothetical. 18 THE WITNESS: You get me from one session 19 to the next. They are my notes for me and they're 20 probably more than most psychologists take. But I 21 do them because it -- it's effective for me to 22 know the content we talked about. And as I'm</p>
<p>1 actually make change. And so I lay out: Here are 2 the things I think we need to work on, and then 3 there are action steps for all of them so that 4 someone has a more directed sense of what they're 5 doing in psychotherapy as opposed to just coming 6 in and talking about how they feel. 7 MS. BIRTJA: And just a late objection. 8 That was more of an opinion question, an expert 9 question, especially as you phrased it as 10 explaining it to us laypeople, but more than a 11 factual question. But go ahead. She already 12 answered. 13 MR. CHEW: I apologize. I'll try to keep 14 it to a minimum. I just want to lay a little bit 15 of a predicate for the notes that I'm about to 16 show her that she produced. 17 BY MR. CHEW: 18 Q Is it your practice that when you have a 19 session with a couple that you take notes from the 20 session? 21 A I absolutely take notes from any session. 22 Q Do you take -- at what time in relation to</p>	<p>1 developing conceptual process kind of notes or 2 ideas, I'm going to write those down here and 3 there. 4 Q And do you take those notes in the 5 ordinary course of your practice in your business? 6 A Absolutely. 7 Q Do you maintain -- 8 MS. BIRTJA: Sorry. May call for a legal 9 conclusion. 10 Go ahead. 11 THE WITNESS: Oh, I don't know what -- 12 MS. BIRTJA: It's fine. You answered. 13 Go ahead. 14 Q Do you maintain or do you keep those notes 15 as part of your treatment and regular course -- 16 ordinary course of business? 17 A I do. 18 Q Do you share those with anyone else other 19 than your patients? 20 MR. NADELHAFT: Objection; form -- 21 MS. BIRTJA: Assumes facts not in 22 evidence --</p>

<p style="text-align: right;">77</p> <p>1 MR. NADELHAFT: -- assumes facts not in 2 evidence. 3 MS. BIRTJA: -- that she does share them. 4 But go ahead. 5 MR. CHEW: Oh, I'm -- 6 MR. NADELHAFT: Same objection. 7 MR. CHEW: I'm sorry, I didn't mean to 8 assume anything. 9 BY MR. CHEW: 10 Q Do you share your notes with anyone else? 11 A I would say there are two occasions. One 12 is deposition; one many years ago, this one. 13 And the second was many, many years ago 14 with my -- what's it called -- computer repair 15 person where there was someone, of name, that they 16 then came back to me and commented on. They had 17 read -- I think they had read the whole file. 18 MS. BIRTJA: I think the question, though, 19 is simply -- 20 THE WITNESS: Yes. 21 MS. BIRTJA: -- do you typically share 22 them with people you know unless there is</p>	<p style="text-align: right;">79</p> <p>1 abuse from a partner? 2 MS. BIRTJA: Well, it may be opinion 3 testimony and outside the scope since she's only 4 supposed to be here as a fact witness and no 5 opinion testimony. So anything beyond factual 6 testimony from Mr. and Mrs. Heard [sic] is 7 irrelevant and outside the scope of this depo 8 unless you guys are going to be willing to pay 9 her. 10 MR. CHEW: Okay. We'll table that for the 11 moment. Maybe discuss that among my colleagues 12 during a break. 13 BY MR. CHEW: 14 Q And there came a time when Amber Heard, 15 Ms. Heard, became your patient; is that correct? 16 MR. NADELHAFT: Objection; form and vague. 17 MS. BIRTJA: Object as to time and -- in 18 terms of the couple, that she and Mr. Depp became 19 her patients, correct, that's what you're asking? 20 MR. CHEW: Well, no, actually, you -- 21 that's -- thank you, Michelle, for clarifying. 22 Q Did Ms. Heard ever become your patient in</p>
<p style="text-align: right;">78</p> <p>1 extenuating circumstances? 2 THE WITNESS: No, no. These are mine and 3 mine alone. But yes, computer repair people or 4 deposition people have seen them, and that's it. 5 BY MR. CHEW: 6 Q Thank you. 7 And what type of information generally do 8 you keep in your notes other than what you've 9 already testified about? 10 MR. NADELHAFT: Objection; form, 11 hypothetical. 12 THE WITNESS: Whatever I want to. 13 Anything that come -- it could be content that I'm 14 tracking, just so I know in the next session what 15 kind of content we were talking about, and it 16 could be process, too. 17 Q Can you prescribe medication to your 18 patients? 19 A No. 20 Q Putting aside for a moment Mr. Depp and 21 Ms. Heard, have any of your other patients ever 22 told you that they were experiencing physical</p>	<p style="text-align: right;">80</p> <p>1 her individual capacity? 2 MS. BIRTJA: I'm going to object on HIPAA 3 that -- I do know from Adam's office they were 4 specifically told that she was only to allow 5 release information from the joint sessions in 6 2015 and 2016, and any individual sessions or 7 treatment was beyond the scope of the HIPAA 8 release. So based on their limiting and their 9 refusing to release it and based on the law in 10 California that mental health records can only be 11 released via authorization or court order and not 12 just subpoena, I'll instruct her not to answer to 13 any individual therapy not part of the couples 14 therapy. As I do understand in 2015/2016 she saw 15 both individuals as part of the couples therapy. 16 But any individual session solely as to Ms. Heard, 17 I'm going to instruct her not to answer based on 18 the HIPAA authorization expressly not releasing 19 that information. 20 MR. CHEW: No, I appreciate that, 21 Michelle. And while we're on the topic, I believe 22 you testified that one of Ms. Heard's attorneys,</p>

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<p style="text-align: right;">81</p> <p>1 Michael Dailey, gave instructions about what 2 information that you were allowed to disclose. If 3 you could share us with that -- share that with 4 us, I'd appreciate it. 5 MS. BIRTJA: Well, first off, I'm not the 6 witness here so I'm not testifying or offering any 7 testimony here. I'm simply -- from a legal 8 standpoint, we have a limited release from 9 Ms. Heard which expressly states -- and if you let 10 me minimize my screen so I can read it -- I, Amber 11 Heard, do hereby authorize you to testify and 12 release any documents and/or medical records you 13 have that relate solely to any medical and/or 14 psychological or counseling I received stemming 15 from any physical abuse I suffered from Johnny C. 16 Depp, II, from January 1, 2012 through May 31, 17 2016. These are the only treatment records 18 covered by this authorization release. 19 Based on that very limited language and my 20 discussions with Mr. Dailey, I redacted the 21 records to solely include information physically 22 -- limited to physical abuse. I pointed out to</p>	<p style="text-align: right;">83</p> <p>1 Court in Fairfax County has already ruled that 2 Ms. Heard has deliberately put her mental 3 condition at issue. Mr. Depp has not. The Court 4 has ruled that as well. And based on that, 5 these -- these instructions, which you had every 6 reason to follow, are outrageous. And we are 7 going to go to court in Fairfax County on an 8 emergency basis when we can to get the records. 9 But I don't want to -- in the meantime, I don't 10 want to -- 11 MR. NADELHAFT: Let me just -- and you're 12 going to have plenty of time to ask all your 13 questions, but let me just put on the record, 14 since you made representations about what Fairfax 15 court had said. 16 The HIPAA release is what the Fairfax 17 court authorized. You moved to compel other -- 18 you moved to compel past the HIPAA release. It 19 was denied. So they've done -- the HIPAA release 20 is the records that should be produced. We didn't 21 make any -- just to be clear, we gave instructions 22 as to what the HIPAA release was, and Michelle</p>
<p style="text-align: right;">82</p> <p>1 Mr. Dailey that the release was very subjective, 2 it was not very well worded, it was very hard to 3 interpret. And because they were being so limited 4 on it, I was overinclusive and under, so as to 5 avoid any HIPAA violations or claims, and that I 6 pointed out that these redactions would make the 7 records essentially unusable and incomprehensible. 8 But based on the law, and because these 9 were joint sessions, both patients would have to 10 fully release them in order for me to produce them 11 unredacted. And based on that information that 12 was received, and counsel, Mr. Dailey, confirming 13 that that was the limitations of the release, 14 those are the redactions made. 15 MR. CHEW: Now, Michelle, I really 16 appreciate your explanation, and you did exactly 17 the right thing. My quarrel, and it's a very 18 serious one, is with Mr. Dailey. The purported 19 limitations he's done and these outrageous 20 redactions have compromised our ability to depose 21 your client. 22 You have no way of knowing this, but the</p>	<p style="text-align: right;">84</p> <p>1 decided what to redact and what not to redact. We 2 made no redactions on our own. But we did have 3 discussions as to what the HIPAA release was based 4 on what was authorized and ordered by the Court, 5 which is consistent with the court order. 6 MR. CHEW: Mr. Dailey clearly gave 7 improper instructions which Michelle 8 understandably followed. 9 MR. NADELHAFT: I don't believe -- just to 10 be clear, we can say that we disagree. I think it 11 was -- the instructions were the correct 12 instructions. But go ahead. 13 MR. CHEW: Okay. Well, let's go back. 14 MS. BIRTJA: Just to clarify, I'm not 15 taking the position one way or the other what the 16 Court has or has not ordered. All I'm simply 17 saying is I was given an authorization that is 18 limited. 19 MR. NADELHAFT: Right. 20 MS. BIRTJA: And based on the limits of 21 that authorization, to the best of my ability, I 22 redacted the records. It was explained to</p>

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<p style="text-align: right;">85</p> <p>1 Mr. Dailey that it is impossible to somewhat call 2 out specific things, the substance abuse, and not 3 keep the context of the whole conversation in the 4 process notes and that it was a very hard call to 5 make. 6 I pointed out that I was hoping this issue 7 could be resolved between counsel before the 8 deposition because my biggest fear here is that my 9 client will then be drawn back into another 10 deposition out of her professional time, which, 11 again, none of the parties are willing to pay for, 12 which I still think is improper, and she's only 13 here today because she simply wanted to put this 14 behind her and not have further disputes about it. 15 I also don't know -- and it's not really 16 my care what you bring this up -- but we're here 17 pursuant to a California subpoena, not a Virginia 18 subpoena or a Fairfax County subpoena. 19 MR. CHEW: That's correct. 20 MS. BIRTJA: I think if we're appearing 21 and making any motions, it would be in the 22 California court, because I'm not sure the</p>	<p style="text-align: right;">87</p> <p>1 Mr. Nadelhaft showed the witness may have redacted 2 out certain personal identifiers. 3 AV TECHNICIAN: Stand by. And I'll mark 4 that as Plaintiff's Exhibit No. 1. 5 (Plaintiff's 1, March 18 and 19, 2015 6 e-mail chain between Carino, Anderson, and Heard, 7 Bates No. CC000169, was marked for identification 8 and is attached to the transcript.) 9 AV TECHNICIAN: Showing Exhibit 1 on the 10 screen. 11 MR. NADELHAFT: Ben, just so we're all 12 clear, do you want this to be Plaintiff's 13 Exhibit 1, or do you want -- 14 MR. CHEW: Yeah, absolutely. We're not 15 changing our numbering. 16 MR. NADELHAFT: Okay. I'm not -- that's 17 fine. You don't need to be argumentative. That's 18 all I was asking. That's fine. 19 MR. CHEW: You asked me and I said, No, 20 we're going to keep our numbering. 21 MR. NADELHAFT: Okay. That's fine. 22 MR. CHEW: Thank you.</p>
<p style="text-align: right;">86</p> <p>1 Virginia court has standing and authority to 2 enforce the California subpoena that was served by 3 the Gordon Rees firm, which my understanding, is 4 local counsel in California for this case. 5 But, again, I'm not holding anyone to any 6 position that they're saying about what the Court 7 has done. I don't have the benefit of knowing 8 that. I'm simply saying, based on the release I 9 have for Ms. Heard, it's a limited release, not an 10 unlimited release. Mr. Depp's was an unlimited 11 release. But in fairness, I redacted it to 12 equally protect both and limit it to simply topics 13 and quotations regarding abuse as -- in 2015 and 14 2016 as per the release. 15 MR. CHEW: Thank you very much. 16 MR. NADELHAFT: I appreciate that. 17 MR. CHEW: Let's go to the exhibits and 18 we'll do what we can. 19 If Lucien can please call up what we have 20 marked as Plaintiff's Exhibit 1, which is a slight 21 variation on Anderson 3. It's just a different 22 Bates number, I think, of the version that</p>	<p style="text-align: right;">88</p> <p>1 MR. NADELHAFT: Uh-hum. 2 BY MR. CHEW: 3 Q I'm not going to repeat the questions 4 Mr. Nadelhaft asked you, so I'm just going to -- 5 this may be a little disjointed. I'll try to just 6 ask you the ones he did not ask you. 7 First of all, have you -- just to confirm, 8 have you seen this document before, Dr. Anderson? 9 A Yes. 10 Q And what is it? 11 A It's a -- Christian Carino doing the first 12 contact, and the second one is from Mr. Heard 13 wanting to know how to get in touch with me. 14 Q And just directing your attention to the 15 e-mail at the very top of the page from Ms. Heard 16 to you, which you have already identified, she 17 writes: so I was hoping that perhaps I could give 18 you a call and maybe see if there is a way to 19 commence some sort of process with you. 20 Did Ms. Heard ever tell you what kind of 21 process she wanted to commence with you? 22 MR. CHEW: Objection; form --</p>

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<p style="text-align: right;">89</p> <p>1 MS. BIRTJA: May call for speculation, 2 lacks foundation. 3 MR. NADELHAFT: Objection; form, hearsay. 4 MS. BIRTJA: To the extent you know or 5 recall, you can go ahead, Dr. Anderson. 6 THE WITNESS: I'm confused because this 7 says March of 2015. 8 BY MR. CHEW: 9 Q Yes. 10 A I don't have anything in my notes or in my 11 ledger for anything in March of '15. 12 Q Okay. We can -- we can move on. 13 And I'm actually going to go through your 14 notes. Mr. Nadelhaft did not, but I will do that, 15 and I think that will clarify certain things. 16 When was your first therapy session with 17 Ms. Heard? 18 MS. BIRTJA: As part of the joint session 19 or ever? Because, again, based on the 20 authorization, she can't testify as to any 21 individual therapy outside the confines of doing 22 joint therapy.</p>	<p style="text-align: right;">91</p> <p>1 Q And was that the first time you had ever 2 met Mr. Depp in person? 3 A Yes. 4 Q Okay. Now, if you could please turn -- 5 and this is a multipage exhibit Mr. Nadelhaft did 6 not show you. 7 MR. CHEW: This is going to be Plaintiff's 8 Exhibit 2. 9 AV TECHNICIAN: Stand by. 10 (Plaintiff's 2, Dr. Anderson's redacted 11 notes, was marked for identification and is 12 attached to the transcript.) 13 Q And, Dr. Anderson, if you -- just take as 14 long as you would like to familiarize yourself 15 with this document. I'll just state for the 16 record these are documents that you produced that 17 have a Bates designation 1 through 17. 18 A Yes, I'm familiar. 19 Q What are these? Well, strike that. 20 Have you ever seen Plaintiff's Exhibit 2 21 before? 22 A Yes.</p>
<p style="text-align: right;">90</p> <p>1 MR. CHEW: And, again, for the record, we 2 think that's improper. 3 Q But accepting what's been thrust upon us, 4 when was your first couples therapy involving 5 Ms. Heard? 6 A October 1, 2015. 7 Q Was that an in-person session? 8 MR. NADELHAFT: Objection; asked and 9 answered. 10 THE WITNESS: Yes. 11 Q Where was the session held? 12 A In my office. 13 Q And Mr. Depp was also there, correct? 14 A Yes. 15 Q How long was that first session? 16 MR. NADELHAFT: Objection; asked and 17 answered. 18 Go ahead. 19 THE WITNESS: 3 1/2 hours. 20 Q Was that the first time that you had ever 21 met Ms. Heard in person? 22 A I think so.</p>	<p style="text-align: right;">92</p> <p>1 Q What is it? 2 A It's a redacted copy of my personal notes 3 that I provided to you guys. 4 Q And are these -- I think you testified in 5 response to Mr. Nadelhaft's questioning that the 6 names Ann Henry and Joey Davis are pseudonyms. 7 A Yes. 8 Q And would you please just identify for us 9 who Ann Henry is in real life. 10 A Ann Henry is Amber Heard. Joey Davis is 11 Johnny Depp. 12 Q And are these your notes that you took 13 contemporaneously of the -- for couples -- strike 14 that. 15 Are these your contemporaneous notes that 16 you took of the couples therapy sessions? 17 A Yes. 18 Q Do they contain notes of the individual 19 sessions or not? 20 MS. BIRTJA: Vague and ambiguous. 21 Individual sessions, i.e., within the couples 22 where she saw them independently, or individual</p>

<p style="text-align: right;">93</p> <p>1 sessions where she saw Ms. Heard by herself only?</p> <p>2 MR. NADELHAFT: Same objection.</p> <p>3 MR. CHEW: That's a good objection. Let</p> <p>4 me break it down before Adam joins the objection.</p> <p>5 Q Would these notes include any session that</p> <p>6 you had for Ms. Heard that was not part of the</p> <p>7 couples therapy?</p> <p>8 A No.</p> <p>9 Q Did you have any sessions with Mr. Depp</p> <p>10 individually that weren't part of the couples</p> <p>11 therapy?</p> <p>12 A No. During this period of time -- it's</p> <p>13 color-coded. Black is couples, red is Ms. Heard,</p> <p>14 and blue is Mr. Depp. Whether I talked to them or</p> <p>15 saw them individually or as a couple, it was all</p> <p>16 in service of couples therapy.</p> <p>17 Q Understood. And so these notes in</p> <p>18 Plaintiff's Exhibit 2 encompass all of the couples</p> <p>19 therapy sessions that you had with Mr. Depp and</p> <p>20 Ms. Heard either when they appeared together or</p> <p>21 when they appeared separately in the context of</p> <p>22 your couples therapy; is that correct?</p>	<p style="text-align: right;">95</p> <p>1 Go ahead.</p> <p>2 THE WITNESS: Yes.</p> <p>3 Q Did you maintain or keep them in the</p> <p>4 ordinary course of your practice or business?</p> <p>5 MS. BIRTJA: And may call for a legal</p> <p>6 conclusion and asked and answered.</p> <p>7 Go ahead.</p> <p>8 MR. NADELHAFT: Objection; form, leading.</p> <p>9 Go ahead.</p> <p>10 THE WITNESS: I did.</p> <p>11 Q And this may -- again, I -- I have some</p> <p>12 understanding, but I have to ask you as the</p> <p>13 witness. Michelle said, quite correctly, she's</p> <p>14 not the witness here, so I'm just going to have to</p> <p>15 ask for your understanding. And if it requires</p> <p>16 you to disclose communications with Michelle, then</p> <p>17 she will tell you not to answer.</p> <p>18 Do you see in the course of Plaintiff's</p> <p>19 Exhibit 2 a vast amount of your notes that appears</p> <p>20 to be blacked out or redacted?</p> <p>21 A I do.</p> <p>22 Q Did you black out or redact those notes or</p>
<p style="text-align: right;">94</p> <p>1 A I'm looking at one page. If you're</p> <p>2 talking about the entire redacted document, yes.</p> <p>3 Q Okay.</p> <p>4 A I don't see the whole document in front of</p> <p>5 me.</p> <p>6 MS. BIRTJA: And I'll just note, Ms. --</p> <p>7 Dr. Anderson, at the top you see it says 1 of 17,</p> <p>8 so it is the 17 pages. They haven't scrolled</p> <p>9 through all 17 --</p> <p>10 THE WITNESS: Okay.</p> <p>11 MS. BIRTJA: -- but it does appear to be</p> <p>12 the 17-page redacted document we produced.</p> <p>13 THE WITNESS: Okay. Then yes.</p> <p>14 Q And I've asked you the question generally,</p> <p>15 but I want to ask you in the context of these 17</p> <p>16 pages. Did you prepare these 17 pages of couples</p> <p>17 therapy notes in the ordinary course of your</p> <p>18 treatment of Mr. Depp and Ms. Heard?</p> <p>19 MS. BIRTJA: May call for a legal</p> <p>20 conclusion.</p> <p>21 Go ahead.</p> <p>22 MR. NADELHAFT: Objection; form.</p>	<p style="text-align: right;">96</p> <p>1 did someone else do it?</p> <p>2 MS. BIRTJA: May call for attorney-client</p> <p>3 privilege. I will represent she did not make the</p> <p>4 decisions on the redacting; I did. And since she</p> <p>5 didn't do it, she wouldn't know.</p> <p>6 MR. CHEW: Understood. And you've already</p> <p>7 explained why, and that's going to be something</p> <p>8 taken up by Judge Bowick or Chief Judge Azcarate.</p> <p>9 Okay.</p> <p>10 Q Let's direct your attention, please -- and</p> <p>11 these appear to go in order, so we'll start on the</p> <p>12 first page. There is a notation October 1, '15.</p> <p>13 Do you have any understanding of what that</p> <p>14 means?</p> <p>15 A Yes, because I have my full notes next to</p> <p>16 these and I know the context.</p> <p>17 They were each describing --</p> <p>18 MS. BIRTJA: Wait, wait, wait.</p> <p>19 THE WITNESS: Yes.</p> <p>20 MS. BIRTJA: Before you answer, is there</p> <p>21 any objection if she puts the context which goes</p> <p>22 beyond what's been redacted and potentially what's</p>

97	<p>1 in the release, Adam?</p> <p>2 MR. NADELHAFT: You're asking -- you're</p> <p>3 asking, as I'm assuming -- if it's --</p> <p>4 MS. BIRTJA: Everything that --</p> <p>5 (Simultaneous crosstalk.)</p> <p>6 MR. NADELHAFT: Yes, I'm -- if it's just</p> <p>7 saying who was at the meeting or what this meeting</p> <p>8 was, I have no objection to that. She can answer</p> <p>9 that question.</p> <p>10 MS. BIRTJA: But if the context goes</p> <p>11 beyond that to past diagnosis, past treatment,</p> <p>12 things in their life that create the context, that</p> <p>13 goes beyond your release.</p> <p>14 MR. NADELHAFT: Well, also, I would think</p> <p>15 it goes beyond your -- you said she's not going to</p> <p>16 give any testimony as to diagnosis or anything</p> <p>17 like that, so it would be multiple reasons.</p> <p>18 MR. CHEW: Well, why don't we do it -- you</p> <p>19 know, you're trying to make me do this with my</p> <p>20 hands tied behind my back, so I'm going to ask the</p> <p>21 questions. And I am going to ask what's in the</p> <p>22 redacted areas, and if she can't answer because</p>	99	<p>1 different voice more about the process between</p> <p>2 them where she has, I believe, interrupted him, he</p> <p>3 says no more about what she says about him, and</p> <p>4 it's just that they're fighting and she has a hard</p> <p>5 time -- she bites the bait. She can't let him</p> <p>6 talk, is my recollection. And from this -- that's</p> <p>7 kind of what that is. So it gives me a sense of</p> <p>8 what they're doing at home. They're each</p> <p>9 reporting: This is what we say to each other.</p> <p>10 Q Okay. I appreciate that, Dr. Anderson.</p> <p>11 I'm just going to try to break it down into little</p> <p>12 bits. So October 1, 2015 is the date of the first</p> <p>13 couples session, correct?</p> <p>14 A Yes.</p> <p>15 Q And 2 1/2 means 2 1/2 hours long from</p> <p>16 start to finish?</p> <p>17 MR. NADELHAFT: Objection; asked and</p> <p>18 answered.</p> <p>19 Go ahead.</p> <p>20 THE WITNESS: I am guessing they were</p> <p>21 in -- they were present for 2 1/2 hours, but that</p> <p>22 I waited, whatever, the first doc- -- the ledger</p>
98	<p>1 they're redacted, we'll just have that, we'll need</p> <p>2 to make a record.</p> <p>3 BY MR. CHEW:</p> <p>4 Q So my question was: What is the</p> <p>5 significance of October 1, 2015?</p> <p>6 A I'm going to look at what I'm reading so</p> <p>7 that this makes sense to you. This can't possibly</p> <p>8 make sense, but it makes sense to me.</p> <p>9 Q Okay.</p> <p>10 A They reported what they said to one</p> <p>11 another. So the first line is Ms. Heard talking,</p> <p>12 saying that Mr. Depp says to her, No one likes</p> <p>13 you, you're getting fame from me, I'm falling out</p> <p>14 of love with you, you're a whore.</p> <p>15 She's reporting just -- in the first</p> <p>16 session just how bad the relationship is. Just</p> <p>17 how mean they are to one another.</p> <p>18 The second line is Mr. Depp starting to</p> <p>19 talk where he says she calls him a fat old man and</p> <p>20 hits him in the jaw.</p> <p>21 And at that point I -- because I'm typing</p> <p>22 quickly as they go along, I'm switching into a</p>	100	<p>1 says -- but I waited an hour for them to show up.</p> <p>2 Q And, Dr. Anderson, in that first bullet</p> <p>3 point that we can see, you write, J says: no one</p> <p>4 likes you, getting fame from me, falling out of</p> <p>5 love with you, whore.</p> <p>6 "J" is Johnny Depp?</p> <p>7 A Yes. But that was said by Ms. Heard.</p> <p>8 Q So is it fair to say that Ms. Heard was</p> <p>9 saying that Johnny said to her, no one likes you,</p> <p>10 you're getting fame from me, I'm falling out of</p> <p>11 love with you, whore? That would have come from</p> <p>12 Mr. Depp; is that correct?</p> <p>13 A Ms. Heard reported that that's what</p> <p>14 Mr. Depp said to her at their worst, yes.</p> <p>15 Q Understood.</p> <p>16 And then in the next bullet point it says,</p> <p>17 A says: fat old man.</p> <p>18 "A" is Amber; is that correct?</p> <p>19 A Yes.</p> <p>20 Q Was this --</p> <p>21 MR. NADELHAFT: Objection;</p> <p>22 mischaracterizes the document.</p>

<p style="text-align: right;">101</p> <p>1 Go ahead.</p> <p>2 BY MR. CHEW:</p> <p>3 Q Was this Mr. Depp reporting that Amber</p> <p>4 called him a fat old man?</p> <p>5 MR. NADELHAFT: Objection; hearsay.</p> <p>6 MS. BIRTJA: You can go ahead. Is that</p> <p>7 what --</p> <p>8 THE WITNESS: Yes.</p> <p>9 MS. BIRTJA: -- that context is?</p> <p>10 I don't think they got your answer.</p> <p>11 THE WITNESS: Yes.</p> <p>12 MS. BIRTJA: Okay.</p> <p>13 Q And then you write: hits him in jaw.</p> <p>14 What did you mean by that?</p> <p>15 MR. NADELHAFT: Objection; hearsay.</p> <p>16 THE WITNESS: It's all hearsay. I'm</p> <p>17 listen- -- I'm writing what they're reporting to</p> <p>18 me. I wasn't there. He --</p> <p>19 Q No, I understand it, and I will confirm</p> <p>20 that later.</p> <p>21 But was this Mr. Depp reporting to you</p> <p>22 that Amber had hit him in the jaw?</p>	<p style="text-align: right;">103</p> <p>1 you know, when any of the attorneys object to</p> <p>2 hearsay or anything, they have to to preserve it</p> <p>3 for the record. So even if you understand that it</p> <p>4 is, they still have to put it on the record just</p> <p>5 to preserve it for later. So don't get frustrated</p> <p>6 by that or anything along those lines. They have</p> <p>7 to put it on the record or waive it, potentially,</p> <p>8 later.</p> <p>9 THE WITNESS: Okay.</p> <p>10 BY MR. CHEW:</p> <p>11 Q When you wrote: Bites the bait --</p> <p>12 Do you see that?</p> <p>13 A Uh-huh.</p> <p>14 Q -- what did you mean by that?</p> <p>15 MR. NADELHAFT: Objection; calls for</p> <p>16 expert testimony.</p> <p>17 MR. CHEW: No, it doesn't. I'm just --</p> <p>18 I'm asking her what she meant by that.</p> <p>19 MS. BIRTJA: But it may be a clinical</p> <p>20 analysis and opinion.</p> <p>21 But go ahead.</p> <p>22 THE WITNESS: Well, I'm looking at it</p>
<p style="text-align: right;">102</p> <p>1 A Yes.</p> <p>2 MR. NADELHAFT: Objection; hearsay.</p> <p>3 Q Did Amber, when he -- when Mr. Depp told</p> <p>4 you that Amber had hit him in the jaw, did Amber</p> <p>5 respond in any way? Did she deny it? Did she</p> <p>6 admit it?</p> <p>7 MR. NADELHAFT: Objection; form, leading</p> <p>8 hearsay.</p> <p>9 MS. BIRTJA: You can go ahead to the</p> <p>10 extent you recall.</p> <p>11 THE WITNESS: I don't think she denied it,</p> <p>12 but what I believe from my notes was that they</p> <p>13 galloped -- she galloped off in a new direction</p> <p>14 and they continued to talk and there was no more</p> <p>15 that Johnny Depp was going to say about what he</p> <p>16 was reporting. It was more that they started into</p> <p>17 a fight.</p> <p>18 And I wrote that their process is a back-</p> <p>19 and-forth firing at each other; at that point he</p> <p>20 had some energy. And they don't communicate.</p> <p>21 They had terrible skills.</p> <p>22 MS. BIRTJA: And, Dr. Anderson, just so</p>	<p style="text-align: right;">104</p> <p>1 seven years later. But what I believe is she had</p> <p>2 a hard time tolerating his talking, and she would</p> <p>3 jump in, and if he said something about her, she</p> <p>4 would bite the bait and then start either -- you</p> <p>5 know, saying her position, really.</p> <p>6 BY MR. CHEW:</p> <p>7 Q Did she interrupt him during this first</p> <p>8 session?</p> <p>9 MS. BIRTJA: At this -- in this point or</p> <p>10 ever during the session? Vague as to time.</p> <p>11 MR. NADELHAFT: Join.</p> <p>12 Q At any point during the first session, did</p> <p>13 Ms. Heard interrupt Mr. Depp when he was trying to</p> <p>14 talk?</p> <p>15 A Absolu- --</p> <p>16 MR. NADELHAFT: Objection; form.</p> <p>17 Go ahead.</p> <p>18 Form.</p> <p>19 Go ahead.</p> <p>20 THE WITNESS: Yes. She talked over him.</p> <p>21 She had rapid-fire talking.</p> <p>22 Q Did she interrupt him during your other</p>

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<p style="text-align: right;">105</p> <p>1 sessions that are reflected in Plaintiff's 2 Exhibit 2? 3 MR. NADELHAFT: Objection; leading, form. 4 You can answer. 5 MS. BIRTJA: To the extent you can recall, 6 go ahead. 7 THE WITNESS: Yes. And I pointed out the 8 process to her at some point, and she got it, that 9 she -- that no one could actually have a decent 10 dialogue with her if she was rapid-firing and 11 talking over and just barraging. It was a process 12 issue. 13 Q You write: Doesn't answer directly when 14 he asks her a question. 15 To what were you referring there? 16 A Don't have a clue. 17 Q Okay. And just going down to the bottom 18 of the first page of Exhibit 2, there's just one 19 word that is unredacted, and the word is: 20 Fighting. 21 A I think it leads to the next page, doesn't 22 it?</p>	<p style="text-align: right;">107</p> <p>1 thoughts I have. 2 Q Can you describe for us what "plan" means 3 without looking at the redacted material? 4 A Without looking at redacted? Yeah, "plan" 5 is my thinking to myself. Where do I want to go? 6 Q Okay. All right. 7 A What am I worried about? 8 Q If I could direct your attention further 9 down the page from "plan," you see the notation to 10 October 6, 2015? 11 A Yes. 12 Q Was that the second couples session? 13 A No. It's red; it's Amber alone. 14 Q Okay. I don't have the color version, but 15 I see it on the screen. 16 And -- 17 MS. BIRTJA: To clarify too, Ben -- it may 18 help -- it says, A versus -- 19 MR. CHEW: Got you, got you. 20 MS. BIRTJA: -- beyond the color. 21 Q So is it fair to say you met alone with 22 Amber for 2 1/3 hours in the context of the</p>
<p style="text-align: right;">106</p> <p>1 Q Oh, yes, Fighting plan. Oh. What did you 2 mean when you wrote: Fighting plan? 3 A What page do we go to? 4 Q We go to the second page. The only word 5 on that page is: Plan. 6 A I don't -- let me read. 7 Q And in fairness, I mean, there seems to be 8 a substantial amount of text that's redacted 9 between "fighting" and "plan," so I don't want 10 to -- 11 A No. I'm just looking at "fighting." 12 Because I have context here on the rest of my 13 notes. It's just their history. 14 Q Okay. And if you would please turn to the 15 second page of Plaintiff's Exhibit 2. The only 16 word on the page -- it's right up at the top -- 17 is: Plan. 18 Do you have any understanding of what that 19 means without the context? 20 A Well, I have -- these are just notes to 21 myself about what I think. But it's only a first 22 session, and it's just a few, you know, snips of</p>	<p style="text-align: right;">108</p> <p>1 couples therapy? Is that correct? 2 A Yes. This was to get her background 3 material. 4 Q Okay. And would you agree with me that 5 all of the text from your notes in this second 6 page of Exhibit 2 has been redacted out? 7 A Yes. 8 Q What was the -- 9 A No -- 10 Q -- substance? 11 A -- that's not -- that's not true. It's 12 not redacted on page 4. There's a very brief -- 13 if you scroll down, you'll see that the red 14 continues and there's a little bit at the end of 15 the -- 16 Q Yes. I may have misspoken. I meant to 17 say the rest of page 2. 18 But if we could just -- 19 MS. BIRTJA: Hold on a second. 20 Q -- because I'm just trying to make a 21 record. So is it fair to say that there was -- 22 the rest of the text in page 2 of your notes,</p>

<p style="text-align: right;">109</p> <p>1 Exhibit 2, has been redacted out completely? 2 A Yes. 3 Q And is the same thing -- is all of page 3 4 of Exhibit 2 redacted out? 5 A Yes. 6 Q And is the lion's share of page 4 of your 7 notes in Exhibit 2 redacted out except that little 8 snippet to which you just referred? 9 MR. NADELHAFT: Objection; form, vague. 10 THE WITNESS: Yes. 11 MR. NADELHAFT: You can answer. 12 MS. BIRTJA: Can we also have the -- 13 THE WITNESS: Yeah, move -- 14 MS. BIRTJA: -- move the screen to follow 15 along with this questioning? 16 THE WITNESS: Yes. 17 MR. CHEW: Yes. And I believe Lucien can 18 give you control of the exhibit if you want. 19 Otherwise, he can follow your instructions about 20 moving it forward. Whichever is easier for you. 21 THE WITNESS: There it is. 22 MR. CHEW: There it is. Okay.</p>	<p style="text-align: right;">111</p> <p>1 only thing in this clinical session that 2 apparently was about physical abuse or else it 3 would not have been redacted out. It's -- so when 4 she said in terms of physical abuse that he hits 5 her, a no-closed fist means an open hand slap, to 6 me, and she says that she hits back, and now she 7 starts it and sometimes hits him first because her 8 history is having been violated by her father, 9 physically, and just out of pride she -- if 10 she's -- a lot of things trigger her. And if 11 she's triggered, she would hit him first. 12 Q And the "he" you're referring to is Johnny 13 Depp, correct? 14 A Yes. 15 Q What did Ms. Heard tell you in the context 16 of the couples therapy about her father's physical 17 abuse of her as a child? 18 MS. BIRTJA: I'm going to say that's 19 outside the scope of what the release says. It 20 only allows us to testify and produce documents as 21 to the physical abuse from Johnny Depp that was 22 reported in the therapy sessions between 2015 and</p>
<p style="text-align: right;">110</p> <p>1 BY MR. CHEW: 2 Q So let me ask you: Is it fair to say that 3 everything above the words, He hits her - no 4 closed fist, she hits back and now starts it for 5 pride, her [sic] f hit her, everything else is 6 redacted? Is that correct? 7 A That's "because," not "her" but, yeah -- 8 Q Okay. 9 A -- everything is redacted out. That's 10 because father hit her. 11 Q And this little snippet is still part of 12 your notes from the October 6, 2015 session with 13 Ms. Heard only, correct? 14 A Yes. 15 Q So tell us what you mean in that one 16 section, he hits her - no closed fist, she hits 17 back and now starts it for pride, because -- 18 A -- father -- 19 Q -- hit her. 20 Would you please tell us what she meant by 21 that. 22 A This is her reporting to me. It's the</p>	<p style="text-align: right;">112</p> <p>1 2016. 2 And based on the limited authorization I 3 have now and the law in California that she has to 4 have the release and not just a subpoena, I'll 5 instruct her not to answer. 6 I understand the interest in it and where 7 it goes to that, but you guys need to work that 8 out between yourselves and either give us a 9 more -- a court order or a further release because 10 based on what we have, she legally can't answer 11 that. 12 BY MR. CHEW: 13 Q When you said that she sometimes hits 14 Johnny first because of pride, what did you mean? 15 MR. NADELHAFT: Objection; hearsay, form, 16 foundation. 17 MS. BIRTJA: It may have already been 18 answered, but go ahead. 19 THE WITNESS: She was sensitive to feeling 20 disrespected and a number of other things. But -- 21 and so -- and if she felt disrespected, she had 22 come out of her background history feeling that</p>

<p style="text-align: right;">113</p> <p>1 her pride needed to be -- needed to dominate and</p> <p>2 she needed to stand up for herself.</p> <p>3 BY MR. CHEW:</p> <p>4 Q So she was admitting to you that she</p> <p>5 sometimes initiated physically hitting Johnny</p> <p>6 Depp; is that correct?</p> <p>7 MR. NADELHAFT: Objection --</p> <p>8 THE WITNESS: Yes.</p> <p>9 MR. NADELHAFT: -- form, foundation,</p> <p>10 leading.</p> <p>11 MS. BIRTJA: You can go ahead.</p> <p>12 THE WITNESS: Yes.</p> <p>13 Q And when Ms. Heard told you that Johnny</p> <p>14 Depp hits her or slaps her, Johnny Depp was not</p> <p>15 present, correct?</p> <p>16 A Correct. And it wasn't plural. It was --</p> <p>17 she referred to -- well, I wrote "he hits her" --</p> <p>18 yes, so maybe it was plural.</p> <p>19 Q But he was not present when she made that</p> <p>20 assertion.</p> <p>21 A He was not.</p> <p>22 Q If we could please go to the next page,</p>	<p style="text-align: right;">115</p> <p>1 helpful.</p> <p>2 THE WITNESS: I'm sorry, what was the</p> <p>3 question?</p> <p>4 BY MR. CHEW:</p> <p>5 Q I'm going to ask a better question because</p> <p>6 I thought of a better way to phrase it.</p> <p>7 Did Ms. Heard tell you that she socked</p> <p>8 Mr. Depp?</p> <p>9 MR. NADELHAFT: Objection; hearsay,</p> <p>10 leading, form, foundation.</p> <p>11 THE WITNESS: Yes. She was describing</p> <p>12 kind of the progression of the physical violence,</p> <p>13 and that piece has been redacted out.</p> <p>14 Q When she told you that she "socks"</p> <p>15 Mr. Depp, does that mean hitting Mr. Depp with a</p> <p>16 fist?</p> <p>17 MR. NADELHAFT: Objection; form,</p> <p>18 foundation, speculation, hearsay.</p> <p>19 MS. BIRTJA: To the extent that's what was</p> <p>20 reported to you, explain what you meant when you</p> <p>21 used the word "socks."</p> <p>22 THE WITNESS: I believe I was using her</p>
<p style="text-align: right;">114</p> <p>1 Dr. Anderson, there is one snippet here on the top</p> <p>2 of the page that says, Fights they are hitting.</p> <p>3 No closed fist. When pushes is dangerous. Socks</p> <p>4 him.</p> <p>5 Is this entry still part of the October 6,</p> <p>6 '15 session with Ms. Heard only?</p> <p>7 A Yes.</p> <p>8 Q And what were you recording there?</p> <p>9 A I think it's just an extenuation of what</p> <p>10 she was talking about above. I don't think it</p> <p>11 adds anything new.</p> <p>12 Q And I'll just -- I'll leave it.</p> <p>13 But what does -- what did you mean when</p> <p>14 you -- when you wrote "socks him"?</p> <p>15 MR. NADELHAFT: Objection; form,</p> <p>16 foundation, hearsay.</p> <p>17 THE WITNESS: I need to read.</p> <p>18 MS. BIRTJA: And, Ben, just so you know, I</p> <p>19 did not redact the dates, so you can see when new</p> <p>20 sessions start. So everything in between the</p> <p>21 dates is one session.</p> <p>22 MR. CHEW: Excellent. That's very</p>	<p style="text-align: right;">116</p> <p>1 terminology.</p> <p>2 BY MR. CHEW:</p> <p>3 Q Did you have any understanding of what she</p> <p>4 meant when she admitted that she "socks" Mr. Depp?</p> <p>5 MR. NADELHAFT: Objection; form,</p> <p>6 foundation, speculation, hearsay.</p> <p>7 THE WITNESS: Yes. Because there were</p> <p>8 three lines above this that explained the</p> <p>9 progression a bit, and I've already said what it</p> <p>10 was. She felt she had to hit him back if he hit</p> <p>11 her, and so she always did. And...</p> <p>12 Q And, again, that entry is from a session</p> <p>13 where Mr. Depp was not physically present,</p> <p>14 correct?</p> <p>15 A That's right.</p> <p>16 Q Okay. Let's move to the next session,</p> <p>17 October 7, 2015. And this is a 3 1/2-hour</p> <p>18 session; is that correct?</p> <p>19 A Yes.</p> <p>20 Q Was that an in-person session?</p> <p>21 A Yes.</p> <p>22 Q Did both Mr. Depp and Ms. Heard attend?</p>

<p style="text-align: right;">117</p> <p>1 A No. This is blue. This is John -- 2 Mr. Depp's intake. 3 Q Okay. Good. Okay. I'm catching on. I'm 4 using a black-and-white version. 5 A I know. 6 MS. BIRTJA: On the top by the date, it 7 says J 2. That's the other way you can tell. It 8 says J only instead of J and A. 9 MR. CHEW: Got you. Thank you. 10 Q And so the next page, which is Bates 11 No. 6, is completely redacted; is that correct? 12 A Yes. 13 Q Okay. And now -- you were actually on the 14 page about which I was going to ask you because, 15 of course, it's -- it's actually got some -- some 16 text on it. 17 A Yes. 18 Q So directing your attention to the first 19 part of Bates No. 7, you write: The fighting and 20 heard her be shitty at him on a private plane -- 21 A From -- 22 Q -- from rocknrio in Brazil on way home.</p>	<p style="text-align: right;">119</p> <p>1 THE WITNESS: Yes. 2 BY MR. CHEW: 3 Q What did he say? 4 A Well -- 5 MR. NADELHAFT: Objection; hearsay. 6 THE WITNESS: They were flying home. She 7 was unhappy about something. I'm not sure what. 8 And she was rude, shitty, whatever, to him, and he 9 didn't like it, and he taped it. He wanted -- I 10 think he wanted evidence of how she could behave 11 toward him, and that she found out. 12 Q Did he ever tell you that she hit him on 13 that plane? 14 MR. NADELHAFT: Objection; hearsay. 15 THE WITNESS: No. 16 MS. BIRTJA: I don't think we got your 17 answer. 18 THE WITNESS: No. This was not about that 19 at all. 20 Q Did he say that he hit her on the plane? 21 MR. NADELHAFT: Objection; hearsay. 22 THE WITNESS: No.</p>
<p style="text-align: right;">118</p> <p>1 So these are words that came -- were said 2 to you by Mr. Depp, correct? 3 MR. NADELHAFT: Objection; hearsay, form, 4 foundation. 5 THE WITNESS: Yes. But the -- just the 6 couple of words beforehand actually explains what 7 those are. I don't think this makes any sense the 8 way it is. 9 Q Can you explain that to us in context 10 since we can't see it. 11 A Yes. Mr. Depp had taped a fight between 12 himself and Ms. Heard, and she was embarrassed 13 that a friend of theirs had either seen the tape 14 or seen her behavior, and she was very upset. And 15 they were -- it had something to do with coming 16 home on the plane from the Rock in Rio. 17 Q Did he explain what he meant when -- 18 A About? 19 Q -- about her being shitty to him on the 20 plane? 21 MR. NADELHAFT: Objection; form, 22 foundation, hearsay.</p>	<p style="text-align: right;">120</p> <p>1 BY MR. CHEW: 2 Q Okay. Let's go to the next entry. It 3 says, She yelling, aggressive, says not 4 aggressive. Your babyiness. 5 What was -- what did Johnny tell you? 6 MR. NADELHAFT: Objection; hearsay, form, 7 foundation, speculation. 8 THE WITNESS: From the couple of other 9 words, I think she was defending herself because 10 she was embarrassed that the third party had seen 11 a tape of how she was behaving and she was trying 12 to talk it down. 13 Q Okay. Then it says, He tries at 14 deescalate, says he can't do this, won't do it, 15 threatens relationship divorce. She more upset. 16 What were you referring to there? 17 MR. NADELHAFT: Objection; form, 18 foundation, hearsay, speculation. 19 THE WITNESS: He was telling me that I -- 20 I don't know if this was when he was on the plane 21 or if this is just in general. But he's saying, 22 in general, he tries to de-escalate, and he's</p>

<p style="text-align: right;">121</p> <p>1 saying I can't do this sort of relationship. I 2 won't do it. And then I think he's now referring 3 to having threatened the -- threatened to divorce 4 her, yes, and that triggers her terribly. And 5 then she got more upset. 6 And I think the rest is her just trying to 7 reframe that what happened didn't really happen 8 and wanting to be close again. 9 BY MR. CHEW: 10 Q And this is all still relating to this 11 session with Johnny alone; is that correct? 12 A He's reporting his experience of being 13 with her and how he found it to be difficult and 14 he -- and -- yes. 15 Q Okay. Okay. And let's -- if you don't 16 mind, if we could go to the next page, Bates 17 No. 8. And I'd like to ask you about the last 18 snippet where -- right there. It says, Don't know 19 how to de escalate. Need to stop for now, take a 20 break, have time away from the fight. Owe a 21 different kind of communication. 22 And this is still part of your solo</p>	<p style="text-align: right;">123</p> <p>1 they don't know now to de-escalate, and they don't 2 know how to talk with one another. 3 And in intake you see a vast variety of 4 what people are capable of doing. So this is my 5 note to myself, Oh, my God, they can't talk, even. 6 BY MR. CHEW: 7 Q Understood. 8 And let's move now toward the bottom of 9 the page. And I think I'm finally getting the 10 code right. So the next session occurred on 11 October 14, 2015, and it was the two of them for 12 three hours; is that correct? 13 A Yes. 14 Q And that was another in-person session, 15 true? 16 A Yes. 17 Q And am I right to say that every single 18 piece of your notes as to the October 14, 2015 19 session has been redacted? Is that true? 20 A Yes. But I -- to clarify something 21 earlier on the ledger -- 22 Q Yes.</p>
<p style="text-align: right;">122</p> <p>1 meeting with Mr. Depp? 2 A Yes. I think that's my -- just my note to 3 myself. 4 Q And what -- what did you mean there? 5 MR. NADELHAFT: Objection; speculation. 6 MS. BIRTJA: And may call, actually, for a 7 clinical opinion in her conclusion. It may go to 8 a diagnosis and a treatment plan which would go 9 beyond fact witness into her opinion testimony, 10 which, again, you've all said you don't want to 11 pay for. 12 But go ahead. 13 THE WITNESS: I think this -- the last 14 line -- well, the first line is obvious: They 15 don't know how to de-escalate, they don't know how 16 to step away from anything or take a break. I 17 don't know what "owe" means -- I don't think that 18 is the verb I meant -- but they need a different 19 kind of communication. So this is just -- 20 So I saw them together, I saw her alone, I 21 see him alone. And what he's reporting is similar 22 to what she's reporting: They have no skills,</p>	<p style="text-align: right;">124</p> <p>1 A -- I wrote: 2 hours couple then Amber. 2 It means he is the one who walked out of that 3 session. 4 Q Okay. 5 A I'm sorry. What was your question beyond 6 that? 7 Q My question was, am I correct that all of 8 your notes for the October 14, 2015 couples 9 session for three hours are completely redacted? 10 Is that true? 11 A Yes. 12 Q Okay. Then let's go to the next session 13 which starts -- the notes start on page 9. That 14 session took place on October 21, 2015; is that 15 correct? 16 MS. BIRTJA: The screen is on page 10, 17 October 29th, so we're -- 18 MR. CHEW: Let's go back. I'm sorry. 19 THE WITNESS: No, that's me. You want to 20 be on page 9? 21 Q Yes, please. I'm sorry. If you go 22 back -- yes, right there.</p>

<p style="text-align: right;">125</p> <p>1 So the next session occurred on</p> <p>2 October 21, 2015. True?</p> <p>3 A True.</p> <p>4 Q And it lasted two hours. It started as a</p> <p>5 couple, then Mr. Depp left, and then you spoke</p> <p>6 only with Amber but in the context of couples</p> <p>7 therapy; is that right?</p> <p>8 A Yes.</p> <p>9 MR. NADELHAFT: Objection;</p> <p>10 mischaracterizes the previous testimony.</p> <p>11 Q Well, it's -- am I right?</p> <p>12 MR. NADELHAFT: Same objection.</p> <p>13 MS. BIRTJA: I don't think they heard your</p> <p>14 answer, Ms. -- Dr. Anderson.</p> <p>15 THE WITNESS: Yes.</p> <p>16 Q And as with the last session, everything</p> <p>17 about this session has been redacted; is that</p> <p>18 right?</p> <p>19 A Yes.</p> <p>20 Q Okay. And let's go to the next session on</p> <p>21 page 10, the next session was on October 24, 2015.</p> <p>22 And I can't see from the code. Was that a couples</p>	<p style="text-align: right;">127</p> <p>1 Dr. Anderson.</p> <p>2 BY MR. CHEW:</p> <p>3 Q So the next session was -- after that was</p> <p>4 on October 29, 2015; is that right?</p> <p>5 A Yes.</p> <p>6 Q And --</p> <p>7 A That one? No, that one was cancelled.</p> <p>8 Q Oh, it was cancelled. That's why it was</p> <p>9 so short. Okay.</p> <p>10 And then the one after that, still on</p> <p>11 page 10, was on November 12, 2015?</p> <p>12 A There's a -- an appointment on 11/4 that</p> <p>13 was cancelled that I didn't put an entry on.</p> <p>14 Q Okay. Thank you. That's helpful.</p> <p>15 What about November 12th --</p> <p>16 A Yes.</p> <p>17 Q -- was that a joint session?</p> <p>18 A Yes, it was.</p> <p>19 Q And was that in person?</p> <p>20 A Yes.</p> <p>21 Q And fair to say that everything has been</p> <p>22 redacted from that?</p>
<p style="text-align: right;">126</p> <p>1 therapy, or was it just one or the other of them</p> <p>2 attending?</p> <p>3 A No, no, no. This is a red phone session</p> <p>4 with Ms. Heard.</p> <p>5 Q Okay. Great. And it lasted 1 1/2 hours?</p> <p>6 A Yes.</p> <p>7 Q And everything about that telephonic</p> <p>8 session with Ms. Heard has been redacted, so we</p> <p>9 can't possibly know what happened. True?</p> <p>10 MR. NADELHAFT: Objection; form,</p> <p>11 foundation.</p> <p>12 Go ahead.</p> <p>13 MS. BIRTJA: I would just say -- Ben, the</p> <p>14 only thing I would say to that is I only redacted</p> <p>15 things not dealing with physical abuse or abuse in</p> <p>16 any manner, so you can assume that wasn't</p> <p>17 discussed because otherwise it wouldn't have been</p> <p>18 redacted.</p> <p>19 But, otherwise, the premise of your</p> <p>20 question is fair.</p> <p>21 MR. CHEW: Okay. Thanks. There was --</p> <p>22 again, there's no quarrel with you whatsoever, or</p>	<p style="text-align: right;">128</p> <p>1 A Yes.</p> <p>2 Q Okay. And then the next session on</p> <p>3 page 11 is -- that, even I can understand. So</p> <p>4 there was a no-show on December 4, 2015; is that</p> <p>5 right?</p> <p>6 A Yes. I -- I'd like to clarify the no-</p> <p>7 shows in this.</p> <p>8 Q Oh, please do.</p> <p>9 A I think they both told me, but I think</p> <p>10 Mr. Depp told me at one point -- but I already</p> <p>11 knew because this happens with couples -- when a</p> <p>12 couple is having a lot of trouble in sessions but</p> <p>13 they're doing well at home and they're in a little</p> <p>14 bit of a honeymoon, you know, period, they cancel</p> <p>15 instead of coming in because they know coming in</p> <p>16 will get them into conflict.</p> <p>17 Q Okay. And fair to say that that happened</p> <p>18 again on December 10, 2015?</p> <p>19 A I can't tell which sessions they were sick</p> <p>20 or which -- which sessions they were cancelling</p> <p>21 because of this dynamic. But it was admitted and</p> <p>22 explained to me, and I understood it fully.</p>

<p style="text-align: right;">129</p> <p>1 Q Okay. And still on page 11, the next 2 session was on December 15, 2015, and it was a 3 telephonic session; is that right? 4 A With -- yes, with Ms. Heard. 5 Q That was with Ms. Heard. Okay. 6 So, obviously, just directing your 7 attention to the only part that hasn't been 8 redacted, you write: Then last night (Monday) she 9 slapped him as he sat there talking incoherently. 10 Who slapped who? 11 MR. NADELHAFT: Objection; calls for 12 hearsay. 13 THE WITNESS: I actually -- I actually 14 know what happened. 15 Q What happened? 16 MR. NADELHAFT: Objection; form, 17 foundation, hearsay. 18 THE WITNESS: This was, as I said, 19 Ms. Heard talking on the phone to me. Mr. Depp's 20 mother was in ICU. He had been doing a lot of -- 21 he was fucked up, as she would say, on a lot of 22 drugs, and she slapped him because he was being</p>	<p style="text-align: right;">131</p> <p>1 kicked her leg, hit her in the head. 2 Do you see all of that? 3 A I do. 4 Q And this is what she reported to you, 5 correct? 6 A Yes. 7 Q He was not present -- he was not on the 8 call when she made these allegations, was -- was 9 he? 10 A No. 11 Q And you didn't see any of this, did you? 12 A No. 13 Q And you didn't see her in person -- 14 A No. 15 Q -- after -- 16 Just so I can finish. I'm sorry. 17 You didn't see her in person after he 18 claimed -- after she claimed that he pulled her 19 hair, bruised her face, kicked her leg, and hit 20 her in the head? 21 MS. BIRTJA: Ever -- 22 MR. NADELHAFT: Ever?</p>
<p style="text-align: right;">130</p> <p>1 incoherent and talking about another -- being with 2 another woman. 3 BY MR. CHEW: 4 Q Did she -- did she tell you that he had 5 hit her first, or was she the one who initiated 6 the slap? 7 A She -- 8 MR. NADELHAFT: Objection; hearsay. 9 THE WITNESS: She -- 10 MS. BIRTJA: If you recall, go ahead. 11 THE WITNESS: She initiated that one 12 because I think she felt demeaned and threatened. 13 Q Then there's some more -- 14 And when you say "she," you mean Amber, 15 correct? 16 A I do. 17 Q And then there's a notation that says, 18 Then this AM he wanted to fight. 19 Is the "he" Mr. Depp? 20 A Yes. 21 Q Then it says, But then they fought, her 22 too, and he pulled out hair, bruised her face,</p>	<p style="text-align: right;">132</p> <p>1 MS. BIRTJA: Ever or just at the time of 2 the appointment? 3 BY MR. CHEW: 4 Q I'm talking about -- we'll get to the 5 other -- but I'm just talking about this 6 particular instance. 7 When she reported to you on December 15, 8 2015 that Mr. Depp had allegedly pulled her hair, 9 bruised her face, kicked her leg, hit her in the 10 head, you didn't see her personally after that, 11 did you? You didn't see any of those injuries -- 12 alleged injuries, did you? 13 MS. BIRTJA: Well, may misstate her prior 14 testimony and vague as to time. 15 But at that session, did you see any of 16 those injuries? 17 MR. NADELHAFT: Join the objection. 18 THE WITNESS: Not at that session. 19 Q Okay. Then there is a notation: Should 20 she call police, question mark. 21 A Where is that? 22 Q That's right below what we were just</p>

<p style="text-align: right;">133</p> <p>1 talking about. In red it says, Should she call 2 police? 3 What does that refer to? 4 MR. NADELHAFT: Objection; form, 5 foundation, hearsay. 6 MS. BIRTJA: May call for speculation, 7 lacks foundation. 8 To the extent you recall, go ahead. 9 THE WITNESS: Well, I don't know if I'm 10 looking where you are. I have, Will she have 11 advantage if she leaves him but files with police 12 for abuse first? 13 Q Doctor, we'll get to that. 14 But I'm asking you the line above that -- 15 A Oh. 16 Q -- it says, Should she call -- 17 A Okay. 18 Q -- because I'm trying to get the bits. 19 A I see it. 20 Q Because they've given us so little, we 21 have to milk everything we can out of what little 22 we have.</p>	<p style="text-align: right;">135</p> <p>1 was changing the rules of the game a little bit, 2 so -- and I also was trying to be protective of 3 them that -- don't -- you don't make this public. 4 Once you call the police it's public. 5 Q Then you write: doesn't want to divorce, 6 wants to want to divorce. 7 A Yes. 8 Q What did you mean by that? 9 MR. NADELHAFT: Objection; form, 10 foundation, hearsay. 11 MS. BIRTJA: May call for opinion 12 testimony too. 13 But go ahead. 14 THE WITNESS: She loved him. He loved 15 her. She believed that -- she wasn't stupid. She 16 knew that what they were doing wasn't healthy, and 17 so she wanted to want to divorce him, but she 18 didn't. And yet it had escalated to this point. 19 So she was trying to figure out what to do. And 20 she had an entourage around her telling her what 21 to do. 22 Q Who was her entourage?</p>
<p style="text-align: right;">134</p> <p>1 A Yeah. 2 Q So what did you mean -- 3 A That was her asking me. 4 MR. NADELHAFT: Calls for hearsay, from 5 my -- 6 Q Did you -- 7 MR. NADELHAFT: -- previous objection. 8 Q Did you respond to her? 9 A I believe I did. 10 Q Do you recall how you responded? 11 A I would have responded negatively. 12 Q And why did you -- why would you have 13 responded negatively? 14 MR. NADELHAFT: Objection; speculation, 15 form, foundation. 16 MS. BIRTJA: May also call for an opinion 17 testimony. 18 But go ahead. 19 THE WITNESS: For the same reason I 20 already explained to the other side, he -- he had 21 a lot of damage himself over time physically, and 22 it seemed quite mutual to me, and I thought she</p>	<p style="text-align: right;">136</p> <p>1 A She had a routine group of friends that 2 stayed with her, lived in her home. Probably as 3 well as paid people, but I don't know. 4 Q Do you recall the names of any of her 5 entourage? 6 A One was Rocky. 7 Q Was that Rocky Pennington? 8 A I don't know. 9 Q Do you know what Rocky Pennington was 10 telling her what -- to do? 11 A I'm not positive, but I think that she was 12 being encouraged to protect herself and turn him 13 in. Because they were witness to some of this. 14 Q She had -- she had told you that they were 15 witnesses to some of this; is that correct? 16 A Yes. 17 Q Directing your attention to the last 18 snippet from that session: will she have 19 advantage if she leaves him but files with police 20 for abuse first? 21 Was that a question that she asked you? 22 A Yes. This was her talking out loud trying</p>

<p style="text-align: right;">137</p> <p>1 to strategize for herself.</p> <p>2 MR. NADELHAFT: And just objection to</p> <p>3 hearsay.</p> <p>4 Q What did she say specifically about</p> <p>5 whether she would have an advantage if she leaves</p> <p>6 him, but would file with the police first?</p> <p>7 MR. NADELHAFT: Objection; hearsay.</p> <p>8 MS. BIRTJA: To the extent you recall</p> <p>9 beyond what's in your note, go ahead.</p> <p>10 THE WITNESS: I don't know exactly what</p> <p>11 she was referring to. I assumed it was the court</p> <p>12 of public opinion, in part. I don't know if it</p> <p>13 was a legal -- I don't really know. But she had</p> <p>14 considered all the possibilities and was trying to</p> <p>15 sort out what to do.</p> <p>16 Q Did she tell you that she was concerned</p> <p>17 about the court of public opinion?</p> <p>18 MR. NADELHAFT: Objection; hearsay, form,</p> <p>19 foundation.</p> <p>20 THE WITNESS: Not at that point.</p> <p>21 Q Did she tell you at any point that she was</p> <p>22 concerned about the court of public opinion?</p>	<p style="text-align: right;">139</p> <p>1 THE VIDEOGRAPHER: On record, 3:32.</p> <p>2 MR. CHEW: Lucien, would you please call</p> <p>3 up for Dr. Anderson what we've marked as</p> <p>4 Plaintiff's Exhibit 3.</p> <p>5 AV TECHNICIAN: Stand by.</p> <p>6 (Plaintiff's 3, December 19, 2015 e-mail</p> <p>7 from Heard to Anderson, Bates No. ALH_00006470,</p> <p>8 was marked for identification and is attached to</p> <p>9 the transcript.)</p> <p>10 AV TECHNICIAN: Showing Plaintiff's</p> <p>11 Exhibit 3 on screen.</p> <p>12 BY MR. CHEW:</p> <p>13 Q And, Dr. Anderson, I think this is the</p> <p>14 same document that Mr. Nadelhaft showed you as</p> <p>15 Anderson Exhibit 6, so I'm not going to ask you to</p> <p>16 identify it again, but I do have a couple of</p> <p>17 questions about it that Mr. Nadelhaft did not ask.</p> <p>18 I believe you testified, and correct me if</p> <p>19 I'm wrong, that you have never spoken to any of</p> <p>20 Ms. Heard's other psychologists or therapists. Is</p> <p>21 that true?</p> <p>22 A That's true.</p>
<p style="text-align: right;">138</p> <p>1 MR. NADELHAFT: Objection; hearsay, form,</p> <p>2 foundation, speculation.</p> <p>3 MS. BIRTJA: To the extent you recall, go</p> <p>4 ahead.</p> <p>5 THE WITNESS: I think that came up later.</p> <p>6 BY MR. CHEW:</p> <p>7 Q Do you recall what she said later about</p> <p>8 the court of public opinion?</p> <p>9 MR. NADELHAFT: Objection; hearsay, form,</p> <p>10 foundation, speculation.</p> <p>11 THE WITNESS: No.</p> <p>12 MR. NADELHAFT: May we please take a</p> <p>13 ten-minute break. And may we just ask Lucien or</p> <p>14 Drew what the time elapsed has been so far.</p> <p>15 THE VIDEOGRAPHER: We're two hours nine</p> <p>16 minutes total time.</p> <p>17 MR. CHEW: Great.</p> <p>18 Can we come back in ten minutes, please.</p> <p>19 THE WITNESS: Okay.</p> <p>20 MR. CHEW: Thank you very much.</p> <p>21 THE VIDEOGRAPHER: Off record, 3:20.</p> <p>22 (Recess was held.)</p>	<p style="text-align: right;">140</p> <p>1 Q And putting that aside, when she refers to</p> <p>2 her own therapist in this Exhibit 3, do you know</p> <p>3 the name of that person, putting aside whether you</p> <p>4 had ever spoken to him or her?</p> <p>5 MS. BIRTJA: May call for speculation.</p> <p>6 Go ahead.</p> <p>7 THE WITNESS: I do not.</p> <p>8 Q Okay. Did Ms. Heard ever explain to you</p> <p>9 why the nuances and complexity of her relationship</p> <p>10 with Mr. Depp would be lost on her own therapist?</p> <p>11 MR. CHEW: Objection; hearsay.</p> <p>12 MS. BIRTJA: And only if she told you,</p> <p>13 not -- don't make assumptions or assume why she</p> <p>14 said that. Just, if she told you, tell him what</p> <p>15 she said.</p> <p>16 THE WITNESS: I believe that she felt</p> <p>17 known in a more thorough way in terms of her --</p> <p>18 her behavior inside of the relationship.</p> <p>19 Q Let's go back, then, Dr. Anderson, to</p> <p>20 Exhibit 2. I'm sorry to jump around, but I'm</p> <p>21 trying to keep it all in the right date frame.</p> <p>22 And let's pick up where we left off, on</p>

<p style="text-align: right;">141</p> <p>1 the bottom of page 11 of Plaintiff's Exhibit 2.</p> <p>2 A Okay.</p> <p>3 Q And specifically the entry that begins on</p> <p>4 January 13th. It's at the very bottom of page 11.</p> <p>5 It's literally the last line. Oh, that's it.</p> <p>6 On January 13, 2016, was this a joint</p> <p>7 session with Mr. Depp and Ms. Heard, or was this</p> <p>8 just with one of them?</p> <p>9 A It was only Ms. Heard. And let me go back</p> <p>10 and see if it -- it was phone. No, no, no. I'm</p> <p>11 sorry. It was in person. No, it wasn't. No, no,</p> <p>12 no. Never mind.</p> <p>13 1/13/16 was Ms. Heard in person.</p> <p>14 Q And do you know how long this in-person</p> <p>15 session was with Ms. Heard on January 13, 2016?</p> <p>16 A I think it was probably just one hour.</p> <p>17 Q You write: didn't fight on island till</p> <p>18 last day on island started to get into something.</p> <p>19 What did you -- what were you referring to</p> <p>20 there?</p> <p>21 A Well, Christmas had occurred and the goal</p> <p>22 was -- they had a lot of people going to his</p>	<p style="text-align: right;">143</p> <p>1 Mr. Depp, correct?</p> <p>2 A Yes.</p> <p>3 Q So this is Ms. Heard admitting to you that</p> <p>4 she threw a can at Mr. Depp, correct?</p> <p>5 MR. NADELHAFT: Objection; form,</p> <p>6 foundation, hearsay.</p> <p>7 THE WITNESS: Yes.</p> <p>8 Q Did she tell you what kind of can she</p> <p>9 threw at him?</p> <p>10 MR. NADELHAFT: Objection; hearsay.</p> <p>11 THE WITNESS: I don't have a clue.</p> <p>12 Q Did she ever tell you in words or</p> <p>13 substance that she threw a can of mineral spirits</p> <p>14 at him?</p> <p>15 MR. NADELHAFT: Objection; hearsay, form,</p> <p>16 foundation, speculation.</p> <p>17 MS. BIRTJA: To the extent you recall</p> <p>18 before -- beyond your note, go ahead.</p> <p>19 THE WITNESS: I don't remember.</p> <p>20 Q Do you recall that she threw a can of</p> <p>21 paint thinner at him?</p> <p>22 MR. NADELHAFT: Objection; form,</p>
<p style="text-align: right;">142</p> <p>1 island and they were going to be together, and the</p> <p>2 goal was to try and get through the Christmas</p> <p>3 holiday without fighting, and so she was reporting</p> <p>4 on that.</p> <p>5 Q Then she -- you write: he got aggressive,</p> <p>6 threatening, didn't touch him, hid in bathroom.</p> <p>7 What were you referring to there?</p> <p>8 A What she reported to me, which was an</p> <p>9 improvement, that she didn't participate.</p> <p>10 Q So is it fair to say that she told you she</p> <p>11 did not hit him at that time?</p> <p>12 A Yes. That's what I believe my notes say,</p> <p>13 yes.</p> <p>14 Q When she told you "hid in bathroom," was</p> <p>15 that referring to Mr. Depp's hiding in the</p> <p>16 bathroom or Ms. Heard's hiding in the bathroom?</p> <p>17 A I believe it was herself.</p> <p>18 Q Then you write: she threw can at him,</p> <p>19 since home fighting, then she better.</p> <p>20 Who is the "she" that threw a can at him?</p> <p>21 A Ms. Heard.</p> <p>22 Q And the "him" whom she threw a can at was</p>	<p style="text-align: right;">144</p> <p>1 foundation, speculation, hearsay.</p> <p>2 THE WITNESS: I don't remember.</p> <p>3 BY MR. CHEW:</p> <p>4 Q Did she tell you whether she -- when she</p> <p>5 threw the can at Mr. Depp, whether she hit him or</p> <p>6 missed him?</p> <p>7 MR. NADELHAFT: Objection; form,</p> <p>8 foundation, speculation, hearsay.</p> <p>9 THE WITNESS: I -- I don't recall what she</p> <p>10 said, no.</p> <p>11 Q Okay. And just the last entry this page,</p> <p>12 if you go further down on page 12. Still on</p> <p>13 page 12, I'm sorry, yes. Do you see the notation</p> <p>14 to the session on January 20, 2016?</p> <p>15 A Yes.</p> <p>16 Q And you see it's completely redacted,</p> <p>17 correct?</p> <p>18 A Yes.</p> <p>19 Q Was it your understanding -- was this a</p> <p>20 solo session with Ms. Heard?</p> <p>21 A Yes, it was.</p> <p>22 Q And do you recall how long it lasted?</p>

<p style="text-align: right;">145</p> <p>1 A It was an hour.</p> <p>2 Q But without referencing the redacted</p> <p>3 materials you can't tell me what happened or what</p> <p>4 was said during the session. True?</p> <p>5 A Not --</p> <p>6 MS. BIRTJA: That there wasn't any report</p> <p>7 of abuse, otherwise that wouldn't have been</p> <p>8 redacted.</p> <p>9 MR. CHEW: Okay.</p> <p>10 MS. BIRTJA: But go ahead.</p> <p>11 THE WITNESS: What she said.</p> <p>12 Q Okay. And I'm only doing this just to</p> <p>13 establish the record of why you're testifying the</p> <p>14 way you are.</p> <p>15 A Sure.</p> <p>16 MR. CHEW: Lucien, if you would please</p> <p>17 call up what's been marked as Plaintiff's</p> <p>18 Exhibit 4.</p> <p>19 AV TECHNICIAN: Stand by.</p> <p>20 (Plaintiff's 4, March 8th-9th, 2016 e-mail</p> <p>21 between Carino and Anderson, Bates No. CC000126,</p> <p>22 was marked for identification and is attached to</p>	<p style="text-align: right;">147</p> <p>1 Did you receive that e-mail on or about</p> <p>2 March 8th in the morning at 6:23 a.m.?</p> <p>3 A Well, apparently, because I responded in</p> <p>4 the morning.</p> <p>5 Q Okay. Well, then let's skip it and go</p> <p>6 right back to your response.</p> <p>7 So the response at the top of the page</p> <p>8 of -- the second entry, I suppose, did you write</p> <p>9 that e-mail to Mr. Carino on March 8, 2016 at</p> <p>10 7:27 a.m.?</p> <p>11 A I did.</p> <p>12 Q And fair to say that you weren't</p> <p>13 enthusiastic about the idea of making a house</p> <p>14 call?</p> <p>15 A I was not.</p> <p>16 Q And Mr. Nadelhaft asked you about what it</p> <p>17 was you wanted Johnny to understand about the</p> <p>18 process.</p> <p>19 A And I was wrong, because I can see now the</p> <p>20 date of it, looking at it more carefully. This is</p> <p>21 after the relationship has devolved considerably.</p> <p>22 So what I -- I think was guessing was earlier in</p>
<p style="text-align: right;">146</p> <p>1 the transcript.)</p> <p>2 AV TECHNICIAN: Showing Exhibit 4 on the</p> <p>3 screen.</p> <p>4 BY MR. CHEW:</p> <p>5 Q You've seen this before, Dr. Anderson. I</p> <p>6 would represent to you that it's a slight</p> <p>7 variation of the document Mr. Nadelhaft showed you</p> <p>8 as Anderson 8. I think the difference -- and I</p> <p>9 may be wrong, but I think the only difference is</p> <p>10 that Mr. Nadelhaft may have redacted out correctly</p> <p>11 some of the contact information. But if I'm</p> <p>12 wrong, I'm wrong.</p> <p>13 MR. NADELHAFT: Ben, can you just give the</p> <p>14 Bates number so I know what it is.</p> <p>15 MR. CHEW: Yes. It's CC 126.</p> <p>16 MR. NADELHAFT: Thank you.</p> <p>17 Q And, actually, it's good that you're there</p> <p>18 because let's go back to the -- this is two</p> <p>19 e-mails, and it starts at the second part of the</p> <p>20 page. So I'll just ask you about the first</p> <p>21 e-mail, the one on Tuesday, March 8, 2016, at</p> <p>22 6:23 a.m. from Christian Carino.</p>	<p style="text-align: right;">148</p> <p>1 the relationship -- I don't know what it was I</p> <p>2 wanted him to understand.</p> <p>3 Q I see. Okay.</p> <p>4 A Don't have a clue.</p> <p>5 Q Let's go back to Exhibit 2, then, please.</p> <p>6 And we're not going to repeat. We're just picking</p> <p>7 up where we left off. And now we've gotten up to</p> <p>8 page 13 of the 17th page of your notes.</p> <p>9 So if we can start -- exactly. Do you see</p> <p>10 where the notes of your session on June 18, 2016</p> <p>11 begin?</p> <p>12 A Yes.</p> <p>13 Q And was this a solo session, couples</p> <p>14 session, between you and Mr. Depp only?</p> <p>15 A This is with Mr. Depp. It's blue. It's</p> <p>16 just the two of us.</p> <p>17 Q Gotcha. And it lasted 1 1/3 hours?</p> <p>18 A Yes.</p> <p>19 Q You write: fight on her April 22nd</p> <p>20 birthday, he late, huge fight, his mother died on</p> <p>21 the 20th.</p> <p>22 I think I know what you're referring to,</p>

<p style="text-align: right;">149</p> <p>1 but if you could please describe that for the 2 record. 3 A One second. 4 MR. NADELHAFT: Objection to the extent it 5 calls for hearsay and speculation. 6 THE WITNESS: This is when I got the 7 Scaramanga productions on my phone. So he found 8 me at home, which was new. Domestic violence 9 charges had already been made. His mother had 10 just died on the 20th. 11 Q Was that the 20th -- I'm sorry. Was that 12 the 20th of May that his mother died? 13 A I don't -- the truth is, I don't know. 14 Q Well, this entry -- this phone call from 15 Mr. Depp took place on June 18th, correct? 16 A Yes. 17 Q And he -- and you write that his mother 18 died on the 20th. Does that refresh your 19 recollection about his mother dying on May 20th? 20 A I can make an assumption, but I can't give 21 you full recall. I don't know. 22 Q Well, when he told you that there was a</p>	<p style="text-align: right;">151</p> <p>1 specific address, go ahead. Otherwise, let him 2 know. 3 MR. NADELHAFT: Objection; assumes facts 4 not in evidence. 5 Go ahead. 6 THE WITNESS: I don't remember. I don't 7 know what the dates are referring to. 8 Q Then you write: he said he would file for 9 divorce. 10 Who is the "he"? 11 A Mr. Depp. 12 MR. NADELHAFT: Objection; hearsay. 13 MS. BIRTJA: I don't think they heard your 14 answer. One more time, Dr. Anderson. 15 THE WITNESS: This is his session with me 16 where he's talking about what is going on and, 17 yes, she admitted that they had a terrible fight, 18 that he was late. He's -- the charges have 19 already been made against him and he's thinking 20 about filing for divorce, yes. 21 Q So he told you it was his intention to 22 file for divorce from Amber, correct?</p>
<p style="text-align: right;">150</p> <p>1 fight on April 22 birth- -- 22 birthday, was that 2 Ms. Heard's 30th birthday? 3 A I think it was. 4 Q And is he telling you that he arrived late 5 for the birthday dinner party and there was a huge 6 fight? 7 A Yes. 8 Q Do you recall what, if anything, he told 9 you about the huge fight he had with Amber on the 10 night of her 30th birthday? 11 MR. NADELHAFT: Objection; hearsay. 12 THE WITNESS: No, I don't remember. 13 Q And then you write that -- 14 A Well -- 15 Q -- she left on the 23rd. 16 "She" is Amber, correct? 17 A Yes. 18 Q And is that her -- him telling you that 19 she left the East [sic] Columbia condo on the 23rd 20 of April? 21 MR. NADELHAFT: Objection. 22 MS. BIRTJA: To the extent you recall that</p>	<p style="text-align: right;">152</p> <p>1 MR. NADELHAFT: Objection; hearsay, form, 2 foundation, speculation. 3 MS. BIRTJA: To the extent you recall, go 4 ahead. 5 THE WITNESS: Yes. But he's also saying 6 that she did it immediately while he was thinking 7 about it, and filed for a restraining order. 8 BY MR. CHEW: 9 Q Understood. 10 Further down the page 13 you write that, 11 He wants his name cleared, can't get it, but 12 has -- she has domestic violence charge against 13 her in history. 14 Who is the "he" who wanted his name 15 cleared? 16 A Mr. -- 17 MR. NADELHAFT: Objection; hearsay, form, 18 foundation. 19 THE WITNESS: Mr. Depp. 20 Q And when he told you that she has a 21 domestic violence charge against her, who is the 22 "she"?</p>

<p style="text-align: right;">153</p> <p>1 MR. NADELHAFT: Objection; hearsay. 2 THE WITNESS: Ms. Heard. 3 BY MR. CHEW: 4 Q What did Mr. Depp tell you about the 5 domestic violence charge that Ms. Heard had in her 6 past? 7 MR. NADELHAFT: Objection; hearsay, 8 speculation. 9 MS. BIRTJA: To the extent he told her 10 anything, go ahead. 11 Sorry, Adam. 12 THE WITNESS: Nothing more than that she 13 had it. 14 Q Did he ever -- strike that. 15 Do you know who Tasya Van Ree is? 16 A Yeah -- well, I know her name. I know she 17 was someone that Ms. Heard was in a relationship 18 with. 19 Q Do you know that Ms. Heard was arrested 20 for assaulting Ms. Van Ree at the Seattle airport? 21 MR. NADELHAFT: Objection; calls for facts 22 not in evidence, hearsay, speculation, form,</p>	<p style="text-align: right;">155</p> <p>1 think I'm quoting what -- some of this is just 2 typing of the words he's using while he's talking. 3 He's also very verbal when no one's interrupting 4 him. 5 And I think he talked about how chaotic it 6 was, how violent it was, and she gave as good as 7 she got. That's kind of a direct quote. Those 8 are not my -- that's not my language. 9 BY MR. CHEW: 10 Q And did he say to you in words or 11 substance that she started it? 12 MR. NADELHAFT: Objection; hearsay, form, 13 foundation, speculation. 14 THE WITNESS: Yes. And he showed me his 15 finger, a piece of it had been cut off with a 16 bottle. 17 Q What did he tell you about a piece of his 18 finger being cut off with a bottle? 19 MR. NADELHAFT: Objection; hearsay, form, 20 foundation, speculation. 21 THE WITNESS: That she had thrown 22 something at him that had sliced off a piece of</p>
<p style="text-align: right;">154</p> <p>1 foundation. 2 MS. BIRTJA: If you know that, let him 3 know that. But if you don't, let him know that, 4 too. 5 THE WITNESS: I know portions of it. But 6 no, I don't have that as a clear memory that at 7 the airport this and this happened. No, it was 8 not on my watch. It was from years before. 9 BY MR. CHEW: 10 Q And then you say, and he doesn't. 11 Was it your understanding that no other 12 woman had ever accused him of domestic physical 13 violence? 14 MR. NADELHAFT: Objection; form, 15 foundation, hearsay, speculation. 16 THE WITNESS: Yes. 17 Q Then you write: was chaotic violent but 18 gave as good as she got. 19 What does that mean? 20 MR. NADELHAFT: Objection; hearsay, form, 21 foundation, speculation. 22 THE WITNESS: I believe I'm quoting -- I</p>	<p style="text-align: right;">156</p> <p>1 his -- the tip of his finger, and I wrote his 2 chin. I don't remember that specifically. But I 3 remember thinking about his finger, and he showed 4 it to me. 5 BY MR. CHEW: 6 Q What did he tell you was thrown at his 7 finger to sever the top of it? 8 MR. NADELHAFT: Objection; hearsay, form, 9 foundation, speculation. 10 THE WITNESS: Let me look. 11 I don't remember. I mean, I think he said 12 a bottle, but I didn't write that down. 13 Q Did he tell you who threw the bottle that 14 severed the top of his finger? 15 MR. NADELHAFT: Objection; hearsay, form, 16 foundation, speculation. 17 THE WITNESS: Yes. It was Ms. Heard. But 18 at the same time he was in mourning for her 19 because he still loved her, but he knew he 20 couldn't afford to love her. And his mourning was 21 wrapped up with his mother's death. So he was not 22 in good shape.</p>

<p style="text-align: right;">157</p> <p>1 Q That's understandable.</p> <p>2 Directing your attention further down the</p> <p>3 page to the entry for July 13, 2016. Three hours</p> <p>4 Amber in person.</p> <p>5 Was that an in-person meeting you had, a</p> <p>6 couples therapy, with only Ms. Heard?</p> <p>7 A No, this is not couples therapy. This is</p> <p>8 Ms. – Ms. Heard by herself. I wrote in person.</p> <p>9 Q Oh, okay. So just to be clear, what</p> <p>10 follows in -- these are your notes for your</p> <p>11 individual treatment of Ms. Heard having nothing</p> <p>12 to do with couples therapy?</p> <p>13 A Not true. In my mind, the dust had not</p> <p>14 settled on the couple yet, and this was just kind</p> <p>15 of aftermath that the -- kind of falling apart of</p> <p>16 the marriage, but...</p> <p>17 Q I didn't mean to mischaracterize anything.</p> <p>18 I was just trying to suss out what it was.</p> <p>19 A No, this was not individual therapy for</p> <p>20 her. This is about the marriage.</p> <p>21 Q Okay. So the first part of your notes on</p> <p>22 page 13 -- at the bottom of page 13 they're all</p>	<p style="text-align: right;">159</p> <p>1 scaring her, he threw a phone, hit her, holds her</p> <p>2 hair, Rachel -- don't know who that is -- gets in</p> <p>3 between. And she says -- what you can see, if he</p> <p>4 hits me one more time...</p> <p>5 Q And, again, Dr. Anderson, if we can just</p> <p>6 break that down a little bit. So she told you</p> <p>7 that Mr. Depp accosts iO on the phone. Who is iO?</p> <p>8 A Some friend that I don't know. But</p> <p>9 that's -- I don't know if that's why that's -- but</p> <p>10 I have in parentheses above that iO is a friend.</p> <p>11 Q Do you know whether that is iO Tillett</p> <p>12 Wright?</p> <p>13 A I do not know.</p> <p>14 Q Did Ms. Heard explain to you how Mr. Depp</p> <p>15 could accost somebody over the phone?</p> <p>16 A It would have been her words. I don't</p> <p>17 know.</p> <p>18 Q That it wouldn't -- it wouldn't be</p> <p>19 possible to physically --</p> <p>20 A Yes.</p> <p>21 Q -- accost someone through a telephone</p> <p>22 line; is that correct?</p>
<p style="text-align: right;">158</p> <p>1 redacted, correct?</p> <p>2 A Yes.</p> <p>3 Q So then if you turn to page 14.</p> <p>4 MS. BIRTJA: I want to clarify, Ben,</p> <p>5 there's two words on the very last line of page 13</p> <p>6 and continues to page 14.</p> <p>7 MR. CHEW: Oh, actually, that's very</p> <p>8 helpful. Thank you very much, Michelle.</p> <p>9 Q So let's go to the bottom, those two</p> <p>10 words, on page 13, and continuing on to 14. You</p> <p>11 write: He accosts iO on phone.</p> <p>12 What did you mean by that?</p> <p>13 A Well, I'm looking at the line above to get</p> <p>14 some context for it. He is want-- he comes to</p> <p>15 see her and wants to talk -- he's reporting to</p> <p>16 me -- she's reporting to me that her family is</p> <p>17 guilting her. He comes, wanting to talk. He</p> <p>18 wants to talk about the people in her life. And</p> <p>19 so one of them is referred to as iO. Another one</p> <p>20 is referred to as Boo. And she says he accosts iO</p> <p>21 on the phone.</p> <p>22 But then she reports to me that he's</p>	<p style="text-align: right;">160</p> <p>1 A That's right.</p> <p>2 Q Okay. So -- and then Ms. Heard told you</p> <p>3 that Mr. Depp was scaring her, had thrown a phone</p> <p>4 at her. Is that something she relayed to you</p> <p>5 during that session?</p> <p>6 A Yes.</p> <p>7 Q And Mr. Depp was not present during that</p> <p>8 session, correct?</p> <p>9 A Correct.</p> <p>10 Q And then she says, Rachel gets in between.</p> <p>11 Might that have been -- well, what did you</p> <p>12 mean by that?</p> <p>13 A I'm quoting her. I'm trying to get data</p> <p>14 on what's going on. I don't know the cast of</p> <p>15 characters well.</p> <p>16 Q Might that have been Raquel?</p> <p>17 A Could have been.</p> <p>18 Q Or Rocky -- Rocky Pennington?</p> <p>19 A Could have been. I think it was.</p> <p>20 Q And then you write: If he hits me one</p> <p>21 more time I'll call the police.</p> <p>22 Is that something she told you?</p>

<p style="text-align: right;">161</p> <p>1 A I'm quoting her at this point, because 2 that's pretty much what I'm doing, I'm quoting. 3 Q Did Ms. Heard ever tell you in words or 4 substance the date or place of when Mr. Depp 5 allegedly threw a phone at her? 6 A I don't know when she's referring to, no. 7 It was chaotic as a psychologist as well to be 8 tracking all of this material. 9 Q Did he tell you in words or substance 10 whether, when he threw a phone at her, he actually 11 hit her with the phone? 12 MS. BIRTJA: Just to clarify, you mean 13 "she"? Because this is -- 14 THE WITNESS: Yeah, she. 15 MS. BIRTJA: -- her reporting it, not him. 16 MR. CHEW: Yeah, I'm sorry. Let me do 17 that better. 18 THE WITNESS: It says -- it says that 19 he -- she's implying him -- that's in the 20 sentence, the antecedent -- threw the phone and 21 hit her, so -- 22 Q Oh, hit her. Okay.</p>	<p style="text-align: right;">163</p> <p>1 Q Then there's another section that's 2 redacted. Do you see that? 3 A Underneath "calls a lawyer"? 4 Q No, before "calls a lawyer." 5 A Okay. 6 Q Do you see -- so there is a redacted space 7 between "calls a lawyer" and then "lawyer says." 8 Do you see that? 9 A I'm looking. 10 Q We're on page 14. I'm sorry. 11 A Yes, I see it. 12 Q Okay. And then you write: Lawyer says 13 file restraining order -- Johnny Depp hit me and 14 lived with for years. 15 What specifically do you remember 16 Ms. Heard telling you that caused you to write 17 that? 18 A That she did call a lawyer who said, File 19 a restraining order, which I, you know, would 20 expect, I suppose. And her -- and this was her 21 narrative: Johnny Depp hit me and I've lived with 22 it for years.</p>
<p style="text-align: right;">162</p> <p>1 A Yes. 2 Q Did he tell you where the phone hit her? 3 MS. BIRTJA: Just, again, did she tell you 4 where the phone hit her? 5 THE WITNESS: She probably did but I 6 didn't write it down. 7 Q Then she -- then you write: his men come 8 in. 9 A J leaves. J, that's Mr. Depp. 10 Q And then you write: calls a lawyer. 11 Who was it who called a lawyer? 12 A I believe it was her. 13 Q Did she tell you -- did she tell you that 14 she called anybody else other than her lawyer 15 after Mr. Depp left? 16 A Not so much that. It's just that her 17 friends were gathering around her and supporting 18 her and trying to get her to do this and -- you 19 know. 20 Q You mentioned the name Boo. Do you know 21 who Boo is, the full name? 22 A No.</p>	<p style="text-align: right;">164</p> <p>1 Q And, again, just to clarify, Mr. Depp was 2 not there during the session where Ms. Heard made 3 these allegations. True? 4 A True. 5 Q Okay. So very quickly, just to close out 6 this exhibit, you see some notes for a session 7 with Mr. Depp on July 27, 2016? That's back on 8 page 14. 9 A Yes. 10 Q Those are all redacted, correct? 11 A Yes. 12 Q And the same for the session with Mr. Depp 13 on July 28, 2016. True? 14 A Yes. 15 MS. BIRTJA: And to clarify, so -- I 16 assume there's going to be motion work about this. 17 Even though Mr. Depp had no restrictions to his 18 authorization, it's impossible to release that 19 information without her full release because 20 they're inevitably intertwined. 21 MR. CHEW: No, Michelle, I totally 22 understand your position. And, again, we have no</p>

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<p style="text-align: right;">165</p> <p>1 fault whatsoever with your position or your 2 client's. Our quarrel is with the California 3 counsel for -- 4 MS. BIRTJA: No, understood. I just 5 wanted to clarify so that if there is a question, 6 Well, he has a full release, why wasn't it -- so 7 that's the reason there. So inexplicably 8 intertwined, it's impossible to cull out. 9 MR. CHEW: We know. Mr. Dailey made it 10 impossible for us to conduct a complete 11 deposition. 12 MR. NADELHAFT: And I'll object to the 13 characterization, but go ahead. 14 MS. BIRTJA: I'm not saying any counsel 15 personally. I'm saying, based on the exact 16 language and the authorization that I was legally 17 obligated to follow based on HIPAA and other 18 mental health protections in the State of 19 California, some of which are federal as well, 20 based on the exact language of the authorization, 21 I'm just explaining the -- and also because you 22 don't have the benefit of seeing the redactions or</p>	<p style="text-align: right;">167</p> <p>1 BY MR. CHEW: 2 Q So on page -- 3 MR. NADELHAFT: I'll just object again to 4 the characterization. But go ahead, Ben. 5 MR. CHEW: Okay. Thank you. 6 Q Page 15, do you agree with me that all of 7 the -- your notes from your session with Amber on 8 July 28, 2016 have been redacted? 9 A Yes. 10 Q Same answer for your session with Mr. Depp 11 on August 2, 2016? 12 MR. NADELHAFT: Objection; form. 13 THE WITNESS: Yes. 14 Q And same question with the other two 15 sessions, one on October 3, 2016, and going on to 16 the next page, on November 23, 2016, everything is 17 redacted. True? 18 A Yes. 19 MR. NADELHAFT: I just want to be clear, 20 everything is not redacted on those pages. 21 MR. CHEW: Oh, okay. Well -- 22 MR. NADELHAFT: On the 8/2 there is a</p>
<p style="text-align: right;">166</p> <p>1 what's redacted, that even though Mr. Depp's 2 authorization didn't have limitations, the reason 3 some of his information is redacted is because it 4 inevitably would talk about her information that 5 goes beyond the scope of the specific language in 6 the release. 7 MR. CHEW: No, that -- thank you very 8 much. 9 MS. BIRTJA: And to clarify, too, I don't 10 want anyone to interpret us blaming. I mentioned 11 Mr. Dailey, because that is the person who I had 12 contact with. That's simply why I'm mentioning 13 his name. Not -- 14 MR. CHEW: No, I understand you're not 15 taking sides. But the record, I think, is pretty 16 clear. 17 MS. BIRTJA: Our only horse in the race is 18 that we don't want to violate HIPAA or cause 19 Ms. Anderson any problems. 20 MR. CHEW: I totally understand. When you 21 get an instruction like that from one counsel, you 22 have no choice but to -- but to obey it.</p>	<p style="text-align: right;">168</p> <p>1 couple lines, on page 15. 2 MR. CHEW: Yeah, nothing that we -- oh, 3 yeah, you're right. I'm sorry. Thank you. Thank 4 you, Mr. Nadelhaft. 5 MR. NADELHAFT: Okay. 6 BY MR. CHEW: 7 Q Let's go back to 15. On the entry 8 August 2, 2016, there is a reference: and she 9 wild and attacked. 10 What were you meaning to convey there? 11 MR. NADELHAFT: Objection; hearsay, form, 12 foundation, speculation. 13 THE WITNESS: I'm going to look because I 14 missed that the first time, that it was there, and 15 I'm going to read around it. 16 Uh-hum. Okay. I got it. So -- yes, 17 he's -- he's trying to understand everything after 18 the fact. And he was talking about Ms. Heard 19 being high maintenance, demanding, needy, and they 20 were beautiful when they were focused on each 21 other, but that she couldn't maintain without him 22 if he wasn't in her presence. And so he -- and</p>

<p style="text-align: right;">169</p> <p>1 then he avoided, sometimes, and defaulted to his 2 life. He had a band, he had friends, he had 3 things he did. And he said, and she was wild and 4 attacked. And that was his way of understanding 5 what the dynamic was, in part. 6 And then he talked about not being well 7 suited temperamentally. And his mother, Betty 8 Sue, and how she was a screecher and a -- a lot of 9 things. And he said at the end, Ms. Heard looked 10 like his mom, screaming and abusive. And he had 11 discussed Betty Sue with me at length about her 12 abuse. 13 So he was putting it together and trying 14 to understand the dynamic that he -- no matter how 15 much he loved her, that he was in a -- what he 16 felt was an abusive relationship, and that no 17 matter what he did, he couldn't -- he couldn't 18 control it. 19 Q And when he told you that she was wild and 20 attacked, did that include a physical attack or 21 was it just screaming and abuse? 22 MR. NADELHAFT: Objection; hearsay, form,</p>	<p style="text-align: right;">171</p> <p>1 have documented it in your notes? 2 MR. NADELHAFT: Objection; speculation, 3 form, foundation. 4 MS. BIRTJA: It's also slightly an opinion 5 question, but I also understand you're trying to 6 figure something out by exclusion, so I'll let it 7 fall within the facts. But that's a fine line 8 there. 9 He's essentially saying: Would you have 10 documented it? Yes or no. 11 THE WITNESS: Probably, maybe. But my 12 guess is, if he had said directly, I -- I would 13 have. But, remember, I was getting reports from 14 her. And the joint conflict involved both of 15 them, so I never felt like I needed to hear -- I 16 didn't need to -- I wasn't -- I wasn't you guys. 17 I was looking for anything other than receiving 18 information. So did he ever say it directly? I'm 19 not sure. And is it documented? It's not. 20 Q Did you ever report to the police or any 21 other authorities that Ms. Heard was the victim of 22 physical abuse at the hands of Johnny Depp?</p>
<p style="text-align: right;">170</p> <p>1 foundation. 2 MS. BIRTJA: Vague as to the word "abuse." 3 But go ahead. 4 THE WITNESS: From everything I know he 5 was referring to both. 6 BY MR. CHEW: 7 Q And going down -- 8 MR. CHEW: And thank you for -- to 9 Mr. Nadelhaft for pointing that out. 10 Q Is everything from your August 3, 2016 11 session redacted? 12 A Yes, if that's the last one. 13 Q It looks like -- is it fair to say that 14 after the notation -- after the notation referring 15 to the November 23, 2016 session, everything -- 16 all the remaining notes, patient notes, are 17 redacted? Is that correct? 18 A Yes. 19 Q Okay. In the course of your therapeutic 20 relationship with Mr. -- strike that. 21 If Mr. Depp had -- had admitted to 22 physical violence against Ms. Heard, would you</p>	<p style="text-align: right;">172</p> <p>1 MR. NADELHAFT: Objection; form, 2 foundation. 3 THE WITNESS: No, I did not. 4 MR. CHEW: If we could, please, Lucien, 5 look -- or call up Exhibit 5. 6 AV TECHNICIAN: Stand by. 7 (Plaintiff's 5, Session tracking ledger, 8 was marked for identification and is attached to 9 the transcript.) 10 AV TECHNICIAN: Showing Exhibit 5 on the 11 screen. 12 BY MR. CHEW: 13 Q And I will not ask you much about this 14 because I think Mr. Nadelhaft really covered the 15 waterfront very thoroughly on this. But I'll 16 just -- for the record, because we're almost 17 finished. Did you prepare this in the ordinary 18 course of your practice and business? 19 MS. BIRTJA: May call for a legal 20 conclusion. 21 Go ahead. 22 THE WITNESS: I did.</p>

<p style="text-align: right;">173</p> <p>1 Q Is this your handwriting?</p> <p>2 A It is.</p> <p>3 Q When you recorded this you attended -- you</p> <p>4 intended the information that you described to</p> <p>5 Mr. Nadelhaft and that you recorded on this</p> <p>6 document to be true and accurate, correct?</p> <p>7 A Yes.</p> <p>8 Q And you maintained this in the ordinary</p> <p>9 course of your practice and business. Is that</p> <p>10 true?</p> <p>11 A Yes.</p> <p>12 MS. BIRTJA: May call for a legal</p> <p>13 conclusion.</p> <p>14 Go ahead.</p> <p>15 THE WITNESS: Yes.</p> <p>16 Q And then directing your attention to the</p> <p>17 second page of Exhibit 5, is this a separate page</p> <p>18 for -- strike that.</p> <p>19 Did you keep a separate ledger for your</p> <p>20 treatment of Amber Heard that covered your</p> <p>21 treatment of her outside the context of couples</p> <p>22 therapy?</p>	<p style="text-align: right;">175</p> <p>1 didn't ask her about it.</p> <p>2 (Plaintiff's 6, November 18, 2019</p> <p>3 Treatment Summary for Amber Heard (AH) and Johnny</p> <p>4 Depp (JD) in response to requests for release of</p> <p>5 mental health records, was marked for</p> <p>6 identification and is attached to the transcript.)</p> <p>7 BY MR. CHEW:</p> <p>8 Q I think this is the last document about</p> <p>9 which I'm going to ask you. And I would just ask</p> <p>10 you -- it won't take long because most of it's</p> <p>11 redacted, but if you wouldn't mind just reviewing</p> <p>12 it, as much as you need to, to answer some</p> <p>13 questions about it.</p> <p>14 MS. BIRTJA: And, Ben, if it helps on this</p> <p>15 document, I, as well, was the one who did the</p> <p>16 redactions. And the redactions are pursuant to</p> <p>17 the exact language in the authorizations.</p> <p>18 MR. CHEW: Understood. And your</p> <p>19 conversations with Mr. Dailey; is that correct?</p> <p>20 MS. BIRTJA: My conversations with</p> <p>21 Mr. Dailey trying to understand the language of</p> <p>22 the authorization and understand the scope and</p>
<p style="text-align: right;">174</p> <p>1 A I did.</p> <p>2 Q Is that what's reflected here on the</p> <p>3 second page of Exhibit 5, or is that a</p> <p>4 continuation of your records of the couples</p> <p>5 therapy for Mr. Depp and Ms. Heard?</p> <p>6 A This is not a continuation; it's separate.</p> <p>7 And it's in a -- it's in 2018.</p> <p>8 Q And is that why this -- almost the</p> <p>9 entirety of page 2 of Exhibit 5 is redacted?</p> <p>10 MS. BIRTJA: Well, she would lack</p> <p>11 foundation because I did it, but that is why. And</p> <p>12 because I didn't want to be accused of destroying</p> <p>13 the document instead of just deleting the second</p> <p>14 page we redacted it.</p> <p>15 MR. CHEW: No, I greatly appreciate that</p> <p>16 because that makes the record very clear.</p> <p>17 Q I just wanted to make sure because</p> <p>18 Mr. Nadelhaft had not asked you about that.</p> <p>19 MR. CHEW: If we can please go to</p> <p>20 Exhibit 6, Lucien, which is a new document. When</p> <p>21 I say "new," it was produced by Ms. Anderson's</p> <p>22 office, but new in the sense that Mr. Nadelhaft</p>	<p style="text-align: right;">176</p> <p>1 breadth of it, correct --</p> <p>2 MR. CHEW: Okay.</p> <p>3 MS. BIRTJA: -- in terms of why she</p> <p>4 prepared it or how she prepared it.</p> <p>5 I will also put, just for the record, she</p> <p>6 legally is allowed to technically with mental</p> <p>7 health records produce a Treatment Summary in lieu</p> <p>8 of the process notes for a multitude of reasons,</p> <p>9 and that's what this is. She can explain that to</p> <p>10 you. But that's the legal basis for its creation</p> <p>11 as well.</p> <p>12 MR. CHEW: Thank you very much.</p> <p>13 BY MR. CHEW:</p> <p>14 Q Dr. Anderson, have you ever seen this</p> <p>15 document before?</p> <p>16 A Of course. I created it.</p> <p>17 Q Okay. And what is it?</p> <p>18 A It's a Treatment Summary when I was first</p> <p>19 subpoenaed, or my notes were required, years ago.</p> <p>20 My notes are jumbly. They don't say a lot.</p> <p>21 They're -- they're confusing, you know, as you've</p> <p>22 seen -- or you haven't seen, actually.</p>

<p style="text-align: right;">177</p> <p>1 So I did what psychologists do, you</p> <p>2 take – you go through all of those notes and</p> <p>3 you – and your brain, because it's not as if</p> <p>4 you're not left with a very – you know, I hope, a</p> <p>5 very clear sense of what went on.</p> <p>6 So I took everything I thought and</p> <p>7 believed conceptually about them, I went through</p> <p>8 all of my notes, and I wrote this Treatment</p> <p>9 Summary.</p> <p>10 Q Thank you. That's very helpful.</p> <p>11 And, Dr. Anderson, fair to say that</p> <p>12 everything on the first page of your Treatment</p> <p>13 Summary, Exhibit 6, is completely redacted? Is</p> <p>14 that correct?</p> <p>15 MS. BIRTJA: Well, it leaves the names of</p> <p>16 the patients. I mean, it has a title, it has a</p> <p>17 date, it has what it is. But to the body of it,</p> <p>18 it's redacted.</p> <p>19 But go ahead.</p> <p>20 THE WITNESS: Yes.</p> <p>21 Q Okay. And then fair to say that most of</p> <p>22 the second page has been redacted as well? Is</p>	<p style="text-align: right;">179</p> <p>1 trying to de-escalate their fights by walking away</p> <p>2 or leaving, as he had learned that was something</p> <p>3 he should do.</p> <p>4 So is it fair to say that Mr. Depp did</p> <p>5 tell you that he sought to de-escalate their</p> <p>6 fights by walking away or leaving as opposed to</p> <p>7 physically attacking her?</p> <p>8 MR. NADELHAFT: Objection; form,</p> <p>9 foundation, hearsay.</p> <p>10 THE WITNESS: Yes, that's true.</p> <p>11 Q Okay. Let's move to the next page,</p> <p>12 please. And I just want to focus on the one</p> <p>13 snippet on Bates page 3.</p> <p>14 Sorry. You write: She reported trying to</p> <p>15 initiate a fight with him one night, by slapping</p> <p>16 him, when she was offended by what he said.</p> <p>17 Is the "she" you're referring to there</p> <p>18 Ms. Heard?</p> <p>19 MR. CHEW: Objection; hearsay, form,</p> <p>20 foundation, speculation.</p> <p>21 THE WITNESS: Yes, it is.</p> <p>22 Q And is the "he" you're referring to Johnny</p>
<p style="text-align: right;">178</p> <p>1 that true?</p> <p>2 A I'm looking. It looks like it.</p> <p>3 Q And, then, if you can go up –</p> <p>4 A A half of paragraph is still there.</p> <p>5 Q Yeah. And I want to ask you about that</p> <p>6 one paragraph.</p> <p>7 I think you described this in the course</p> <p>8 of your testimony, but I did want to ask you about</p> <p>9 your sentence: She reported always hitting him</p> <p>10 back as a point of pride but admitted that she</p> <p>11 eventually initiated the hitting herself.</p> <p>12 Is the "she" you're referring to</p> <p>13 Ms. Heard?</p> <p>14 MR. NADELHAFT: Objection; hearsay, form,</p> <p>15 foundation.</p> <p>16 THE WITNESS: It is.</p> <p>17 Q And is the "him" you're referring to</p> <p>18 Johnny Depp?</p> <p>19 A It is.</p> <p>20 MR. NADELHAFT: Same objection.</p> <p>21 Q And then let me ask you about the next</p> <p>22 paragraph. You write: In particular, JD spoke of</p>	<p style="text-align: right;">180</p> <p>1 Depp?</p> <p>2 MR. NADELHAFT: Same objections.</p> <p>3 THE WITNESS: Yes, it is.</p> <p>4 Q And then one sentence later you write:</p> <p>5 However, they had a physical fight the next day,</p> <p>6 during which he reportedly pulled her hair, kicked</p> <p>7 her and bruised her face.</p> <p>8 When you say "reportedly," that was</p> <p>9 reported only by Ms. Heard, correct?</p> <p>10 A Yes.</p> <p>11 Q Then in the last sentence of the</p> <p>12 unredacted part you write: It was also at this</p> <p>13 time that she showed me photos of her injuries.</p> <p>14 When did Ms. Heard show you photos of her</p> <p>15 alleged injuries?</p> <p>16 A Well, to the best of my pulling together</p> <p>17 the information I wrote down, I'm – I'm saying it</p> <p>18 was right after that fight. And she – my</p> <p>19 recollection is she came in – she talked to me by</p> <p>20 phone and then came in the next day – or at least</p> <p>21 I thought I thought that – somewhere around the</p> <p>22 time she got the injuries. I know she came in in</p>

<p style="text-align: right;">181</p> <p>1 person to show me.</p> <p>2 Q Did she show you photos or did she show</p> <p>3 you --</p> <p>4 A Both. Both.</p> <p>5 MS. BIRTJA: Let him finish his whole</p> <p>6 question because he could be tricky and put a</p> <p>7 "not" or something --</p> <p>8 THE WITNESS: Okay.</p> <p>9 MS. BIRTJA: -- even though you clearly --</p> <p>10 MR. CHEW: No, I'm not trying to be</p> <p>11 tricky.</p> <p>12 Q You said she showed you photos. And so is</p> <p>13 it your testimony that she showed you photos of</p> <p>14 her injuries shortly after the alleged event?</p> <p>15 A Somewhere in the period while she still</p> <p>16 had injuries she showed me photos, but she also</p> <p>17 came in and showed me in person.</p> <p>18 Q And what did she show you in person?</p> <p>19 A Bruising on her face.</p> <p>20 Q Other than the bruising on her face, what</p> <p>21 else -- what other injuries did she show you?</p> <p>22 A I don't remember. There may have been</p>	<p style="text-align: right;">183</p> <p>1 vodka bottle he reported that she threw at him --</p> <p>2 at some unknown time -- and mentioned damage to</p> <p>3 his chin.</p> <p>4 Does this refresh your recollection as to</p> <p>5 what Mr. Depp told you about the cause of the</p> <p>6 severing of part of his finger?</p> <p>7 MR. NADELHAFT: Objection; form,</p> <p>8 foundation, hearsay.</p> <p>9 THE WITNESS: Yes. Because this was</p> <p>10 written in November of '19, and it's 2/22; I don't</p> <p>11 remember the details. But yes, if I wrote "vodka</p> <p>12 bottle," it's because it was in my -- in my</p> <p>13 records.</p> <p>14 Q So he had told you that Ms. Heard threw a</p> <p>15 vodka bottle --</p> <p>16 A Yes.</p> <p>17 Q -- at him which ended up slicing off the</p> <p>18 top of his finger; is that correct?</p> <p>19 A Yes.</p> <p>20 MR. NADELHAFT: Objection; hearsay.</p> <p>21 Q And he also -- you also write that he</p> <p>22 "mentioned damage to his chin." Does that refresh</p>
<p style="text-align: right;">182</p> <p>1 more, but I don't remember.</p> <p>2 Q And you weren't present during the alleged</p> <p>3 physical injuries, correct?</p> <p>4 A Correct.</p> <p>5 Q So the only basis you had with respect to</p> <p>6 the cause of the injuries was what Ms. Heard told</p> <p>7 you, correct?</p> <p>8 A Yes.</p> <p>9 Q Let's go to the last page of the</p> <p>10 Exhibit 6. And the first unredacted part you</p> <p>11 write: He said, quote, she gave as good as she</p> <p>12 got and she started it, unquote.</p> <p>13 Who is the "he"?</p> <p>14 MR. NADELHAFT: Objection; hearsay, form,</p> <p>15 foundation.</p> <p>16 Go ahead.</p> <p>17 THE WITNESS: Mr. Depp.</p> <p>18 Q And who is the "she" he was referring to?</p> <p>19 MR. NADELHAFT: Same objections.</p> <p>20 THE WITNESS: Ms. Heard.</p> <p>21 Q And you also write: In person, he showed</p> <p>22 me his fingertip that had been sliced off by a</p>	<p style="text-align: right;">184</p> <p>1 your recollection about what he said, if anything,</p> <p>2 about his chin?</p> <p>3 MR. NADELHAFT: Objection; hearsay.</p> <p>4 THE WITNESS: No, it doesn't.</p> <p>5 Q Then you write: I had some contact with</p> <p>6 AH, in person and by phone, and she spoke of more</p> <p>7 fighting and the decision to file against JD.</p> <p>8 What do you remember about your contact</p> <p>9 with Ms. Heard in person and by phone and what she</p> <p>10 said about more fighting and her decision -- and</p> <p>11 the decision to file against JD?</p> <p>12 A Nothing beyond what I've already said when</p> <p>13 we went through the individual sessions that has</p> <p>14 more of a complete kind of record for me.</p> <p>15 Q And when you write about the decision to</p> <p>16 file against JD, was that a reference to the</p> <p>17 domestic violence restraining order or was that</p> <p>18 the divorce or both or either?</p> <p>19 A It would be either/or.</p> <p>20 Q And you write: The physical violence that</p> <p>21 occurred between them appeared to me to be mutual.</p> <p>22 You never actually witnessed any physical</p>

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<p>185</p> <p>1 violence by Mr. Depp or by Ms. Heard, correct?</p> <p>2 A Never.</p> <p>3 Q And you said that they were each victims</p> <p>4 of domestic violence both in their family -- they</p> <p>5 were each victims of domestic violence in their</p> <p>6 families.</p> <p>7 What did you mean by that?</p> <p>8 A They were each beaten by parents.</p> <p>9 Q And when you spoke of an all-out brawl in</p> <p>10 responding to some of Mr. Nadelhaft's questions,</p> <p>11 you didn't actually see the brawl; you just heard</p> <p>12 it described. Is that true?</p> <p>13 A That's true.</p> <p>14 Q Dr. Anderson, may I take a 15-minute</p> <p>15 break? I may be done, but giving me more time --</p> <p>16 A Sure.</p> <p>17 Q -- might actually pace in the end of the</p> <p>18 deposition.</p> <p>19 MS. BIRTJA: Before we go off the record,</p> <p>20 too. Adam, are you going to follow up?</p> <p>21 MR. NADELHAFT: I am, but it should be</p> <p>22 short. I don't expect it to be very long.</p>	<p>187</p> <p>1 December 15th?</p> <p>2 Q Yeah. Let's go back, because we want this</p> <p>3 to be clear.</p> <p>4 MR. CHEW: If we can go back very briefly</p> <p>5 to Exhibit 2.</p> <p>6 AV TECHNICIAN: Stand by.</p> <p>7 Q Page 11. And after the part where -- this</p> <p>8 refers to a session that was just you and</p> <p>9 Ms. Heard, correct?</p> <p>10 A Yes.</p> <p>11 Q And Ms. Heard had admitted that she</p> <p>12 slapped him, right?</p> <p>13 MR. NADELHAFT: Objection; form, hearsay,</p> <p>14 foundation.</p> <p>15 THE WITNESS: Yes.</p> <p>16 Q And then below that, after admitting that</p> <p>17 she slapped Mr. Depp, she refers to an alleged</p> <p>18 incident in which he bruised her face; is that</p> <p>19 correct?</p> <p>20 A Yes.</p> <p>21 Q And this call, which was just between you</p> <p>22 and Ms. Heard and not Mr. Depp involved, that</p>
<p>186</p> <p>1 MR. CHEW: Okay. So let's take -- if it's</p> <p>2 all right with Dr. Anderson, I'd like to take</p> <p>3 15 minutes.</p> <p>4 THE WITNESS: Okay.</p> <p>5 MR. CHEW: Thank you so much.</p> <p>6 THE VIDEOGRAPHER: Our time on record is 2</p> <p>7 hours 58 minutes, and we're off record at 4:21.</p> <p>8 (Recess was held.)</p> <p>9 THE VIDEOGRAPHER: On record, 4:37.</p> <p>10 BY MR. CHEW:</p> <p>11 Q Hello, again, Dr. Anderson. You know,</p> <p>12 subject to Mr. Nadelhaft's redirect, I just have a</p> <p>13 few. So I might have something after that;</p> <p>14 although, I hope not. I just had a couple of</p> <p>15 follow-up questions.</p> <p>16 I believe you testified that at some point</p> <p>17 after your telephone session with Ms. Heard on</p> <p>18 December 15, 2015, during which she reported to</p> <p>19 you during a -- just a one-on-one session that you</p> <p>20 had with her with Mr. Depp not present, that</p> <p>21 Mr. Depp bruised her face. Do you recall that?</p> <p>22 A I'm confused about the dates. You said</p>	<p>188</p> <p>1 occurred on or about December 15, 2015?</p> <p>2 A Yes.</p> <p>3 Q And was it just shortly after that call</p> <p>4 when Ms. Heard showed you pictures and actually</p> <p>5 came into your office? Is that right?</p> <p>6 A She came in on 12/17, so yes.</p> <p>7 Q So Ms. Heard came in on December 17th and</p> <p>8 you saw bruises on her face; is that correct?</p> <p>9 A I believe that's when.</p> <p>10 Q Was that bruising that you observed</p> <p>11 similar to the bruising that appeared on the</p> <p>12 photographs that she showed you?</p> <p>13 A Yes.</p> <p>14 Q So it was -- strike that.</p> <p>15 Can you remember what kind of</p> <p>16 discoloration you saw both on her face when you</p> <p>17 saw her in person and in the photographs?</p> <p>18 MS. BIRTJA: Vague as to "discoloration."</p> <p>19 You mean, like, coloring of the bruising?</p> <p>20 MR. CHEW: I will withdraw the question.</p> <p>21 Q You testified that what you saw in person</p> <p>22 was similar to what you saw in the photographs</p>

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<p>1 Amber gave you, correct? 2 A Yes. 3 Q Sitting here today, could you please 4 describe that for us as best you can. 5 MS. BIRTJA: That you saw -- that she saw 6 on her face or saw on the photo? Which one? 7 MR. CHEW: Well, she said they were 8 similar. So let's start with what she saw -- 9 Q When she came into your office on 10 December 17th, what did her face look like? 11 A What I recall is not purple, green, and 12 blue, but just a darkening. So kind of a dark -- 13 a darker gray/blue sort of thing. But I -- I'm -- 14 I don't have a photo of it. I don't remember that 15 well. 16 Q And everything else on page 11 of 17 Plaintiff's Exhibit 2 relating to the 18 December 15th session was redacted, right? 19 A Yes. 20 Q And it was redacted because there are no 21 other entries relating to physical abuse by either 22 party, correct?</p>	189	<p>1 THE WITNESS: No, it was not. Not at all. 2 Q Okay. And what was the size of the bruise 3 on her face that you observed on December 17th? 4 A Maybe like this. In more than one place. 5 Q Okay. 6 A About an inch. 7 Q You said it was in -- so is it fair to say 8 those are small bruises in more than one place? 9 MS. BIRTJA: I think she said about an 10 inch. So whatever you want to interpret "small" 11 as. But that was the size she gave. 12 Q So there was -- how many one-inch size 13 bruises were on her face that you observed? 14 A I'm not a good person to ask this question 15 to. I don't really remember. I wasn't looking to 16 memorize it. I think there is other data that 17 will support this, not from me. 18 Q Okay. All right. 19 Switching gears, you have testified -- 20 you've testified about certain insults that 21 Ms. Heard made about Johnny Depp, correct? 22 A Yes.</p>	191
<p>1 MS. BIRTJA: And just in fairness to her, 2 in my determination and my evaluation in reading 3 it, I determined that, not her. And yes, in my 4 determination, based on the language of the 5 release, I thought the remaining parts of that 6 session went beyond the scope of the release. 7 MR. NADELHAFT: Object- -- that needs -- 8 Q Is that, Dr. Anderson -- 9 MR. NADELHAFT: Form, foundation. 10 Q Is that, Dr. Anderson, consistent with 11 your understanding that there were no other 12 entries on December 15th or December 17th relating 13 to physical abuse? 14 A You know -- there was nothing about 15 physical abuse. Nothing in that next session. It 16 was all about Christmas and get -- and her 17 therapist telling her one thing. Now I -- 18 MS. BIRTJA: Okay. Don't go into the 19 details about it. 20 THE WITNESS: Right. 21 MS. BIRTJA: He just asked was it about 22 abuse. Yes or no.</p>	190	<p>1 Q Did Mr. Depp ever report that Ms. Heard 2 called him a pussy? 3 MR. NADELHAFT: Objection; hearsay. 4 THE WITNESS: Yes, he did. 5 Q Did Ms. Heard admit that? 6 MR. NADELHAFT: Objection; hearsay, form, 7 foundation. 8 THE WITNESS: I don't know that it was 9 necessary. She didn't disagree. And I don't know 10 if he told me that -- I think he told me that 11 in -- in front of her, but I'm not positive. 12 Q And you don't recall her disagreeing with 13 that? 14 A No. 15 Q Did Mr. Depp tell you that Ms. Heard had 16 called him spineless? 17 MR. NADELHAFT: Objection; form, 18 foundation, hearsay. 19 THE WITNESS: I don't remember that one. 20 Q Do you remember Mr. Depp telling you that 21 he would run away from Ms. Heard when she was 22 angry and coming at him?</p>	192

<p style="text-align: right;">193</p> <p>1 MR. NADELHAFT: Objection; form, 2 foundation, hearsay. 3 MS. BIRTJA: Maybe vague as to "run away," 4 but go ahead. 5 THE WITNESS: Not with that terminology, 6 but that he tried to de-escalate and not let her 7 catch him. He tried to get -- he tried to stop 8 what was going on, yes -- 9 BY MR. CHEW: 10 Q And -- 11 A -- until he didn't. 12 Q Yeah. Did Mr. Depp ever tell you that 13 Ms. Heard called him a coward? 14 MR. NADELHAFT: Objection; hearsay, form, 15 foundation, speculation. 16 THE WITNESS: Can't remember. 17 Q Okay. 18 MR. CHEW: All right. Well, subject to 19 any possible redirect after Mr. Nadelhaft's 20 questions, that's all I have for right now. And, 21 again, also subject to the motions that we're 22 going to have to file relating to all these</p>	<p style="text-align: right;">195</p> <p>1 about the size of it, your fingers were under your 2 eyes. Do you remember seeing the bruises under 3 Amber's eyes? 4 A That's what I recall. They may have been 5 in other places throughout her body. I don't 6 remember. But I do remember her face. 7 MR. NADELHAFT: Could we put back up 8 Plaintiff's Exhibit 2. 9 AV TECHNICIAN: Stand by. 10 MR. NADELHAFT: And can you go to page 4, 11 please. 12 Q Do you see where you write: he hits her - 13 no closed fist, she hits back? 14 Do you see that? 15 A Yes. 16 Q The "he" refers to Mr. Depp, correct? 17 A Correct. 18 Q And where it's saying "she hits back," was 19 that referring to Amber hitting back after being 20 hit by Mr. Depp? 21 A In that, yes. 22 MR. NADELHAFT: If we can turn to page 5,</p>
<p style="text-align: right;">194</p> <p>1 redactions that we talked about, and don't need to 2 talk about again, that's all I have for now. 3 And we greatly appreciate your time, 4 Dr. Anderson. 5 MR. NADELHAFT: Okay. 6 EXAMINATION 7 BY MR. NADELHAFT: 8 Q Thank you, Dr. Anderson. I have, 9 hopefully, a few minutes of questions. I don't 10 think it should take too long. 11 A few minutes ago you briefly spoke about 12 seeing bruises about an inch on Amber Heard's 13 face. Do you recall that testimony? 14 A Yes. 15 Q And you were making motions with your 16 fingers -- 17 A But I was saying multiple. I'm not saying 18 one. 19 Q Right. You were seeing multiple -- 20 multiple bruises on Amber's face, correct? 21 A Yes. 22 Q And you were -- when you were talking</p>	<p style="text-align: right;">196</p> <p>1 please. 2 THE WITNESS: One second. 3 BY MR. NADELHAFT: 4 Q Sure. 5 And then at the top of page 5 of 6 Plaintiff's Exhibit 2 it says, fights they are 7 hitting. no closed fist. when pushes is 8 dangerous. 9 Is that -- is Amber referring to Mr. Depp 10 there using no closed fist? 11 A You know what, the -- the sentence prior 12 is about hitting, so it -- it feels weird to take 13 half of a sentence. This was talking about the 14 first time, I think. And so it -- this is when 15 the violence was. I'm not sure why it was 16 redacted. 17 Q Okay. 18 A So you're asking about half a sentence. I 19 think it makes more sense to say what the violence 20 was including the other -- the beginning of the 21 sentence. 22 Q Okay. Was this referring to Mr. Depp</p>

<p style="text-align: right;">197</p> <p>1 hitting Amber?</p> <p>2 MR. CHEW: Objection; leading, assumes</p> <p>3 facts not in evidence, lack of foundation. It's</p> <p>4 also, you know, wildly unfair --</p> <p>5 MS. BIRTJA: I was going to say, it is. I</p> <p>6 did the redactions the best I could on the</p> <p>7 information.</p> <p>8 Dr. Anderson, try to keep it within that</p> <p>9 context. There are reasons for the redactions and</p> <p>10 the context for them. The question was very</p> <p>11 basic. The hitting, he's simply asking, was it</p> <p>12 Ms. Heard reporting that Johnny was -- Mr. Depp</p> <p>13 was hitting her, or is it referring to some other</p> <p>14 people?</p> <p>15 THE WITNESS: It was referring to</p> <p>16 Mr. Depp, and it was referring to her hitting</p> <p>17 back. It was referring to how the whole thing</p> <p>18 happened.</p> <p>19 Q And it was referring to Amber hitting back</p> <p>20 after being hit by Mr. Depp, correct?</p> <p>21 MR. CHEW: Objection; asked and answered,</p> <p>22 leading, argumentative.</p>	<p style="text-align: right;">199</p> <p>1 A No.</p> <p>2 Q Did Amber tell you how Mr. Depp was</p> <p>3 threatening?</p> <p>4 A She may have at the time. But these are</p> <p>5 the words she used and I'm not sure I got more</p> <p>6 detail. I don't remember.</p> <p>7 Q And Amber told that you that she was</p> <p>8 hiding in the bathroom based on whatever Mr. Depp</p> <p>9 was doing to her at the time?</p> <p>10 MR. CHEW: Objection; argumentative,</p> <p>11 leading, assumes facts not in evidence, hearsay.</p> <p>12 Q Let me ask that question again. Where you</p> <p>13 said "hid in bathroom," what -- what was your</p> <p>14 understanding as to what that note means, "hid in</p> <p>15 bathroom"?</p> <p>16 MS. BIRTJA: Understanding goes to her</p> <p>17 opinion. If you're asking --</p> <p>18 MR. NADELHAFT: Factually, what did it</p> <p>19 mean that it was reported to her.</p> <p>20 THE WITNESS: It was reporting her</p> <p>21 behavioral steps on the island at the very end</p> <p>22 when it started to go bad, and I think she was</p>
<p style="text-align: right;">198</p> <p>1 THE WITNESS: Yes.</p> <p>2 BY MR. NADELHAFT:</p> <p>3 Q Okay. You had testified before about --</p> <p>4 A That first time as it was developing kind</p> <p>5 of initially, that was what the description was.</p> <p>6 Q You had testified before about Mr. Depp</p> <p>7 telling you that he had a recording of Amber. Do</p> <p>8 you recall that testimony?</p> <p>9 A Yes.</p> <p>10 Q Did you ever see the recording?</p> <p>11 A No.</p> <p>12 MS. BIRTJA: Or hear it? But go ahead.</p> <p>13 THE WITNESS: No.</p> <p>14 Q Did you ever hear the recording?</p> <p>15 A No, no.</p> <p>16 Q If we go to page 12 of Exhibit 2 -- yeah,</p> <p>17 right there on the top there -- where it says, he</p> <p>18 got aggressive, threatening, didn't touch him, hid</p> <p>19 in bathroom, who is the "he" you're referring to?</p> <p>20 A Mr. Depp.</p> <p>21 Q And did Amber tell you how Mr. Depp was</p> <p>22 aggressive?</p>	<p style="text-align: right;">200</p> <p>1 trying to demonstrate that she exhibited</p> <p>2 self-control and stayed in the bathroom until she</p> <p>3 then threw a can at him. So she was exhibiting</p> <p>4 some control.</p> <p>5 BY MR. NADELHAFT:</p> <p>6 Q And she was exhibiting control in response</p> <p>7 to what, if you recall?</p> <p>8 A What she perceived as his being aggressive</p> <p>9 or threatening to her, and she didn't hit him.</p> <p>10 Okay? So she's kind of being a good patient and</p> <p>11 saying, Look, I didn't hit him, I went to the</p> <p>12 bathroom. And yes, I threw a can at him but,</p> <p>13 look, you know, kind of, I tried.</p> <p>14 Q Okay. If we can turn to page 13. In the</p> <p>15 blue where it says, was chaotic violent, do you</p> <p>16 know what Mr. Depp was referring to there?</p> <p>17 MR. CHEW: Objection; asked and answered.</p> <p>18 THE WITNESS: What I said previously and I</p> <p>19 will say it again, he's kind of doing a</p> <p>20 retrospective of trying to understand the</p> <p>21 relationship and is characterizing it as chaotic</p> <p>22 and violent, but she gave as good as she got and</p>

<p style="text-align: right;">201</p> <p>1 he -- and she started it, but -- you know, he's --</p> <p>2 he's complaining, but he's also just kind of</p> <p>3 describing what the relationship was. His mother</p> <p>4 is dead at this point, the relationship is not --</p> <p>5 is not good. It's over, pretty much, and he's</p> <p>6 trying to come to terms with it. And he still</p> <p>7 loves her. And he's mourning. So he's just --</p> <p>8 he's a very articulate man, and when left alone to</p> <p>9 speak, he can describe intelligently what's going</p> <p>10 on.</p> <p>11 MS. BIRTJA: And I think what he wants to</p> <p>12 know is: Chaotic and violent, was that just his</p> <p>13 words or did --</p> <p>14 THE WITNESS: No.</p> <p>15 MS. BIRTJA: What specifically did he say</p> <p>16 to get that, because I think he's trying to</p> <p>17 understand what you mean by "chaotic and violent."</p> <p>18 Correct?</p> <p>19 THE WITNESS: I think I kind of -- I think</p> <p>20 while he's talking, and I'm not trying to be</p> <p>21 obtrusive with my taking notes, I'm listening, I'm</p> <p>22 talking, but I'm also copying down a word here and</p>	<p style="text-align: right;">203</p> <p>1 foundation. It also goes to opinion testimony as</p> <p>2 to what she understood. But you've refused to pay</p> <p>3 her this whole time and she's agreed to testify.</p> <p>4 So go ahead.</p> <p>5 THE WITNESS: Right, I have.</p> <p>6 She initiated fights, she started</p> <p>7 violence, she rose to the challenge if he started</p> <p>8 first, which I -- and so she -- in my opinion,</p> <p>9 that had been established throughout the</p> <p>10 relationship, that she fought as hard as he did.</p> <p>11 And he tried to de-escalate far more than I think</p> <p>12 she did. So --</p> <p>13 BY MR. NADELHAFT:</p> <p>14 Q But Mr. Depp -- I'm sorry. I didn't mean</p> <p>15 to cut you off.</p> <p>16 A That's okay. What?</p> <p>17 Q You understood that Mr. Depp also started</p> <p>18 fights, correct?</p> <p>19 MR. CHEW: Objection; calls for</p> <p>20 speculation. She's already testified she didn't</p> <p>21 witness any violence by Mr. Depp or by Ms. Heard.</p> <p>22 She only knows what was reported to her.</p>
<p style="text-align: right;">202</p> <p>1 there. So my belief is that those are his words.</p> <p>2 BY MR. NADELHAFT:</p> <p>3 Q And when he's talking about "chaotic and</p> <p>4 violent," he's talking about the relationship with</p> <p>5 Amber, correct?</p> <p>6 A Yes.</p> <p>7 MR. CHEW: Objection; argumentative,</p> <p>8 leading, assumes facts not in evidence.</p> <p>9 THE WITNESS: Yes, he is.</p> <p>10 Q And Mr. Depp -- I think you testified</p> <p>11 about this, but I just want to make sure we're</p> <p>12 clear. Mr. Depp told you Amber gave as good as</p> <p>13 she got, correct?</p> <p>14 A Correct.</p> <p>15 Q Did you ask what Mr. Depp meant by "gave</p> <p>16 as good as she got"?</p> <p>17 A I was pretty aware of what he meant. I</p> <p>18 agreed.</p> <p>19 Q What did you understand Mr. Depp to mean?</p> <p>20 MR. CHEW: Objection; calls for</p> <p>21 speculation.</p> <p>22 MS. BIRTJA: It does. May lack</p>	<p style="text-align: right;">204</p> <p>1 THE WITNESS: Well --</p> <p>2 MS. BIRTJA: Just go and tell him what was</p> <p>3 reported to you.</p> <p>4 THE WITNESS: Yes.</p> <p>5 Ms. Heard reported that there was a</p> <p>6 blissful period of time, and at some point the</p> <p>7 violence started where he slapped her, and then</p> <p>8 she was not going to let that be okay and she</p> <p>9 fought back, and that -- and that's what proceeded</p> <p>10 to happen recurringly.</p> <p>11 BY MR. NADELHAFT:</p> <p>12 Q Okay. And the note where you talked about</p> <p>13 his fingertip and his chin, this is -- this note</p> <p>14 is from June 18, 2016, correct?</p> <p>15 A Yes. Well, I think so. If it says so,</p> <p>16 yes.</p> <p>17 Q Right. That's what it says on the top --</p> <p>18 A Yes.</p> <p>19 Q -- on the top of page 13, correct?</p> <p>20 A Yes, I see it.</p> <p>21 Q Do you know -- did Mr. Depp talk about his</p> <p>22 fingertip with you before June 18, 2016?</p>

<p style="text-align: right;">205</p> <p>1 A No, because I would have written it when 2 he first mentioned it to me. 3 Q Did you ever see Mr. Depp with an injury 4 to his finger during any of your sessions with 5 Mr. Depp or -- 6 A During that -- 7 Q -- counseling or, you know, sessions 8 together with Amber Heard? 9 A During that session, yes, he showed me. 10 Q On June 18, 2016. But before June 18, 11 2016, did you ever see an injury to Mr. Depp's 12 finger? 13 A No. But in -- yes. No, I didn't. 14 MR. CHEW: And you finished your answer 15 or... 16 MR. NADELHAFT: I think she said, No, I 17 didn't. 18 THE WITNESS: No, I didn't, right. 19 Q Okay. 20 MR. NADELHAFT: Okay. Could we turn to 21 Exhibit 6, please. 22 MS. BIRTJA: Whose Exhibit 6?</p>	<p style="text-align: right;">207</p> <p>1 A It was that he was talking about 2 wanting -- or being with another woman, yes, and 3 was coherent and was -- his mother had just died 4 and he was drunk, I think, or high on something. 5 Q And on the last page of Exhibit -- 6 Plaintiff's Exhibit 6 you wrote: They each 7 engaged in this behavior and were each victims of 8 domestic violence, both in their families of 9 origin and in their marriage. 10 You wrote that, correct? 11 A I did. 12 Q And you meant that Amber Heard was a 13 victim of domestic abuse in her marriage to 14 Mr. Depp, correct? 15 MR. CHEW: Objection; argumentative, 16 misstates the testimony. She has testified 17 several times she never witnessed any physical 18 violence by Ms. Heard or Mr. Depp, although 19 Ms. Heard admitted it several times to her. 20 MS. BIRTJA: Also, it is an ultimate 21 opinion question that, based on her treatment, she 22 came to that conclusion and opinion. So that is</p>
<p style="text-align: right;">206</p> <p>1 MR. NADELHAFT: Plaintiff's Exhibit 6, I'm 2 sorry. This one. 3 BY MR. NADELHAFT: 4 Q If you turn to page 2, please, you wrote: 5 She reported his having hit her first, open 6 handed, after he started drinking after six to 7 nine months of being together. 8 You wrote that, correct? 9 A I did. 10 Q And this report is the same report you 11 were talking about in the notes that we were just 12 talking about, correct, the first time Mr. Depp 13 had hit Amber? 14 MR. CHEW: Objection; argumentative, 15 leading, vague. 16 THE WITNESS: Yes. 17 Q If we turn to page 3 where you write: She 18 reported trying to initiate a fight with him one 19 night, by slapping him, when she was offended by 20 what he said, is that the same incident you were 21 talking about where Amber had reported to you that 22 Mr. Depp was incoherent?</p>	<p style="text-align: right;">208</p> <p>1 an opinion question, it's not a factual question, 2 it's her ultimate conclusion. So as phrased, you 3 are asking for an expert opinion, not factual 4 testimony, which she would be entitled to 5 compensation for. 6 BY MR. NADELHAFT: 7 Q What did you mean where you wrote: They 8 each engaged in this behavior and were each 9 victims of domestic violence, both in their 10 families of origin and in their marriage? 11 MS. BIRTJA: Again -- 12 Q You wrote it. You didn't -- I -- 13 MS. BIRTJA: And she confirmed she wrote 14 it. 15 MR. NADELHAFT: Okay. 16 MS. BIRTJA: The document speaks for 17 itself. If you want her to explain what she meant 18 and how she came to that conclusion, that goes 19 directly to her treatment and diagnosis, which was 20 in the case law we gave you that specifically 21 entitles her to -- I'm not telling her not to 22 answer, you just have to pay her for it.</p>

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1 MR. CHEW: And she's not been -- we've
 2 already had our expert designations. The time for
 3 designating experts has come and gone.
 4 MR. NADELHAFT: That's why I'm not --
 5 okay.
 6 BY MR. NADELHAFT:
 7 Q Let me ask you another -- we haven't --
 8 I'm trying not to make you an expert. Where you
 9 put -- where you wrote "marriage," what marriage
 10 were you referring to?
 11 A Theirs.
 12 Q "Theirs" being Mr. Depp's and Amber
 13 Heard's, correct?
 14 A Yes.
 15 Q And in working with Amber Heard, did she
 16 report to you that she believed she was a victim
 17 of domestic abuse at the hands of Mr. Depp?
 18 MR. CHEW: Objection; leading,
 19 argumentative.
 20 MS. BIRTJA: Solely as to what her beliefs
 21 were, not to any of your conclusions or diagnosis
 22 or determinations. Go ahead.

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1 MR. CHEW: Well, not her beliefs, what she
 2 said. Who knows what her beliefs are.
 3 MS. BIRTJA: That's true. It's
 4 speculative. But based on what was reported to
 5 you, without going into your own diagnosis and
 6 conclusions or determinations, what was reported?
 7 THE WITNESS: Well, that she -- yes,
 8 that -- that regardless of her role in it, that
 9 she was a victim. She -- she must have felt that
 10 at some level.
 11 MR. NADELHAFT: Okay. Thank you,
 12 Dr. Anderson. I have no further questions.
 13 MR. CHEW: And I would have one.
 14 EXAMINATION
 15 BY MR. CHEW:
 16 Q When we were going through Amber's -- the
 17 incidents where Amber described Mr. Depp being
 18 violent, Mr. Depp was not present, correct?
 19 A That's true.
 20 MR. CHEW: I have no further questions.
 21 Thank you so much.
 22 MR. NADELHAFT: And just -- we're going to

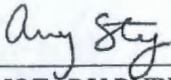
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1 make the deposition confidential.
 2 MS. BIRTJA: I was going to ask that. And
 3 then are we going per the code in California since
 4 it is a California subpoena and following the
 5 production, reviewing and signing per California
 6 law?
 7 MR. NADELHAFT: Yes.
 8 MS. BIRTJA: I'm -- I don't know, but I'm
 9 assuming you two aren't California licensed and
 10 there are guidelines the court reporters have to
 11 follow. And if we don't go per code, we have to
 12 do a stipulation. So I just want --
 13 MR. NADELHAFT: Why don't -- could we -- I
 14 don't want to drag this out, but let me consult
 15 with my California counsel. Half of our counsel
 16 in this case are from California, so I will --
 17 MS. BIRTJA: Just so you know that per
 18 code is pretty standard. They get -- the court
 19 reporter produces it, she gets X amount of days to
 20 sign and review it and return it, and then the
 21 court reporter maintains custody and control of
 22 it.

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1 MR. CHEW: Well, that's the way it works
 2 in Virginia as well.
 3 MR. NADELHAFT: Yeah. That's fine.
 4 MS. BIRTJA: I just don't know your laws
 5 and so --
 6 MR. NADELHAFT: Thank you, Michelle.
 7 Appreciate that.
 8 THE REPORTER: This is the court reporter.
 9 It's the same in Virginia.
 10 MR. CHEW: That's what I thought. I just
 11 wanted to make sure. Thank you, Amy.
 12 MR. NADELHAFT: Thank you, Amy.
 13 THE VIDEOGRAPHER: Anything else before we
 14 close?
 15 MR. NADELHAFT: Nothing here.
 16 THE VIDEOGRAPHER: The time is 5:03, and
 17 this concludes today's deposition of Laurel
 18 Anderson, Ph.D. We're off the record.
 19 (Off the record at 5:03 p.m.)
 20
 21
 22

Conducted on February 21, 2022

<p style="text-align: right;">213</p> <p>1 ACKNOWLEDGMENT OF DEPONENT 2 I, LAUREL ANDERSON, PH.D., CCN, do hereby 3 acknowledge that I have read and examined the 4 foregoing testimony, and the same is a true, 5 correct and complete transcription of the 6 testimony given by me and any corrections appear 7 on the attached Errata sheet signed by me. 8 9 10</p> <hr/> <p>11 (DATE) (SIGNATURE) 12 13 14 15 16 17 18 19 20 21 22</p>	
<p style="text-align: right;">214</p> <p>1 CERTIFICATE OF SHORTHAND REPORTER 2 NOTARY PUBLIC 3 I, AMY STRYKER, Certified Court Reporter 4 and Notary Public, the officer before whom the 5 foregoing deposition was taken, do hereby certify 6 that the foregoing transcript is a true and 7 correct record of the proceedings; that said 8 testimony was taken by me stenographically and 9 thereafter reduced to typewriting under my 10 supervision; that reading and signing was 11 requested; and that I am neither counsel for nor 12 related to, nor employed by any of the parties to 13 this case and have no interest, financial or 14 otherwise, in its outcome. 15 IN WITNESS WHEREOF, I have hereunto set my 16 hand and affixed my notarial seal this 23rd day of 17 February, 2022. 18 My commission expires November 18, 2023. 19 20  21 _____ 22 NOTARY PUBLIC IN AND FOR THE STATE OF MARYLAND</p>	