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**CONFIDENTIAL - PURSUANT TO THE PROTECTIVE
ORDER**

Transcript of Edward White

Date: February 2, 2022
Case: Depp, II -v- Heard

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WORLDWIDE COURT REPORTING & LITIGATION TECHNOLOGY

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VIRGINIA:

IN THE CIRCUIT COURT FOR FAIRFAX COUNTY

----- x

JOHN C. DEPP, II, :
Plaintiff, : Case No.
v. : CL-2019-0002911
AMBER LAURA HEARD, :
Defendant. :

----- x

THIS TRANSCRIPT HAS BEEN MARKED CONFIDENTIAL

PURSUANT TO THE PROTECTIVE ORDER

Videotaped Deposition of EDWARD WHITE

Conducted Remotely via Zoom

Wednesday, February 2, 2022

12:33 p.m. Eastern Time

Job No.: 428527

Pages: 1 - 169

Reported By: AMY L. STRYKER, CCR

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Videotaped Deposition of EDWARD WHITE,
conducted remotely.

Pursuant to subpoena, before AMY L.
STRYKER, Certified Court Reporter and Notary
Public of the State of Maryland.

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A P P E A R A N C E S

ON BEHALF OF PLAINTIFF JOHN C. DEPP:

LEO J. PRESIADO, ESQ.

CAMILLE M. VASQUEZ, ESQ.

SAMUEL A. MONIZ, ESQ.

BROWN RUDNICK LLP

2211 Michelson Drive

Irvine, California 92612

(949) 752-7100

ON BEHALF OF DEFENDANT AMBER LAURA HEARD:

J. BENJAMIN ROTTENBORN, ESQ.

WOODS ROGERS, PLC

10 South Jefferson Street

Suite 1800

Roanoke, Virginia 24011

(540) 983-7600

ALSO PRESENT:

CATHERINE GONZALEZ, AV Technician

KIMBERLY JOHNSON, Videographer

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Transcript of Edward White

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C O N T E N T S

EXAMINATION OF EDWARD WHITE PAGE

By Mr. Rottenborn 7

E X H I B I T S

(Attached to transcript)

WHITE DEPOSITION EXHIBITS

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1	P R O C E E D I N G S .	12:33:26
2	THE VIDEOGRAPHER: Here begins the video	12:33:26
3	recorded deposition of Edward White taken in the	12:33:41
4	matter of Depp vs. Heard in the Circuit court --	12:33:43
5	Court of Fairfax County, Virginia, Case No.	12:33:47
6	CL-2019-0002911.	12:33:53
7	Today's date is February 2, 2022. The	12:33:54
8	time is 12:33 Eastern Time. This deposition is	12:33:58
9	being held in different locations via Zoom. The	12:34:03
10	court reporter is Amy Stryker, the video camera	12:34:06
11	operator is Kim Johnson; both are on behalf of	12:34:09
12	Planet Depos.	12:34:12
13	Will counsel please introduce yourselves	12:34:13
14	and state whom you represent.	12:34:15
15	MR. ROTTENBORN: This is Ben Rottenborn	12:34:15
16	here on behalf of Amber Heard.	12:34:18
17	MR. PRESIADO: Good morning. Leo Presiado	12:34:20
18	for Mr. Depp. I'm also representing the deponent,	12:34:22
19	Mr. White, today. Camille Vasquez and Sam Moniz	12:34:24
20	from my office will be attending as well.	12:34:27
21	THE VIDEOGRAPHER: Okay. Will the court	
22	reporter please swear in the witness.	

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Transcript of Edward White
Conducted on February 2, 2022

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1	EDWARD WHITE,	
2	after having been duly sworn, testified as	
3	follows:	
4	EXAMINATION	
5	BY MR. ROTTENBORN:	12:34:52
6	Q Good morning, Mr. White. Where are you	12:34:52
7	physically located today for the deposition?	12:34:55
8	A In Los Angeles, California; specifically	12:34:57
9	Woodland Hills, California.	12:35:01
10	Q Okay. Are you in your office?	12:35:02
11	A Yes. I'm in my office, my personal	12:35:04
12	office.	12:35:07
13	Q Okay. Are you -- can you hear me okay?	12:35:08
14	A Yes, I can.	12:35:11
15	Q Okay. If you ever can't, just let me	12:35:11
16	know. Okay?	12:35:15
17	A Fine. Thank you.	12:35:15
18	Q Thank you.	12:35:16
19	Are you -- do you reside in California? I	12:35:18
20	don't want to know your address, just	12:35:22
21	California --	12:35:23
22	A Yes.	12:35:23

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Transcript of Edward White

Conducted on February 2, 2022

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1	Q -- is where you live.	12:35:23
2	A Yes, I do.	12:35:24
3	Q What town?	12:35:25
4	A I live in Los Angeles, California,	12:35:27
5	specifically Bel Air, California.	12:35:30
6	Q Have you ever given a deposition before?	12:35:34
7	A Yes.	12:35:36
8	Q How many times?	12:35:38
9	A Numerous. I do not recall the specific	12:35:40
10	amount.	12:35:42
11	Q Have you ever testified as an expert	12:35:45
12	witness before?	12:35:47
13	A Yes.	12:35:48
14	Q How many times?	12:35:50
15	A Several. I do not recall the specific	12:35:51
16	number.	12:35:54
17	Q Are you -- to your knowledge, are you	12:35:56
18	testifying as an expert witness in this case?	12:35:58
19	MR. PRESIADO: Object to the extent it	12:36:01
20	calls for a legal conclusion.	12:36:02
21	Q You can answer.	12:36:07
22	MR. PRESIADO: You can answer, if you	12:36:08

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Transcript of Edward White
Conducted on February 2, 2022

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1	know.	12:36:08
2	THE WITNESS: No.	12:36:08
3	BY MR. ROTTENBORN:	12:36:14
4	Q Have you been paid for any of the	12:36:14
5	testimony that you plan to give in this case?	12:36:16
6	A I charge all of my time that I incur in	12:36:19
7	connection with the legal proceedings, including	12:36:24
8	this deposition.	12:36:26
9	Q So you're charging this deposition to	12:36:27
10	Mr. Depp?	12:36:33
11	A Yes.	12:36:33
12	Q What's your -- is it an hourly rate that	12:36:38
13	you're charging?	12:36:41
14	A It is an hourly rate, and my rate is \$710	12:36:41
15	per hour.	12:36:44
16	Q So you're getting paid \$710 per hour for	12:36:45
17	the testimony that you're giving today?	12:36:50
18	MR. PRESIADO: Objection; misstates	12:36:53
19	testimony. I -- I'll leave it at that.	12:36:55
20	THE WITNESS: Would you repeat the	12:37:01
21	question, please.	12:37:01
22	Q You're being paid \$710 an hour for the	12:37:02
MS		

CONFIDENTIAL - PURSUANT TO THE PROTECTIVE ORDER
Transcript of Edward White
Conducted on February 2, 2022

10

MS¹

testimony that you're giving today?

12:37:05

2

MR. PRESIADO: Objection; misstates

12:37:07

3

testimony.

12:37:08

4

THE WITNESS: In response to your inquiry,

12:37:15

5

I am being paid on an hourly basis for the

12:37:17

6

services I render for Mr. Depp, and this is a

12:37:20

7

service I'm rendering in connection with my

12:37:23

8

engagement with him.

12:37:25

9

Q And did you get paid for -- the \$710 an

12:37:28

10

hour for the time that you spent prepping for this

12:37:32

11

deposition?

12:37:34

12

A I spent very little time prepping for the

12:37:36

13

deposition. But to the extent I spent time, the

12:37:38

14

answer is yes.

12:37:41

15

Q What did you -- can you confirm, are you

12:37:46

16

being represented today by anyone other than

12:37:48

17

Mr. Presiado or his firm?

12:37:52

18

A No.

12:37:54

19

Q What did you do to prepare for the

12:37:56

20

deposition today?

12:37:59

21

MR. PRESIADO: Objection to the extent it

12:38:02

22

calls for attorney-client communications.

12:38:03

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Transcript of Edward White

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1 Mr. White, I just want to remind you that 12:38:05
2 any discussions you had with me or anybody at my 12:38:07
3 firm is confidential and privileged, attorney- 12:38:10
4 client privilege. So if you can answer that 12:38:15
5 question without divulging those communications, 12:38:16
6 please do so. 12:38:19

7 THE WITNESS: I spent very little time 12:38:20
8 preparing for this deposition. I reviewed just a 12:38:22
9 few documents, and hopefully that's responsive to 12:38:26
10 your inquiry. 12:38:30

11 BY MR. ROTTENBORN: 12:38:31

12 Q What did you review? 12:38:31

13 MR. PRESIADO: Mr. Rottenborn, before 12:38:35
14 you -- we moved off the compensation issues, and I 12:38:37
15 just did want to point out, although Mr. White 12:38:40
16 didn't indicate it, that he was paid by your firm 12:38:43
17 on a statutory fee. I apologize for interrupting. 12:38:46
18 Would you like the question read back or would you 12:38:54
19 just like to repeat it? 12:38:59

20 MR. ROTTENBORN: I'll go ahead and repeat 12:39:00
21 it. Thanks, Leo. 12:39:02

22 Q What -- and, again, I'm not trying to get 12:39:04

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Transcript of Edward White

Conducted on February 2, 2022

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1	into any communications you had with your	12:39:06
2	attorneys, but -- so to the extent you can answer	12:39:07
3	without divulging that, what documents did you	12:39:09
4	review in preparation for this deposition?	12:39:11
5	A I mentioned just a few documents. Two	12:39:13
6	that I recall reviewing were the declarations that	12:39:18
7	I submitted, and my testimony during the trial in	12:39:20
8	London.	12:39:26
9	Q And you gave that testimony by video link;	12:39:27
10	is that right?	12:39:34
11	A That's correct.	12:39:35
12	Q Can you just walk me through your	12:39:37
13	professional background.	12:39:41
14	A I'm a certified public accountant. I have	12:39:45
15	a master's degree in business administration from	12:39:48
16	the University of Southern California. Also have	12:39:50
17	postgraduate studies in taxation.	12:39:53
18	I commenced my career at Pricewaterhouse.	12:39:56
19	I was formerly a professor at a university here	12:39:59
20	based in Los Angeles. I have over 45 years of	12:40:02
21	experience. And I'm the founding and senior	12:40:09
22	partner of Edward White & Company, certified	12:40:11

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Transcript of Edward White

Conducted on February 2, 2022

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1	public accountants, which is a peer-reviewed firm	12:40:16
2	and fully bonded.	12:40:18
3	Q When did you found Edward White & Company?	12:40:22
4	A A little over 45 years ago.	12:40:25
5	Q Did you found that straight out of	12:40:29
6	PricewaterhouseCoopers?	12:40:33
7	A It was Pricewaterhouse then, and the	12:40:35
8	answer is yes.	12:40:39
9	Q How many employees work for you -- or with	12:40:39
10	you?	12:40:42
11	A Approximately 20.	12:40:42
12	Q And of those, how many -- I'm just trying	12:40:43
13	to get a sense of -- sort of the structure of your	12:40:49
14	office. If you -- how many of those are CPAs?	12:40:52
15	A I'd have to count. About -- I'd say about	12:40:57
16	a dozen certified public accountants, and the rest	12:41:03
17	would be either full charge bookkeepers or	12:41:06
18	administrative personnel.	12:41:09
19	Q How many, roughly, order of magnitude,	12:41:12
20	clients do you service?	12:41:19
21	A We represent approximately 100 clients who	12:41:20
22	are high-net-worth individuals, and the companies	12:41:26

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Transcript of Edward White

Conducted on February 2, 2022

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1	that they own and operate. We also provide	12:41:28
2	services for governmental agencies. We've done	12:41:32
3	work for the Department of Justice, the State of	12:41:35
4	Alaska, the State of California, the City of Long	12:41:37
5	Beach.	12:41:40
6	In addition to that, we, from time to	12:41:41
7	time, are engaged by national law firms to provide	12:41:43
8	forensic studies and to opine on our findings.	12:41:47
9	Q And how many --	12:41:51
10	MR. PRESIADO: Ben, before your next	12:41:54
11	question, I just wanted to preempt an issue, and	12:41:56
12	that is that the deponent is under no obligation	12:41:58
13	to disclose any of his clients other than	12:42:01
14	Mr. Depp, and I'd caution him not to on	12:42:03
15	confidentiality grounds.	12:42:07
16	To the extent you -- and I'll leave it at	12:42:08
17	that. I assume you don't -- won't be asking him	12:42:10
18	that --	12:42:12
19	MR. ROTTENBORN: (Inaudible.)	12:42:12
20	MR. PRESIADO: -- but I just want to -- I	12:42:13
21	agree, I just wanted to caution the witness.	12:42:14
22	MR. ROTTENBORN: No, I want to respect	12:42:16

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Transcript of Edward White

Conducted on February 2, 2022

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1	those confidentiality concerns, and I don't think	12:42:18
2	they have any relevance to this case, so I agree.	12:42:20
3	MR. PRESIADO: Thank you. Appreciate	12:42:23
4	that.	12:42:24
5	MR. ROTTENBORN: To the extent -- they	12:42:26
6	don't have any relevance in the case to the extent	12:42:28
7	of my questioning for Mr. White. Obviously, they	12:42:30
8	may be relevant in other ways at some point. But	12:42:33
9	sitting here today, I don't have any -- any reason	12:42:35
10	to ask him that.	12:42:37
11	MR. PRESIADO: Understood.	12:42:38
12	BY MR. ROTTENBORN:	12:42:39
13	Q Do you -- how many of you -- including you	12:42:39
14	and your coworkers, colleagues, how many people	12:42:46
15	work on Mr. Depp's account? And when I say --	12:42:49
16	MR. PRESIADO: Objection.	12:42:49
17	MR. ROTTENBORN: -- "Mr. Depp," I'm asking	12:42:56
18	about Scaramanga and his other companies as well.	12:42:57
19	MR. PRESIADO: Objection; vague and	12:42:59
20	ambiguous as to the term works on.	12:43:00
21	You can answer, if you understand.	12:43:03
22	THE WITNESS: Approximately six people	12:43:05

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Transcript of Edward White

Conducted on February 2, 2022

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1	provide recurring services for Mr. Depp and his	12:43:08
2	related entities.	12:43:10
3	BY MR. ROTTENBORN:	12:43:16
4	Q Stated much more artfully than my	12:43:16
5	question, so thank you. Who -- who are those	12:43:19
6	people?	12:43:22
7	A Well, there are tax people who provide tax	12:43:25
8	analysis and perform the compliance procedures.	12:43:30
9	Sharon Hope (ph) would be one of them. She's a	12:43:35
10	tax manager with a graduate degree in taxation.	12:43:37
11	Richard Finnstrom is another person. He also has	12:43:42
12	a graduate degree in taxation. Troy Schmidt	12:43:46
13	provides services. Larry Leavitt, who is also a	12:43:49
14	graduate, has his MBA. All of these people	12:43:53
15	provide services, and they're augmented by	12:43:57
16	bookkeeping personnel.	12:43:59
17	Q Have you spoken with Mr. Depp or any of	12:44:01
18	his agents, not including his attorneys, in	12:44:11
19	preparation for this deposition today?	12:44:15
20	MR. PRESIADO: One second. I just want to	12:44:19
21	caution the witness.	12:44:21
22	Mr. White, to the extent he asks you about	12:44:22

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Transcript of Edward White

Conducted on February 2, 2022

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1	conversations you've had with Mr. -- Mr. Depp --	12:44:24
2	as a matter of fact, conversations you've had with	12:44:27
3	anybody, to the extent an attorney was involved in	12:44:29
4	those conversations, they're privileged, even	12:44:31
5	though you were speaking primarily with Mr. Depp	12:44:34
6	at the time. Do you understand that?	12:44:36
7	THE WITNESS: Yes, I do understand it.	12:44:38
8	And my response to your question is no.	12:44:40
9	BY MR. ROTTENBORN:	12:44:40
10	Q Have you spoken with anyone else other	12:44:46
11	than attorneys or at the direction of attorneys in	12:44:48
12	preparation for this deposition?	12:44:50
13	A No.	12:44:52
14	Q When was the last time you spoke with Adam	12:44:54
15	Waldman?	12:45:00
16	A I do not recall, but it was not recently.	12:45:00
17	Q What kind of -- just generally speaking,	12:45:02
18	what kind of services do you provide Mr. Depp?	12:45:10
19	A Yeah. We provide a plethora of services,	12:45:13
20	including, but not limited to, data entry, a	12:45:20
21	compilation of information, organization of the	12:45:25
22	data, presenting of financial information to	12:45:29

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Transcript of Edward White
Conducted on February 2, 2022

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1	Mr. Depp and other parties where deemed	12:45:32
2	appropriate. We do tax planning, related	12:45:35
3	compliance services. We arrange for financing, we	12:45:38
4	address insurance issues and other business-	12:45:43
5	related matters that require our attention.	12:45:46
6	Q I'm going to show you a document that	12:45:49
7	we'll mark as Exhibit 1.	12:45:55
8	MR. ROTTENBORN: Catherine, if you can	12:45:58
9	please pull up the document titled Depp 18417	12:45:59
10	to --	12:46:07
11	AV TECHNICIAN: Please stand by.	12:46:08
12	MR. ROTTENBORN: Thanks.	12:46:11
13	MR. PRESIADO: And, Mr. White, to the	12:46:12
14	extent you're shown documents in this deposition,	12:46:14
15	you're entitled to review -- you're entitled to	12:46:17
16	take as much time as you'd like to review the	12:46:18
17	document before any questions are asked, and	12:46:20
18	you're entitled to review every page of the	12:46:20
19	document if you so choose before any question is	12:46:22
20	asked. Do you understand that?	12:46:26
21	THE WITNESS: Yes.	12:46:28
22	(Exhibit 1, Agreement between Edward White	12:46:34

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Transcript of Edward White

Conducted on February 2, 2022

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1	& Co., LLP and John Christopher Depp, II, and	12:46:34
2	invoices, Bates Nos. DEPP00018417 through	12:46:34
3	DEPP00018507, was marked for identification and is	12:46:34
4	attached to the transcript.)	12:46:41
5	AV TECHNICIAN: Exhibit 1.	12:46:41
6	BY MR. ROTTENBORN:	12:46:42
7	Q And, Mr. White, I'll go ahead and ask my	12:46:42
8	first question so you -- as Leo said, review as	12:46:52
9	much of it as you want or need to. My question	12:46:56
10	for you --	12:47:00
11	MR. PRESIADO: And, Ben, he's not able to	12:47:00
12	scroll through unless to the extent -- he'll guide	12:47:02
13	you to the extent he needs to review subsequent	12:47:05
14	pages. I can show him what he's asking for.	12:47:07
15	MR. ROTTENBORN: Sure. Yeah, of course.	12:47:12
16	Thank you. We're all working through this virtual	12:47:14
17	world as best we can, so if you need to see any	12:47:20
18	other part of the document, Mr. White, just let us	12:47:22
19	know.	12:47:25
20	AV TECHNICIAN: Counsel, this is the tech.	12:47:25
21	MR. ROTTENBORN: Yeah.	12:47:25
22	AV TECHNICIAN: And if anyone needs remote	12:47:25

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Transcript of Edward White

Conducted on February 2, 2022

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1	control, just please let me know.	12:47:27
2	MR. ROTTENBORN: Thank you.	12:47:29
3	THE WITNESS: Yeah.	12:47:32
4	MR. PRESIADO: I'm sorry, Ben.	12:47:33
5	Thank you for that, Catherine. Can you	12:47:34
6	give control to Ms. Vasquez, please.	12:47:36
7	Go ahead, Ben.	12:47:47
8	BY MR. ROTTENBORN:	12:47:48
9	Q Is this document the engagement Agreement	12:47:48
10	between your firm and Mr. Depp and its related	12:47:50
11	entities?	12:47:53
12	MR. ROTTENBORN: You can stop there.	12:48:22
13	Q I guess I should say: Is the document up	12:48:23
14	through that page, page 18419, the engagement	12:48:24
15	Agreement between your firm and Mr. Depp and his	12:48:30
16	related entities?	12:48:35
17	A Yes.	12:48:36
18	Q If you go to the first page of the	12:48:36
19	document, does that paragraph 2 encompass,	12:48:41
20	generally, the work or services that your firm	12:48:48
21	provides Mr. Depp and his entities?	12:48:51
22	A Yes.	12:49:23

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Transcript of Edward White

Conducted on February 2, 2022

21

1 Q And if you go to page -- we'll start with 12:49:23
2 Depp 18420. It's about the fourth page down. 12:49:32
3 And, Mr. White, you can take a look at all these, 12:49:40
4 but is this an invoice for services that your firm 12:49:42
5 provided to Mr. Depp? 12:49:47
6 A It -- it certainly could be. It's 12:49:49
7 redacted and I can't absolutely confirm. But this 12:49:58
8 would be a type of statement that we would produce 12:50:01
9 on a recurring basis. 12:50:05
10 Q Okay. Thank you. And just to save us 12:50:07
11 some time, you're welcome to look at anything, but 12:50:10
12 I'll represent to you that it looks like the 12:50:13
13 entirety of every invoice that's contained in this 12:50:16
14 document is redacted. And my question for you is: 12:50:19
15 Are those redactions that were in the document 12:50:23
16 that you -- the invoices that you would have sent 12:50:29
17 to Mr. Depp -- 12:50:31
18 MR. PRESIADO: Objection. I'm sorry. I 12:50:33
19 thought you were done with your question, Ben. Go 12:50:36
20 ahead. 12:50:38
21 Q Does -- were those redactions in the 12:50:40
22 documents that you would have sent to Mr. Depp? I 12:50:43

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Transcript of Edward White
Conducted on February 2, 2022

22

1	assume not.	12:50:45
2	A Any statements that went to Mr. Depp were	12:50:49
3	not redacted.	12:50:50
4	Q Did you make these redactions?	12:50:51
5	MR. PRESIADO: Objection; calls for	12:50:58
6	attorney-client communication.	12:51:00
7	And I instruct you not to answer that,	12:51:03
8	Mr. White.	12:51:05
9	MR. ROTTENBORN: I think -- I think if he	12:51:06
10	didn't make the redactions, I don't think there's	12:51:08
11	any communication there that's privileged or not.	12:51:10
12	I think he's allowed to answer whether or not he	12:51:13
13	made the redactions.	12:51:15
14	MR. PRESIADO: But the question is posed	12:51:16
15	such that an answer divulges attorney-client	12:51:18
16	communication, just as you indicated. Depending	12:51:22
17	on his answer, he was either in communication or	12:51:25
18	not, which violates the privilege.	12:51:27
19	MR. ROTTENBORN: The absence of a	12:51:30
20	communication doesn't violate the privilege.	12:51:31
21	Q But, obviously, Mr. White, you listen to	12:51:33
22	your attorney. I'll ask it one more time just so	12:51:35

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Transcript of Edward White
Conducted on February 2, 2022

23

1	we have a clear record. Did you make these	12:51:38
2	redactions?	12:51:41
3	A I've been advised by counsel --	12:51:43
4	MR. PRESIADO: Same objection.	12:51:44
5	THE WITNESS: -- to not respond.	12:51:45
6	MR. PRESIADO: And, Ben, just for the	12:51:46
7	record, our firm did the revision -- did the	12:51:48
8	redacting, to answer your question, as is	12:51:50
9	customary in litigation.	12:51:58
10	Q Did your -- when I -- and I'm not going to	12:52:04
11	ask you to pull out a calculator, Mr. White. But	12:52:11
12	when I totaled the -- well, actually, let's do	12:52:13
13	this: Would you agree that the documents starting	12:52:16
14	at 18420 through the end of this PDF, which is	12:52:21
15	18507, are invoices sent by your firm for services	12:52:27
16	provided to Mr. Depp or his related entities?	12:52:37
17	MR. PRESIADO: Hang on. We'll scroll	12:52:41
18	through so he can research -- answer with	12:52:43
19	certainty.	12:52:47
20	And, Catherine, if you can give	12:52:50
21	Ms. Vasquez control again. Thank you.	12:52:52
22	AV TECHNICIAN: Yes.	12:52:54

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Transcript of Edward White

Conducted on February 2, 2022

24

1	Ms. Vasquez, if you click the screen.	12:52:54
2	MR. PRESIADO: I think a way to speed this	12:54:25
3	up, perhaps, Ben, is if the invoices are	12:54:28
4	consecutive in terms of month by month, year after	12:54:31
5	year, which I assume they are, perhaps you can --	12:54:35
6	with that assumption, he can answer the question,	12:54:42
7	if that works for you, Ben.	12:54:45
8	MR. ROTTENBORN: We only have ten more	12:54:47
9	pages. Let's just go through them.	12:54:48
10	MR. PRESIADO: Okay.	12:54:50
11	BY MR. ROTTENBORN:	12:55:06
12	Q So having seen those, Mr. White, I'll just	12:55:06
13	repeat my question: Are those invoices that your	12:55:08
14	firm sent to Mr. Depp or his related entities for	12:55:11
15	services performed?	12:55:13
16	A They appear to be invoices. As I said	12:55:14
17	earlier, the narrative is redacted. But they	12:55:18
18	certainly fit the format of the invoices that our	12:55:23
19	firm would render.	12:55:26
20	Q Okay. Now, I'm not going to ask you to	12:55:27
21	pull out a calculator, but when I did some --	12:55:31
22	some -- when I added the figures in all those	12:55:34

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Transcript of Edward White
Conducted on February 2, 2022

25

1 invoices through the -- the last invoice was -- 12:55:37
2 that we have was March 6, 2017, I totaled that up 12:55:42
3 to about 1.295 million. Does that sound about 12:55:48
4 right for the amount of fees that your firm earned 12:55:52
5 performing services -- 12:55:57
6 MR. PRESIADO: Objection. 12:55:57
7 Q -- for Mr. Depp -- 12:55:58
8 MR. PRESIADO: Objection to the extent -- 12:55:59
9 objection to the extent it calls for speculation 12:56:05
10 and assumes facts not in evidence. 12:56:08
11 THE REPORTER: I didn't hear the end of 12:56:08
12 that question. 12:56:08
13 MR. PRESIADO: You can answer. 12:56:08
14 THE WITNESS: I do not recall the amount 12:56:09
15 of the fees, and I -- it's uncertain to me what 12:56:11
16 time period you're referencing. 12:56:14
17 MR. PRESIADO: Also, the documents speak 12:56:18
18 for themselves. 12:56:19
19 Q Would you have any reason to -- as you sit 12:56:23
20 here today, would you have any reason to doubt the 12:56:27
21 accuracy of the -- of what's listed on these 12:56:29
22 documents in terms of the total fees and costs 12:56:32

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Transcript of Edward White

Conducted on February 2, 2022

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1	charged to Mr. Depp?	12:56:34
2	A Subject to the qualifying comment I made	12:56:36
3	earlier, which is I cannot see the narrative, I'm	12:56:41
4	not sure I have all the statements in question;	12:56:44
5	however, it appears that the statements would	12:56:48
6	speak for themselves.	12:56:54
7	Q And the invoices that we see here are	12:56:59
8	dated March 31, 2016 through March 6, 2017. So	12:57:01
9	about a year. So my -- my question is: Would	12:57:09
FSPK 10	it -- would it surprise you if your firm earned	12:57:14
AF 11	over a million dollars from Mr. Depp during the	12:57:16
12	2016/2017 year?	12:57:20
13	MR. PRESIADO: Objection to the extent it	12:57:22
14	calls for speculation, assumes facts not in	12:57:23
15	evidence.	12:57:26
16	You can answer, if you understand the	12:57:26
17	question.	12:57:27
18	THE WITNESS: I understand the question.	12:57:28
19	And my response is no.	12:57:29
20	Q When did you start -- well, when did you	12:57:31
21	first meet Mr. Depp?	12:57:37
22	A I do not recall the exact date. But it	12:57:38

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Transcript of Edward White

Conducted on February 2, 2022

27

1 was in 2016. 12:57:42

2 Q Was that when you started working with him 12:57:43

3 as well? 12:57:51

4 A Almost immediately thereafter. 12:57:51

5 Q When were you -- how would you describe 12:57:59

VA 6 your relationship to Mr. Depp? Would you say 12:58:03

7 you're his accountant? 12:58:06

8 MR. PRESIADO: Objection; vague and 12:58:08

9 ambiguous. 12:58:10

10 You can answer, if you understand the 12:58:10

11 question. 12:58:11

12 THE WITNESS: I think it's more complex 12:58:13

13 than just being his accountant. 12:58:15

14 Q Business manager? 12:58:17

15 A Yes. 12:58:20

16 Q When were you first contacted about 12:58:21

17 working with Mr. Depp? 12:58:26

18 A It was in 2016. I do not recall the 12:58:27

19 specific date. 12:58:34

20 Q By whom were you contacted about working 12:58:36

21 with Mr. Depp? 12:58:38

22 MR. PRESIADO: Objection to the extent it 12:58:40

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Transcript of Edward White

Conducted on February 2, 2022

28

1 calls for attorney-client communications. 12:58:42

2 If you understand the objection, sir, and 12:58:45

3 to the extent an attorney was involved in those 12:58:47

4 communications, don't divulge the communication. 12:58:49

5 THE WITNESS: An attorney was not 12:58:54

6 involved. I was introduced to Mr. Depp by 12:58:55

7 executives at a bank in California. 12:58:57

8 BY MR. ROTTENBORN: 12:59:02

9 Q What bank? 12:59:02

10 A Bank of California. 12:59:03

11 Q I'm sorry. I misunderstood your answer. 12:59:06

12 Describe your initial meeting with 12:59:14

13 Mr. Depp. 12:59:21

14 MR. PRESIADO: Again, object to the extent 12:59:23

15 it calls for attorney-client communications. 12:59:24

16 If it doesn't, please answer. 12:59:26

17 THE WITNESS: It was pleasant, 12:59:29

18 informative. He was generally interested in his 12:59:34

19 pecuniary and tax matters, and it was an engaging 12:59:39

20 conversation. 12:59:44

21 Q Where was it? 12:59:45

22 A It was in his offices in Los Angeles, 12:59:46

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Transcript of Edward White
Conducted on February 2, 2022

29

1 California. 12:59:49

2 Q On Melrose? 12:59:51

3 A That's my recollection, but I don't recall 12:59:55

4 the specific address. 12:59:59

5 Q Now, you were brought in to replace TMG; 13:00:00

FSPK 6 is that right? 13:00:04

7 MR. PRESIADO: Objection to the extent it 13:00:06

8 calls for speculation, lacks foundation. 13:00:07

9 You can testify to your understanding. 13:00:11

10 THE WITNESS: What was the name of the 13:00:12

11 firm that you referenced? 13:00:13

12 Q TMG. 13:00:15

13 A TMG? The answer is yes. We became the 13:00:16

14 business managers for Mr. Depp and TMG was 13:00:22

15 disengaged. 13:00:26

16 MR. ROTTENBORN: Catherine, you can take 13:00:29

17 down that exhibit, by the way, please. Thank you. 13:00:31

18 Q Were you -- were you initially hired to 13:00:34

19 perform an audit of TMG's work in any way? 13:00:41

20 A "Audit" is a defined term within the 13:00:44

21 certified public accounting community, so the 13:00:51

22 answer would be no. We were engaged to address 13:00:53

CONFIDENTIAL - PURSUANT TO THE PROTECTIVE ORDER

Transcript of Edward White

Conducted on February 2, 2022

30

1 his financial circumstances and to construct a 13:00:57
2 turnaround business plan to resolve the issues 13:01:00
3 that he was confronting. 13:01:05

4 Q Was part of that work reviewing the work 13:01:06
5 that TMG had done and expressing opinion to 13:01:20
6 Mr. Depp on whether it had been done well or 13:01:24
7 correctly? 13:01:28

8 A Clearly, we were engaged to review all of 13:01:31
9 his historical financial information, perform an 13:01:36
10 analysis, and share with him our thoughts and 13:01:40
11 perspectives, and we undertook those services. 13:01:44

12 Q What was your understanding -- after you 13:01:47
13 did that review, what was your understanding of 13:01:54
14 Mr. Depp's financial status at the time when you 13:01:56
15 first became engaged? 13:01:59

16 MR. PRESIADO: Objection; vague and 13:02:02
17 ambiguous. 13:02:02

18 You can answer, if you understand it. 13:02:02

19 THE WITNESS: Could you repeat the 13:02:04
20 question, Counselor. 13:02:05

21 Q What was your understanding of Mr. Depp's 13:02:06
VA 22 financial status after you conducted your initial 13:02:08

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Transcript of Edward White

Conducted on February 2, 2022

31

1	review?	13:02:13
2	MR. PRESIADO: Objection; vague and	13:02:13
3	ambiguous.	13:02:14
4	You can answer, if you understand the	13:02:14
5	question.	13:02:15
6	THE WITNESS: Very challenging. His	13:02:15
7	short-term assets were less than his short-term	13:02:22
8	liabilities or obligations, and it confronted a	13:02:27
9	series of liquidity issues that had to be	13:02:31
10	addressed and managed.	13:02:34
11	Q And this was in early 2016?	13:02:35
12	A Yes.	13:02:41
13	Q Are you familiar with the allegation that	13:02:43
14	Mr. Depp made against TMG that they had failed to	13:02:57
15	file taxes for him for several years prior to	13:03:01
16	2016?	13:03:04
17	A Well, I do not recall the specific facts	13:03:05
18	because it's been years ago. In a general	13:03:09
19	response, I would say yes.	13:03:12
20	Q Did you make a determination about whether	13:03:14
21	or not they had -- TMG had failed to file taxes?	13:03:16
22	MR. PRESIADO: Objection.	13:03:19

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Transcript of Edward White

Conducted on February 2, 2022

32

1 To the extent that work was done in 13:03:21
2 connection with that litigation and it was done at 13:03:23
3 the behest of counsel, I would instruct you not to 13:03:27
4 answer. 13:03:30

5 THE WITNESS: I will follow the advice of 13:03:34
6 counsel -- my counsel. 13:03:35

7 BY MR. ROTTENBORN: 13:03:38

8 Q Do you have personal knowledge of whether 13:03:38
9 or not TMG failed to file taxes -- 13:03:43

10 MR. PRESIADO: Same objection. 13:03:46

11 Q -- for several years prior to 2016? 13:03:47

12 MR. PRESIADO: Same objection. 13:03:50

13 To the extent the answer to that question 13:03:51
14 results from work you did at the behest of 13:03:53
15 counsel, I would instruct you not to answer. 13:03:57

16 THE WITNESS: I will follow the advice of 13:04:00
17 my counsel. 13:04:01

18 Q You're still Mr. Depp's -- your firm still 13:04:28
19 provides services for Mr. Depp today, right? 13:04:32

20 A Yes. 13:04:34

21 Q How many times, roughly, would you say you 13:04:37
22 met face to face with Mr. Depp over the years? 13:04:40

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Transcript of Edward White

Conducted on February 2, 2022

33

1	A Numerous. I do not recall a specific	13:04:45
2	number of times.	13:04:47
3	Q When was the last time you saw him?	13:04:48
4	A I do not recall.	13:04:51
5	Q Has it been in the last year?	13:04:55
6	A I don't recall. I have to speak with my	13:04:56
7	assistant about what dates I may have met with	13:05:03
8	him. Mr. Depp travels internationally, and when	13:05:04
9	he's in Los Angeles we attempt to meet. And	13:05:11
10	hopefully that's responsive to your question.	13:05:15
11	Q Have you ever had difficulty getting in	13:05:17
12	touch with Mr. Depp?	13:05:19
13	A No.	13:05:20
14	Q Have you ever had difficulty getting	13:05:23
15	Mr. Depp to respond to your calls or texts or	13:05:25
16	e-mails?	13:05:28
17	A No.	13:05:29
18	Q To your knowledge, did Mr. Depp consume	13:05:30
19	alcohol when you first began representing him?	13:05:39
20	MR. PRESIADO: Objection; calls for	13:05:43
21	speculation, lacks foundation.	13:05:45
22	You can answer, if you have an	13:05:46

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Transcript of Edward White

Conducted on February 2, 2022

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1 understanding one way or the other. 13:05:48

2 THE WITNESS: Counsel, would you repeat 13:05:50

3 your question, please. 13:05:51

4 BY MR. ROTTENBORN: 13:05:52

FSPK⁵ Q To your knowledge, did Mr. Depp consume 13:05:52

R, P, VA 6 alcohol when you first began representing him? 13:05:54

7 MR. PRESIADO: Objection; vague and 13:05:56

8 ambiguous, calls for speculation, lacks 13:05:58

9 foundation. 13:06:02

10 You can answer, if you -- 13:06:03

11 THE WITNESS: Counselor, virtually 13:06:05

12 everyone I know consumes alcohol. 13:06:07

13 Q So is that a yes? 13:06:08

14 A Virtually everyone that I know consumes, 13:06:11

15 to some degree, alcohol. 13:06:15

16 Q Understood. And does that include 13:06:16

17 Mr. Depp? 13:06:20

18 A Can you restate your question. I'm not 13:06:20

19 certain what the nature and origin of your inquiry 13:06:24

20 is. 13:06:27

21 Q Yeah. And your job is just to answer my 13:06:28

22 questions, not -- my question to you is: Did 13:06:31

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Transcript of Edward White

Conducted on February 2, 2022

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FSPK,¹
R, P,²
VA

Mr. Depp consume alcohol when you first began

13:06:34

representing him?

13:06:36

3

MR. PRESIADO: And, Mr. Rottenborn, to the

13:06:37

4

extent he has a question about your question and

13:06:39

5

would like clarification, I think he's entitled to

13:06:41

6

ask.

13:06:44

7

Would you like that read back, Mr. White?

13:06:47

8

THE WITNESS: I think my answer would be:

13:06:50

9

Not excessively. But Mr. Depp would consume

13:06:51

10

possibly a glass of wine or other alcohol. And

13:06:56

11

hopefully that's responsive to your inquiry.

13:07:00

12

Q Have you ever observed -- it sounds like

13:07:03

13

from the answer that you just gave that the answer

13:07:07

14

is yes, but I'll ask you: Have you ever observed

13:07:10

R, P

15

Mr. Depp consuming alcohol?

13:07:13

16

A Yes.

13:07:16

17

Q Have you ever observed Mr. Depp doing any

13:07:17

18

illegal drugs?

13:07:22

19

A No.

13:07:24

20

Q Have you ever seen Mr. Depp appear to you

13:07:24

21

to be intoxicated?

13:07:31

22

A No.

13:07:32

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Transcript of Edward White

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36

1
FSPK,R
P, IO 2
VA

Q Do you know what Mr. Depp's -- during the 2016 forward time period, do you have any personal knowledge of whether Mr. Depp has an alcohol problem?

13:07:43
13:07:48
13:07:54
13:07:57

5 MR. PRESIADO: Objection; lacks foundation, calls for speculation.

13:07:59
13:08:00

7 THE WITNESS: No.

13:08:02

8
FSPK,R
P, 9
IO,
VA 10

Q Do you -- during the 2016 forward time period, do you have any personal knowledge of whether Mr. Depp has a drug problem?

13:08:04
13:08:06
13:08:08

11 A No.

13:08:10

12
FSPK,R
P, 13
IO,
VA 14

Q Do you have any personal knowledge of whether Mr. Depp has a drug or alcohol problem -- had a drug or alcohol problem prior to 2016?

13:08:13
13:08:16
13:08:20

15 MR. PRESIADO: Objection; lacks foundation, calls for speculation.

13:08:24
13:08:26

17 THE WITNESS: A direct response to your inquiry the answer is no. He has never in my presence appeared to be intoxicated with any substance.

13:08:27
13:08:33
13:08:37
13:08:40

21
H,R,P
22

Q Has he ever said anything to you about whether or not he has a drug or alcohol problem?

13:08:46
13:08:51

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CONFIDENTIAL - PURSUANT TO THE PROTECTIVE ORDER
Transcript of Edward White
Conducted on February 2, 2022

37

1	MR. PRESIADO: Objection to the extent it	13:08:53
2	calls for attorney-client communication.	13:08:55
3	You can answer.	13:08:57
4	THE WITNESS: No.	13:08:59
5	BY MR. ROTTENBORN:	13:08:59
6	Q Do you have any involvement in contracts	13:08:59
7	that Mr. Depp signs?	13:09:05
8	MR. PRESIADO: Objection; vague and	13:09:09
9	ambiguous as to involved.	13:09:09
10	MR. ROTTENBORN: Yeah. Let me ask it	13:09:12
11	differently.	13:09:14
12	Q Do you have any involvement in negotiating	13:09:14
13	contracts that Mr. Depp signs, or movies or	13:09:17
14	television or commercial opportunities?	13:09:19
15	A Yes.	13:09:23
16	Q What is that involvement? Just describe	13:09:23
17	the nature of it, please.	13:09:28
18	A The scope is broad in nature. I will give	13:09:31
19	you an example. If Mr. Depp is auditing a company	13:09:34
20	such as Disney, I and my colleagues would be	13:09:43
21	actively involved in providing services in	13:09:48
22	connection with that audit and the resolution of	13:09:50

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Transcript of Edward White

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1	any disputes relative to his rightful	13:09:54
2	entitlements.	13:09:58
3	Q Describe for me as a nonaccountant what	13:09:59
4	you mean by "auditing" in that answer.	13:10:04
5	A Reviewing historical records, reviewing	13:10:08
6	contracts, ascertaining the economic interest that	13:10:12
7	Mr. Depp would be entitled to, engage in	13:10:18
8	discussion with counsel and with representatives	13:10:21
9	from Disney, their perspectives, sharing with him	13:10:24
10	our perspective, and achieving a mutually	13:10:28
11	satisfactory result.	13:10:32
12	Q And are you primarily talking about your	13:10:33
13	involvement being after a contract is signed	13:10:35
14	figuring out what someone owes him?	13:10:38
15	A Primarily, yes.	13:10:40
16	Q Are you -- do you serve as a -- as an	13:10:43
17	agent for him in the sense of -- strike that.	13:10:48
18	Do you serve as a talent agent or booking	13:10:54
19	agent for him?	13:10:59
20	A No.	13:11:00
21	Q Who serves in that role for him right now?	13:11:00
22	A Jack Whigham.	13:11:06

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1 Q And prior to that it was Tracey Jacobs? 13:11:08
2 A Yes. 13:11:11
3 Q And you had communications with Tracey 13:11:11
4 Jacobs over the years about Mr. Depp, right? 13:11:16
5 A Yes. 13:11:20
6 Q When you -- I want to focus in on 2016, 13:11:21
7 when you first became involved with Mr. Depp. 13:11:37
8 What was some of the advice that you gave him 13:11:40
9 regarding how -- if and how he had to change his 13:11:44
10 spending habits? 13:11:47
11 A Reconstructed a turnaround business plan 13:11:51
12 which involved three salient issues: monetizing 13:11:55
13 assets, reducing expenditures, and attempting to 13:12:00
14 secure new engagements to drive revenue. 13:12:04
15 MR. PRESIADO: Before your next question I 13:12:08
16 just want to get this out of the way. I forgot to 13:12:10
17 do it at the outset. If this -- we request that 13:12:12
18 this entire transcript be marked as confidential 13:12:15
19 under the protective order. 13:12:18
20 You can ask your next question. Do you 13:12:24
21 have any objection to that, Mr. Rottenborn? 13:12:26
22 MR. ROTTENBORN: Not -- not -- I don't 13:12:28

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1 have the protective order in front of me, but 13:12:30
2 no -- certainly no objection to it being marked 13:12:33
3 fully confidential. I think there is a process in 13:12:34
4 place for it to be de-designated at some point in 13:12:37
5 time so that only the properly confidential 13:12:39
6 portions remain confidential. But for today's 13:12:41
7 purposes, no objection. 13:12:44
8 MR. PRESIADO: Understood. Thank you. 13:12:48
9 BY MR. ROTTENBORN: 13:12:50
10 Q So monetizing assets, is that -- what were 13:12:50
11 some of the ways that you proposed Mr. Depp 13:12:53
12 monetize assets? 13:12:58
13 A Selling assets that would reduce the cost 13:12:59
14 of maintaining such assets, create liquidity, 13:13:03
15 would be an example of what our goals and 13:13:08
16 objectives were. 13:13:10
17 Q Is one of the ways to do that to sell 13:13:11
18 properties that he owns? 13:13:19
19 A Yes. 13:13:27
20 Q Were you -- were you -- let me ask it this 13:13:27
21 way: In -- in Mr. Depp's lawsuit, are you 13:13:46
22 familiar that Mr. Depp was engaged in litigation 13:13:55

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1 with -- with TMG, or with The Mandel Company? 13:13:57

2 MR. PRESIADO: He's asking you if you're 13:14:08

3 aware that Mr. Depp was involved in a lawsuit 13:14:09

4 against TMG, or The Mandel Company. You can 13:14:12

5 answer. 13:14:20

6 THE WITNESS: Yes. 13:14:20

7 Q And are you -- are you aware that there 13:14:21

8 was a -- an allegation made in a cross-complaint 13:14:25

9 by the Mandels that Mr. Depp lived an ultra- 13:14:32

10 extravagant lifestyle that often knowingly cost 13:14:39

11 Depp in excess of \$2 million per month to 13:14:41

12 maintain? 13:14:44

13 MR. PRESIADO: I would object that it 13:14:44

14 calls for attorney-client communications and 13:14:46

15 instruct him not to answer. To the extent he was 13:14:47

16 involved in that litigation, it was at the behest 13:14:50

17 of counsel for Mr. Depp as a consultant. So I 13:14:52

18 would instruct him not to answer anything with 13:14:55

19 respect to what he learned or was told in 13:14:58

20 connection with that litigation. 13:15:01

21 Q Well, let me ask it this way -- and I'll 13:15:04

22 respect your counsel's objection, Mr. White. As I 13:15:09

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1	ask this next series of questions, what I'm asking	13:15:13
2	is: Outside of involvement in any litigation, if	13:15:16
3	you came to learn or understand some of these	13:15:19
4	facts alleged through the course of the work that	13:15:26
5	you provide or the services that you provide to	13:15:28
6	Mr. Depp.	13:15:30
7	So I guess my question is: Did -- before	13:15:31
8	you got involved, did Mr. Depp spend over	13:15:35
9	\$2 million a month on his lifestyle?	13:15:42
10	MR. PRESIADO: Objection. Same objection.	13:15:46
11	And, Mr. White, what I'm instructing you	13:15:50
12	not to divulge is anything you learned in	13:15:56
13	connection with your consultation with regard to	13:16:00
14	that litigation, the TMG/Mandel litigation. If	13:16:05
15	you learned something through that process, it's	13:16:09
16	privileged. If you can answer the question	13:16:11
17	separating that out, you can answer. Otherwise,	13:16:14
18	I'm instructing you not to answer.	13:16:17
19	THE WITNESS: I do not recall the exact	13:16:21
20	amount of the expenditures, but I know that	13:16:26
21	Ms. Heard and Mr. Depp had incurred substantial	13:16:29
22	expenditures and I was attempting to reconstruct	13:16:33

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1	his financial affairs in a thoughtful and prudent	13:16:36
2	manner.	13:16:41
3	BY MR. ROTTENBORN:	13:16:41
4	Q What -- what substantial expenditures did	13:16:41
5	Ms. Heard herself incur as opposed to Mr. Depp?	13:16:46
6	A I do not recall the exact amount, but they	13:16:50
7	included substantial expenditures for	13:16:52
8	entertainment, for travel, for the purchase of	13:16:57
9	wine, and for other items that were specifically	13:17:01
10	allocable to her.	13:17:06
11	Q How would you determine if items were	13:17:10
12	specifically allocable to her?	13:17:12
13	A I do not recall the specific information,	13:17:14
14	but it was clear to me and my colleagues that they	13:17:21
15	had undertaken a wide variety of activities	13:17:24
16	together to celebrate their union, and that she	13:17:26
17	was actively involved in consuming capital and	13:17:30
18	activating expenditures.	13:17:34
19	Q Did she buy any of the over dozen	13:17:36
20	properties that Mr. Depp owned?	13:17:41
21	MR. PRESIADO: Objection; vague and	13:17:45
22	ambiguous.	13:17:45

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1	BY MR. ROTTENBORN:	13:17:46
2	Q Did she -- did she buy those?	13:17:46
3	MR. PRESIADO: Vague and ambiguous and	13:17:50
4	incomprehensible. You're asking if she bought	13:17:52
5	properties owned by Mr. Depp. There's no --	13:17:56
6	there's no way to answer that question the way	13:17:59
7	it's posed.	13:18:01
8	If you understand the question, you can	13:18:03
9	answer. But, otherwise, you can ask for	13:18:04
10	clarification.	13:18:06
11	THE WITNESS: To the best of my knowledge,	13:18:07
12	what you're asking is, on the assets that Mr. Depp	13:18:08
13	sold, did Ms. Heard purchase those assets. Is	13:18:12
14	that correct?	13:18:16
15	Q I'm asking if Ms. Heard -- your -- you're	13:18:16
16	talking about Ms. Heard's -- let me ask it	13:18:21
17	differently. Mr. Depp was an extravagant	13:18:25
18	spender --	13:18:29
19	MR. PRESIADO: Was there a question?	13:18:33
20	Q -- correct?	13:18:34
21	MR. PRESIADO: I'm sorry? Can you pose	13:18:36
22	that as a question, please. It was a statement.	13:18:37

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1	MR. ROTTENBORN: Yeah, I was.	13:18:41
2	BY MR. ROTTENBORN:	13:18:41
3	Q Mr. Depp was an extravagant spender before	13:18:42
4	you got involved with him, right?	13:18:45
5	MR. PRESIADO: Objection to the extent it	13:18:47
6	calls for speculation, lacks foundation, vague and	13:18:48
7	ambiguous as to time.	13:18:50
8	THE WITNESS: I'd have to define the word	13:18:52
9	"extravagant." But the expenditures were in	13:18:55
10	excess of what we recommended. And, once again,	13:19:00
11	those expenditures were initiated and incurred by	13:19:03
12	Ms. Heard and Mr. Depp.	13:19:07
13	Q In all instances, was Ms. Heard involved	13:19:09
14	in initiating those expenditures?	13:19:11
15	MR. PRESIADO: Objection to the extent it	13:19:14
16	calls for speculation, lacks foundation.	13:19:15
17	THE WITNESS: I would assume no, not every	13:19:18
18	expenditure was Ms. Heard involved. But she had	13:19:24
19	an active involvement in their lifestyle and the	13:19:26
20	consumption of capital.	13:19:29
21	Q As did Mr. Depp, correct?	13:19:31
22	A Yes.	13:19:33

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1	Q Would you consider spending \$30,000 a	13:19:36
2	month on wine extravagant?	13:19:41
3	MR. PRESIADO: Objection; assumes facts	13:19:43
4	not in evidence.	13:19:47
5	THE WITNESS: I'm not certain that they	13:19:47
6	spent \$30,000 a month in wine, number one. And	13:19:48
7	number two, I know that Mr. Depp drinks very	13:19:52
8	little wine.	13:19:55
9	And with that, Counselor, I'd like to take	13:19:56
10	a break, if I may.	13:19:58
11	Q Sure. Let me just -- let's just -- let	13:20:01
12	me --	13:20:03
13	MR. PRESIADO: Ben, he's entitled to take	13:20:04
14	a break at any time as long as a question is not	13:20:07
15	pending. A question is not pending right now,	13:20:09
16	so we're going --	13:20:09
17	MR. ROTTENBORN: I understand.	13:20:12
18	MR. PRESIADO: We're going to take a	13:20:12
19	break.	13:20:14
20	MR. ROTTENBORN: Sure. That's fine.	13:20:14
21	THE VIDEOGRAPHER: Off the record at 1:20.	13:20:14
22	(Recess was held.)	13:20:14

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1	THE VIDEOGRAPHER: Back on the record at	13:36:15
2	1:36.	13:36:17
3	BY MR. ROTTENBORN:	13:36:18
4	Q Mr. White, did you -- did you become	13:36:18
5	familiar with Mr. Depp spending several million	13:36:27
6	dollars to build a cannon to blast Hunter S.	13:36:34
7	Thompson's ashes out over Colorado?	13:36:39
8	A No.	13:36:41
9	Q You don't have any personal knowledge	13:36:41
10	whether he did that one way or the other?	13:36:47
11	MR. PRESIADO: Objection; asked and	13:36:49
12	answered, calls for speculation, lacks foundation.	13:36:50
13	THE WITNESS: If that occurred, it	13:36:52
14	occurred prior to our engagement.	13:36:54
15	Q Right. And my question is: Do you -- do	13:36:57
16	you know that that occurred?	13:37:00
17	MR. PRESIADO: Objection; calls for	13:37:02
18	hearsay, lacks foundation, calls for speculation.	13:37:03
19	THE WITNESS: No.	13:37:05
20	Q Do you have personal knowledge about	13:37:08
21	Mr. Depp spending \$75 million on various	13:37:09
22	residences?	13:37:13

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1	A \$75 million on what, please?	13:37:14
2	Q Residences.	13:37:19
3	A I do not have at my disposal the amount of	13:37:23
4	his acquisition fees for residential property --	13:37:27
5	Q Do you have pers- --	13:37:32
6	A -- so I cannot corroborate the number that	13:37:33
7	you have represented, or made an inquiry about.	13:37:38
8	Q Do you have personal knowledge about	13:37:41
9	Mr. Depp spending millions of dollars on a yacht?	13:37:43
10	A No.	13:37:46
11	Q Would you say that Mr. Depp's financial	13:37:56
12	condition is better or worse than it was when you	13:37:58
13	first started working with him?	13:38:02
14	A Substantially improved. And the	13:38:04
15	residential properties he purchased appreciated in	13:38:10
16	value, and he enjoyed an economic betterment as a	13:38:13
17	result of the acquisitions.	13:38:17
18	Q Are you involved at all in discussions	13:38:20
19	with Mr. Depp about what commercial opportunities	13:38:33
20	he should take or pursue?	13:38:36
21	MR. PRESIADO: Again, to the extent an	13:38:41
22	attorney was involved in any such conversations, I	13:38:42

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1 would ask that you do not answer. Otherwise, you 13:38:44
2 can answer. 13:38:47
3 THE WITNESS: I may become aware of -- in 13:38:47
4 fact, we do become aware of engagements that he 13:38:53
5 decides to pursue. But the agent, let's say Jack 13:38:56
6 Whigham, would be the primary person who would 13:39:02
7 dialogue with Mr. Depp and formulate a decision as 13:39:05
8 to proceed or to dis- -- or not to proceed. 13:39:10
9 BY MR. ROTTENBORN: 13:39:13
10 Q And for commercial opportunities that 13:39:13
11 Mr. Depp either doesn't get or has lost, are you 13:39:16
12 involved or do you have personal -- personal 13:39:21
13 knowledge of the reasons why he doesn't get them 13:39:24
14 or would lose them? 13:39:26
15 MR. PRESIADO: Objection; vague and 13:39:28
16 ambiguous. 13:39:29
17 Also, if you have responsive testimony but 13:39:29
18 it was learned from attorneys, I would instruct 13:39:35
19 you not to answer. Otherwise, you can answer. 13:39:39
20 THE WITNESS: Yes, I do have personal 13:39:40
21 knowledge in response to your inquiry. 13:39:47
22 Q Okay. Describe the basis for that 13:39:48

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1	personal knowledge.	13:39:50
2	A I can't describe all the circumstances	13:39:50
3	that have transpired over the last several years.	13:39:55
4	But I'm aware of what happened most recently with	13:39:57
5	Disney and with Warner Bros. in connection with	13:40:02
6	his engagements.	13:40:06
7	Q Okay. Describe what you believe happened	13:40:07
8	recently with Disney.	13:40:10
9	A He was not reengaged for an addit--- for	13:40:13
10	the new film, for Pirates.	13:40:17
11	Q For Pirates 6?	13:40:20
12	A Yes.	13:40:23
13	Q Do you -- do you have any personal	13:40:23
14	knowledge of why he wasn't reengaged?	13:40:30
15	A Yes.	13:40:32
16	Q And what is that personal knowledge?	13:40:33
17	A That he wasnot engaged because of the	13:40:36
18	allegations that have been forthcoming from	13:40:41
19	Ms. Heard.	13:40:46
20	Q And where did you learn that personal	13:40:46
21	knowledge?	13:40:50
22	A I was informed by Mr. Depp's	13:40:50

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1	representatives, including Jack Whigham.	13:40:55
2	Q Who else informed you of that?	13:40:59
3	A I think that was the primary source. I	13:41:01
4	may have spoken with Mr. Depp about the issue.	13:41:07
5	But it was abundantly clear, not only to me, but	13:41:10
6	to the entire community that he was not part of	13:41:14
7	the Pirates 6 engagement, and that he was	13:41:19
8	disengaged from Fantastic Beasts 3. I think	13:41:21
9	that's public information.	13:41:26
10	Q And he was fired from Fantastic Beasts 3	13:41:28
11	after he lost the U.K. proceeding, right?	13:41:32
12	A I do not recall the timing of it, but I	13:41:34
13	know that he was disengaged.	13:41:38
14	Q And the reason that he was disengaged is	13:41:42
15	because he lost the U.K. proceeding that he chose	13:41:46
16	to bring in England, right?	13:41:49
17	MR. PRESIADO: Objection; assumes facts	13:41:51
18	not in evidence, calls for speculation, lacks	13:41:55
19	foundation.	13:41:55
20	You can answer if you understand the	13:41:58
21	question, and have personal knowledge.	13:42:00
22	THE WITNESS: I do not know the timing of	13:42:02

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1	or all the factors associated with the	13:42:07
2	disengagement, therefore, I cannot respond	13:42:09
3	affirmatively to the question you asked.	13:42:13
4	BY MR. ROTTENBORN:	13:42:15
5	Q And similarly, you don't know all the	13:42:15
6	factors associated with disengagement from Disney,	13:42:18
7	right?	13:42:22
8	A Correct. I'm not part of their internal	13:42:23
9	management team.	13:42:26
10	Q So you have no personal knowledge of why	13:42:26
11	Mr. Depp wasn't engaged for Pirates 6 any more so	13:42:29
12	than you don't have any personal knowledge of why	13:42:34
13	he was fired from Fantastic Beasts 3, correct?	13:42:36
14	MR. PRESIADO: Objection.	13:42:40
15	THE WITNESS: No, that's not correct.	13:42:40
16	Q Why is one different from the other?	13:42:41
17	A Because I was informed, as I shared with	13:42:44
18	you, what the facts were, and I generally believe	13:42:48
19	that he was a highly successful, very talented	13:42:50
20	performing artist, that those -- that Pirates 1	13:42:53
21	through 5 were hugely successful, and to disengage	13:42:57
22	him was something that surprised, I think, the	13:43:00

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1 entire community, including myself. 13:43:03

2 Q And it's your testimony today that the 13:43:05

3 sole reason he was disengaged from Disney for 13:43:07

4 Pirates 6 was because of allegations that 13:43:10

5 Ms. Heard made in her December 18, 2018 Washington 13:43:13

6 Post op-ed? 13:43:17

7 A I earlier stated, Counselor, that I'm not 13:43:19

8 part of the management team and I cannot opine on 13:43:22

9 all the factors that may be associated with the 13:43:25

10 disengagement. But he is, once again, an 13:43:28

11 internationally acclaimed, very successful artist 13:43:33

12 who has performed very successfully for Disney, 13:43:35

13 and it's a rational conclusion that the 13:43:39

14 disengagement is related to these allegations 13:43:41

15 Ms. Heard has made about spousal abuse. 13:43:44

16 Q Now, when we talk about allegations today, 13:43:47

17 Mr. White, if I refer to the term "op-ed," can we 13:43:52

18 agree that what I'm trying to do is to refer to 13:43:58

19 the December 18, 2018 op-ed that Ms. Heard 13:44:01

20 published in The Washington Post? Is that -- can 13:44:05

21 we agree on that parlance for today's deposition? 13:44:09

22 A Yes. 13:44:12

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1	Q Now, setting aside any disagreement over	13:44:13
2	what exactly Ms. Heard wrote or said in that	13:44:21
3	op-ed, do you understand that Mr. Depp's claims in	13:44:25
4	this lawsuit allege that Ms. Heard made defamatory	13:44:29
5	statements about him in that op-ed?	13:44:34
6	MR. PRESIADO: Objection to the extent	13:44:37
7	that calls for attorney-client communications.	13:44:38
8	You can answer if it will not divulge such	13:44:42
9	communication.	13:44:44
10	THE WITNESS: Based upon your comments,	13:44:45
11	Counselor, I will not respond to that inquiry.	13:44:52
12	Q And I don't want any of my questions to be	13:44:54
13	construed as an admission by me or Ms. Heard that	13:45:02
14	the op-ed had anything to do with Mr. Depp or was	13:45:07
15	about him or contained allegations against him.	13:45:10
16	But were the -- with that predicate, 2018 wasn't	13:45:15
17	the first time that Ms. Heard made allegations of	13:45:23
18	domestic abuse against Mr. Depp, correct?	13:45:27
19	A I do not recall the dates or times of her	13:45:29
20	allegations.	13:45:32
21	Q In fact, she -- she obtained a temporary	13:45:33
22	restraining order for domestic abuse against	13:45:36

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1 Mr. Depp in 2016, right? 13:45:40

2 MR. PRESIADO: Objection to the extent it 13:45:43

3 calls for speculation, lacks foundation. 13:45:44

4 Also, I would caution the witness to the 13:45:47

5 extent information was learned as a result of 13:45:50

6 conversations with counsel, that they not be 13:45:52

7 divulged. 13:45:55

8 THE WITNESS: Therefore, I cannot 13:45:56

9 respond -- will not respond to your inquiry, 13:45:57

10 Counselor. 13:45:59

AR 11 Q Other than conversations that you've had 13:46:00

12 with attorneys, you surely must have been aware in 13:46:04

13 2016 as you're working for Mr. Depp that Ms. Heard 13:46:08

14 had made allegations against him of domestic 13:46:10

15 abuse, right? 13:46:13

16 MR. PRESIADO: Objection; argumentative. 13:46:14

17 THE WITNESS: Any information I obtained 13:46:19

18 regarding the allegations would have been at 13:46:21

19 the -- from counsel, and I'm going to honor my 13:46:25

20 counsel's comment and not respond. 13:46:27

21 Q So you have no knowledge of whether or not 13:46:30

22 those allegations are true, right? 13:46:35

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Transcript of Edward White

Conducted on February 2, 2022

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1 MR. PRESIADO: Objection; misstates 13:46:39

2 testimony. And, again, based on his testimony to 13:46:40

3 date, I would instruct him not to answer. 13:46:44

4 THE WITNESS: And I will follow the advice 13:46:47

5 of my counsel. 13:46:49

6 BY MR. ROTTENBORN: 13:46:50

7 Q You don't have any personal knowledge 13:46:50

8 whether Mr. Depp beat, choked, ripped clumps of 13:46:52

9 hair from Ms. Heard, threatened to kill her, or 13:46:59

10 engaged in any other sort of domestic abuse, do 13:47:01

11 you? 13:47:01

12 MR. PRESIADO: And because he's asking for 13:47:06

13 your personal knowledge, that personal knowledge 13:47:08

14 cannot be something you heard from a third party, 13:47:11

15 including an attorney. So he's just asking about 13:47:12

16 your personal knowledge. You can answer in that 13:47:14

17 regard. 13:47:15

18 THE WITNESS: I have no personal knowledge 13:47:16

19 that Mr. Depp ever, in any form, abused Ms. Heard. 13:47:18

20 Q And you have no personal knowledge that he 13:47:24

IU, VA

21 didn't either, correct? 13:47:30

22 MR. PRESIADO: Objection; 13:47:33

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1 incomprehensible, vague and ambiguous, asking to 13:47:34
2 prove a negative. 13:47:43

3 You can answer, if you understand the 13:47:44
4 question. 13:47:45

5 THE WITNESS: I'll restate what I said 13:47:48

6 earlier: I have no knowledge that Mr. Depp ever 13:47:49

7 abused Ms. Heard in any form. 13:47:54

8 BY MR. ROTTENBORN: 13:47:56

IU,VA⁹ Q And you have no knowledge that Mr. Depp 13:47:56
AA

10 ever did not abuse Ms. Heard in any form, correct? 13:48:00

11 MR. PRESIADO: Objection; asked and 13:48:04

12 answered. 13:48:05

13 THE WITNESS: Counselor, I believe I've 13:48:09

14 answered your question to the best of my ability, 13:48:11

15 and once -- 13:48:13

16 Q You don't know -- you have no personal 13:48:15
AA

17 knowledge one way or the other whether Ms. Heard's 13:48:16

18 allegations of domestic violence against Johnny 13:48:18

19 Depp are true or false, correct? 13:48:23

20 MR. PRESIADO: Objection; asked and 13:48:24

21 answered. Harassment at this point. 13:48:25

22 THE WITNESS: Once again, Counselor, I 13:48:29

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Transcript of Edward White

Conducted on February 2, 2022

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1 have no knowledge that Mr. Depp ever abused 13:48:35

2 Ms. Heard in any form. 13:48:39

3 BY MR. ROTTENBORN: 13:48:40

IU, VA 4 Q And you have no knowledge that Mr. Depp -- 13:48:40

AA 5 you have no knowledge that Ms. Heard's allegations 13:49:24

6 of domestic abuse against Mr. Depp are true or 13:49:26

7 false. Is that fair? 13:49:29

8 MR. PRESIADO: Objection; asked and 13:49:31

9 answered. 13:49:31

10 Q Because if you do have personal knowledge 13:49:33

11 one way or the other, part of the deposition today 13:49:35

12 is finding the basis for that personal knowledge. 13:49:37

13 So that's -- that's -- I understand that you want 13:49:39

14 to only say things that are favorable to Mr. Depp, 13:49:43

15 Mr. White, but if you have personal knowledge one 13:49:46

16 way or the other about whether domestic abuse 13:49:48

17 occurred, I'm entitled to that personal knowledge 13:49:52

18 today. So with that, I'll ask my question again. 13:49:54

AA 19 Do you have any personal knowledge one way 13:49:57

20 or the other of whether or not Mr. Depp abused 13:49:59

21 Ms. Heard? 13:50:01

22 MR. PRESIADO: I object to the prelude to 13:50:04

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Transcript of Edward White

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O 1 the question and the statements made by counsel 13:50:06
2 leading up to the question. And with respect to 13:50:07
3 the question, it's been asked and answered. 13:50:09

4 THE WITNESS: Counselor, my intent is not 13:50:14
5 to merely make statements that are favorable to 13:50:16
6 Mr. Depp. My intent is to be honest with you, and 13:50:19
7 I believe I've been just that. 13:50:21

8 BY MR. ROTTENBORN: 13:50:23

9 Q And you don't know whether or not abuse 13:50:23
AA 10 occurred -- 13:50:26

11 MR. PRESIADO: Objection. 13:50:28

12 Q -- right? 13:50:28

13 MR. PRESIADO: Objection; argumentative, 13:50:30
14 asked and answered. 13:50:32

15 THE WITNESS: Counselor, once again -- and 13:50:38
16 hopefully this will be the final time -- I have no 13:50:40
17 knowledge that Mr. Depp has ever abused Ms. Heard 13:50:42
18 in any form. 13:50:45

19 Q Understood. But you also have no 13:50:46
AA 20 knowledge that Ms. Heard's allegations of abuse 13:50:49
21 against Mr. Depp are false, do you? 13:50:52

22 MR. PRESIADO: Same objections. At this 13:50:55

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Transcript of Edward White

Conducted on February 2, 2022

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1	point, Ben, you may not like his answer, but	13:50:57
2	that's his answer, and he's answered the same	13:51:00
3	question maybe a half a dozen times. So we need	13:51:03
4	to move on or else this gets to the point of	13:51:08
5	harassing -- harassment and abuse.	13:51:10
6	BY MR. ROTTENBORN:	13:51:12
7	Q You can answer.	13:51:12
8	A Counselor, with all due respect, I believe	13:51:18
9	I have answered, and I'd appreciate it if you	13:51:20
10	would go on with your additional inquiries.	13:51:23
11	Q Well, the record will be clear that you	13:51:25
12	haven't, but we'll move on.	13:51:29
13	What personal knowledge -- well, actually,	13:51:38
14	let's do it this way:	13:51:41
15	MR. ROTTENBORN: Let's pull up the	13:51:42
16	document entitled EWC1 through 52, please.	13:51:44
17	AV TECHNICIAN: Please stand by.	13:51:52
18	(Exhibit 2, Financial statements, Bates	13:51:52
19	Nos. EWC000001 through EWC000052, was marked for	13:51:52
20	identification and is attached to the transcript.)	13:52:16
21	AV TECHNICIAN: Exhibit 2.	13:52:16
22	Q Mr. White, do you see -- we call it Bates	13:52:17

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1 numbers. They're at the bottom of the page. It's 13:52:32
2 listed EWC several zeros and a 1. 13:52:33
3 A Yes. 13:52:37
4 Q Did you produce these documents that have 13:52:38
5 the "EWC" label? 13:52:43
6 A It appears that I did. Our firm did, yes. 13:52:44
7 MR. PRESIADO: With the caveat that all 13:52:52
8 he -- all that's on the screen is one page, EWC 1. 13:52:55
9 MR. ROTTENBORN: Yeah. 13:52:59
10 MR. PRESIADO: Would you like him to 13:53:00
11 scroll through all these to -- and then answer 13:53:03
12 your question? 13:53:05
13 Q I'll direct you to where my questions are 13:53:07
14 gonna -- gonna flow from, Mr. White. If, at any 13:53:08
15 point, you want to see any other pages of this 13:53:11
16 document, you just let us know and you certainly 13:53:13
17 have the right to do that. 13:53:15
18 MR. PRESIADO: That works. 13:53:16
19 Q Now, these documents are Income Statements 13:53:24
20 for Mr. Depp's -- and other financial statements 13:53:28
21 for entities related to Mr. Depp, correct? If you 13:53:36
22 need to scroll through them -- why don't we do 13:53:41

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Transcript of Edward White

Conducted on February 2, 2022

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1	this --	13:53:44
2	A From what I've seen, the answer to your	13:53:44
3	question is yes.	13:53:47
4	Q And what is EWC 1?	13:53:48
5	A EWC 1?	13:53:53
6	Q The page that's in front of you.	13:53:57
7	A What it -- what is this statement, is that	13:53:59
8	what you're saying?	13:54:02
9	Q Yes, sir.	13:54:03
10	A It's a statement of income for Infinitum	13:54:03
11	for the 12 months ended December 31, 2009.	13:54:08
12	Q And if you -- you can go ahead and kind of	13:54:14
13	slowly scroll down. If you go through that --	13:54:24
14	MR. PRESIADO: He's not able to do that,	13:54:28
15	Ben, but can you --	13:54:30
16	AV TECHNICIAN: Ms. Vasquez, you have	13:54:31
17	control.	13:54:33
18	MR. PRESIADO: Thank you.	13:54:34
19	THE WITNESS: Go ahead, please.	13:54:52
20	Q Do these also include Profit & Loss	13:54:52
21	statements for Infinitum?	13:54:55
22	A Yes; it's an income- and expense-related	13:55:02

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Transcript of Edward White

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1 analysis. 13:55:04

2 Q And if you keep scrolling through -- well, 13:55:05

3 let me ask this: What is Infinitum? 13:55:14

4 A It's an entity owned by Mr. Depp that, in 13:55:17

5 effect, is a production company. 13:55:21

6 Q What is L.R.D. Productions? 13:55:26

7 A It's also an entity owned by Mr. Depp that 13:55:30

8 involves in -- that's utilized as a loan-out 13:55:34

9 corporation for his activities. 13:55:39

10 Q What is a loan-out corporation? 13:55:41

11 A Loan-out corporation is an entity that's 13:55:43

12 typically owned by an individual in the 13:55:47

13 entertainment industry, and they conduit their 13:55:49

14 business activities through this entity rather 13:55:53

15 than directly to themselves. 13:55:56

16 Q What is -- and would you agree that EWC 13 13:55:57

17 through 23 are Income Statements and some Profit & 13:56:08

18 Loss statements for L.R.D. Productions? 13:56:23

19 A They appear to be just that. 13:56:25

20 Q Can you go turn to EWC 20, please. 13:56:28

21 A Okay. So this is -- if we are looking at 13:56:38

22 the same document, this is L.R.D. Productions, 13:56:54

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Transcript of Edward White

Conducted on February 2, 2022

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1	Inc., Profit & Loss January through December 2016.	13:56:57
2	Q Uh-hum. Yup.	13:57:02
3	And then EWC 21 is L.R.D. Productions	13:57:04
4	Profit & Loss January through December 2018. Do	13:57:12
5	you see that?	13:57:15
6	A Yes.	13:57:15
7	Q Do you -- would you have a Profit & Loss	13:57:16
8	statement for L.R.D. Productions for 2017?	13:57:25
9	Because I'll represent to you that we do not have	13:57:29
10	that.	13:57:31
11	A I would have to consult with my	13:57:31
12	colleagues, but we may well have a 2017.	13:57:33
13	Q Were you involved in compiling these	13:57:37
14	documents?	13:57:41
15	A Could you restate the question, please.	13:57:41
16	Q Were you involved in compiling these	13:57:45
17	documents?	13:57:47
18	A My colleagues compiled them. I provide	13:57:48
19	supervision, respond to inquiries, but I have a	13:57:52
20	staff of people that would actually do the	13:57:56
21	compilation.	13:57:58
22	Q Okay. And would you agree that the	13:57:58

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Transcript of Edward White
Conducted on February 2, 2022

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1	documents numbered EWC 24 through 46 are Income	13:58:12
2	Statements and Profit & Loss statements for	13:58:24
3	Scaramanga Bros.?	13:58:27
4	A They appear to be Income Statements for	13:58:31
5	Scaramanga, if that's responsive to your question.	13:58:35
6	Q And Profit & Loss statements as well?	13:58:37
7	A It's -- just let me look at it for a	13:58:41
8	moment.	13:58:50
9	Q Sure.	13:58:51
10	A What I'm looking at -- it moved. What I'm	13:58:51
11	looking at is a Profit & Loss summary analysis for	13:58:54
12	January through December 2016. Is that responsive	13:59:00
13	to your question?	13:59:04
14	Q Yeah. My question was just if -- if these	13:59:05
15	documents included -- you said just Income	13:59:10
16	Statements, but also Profit & Loss statements for	13:59:13
17	Scaramanga Bros.	13:59:16
18	A There are three entities, you've	13:59:17
19	identified them, that are only owned by Mr. Depp	13:59:19
20	and utilized for his business activities.	13:59:22
21	Q What is Scaramanga Bros.?	13:59:26
22	A It's another loan-out corporation. And	13:59:29

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Transcript of Edward White
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1	depending upon the nature and the scope of the	13:59:34
2	business activity, the income and related expenses	13:59:36
3	are a conduit through this entity, as they are for	13:59:40
4	L.R.D., and as they are for Infinitum.	13:59:44
5	Q And is your firm responsible for filing	13:59:48
6	Mr. Depp's individual tax returns and tax returns	13:59:51
7	for these entities?	13:59:54
8	A Yes.	13:59:56
9	Q And have you been since you were retained	13:59:57
10	in 2016?	14:00:03
11	A Yes.	14:00:03
12	MR. ROTTENBORN: Can you please go to the	14:00:06
13	table starting at EWC 48.	14:00:07
14	Q And just tell me, what are these	14:00:22
15	documents?	14:00:24
16	A It appears that this document was	14:00:24
17	constructed to identify sources of revenue from	14:00:36
18	various business relationships for several periods	14:00:42
19	commencing in 2009. Based upon what I can see on	14:00:48
20	the screen, continuing through --	14:00:53
21	MR. ROTTENBORN: Not so small. I can't	14:00:56
22	see it.	14:00:58

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Transcript of Edward White

Conducted on February 2, 2022

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1	THE WITNESS: See, what's happened is, on	14:01:00
2	the right side of my screen there is a visual	14:01:01
3	image of all the people participating.	14:01:05
4	I'm just trying to get the final date.	14:01:07
5	It's a little small. Can we make that a little	14:01:10
6	bigger, please.	14:01:12
7	Is that 2020? Yes, it appears that the	14:01:14
8	schedule commences on 2009 and continues through	14:01:19
9	August of 2020.	14:01:24
10	BY MR. ROTTENBORN:	14:01:26
11	Q And is this a schedule that you put	14:01:26
12	together?	14:01:31
13	A This would have been put together by my	14:01:31
14	colleagues. I would have engaged in discussions	14:01:33
15	with them about the content.	14:01:38
16	Q For all these documents, EWC 1 through 52,	14:01:43
17	what other documents did you or anyone else rely	14:01:50
18	upon or refer to to prepare them?	14:01:56
19	A We would have looked at the underlying	14:01:58
20	source documents; for example, contracts. We	14:02:03
21	would have looked at the stream of payments that	14:02:08
22	were actually rendered. That would be examples of	14:02:11

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Transcript of Edward White
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1	the kind of information that we would have	14:02:13
2	analyzed in order to produce this document.	14:02:15
3	Q What else would you have analyzed?	14:02:19
4	A. Those are the two salient elements; what	14:02:21
5	the contract stipulates and what actually was	14:02:25
6	received.	14:02:28
7	Q And were there also -- for -- and I'm	14:02:29
8	talking about not only this summary document on 48	14:02:35
9	to 52, but also EWC 1 through 47, which shows --	14:02:38
10	those documents show expenses as well, right?	14:02:44
11	A What I looked at earlier there were	14:02:47
12	schedules that showed profit and loss and,	14:02:52
13	therefore, the loss portion of it would be the	14:02:54
14	expense part of the ledger.	14:02:56
15	Q So, what documents would you or anyone	14:02:58
16	else refer or rely upon to generate the Income	14:03:01
17	Statements or Profit & Loss statements?	14:03:05
18	A Numerous documents. There could be	14:03:07
19	thousands if not tens of thousands of entries that	14:03:12
20	would be compiled and organized and presented to	14:03:16
21	construct these numbers.	14:03:20
22	Q And where would those entries or that	14:03:21

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Transcript of Edward White

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1	information reside?	14:03:25
2	A They reside in journals, which is the book	14:03:25
3	of first entry, and in the ledgers that are	14:03:30
4	maintained for each of these entities.	14:03:35
5	Q Do you use software for those journals or	14:03:37
6	ledgers?	14:03:43
7	A Yes, we do.	14:03:44
8	Q What software?	14:03:45
9	A A company called QuickBooks. On some	14:03:46
10	cases we've used Datafaction.	14:03:50
11	Q I'm sorry, what was that second one?	14:03:53
12	A Datafaction.	14:03:55
13	But QuickBooks is our primary software	14:04:06
14	package, if you will.	14:04:11
15	Q You mentioned earlier, I think when you	14:04:12
16	were referring to the summary tables at the end of	14:04:14
17	this document bundle, that you would look at	14:04:16
18	contracts and stream of payments. What is "stream	14:04:19
19	of payments"?	14:04:23
20	A That's the actual receipts of cash that is	14:04:24
21	paid to Mr. Depp and his entities from the various	14:04:31
22	companies that engage him.	14:04:36

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Transcript of Edward White
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1	Q And where does that information exist?	14:04:42
2	A It exists in the journals and in the	14:04:43
3	ledgers for each of the entities.	14:04:46
4	Q Have you produced those contracts, the	14:04:48
5	stream of payments, the journals, the ledgers,	14:04:57
6	anything of that nature in this case?	14:05:00
7	MR. PRESIADO: Objection; compound.	14:05:03
8	You can answer, if you know.	14:05:08
9	THE WITNESS: Well, all the information	14:05:09
10	that we were requested has been produced and sent	14:05:11
11	to counsel.	14:05:15
12	Q And I don't want to know what your counsel	14:05:17
13	told you to produce or not because that's	14:05:20
14	privileged at this point, but my question to you	14:05:23
15	is: Do you know whether or not you have	14:05:25
16	produced -- like you produced EWC 1 through 52 to	14:05:28
17	us, whether you produced contracts or stream of	14:05:33
18	payments or journals or ledgers or any other	14:05:37
19	information that would underlie EWC 1 through 52?	14:05:40
20	MR. PRESIADO: And I object to that as	14:05:46
21	privileged. What he produced to counsel is	14:05:48
22	privileged, so I'd instruct him not to answer.	14:05:52

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Transcript of Edward White
Conducted on February 2, 2022

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1	You can ask him, as you have been, what exists.	14:05:58
2	But as far as what he produced at the instruction	14:06:01
3	of counsel is privileged.	14:06:04
4	THE WITNESS: Therefore, I will follow the	14:06:08
5	advice of my counsel.	14:06:10
6	BY MR. ROTTENBORN:	14:06:15
7	Q And my question was: Is he aware -- are	14:06:15
8	you aware, Mr. White, of any of that type of	14:06:18
9	information being produced to Ms. Heard's side in	14:06:21
10	this case?	14:06:26
11	MR. PRESIADO: Objection. That would	14:06:28
12	necessarily involve attorney-client	14:06:30
13	communications. I instruct him not to answer.	14:06:33
14	THE WITNESS: Therefore, I will not answer	14:06:34
15	in accordance with the instruction of my counsel.	14:06:36
16	Q Mr. White, are you aware of a court order	14:06:38
17	requiring Mr. Depp to produce all underlying	14:06:45
18	financial documents relied upon or referred to by	14:06:49
19	you, Mr. White, to prepare the numbers and	14:06:53
20	calculations included in EWC 1 through 52?	14:06:56
21	MR. PRESIADO: Objection; calls for --	14:07:01
22	necessarily calls for attorney-client	14:07:02

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Transcript of Edward White

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1	communications and I'd instruct him not to answer.	14:07:04
2	THE WITNESS: Therefore, I will not answer	14:07:07
3	in accordance with the instruction from my	14:07:09
4	counsel.	14:07:12
5	BY MR. ROTTENBORN:	14:07:12
6	Q I disagree that that necessarily entails	14:07:14
7	that, but we'll obviously take direction from your	14:07:15
8	counsel.	14:07:19
9	Have you ever taken it upon yourself,	14:07:28
10	Mr. White, to see a public order requiring	14:07:30
11	Mr. Depp to produce the information that I just	14:07:35
12	listed?	14:07:37
13	MR. PRESIADO: I'm sorry, Ben, I -- I must	14:07:38
14	have missed the beginning of that. Can you repeat	14:07:40
15	that, please.	14:07:43
16	Q Other than communications with your	14:07:44
17	counsel, have you ever seen yourself, taken it	14:07:45
18	upon yourself to see a public court order	14:07:48
19	requiring Mr. Depp to produce documents referred	14:07:52
20	to or relied upon in constructing EWC 1 through	14:07:55
21	52?	14:08:00
22	MR. PRESIADO: I'm not sure I understand	14:08:01

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Transcript of Edward White

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1 that question, so I'll object as vague and 14:08:02

2 ambiguous. 14:08:06

3 But, again, to the extent -- to the extent 14:08:06

4 you understand the question, to the extent you can 14:08:07

5 answer without divulging attorney-client 14:08:10

6 communications, you can do so. Otherwise, I would 14:08:12

7 instruct you not to answer. 14:08:14

8 THE WITNESS: I do not believe I can 14:08:16

9 respond to that without violating the attorney- 14:08:17

10 client privilege, and, therefore, I will follow 14:08:21

11 the advice of my counsel. 14:08:24

12 BY MR. ROTTENBORN: 14:08:25

13 Q I just want to kind of get a breakdown 14:08:25

14 of -- or just kind of get an understanding of 14:08:36

15 these documents to some degree. So if we look at, 14:08:38

16 like we looked at before, just say EWC 20, just as 14:08:50

17 an example. 14:08:54

18 Just to make sure I'm understanding these 14:08:55

19 documents, this document is saying that in the 14:09:19

20 calendar year 2016, L.R.D. Productions had a gross 14:09:25

21 profit of 2.098 million and change? 14:09:31

22 A That's what the schedule states. 14:09:36

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1	MR. ROTTENBORN: Let's go to -- just by	14:09:53
2	way of example, let's go to EWC 35, please.	14:10:14
3	BY MR. ROTTENBORN:	14:10:34
4	Q Can you -- and I think I have an	14:10:34
5	understanding, but I'm curious as to yours. Can	14:10:36
6	you explain to me what a residual is.	14:10:39
7	A Yes. Artists receive upfront	14:10:41
8	consideration for their performances. In	14:10:48
9	addition, if you are highly acclaimed, you have a	14:10:51
10	participation in the film based upon a formula.	14:10:53
11	And the residuals would be the quantification of	14:10:57
12	your participation. So it comes after the movie	14:11:03
13	is produced and viewed by the general public, and	14:11:11
14	typically been very successful, that produces	14:11:15
15	extraordinary income, and the artist may	14:11:18
16	participate in that, and that creates a residual.	14:11:22
17	Q How does that differ from profit	14:11:25
18	participation?	14:11:28
19	A It's a term of -- that some people use.	14:11:30
20	And it may be some -- substantially equivalent.	14:11:33
21	Q So, like, on EWC 35, in 2015, Scaramanga	14:11:37
22	Bros., as a result, I assume, with Mr. Depp's	14:11:46

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1	involvement in these films, but tell me if I'm	14:11:49
2	wrong, received a number of residuals in a number	14:11:51
3	of films and television appearances, right?	14:11:54
4	MR. PRESIADO: Objection; compound.	14:11:57
5	THE WITNESS: The answer is yes, the	14:11:58
6	schedule depicts the sources of that revenue.	14:12:02
7	Q And if you go to the next page, EWC 36,	14:12:05
8	there's a separate section for Profit	14:12:08
9	Participation. Do you see that?	14:12:14
10	A Yes.	14:12:15
11	Q What is the difference between profit	14:12:18
12	participation and residuals --	14:12:23
13	A It's oftentimes how the entertainment	14:12:27
14	company classifies their disbursements. But both	14:12:29
15	a residual and a profit participation is something	14:12:33
16	earned by the artist in addition to their initial	14:12:36
17	guaranteed compensation.	14:12:41
18	Q Do you have -- obviously, this -- the	14:12:54
19	information that you have at your firm's disposal	14:12:58
20	for -- before you became involved, that	14:13:01
21	information had to come from somewhere, right?	14:13:04
22	MR. PRESIADO: I'm sorry, Ben. I missed	14:13:07

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1 that question. Can you repeat it, please. 14:13:08

2 MR. ROTTENBORN: Sure. Let me rephrase. 14:13:10

3 BY MR. ROTTENBORN: 14:13:10

4 Q Did -- does -- the information about what 14:13:13

5 Mr. Depp or his affiliated companies earned before 14:13:15

6 you were hired, did that come from TMG records? 14:13:19

7 MR. PRESIADO: Again, to the extent 14:13:28

8 that -- to the extent your knowledge in that 14:13:30

9 regard was obtained through communications where 14:13:32

10 attorneys were present, I would instruct you not 14:13:35

11 to answer. But, otherwise, you can answer. 14:13:37

12 THE WITNESS: Attorneys were not present. 14:13:40

13 And we obtained all the historical documents that 14:13:42

14 had been constructed by TMG, and that would have 14:13:45

15 been the source of our information. 14:13:47

16 Q Do you have any knowledge one way or the 14:13:56

17 other on whether those records that you received 14:13:58

18 from TMG are accurate? 14:13:59

19 A I do not have any reason to believe 14:14:01

20 they're not accurate. But we did not reconstruct 14:14:08

21 the historical information and perform a 14:14:12

22 comprehensive forensic study. 14:14:15

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1 Q Weren't you -- as part of your initial 14:14:20
2 review of TMG's work, weren't you fairly critical 14:14:23
3 of the work that TMG had performed? 14:14:27

4 MR. PRESIADO: Again, his involvement in 14:14:32
5 that litigation was in a consultant capacity in 14:14:34
6 connection with the litigation, so his answer 14:14:37
7 necessarily would be a disclosure of attorney- 14:14:40
8 client communication -- 14:14:43

9 MR. ROTTENBORN: No, I -- 14:14:44

10 MR. PRESIADO: -- or work product -- or 14:14:44
11 work product, and I would instruct him not to 14:14:46
12 answer. 14:14:49

13 However, if he can answer that separate 14:14:50
14 and apart from his involvement in that litigation, 14:14:53
15 in other words, in his capacity as a CPA, 14:14:57
16 et cetera, I would allow him to answer. 14:15:02

17 MR. ROTTENBORN: Yeah. And we don't need 14:15:06
18 attorneys arguing with each other, but I -- just 14:15:08
19 to clarify, he's testified that he took over from 14:15:10
20 TMG and was hired to conduct a review, so that 14:15:12
21 would -- again -- 14:15:15

22 MR. PRESIADO: I just want to make it 14:15:17

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1 clear that any analysis in connection with the TMG 14:15:20
2 litigation, I would instruct him not to divulge. 14:15:23
3 Otherwise, he can answer the question. 14:15:25
4 THE WITNESS: Counselor, it would be very 14:15:27
5 difficult for me to discriminate between 14:15:28
6 information that was produced by counsel during 14:15:32
7 the litigation and that which I may have 14:15:34
8 discovered otherwise. Therefore, I'm going to 14:15:37
9 follow the advice of my counsel and not respond to 14:15:40
10 that inquiry. 14:15:44
11 BY MR. ROTTENBORN: 14:15:49
12 Q So sitting here today, you have no 14:15:49
13 nonprivileged personal knowledge of whether or not 14:15:55
14 the numbers that you received from TMG for years 14:15:58
15 before your firm was hired are accurate? 14:16:01
16 MR. PRESIADO: Objection; misstates 14:16:05
17 testimony, vague and ambiguous, assumes facts not 14:16:06
18 in evidence, and compound. 14:16:17
19 And just so we're all on the same page, 14:16:22
20 including the witness, something learned -- when 14:16:24
21 something is originally learned in the context of 14:16:28
22 attorney-client communication or work product in 14:16:31

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1 the case of consultation for attorneys for a 14:16:33
2 client, it doesn't become -- the privilege isn't 14:16:36
3 lost if that knowledge is transferred into a 14:16:40
4 separate act. 14:16:45

5 With that thought, an explanation -- with 14:16:48
6 that explanation, Mr. White, you can determine 14:16:51
7 whether or not you can answer without divulging 14:16:56
8 attorney-client communications. 14:16:59

9 MR. ROTTENBORN: Yeah, and I don't want 14:17:01
10 this to get contentious, Leo. I disagree with 14:17:03
11 your analysis of attorney-client privilege, but 14:17:06
12 I'm not gonna -- you know, the witness can decide 14:17:08
13 whether to listen to your advice or not, and I'm 14:17:11
14 not going to try to undermine that while reserving 14:17:14
15 all rights today. 14:17:17

16 But to the extent that he has 14:17:18
17 nonprivileged personal knowledge about the 14:17:19
18 questions I'm asking him, I'm entitled to get 14:17:20
19 that. 14:17:24

20 MR. PRESIADO: If you pose the question as 14:17:25
21 in the context of him performing his CPA and 14:17:27
22 management duties, then he can answer it in that 14:17:35

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1 context. But you're couching it in terms of the 14:17:40
2 TMI [sic] litigation. So if you couch it in the 14:17:44
3 terms of what he's done in his capacity as 14:17:47
4 CPA/business manager for Mr. Depp, he can likely 14:17:52
5 answer the question. 14:17:54

6 MR. ROTTENBORN: Yeah. And I, again, 14:17:56
7 would disagree with that. 14:17:58

8 BY MR. ROTTENBORN: 14:17:58

9 Q But let's -- let's try it this way, 14:18:00

10 Mr. White: In the context of the professional 14:18:03

11 services that you provide as a business manager 14:18:06

12 for Mr. Depp, do you have any opinion one way or 14:18:09

13 the other on whether or not the numbers that you 14:18:11

14 got from TMG are accurate? 14:18:13

15 A Counselor, with all due respect, it's 14:18:21

16 difficult for me to separate the two issues and be 14:18:23

17 confident that I'm complying with the 14:18:30

18 confidentiality agreement and the attorney-client 14:18:31

19 privilege requirement. Therefore, I'm not going 14:18:34

20 to respond to that and circumvent the potential 14:18:37

21 that I have somehow compromised my professional 14:18:42

22 responsibilities. 14:18:45

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1 Q Why do -- why do -- does so much more of 14:18:46
2 the revenue appear to flow through Scaramanga 14:18:53
3 Bros. than L.R.D. if they're both loan-out 14:18:56
4 companies? 14:19:00

5 A Because the -- Scaramanga is the primary 14:19:00
6 entity that is utilized for substantial 14:19:02
7 engagements. L.R.D. can be more foreign based. 14:19:06
8 As I mentioned to you, Infinitem is more of a 14:19:10
9 production company. So it's just the use of the 14:19:14
10 entities to serve as his business objectives. 14:19:16

11 Q What is the business objective for L.R.D. 14:19:21
12 versus the business objective for Scaramanga? And 14:19:25
13 I understand that that's compound, so I'm going 14:19:28
14 to -- but I'm trying to figure out why some 14:19:30
15 payments would go to Scaramanga and some would go 14:19:32
16 to L.R.D. 14:19:35

17 So with that, I'll ask you: What's -- how 14:19:35
18 do you determine whether a business payment should 14:19:38
19 be made to L.R.D. or to Scaramanga? 14:19:40

20 A The nature and the scope of the 14:19:43
21 engagement, and whether it's domestic or foreign, 14:19:46
22 and the party which has engaged that entity, and, 14:19:49

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1 therefore, Mr. Depp's services. And it's also 14:19:55
2 based upon historical relationships with these 14:20:00
3 entities. 14:20:03

4 Q Are you involved in determining whether 14:20:07
5 payments are made to Infinitem or L.R.D. or 14:20:11
6 Scaramanga Bros.? 14:20:14

7 A Typically, it's the entity that engages 14:20:15
8 Mr. Depp or they have a long-standing relationship 14:20:19
9 with one of the entities that is the controlling 14:20:21
10 factor. 14:20:23

11 But I've enumerated earlier some of the 14:20:25
12 conditions; production, domestic, foreign, are 14:20:28
13 influences factors as to which entity is utilized. 14:20:33

14 Q Can you take a look at EWC 50, please. 14:20:36

15 This document shows the total gross 14:21:12
16 receipts for work Mr. Depp did that flowed through 14:21:17
17 Scaramanga Bros. from 2009 to 2019, full years, 14:21:20
18 right? 14:21:27

19 A It appears that you're correct. 14:21:28

20 Q And just by way of illustration, in 2014, 14:21:30
21 a little over 42 million came through Scaramanga 14:21:42
22 Bros., right? 14:21:46

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1	A	What year was that, please?	14:21:46
2	Q	2014.	14:21:51
3	A	Yes.	14:21:57
4	Q	And that number dropped off quite	14:21:58
5		substantially in 2015, right, down to	14:22:03
6		15.5 million?	14:22:06
7	A	Yes.	14:22:07
8	Q	Why is that, if you know?	14:22:08
9	A	There could be several reasons. I don't	14:22:10
10		recall the facts and circumstances in this	14:22:15
11		particular year analysis, but I'll give you	14:22:19
12		typical reasons why there is a diminution in	14:22:20
13		revenue or an increase in revenue.	14:22:22
14		If Mr. Depp is doing a substantial film,	14:22:26
15		like for Disney, there is upfront consideration	14:22:28
16		that is paid to him that is quite substantial. So	14:22:32
17		in the year in which he films there's very	14:22:35
18		substantial revenue.	14:22:38
19		If the following year he's not doing the	14:22:40
20		film and not generating that upfront revenue, it	14:22:41
21		can result in a diminution of gross receipts.	14:22:45
22	Q	In 2016, do you have any -- any reason why	14:22:48

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1	that number at a little over 16 million is so much	14:23:03
2	lower than, you know, 2010, '11, '12, '13, 14?	14:23:06
3	A I do not recall what the facts were, as	14:23:12
4	I -- as I stated earlier, but I gave you a reason.	14:23:16
5	I will give you another reason.	14:23:19
6	In addition to the fact that he may have	14:23:21
7	been filming and generating upfront revenue for	14:23:23
8	his services, there can also be a settlement of a	14:23:26
9	participation audit, and the settlement may have	14:23:31
10	materialized in 2014 and not materialized in 2015.	14:23:35
11	So there's a number of reasons to why there would	14:23:43
12	be a variation in revenue.	14:23:46
13	Performing artists don't have a constant	14:23:48
14	stream of income. They tend to work -- it's an	14:23:52
15	undulating curve. They generate more revenue when	14:23:56
16	they're actively engaged and less revenue when	14:23:58
17	they are not.	14:24:00
18	Q So you can't predict future income as a	14:24:01
19	performing artist just by looking at past income,	14:24:05
20	right?	14:24:08
21	MR. PRESIADO: Objection; calls for expert	14:24:09
22	testimony, vague and ambiguous, assumes facts not	14:24:13

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1 in evidence. 14:24:18

2 You can answer as you understand the 14:24:19

3 question. 14:24:21

4 THE WITNESS: Categorically, you cannot 14:24:21

5 predict the future. I don't know any enterprise 14:24:23

6 that can actually with certainty predict the 14:24:26

7 future. But when you have an artist who is 14:24:28

8 extremely talented and internationally acclaimed, 14:24:32

9 you can have some expectation as to what 14:24:37

10 engagements will take place in the future, 14:24:39

11 including the fact there could be contractual 14:24:39

12 rights that have already been established that 14:24:42

13 materialize in the future. 14:24:45

14 BY MR. ROTTENBORN: 14:24:46

15 Q All right. But for any given year, if 14:24:46

16 you're looking at Mr. Depp's -- the revenue that 14:24:50

17 he or his companies collected that year, you can't 14:24:54

18 pinpoint certain reasons why he made more in one 14:24:57

19 year than the next year, right? 14:25:02

20 MR. PRESIADO: Objection; misstates 14:25:04

21 testimony, assumes facts not in evidence. 14:25:05

22 THE WITNESS: I think I stated earlier 14:25:07

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1	typical reasons as to why there is a variation in	14:25:11
2	revenue, and each year would have to be analyzed	14:25:14
3	based upon its unique facts and circumstances.	14:25:18
4	BY MR. ROTTENBORN:	14:25:21
5	Q Right. And I was just -- my question was	14:25:21
6	simply that those -- those facts and circumstances	14:25:27
7	that could cause revenue to vary from year to year	14:25:31
8	aren't something that, sitting here today, you can	14:25:37
9	look at this chart and say, Yes, I know why the	14:25:39
10	revenue was X in one year and Y in another year,	14:25:43
11	right?	14:25:47
12	MR. PRESIADO: Objection; asked and	14:25:47
13	answered.	14:25:48
14	THE WITNESS: No. I'm -- I'm suggesting	14:25:48
15	to you that if you went back and looked at the	14:25:50
16	underlying documentation, you'd be able to	14:25:53
17	ascertain why he generated the revenue in our	14:25:58
18	illustration in 2014 and why he generated the	14:26:01
19	revenue in 2015.	14:26:07
20	Is that responsive to your question,	14:26:09
21	Counsel?	14:26:11
22	Q Well, good enough for now. We'll go ahead	14:26:12

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1 and move on. 14:26:17

2 If you can take a look at EWC 44, please. 14:26:20

3 This is a Profit & Loss statement for Scaramanga 14:26:44

4 Bros. for 2019, correct? 14:26:49

5 A Yes. 14:26:51

6 Q What is -- and it reflects that the gross 14:26:53

7 profit of Scaramanga Bros. was a little over 25 14:27:01

8 million. Do you see that? 14:27:04

9 A Yes. 14:27:05

10 Q What is -- how do you define "gross 14:27:07

11 profit"? 14:27:11

12 A Well, there's several definitions you can 14:27:11

13 utilize, but typically gross profit is the 14:27:18

14 receipts that the entity receives before deducting 14:27:20

15 the related business expenditures. 14:27:26

16 Q Isn't that -- wouldn't that be gross 14:27:31

17 revenue? 14:27:36

18 A No. Because -- again, you can define the 14:27:36

19 terms. Gross revenue could be before agency fees; 14:27:39

20 it could be after agency fees. There are 14:27:46

21 variables in terms of -- in the purest sense, 14:27:49

22 whatever the contract says you're entitled to 14:27:53

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1	would be gross revenue. But that's not	14:27:56
2	necessarily gross profit. Gross profit might be	14:27:58
3	that revenue less certain expenditures that were	14:28:01
4	deducted in arriving at the revenue.	14:28:04
5	Q What is -- what -- what is this gross	14:28:06
6	profit for Scaramanga Bros. in 2019? What does --	14:28:12
7	what does that include or not include?	14:28:17
8	A I do not recall. I don't have the	14:28:17
9	underlying data in front of me.	14:28:19
10	Q Do you have it in EWC 1 through 52? And	14:28:26
11	I'll just tell you it appears to me that the	14:28:34
12	Income Statements for Scaramanga Bros. cut off at	14:28:36
13	2015. But is there -- would there be a way for	14:28:42
14	you to tell with this document what are the	14:28:46
15	components of gross profit?	14:28:52
16	MR. PRESIADO: Objection; compound.	14:28:53
17	THE WITNESS: No, Counselor. I did not	14:28:54
18	review these documents in preparation for this	14:28:55
19	deposition. They're historical documents and they	14:28:58
20	would speak for themselves. I did not review	14:29:02
21	underlying data, I didn't go through a clinical	14:29:04
22	process, and that is my response to your inquiry.	14:29:07

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1 Q I understand. I'm asking you if you 14:29:12
2 believe it's discernable from the documents. 14:29:15

3 A I think the documents speak for 14:29:19
4 themselves. And there's no interpretation that I 14:29:22
5 can give you that is different than what the 14:29:24
6 documents actually state. 14:29:26

7 Q Well, you just told me that there is a 14:29:29
8 number of -- and I don't mean to argue with you, 14:29:31
9 but you testified that there is a number of 14:29:34
10 definitions that gross profit could mean, and I'm 14:29:36
11 trying to figure out here, on EWC 44, which one 14:29:38
12 are you using? 14:29:42

13 A I would have to go look at the underlying 14:29:43
14 source documents to be totally responsive to your 14:29:47
15 inquiry. And the term profit is one that's used 14:29:50
16 in various forms. Sometimes you've heard the term 14:29:56
17 "adjusted gross profit." There is a number of 14:30:00
18 different accounting procedures employed by the 14:30:04
19 American Institute of Certified Public Accountants 14:30:08
20 and by the various taxing authorities in defining 14:30:10
21 terminology; and it's not authorities consistently 14:30:13
22 applied. 14:30:15

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1 So let me be specific to respond. Other 14:30:16
2 than what the statements say for themselves, I'm 14:30:19
3 not able to add any additional information. 14:30:22

4 Q As I go through these documents, 14:30:24
5 Mr. White, I see -- well, hold on. Bear with me 14:30:34
6 one minute. 14:30:44

7 Do you know -- I do not see Income 14:30:45
8 Statements for Scaramanga Bros. after 2015. I see 14:30:53
9 Profit & Loss statements, but not Income 14:31:06
10 Statements. Do you know whether or not you would 14:31:08
11 have those at your firm? 14:31:10

12 A Well, the answer is I'd have to review 14:31:11
13 with my colleagues underlying documentation. But 14:31:16
14 when you say you have Profit & Loss statements, 14:31:19
15 typically a Profit & Loss statement has revenue, 14:31:21
16 which would be the income, and it has expenses. 14:31:25
17 So if you have the Profit & Loss statement, you 14:31:29
18 may have something substantially equivalent to 14:31:32
19 what the Income Statement would be, at least a 14:31:35

20 portion of it; "a portion of it" meaning the 14:31:37
21 statement contains the revenue and the expenses. 14:31:41

22 Q You'd agree that an Income Statement is 14:31:44

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1 different than a P&L statement, right? 14:31:46

2 A Well, if the -- if your definition of your 14:31:48

3 term is income as only income, then the answer is 14:31:50

4 yes. Because a profit and loss summary would have 14:31:54

5 income and expenses. 14:31:58

6 Q So if you go to EWC 44, which we've been 14:32:04

7 talking about... 14:32:09

8 MR. PRESIADO: Ben, is this a second page 14:32:19

9 of a -- is this part of a document? It seems to 14:32:21

10 be a second page. 14:32:24

11 MR. ROTTENBORN: It is, yes. 14:32:25

12 MR. PRESIADO: Okay. But you just want 14:32:26

13 him to -- 14:32:27

14 MR. ROTTENBORN: 43 and 44. 14:32:27

15 Q What I'm trying to figure out is why for 14:32:30

16 some years we have both Income Statements and -- 14:32:32

17 is it -- is it the case, Mr. White, that before 14:32:39

18 your -- that the -- what's produced as the Profit 14:32:43

19 & Loss statements for these companies is what your 14:32:49

20 company produced that would be the equivalent of 14:32:54

21 the Income Statements that are in this production 14:32:57

22 predating 2016. 14:33:01

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Transcript of Edward White

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1	MR. PRESIADO: Objection. That	14:33:03
2	necessarily calls for attorney-client	14:33:04
3	communications because you're asking what was	14:33:06
4	ultimately produced.	14:33:07
5	Like I said, Ben, he can testify as to	14:33:09
6	what exists. The process from the existence of	14:33:11
7	the documents to actual production to your office	14:33:15
8	necessarily involves attorney-client	14:33:17
9	communications and work product, so I'd instruct	14:33:20
10	him not to answer.	14:33:24
11	THE WITNESS: Therefore, I'll follow the	14:33:27
12	advice of -- instruction of my counsel.	14:33:32
13	Q Go to page EWC 35, please. 35 and 36.	14:33:34
14	You see where it says -- this is a Scaramanga	14:33:52
15	Bros. Income Statement ending 2015 -- for the year	14:33:55
16	2015. Do you agree with that?	14:34:03
17	A I can see that's what it states.	14:34:05
18	Q And your firm hadn't been engaged by	14:34:07
19	Mr. Depp in 2015, right?	14:34:12
20	A Correct.	14:34:13
21	Q So this document didn't come from your	14:34:15
22	firm, right?	14:34:19

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Transcript of Edward White
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1 A I'm not certain that that's factual. I do 14:34:21
2 not know who produced this document. It could 14:34:24
3 have been produced utilizing historical 14:34:28
4 information by our firm. It could have been 14:34:30
5 produced by TMG. 14:34:32

6 Q Okay. 14:34:34

7 A So I'm not certain the parties that 14:34:34
8 prepared this document. 14:34:37

9 Q All I'm trying to figure out is if you 14:34:40
10 compare EWC 35 and 36 to EWC 37 and 38 -- 14:34:42

11 (Simultaneous crosstalk.) 14:34:54

12 A What are you referencing? I kind of lost 14:34:54
13 track of your inquiry. 14:34:57

14 Q If you compared EWC 35 and 36 from 2015 14:34:58
15 that we just looked at, and then scroll down to 14:35:02
16 EWC 37 and 38, from the next year, the format and 14:35:09
17 the titles appear to be different, and I'm just 14:35:18
18 trying to figure out if that's just because of the 14:35:20
19 transition from TMG to you-all. 14:35:23

20 MR. PRESIADO: Objection; compound, vague 14:35:27
21 and ambiguous. 14:35:28

22 THE WITNESS: Counsel, I'm uncertain. I 14:35:29

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Transcript of Edward White
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1 do not know who prepared that document. I'd have 14:35:32
2 to go back and review our files and discuss the 14:35:34
3 issue with my clients, and, therefore, I cannot 14:35:37
4 respond to your inquiry as to who prepared the 14:35:40
5 document. 14:35:45
6 BY MR. ROTTENBORN: 14:35:46
7 Q All right. Then let's go back to 43 and 14:35:46
8 44, please. Where on this document are -- I 14:35:54
9 understand -- I'm just trying to figure out the 14:36:11
10 components of gross profits. So I see sources of 14:36:13
11 income here. Where -- where are the expenses 14:36:17
12 listed on this document, if at all? 14:36:25
13 A You've got income -- scroll down here. 14:36:29
14 Keep going. I don't see expenses yet. Hold on a 14:36:33
15 second. 14:36:36
16 This looks like gross profit analysis. It 14:36:40
17 doesn't look like it's got loss to it. There may 14:36:43
18 be other schedules that were -- that would be 14:36:47
19 related to this analysis -- 14:36:48
20 Q Okay. 14:36:51
21 A -- that would take the expense side of the 14:36:51
22 ledger into account. 14:36:53

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Transcript of Edward White

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1 Q Okay. If we take -- if we go to EWC 42. 14:36:55

2 MR. ROTTENBORN: Scroll up a couple, 14:37:30

3 please. 14:37:31

4 Q Do you see where it's listed as gross 14:37:42

5 profit? 14:37:45

6 A Yes. 14:37:45

7 Q \$15.8 million? 14:37:45

8 A Yes. 14:37:49

9 Q Let's go to EWC 50. And my question is 14:37:52

10 just going to be: Is that gross profit number 14:37:59

11 that's listed at the bottom of these Profit & Loss 14:38:03

12 statements, that -- that's identical to what's 14:38:06

13 listed for 2018 in the summary row on EWC 50, 14:38:08

14 right? I think you have to scroll down just a 14:38:18

15 little bit. 14:38:21

16 A Counselor, without going to a detailed 14:38:25

17 analysis of these schedules, it's difficult for me 14:38:27

18 to reconcile them. I didn't review them before 14:38:30

19 this deposition. And all I can say is the 14:38:32

20 schedules speak for themselves and I cannot 14:38:35

21 provide additional information at this time. 14:38:38

22 Q And -- okay. So if you look at total 14:38:40

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Transcript of Edward White
Conducted on February 2, 2022

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1 gross receipts reported on tax returns on EWC 50 14:38:45
2 there at the bottom -- 14:38:50
3 A On tax returns? 14:38:51
4 Q Do you see the row that's entitled Total 14:38:55
5 Gross Receipts Reported on Tax Returns? 14:38:58
6 A I don't see the line item that says total 14:39:02
7 revenue produced or reported on tax returns. 14:39:12
8 Q Right by the curser. The bottom left. 14:39:17
9 A Oh, at the bottom, all the way down. 14:39:20
10 Total Gross Receipts Reported on Tax Returns. 14:39:22
11 Fine. What's your inquiry? 14:39:24
12 Q My question is: The numbers in that row, 14:39:26
13 as you go over year by year, reflect -- however 14:39:31
14 it's defined, the gross profit from Scaramanga 14:39:38
15 Bros. by you, right? 14:39:44
16 MR. PRESIADO: Objection; misstates the 14:39:46
17 document. It says "gross receipts," not "gross 14:39:47
18 profits." 14:39:52
19 Q Gross receipts, yeah. Sorry, gross 14:39:52
20 receipts. 14:39:56
21 A So, other than what the schedule is 14:39:56
22 indicating, is there a question about -- that I 14:40:00

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Transcript of Edward White

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1 can respond to? 14:40:04

2 Q I'm just asking you -- I'm trying to 14:40:04

3 figure out what is included in these schedules. 14:40:07

4 So I'm -- my question for you is: This document 14:40:10

5 summarizes the gross receipts to Scaramanga Bros. 14:40:16

6 by year, and that's reflected in the line that's 14:40:23

7 titled Total Gross Receipts Reported on Tax 14:40:25

8 Returns; is that right? 14:40:28

9 A That's -- again, Counselor, I think the 14:40:29

10 schedule speaks for itself, and I cannot augment 14:40:33

11 the schedule by -- with some additional analytical 14:40:35

12 comments. 14:40:42

13 Q You'd have to -- okay. And in order to 14:40:42

14 figure out how the gross receipts -- strike that. 14:40:47

15 A Can you restate -- is that a question? 14:40:56

16 I'm so con- -- 14:40:57

17 MR. PRESIADO: There's no question 14:40:58

18 pending. 14:40:59

19 THE WITNESS: No question pending. 14:40:59

20 MR. PRESIADO: No question. No question. 14:41:01

21 MR. ROTTENBORN: Can you please pull up 14:41:26

22 EWC 53 through 76. 14:41:30

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Transcript of Edward White

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1 And all these documents that we're pulling 14:41:33
2 up, Amy, we'll want them marked as exhibits. I 14:41:35
3 don't know if I've introduced them, but whatever 14:41:37
4 the number is. 14:41:41

5 AV TECHNICIAN: This will be Exhibit 3. 14:41:44

6 (Exhibit 3, Profit & Loss statements, 14:41:56

7 Bates Nos. EWC000053 through EWC000076, was marked 14:41:56

8 for identification and is attached to the 14:41:56

9 transcript.) 14:42:06

10 AV TECHNICIAN: Exhibit 3. 14:42:06

11 BY MR. ROTTENBORN: 14:42:07

12 Q Mr. White, these are Profit & Loss 14:42:07

13 statements. And you can scroll through this as 14:42:20

14 much as you need. 14:42:21

15 First of all -- well, I'll ask this: I 14:42:23

16 assume you did not make the redactions in this 14:42:25

17 document, right? 14:42:29

18 MR. PRESIADO: Yeah, for the record, that 14:42:34

19 was not the witness. 14:42:35

20 MR. ROTTENBORN: And -- okay. I'll move 14:42:37

21 on. 14:42:44

22 Q You can scroll through this document if 14:42:48

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Transcript of Edward White
Conducted on February 2, 2022

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1 you want, but my question is simply: Are these 14:42:49
2 the Profit & Loss statements for Infinitum Nihil, 14:42:51
3 L.R.D. Productions, and Scaramanga Bros. for 14:42:57
4 January -- or for 2020 and 2021? 14:43:00

5 A They certainly appear to be. I mean, I 14:43:04
6 have no reason to believe they're not. But I -- 14:43:11
7 once again, I'm looking at this schedule for the 14:43:13
8 first time in a very long time and I do not recall 14:43:16
9 exactly why it was constructed, what the 14:43:19
10 circumstances were. 14:43:21

11 Q How long after a year end -- well, let me 14:43:22
12 ask you this: Are Mr. -- how long after a 14:43:26
13 calendar year end would -- would it take for your 14:43:29
14 firm to prepare the yearly Profit & Loss 14:43:35
15 statements? 14:43:37

16 A Depends upon which statement you're 14:43:37
17 referring to. The actual construction of the 14:43:41
18 information would not take that long because, as I 14:43:45
19 mentioned to you earlier, we maintain the journals 14:43:47
20 and the ledgers. And, therefore, drawing off what 14:43:50
21 we call an unadjusted trial balance could be done 14:43:53
22 within -- a couple weeks after the year end. And 14:43:58

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Transcript of Edward White

Conducted on February 2, 2022

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1 then you go through an adjusted process, and then 14:44:00
2 of course it has to be modified again to be in 14:44:03
3 conformity with foreign, domestic, and state tax 14:44:06
4 requirements. 14:44:10

5 Q So the Profit & Loss statements included 14:44:11
6 in this document bundle from 2020 would have been 14:44:14
7 available within the first few weeks of 2021? 14:44:17

8 A I didn't state that. You asked the 14:44:20
9 question how long could it be. How long would it 14:44:23
10 take to possibly construct an unadjusted trial 14:44:25
11 balance. And I responded: It could happen in a 14:44:29
12 few weeks. 14:44:32

13 As to when this was produced and under 14:44:33
14 what circumstances, I'm not familiar with this. 14:44:35
15 I'm looking at the schedule just as you are. I'd 14:44:36
16 have to make inquiries to find out when this 14:44:40
17 document was actually produced. 14:44:43

18 Q And who would you inquire with? Someone 14:44:45
19 on your team? 14:44:49

20 A Yes. One of the members of my team who 14:44:50
21 actively provides services for Mr. Depp, I would 14:44:52
22 make inquiries with those people. 14:44:55

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Transcript of Edward White

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1 Q Would it be common to provide this 14:44:57
2 information to Mr. Depp in, say, the first quarter 14:44:59
3 of 2020? 14:45:03

4 A We respond to Mr. Depp in accordance with 14:45:05
5 his request. And it would not be common that we 14:45:09
6 would necessarily send him the type of schedules 14:45:15
7 that you've been showing me within the first 14:45:18
8 quarter. If he has inquiries, we -- we would -- 14:45:19
9 we would respond in a very timely manner, meaning 14:45:23
10 in the first -- within 30 days. 14:45:28

11 But in response to your question were 14:45:31
12 these statements produced with the objective to 14:45:33
13 sending them to Mr. Depp, the answer is no; 14:45:37
14 they're produced for other reasons. 14:45:40

15 Q And what are those reasons? 14:45:41

16 A We have to file tax returns for Mr. Depp 14:45:43
17 and his entities. In order to file tax returns, 14:45:47
18 you take out of the journals and the ledgers an 14:45:51
19 unadjusted trial balance, then you go through an 14:45:56
20 adjusting process. So we're producing these 14:45:58
21 documents primarily for our internal use in order 14:46:01
22 to be in compliance with the various taxing 14:46:05

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Transcript of Edward White

Conducted on February 2, 2022

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1 authorities. 14:46:07

2 Q So for the 2020 Profit & Loss statements 14:46:08

3 would you have produced those for your internal 14:46:12

4 use prior to filing Mr. Depp's 2020 taxes? 14:46:14

5 MR. PRESIADO: Objection; vague and 14:46:18

6 ambiguous as to "produced." Do you mean create or 14:46:21

7 prepare, or do you mean "produced" in the context 14:46:24

8 of litigation? 14:46:27

9 Q You can answer, Mr. White. 14:46:30

10 MR. PRESIADO: You can answer, if you 14:46:33

11 understand it. 14:46:36

12 THE WITNESS: I don't know the timing of 14:46:36

13 when these documents were created, and I don't 14:46:37

14 know the origin of why they were created. I gave 14:46:42

15 you what I thought would be a reasonable 14:46:45

16 explanation, which is: We create financial 14:46:46

17 statements for several reasons. One is to be 14:46:49

18 compliant with taxing authorities. Others might 14:46:53

19 be that financial institutions that made loans to 14:46:56

20 Mr. Depp would like financial information about 14:46:59

21 his capacity. 14:47:02

22 So there would be a number of reasons why 14:47:03

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Transcript of Edward White

Conducted on February 2, 2022

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1 a profit and loss statement might be produced, as 14:47:05
2 you called it, I call it created, within the -- 14:47:09
3 from -- by my colleagues at EWC. 14:47:14
4 Q Is it -- would it be safe to assume that 14:47:18
5 the 2020 Profit & Loss statements were created 14:47:20
6 over a month ago? 14:47:25
7 A For 2020? 14:47:27
8 Q Yes. 14:47:30
9 A Oh, yes. We had to -- for 2020 we had to 14:47:31
10 file tax returns for these entities in a timely 14:47:36
11 manner, and it clearly would have not been created 14:47:39
12 in -- in -- I guess you're saying January of '22. 14:47:43
13 Q Right. So they would have been created 14:47:48
14 before you filed those timely tax returns? 14:47:50
15 A Yes. If this information was used in the 14:47:53
16 preparation of the tax returns, they would have 14:47:55
17 been produced notably before the compliance 14:47:57
18 scheduled dates. 14:48:03
19 Q And when did you get -- file Mr. Depp's 14:48:05
20 tax returns for 2020? 14:48:08
21 A Which tax return are you referring to? 14:48:10
22 Q For the three businesses. 14:48:13

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Transcript of Edward White

Conducted on February 2, 2022

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1 A They have to be filed by September 15th of 14:48:16
2 '21. So they would have been filed on or before 14:48:22
3 that date. And I cannot tell you the date that 14:48:26
4 they were filed because it's -- I'd have to speak 14:48:28
5 with my colleagues and look at the schedules to 14:48:30
6 see the actual date. But before -- 14:48:32
7 Q So -- 14:48:34
8 A -- September 15th of '21. 14:48:35
9 Q So the 2020 Profit & Loss statements for 14:48:37
10 Mr. Depp's companies would have been created by 14:48:40
11 your firm prior to September 15, 2021? 14:48:44
12 A If these statements were created for the 14:48:47
13 purpose of being compliant with the taxing 14:48:51
14 authorities, the answer is yes. I don't know the 14:48:54
15 reason why these particular statements were 14:48:57
16 constructed or the timing of them. There could 14:48:59
17 have been other reasons for these, and I'd have to 14:49:01
18 look into the purpose for the construction of 14:49:03
19 these statements. 14:49:07
20 But generally speaking, statements are 14:49:08
21 created well before the compliance date of -- to 14:49:10
22 be compliant with the taxing authorities. 14:49:15

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Transcript of Edward White
Conducted on February 2, 2022

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1	Q	Were you aware that these documents were	14:49:17
2		just produced to us late last night?	14:49:19
3	MR. PRESIADO:	Objection; necessarily	14:49:24
4		calls for attorney-client communications, if, in	14:49:25
5		fact, he can answer that question, so I would	14:49:29
6		instruct him not to answer.	14:49:31
7	THE WITNESS:	What is your recommendation,	14:49:32
8		Counsel?	14:49:37
9	MR. PRESIADO:	I instruct you not to	14:49:38
10		answer.	14:49:39
11	THE WITNESS:	Okay.	14:49:40
12		I will follow the advice of my counsel and	14:49:40
13		not respond.	14:49:42
14	Q	Can you look at EWC 54, please.	14:49:43
15		Am I reading this correctly, that	14:49:57
16		Infinitum Nihil had a negative net income of over	14:49:59
17		a million dollars in 2020?	14:50:02
18	A	Yes.	14:50:05
19	Q	Do you have any personal knowledge of why	14:50:09
20		its net income was negative?	14:50:13
21	A	I don't. I do not have at my disposal the	14:50:15
22		actual facts associated with the circumstance.	14:50:18

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Transcript of Edward White

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1	But generally speaking, a production company can	14:50:21
2	have profit in one year and have expenses in	14:50:23
3	another year where revenue is not equal to or in	14:50:27
4	excess of the expenses. So it's not uncommon for	14:50:33
5	a production company to have viability in one year	14:50:35
6	and a lack of viability in another year.	14:50:39
7	Q If you go to --	14:50:42
8	MR. ROTTENBORN: Actually, why don't we	14:51:00
9	take a short break. I want to see if I can short-	14:51:01
10	circuit some of this.	14:51:03
11	THE WITNESS: Absolutely. That's fine.	14:51:05
12	MR. PRESIADO: Hold on. Ten minutes, five	14:51:06
13	minutes?	14:51:08
14	THE VIDEOGRAPHER: Off the record at 2:51.	14:51:08
15	(Recess was held.)	15:02:50
16	THE VIDEOGRAPHER: Back on the record at	15:02:50
17	3:02.	15:03:00
18	BY MR. ROTTENBORN:	15:03:01
19	Q Mr. White, I am going to ask you just a	15:03:04
20	couple more questions about these financial	15:03:11
21	statements and I -- it's hard to do over Zoom.	15:03:14
22	But I'm just going to ask you to take a look at	15:03:20

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Transcript of Edward White
Conducted on February 2, 2022

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1	two different documents.	15:03:23
2	MR. ROTTENBORN: And, Catherine, I'm going	15:03:25
3	to -- they're in two different documents, so...	15:03:26
4	The first one is the last exhibit that we had up,	15:03:29
5	EWC 54. It's that page. It's the document	15:03:33
6	starting EWC 53.	15:03:42
7	AV TECHNICIAN: Stand by.	15:03:50
8	MR. ROTTENBORN: If you can just scroll	15:04:09
9	down to page 54. Okay. Right there.	15:04:10
10	BY MR. ROTTENBORN:	15:04:20
11	Q So this is the Infinitum Nihil profit and	15:04:20
12	loss statement from 2020, right?	15:04:26
13	A That's what the statement indicates,	15:04:28
14	January through December 2020.	15:04:32
15	Q And your firm prepared this?	15:04:34
16	A I can't say categorically, but it's	15:04:36
17	certainly quite possible.	15:04:42
18	Q Okay. So -- and I'm going to preview my	15:04:43
19	question because it's so cumbersome to go back and	15:04:48
20	forth, but I'm just trying to figure out -- it	15:04:51
21	says Net Income and then it lists a number. The	15:04:52
22	document I'm going to pull up next is the	15:04:56

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Transcript of Edward White
Conducted on February 2, 2022

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1	Infinitum 2019 Profit & Loss statement, and it	15:04:59
2	says Gross Profit and it lists a number.	15:05:03
3	And so my question for you -- and I'll	15:05:06
4	reask it when we pull the document up. But my	15:05:08
5	question for you is just -- I'm just trying to	15:05:11
6	figure out: Are these gross profits synonymous	15:05:13
7	with net income for the purposes of looking at	15:05:17
8	these yearly P&L statements?	15:05:21
9	A No.	15:05:24
10	MR. ROTTENBORN: So with that in mind,	15:05:26
11	let's go ahead and pull up the previous exhibit,	15:05:28
12	and we're going to go to EWC 11.	15:05:33
13	Q So why is the answer no, Mr. White?	15:05:55
14	A Because gross profit does not have a	15:05:57
15	definition equivalent to net income. Net income	15:06:00
16	takes the gross profit, deducts the expenses	15:06:03
17	associated with production of that revenue, and	15:06:06
18	arrives at a net number.	15:06:09
19	Q Did your firm change the manner in which	15:06:11
20	it presented yearly profit and loss statements	15:06:14
21	between 2019 and 2020?	15:06:18
22	A Not to my recollection. I don't know the	15:06:19

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Transcript of Edward White
Conducted on February 2, 2022

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1 purpose of these statements and what -- when they 15:06:23
2 were constructed. But clearly, if we're producing 15:06:26
3 total information, it would include the expenses 15:06:31
4 as well as the revenue. 15:06:33

5 Q So if you're looking at a P&L statement 15:06:34
6 that has a bottom line that represents a gross 15:06:39
7 profit figure, that's not the same as looking at a 15:06:42
8 P&L statement that has a bottom line that's called 15:06:45
9 "net income"; is that right? 15:06:48

10 A That is correct. 15:06:52

11 Q Do you -- do you know why -- and you can 15:06:53
12 take as long as you want to go back and look 15:07:06
13 through EWC 53 through 76. And I don't want to be 15:07:09
14 insufficient here, but do you -- I'll tell you 15:07:17
15 that all of those P&Ls end with net income, and 15:07:19
16 all of the ones on EWC 1 through 52 end with gross 15:07:24
17 profit. Do you know why that is? 15:07:28

18 A No. 15:07:29

19 Q But what you're telling me is that we're 15:07:29
20 not looking at an apples-to-apples comparison 15:07:38
21 between the documents in EWC 1 through 52 and 15:07:41
22 EWC 53 through 76 when it comes to the Profit & 15:07:47

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Transcript of Edward White

Conducted on February 2, 2022

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1	Loss statements; is that right?	15:07:51
2	MR. PRESIADO: Objection; vague and	15:07:52
3	ambiguous.	15:07:53
4	THE WITNESS: Statements are prepared for	15:07:53
5	various purposes. There may have been statements	15:07:58
6	prepared for gross profit because it was a	15:08:02
7	requirement to construct such a schedule. There	15:08:06
8	may be other requirements to produce net profit.	15:08:10
9	And I'm not certain what the requirements were	15:08:13
10	that resulted in the production or the creation of	15:08:16
11	these statements.	15:08:19
12	Q What's required for tax filing purposes?	15:08:21
13	A Let's just take a corporate income tax	15:08:24
14	return for purposes of illustration. You report	15:08:28
15	all the revenue, if it's a cash basis taxpayer,	15:08:31
16	based upon the cash received. If it's accrual,	15:08:36
17	it's based upon the accrual analysis. You deduct	15:08:39
18	expenses, if it's cash basis, that were actually	15:08:42
19	paid, and you arrive at taxable income. So it's	15:08:46
20	revenue less expenses to arrive at taxable income.	15:08:48
21	Q What would be the purpose of creating a	15:08:54
22	profit and loss statement that just lists gross	15:08:57

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Transcript of Edward White
Conducted on February 2, 2022

111

1	profit?	15:09:00
2	A There could be a lot of purposes. By way	15:09:00
3	of illustration, the reader may be interested just	15:09:05
4	in gross receipts, not in net profit for a wide	15:09:08
5	variety of business objectives.	15:09:12
6	Q And what would be -- is that -- does that	15:09:15
7	answer hold true for a profit and loss statement	15:09:18
8	that just shows net income instead of gross	15:09:20
9	profit?	15:09:24
10	A Well, a company -- if it had only the	15:09:24
11	expenses and a net income number, I think that	15:09:27
12	might be atypical. Typically if it's net income	15:09:30
13	it shows that -- the receipts and the	15:09:34
14	disbursements and then a net number.	15:09:37
15	But sometimes schedules are produced	15:09:40
16	solely because they want to understand the revenue	15:09:42
17	comparison, not because they want to understand	15:09:46
18	the net income comparison.	15:09:49
19	Q Okay. Let me -- let me ask it	15:09:54
20	--- differently, then. Is the -- because I think I --	15:10:00
21	I'm not an accountant, so I'm just trying to do my	15:10:07
22	best here. Is the -- you see the gross profit	15:10:09

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Transcript of Edward White

Conducted on February 2, 2022

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1	number there for -- for 2019, Infinitum, right?	15:10:14
2	A Yes.	15:10:21
3	Q Is the equivalent for 2019 -- or, I'm	15:10:22
4	sorry, for 2020 going to be what we see at EWC 53?	15:10:28
5	MR. ROTTENBORN: So, Catherine, if you can	15:10:32
6	go back to the latest exhibit, please.	15:10:33
7	Q Is that -- is that the equivalent to where	15:10:51
8	it says "gross profit" on, like, the fifth line	15:10:53
9	down?	15:10:55
10	A It could be. Again, I'm not looking at	15:10:55
11	the underlying source documents. But it could be	15:10:59
12	that the gross profit depicted on this Profit &	15:11:02
13	Loss summary in concept is equivalent to what you	15:11:06
14	saw in '19 for gross profit.	15:11:08
15	Q Understood. Okay. All right.	15:11:12
16	Thank you. I think we can -- we can set	15:11:15
17	those documents to the side for now.	15:11:17
18	A Okay.	15:11:21
19	Q How do you know Adam Waldman?	15:11:21
20	A How do I know him?	15:11:30
21	Q (Nonverbal response.)	15:11:32
22	A In what dimension? I'm not sure the	15:11:34

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Transcript of Edward White
Conducted on February 2, 2022

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1	nature of the --	15:11:37
2	Q When did you first meet -- when did you	15:11:37
3	first meet him?	15:11:39
4	A I do not recall. It was years ago.	15:11:40
5	Q Did you introduce him to Johnny?	15:11:46
6	A No.	15:11:48
7	Q Do you remember a dinner at your house --	15:11:51
8	that you hosted at your house where Johnny met	15:11:56
9	Adam for the first time?	15:12:00
10	A That is my general recollection. I don't	15:12:01
11	recall the date, but I did host a dinner at my	15:12:03
12	home, and I believe that Mr. Wald- -- Waldman	15:12:07
13	attended.	15:12:11
14	Q And did you understand that that was the	15:12:11
15	first time that Johnny had -- was introduced to	15:12:13
16	Mr. Waldman?	15:12:17
17	A No. I did not know the time in which he	15:12:17
18	was first introduced.	15:12:21
19	Q Are you -- and pardon me if I asked a	15:12:22
20	question similar to this, but are you the one who	15:12:24
21	introduced Mr. Waldman to Mr. Depp?	15:12:27
22	A No. I did not know Mr. Waldman prior to	15:12:29

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Transcript of Edward White

Conducted on February 2, 2022

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1	becoming acquainted with him, and I did not	15:12:37
2	introduce him to Mr. Depp.	15:12:39
3	Q Who -- who asked you to host or -- if	15:12:40
4	anyone -- how did it come to pass that you hosted	15:12:45
5	a dinner at your house with Mr. Waldman and	15:12:48
6	Mr. Depp?	15:12:51
7	A I do not recall.	15:12:52
8	Q Had you ever met Mr. Waldman before that	15:12:55
9	dinner?	15:12:57
10	A Not to my recollection. I believe that's	15:12:58
11	the first time I met him.	15:13:01
12	Q Have you ever been involved with him in	15:13:02
13	any professional context other than through	15:13:09
14	Mr. Depp?	15:13:13
15	A No.	15:13:13
16	Q When was the last time you spoke to	15:13:14
17	Mr. Waldman?	15:13:19
18	A I do not recall.	15:13:19
19	Q Who was at the dinner with Mr. Depp and	15:13:21
20	Mr. Waldman at your house?	15:13:24
21	A I do not recall. There were several	15:13:27
22	people.	15:13:30

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Transcript of Edward White

Conducted on February 2, 2022

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1 Q Who -- who were some of them? Anyone you 15:13:31

2 can recall? 15:13:35

3 A Mr. Depp was there. I do not recall the 15:13:36

4 other parties. 15:13:41

5 Q You don't recall -- you have no idea who 15:13:44

6 they were? 15:13:46

7 A I do not recall who attended. If you want 15:13:47

8 me to go back and look at my files and ascertain 15:13:51

9 who attended, I will comply with your request. 15:13:54

10 Q Yeah. I mean, if you -- if you're able to 15:13:58

11 do that on a lunch break, that would be great. 15:14:05

12 Do you know who set up Mr. Depp's 15:14:08

13 Instagram account? 15:14:11

14 A No. 15:14:13

15 Q Okay. And the only reason I'm asking that 15:14:14

16 is because at his deposition Johnny said we should 15:14:17

17 ask you because you would certainly know. 15:14:20

18 MR. PRESIADO: Objection to the extent it 15:14:22

19 misstates the record, assumes facts not in 15:14:24

20 evidence. 15:14:27

21 THE WITNESS: I do not know who set up the 15:14:29

22 account. 15:14:30

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Transcript of Edward White

Conducted on February 2, 2022

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1	Q Who from -- who of Johnny's -- other than	15:14:31
2	Mr. Depp himself and other than lawyers, I	15:14:39
3	don't -- I don't want to know about that, who do	15:14:42
4	you have -- when you say regular professional	15:14:45
5	contact with relating to the services you provided	15:14:50
6	Johnny?	15:14:53
7	A My colleagues and I -- so it would be more	15:14:56
8	inclusive to just me -- have regular contact with	15:15:01
9	Jack Whigham, with Mr. Depp, and with his	15:15:04
10	counselors at -- at Brown.	15:15:09
11	Q What about Christi Dembrowski?	15:15:13
12	A I do not -- I haven't spoken to Christi in	15:15:21
13	some time. One of my colleagues probably	15:15:23
14	maintains an active basis of communication between	15:15:25
15	her and our firm.	15:15:30
16	Q Okay. Anyone else you -- your colleagues	15:15:32
17	maintain a regular communication with?	15:15:36
18	A Well, certainly we maintain an active	15:15:38
19	relationship with the banks that provide him with	15:15:42
20	capital that he utilizes for purposes of operating	15:15:46
21	his business, insurance agents, real estate	15:15:49
22	management companies, other people who have an	15:15:53

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Transcript of Edward White

Conducted on February 2, 2022

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1 ongoing normal business relationship with him. My 15:15:56
2 colleagues and I would dialogue with him from time 15:15:59
3 to time. 15:16:02

4 Q Have you ever met Amber Heard? 15:16:03

5 A No. 15:16:06

6 MR. PRESIADO: Ben -- 15:16:10

7 Q She -- 15:16:10

8 MR. PRESIADO: Ben, it's 12:15. Is this a 15:16:12
9 good time to break? 15:16:14

10 MR. ROTTENBORN: Yeah, sure. 15:16:15

11 MR. PRESIADO: It looks like you're moving 15:16:16
12 on to a separate topic. Okay, let's take a break. 15:16:18

13 Half an hour? We'll be back at 12:46. Thanks. 15:16:21

14 THE VIDEOGRAPHER: Off the record at 3:16. 15:16:24

15 (Recess was held.) 15:22:03

16 THE VIDEOGRAPHER: Back on the record at 15:48:01

17 3:48. 15:48:08

18 BY MR. ROTTENBORN: Catherine, can you 15:48:12

19 please pull up the exhibit that starts with 15:48:13

20 DEPP 18508, Depp tax returns, please. 15:48:18

21 (Exhibit 4, Mr. Depp's tax returns, Bates 15:48:48

22 Nos. DEPP00018508 through DEPP00018594, was marked 15:48:48

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Transcript of Edward White
Conducted on February 2, 2022

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1 for identification and is attached to the 15:48:48
2 transcript.) 15:48:49
3 AV TECHNICIAN: Exhibit 4. 15:48:49
4 MR. ROTTENBORN: Thank you. 15:48:50
5 BY MR. ROTTENBORN: 15:48:51
6 Q Mr. White, I don't think I'm going to have 15:48:51
7 too many questions about these, but I just wanted 15:48:53
8 to confirm with you that these are Mr. Depp's tax 15:48:55
9 returns from the years 2011 to 2019. I'll 15:49:09
10 represent to you Mr. Depp has produced them. 15:49:13
11 They're in order. You can scroll through them, 15:49:14
12 but I figured you were probably the one to confirm 15:49:17
13 that point. So I'll -- 15:49:21
14 A They certainly appear to be his tax 15:49:23
15 returns. I'm looking at the 2011 Individual 15:49:25
16 Income Tax Return and it appears to be accurate. 15:49:28
17 Obviously, I'm not looking at our files, but this 15:49:32
18 appears to be a correct tax return for Mr. Depp. 15:49:35
19 Q Okay. 15:49:41
20 MR. ROTTENBORN: And if you could just -- 15:49:42
21 someone could just scroll to the end, please. 15:49:43
22 Like, maybe 15 -- 18589, please. It's, like, 15:49:47

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Transcript of Edward White

Conducted on February 2, 2022

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1	three or four up from the bottom.	15:50:00
2	BY MR. ROTTENBORN:	15:50:22
3	Q And while you're looking at that,	15:50:22
4	Mr. White, your firm -- I think I've asked you	15:50:24
5	this, but just to confirm, your firm prepared the	15:50:26
6	tax filings for Mr. Depp and his related companies	15:50:30
7	from 2016 on; is that right?	15:50:32
8	A Yes, that is correct.	15:50:34
9	Q And do these appear to be tax returns for	15:50:38
10	Mr. Depp and -- and his companies, at least in	15:50:40
11	part?	15:50:45
12	A Yes.	15:50:46
13	Q Okay. That's all I have about that	15:50:46
14	document; unless you need to see any more of it.	15:50:59
15	The next document I want to ask you about	15:51:03
16	is the document that starts with DEPP 18328.	15:51:05
17	(Exhibit 5, Tax returns for Infinitum	15:51:05
18	Nihil, Bates Nos. DEPP00018328 through	15:51:05
19	DEPP00018377, was marked for identification and is	15:51:05
20	attached to the transcript.)	15:51:05
21	Q And, again, Mr. White, recognizing that --	15:51:25
22	AV TECHNICIAN: Exhibit 5.	15:51:32

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Transcript of Edward White

Conducted on February 2, 2022

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1	MR. ROTTENBORN: Thank you.	15:51:35
2	BY MR. ROTTENBORN:	15:51:35
3	Q Recognizing that at least for some of	15:51:35
4	these years your firm did not do work for Mr. Depp	15:51:38
5	or his companies, can you just scroll through	15:51:41
6	these. And my question for you is: Do these also	15:51:43
7	appear to be tax returns for Mr. Depp or his	15:51:46
8	companies for various years?	15:51:52
9	A Yes.	15:51:54
10	Q Has -- to your knowledge, has there ever	15:51:54
11	been a time when -- over the course of the work	15:52:09
12	that you've done where you'd become aware of an	15:52:11
13	error -- a material error on Mr. Depp's tax	15:52:16
14	returns, or are these tax returns, you know,	15:52:22
15	generally accurate to the best of your knowledge?	15:52:24
16	MR. PRESIADO: Objection to the extent it	15:52:28
17	calls for speculation, assumes facts not in	15:52:30
18	evidence, lacks foundation.	15:52:34
19	THE WITNESS: Excuse me a second.	15:52:38
20	Thank you for your patience. I had a	15:52:56
21	little something in my throat there.	15:53:00
22	Q No problem.	15:53:02

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Transcript of Edward White
Conducted on February 2, 2022

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1	A I do not recall the adjustments that we	15:53:03
2	may have made to any historical tax returns.	15:53:08
3	It -- does that respond to your question?	15:53:14
4	Q Yeah. Are there any -- are there any	15:53:16
5	material adjustments that you can recall from the	15:53:28
6	years 2019 through 2021?	15:53:30
7	A I do not recall any material adjustments.	15:53:34
8	Q What about 2016 to 2019?	15:53:40
9	A Well, in those years we prepared the	15:53:43
10	returns. And I don't believe that there were any	15:53:47
11	material adjustments that we made to those	15:53:51
12	returns.	15:53:53
13	Q Did Mr. Depp ever express an unwillingness	15:53:54
14	or a desire not to pay taxes owed?	15:54:09
15	A No. In fact, he's been a very cooperative	15:54:12
16	and very forthcoming client and very much wanted	15:54:16
17	to satisfy all of his tax liabilities.	15:54:20
18	Q Do you have any --	15:54:23
19	MR. ROTTENBORN: You can take away that	15:54:25
20	document. Thanks.	15:54:26
21	Q Do you have any familiarity with how much	15:54:27
22	Mr. Depp donates to charities?	15:54:31

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Transcript of Edward White
Conducted on February 2, 2022

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1	A Not to my recollection. I'd have to go	15:54:34
2	back to my records and see what his donations may	15:54:37
3	have been. I know that he's a loving and generous	15:54:43
4	person, but during the period of our engagement we	15:54:45
5	were also primarily responsible for satisfying	15:54:47
6	obligations to third parties.	15:54:50
7	Q Can you recall any charitable donations	15:54:51
8	Mr. Depp has made during the period of your	15:54:55
9	engagement?	15:54:57
10	MR. PRESIADO: Objection to the extent it	15:54:58
11	calls for speculation, personal knowledge,	15:55:00
12	relevance. And I -- and this line of questioning	15:55:07
13	is contrary to an order in this case, Ben, so I'd	15:55:11
14	instruct him not to answer based on that order	15:55:19
15	with respect to Mr. Depp's charitable givings.	15:55:23
16	MR. ROTTENBORN: What order are you	15:55:28
17	referring to? I understand that the Court -- I	15:55:30
18	understand that the Court limited discovery on	15:55:31
19	certain -- discovery of certain information	15:55:34
20	document-wise based on certain grounds, but	15:55:37
21	there's been no -- there's been no court order	15:55:40
22	that I'm not allowed to ask Mr. White about that.	15:55:43

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Transcript of Edward White

Conducted on February 2, 2022

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1 MR. PRESIADO: Well, there's been a court 15:55:47
2 order as to production of the documents, which de 15:55:48
3 facto is -- makes the -- that line of questioning 15:55:51
4 off limits. 15:55:54

5 MR. ROTTENBORN: I completely disagree. 15:55:55

6 Are you instructing the witness not to 15:55:57
7 answer -- 15:55:59

8 MR. PRESIADO: Yes. 15:55:59

9 MR. ROTTENBORN: -- any questions about 15:56:00
10 Mr. Depp's charitable donations? 15:56:02

11 MR. PRESIADO: Yes. Based on that order 15:56:04
12 precluding -- precluding the production of those 15:56:05
13 documents. 15:56:10

14 THE WITNESS: Therefore, I'll follow the 15:56:11
15 instructions from counsel -- my counsel. 15:56:12

16 BY MR. ROTTENBORN: 15:56:16

17 Q Are you aware whether Mr. Depp has 15:56:16
R 18 borrowed any money from a bank or any other 15:56:44
19 financial institution during the course of your 15:56:46
20 engagement? 15:56:48

21 A Yes. 15:56:49

R 22 Q How much? 15:56:49

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Transcript of Edward White

Conducted on February 2, 2022

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1 A In varying forms at various times in order 15:56:52

2 to satisfy obligations. 15:56:59

R 3 Q What obligations? 15:57:00

4 A To third parties, to other financial 15:57:04

5 institutions. A wide variety of obligations 15:57:08

6 including tax responsibilities. 15:57:15

R 7 Q From what banks does Mr. Depp borrow? 15:57:16

8 A He has borrowed capital historically from 15:57:27

9 City National Bank, Bank of California, and from 15:57:36

10 CalPrivate Bank. He also historically, I believe, 15:57:41

11 had obligations to Bank of America. 15:57:44

12 Q Is there someone sitting in the room with 15:57:48

13 you? 15:57:52

14 MR. PRESIADO: Yeah; both counsel are in 15:57:52

15 the -- we're all in the same room, Ben. 15:57:53

16 THE WITNESS: Yes. 15:57:55

17 MR. ROTTENBORN: Oh, okay. All right. 15:57:56

18 MR. PRESIADO: We have been since the 15:57:58

19 inception of this deposition. 15:58:00

20 THE WITNESS: But no one else. 15:58:01

21 MR. ROTTENBORN: Got it. Okay. I wasn't 15:58:03

22 aware of whether you were in the same room or not. 15:58:04

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Transcript of Edward White

Conducted on February 2, 2022

125

1 MR. PRESIADO: Yeah. 15:58:06

2 BY MR. ROTTENBORN: 15:58:08

3 FSPK, Q Do you have any testimony -- any knowledge 15:58:08
R, 4 on how Mr. Depp's alcohol use has affected his 15:58:30
P, IO, career? 15:58:35
VA, 5
AF

6 MR. PRESIADO: Objection; asked and 15:58:36
7 answered. 15:58:37

8 You can answer. 15:58:40

9 THE WITNESS: I have no knowledge that 15:58:41
10 alcohol has in any manner affected his career. 15:58:46

11 FSPK, Q Do you have any knowledge on how Mr. Al- 15:58:49
R, P, IO, -- or Mr. Depp's drug use has affected his career? 15:58:53
VA, 12
AF

13 MR. PRESIADO: Objection; assumes facts 15:58:56
14 not in evidence, calls for speculation. 15:58:58

15 THE WITNESS: I have no knowledge that any 15:58:59
16 alleged drug -- drug use has in any way affected 15:59:02
17 his career. 15:59:07

18 FSPK, Q You're aware that Mr. Depp has struggled 15:59:08
R, P, IO, with the use of drugs in the past, right? 15:59:10
VA, 19

20 AF MR. PRESIADO: Objection to the extent it 15:59:13
21 calls for speculation. 15:59:14

22 THE WITNESS: No. 15:59:16

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Transcript of Edward White

Conducted on February 2, 2022

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1	BY MR. ROTTENBORN:	15:59:17
FSPK, R, P, 2	Q You're aware he's been to detox, right?	15:59:17
IO, 3	MR. PRESIADO: Same objection.	15:59:21
VA, 4	THE WITNESS: I am not aware of his	15:59:22
AF 4	medical care, and I'm not aware of any alleged	15:59:25
5	drug -- drug issues.	15:59:30
6		
7	Q Were you aware of how much he spent on	15:59:31
FSPK, R, P 8	doctors who were supposed to help with his drug	15:59:35
IO, 9	addictions?	15:59:38
VA, 9		
AF 10	MR. PRESIADO: Objection; assumes facts	15:59:39
11	not in evidence, calls for speculation.	15:59:41
12	THE WITNESS: He has recurring medical	15:59:43
13	services by qualified physicians, and I do not	15:59:48
14	recall how much expenditures he has incurred for	15:59:51
15	the talent he has engaged.	15:59:53
16	Q You have no idea whether the physicians	15:59:55
R, IO 17	he's engaged are qualified. You're just saying	15:59:57
18	that, right?	16:00:00
19	A They're fully licensed and I would assume	16:00:01
20	that they have the qualifications to practice	16:00:05
21	medicine based upon their credentials.	16:00:08
R 22	Q You're not a doctor, right?	16:00:11

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1 A No, I'm not a doctor. 16:00:13

2 Q You're not qualified to opine on whether 16:00:15

3 or not a doctor is providing adequate medical 16:00:18

4 treatment or not, right? 16:00:20

5 A Why did you ask me the question, then? I 16:00:21

6 mean, I'm not sure where you're going with this. 16:00:24

7 He has medical care, as everyone does, he 16:00:26

8 satisfies those obligations, and I think I've 16:00:29

9 stated that in a responsive manner. 16:00:33

10 Q You're aware that he's spent hundreds of 16:00:37

11 thousands, if not millions of dollars on doctors 16:00:39

12 or medical treatment designed to help his drug 16:00:41

13 addictions, correct? 16:00:44

14 MR. PRESIADO: Objection; asked and 16:00:45

15 answered, assumes facts not in evidence, calls for 16:00:46

16 speculation. 16:00:50

17 THE WITNESS: I'm not aware of that. 16:00:50

18 Q Would your -- does your -- as part of the 16:00:52

19 services you provide, do you or your company make 16:00:58

20 payments to Mr. Depp's doctors? 16:01:03

21 A Yes. 16:01:05

22 Q Do you make payments relating to 16:01:08

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1	maintenance or damage to his properties?	16:01:11
2	A Yes.	16:01:13
3	Q Would you have records relating to how	16:01:20
4	much has been paid to certain doctors or to --	16:01:22
5	relating to maintenance on properties?	16:01:26
6	A The nature and the scope of his	16:01:29
7	disbursements are maintained by my office, and	16:01:34
8	that would include medical expenditures.	16:01:38
9	Q Before lunch -- and I don't know if you	16:01:41
10	did so or not -- but you offered to see if you	16:01:46
11	could determine who else was at the dinner that	16:01:49
12	that Mr. Depp had at your house with Adam Waldman.	16:01:52
13	Were you able to look at that?	16:01:58
14	A Counselor, I did inquire with two of my	16:02:00
15	colleagues, and I could not determine who attended	16:02:04
16	the meeting.	16:02:06
17	Q Now, you've become aware of Mr. Depp	16:02:07
18	appearing late on set for filming before, right?	16:02:13
19	MR. PRESIADO: Objection; calls for	16:02:17
20	speculation, lacks foundation, assumes facts not	16:02:18
21	in evidence.	16:02:21
22	THE WITNESS: No.	16:02:21

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Transcript of Edward White

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1	BY MR. ROTTENBORN:	16:02:21
2	Q You've never -- it's never been brought to	16:02:25
3	your attention that Mr. Depp appears late on set?	16:02:27
4	MR. PRESIADO: Objection; asked and	16:02:30
5	answered, assumes facts not in evidence, calls for	16:02:31
6	speculation.	16:02:33
7	THE WITNESS: Could you restate the	16:02:33
8	question, please.	16:02:38
9	Q Has it ever been brought to your attention	16:02:38
10	that Mr. Depp has appeared late on a movie set?	16:02:40
11	MR. PRESIADO: Objection; assumes facts	16:02:44
12	not in evidence.	16:02:45
13	THE WITNESS: Never to my knowledge has	16:02:45
14	anyone ever complained about his professional	16:02:48
15	services. All of us from time to time may be	16:02:51
16	early or late to a commitment, but I believe he's	16:02:54
17	carried out his responsibilities in a very	16:02:58
18	professional manner.	16:03:00
19	Q So if Disney or Warner Bros. or anyone had	16:03:01
20	complained about Mr. Depp's professionalism or his	16:03:06
21	timeliness, that would be a surprise to you?	16:03:09
22	MR. PRESIADO: Objection; compound,	16:03:12

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1 assumes facts not in evidence. 16:03:13

2 THE WITNESS: Yes; and it would not come 16:03:14

3 to me. In my capacity as his business manager, a 16:03:16

4 concern of that issue would not be addressed to 16:03:23

5 me. And to my knowledge, he's always performed in 16:03:25

6 an exemplary manner, and all of the companies that 16:03:30

7 have engaged him have enjoyed his performances and 16:03:32

8 enjoyed the economic benefits as a result of the 16:03:36

9 engagement. 16:03:38

10 BY MR. ROTTENBORN: 16:03:39

11 Q What's the basis for your testimony that 16:03:39

12 all the companies that have engaged him have 16:03:42

13 enjoyed his services? 16:03:44

14 A The economic reports that have been made 16:03:46

15 available to us by the public involving the 16:03:49

16 revenue generated from Pirates of the Caribbean, 16:03:55

17 from Fantastic Beasts, and other movies. He's had 16:04:00

18 an amazing career, and production companies have 16:04:04

19 been anxious to reengage him. 16:04:08

20 Q You've never spoken to anyone at a 16:04:10

21 production company about their satisfaction or 16:04:12

22 lack thereof of Mr. Depp's services, right? 16:04:16

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1 A I've never made individual inquiries, but 16:04:19
2 we have certainly seen the financial results of 16:04:25
3 his services. 16:04:28

4 Q And Mr. Depp's career -- I'm sorry. 16:04:29
5 Mr. Depp's -- strike that. 16:04:35

6 Do you know how much money Mr. Depp has 16:04:41
7 spent on alcohol and drugs in the past ten years? 16:04:51

8 MR. PRESIADO: Objection; asked and 16:04:53
9 answered, vague and ambiguous. 16:04:56

10 THE WITNESS: I do not -- I do not know 16:04:59
11 that Mr. Depp has used illegal substances and I do 16:05:01
12 not know the amount of alcohol that's been 16:05:05
13 purchased. As I shared with you earlier, the wine 16:05:09
14 cost after his marital dissolve with Ms. Heard 16:05:15
15 became literally zero. The cost of wine after the 16:05:20
16 marital dissolve was de minimis. 16:05:25

17 Q And how do you know that? Do you get 16:05:28
18 receipts from Mr. Depp's individual purchases? 16:05:38

19 A What -- the reason I know that is I know 16:05:41
20 the vendors that he acquired alcohol from, and I 16:05:44
21 know what the costs were prior to the marital 16:05:48
22 dissolve, and what the costs have been thereafter. 16:05:51

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Transcript of Edward White

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1 Q You don't know who drank wine that he 16:05:54
2 ordered while he was married, right? 16:05:57

3 A I was not there to participate in the 16:05:59
4 consumption of it. I can just tell you that after 16:06:03
5 the marital dissolve, the cost of the wine became 16:06:07
6 de minimis. 16:06:09

7 Q Who is Tracey Jacobs? 16:06:10

8 A She is an agent with UTA, and an executive 16:06:17
9 with the company as well. I believe she's on the 16:06:24
10 board. 16:06:26

11 Q Formerly Mr. Depp's agent, right? 16:06:26
FSPK

12 A Yes. 16:06:30

13 Q Till -- till sometime in 2016. Does that 16:06:30
14 sound about right? 16:06:38

15 A I do not recall the date. 16:06:39

16 Q Now, you've -- do you and Ms. Jacobs share 16:06:40
17 other clients other than Mr. Depp? I don't want 16:06:49
18 to know who they are. 16:06:54

19 MR. PRESIADO: One caution not to mention 16:06:54
20 the names of any clients. But you can answer the 16:06:56
21 question if, in fact, there are any. 16:06:59

22 THE WITNESS: Individually with Tracey, I 16:07:03

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1	would believe the answer is no. With her company,	16:07:05
2	I believe the answer is yes.	16:07:08
3	BY MR. ROTTENBORN:	16:07:09
4	Q And you communicated with Tracey about	16:07:09
5	Mr. Depp, right?	16:07:15
6	A We had conversations, that's correct.	16:07:18
7	Q Over the phone?	16:07:20
8	A Yes.	16:07:23
9	Q Over text?	16:07:24
10	A Pardon me?	16:07:26
11	Q Over text message?	16:07:28
12	A I don't recall text messages. I do recall	16:07:30
13	going to her office and having a meeting, or	16:07:33
14	multiple meetings, and I do recall telephone	16:07:36
15	conversations.	16:07:40
16	MR. ROTTENBORN: Let's -- please pull up	16:07:42
17	the document labeled Edward White and Tracey	16:07:44
18	Jacobs text messages, please.	16:07:52
19	AV TECHNICIAN: Stand by.	16:07:58
20	(Exhibit 6, Text messages between White	16:08:12
21	and Jacobs, Bates Nos. DEPP00019240 through	16:08:12
22	DEPP00019253, and UTA 000157 through UTA 000170	16:08:12

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Transcript of Edward White
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1	000170, was marked for identification and is	16:08:12
2	attached to the transcript.)	16:08:22
3	AV TECHNICIAN: Exhibit 6.	16:08:22
4	BY MR. ROTTENBORN:	16:08:24
5	Q And, Mr. White, you can take as long as	16:08:24
6	you want to scroll through this, but my first	16:08:32
7	question is just going to be: Are these text	16:08:34
8	messages between you and Tracey Jacobs?	16:08:37
9	MR. PRESIADO: Ben, can I see the Bates	16:08:41
10	stamp on this.	16:08:44
11	MR. ROTTENBORN: Yeah. It's kind of cut	16:08:46
12	off at the bottom. I think it's DEPP 19240	16:08:47
13	through 19253.	16:08:51
14	MR. PRESIADO: These were produced by UTA	16:08:59
15	per the Bates stamp; is that your understanding?	16:09:02
16	MR. ROTTENBORN: No. They were -- I think	16:09:05
17	they were produced by -- well, I'm not sure	16:09:09
18	because they are -- may have been produced by UTA	16:09:12
19	but also produced by Depp. My guess is they were	16:09:17
20	produced by UTA as part of another proceeding, but	16:09:21
21	I don't know.	16:09:26
22	MR. PRESIADO: And, I'm sorry, your	16:09:34

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Transcript of Edward White

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1 question, Ben? 16:09:35

2 BY MR. ROTTENBORN: 16:09:36

3 Q My question is just: Are these text 16:09:36

4 messages between you and Tracey Jacobs? 16:09:39

5 A They appear to be, but I'm not absolutely 16:09:40

6 certain. 16:09:45

7 Q Do you have any reason to doubt that these 16:09:46

8 are text messages between you and Tracey Jacobs? 16:09:50

9 A Well, we're going through them so quickly 16:09:52

10 it's hard for me to read them all. But I'd have 16:09:57

11 to go through each one of these and read them to 16:10:01

12 be responsive. I mean, my name appears. 16:10:05

13 Q Right. And I'm going to direct your 16:10:08

14 attention to some of them, and obviously go 16:10:10

15 through whatever you need to, but my question was 16:10:12

16 just: Do you have any reason to believe that 16:10:14

17 these are not text messages between you and Tracey 16:10:17

18 Jacobs -- 16:10:17

19 MR. PRESIADO: Asked and answered. 16:10:17

20 Q -- her name appears and your name appears? 16:10:23

21 MR. PRESIADO: Ben, he indicated he'd have 16:10:26

22 to go through all of them. So maybe if you just 16:10:29

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1 go to the ones you want to ask him about and then 16:10:30
2 you can ask him that question with respect to that 16:10:32
3 particular exchange, unless you want him to take 16:10:34
4 the time to go through all of these. 16:10:35

5 MR. ROTTENBORN: Yeah, that's enough 16:10:37
6 speaking, Leo. I told him we can go -- he can go 16:10:38
7 through all of them if he wants. 16:10:41

8 BY MR. ROTTENBORN: 16:10:41

9 Q But my question was simply: Do you have 16:10:43
10 any reason -- take as much time as you need, 16:10:45
11 Mr. White, I've got all day. But do you have any 16:10:47
12 reason to believe that these are not text messages 16:10:50
13 between you and Ms. Jacobs? 16:10:52

14 A Do you want me to go through every text 16:10:54
15 and read it and then respond to your inquiry? 16:10:57

16 Q If you feel like you need to do that to 16:11:00
17 answer my question, I -- it doesn't seem like you 16:11:02
18 would, but... 16:11:05

19 A Well, unless I read each individual text I 16:11:06
20 wouldn't be able to respond. But my name, Edward 16:11:09
21 White, is there. It may well be that it is text 16:11:15
22 messages between us. What I think would be 16:11:19

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1	productive is for you to ask your questions and	16:11:23
2	I'll try to be responsive to them. But I can't	16:11:24
3	absolutely assure you that every one of these is,	16:11:27
4	in fact, an exchange between Tracey and myself.	16:11:29
5	Q Sure. Let's do this: Let's go to the	16:11:32
6	third page of the document, please.	16:11:35
7	MR. PRESIADO: We're there.	16:11:38
8	Q Up at the top, the second text down	16:11:41
9	Ms. Jacobs writes: So what is Fahar getting him	16:11:52
10	other than the planes and trip to Spain with the	16:11:56
11	price?	16:12:00
12	And you write: Nothing to date.	16:12:00
13	Who is Fahar?	16:12:02
14	A I don't recall a great deal of information	16:12:03
15	about Fahar, but it's a relationship that Mr. Depp	16:12:12
16	had prior to my association with Mr. Depp.	16:12:14
17	Q You -- do you remember -- do you know	16:12:19
18	anything about who Fahar was?	16:12:24
19	A No, I -- I don't recall the nature of his	16:12:26
20	business activities, where he resides. I have	16:12:31
21	very little information about Fahar.	16:12:34
22	Q Did you have -- if you go to the next page	16:12:37

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1	underneath those two pictures --	16:12:41
2	MR. ROTTENBORN: Can you scroll down,	16:12:44
3	please.	16:12:44
4	Q -- it looks like you write: Current	16:12:45
5	photos of Johnny from Fahar. He looks healthier	16:12:48
6	and rested. Maybe Spain was the perfect hiatus.	16:12:51
7	Do you agree that it appears that you had	16:12:56
8	communications with Fahar about Mr. Depp?	16:12:58
9	A Yes, I do recall conversing with him. I	16:13:01
10	just don't recall the time or the nature or the	16:13:05
11	scope of the conversations.	16:13:08
12	Q And I'm just wondering: Who is he, or	16:13:09
13	she?	16:13:12
14	A It's a man, in response to your inquiry.	16:13:13
15	Candidly, I do not know that much about Fahar in	16:13:17
16	terms of his business activities, who he's	16:13:21
17	affiliated with, what the nature and scope of the	16:13:23
18	services he provides. My involvement with him is	16:13:26
19	limited. And, once again, I'm unfamiliar with his	16:13:29
20	background or his current status.	16:13:33
21	Q Have you ever met him in person?	16:13:36
22	A Yes.	16:13:38

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1 Q When? 16:13:39

2 A I do not recall, but I have met him in 16:13:41

3 person. 16:13:45

4 Q With Mr. Depp? 16:13:45

5 A Yes. I believe they may have well been 16:13:46

6 together when I met with him. 16:13:53

7 Q And where was that? 16:13:54

8 A I do not recall, but it may well be at 16:13:55

9 Mr. Depp's offices. 16:14:00

10 Q Do you recall when? 16:14:01

11 A No. 16:14:06

12 MR. ROTTENBORN: If you can go to the 16:14:11

13 document labeled 19246, please. 16:14:12

14 Q Do you see the second text down where 16:14:37

15 Ms. Jacobs writes: Thanks. I got a call from 16:14:40

16 Disney last week saying he showed up 5 hours late 16:14:44

17 for adr work in London for Pirates 5. I really 16:14:48

18 need to speak to him before he starts work on his 16:14:52

19 next project in LA? 16:14:55

20 Do you see that? 16:14:56

21 A Yes. 16:14:58

H 22 Q You'd agree that that was Ms. Jacobs 16:14:59

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1	informing you that Disney had told her that he had	16:15:01
H 2	showed up five hours late for work on Pirates 5,	16:15:04
3	right?	16:15:07
4	MR. PRESIADO: Objection; calls for	16:15:08
5	hearsay.	16:15:09
6	THE WITNESS: The answer -- the text	16:15:09
7	speaks for itself. But as you know, people can	16:15:14
8	come to work late for a wide variety of reasons.	16:15:16
9	My employees sometimes come late because they're	16:15:20
10	ill or because they have medical appointments. I	16:15:24
11	don't know the reason why he may have come late	16:15:25
12	because I was not involved.	16:15:29
13	Q You knew that Johnny arrived -- frequently	16:15:31
FSPK AA 14	arrived late on sets or for movie work, right?	16:15:34
15	MR. PRESIADO: Objection; asked and	16:15:38
16	answered. You already covered this. Calls for	16:15:39
17	speculation, lacks foundation.	16:15:42
18	THE WITNESS: No, I do not know that he	16:15:43
19	frequently arrived late. And I don't know the	16:15:45
20	circumstances and I'm not capable of making any	16:15:47
21	comment in that regard.	16:15:50
AR 22	Q Because if you don't know the	16:15:51

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1	circumstances of a particular set of facts, then	16:15:54
AR 2	you shouldn't be making comments on them, right?	16:15:57
3	MR. PRESIADO: Objection; argumentative.	16:16:00
4	THE WITNESS: I'm not sure what you are	16:16:01
5	referring to.	16:16:02
6	Q It's just a question.	16:16:03
7	A Could you state it again, please.	16:16:08
8	Q You shouldn't be speculating on things	16:16:09
9	that you don't have personal knowledge of. You'd	16:16:13
10	agree with that, right?	16:16:16
AR 11	MR. PRESIADO: Objection; context.	16:16:17
12	THE WITNESS: I -- I'm not speculating on	16:16:20
13	any of my comments. They're offered to you in	16:16:22
14	good faith.	16:16:26
FSPK 15	Q You were aware that Ms. Jacobs had a tough	16:16:28
R 16	time reaching Johnny or getting Johnny to be	16:16:38
H 17	responsive, correct?	16:16:40
VA 18	MR. PRESIADO: Objection; asked and	16:16:43
AA 19	answered, assumes facts not in evidence, calls for	16:16:45
20	speculation, lacks foundation, and hearsay.	16:16:48
21	THE WITNESS: I do not know the	16:16:52
22	circumstances as to when she made inquiries and	16:16:54

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1 how often she actually conversed with him. 16:16:59

2 BY MR. ROTTENBORN: 16:17:05

3 Q But you knew that she had difficulty 16:17:05

FSPK 4 reaching him when she needed a response from him 16:17:09

H 5 about, for example, roles and potential 16:17:12

VA 6 forthcoming movies, right? 16:17:17

7 MR. PRESIADO: Objection; asked and 16:17:19

8 answered, spec- -- calls for speculation, assumes 16:17:20

9 facts not in evidence, calls for hearsay, lack of 16:17:24

10 personal knowledge. 16:17:27

11 THE WITNESS: I do not want to speculate, 16:17:31

12 but if she had difficulty reaching him, it may 16:17:33

13 have been during a transition period to new 16:17:35

14 professional services. 16:17:42

15 Q But you wouldn't know if that's the reason 16:17:43

16 that she had difficulty reaching him because you 16:17:45

17 wouldn't want to speculate, right? 16:17:47

18 A That is correct. That's why I qualified 16:17:49

19 your comment. 16:17:53

20 Q Now, at some point you -- you became aware 16:17:53

21 that he had fired Tracey Jacobs, right? 16:17:56

22 A Yes. 16:17:58

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1	Q And to your knowledge, did he ever tell	16:18:00
2	you why he had fired her?	16:18:03
3	A I do not recall.	16:18:04
4	Q You said right before lunch that you had	16:18:07
5	never met Amber, correct?	16:18:18
6	A To the best of my recollection I've never	16:18:21
7	met the lady.	16:18:25
8	Q Did Mr. Depp -- has he ever spoken to you	16:18:26
9	about his marriage or relationship with Ms. Heard?	16:18:36
10	A Yes.	16:18:40
11	Q What has he said?	16:18:44
12	A I -- I do not recall the circumstances. I	16:18:47
13	know that they were going through a marital	16:18:52
14	dissolve and decided to pursue life independent of	16:18:55
15	one another. But I do not recall specific	16:18:58
16	comments Mr. Depp made to me about Ms. Heard.	16:19:01
17	Q You had a meeting with Mr. Depp that --	16:19:04
18	that coincides with one of the significant dates	16:19:11
19	in this case, which was April 21, 2016. Do you	16:19:15
20	recall that meeting?	16:19:24
21	A Can you share with me the -- a little more	16:19:24
22	information about that date, and it may refresh my	16:19:31

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1	recollection.	16:19:35
2	Q Sure.	16:19:36
3	MR. ROTTENBORN: Let's pull up the exhibit	16:19:44
4	entitled First Witness Statement of Edward White.	16:19:45
5	(Exhibit 7, First Witness Statement of	16:20:10
6	Edward White, was marked for identification and is	16:20:10
7	attached to the transcript.)	16:20:10
8	AV TECHNICIAN: Exhibit 7.	16:20:10
9	Q This is just a short document, Mr. White.	16:20:15
10	Why don't you go ahead and read that and let me	16:20:22
11	know when you're done, please.	16:20:24
12	A Certainly.	16:20:26
13	THE WITNESS: Can you scroll up a little	16:20:40
14	more. It needs to scroll up. Yeah.	16:20:41
15	A I've now read my statement.	16:21:15
16	Q Does that refresh your recollection about	16:21:16
17	a meeting that you had with Mr. Depp on April 21,	16:21:22
18	2016?	16:21:26
19	A Yes.	16:21:26
20	Q So with that --	16:21:32
21	MR. ROTTENBORN: You can -- you can pull	16:21:36
22	the document off for now.	16:21:38

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Transcript of Edward White

Conducted on February 2, 2022

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1	BY MR. ROTTENBORN:	16:21:38
2	Q What do you recall about the nature of	16:21:41
3	that -- that meeting? That was a terrible	16:21:43
4	question. Tell me -- tell me what you recall	16:21:48
5	about that meeting.	16:21:50
6	A I recall that we had a discussion about	16:21:53
7	his financial affairs and a necessity to formulate	16:21:55
8	a revised business strategy and plan. And I	16:22:00
9	recall that he was pleased that there was a	16:22:05
10	reconstruction plan that we had formulated and	16:22:09
11	that he had an opportunity to resolve the very	16:22:14
12	serious financial issues to which he was	16:22:16
13	confronting.	16:22:18
14	Q This wasn't the first meeting that you had	16:22:20
15	with Mr. Depp, right?	16:22:25
16	A No, it was not the first meeting.	16:22:26
17	Q You were delivering some fairly dire	16:22:30
18	financial news to Mr. Depp at this meeting in	16:22:36
19	April 2016, right?	16:22:39
20	A I would rephrase the word "dire." I	16:22:40
21	was -- I delivered to him factual information	16:22:44
22	about the state of his financial affairs. I also	16:22:47

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Transcript of Edward White

Conducted on February 2, 2022

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1	shared with him a plan to -- as I shared with you	16:22:50
2	earlier, to monetize assets, to reduce	16:22:54
3	expenditures, and to increase revenue, which, when	16:22:59
4	fully implemented, would resolve these issues in a	16:23:02
5	prudent and responsible manner. And he was very	16:23:08
6	pleased to hear that information about the	16:23:09
7	turnaround plan and how he can solve the problems	16:23:11
8	he was confronting.	16:23:14
9	Q What factual information did you reveal	16:23:16
10	about the state of his financial affairs at this	16:23:19
11	meeting?	16:23:21
12	A I don't recall the specific data, but bank	16:23:22
13	obligations and tax liabilities, specific assets	16:23:25
14	that could be monetized, ways to reduce	16:23:30
15	expenditures, how to work with agents and try to	16:23:34
16	enhance revenue; those were the type of issues	16:23:37
17	that we discussed.	16:23:40
18	Q Were you trying to convey the message that	16:23:41
19	he was running out of money and he needed to clean	16:23:50
20	up his finances?	16:23:55
21	A I conveyed to him that his assets in total	16:23:56
22	exceeded his liabilities. I conveyed to him that	16:24:01

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Transcript of Edward White

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1 his short-term resources -- I'll call those 16:24:04
2 assets -- were less than his short-term 16:24:07
3 obligations, and that we had to have a plan that 16:24:10
4 would satisfy vendor responsibilities in a timely, 16:24:13
5 respectful manner. 16:24:17
6 Q Okay. I -- thank you. I think you may 16:24:18
7 have misspoken, but maybe not. I just want to -- 16:24:21
8 the first part of your answer I believe you said, 16:24:23
9 I revealed to him that his assets exceeded 16:24:25
10 liabilities. Did you mean to say that his 16:24:29
11 liabilities exceeded his assets? 16:24:31
12 A No. There's two types of assets. I'll 16:24:33
13 call it total assets. And I believe that his 16:24:36
14 total assets did exceed his liabilities and, 16:24:41
15 therefore, it cost his net worth. Set that aside. 16:24:44
16 What I was referring to is that his short-term 16:24:47
17 assets, assets that could be monetized in the near 16:24:50
18 future, were less than his short-term liabilities, 16:24:54
19 and that a plan had to be formulated to reverse 16:24:57
20 that circumstance and satisfy his obligation in a 16:25:00
21 timely and professional manner. 16:25:02
22 Q And the plan that you revealed to him that 16:25:05

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Transcript of Edward White

Conducted on February 2, 2022

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1	evening included things like selling some of his	16:25:08
2	properties?	16:25:12
3	A Yes. That's what I meant by "monetizing	16:25:13
4	assets"; taking an asset and converting it to cash	16:25:15
5	and using the cash to satisfy obligations, and	16:25:19
6	simultaneously reducing his monthly expenditures	16:25:22
7	because he no longer has those assets that need to	16:25:25
8	be serviced.	16:25:29
9	Q What type of expenditures do you recall	16:25:30
10	telling him that night he needed to reduce?	16:25:33
11	A Are you talking about the disposition of	16:25:36
12	assets or recurring expenditures?	16:25:39
13	Q Recurring expenditures.	16:25:43
14	A Okay. Bank obligations by satisfying --	16:25:45
15	if one can sell an asset and pay off the bank	16:25:49
16	obligation, he would no longer require the service	16:25:53
17	of that obligation. In addition to that, ongoing	16:25:56
18	expenses with the repair, maintenance, insurance,	16:26:00
19	and other obligations associated with the property	16:26:06
20	would be eliminated. So that would be an example	16:26:08
21	of -- by monetizing an asset, you not only serve	16:26:11
22	obligations, but you reduce monthly expenditures.	16:26:15

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Transcript of Edward White

Conducted on February 2, 2022

149

MS 1 Q So you were -- in layman's terms you were 16:26:18
AF 2 telling him he was spending too much money. 16:26:20
AR

3 MR. PRESIADO: Objection; misstates 16:26:23
4 testimony, assumes facts not in evidence, 16:26:25
5 argumentative. 16:26:27

6 THE WITNESS: In my terms I was informing 16:26:28
7 him that he needed to restructure his financial 16:26:31
8 affairs in a way to eliminate the obligation to -- 16:26:35
9 in order to satisfy the obligations he was 16:26:41
10 encountering. And by restructuring his affairs, 16:26:44
11 that he could have financial solvency. And he 16:26:48
12 seemed to be quite pleased about the fact that 16:26:51
13 while there was a problem, there was a solution. 16:26:56

MS 14 Q And so at the time, at least in the short 16:26:57
VA 15 term, he was insolvent. Short-term assets versus 16:27:00
16 short-term liabilities, he was insolvent. 16:27:04

17 MR. PRESIADO: Objection; vague and 16:27:07
18 ambiguous, misstates testimony. 16:27:09

19 You can answer. 16:27:11

20 THE WITNESS: "Insolvency" is a term that 16:27:11
21 needs to be defined. What I'd like to say to you 16:27:14
22 is he did not have the ability to satisfy his 16:27:19

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Transcript of Edward White
Conducted on February 2, 2022

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1	short-term obligations with his short-term	16:27:21
2	resources.	16:27:25
3	Q Did you also tell him at that meeting that	16:27:26
4	his taxes hadn't been paid in years?	16:27:34
5	A I don't recall all the specifics I shared	16:27:38
6	with him. But it's very conceivable I would have	16:27:41
7	shared with him that there were delinquent tax	16:27:43
8	liabilities that needed to be satisfied.	16:27:48
9	Q Who is Richard -- or who was present at	16:27:50
10	that meeting?	16:27:54
11	A I -- I do not recall who was present, but	16:27:54
12	I think in my declaration I enumerated the people	16:27:59
13	that you just had me to read --	16:28:05
14	Q Yeah. Richard Smith, who's that?	16:28:06
15	A Richard Smith was a senior bank officer at	16:28:08
16	Bank of California and he was one of the resources	16:28:12
17	I was using to secure financing in order to	16:28:15
18	address these obligations.	16:28:18
19	Q And then your partners, Troy Schmidt and	16:28:19
20	Lawrence Leavitt, are they -- do they work with	16:28:24
21	you?	16:28:27
22	A Yes, they do. They were partners at that	16:28:27

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Transcript of Edward White
Conducted on February 2, 2022

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1 time and they are with the -- my firm, our firm, 16:28:29
2 at this date. 16:28:33
3 Q Okay. So there were three of you from 16:28:34
4 your firm there. And then it says Mr. Fahar 16:28:36
5 Faizaan. 16:28:40
6 A Yes. 16:28:40
7 Q Do you recall him being there that 16:28:40
8 evening? 16:28:42
9 A Now that I'm refreshed with this 16:28:42
10 declaration, the answer's yes. In fact, earlier I 16:28:46
11 think I shared with you that I may have met him at 16:28:52
12 Mr. Depp's offices. 16:28:53
13 Q Right, right. Do you recall -- okay. And 16:28:54
14 then Christie Dembrowski, Mr. Depp's sister, 16:28:56
15 right? 16:28:59
16 A Yes. 16:29:00
17 Q Was Mr. Depp -- well, did anyone at the 16:29:00
18 meeting have any alcohol that you saw? 16:29:15
19 A I do not recall. 16:29:16
20 Q Possible? 16:29:19
21 MR. PRESIADO: Objection; asked and 16:29:22
22 answered. 16:29:23

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Transcript of Edward White

Conducted on February 2, 2022

152

1 THE WITNESS: I do not recall any alcohol 16:29:24
2 at the meeting. 16:29:25
3 BY MR. ROTTENBORN: 16:29:26
4 Q Did anyone, to your recollection, use any 16:29:26
5 drugs at the meeting? 16:29:34
6 A No. 16:29:35
7 Q Now, when the meeting -- when the meeting 16:29:35
8 was over, you didn't leave with Mr. Depp, right? 16:29:47
9 A I did not leave with Mr. Depp. 16:29:51
10 Q So you have no idea where he went when the 16:29:54
11 meeting was over, correct? 16:29:57
12 A I was not aware of where he would go. It 16:29:58
13 was my understanding that he was going to go home. 16:30:03
14 Q Okay. But you don't know or have any 16:30:06
15 personal knowledge of whether he actually did go 16:30:10
16 home or not, right? 16:30:12
17 A I did not go with him, therefore, I cannot 16:30:13
18 tell you exactly where he went. It was my 16:30:17
19 understanding that he was going to go home. 16:30:20
20 Q And to the extent that other events of 16:30:23
21 that evening bear on this case, you don't have any 16:30:26
22 personal knowledge of any of them other than what 16:30:29

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Transcript of Edward White
Conducted on February 2, 2022

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1 transpired at the meeting that you attended, 16:30:32

2 correct? 16:30:35

3 MR. PRESIADO: Objection; vague and 16:30:36

4 ambiguous, overbroad. 16:30:37

5 THE WITNESS: I was not at his home, 16:30:41

6 therefore, I cannot make any comments about what 16:30:46

7 transpired there. I can tell you that when he 16:30:51

8 left me he was gratified, he was coherent, he was 16:30:53

9 thoughtful, and respectful. 16:30:59

10 Q Was he in a good mood? 16:31:00

11 A I would say considering the information I 16:31:07

12 shared with him, he took it in a very positive 16:31:09

13 manner. And I think he realized there was a 16:31:12

14 serious problem, but he understood there was a 16:31:16

15 solution, and he was gratified by the fact that we 16:31:18

16 had a forward-looking plan to resolve these 16:31:22

17 important issues. 16:31:24

18 Q Now, at some point you learned that Johnny 16:31:25

19 and Amber were getting divorced, right? 16:31:44

20 A Yes. 16:31:46

21 Q And that was later in the summer of 2016, 16:31:46

22 give or take? 16:31:50

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Transcript of Edward White

Conducted on February 2, 2022

154

1	A I do not recall the date, but I clearly	16:31:51
2	learned at a later date that they were dissolving	16:31:53
3	their marriage.	16:31:56
4	Q Now, you're not a -- you're not an	16:31:57
5	attorney, right?	16:32:00
6	A I am not an attorney.	16:32:01
7	Q Okay. And you're not a -- you're not an	16:32:04
8	expert on California divorce law, right?	16:32:06
9	A I am not an expert on California diverse	16:32:08
10	law -- divorce law.	16:32:12
11	Q Okay. Not an expert on marital property	16:32:14
12	division in California?	16:32:16
13	A I'm not an expert on any of those matters,	16:32:17
14	but I have participated with my clients over many	16:32:21
15	decades who've gone through a marital dissolve and	16:32:24
16	addressing issues such as property settlement,	16:32:30
17	spousal rights, child custody, and other issues at	16:32:34
18	the time. But I'll reaffirm, I'm not an attorney,	16:32:37
19	I'm not an expert regarding these matters.	16:32:41
20	Q At some point you became familiar with	16:32:43
21	what Ms. Heard planned to do with proceeds that	16:33:03
22	she received from Mr. Depp in the divorce, right?	16:33:08

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Transcript of Edward White
Conducted on February 2, 2022

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1	A Yes.	16:33:11
2	Q And that was to -- to donate money to two	16:33:12
3	different charities, the ACLU and the Children's	16:33:22
4	Hospital in LA, right?	16:33:26
5	A Yes.	16:33:28
6	Q And, in fact, you wrote checks to those	16:33:28
7	two organizations that were part of Mr. Depp's	16:33:34
8	divorce payment to Ms. Heard, but just sent	16:33:40
9	directly to those organizations, right?	16:33:43
10	A Yes.	16:33:44
11	Q And it was your understanding that those	16:33:46
12	donations would be made over a period of time,	16:33:53
13	right?	16:33:55
14	A It was not my understanding that they be	16:33:56
15	made over a period of time. It was my	16:34:00
16	understanding they'd be made concurrently with the	16:34:02
17	payments that Mr. Depp made to her.	16:34:05
18	Q But the payment that -- the payments that	16:34:08
19	you made were not the full amount, right?	16:34:11
20	A The payments that I made were the full	16:34:13
21	amounts. They were paid periodically. And they	16:34:16
22	were honored in a timely -- in fact, in some	16:34:20

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Transcript of Edward White

Conducted on February 2, 2022

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1 instances ahead of the scheduled agreement. 16:34:23

0 2 Q Yeah, and I'm sorry, I think I asked an 16:34:26

3 unfair question. 16:34:29

4 The payments that you made to ACLU and the 16:34:30

5 Children's Hospital of LA weren't the full amount 16:34:34

6 of the divorce settlement, right? 16:34:37

7 A That is correct. 16:34:39

8 Q They were the first installment, right? 16:34:39

9 A Yes. 16:34:42

10 Q Have you, over the -- and I don't want to 16:34:43

11 know specific clients or anything like that, but 16:34:47

12 have you, over the course of your work, helped 16:34:50

13 clients set up pledged contributions to charities? 16:34:54

14 A I've helped my clients address their 16:35:00

15 philanthropic objectives on multiple fronts. In 16:35:06

16 some instances they give a very substantial amount 16:35:11

17 of money in one payment; sometimes it is over a 16:35:13

18 period of time, if that's responsive to your 16:35:16

19 question. 16:35:18

0 20 Q Yeah. No, this is. I appreciate that. 16:35:18

21 And a gift that's over a period of time 16:35:23

22 would -- is a -- you'd make a pledge and then 16:35:25

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Transcript of Edward White
Conducted on February 2, 2022

157

1 you'd make installments on that -- installment 16:35:26
2 payments on that pledge, right? 16:35:30
3 A Not quite. When it's installments, to use 16:35:31
4 your terminology, there are specified dates that 16:35:35
5 installments will be paid by in accordance with 16:35:39
6 pledges that are made to the charities. So it's 16:35:43
7 not an open-end situation; it's a specified 16:35:48
8 payment plan with specified amounts and specified 16:35:52
9 dates. 16:35:56
10 Q Right. Understood. And if I -- and if 16:35:56
11 I'm using terminology that is in your view the 16:35:59
12 wrong terminology, then please correct me. But 16:36:01
13 the charitable donations aren't always paid all at 16:36:06
14 once, right? 16:36:10
15 A That's correct. When you're not -- when 16:36:10
16 they're pledged and they're not paid at one time 16:36:16
17 there is an understanding between the not-for- 16:36:19
18 profit organization and the party making the 16:36:22
19 contribution as to when the payments will be made 16:36:23
20 and the amount of such payments. 16:36:26
21 MR. ROTTENBORN: Can you please pull up 16:36:31
22 the document entitled CHLA Pledge Letter. 16:36:32

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Transcript of Edward White

Conducted on February 2, 2022

158

1 AV TECHNICIAN: Please stand by. 16:36:54

2 (Exhibit 8, 8/24/16 letter, Bates No. 16:37:21

3 ALH_00010366, was marked for identification and is 16:37:21

4 attached to the transcript.) 16:37:22

5 AV TECHNICIAN: Exhibit 8. 16:37:22

6 MR. ROTTENBORN: Thank you. 16:37:23

7 BY MR. ROTTENBORN: 16:37:27

8 Q And, Mr. White, my -- take as much time as 16:37:27

9 you need to read this, but my question is just: 16:37:33

10 Is this a letter that you sent to Children's 16:37:37

11 Hospital Los Angeles with that initial hundred- 16:37:41

12 thousand-dollar payment? 16:37:45

13 A Yes. 16:37:48

14 Q And that's your signature on the bottom? 16:37:49

15 A Yes. 16:37:52

16 MR. ROTTENBORN: Okay. You can take that 16:37:56

17 away. That's all I have. Thank you. 16:37:57

18 Can you please pull up the -- the document 16:38:18

19 called Second Witness Statement of Edward White. 16:38:24

20 (Exhibit 9, Second Witness Statement of 16:38:44

21 Edward White, was marked for identification and is 16:38:44

22 attached to the transcript.) 16:38:44

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Transcript of Edward White
Conducted on February 2, 2022

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1	AV TECHNICIAN: Exhibit 9.	16:38:44
2	BY MR. ROTTENBORN:	16:38:46
3	Q What is this document, Mr. White?	16:38:46
4	A Second Witness Statement of Edward White.	16:38:55
5	That's the title.	16:39:03
6	Q Okay. And is this a witness statement	16:39:04
7	that you made as part of Johnny's case in the	16:39:08
8	U.K.?	16:39:12
9	THE WITNESS: Can you scroll down and let	16:39:14
10	me read the balance of this statement, please.	16:39:15
11	MR. ROTTENBORN: Yeah. That's	16:39:18
12	appropriate.	16:39:19
13	THE WITNESS: Go a little more, please. I	16:39:29
14	am the senior partner. Okay, fine.	16:39:32
15	Can you go down so I can read a little	16:39:33
16	more.	16:39:36
17	Okay. Number 5, please.	16:39:54
18	Okay. Number 7.	16:40:24
19	Q Just let me know when you've had a chance	16:41:15
20	to look at it.	16:41:17
21	A I have now read it.	16:41:18
22	Q Okay. So this was a witness statement	16:41:19

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Transcript of Edward White

Conducted on February 2, 2022

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1	that you -- that you made in the U.K. litigation?	16:41:21
2	A Yes.	16:41:23
3	Q Now, you don't -- I don't -- and I just	16:41:39
4	want to get the facts as you recall them, and I'm	16:41:44
5	just showing you this to -- well, I just want to	16:41:47
6	get the facts as you recall them.	16:41:55
7	You don't know what contracts Mr. Depp	16:41:56
8	entered into during the marriage with Ms. Heard	16:42:04
9	that might have brought him revenue in the future,	16:42:08
10	right?	16:42:11
11	A Would you repeat your question, please. I	16:42:11
12	didn't understand.	16:42:14
13	Q Sure. You -- in this document you talk	16:42:15
14	about money that came in during the marriage --	16:42:18
15	A Correct.	16:42:22
16	Q -- and how the liabilities exceeded the	16:42:23
17	revenue, right?	16:42:25
18	A Correct.	16:42:25
19	Q Or at least Mr. Depp's revenue, right?	16:42:26
20	A Correct.	16:42:29
21	Q You're not aware and you're not -- you	16:42:29
22	don't have any personal knowledge on what	16:42:35

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Transcript of Edward White
Conducted on February 2, 2022

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1 contracts Mr. Depp may have signed during the 16:42:38
2 marriage that would have brought revenue in after 16:42:40
3 the marriage ended, right? 16:42:42

4 A I do not recall what contracts he may have 16:42:44
5 initiated during the period of the marriage, if 16:42:50
6 that's your question. 16:42:52

7 Q Right. And you -- you're not -- you don't 16:42:53
8 know to what degree -- because you're not an 16:42:59
9 expert in California divorce law, to what degree 16:43:04
10 Ms. Heard would have been entitled to continuing 16:43:06
11 payments on contracts that Mr. Depp entered into 16:43:10
12 during the marriage, right? 16:43:14

13 A You're correct, I'm not an expert on 16:43:15
14 matters of this type. 16:43:19

15 MR. PRESIADO: And I would interpose an 16:43:20
16 objection; assumes facts not in evidence. 16:43:22

17 Q You're not taking a -- you're not 16:43:23
18 expressing the position that somehow a decrease in 16:43:27
19 net worth during a marriage would mean that the 16:43:30

20 lower-earning spouse never got anything as part of 16:43:34
21 a divorce settlement, right? 16:43:37

22 A What I'm expressing is what the statement 16:43:41

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Transcript of Edward White

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1	says, which is: When you do a fluctuation	16:43:44
2	analysis on the liabilities of Mr. Depp at the	16:43:47
3	date of the marriage and the liabilities at the	16:43:51
4	date of their marital dissolve, that there was a	16:43:54
5	substantial increase in the liabilities, but no	16:43:58
6	material change in the assets.	16:44:02
7	Q Right. And you're not -- because you're	16:44:05
8	not an expert in California divorce law, you're	16:44:07
9	not expressing an opinion or any personal	16:44:10
10	knowledge on whether an increase in liabilities	16:44:13
11	without an accompanying increase in assets during	16:44:17
12	a marriage would mean that the lower-earning	16:44:19
13	spouse doesn't get anything as part of the	16:44:22
14	divorce, right?	16:44:24
15	A I didn't say that they would get nothing.	16:44:25
16	I think what my experience has been in	16:44:28
17	participating in numerous divorce proceedings is	16:44:34
18	that there is an evaluation of the assets and	16:44:39
19	liabilities at the date of the marriage, an	16:44:43
20	evaluation of the assets and liabilities at the	16:44:46
21	date of the dissolve, and that economic reality is	16:44:48
22	taken into account in arriving at what one spouse	16:44:51

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1 may receive. That's based upon my experience, 16:44:56

2 which has been over 45 years. 16:45:00

3 Q Right. And you indicated in here that 16:45:02

4 your company doesn't have any financial 16:45:19

5 information regarding Amber Heard's pecuniary 16:45:21

6 affairs, correct? 16:45:25

7 A That is correct. We did not file her tax 16:45:28

8 returns. She did not disclose financial 16:45:32

9 information to us. 16:45:34

10 Q And you have -- you're not expressing -- 16:45:36

11 you have no personal knowledge on what -- what a 16:45:42

12 court may have awarded Ms. Heard in the divorce 16:45:46

13 had the parties not reached an agreement, right? 16:45:51

14 A I -- I cannot say to you categorically 16:45:53

15 what a court would have awarded or not. But based 16:45:59

16 upon my experience and the short period of the 16:46:01

17 marriage and the fact that they did not have any 16:46:04

18 children, based upon my experience she would have 16:46:06

19 received very little consideration. 16:46:10

20 MR. ROTTENBORN: Why don't we take about a 16:46:28

21 five-minute break. I'm just going to see if I 16:46:30

22 have any other questions. 16:46:31

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1	THE WITNESS: Certainly. I will do just	16:46:32
2	that. Fine.	16:46:34
3	THE VIDEOGRAPHER: Off the record at 4:46.	16:46:36
4	(Recess was held.)	16:53:50
5	THE VIDEOGRAPHER: Back on the record at	16:53:50
6	4:53.	16:53:57
7	BY MR. ROTTENBORN:	16:53:59
8	Q Mr. White, I believe you testified to this	16:54:01
9	earlier, but just confirming, your firm continues	16:54:03
10	to do work for Mr. Depp and his companies, right?	16:54:08
11	A Yes.	16:54:11
12	Q And has that work continued at or above	16:54:11
13	the pace of the -- the work that we looked at from	16:54:18
14	2016 to 2017?	16:54:22
15	A It's reduced. If you're talking about the	16:54:24
16	fees for services, our fees have continually gone	16:54:29
17	down over time and we've completed what I call a	16:54:35
18	turnaround business strategy and plan.	16:54:39
19	Q And safe to say, though, that Mr. Depp has	16:54:42
20	paid your firm millions of dollars over the last	16:54:44
21	five or six years, right?	16:54:46
22	A I don't recall the exact amount, but the	16:54:48

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1	idea that it would be more than, over five or six	16:54:52
2	years, \$2 million, which would be millions, I	16:54:55
3	think that is a fair statement.	16:54:57
4	MR. ROTTENBORN: I don't have any	16:55:05
5	questions right now subject to whether Leo has any	16:55:06
6	questions.	16:55:11
7	MR. PRESIADO: I do not.	16:55:12
8	MR. ROTTENBORN: I will say -- just want	16:55:14
9	to say on the record, first of all, appreciate you	16:55:17
10	being here today, Mr. White. I'm going to leave	16:55:20
11	the deposition open as there's been a significant	16:55:22
12	amount of information that has been redacted	16:55:25
13	either improperly or without privilege logs, and	16:55:29
14	information that's been ordered by the Court for	16:55:34
15	Mr. Depp to produce that has not been produced.	16:55:37
16	So I'm going to leave the deposition open. But	16:55:39
17	for today, I don't have any other questions. And	16:55:42
18	we'll follow up with Mr. Depp's counsel on that.	16:55:44
19	MR. PRESIADO: And we object to that	16:55:46
20	position, and there's no basis for that position.	16:55:47
21	And from our point of view this deposition is	16:55:52
22	complete. He is a third party, after all.	16:55:55

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1	MR. ROTTENBORN: Well, Mr. Depp is in	16:56:02
2	blatant violation of court orders requiring him to	16:56:03
3	produce documents that he hasn't produced, but we	16:56:06
4	don't need to involve Mr. White for now.	16:56:08
5	But we may have you come back for another	16:56:10
6	deposition, Mr. White.	16:56:14
7	THE WITNESS: Well, that's fair.	16:56:14
8	MR. PRESIADO: The statement is incorrect	16:56:14
9	and, like I said, our position is that Mr. White	16:56:17
10	has fulfilled -- completed his obligation under	16:56:17
11	the notice of deposition and he will not be	16:56:21
12	appearing again.	16:56:25
13	MR. ROTTENBORN: Well, we disagree.	16:56:27
14	MR. PRESIADO: Understood.	16:56:29
15	MR. ROTTENBORN: We'll take it up	16:56:29
16	outside --	16:56:29
17	MR. PRESIADO: Understood. The record's	16:56:30
18	clear.	16:56:31
19	THE WITNESS: In closing, I'd like to	16:56:31
20	thank all the professionals that assisted this	16:56:33
21	process and wish all of you a good evening.	16:56:35
22	MR. ROTTENBORN: And I echo that. Thank	16:56:38

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1 you, Amy, Kim, and Catherine. Much appreciated.

16:56:39

2 THE VIDEOGRAPHER: Thank you. We're off

16:56:40

3 the record at 4:56.

16:56:41

4 (Off the record at 4:56 p.m.)

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ACKNOWLEDGMENT OF DEPONENT

I, EDWARD WHITE, do hereby acknowledge
that I have read and examined the foregoing
testimony, and the same is a true, correct and
complete transcription of the testimony given by
me and any corrections appear on the attached
Errata sheet signed by me.

(DATE)

(SIGNATURE)

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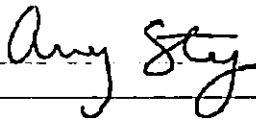
CERTIFICATE OF SHORTHAND REPORTER

NOTARY PUBLIC

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

IN WITNESS WHEREOF, I have hereunto set my
hand and affixed my notarial seal this 8th day of
February, 2022.

My commission expires November 18, 2023.



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