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

Transcript of Laura Allison Wasser, Corporate Designee

Date: December 16, 2020

Case: Depp, II -v- Heard

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WORLDWIDE COURT REPORTING & LITIGATION TECHNOLOGY

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VIRGINIA

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

JOHN C. DEPP, II,

Plaintiff, Civil Action No:

V. CL-2019-0002911

AMBER LAURA Heard,

Defendant.

December 16, 2020

12:04 p.m.

VIDEOCONFERENCE

DEPOSITION of LAURA ALLISON WASSER, taken by
Defendant, before Christine Cutrone, a Notary
Public.

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A P P E A R A N C E S :

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BY: ELAINE CHARLSON BREDEHOFT, ESQ.
JOHN COGGER, ESQ.

BROWN RUDNICK
Attorney for John Depp
2211 Michelson Drive
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Irvine, California 92612

BY: LEO PRESIADO, ESQ.
CAMILLE VASQUEZ, ESQ.

ALSO PRESENT:

AMBER LAURA HEARD
DUSTIN THOMASON (Videographer)
ALAN ROSS (Tech)

1 IT IS HEREBY STIPULATED AND AGREED by
2 and between the attorneys for the
3 respective parties herein, that filing and
4 sealing be and the same are hereby waived.

5 IT IS FURTHER STIPULATED AND AGREED
6 that all objections, except as to the form
7 of the question, shall be reserved to the
8 time of the trial.

9 IT IS FURTHER STIPULATED AND AGREED
10 that the within deposition may be sworn to
11 and signed before any officer authorized
12 to administer an oath, with the same force
13 and effect as if signed and sworn to
14 before the Court.

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Transcript of Laura Allison Wasser, Corporate Designee
Conducted on December 16, 2020

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1	THE VIDEOGRAPHER: Here	12:03:54
2	begins the video deposition of	12:03:55
3	Laura Wasser in the matter of John	12:03:57
4	C. Depp II versus Amber Laura	12:03:59
5	Heard in the Circuit Court of	12:04:02
6	Fairfax County. Case number	12:04:04
7	CL-2019-0002911. Today's date is	12:04:04
8	Wednesday, December 16, 2020. The	12:04:12
9	time on the video monitor is	12:04:15
10	12:04 p.m. The videographer today	12:04:17
11	is Dustin Thomason representing	12:04:20
12	Planet Depos. All parties of this	12:04:23
13	video deposition are attending	12:04:25
14	remotely. Will counsel please	12:04:27
15	voice identify themselves and	12:04:28
16	state whom they represent?	12:04:29
17	MS. BREDEHOFT: Good	12:04:34
18	afternoon. Elaine Bredehoft, and	
19	together with John Cogger, we	12:04:34
20	represent Amber Heard who is also	12:04:36
21	remote.	12:04:40
22	MR. PRESIADO: Leo Presidado	12:04:42

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40100

1	with Camille Vasquez as well for	12:04:45
2	Mr. Depp.	12:04:45
3	MS. RICE: Amy Rice.	12:04:48
4	Wasser, Cooperman & Mandles for	12:04:49
5	the witness Laura Wasser.	12:04:50
6	THE VIDEOGRAPHER: The court	12:04:52
7	reporter today is Christine	12:04:55
8	Cutrone representing Planet Depos.	
9	Will the reporter please swear in	12:04:59
10	the witness?	12:05:00
11	REPORTER: Will counsel	
12	please stipulate that in lieu of	
13	formally swearing in the witness,	
14	the reporter will instead ask the	
15	witness to acknowledge that their	
16	testimony will be true under the	
17	penalties of perjury, that counsel	
18	will not object to the	
19	admissibility of the transcript	
20	based on proceeding in this way,	
21	and that the witness has verified	
22	that LAURA WASSER is in fact the	

1	name of the witness. All counsel	
2	and witness agree?	12:05:23
3	MR. PRESIADO: Yes.	12:05:23
4	MS. RICE: Yes.	12:05:29
5	MS. BREDEHOFT: Yes.	12:05:33
6	REPORTER: Do you hereby	
7	acknowledge that your testimony	
8	will be true under the penalties	
9	of perjury?	
10	THE WITNESS: I do.	12:05:42
11	EXAMINATION	12:05:46
12	BY MS. BREDEHOFT:	12:05:46
13	Q. Would you please state your	12:05:46
14	name and address for the record?	12:05:48
15	A. Laura Allison Wasser.	12:05:51
16	Wasser, Cooperman & Mandles, Suite 800,	12:05:53
17	2049 Century Park East, Los Angeles,	12:05:57
18	California 90049.	12:06:00
19	Q. Thank you. What is your	12:06:02
20	occupation?	12:06:04
21	A. I am an attorney at law.	12:06:04
22	Q. And how long have you been	12:06:07

1	an attorney?	12:06:09
2	A. 26 years.	12:06:11
3	Q. And the law firm that you	12:06:12
4	gave, that you are currently at, have you	12:06:14
5	been there for 26 years?	12:06:17
6	A. It may have had different	12:06:18
7	names, but yes.	12:06:22
8	Q. Were you one of the founding	12:06:23
9	partners of the firm?	12:06:25
10	A. I was not.	12:06:26
11	Q. When did you join the firm?	12:06:27
12	A. I joined the firm in 1994.	12:06:31
13	Q. Now, you represented	12:06:35
14	Mr. Depp in the divorce against Amber	12:06:39
15	Heard; is that correct?	12:06:42
16	A. Yes.	12:06:43
17	Q. And you are here under a	12:06:43
18	subpoena?	12:06:46
19	A. Yes.	12:06:46
20	Q. And you are testifying both	12:06:47
21	in your individual capacity and on behalf	12:06:50
22	of your client; is that correct?	12:06:52

Transcript of Laura Allison Wasser, Corporate Designee
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1	A. Yes.	12:06:56
2	Q. And to make this process go	12:06:58
3	a little bit more quickly, we are	12:06:59
4	combining the two. We've agreed to	12:07:02
5	combine them. So what I like you to do,	12:07:04
6	as we progress through the deposition, if	12:07:05
7	you do not have personal knowledge, but	12:07:07
8	are responding to me on a question based	12:07:10
9	on another lawyer or staff member's	12:07:13
10	communication with you, please let me	12:07:16
11	know that, okay?	12:07:18
12	A. I will do my best.	12:07:19
13	Q. Thank you, I appreciate	12:07:21
14	that.	12:07:22
15	Have you had your deposition	12:07:22
16	taken before?	12:07:24
17	A. I don't believe I have.	12:07:24
18	Q. Well, I'll be asking you a	12:07:29
19	series of questions. If at any time you	12:07:32
20	don't understand my question, just let me	12:07:35
21	know that, I will rephrase it, repeat,	12:07:36
22	whatever you need. If I ask you a	12:07:40

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1	question, you answer it, I'm going to	12:07:40
2	assume that you understood my question,	12:07:42
3	okay?	12:07:45
4	A. Okay.	12:07:45
5	Q. And I'm also going to be	12:07:46
6	asking you, and it's kind of a difficult	12:07:49
7	thing, but important here, is to make	12:07:50
8	sure that you verbalize your answers.	12:07:52
9	Sometimes it's common to shake your head	12:07:54
10	or nod your head in response, and so I	12:07:56
11	may say is that a yes or is that a no,	12:07:59
12	just to make sure the court reporter has	12:08:01
13	an accurate recording of this; does that	12:08:03
14	work for you?	12:08:07
15	A. It does.	12:08:08
16	Q. Great. If at any time you	12:08:09
17	need to take a break, just let me know	12:08:11
18	and we can certainly take a break here.	12:08:13
19	The only thing that I would ask is that	12:08:15
20	you answer whatever the pending question	12:08:17
21	is before we take a break, okay?	12:08:20
22	A. Okay.	12:08:21

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1	Q. When I said this morning,	12:08:22
2	good afternoon, that's because I'm on the	12:08:24
3	east coast and I realized that you're on	12:08:27
4	California time, so good morning to you.	12:08:29
5	A. Good morning.	12:08:32
6	Q. Have you spoken with	12:08:32
7	Mr. Depp or anyone on his behalf in	12:08:34
8	preparation for the deposition relating	12:08:36
9	in any manner to this deposition?	12:08:40
10	MR. PRESIADO: Objection.	12:08:43
11	Calls for attorney/client	12:08:44
12	communication.	12:08:45
13	MS. BREDEHOFT: I'm just	12:08:47
14	asking if she has spoken with him.	12:08:47
15	MR. PRESIADO: That's not	12:08:52
16	all you asked. You asked -- you	12:08:54
17	characterized what you asked her	12:08:54
18	she had spoken about.	12:08:56
19	MS. BREDEHOFT: My question	12:08:59
20	was --	12:08:59
21	MR. PRESIADO: You're	12:09:00
22	eliciting an attorney/client	12:09:02

Transcript of Laura Allison Wasser, Corporate Designee
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1	communication as to the substance	12:09:03
2	of the communication.	12:09:05
3	Q. My question was, have you	12:09:06
4	spoken with Mr. Depp or anyone on his	12:09:09
5	behalf in the preparation for this	12:09:12
6	deposition or relating in any manner to	12:09:13
7	this deposition? I haven't asked you for	12:09:18
8	content, I just asked if you had.	12:09:20
9	MR. PRESIADO: Same	12:09:22
10	objection. You are asking for the	12:09:22
11	content. You're asking if she's	12:09:23
12	spoken to Mr. Depp about this	12:09:24
13	deposition.	12:09:26
14	Q. Have you spoken with	12:09:29
15	Mr. Depp in the past year?	12:09:31
16	A. No.	12:09:33
17	Q. Have you spoken with any	12:09:34
18	attorney on behalf of Mr. Depp in the	12:09:36
19	past year?	12:09:39
20	A. Yes.	12:09:40
21	Q. When is the last time you	12:09:42
22	spoke with an attorney for Mr. Depp?	12:09:44

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1	A. Yesterday.	12:09:48
2	Q. And was that by telephone?	12:09:50
3	A. Yes.	12:09:55
4	Q. And how long was that	12:09:56
5	telephone call?	12:09:58
6	A. 15 minutes.	12:09:59
7	Q. And I'm going to ask, and I	12:10:02
8	suspect that I'm going to get an	12:10:07
9	objection, but what did you discuss?	12:10:08
10	MR. PRESIADO: Objection.	12:10:12
11	MS. RICE: Objection.	12:10:17
12	Privileged. Instruct the witness	12:10:18
13	not to answer.	12:10:18
14	MR. PRESIADO: Same	12:10:19
15	objection.	12:10:20
16	Q. What documents have you	12:10:20
17	reviewed in preparation for the	12:10:22
18	deposition today?	12:10:23
19	MS. RICE: Assumes a fact	12:10:26
20	not in evidence. No foundation.	12:10:28
21	MS. BREDEHOFT: Good point.	12:10:31
22	MR. PRESIADO: Same	

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40108

1	objection.	12:10:31
2	Q. Ms. Wasser, have you	12:10:31
3	reviewed any documents in preparation for	12:10:37
4	the deposition today?	12:10:40
5	A. No.	12:10:41
6	Q. Have you spoken with anyone	12:10:41
7	in connection with responding to the	12:10:44
8	corporate designee designation topics	12:10:47
9	other than Mr. Depp or other than	12:10:51
10	Mr. Depp's counsel or your counsel?	12:10:53
11	A. No.	12:10:55
12	Q. What have you done to	12:10:56
13	prepare for this deposition other than	12:11:02
14	communicate with your counsel or	12:11:05
15	Mr. Depp's counsel?	12:11:08
16	MR. PRESIADO: Objection.	12:11:10
17	Assumes facts not in evidence.	12:11:11
18	Q. You still give an answer	12:11:18
19	though.	12:11:19
20	A. Nothing.	12:11:19
21	Q. Your practice has primarily	12:11:22
22	been focused on domestic relations in	12:11:27

R;	1	California; is that correct?	12:11:32
IO;			
FSPK;	2	A. Yes.	12:11:33
IH;			
ICD;	3	Q. Are you a member of any bar	12:11:33
ET			
	4	other than California?	12:11:35
	5	A. No.	12:11:36
	6	Q. During the period 2012 to	12:11:37
	7	2016, was California a no-fault state	12:11:40
	8	with respect to divorce?	12:11:45
	9	MS. RICE: Objection,	12:11:48
	10	relevance.	12:11:50
	11	MR. PRESIADO: Same	12:11:52
	12	objection.	12:11:52
	13	Q. Ms. Wasser, you still get to	12:11:55
	14	answer the questions. The only questions	12:11:57
	15	that you would not respond to is if your	12:11:58
	16	counsel instructs you not to answer.	12:12:00
	17	That might make this go a little bit	12:12:02
	18	faster. So they have the right to pose	12:12:05
	19	their objections and put those on the	12:12:07
	20	record. And then if they have not	12:12:09
	21	instructed you not to answer, then you	12:12:11
	22	can go ahead and try to answer it unless	12:12:13

1 I try to rephrase it first because I want 12:12:15
2 to correct or change something, okay? Do 12:12:19
3 you want me to ask that again? 12:12:21

RO;
IO;
FSPK;
IH;
ICD;
ET

4 A. No. The answer is that 12:12:22
5 California was a no-fault state during 12:12:24
6 that period. 12:12:27

7 Q. And what does that mean, 12:12:27
8 no-fault state? 12:12:30

9 MS. RICE: Objection. I'm 12:12:32
10 going to instruct the witness not 12:12:33
11 to answer on the grounds that 12:12:34
12 you're trying to turn her into an 12:12:35
13 expert witness with respect to 12:12:36
14 California law. That's not the 12:12:37
15 purpose of this deposition, and 12:12:39
16 it's inappropriate. 12:12:40

17 MR. PRESIADO: Same 12:12:43
18 objection. 12:12:44

19 MS. RICE: It's also not 12:12:49
20 relevant. 12:12:51

21 Q. What is your understanding 12:12:52
22 of what no-fault means in -- 12:12:54

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16

1	MS. RICE: Same objection.	12:12:58
2	Excuse me. Go ahead. Same	12:12:58
3	objection. Same instruction.	12:13:04
4	MR. PRESIADO: Same	12:13:07
5	objection.	12:13:07
6	MS. BREDEHOFT: Let me just	12:13:13
7	jump in here, and John, maybe you	12:13:14
8	can -- we can discuss this.	12:13:15
9	In Virginia, you do not have	12:13:19
10	the right to instruct someone not	12:13:21
11	to answer on the basis other than	12:13:24
12	attorney/client privilege and work	12:13:26
13	product, or if there is some	12:13:28
14	protective order or some other	12:13:33
15	issue that a court has ruled on.	12:13:35
16	Everything else needs to still be	12:13:36
17	responded to. You can preserve	12:13:39
18	your objections, because we -- the	12:13:41
19	judge has already said in this	12:13:43
20	case, the date for us to discuss	12:13:44
21	all of the issues and objections	12:13:46
22	that you raise here, before	12:13:48

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17

1	anything is determined to be	12:13:51
2	admitted in the case. It is not a	12:13:52
3	valid objection. You can argue --	12:13:55
4	in fact, it's not even a valid	12:13:58
5	objection to say you're turning	12:13:59
6	the witness into an expert, but	12:14:01
7	it's also not valid to be able to	12:14:01
8	instruct them not to answer. If	12:14:03
9	you'd like to consult with counsel	12:14:06
10	about this, then maybe it's a good	12:14:09
11	idea to take that break now before	12:14:12
12	we get into this further and talk	12:14:14
13	with them, because the alternative	12:14:16
14	to this is if I have instructions	12:14:19
15	not to answer, then I will need to	12:14:21
16	go back in, move to compel, and we	12:14:23
17	will probably have to reconvene	12:14:26
18	Ms. Wasser's deposition, which I	12:14:27
19	certainly don't have any desire	12:14:29
20	to, and I'm sure Ms. Wasser	12:14:32
21	doesn't have any desire, and I'm	12:14:34
22	sure the rest of you don't. So if	12:14:35

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1	you would like to take a little	12:14:37
2	break and consult with counsel on	12:14:38
3	this, let's do that now because I	12:14:39
4	don't want to have a lot of	12:14:42
5	instructions not to answer that	12:14:44
6	are not appropriate under the	12:14:45
7	court that we are working with.	12:14:48
8	MS. RICE: We don't need a	12:14:51
9	break. Thank you. Please ask	12:14:52
10	your next question.	12:14:54
11	Q. I'm going to go back to that	12:14:54
12	question, because I'd like you to	12:14:56
13	reconsider that under this basis..	12:14:57
14	What is your understanding,	12:15:00
15	Ms. Wasser, of what a no-fault divorce	12:15:03
16	state means?	12:15:07
17	MS. RICE: Same objection.	12:15:07
18	Same instruction.	12:15:08
19	MR. PRESIADO: Same	12:15:11
20	objection, plus relevance	12:15:11
21	objection.	12:15:20
22	MS. BREDEHOFT: Well, can	12:15:22

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19

1	you give me the authority you	12:15:26
2	have, Ms. Rice, for why you can	12:15:27
3	instruct her not to answer on that	12:15:29
4	question?	12:15:31
5	MS. RICE: I'm not going to	12:15:32
6	use the time for this deposition	12:15:33
7	to do that. If you want to have a	12:15:34
8	conversation later about retaining	12:15:38
9	Ms. Wasser to opine on California	12:15:40
10	law in your Virginia proceeding,	12:15:42
11	we can do so. That's not the	12:15:44
12	purpose of this deposition.	12:15:46
13	MS. BREDEHOFT: I can assure	12:15:49
14	you that I'm not trying to retain	12:15:50
15	Ms. Wasser as an expert witness.	12:15:52
16	However, there is no law that I'm	12:15:55
17	aware of that allows you to	12:15:57
18	instruct her not to answer. I'm	12:15:59
19	trying to get through this	12:16:00
20	deposition so we do not have to	12:16:01
21	come back. So I would like you to	12:16:03
22	give me the authority. I've	12:16:05

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1	already indicated to you that	12:16:06
2	that's not admissible in the	12:16:07
3	Commonwealth of Virginia where	12:16:10
4	this lawsuit has been brought, and	12:16:13
5	I'm asking you to provide me with	12:16:14
6	the authority that permits you to	12:16:16
7	instruct your witness not to	12:16:17
8	answer. Otherwise, I would ask	12:16:18
9	you to rethink the instruction not	12:16:19
10	to answer, let her answer and	12:16:21
11	preserve your objection. If	12:16:24
12	that's a valid objection, then the	12:16:25
13	Court will rule on that long	12:16:28
14	before we go into trial.	12:16:29
15	MS. RICE: Thank you. I	12:16:31
16	understand your position. You've	12:16:33
17	articulated it twice now. Let's	12:16:35
18	move on to a new question.	12:16:36
19	MS. BREDEHOFT: Are you	12:16:40
20	refusing to provide me with any	
21	authority for the instruction not	12:16:41
22	to answer?	12:16:42

1 MS. RICE: I'm not going to 12:16:42
2 engage in a meet and confer during 12:16:42
3 the course of the deposition. 12:16:45

4 MS. BREDEHOFT: I'm not 12:16:46
5 asking for a meet and confer. I'm 12:16:46
6 asking for the authority to 12:16:49
7 prevent a witness from answering 12:16:50
8 when it is in clear contravention 12:16:53
9 of Virginia law. 12:16:55

10 MS. RICE: Counsel, please 12:16:55
11 move on. 12:16:57

RO; IO; 12 Q. During the period 2012 to 12:16:59
FSPK; IH; 13 2016, was California a community property 12:17:03
ICD; ET 14 state with respect to the provision of 12:17:06
15 assets in the divorce? 12:17:09

16 A. Yes. 12:17:11

17 MR. PRESIADO: Objection, 12:17:13
18 relevance. 12:17:14

RO; IO; 19 Q. And what does that mean to 12:17:14
FSPK; IH; 20 you? 12:17:17
ICD; ET

21 MS. RICE: Objection. 12:17:17

22 Vague, ambiguous, unintelligible, 12:17:18

1 overbroad, not relevant. 12:17:21

2 MR. PRESIADO: Same 12:17:24

3 objections. 12:17:24

RO; 4 A. California is a community 12:17:30
IO; 5 property state. And what that means to 12:17:32
FSPK; 6 me is that assets which were earned or 12:17:33
IH; 7 created during the course of the 12:17:36
ICD; 8 marriage, absent some other theory of law 12:17:39
ET 9 applied, be divided equally. 12:17:43

10 Q. And what do you mean by 12:17:48
11 absence on theory or law applied? 12:17:53

12 MS. RICE: Objection. 12:17:56

13 Vague, irrelevant. Calling for an 12:17:57
14 expert opinion. Calling for an 12:18:02
15 opinion. Wasting our time. 12:18:03

16 MR. PRESIADO: Same 12:18:07

17 objection. 12:18:07

18 A. Is that a valid objection in 12:18:09
19 Virginia? 12:18:10

20 MS. RICE: Wasting her time? 12:18:12

21 Probably only in California. 12:18:15

22 MR. PRESIADO: Universal. 12:18:18

1	A.	I'm sorry, Elaine, what was	12:18:20
RO; IO; FSPK; IH; ICD; ET	2	the question? Oh, a theory -- when I say	12:18:21
	3	a theory of law, I mean if there's a	12:18:24
	4	premarital agreement. If there's some	12:18:26
	5	other -- it's not completely blanket	12:18:29
	6	community property. There may be things	12:18:33
	7	that were earned from a separate property	12:18:35
	8	source that would not be considered	12:18:38
	9	community property. So I was just trying	12:18:41
	10	to provide for the record some exceptions	12:18:43
	11	to what would be considered community	12:18:47
	12	property and therefore divided equally.	12:18:50
	13	Q. Now, if someone alleges	12:18:52
	14	domestic violence or abuse against their	12:18:55
	15	spouse, would that change the amount they	12:18:58
	16	would otherwise be entitled to under	12:19:00
	17	community property laws?	12:19:03
	18	MS. RICE: The question is	12:19:05
	19	unintelligible as phrased. It's	12:19:06
	20	an incomplete hypothetical. It's	12:19:07
	21	beyond the scope of this	12:19:10
	22	deposition. It's irrelevant.	12:19:11

1 MR. PRESIADO: Same 12:19:13
2 objection. Plus lacks foundation. 12:19:13
3 THE WITNESS: Could you 12:19:16
4 repeat the question, please? 12:19:18
5 MS. BREDEHOFT: Madam court 12:19:19
6 reporter, can you just read it
7 back, please?
8 (The record is read back by
9 the reporter.) 12:19:38
10 A. No. 12:19:38
11 Q. What is the significance of
12 a CLETS DVRO? 12:19:41
13 MS. RICE: Relevance. Calls 12:19:55
14 for an opinion. Calls for an 12:19:56
15 expert opinion beyond the scope of 12:19:57
16 this deposition. 12:19:59
17 MR. PRESIADO: Same 12:20:01
18 objections. 12:20:02
19 A. I'm not sure I understand 12:20:04
20 your question. What is the relevance of 12:20:05
21 it? 12:20:08
22 Q. Well, that's fair. Let me 12:20:09

RO; IO;
FSPK; IH;
ICD; ET

1	ask you a little differently.	12:20:12
2	What does it mean to have a	12:20:12
3	CLETS DVRO.	12:20:14
4	MS. RICE: Objection.	12:20:17
5	Relevance. Beyond the scope of	12:20:17
6	this deposition. Calls for an	12:20:19
7	opinion. Calls for a legal	12:20:20
8	opinion. It's an incomplete	12:20:21
9	hypothetical.	12:20:24
10	MR. PRESIADO: Same	12:20:25
11	objection.	12:20:26
12	A. I don't know how to answer	12:20:28
13	that unless you're applying it to a	12:20:29
14	certain fact pattern.	12:20:31
15	Q. If an individual obtains a	12:20:32
16	CLETS DVRO, is that something that goes	12:20:38
17	into the law enforcement database?	12:20:42
18	A. I'm not sure.	12:20:45
19	Q. Have you ever obtained a	12:20:47
20	CLETS DVRO on behalf of any client?	12:20:51
21	MS. RICE: Objection.	12:20:55
22	Instruct her not to answer on the	12:20:56

1	grounds that's what she's done for	12:20:57
2	other clients is not relevant.	12:20:59
3	It's privileged. It's work	12:21:03
4	product.	12:21:04
5	MR. PRESIADO: Same	12:21:06
6	objection.	12:21:07
7	Q. I'm not asking for the	12:21:07
8	identity. I'm just saying, have you ever	12:21:08
9	obtained one before?	12:21:10
10	MS. RICE: Same objection.	12:21:12
11	Same instruction.	12:21:13
12	MR. PRESIADO: Same	12:21:15
13	objection.	12:21:15
14	MS. RICE: It's also not	12:21:17
15	relevant.	12:21:19
16	A. And I'm not willing to	12:21:21
17	answer that question, because I don't	12:21:22
18	speak about any of our past or pending	12:21:23
19	cases. Not even if you are not asking me	12:21:26
20	the names, I'm sorry, I just won't do it.	12:21:29
21	Q. What is your experience in	12:21:31
22	either obtaining or defending against	12:21:35

1	CLETS DVROs?	12:21:40
2	MS. RICE: Same objection.	12:21:42
3	It's just a different way of	12:21:43
4	trying to intrude upon the	12:21:44
5	attorney/client privilege between	12:21:46
6	Ms. Wasser and her clients over	12:21:48
7	the years. It's not relevant. It	12:21:50
8	violates the privilege. It's	12:21:52
9	violates Business and Professions	12:21:53
10	Code Section 6068E. I'll instruct	12:21:54
11	her not to answer.	12:21:58
12	MR. PRESIADO: Same	12:21:59
13	objections plus vague and	12:22:00
14	ambiguous.	12:22:01
15	Q. Do you even know what a	12:22:04
16	CLETS DVRO is?	12:22:05
17	A. Yes.	12:22:08
18	Q. And how is it that you know	12:22:08
19	that?	12:22:11
20	MS. RICE: Objection to the	12:22:13
21	extent it would intrude upon her	12:22:13
22	privileged communications or work	12:22:16

1	product for other clients. I'm	12:22:18
2	going to instruct her not to	12:22:19
3	answer. It's also not relevant.	12:22:20
4	MR. PRESIADO: Relevance.	12:22:24
5	Objection.	12:22:29
6	MS. BREDEHOFT: This is	12:22:33
7	going to be a long deposition.	12:22:34
8	Again, you can't instruct her not	12:22:38
9	to answer. But we will just keep	12:22:41
10	working on this, and we'll come	12:22:42
11	back later on this. But I'll try	12:22:43
12	to get through it as much as I can	12:22:45
13	so we don't have to come through	12:22:47
14	again for a long period of time.	12:22:49
15	Q. So let's go back to the	12:22:51
16	CLETS DVR [sic].	12:22:53
17	Did you have an	12:22:54
18	understanding whether there's a	12:22:55
19	difference between a CLETS DVRO and a	12:22:56
20	privately obtained DVRO?	12:22:59
21	MS. RICE: The question is	12:23:02
22	unintelligible as phrased. It's	12:23:04

1	not relevant. Calls for an	12:23:04
2	opinion. Calls for a legal	12:23:07
3	opinion. It's beyond the scope of	12:23:10
4	this deposition.	12:23:11
5	MR. PRESIADO: Same	12:23:12
6	objection.	12:23:13
7	MS. RICE: And it's not	12:23:15
8	relevant.	12:23:16
9	A. I actually don't understand	12:23:18
10	your question.	12:23:19
11	Q. Okay. That's fair.	12:23:20
12	Are you aware of what type	12:23:23
13	of restraining order is actually entered	12:23:27
14	in the law enforcement database?	12:23:30
15	MS. RICE: Question is	12:23:33
16	unintelligible as phrased. It's	12:23:35
17	vague as to time. It's an	12:23:36
18	incomplete hypothetical. It's not	12:23:37
19	relevant.	12:23:39
20	MR. PRESIADO: Same	12:23:41
21	objections.	12:23:42
22	A. No.	12:23:44

Transcript of Laura Allison Wasser, Corporate Designee
Conducted on December 16, 2020

30

1	Q. Have you ever represented a	12:23:45
2	victim of domestic abuse or violence?	12:23:53
3	MS. RICE: Objection.	12:23:56
4	Instruct the witness not to answer	12:23:57
5	on the grounds it violates	
6	attorney/client privilege. The	12:24:01
7	work product doctrine. Business	12:24:02
8	and Professions Code Section	12:24:02
9	6068E1. And it's not relevant.	12:24:04
10	It's beyond the scope of this	12:24:08
11	deposition.	12:24:10
12	MR. PRESIADO: Objection,	12:24:10
13	relevance.	12:24:13
14	THE WITNESS: I'm sorry,	12:24:15
15	Amy, did you instruct me not to	12:24:16
16	answer?	12:24:17
17	MS. RICE: I did.	12:24:17
18	MS. BREDEHOFT: A lot of	12:24:38
19	this we'll have to come back, and	12:24:39
20	I'd really like to not do that. I	12:24:40
21	know you wouldn't like to either.	12:24:42
22	I wish you would -- counsel would	12:24:44

1 reconsider. 12:24:47

2 Q. Do you have any 12:25:10

3 understanding of whether -- if a police 12:25:13

4 report was filed, the individual 12:25:16

5 reporting the domestic violence or abuse 12:25:19

6 must be subjected to a medical 12:25:22

7 examination? 12:25:25

8 MS. RICE: Objection. 12:25:26

9 Incomplete hypothetical, 12:25:27

10 unintelligible, irrelevant. Calls 12:25:28

11 for an opinion. 12:25:31

12 MR. PRESIADO: Same 12:25:33

13 objections plus compound. 12:25:34

14 A. No. 12:25:37

R, IO, 15 Q. Are you aware of any law in 12:25:37

FSPK; 16 California that would require a medical 12:25:42

IH; 17 examination of an individual who's 12:25:45

ET 18 reported domestic violence or abuse? 12:25:48

19 MS. RICE: Same objection as 12:25:51

20 to the last question. 12:25:52

R, IO, 21 A. No. 12:25:54

FSPK; 22 MR. PRESIADO: Same 12:25:55

IH; ET

1	objections.	12:25:56
2	Q. In your years of experience,	12:25:58
3	would you agree that victims of domestic	12:26:03
4	violence and abuse are frequently	12:26:06
5	reluctant to report the abuse?	12:26:08
6	MS. RICE: Objection. I'm	12:26:10
7	going to instruct her not to	12:26:11
8	answer. This is really	12:26:12
9	inappropriate. I wondered why you	12:26:14
10	were deposing Ms. Wasser. Now I	12:26:16
11	understand that somehow you're	12:26:18
12	trying to, you know, create some	12:26:20
13	kind -- to transform her into some	12:26:22
14	kind of expert on domestic	12:26:26
15	violence in California law. It's	12:26:28
16	inappropriate, counsel.	12:26:29
17	MR. PRESIADO: Objection.	12:26:34
18	Vague and ambiguous and calls for	12:26:35
19	speculation.	12:26:37
20	A. Could you repeat the	12:26:40
21	question, please?	12:26:41
22	Q. In your years of experience	12:26:41

1	in this area, would you agree that	12:26:44
2	victims of domestic violence or abuse are	12:26:45
3	frequently reluctant to report the abuse?	12:26:49
4	MS. RICE: Objection. Calls	12:26:52
5	for speculation as phrased. It's	12:26:53
6	vague and ambiguous. It's an	12:26:55
7	incomplete hypothetical. Her	12:26:57
8	opinion is irrelevant.	12:26:59
9	MR. PRESIADO: All of those	12:27:03
10	plus assumes facts not in	12:27:04
11	evidence.	12:27:06
12	A. In my years of experience?	12:27:07
13	No.	12:27:09
14	Q. So do you encourage victims	12:27:09
15	of domestic violence abuse to report the	12:27:15
16	abuse?	12:27:18
17	MS. RICE: Objection to the	12:27:18
18	extent you are asking about	12:27:19
19	communications she has with her	12:27:21
20	clients that's privileged. I'm	12:27:23
21	instructing her not to answer.	12:27:24
22	Otherwise -- and it's also utterly	12:27:26

1	irrelevant.	12:27:30
2	MR. PRESIADO: Objection.	12:27:30
3	Irrelevant.	12:27:32
4	MS. BREDEHOFT: I'm sorry,	12:27:37
5	you're instructing her not to	
6	answer?	12:27:38
7	MS. RICE: Yes.	12:27:38
8	Q. I have to ask, because you	12:27:42
9	said the years of experience, you'd say	12:27:43
10	they're not frequently reluctant to	12:27:46
11	report the abuse.	12:27:49
12	So how many victims have you	12:27:51
13	represented that were not reluctant to	12:27:53
14	report it?	12:27:55
15	MS. RICE: Objection. It	12:27:57
16	intrudes upon the attorney/client	12:27:58
17	privilege. It violates Business	12:28:02
18	and Professions Code Section	12:28:03
19	6068E. It's irrelevant. And	12:28:04
20	based on the privilege and	12:28:07
21	Business and Professions Code, I'm	12:28:08
22	instructing her not to answer.	12:28:10

1 MR. PRESIADO: Objection. 12:28:13

2 Irrelevant. 12:28:14

3 Q. When you have a client who 12:28:15

4 is alleging domestic violence or abuse, 12:28:23

5 do you typically attempt to investigate 12:28:28

6 whether the allegations are true or not? 12:28:32

7 MS. RICE: Instructing the 12:28:34

8 witness not to answer on the 12:28:35

9 grounds of the attorney/client 12:28:37

10 privilege, the work product 12:28:39

11 doctrine, and Business and 12:28:41

12 Professions Code Section 6068E. 12:28:41

13 In addition, the question calls 12:28:44

14 for information that's not 12:28:45

15 irrelevant. 12:28:47

16 MR. PRESIADO: Objection, 12:28:47

17 relevance. 12:28:51

18 MS. BREDEHOFT: I'm sorry, 12:28:54

19 did you instruct her not to answer 12:28:54

20 again? 12:28:56

21 MS. RICE: I did. 12:28:56

Q. In obtaining a temporary 12:28:58

R; IO; 22
FSPK; IH;
ICD; ET

R; IO; FSPK; 1	restraining order, what is your	12:29:05
IH; ICD; ET 2	understanding of the process?	12:29:10
3	MS. RICE: Assumes facts not	12:29:13
4	in evidence. Incomplete	12:29:14
5	hypothetical. Vague as to time.	12:29:16
6	Irrelevant. Calls for an opinion.	12:29:18
7	Calls for a legal opinion. Beyond	12:29:19
8	the scope of this deposition.	12:29:22
9	MR. PRESIADO: Objection,	12:29:24
10	relevance.	12:29:27
R; IO;11	A. The moving party files	12:29:30
FSPK;		
IH; 12	generally with 24 hours notice to the	12:29:33
ICD; ET		
13	person who is being accused of domestic	12:29:39
14	violence, a declaration and forms with	12:29:42
15	the court, and requests a temporary	12:29:47
16	domestic violence restraining order that	12:29:52
17	would generally last no longer than a	12:29:55
18	21-day period when the defendant is able	12:29:57
19	to make his or her arguments as to why	12:30:01
20	such a restraining order would be	12:30:05
21	inappropriate.	12:30:06
22	Q. And the temporary	12:30:07

R; IO;
FSPK; 1
IH; ICD;
ET 2

restraining order, can it be continued?

12:30:12

A. Yes.

12:30:16

3 Q. And the 21 days, if the
4 defendant comes in to contest it, and the
5 court denies that, is a permanent
6 restraining order then entered?

12:30:17

12:30:21

12:30:25

12:30:30

7 MS. RICE: Vague and
8 ambiguous. Incomplete
9 hypothetical.

12:30:33

12:30:35

12:30:36

10 MR. PRESIADO: Objection,
11 relevance.

12:30:37

12:30:38

12 MS. RICE: Assumes facts not
13 in evidence.

12:30:39

12:30:40

14 A. I actually did not
15 understand your question, because you
16 said if the Court denies what?

12:30:43

12:30:44

12:30:46

17 Q. Fair. Let me go back.

12:30:49

18 So 21 days, let's say that
19 there's the hearing. I think you said

12:30:51

12:30:54

20 they usually go 21 days, right? Is it

12:30:57

21 your understanding then that the moving

12:30:59

22 party can request a permanent restraining

12:31:02

1	order while the defendant contests?	12:31:07
2	MS. RICE: Vague and	12:31:11
3	ambiguous, unintelligible.	12:31:13
4	MR. PRESIADO: Objection,	12:31:16
5	relevance, and those objections.	12:31:18
6	A. Can you define what a	12:31:19
7	permanent restraining order versus --	12:31:22
8	Q. I'll ask you rather than me	12:31:24
9	defining it. That's fair.	12:31:28
10	What do you understand to be	12:31:29
11	a permanent restraining order?	12:31:30
12	MR. PRESIADO: Objection,	12:31:35
13	relevance.	12:31:36
14	A. I think the Court has	12:31:39
15	discretion. I think that generally when	12:31:41
16	a quote, permanent restraining order is	12:31:43
17	granted, the judicial officer making that	12:31:45
18	order will put a timeframe on it. It's	12:31:48
19	not standard, and it's never permanent,	12:31:50
20	meaning for the entirety of the	12:31:53
21	defendant's or restrained individual's	12:31:56
22	life. It's generally one to five years.	12:31:58

1	Q. Even though it's called	12:32:02
2	permanent, it's not technically	12:32:04
3	permanent, correct?	12:32:07
4	A. Just like permanent support.	12:32:07
5	Q. Okay.	12:32:09
6	I asked you earlier whether	12:32:11
7	you had represented any individuals who	12:32:23
8	had accused their spouse or complained to	12:32:25
9	them about their spouse engaging --	12:32:28
10	(Court reporter asked for	
11	repeat.)	
12	MS. BREDEHOFT: I'll tell	
13	you what, I'll rephrase it at the	
14	same time and clean it up. How's	
15	that? We'll start clean.	
16	Q. I asked you earlier whether	12:32:47
17	you had ever represented anyone who had	12:32:48
18	asserted that they were the victim of	12:32:53
19	domestic violence or abuse, and your	12:32:56
20	counsel instructed you not to answer.	12:32:58
21	I'm now going to ask you if you have ever	12:33:00
22	represented anyone who was accused of	12:33:03

1	domestic abuse or violence?	12:33:05
2	MS. RICE: Answer yes or no.	12:33:08
3	A. Yes.	12:33:10
4	Q. On how many occasions?	12:33:10
5	MS. RICE: Objection. It's	12:33:13
6	not relevant.	12:33:16
7	MR. PRESIADO: Objection,	12:33:19
8	relevance.	12:33:21
9	A. I don't know.	12:33:23
10	Q. Okay. Do you know how many	12:33:23
11	times you have represented anyone who has	12:33:31
12	alleged that they are the victim of	12:33:38
13	domestic abuse or violence?	12:33:40
14	A. No.	12:33:41
15	MR. PRESIADO: Objection,	12:33:44
16	relevance.	12:33:45
17	Q. Would you estimate it's more	12:33:46
18	than five?	12:33:49
19	MR. PRESIADO: Same	12:33:51
20	objection.	12:33:52
21	A. Which designation; accused	12:33:53
22	or accuser?	12:33:55

1	Q.	Let's go one at a time; how	12:33:57
2		about accused?	12:33:59
3	A.	Yes.	12:34:01
4	Q.	Would you say more than ten?	12:34:03
5		MR. PRESIADO: Objection,	12:34:06
6		relevance.	12:34:07
7	A.	No.	12:34:10
8	Q.	How many times would you say	12:34:11
9		you have represented the person accusing	12:34:13
10		of domestic abuse or violence?	12:34:16
11	A.	More than five.	12:34:18
12		MR. PRESIADO: Objection,	12:34:19
13		relevance.	12:34:20
14		THE WITNESS: Sorry, Leo.	12:34:21
15	A.	More than five less than	12:34:29
16		ten.	12:34:30
17	Q.	Have you, in any of the	12:34:30
18		instances where you represented either	12:34:36
19		the party whose accused of the domestic	12:34:39
20		abuse or violence, or accusing of	12:34:43
21		domestic abuse or violence, have you ever	12:34:47
22		gone to trial in any of those instances?	12:34:49

1	MS. RICE: Objection,	12:34:54
2	relevance.	12:34:55
3	MR. PRESIADO: Objection,	12:34:55
4	same objection.	12:34:56
5	A. Yes.	12:34:59
6	Q. On how many occasions?	12:34:59
7	MS. RICE: Relevance.	12:35:04
8	MR. PRESIADO: Same	12:35:06
9	objection.	12:35:07
10	A. Three.	12:35:09
11	Q. And were any of those after	12:35:09
12	2016?	12:35:15
13	MR. PRESIADO: Objection,	12:35:20
14	relevance.	12:35:21
15	A. Yes.	12:35:28
16	Q: How many of them?	12:35:28
17	A. One.	12:35:30
18	Q. And when approximately were	12:35:31
19	the other two?	12:35:34
20	MS. RICE: Relevance.	12:35:37
21	MR. PRESIADO: Same	12:35:39
22	objection.	12:35:40

1	A. Probably within five years	12:35:43
2	prior to 2016. Right around 2014, there	12:35:45
3	seem to have been a large surge and trend	12:35:51
4	in allegations of domestic violence made	12:35:55
5	particularly down here in Los Angeles.	12:35:59
6	Although the trial that I had was at	12:36:03
7	another venue.	12:36:05
8	Q. And were both of the times	12:36:07
9	in 2014, you were representing the person	12:36:08
10	accused of domestic violence or abuse?	12:36:11
11	A. My testimony was not that	12:36:15
12	they were in 2014.	12:36:17
13	Q. I'm sorry. The ones that	12:36:19
14	were within five years prior to 2016,	12:36:22
15	were you -- in the two cases that you	12:36:28
16	took to trial, were you representing the	12:36:30
17	person accused of the domestic violence	12:36:31
18	and abuse or were you representing the	12:36:33
19	accuser?	12:36:35
20	MS. RICE: Relevance.	12:36:36
21	MR. PRESIADO: Objection,	12:36:38
22	relevance.	12:36:39

Transcript of Laura Allison Wasser, Corporate Designee
Conducted on December 16, 2020

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1	A.	I believe it was one of	12:36:41
2		each.	12:36:43
3	Q.	And in the one that was	12:36:43
4		after 2016, which one were you	12:36:47
5		representing?	12:36:50
6	A.	The defendant.	12:36:51
7	Q.	Who was accused of?	12:36:53
8	A.	Correct.	12:36:57
9	Q.	Were any of those three	12:36:57
10		cases high publicity ones with well-known	12:37:03
11		figures?	12:37:10
12		MS. RICE: Objection,	12:37:11
13		relevance.	12:37:11
14		MR. PRESIADO: Same	12:37:15
15		objection.	12:37:15
16	A.	No.	12:37:17
17	Q.	Do you have policies that	12:37:17
18		you follow at your firm respecting how	12:37:22
19		you approach cases depended upon whether	12:37:26
20		there are allegations of domestic abuse	12:37:30
21		and violence?	12:37:32
22		MS. RICE: Question is	12:37:33

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1	unintelligible, vague and	12:37:34
2	ambiguous.	12:37:37
3	MR. PRESIADO: Same	12:37:37
4	objection and relevance.	12:37:38
5	A. I actually did not	12:37:40
6	understand your question.	12:37:41
7	Q. Do you have a specific	12:37:42
8	approach, if you will, on cases that	12:37:53
9	involve allegations of domestic abuse and	12:37:57
10	violence?	12:38:00
11	MS. RICE: Objection.	12:38:00
12	Instruct the witness not to answer	12:38:00
13	on the grounds the attorney work	12:38:02
14	product doctrine. Business and	12:38:04
15	Professions Code Section 6068E.	12:38:05
16	And it's also not relevant.	12:38:07
17	MR. PRESIADO: Objection.	12:38:09
18	Objection, relevance.	12:38:11
19	MS. BREDEHOFT: I only asked	12:38:14
20	if she had an approach. I didn't	12:38:15
21	even ask what it was.	12:38:16
22	Q. Are you following your	12:38:19

1	counsel's instructions not to answer?	12:38:21
2	A. Of course. I live in fear	12:38:24
3	of her. Whatever she tells me to do, I'm	12:38:27
4	going to do.	12:38:30
5	Q. What is your policy on	12:38:33
6	speaking with the press about cases?	12:38:34
7	A. Our firm has a no-media	12:38:41
8	policy. If media calls our office, they	12:38:44
9	are dumped into a voicemail that is	12:38:46
10	frankly rarely checked. We do not speak	12:38:51
11	with media about our current or past	12:38:53
12	clients.	12:38:59
13	Q. And how long have you had	12:38:59
14	that policy in place?	12:39:03
15	A. From the inception of my	12:39:04
16	joining the firm.	12:39:09
17	Q. Have you ever spoken with	12:39:10
18	the press about a case you have?	12:39:13
19	MS. RICE: Objection. Not	12:39:17
20	relevant.	12:39:20
21	MR. PRESIADO: Same	12:39:26
22	objection.	12:39:27

1	A.	I can think of one or two	12:39:29
2		examples of cases where clients have	12:39:32
3		requested some explanation to media, and	12:39:35
4		after speaking with their publicist, I	12:39:40
5		have been able to give or assist with	12:39:44
6		quotes; but beyond that, no.	12:39:50
7	Q.	Did you ever speak with the	12:39:52
8		press in the Amber Heard, Johnny Depp	12:39:56
9		divorce?	12:40:02
10	A.	Not that I can recall.	12:40:02
11	Q.	Do you have a different	12:40:08
12		policy where you have a high profile	12:40:22
13		case?	12:40:25
14	MS. RICE:	Vague as to what	12:40:28
15		policy we're talking about.	12:40:29
16	MR. PRESIADO:	Objection.	12:40:31
17		Vague and ambiguous as to high	12:40:33
18		profile.	12:40:35
19	A.	I think also vague and	12:40:38
20		ambiguous as to policy. I'm not sure I	12:40:41
21		understand your question.	12:40:42
22	Q.	No press, no-media policy,	12:40:42

1 does that change or alter at all if 12:40:45
2 there's a high profile case versus not? 12:40:48
3 A. No. 12:40:50
4 Q. Does it change if there's a 12:40:50
5 domestic violence or abuse allegation? 12:40:52
6 A. No. 12:40:55
7 Q. When did you first begin 12:40:56
8 representing Mr. Depp relating to his 12:41:09
9 divorce with Amber Heard? 12:41:12
10 A. I believe it was in December 12:41:13
11 of 2015. 12:41:29
12 Q. And when were you first 12:41:29
13 contacted and by whom? 12:41:39
14 MS. RICE: Objection. Calls 12:41:42
15 for privileged information. 12:41:43
16 Instruct her not to answer. It's 12:41:45
17 also compound. 12:41:47
18 Q. I believe she's already 12:41:50
19 testified -- 12:41:52
20 MR. PRESIADO: Same 12:41:52
21 objection. 12:41:52
22 Q. Do you recall -- are you 12:41:55

1	following your counsel's instruction not	12:41:57
2	to answer that question?	12:41:58
3	A. I am.	12:41:59
4	Q. Do you recall when in	12:42:00
5	December 2015 you began representing	12:42:04
6	Mr. Depp?	12:42:08
7	A. No.	12:42:08
8	Q. Were you contacted by	12:42:09
9	someone on behalf of Mr. Depp before you	12:42:13
10	spoke with Mr. Depp?	12:42:16
11	MS. RICE: Assumes facts not	12:42:19
12	in evidence. Vague and ambiguous.	12:42:20
13	MR. PRESIADO: Same	12:42:23
14	objection.	12:42:24
15	A. I can't recall.	12:42:27
16	Q. Do you have a recollection	12:42:28
17	of speaking with either Jake Bloom or	12:42:30
18	Marty Singer before you spoke with	12:42:34
19	Mr. Depp?	12:42:36
20	MS. RICE: Assumes facts not	12:42:37
21	in evidence.	12:42:39
22	MR. PRESIADO: Same	12:42:40

1	objection.	12:42:41
2	A. No.	12:42:43
3	Q. Did you -- in December 2015,	12:42:43
4	did you have any type of relationship	12:42:49
5	with Jake Bloom or Marty Singer? And by	12:42:53
6	relationship, I'm talking about, you	12:42:56
7	know, collegial, friendship,	12:42:59
8	professional. The type where you would	12:43:03
9	refer clients to each other, communicate	12:43:05
10	with each other on some basis?	12:43:08
11	MS. RICE: The question --	12:43:11
12	MR. PRESIADO: Objection,	12:43:12
13	compound.	12:43:12
14	MS. RICE: That's about 14	12:43:13
15	questions imbedded in it, and it's	12:43:14
16	vague and ambiguous.	12:43:17
17	A. Yes.	
18	Q. How would you describe your	12:43:22
19	relationship with Jake Bloom as of	12:43:24
20	December 2015?	12:43:27
21	MR. PRESIADO: Objection,	12:43:30
22	relevance.	12:43:31

1	A. Jake Bloom was the named	12:43:36
2	partner at a law firm where my	12:43:41
3	ex-significant other used to practice.	12:43:48
4	We had collegial relationship. I don't	12:43:50
5	believe that Mr. Bloom has ever sent me a	12:43:54
6	client, if that's what you're asking.	12:43:57
7	Q. Did you have any type of	12:43:59
8	relationship with Marty Singer at that	12:44:01
9	time, using my definition from the	12:44:03
10	earlier question of relationship?	12:44:18
11	MR. PRESIADO: Objection.	12:44:21
12	Relevance and compound, if you're	12:44:23
13	using that past definition.	12:44:25
14	A. Yes.	12:44:29
15	Q. And how would you describe	12:44:29
16	your relationship with Marty Singer?	12:44:31
17	MR. PRESIADO: Same	12:44:36
18	objections.	12:44:36
19	MS. RICE: Relevance.	12:44:38
20	A. I've known Marty since I	12:44:40
21	started practicing. We have sent each	12:44:43
22	other clients. We have worked on cases	12:44:46

1	together.	12:44:48
2	Q. And is that up through the	12:44:49
3	present?	12:44:53
4	MS. RICE: Relevance.	12:44:55
5	MR. PRESIADO: Same	12:44:57
6	objection.	12:44:58
7	A. Yes.	12:45:00
8	Q. Mr. Depp testified that Jake	12:45:00
9	Bloom and Marty Singer were the people	12:45:09
10	who referred him to you.	12:45:11
11	Do you have any reason to	12:45:14
12	believe that's not correct?	12:45:15
13	MS. RICE: Objection.	12:45:17
14	Foundation. Assumes facts not in	12:45:18
15	evidence.	12:45:20
16	MR. PRESIADO: Same	12:45:22
17	objection. I'm sorry, Amy, did you	12:45:22
18	say foundation as well?	12:45:30
19	MS. RICE: Yes.	12:45:32
20	MR. PRESIADO: I join in	12:45:33
21	that.	12:45:34
22	A. I do not believe that is how	12:45:36

1 Mr. Depp came to be a client of the firm. 12:45:39

2 Q. How do you believe Mr. Depp 12:45:42

3 came to be a client of the firm? 12:45:44

4 MS. RICE: I'm instructing 12:45:48

5 you not to answer to the extent it 12:45:48

6 requires you to disclose 12:45:49

7 attorney/client privileged 12:45:54

8 communications. 12:45:54

9 MR. PRESIADO: Objection, 12:45:56

10 relevance. 12:45:58

11 A. Answering would necessitate 12:46:02

12 a relay of attorney/client privilege 12:46:04

13 information. 12:46:10

14 Q. So you are following your 12:46:11

15 counsel's instruction not to answer? 12:46:15

16 A. I am. 12:46:17

17 MS. RICE: Counsel, we can 12:46:18

18 have a stipulation she will follow 12:46:18

19 my instructions. 12:46:21

20 MS. BREDEHOFT: For all of 12:46:23

21 the answers in this deposition? 12:46:24

22 MS. RICE: Yes. 12:46:25

Transcript of Laura Allison Wasser, Corporate Designee
Conducted on December 16, 2020

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1	MS. BREDEHOFT: Okay. Thank	12:46:27
2	you.	12:46:29
3	Q. Had you represented Mr. Depp	12:46:29
4	in the past before December of 2015?	12:46:34
5	MS. RICE: Objection. Calls	12:46:39
6	for privileged information.	12:46:40
7	Violates Business and Professions	12:46:43
8	Code Section 6068E. You can	12:46:45
9	answer either yes or no, or you	12:46:47
10	don't remember.	12:46:50
11	MR. PRESIADO: Same	12:46:51
12	objections, plus relevance.	12:46:52
13	A. My answer is no.	12:46:54
14	Q. Had you ever represented	12:46:55
15	anyone in Mr. Depp's family prior to	12:46:59
16	December 2015?	12:47:03
17	MS. RICE: Same objections.	12:47:06
18	Same instruction and relevance.	12:47:07
19	MR. PRESIADO: Same	12:47:10
20	objections and privacy objection	12:47:11
21	as to third parties.	12:47:13
22	A. No.	12:47:16

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1	Q. Do you currently represent	12:47:16
2	Mr. Depp?	12:47:21
3	MS. RICE: Objection. Not	12:47:23
4	relevant. Intrudes upon the	12:47:25
5	attorney/client privilege.	12:47:28
6	Violates Business and Professions	12:47:29
7	Code Section 6068E. I'm going to	12:47:30
8	instruct her not to answer.	12:47:31
9	Actually, you can answer yes or	12:47:34
10	no. You can answer yes or no.	12:47:36
11	MR. PRESIADO: Objection.	12:47:37
12	A. No.	12:47:38
13	Q. When did your representation	12:47:38
14	of Mr. Depp end?	12:47:41
15	MR. PRESIADO: Same	12:47:47
16	objections, plus relevance.	12:47:48
17	A. Probably when the judgment	12:47:53
18	of dissolution was entered. My guess is	12:47:54
19	we filed a withdrawal as we generally do	12:47:57
20	when our cases are complete.	12:48:00
21	MR. PRESIADO: Also, if I	12:48:05
22	can add it calls for legal	12:48:05

1	conclusion objection for that last	12:48:07
2	question.	12:48:10
3	Q. Ms. Wasser, so I have that	12:48:11
4	judgment, and we'll talk about it in a	12:48:15
5	little bit. So whatever that date was	12:48:18
6	entered in the court then that would have	12:48:20
7	ended your representation of Mr. Depp; is	12:48:23
8	that what you're saying?	12:48:25
9	MS. RICE: Misstates the	12:48:26
10	witness' testimony.	12:48:27
11	MR. PRESIADO: Also	12:48:29
12	objection. Calls for a legal	12:48:30
13	conclusion. Relevance.	12:48:31
14	A. No. When a judgment is	12:48:37
15	entered, generally our firm will file a	12:48:41
16	notice of withdrawal, that's what you can	12:48:45
17	do, if they are not opposed, because our	12:48:47
18	work is generally done. I am not sure if	12:48:49
19	we did that in Mr. Depp's case. However,	12:48:51
20	given the fact that there are no pending	12:48:54
21	actions in the dissolution matter for	12:48:55
22	which we were hired, my testimony is that	12:48:57

1	I am not currently representing Mr. Depp.	12:49:00
2	Q. And that I think answers my	12:49:03
3	next question.	12:49:06
4	Since the time that the	12:49:07
5	judgment was entered, have you	12:49:08
6	represented Mr. Depp?	12:49:09
7	MR. PRESIADO: Objection.	12:49:13
8	Calls for a legal conclusion.	12:49:14
9	A. Not actively.	12:49:17
10	Q. Is there passive	12:49:19
11	representation?	12:49:22
12	A. Yes.	12:49:23
13	MR. PRESIADO: Objection.	12:49:26
14	Vague and ambiguous.	12:49:27
15	Q. I just want to know what do	12:49:30
16	you mean by not actively?	12:49:32
17	A. There's no pending matter,	12:49:34
18	so there's nothing for us to represent	12:49:36
19	him with regard to in the dissolution. I	12:49:39
20	understand that he has other litigation	12:49:42
21	going on. Our firm does not represent	12:49:45
22	him in any of those matters.	12:49:48

1 Q. Do you have a friend named 12:49:49
2 Megan Silverman? 12:49:55

3 A. No. 12:49:57

R;
IH;
AR

4 Q. Have you ever heard of Megan 12:49:59
5 Silverman? 12:50:02

6 A. Yes. I think she was an 12:50:03
7 agent at either CAA or WNV. 12:50:10

8 Q. Have you ever had any kind 12:50:14
9 of friendship or professional 12:50:16
10 relationship with Megan Silverman? 12:50:19

11 MS. RICE: Compound. 12:50:23

12 MR. PRESIADO: Same 12:50:24

13 objection. Relevance. Lacks 12:50:24

14 foundation. 12:50:28

R;
IH;
AR

15 A. If it's the Megan Silverman 12:50:28
16 I'm thinking about, I may have spoken 12:50:30
17 with her on the phone a couple of times. 12:50:32

18 Q. To your knowledge, has Megan 12:50:36
19 Silverman ever referred anyone to you? 12:50:38

20 A. Possibly. 12:50:42

21 Q. And if Megan Silverman had 12:50:44
22 referred anyone to you, would you have 12:50:48

R; IH; AR	1	given that referral any special attention	12:50:51
	2	for any reason?	12:50:54
	3	MS. RICE: Assumes facts not	12:50:55
	4	in evidence. Unintelligible.	12:50:56
	5	Incomplete hypothetical. Calls	12:50:58
	6	for speculation.	12:51:01
	7	MR. PRESIADO: Same	12:51:02
	8	objections.	12:51:03
R; IH; AR	9	A. We give all of our cases	12:51:04
	10	special attention regardless of the	12:51:06
	11	referral source.	12:51:10
	12	Q. Now, Megan Silverman	12:51:11
	13	referred Amber Heard to you prior to	12:51:13
	14	December of 2015, are you aware of that?	12:51:17
	15	A. No.	12:51:21
	16	MS. RICE: Assumes facts not	12:51:21
	17	in evidence. Lacks foundation.	12:51:22
	18	Completely irrelevant.	12:51:26
	19	MR. PRESIADO: Same	12:51:27
	20	objection.	12:51:28
	21	Q. I think you already answered	12:51:31
	22	no, didn't you, Ms. Wasser?	12:51:33

1	A. Yes.	12:51:35
2	Q. Were you aware that Amber	12:51:35
3	Heard reached out to you several times	12:51:37
4	and left you messages?	12:51:40
5	MS. RICE: Relevance.	12:51:43
6	MR. PRESIADO: Same	12:51:45
7	objection.	12:51:46
8	A. I don't believe that to be	12:51:48
9	the case.	12:51:50
10	Q. I take it, since you don't	12:51:50
11	believe that to be the case, then you	12:51:56
12	don't recall what was said in those	12:51:57
13	messages left for you by Amber Heard?	12:51:59
14	MS. RICE: No foundation.	12:52:01
15	Assumes facts not in evidence.	12:52:03
16	MR. PRESIADO: Same	12:52:06
17	objection.	12:52:07
18	A. I don't believe that our	12:52:09
19	office ever received messages from Amber	12:52:11
20	Heard.	12:52:14
21	Q. Do you recall ever returning	12:52:16
22	Amber Heard's telephone call and	12:52:20

Transcript of Laura Allison Wasser, Corporate Designee
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1	messages?	12:52:25
2	MS. RICE: Assumes a fact	12:52:26
3	not in evidence. Lacks	12:52:27
4	foundation.	12:52:28
5	MR. PRESIADO: Same	12:52:29
6	objection.	12:52:29
7	A. I do not.	12:52:33
8	Q. Do you recall ever speaking	12:52:34
9	with Megan Silverman about Amber Heard?	12:52:35
10	A. I do not.	12:52:43
11	Q. What is your conflict policy	12:52:45
12	at your firm? How do you handle	12:52:49
13	conflicts?	12:52:51
14	MS. RICE: Objection. I'm	12:52:52
15	going to instruct her not to	12:52:52
16	answer. This is so beyond the	12:52:53
17	call of this deposition. It	12:52:55
18	intrudes upon the firm's privacy	12:52:59
19	interest in connection with its	12:53:02
20	internal policies. It's rising	12:53:03
21	now to the level of harassment.	12:53:07
22	MR. PRESIADO: Objection,	12:53:12

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1	relevance.	12:53:13
2	THE WITNESS: Did you	12:53:19
3	instruct me not to answer?	12:53:19
4	MS. RICE: I did.	12:53:21
5	MS. BREDEHOFT: On what	12:53:23
6	basis did you instruct her not to	12:53:24
7	answer?	12:53:27
8	MS. RICE: Harassment.	12:53:27
9	MS. BREDEHOFT: I just	12:53:32
10	raised a series of questions about	12:53:33
11	Amber Heard contacting her, and	12:53:36
12	then I asked for the conflicts	12:53:37
13	also. How do you see that as	12:53:39
14	harassment? I'd like you to	12:53:41
15	articulate that on the record,	12:53:43
16	please.	12:53:44
17	MS. RICE: I view the entire	12:53:44
18	line of questioning as harassment.	12:53:45
19	I gave you some leeway. I'm	12:53:46
20	cutting it off. Please move on.	12:53:48
21	Q. Do you ordinarily	12:53:52
22	communicate with perspective clients even	12:53:56

1	to let them know if you believe you have	12:53:59
2	a conflict?	12:54:02
3	MS. RICE: Objection. It's	12:54:03
4	unintelligible as phrased. It	12:54:04
5	would call for the privileged	12:54:07
6	communications with perspective	12:54:11
7	clients. It's vague as to time.	12:54:13
8	And with respect to privilege,	12:54:14
9	I'll instruct her not to answer.	12:54:16
10	MR. PRESIADO: Same	12:54:19
11	objection.	12:54:19
12	A. With respect to everything	12:54:22
13	but privilege, my answer is no. They	12:54:23
14	speak with an assistant who screens them	12:54:28
15	beforehand.	12:54:32
16	Q. Okay. So typically you	12:54:33
17	would contact any perspective client,	12:54:38
18	your firm would, I'm not saying you	12:54:43
19	would, but your firm would at least	12:54:45
20	screen for conflicts; is that correct?	12:54:48
21	MS. RICE: Question is	12:54:50
22	unintelligible as phrased.	12:54:52

Transcript of Laura Allison Wasser, Corporate Designee
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1 A. I think you asked two 12:54:54
2 questions. We would not contact anyone. 12:54:55
3 If they contact us and there's a 12:54:57
4 conflict, we generally will not return 12:55:00
5 the call. We don't tell them there's a 12:55:02
6 conflict. Not because we have any 12:55:04
7 obligation to them, since they're not our 12:55:07
8 clients, we just think that's the right 12:55:09
9 thing to do. 12:55:11

R;
SP;
IH;
IU

10 Q. Are you aware of any 12:55:12
11 conflict you would have had in 12:55:15
12 representing Amber Heard prior to 12:55:18
13 December 2015? 12:55:21

14 MS. RICE: Unintelligible as 12:55:23
15 phrased. 12:55:24

16 MR. PRESIADO: Objection. 12:55:25

17 MS. RICE: Calls for 12:55:26
18 speculation. Irrelevant. 12:55:27

19 MR. PRESIADO: Objection, 12:55:30
20 relevance. 12:55:35

21 A. It wouldn't have been -- 12:55:34

22 MS. RICE: And assumes a 12:55:35

1 fact not in evidence, that she 12:55:36

2 contacted the firm. 12:55:37

R; 3 A. It wouldn't have been a 12:55:40

SP; 4 professional conflict, no. 12:55:41

IH; 5 Q. Would there have been a 12:55:43

IU 6 personal conflict? 12:55:45

7 A. Yes. 12:55:46

8 Q. In what way? 12:55:48

9 A. I have known Mr. Depp for 12:55:49

10 years. We are not close. We are not 12:55:55

11 friends. We have mutual friends. If 12:55:57

12 Amber Heard had called our office, it is 12:56:01

13 unlikely I would have taken the case 12:56:04

14 notwithstanding any professional 12:56:06

15 relationship that I had with Mr. Depp. 12:56:07

16 Q. Did you take any action on 12:56:10

17 behalf of Mr. Depp between December 2015 12:56:22

18 and May 21, 2016, in connection with 12:56:27

19 proceeding with any kind of divorce 12:56:33

20 action against Amber Heard? 12:56:35

21 MS. RICE: Instruct the 12:56:37

22 witness not to answer on the 12:56:38

1	grounds of attorney/client	12:56:40
2	privilege, attorney work product	12:56:41
3	doctrine, Business and Professions	12:56:42
4	Code Section 6068E.	12:56:43
5	MR. PRESIADO: Same	12:56:47
6	objections, plus vague and	12:56:47
7	ambiguous.	
8	MS. BREDEHOFT: I'm sorry,	12:56:52
9	you instructed her not to answer;	12:56:52
10	is that correct? I don't have to	12:56:54
11	ask her if she is following	12:56:54
12	because we have stipulated. So	12:56:56
13	let me then ask the next question.	12:56:57
14	Q. Had you, up to May 21, 2016,	12:56:59
15	entered your appearance in any manner on	12:57:05
16	behalf of Mr. Depp, such that it would be	12:57:09
17	public knowledge that you were	12:57:14
18	representing Mr. Depp?	12:57:16
19	MR. PRESIADO: Objection.	12:57:21
20	Vague and ambiguous and compound.	12:57:22
21	MS. RICE: Irrelevant.	12:57:22
22	MR. PRESIADO: That too.	12:57:24

1	A. I'm not sure what you mean	12:57:26
2	about entered my appearance. Did I make	12:57:28
3	an appearance in a court proceeding?	12:57:30
4	Q. Did you make anyone aware of	12:57:34
5	your representation of Mr. Depp, such	12:57:41
6	that it would have been public	12:57:45
7	information that you were representing	12:57:47
8	Mr. Depp; that could include a letter, an	12:57:49
9	e-mail, a telephone call, any kind of	12:57:53
10	communication with someone else?	12:57:56
11	MS. RICE: Question is	12:58:00
12	unintelligible as phrased. It's	12:58:01
13	not relevant, and would also	12:58:02
14	intrude upon the attorney/client	12:58:07
15	privilege since you have not	12:58:07
16	limited it to lawyers representing	12:58:08
17	Mr. Depp as an example or his	12:58:12
18	agents. So to that extent, I	12:58:15
19	would -- it's also vague and	12:58:17
20	ambiguous and not relevant.	12:58:19
21	MR. PRESIADO: Same	12:58:21
22	objections.	12:58:22

1	A. I'm afraid I don't	12:58:25
2	understand your question actually.	12:58:27
3	Q. Between the time that you	12:58:28
4	say that you started representing	12:58:34
5	Mr. Depp, which you indicated you believe	12:58:35
6	was December 2015 and May 21, 2016, at	12:58:37
7	any time, had you made public in any	12:58:44
8	manner that you represented Mr. Depp?	12:58:49
9	And by made public, I mean that you	12:58:52
10	communicated with someone outside of your	12:58:55
11	firm and your representation, such as,	12:59:00
12	opposing counsel, or, you know, someone	12:59:04
13	else in any kind of public manner that	12:59:08
14	would no longer make it privileged that	12:59:11
15	you were, in fact, representing him. Do	12:59:14
16	you understand my question now, or do I	12:59:17
17	need to rephrase that?	12:59:18
18	MS. RICE: Vague and	12:59:20
19	ambiguous. Irrelevant.	12:59:22
20	MR. PRESIADO: Same	12:59:22
21	objections plus compound.	12:59:23
22	A. I don't believe so, no.	12:59:26

1 MS. BREDEHOFT: I'm going to 12:59:30
2 ask you to pull up Document 1, 12:59:31
3 Wasser Document 1. Let's go ahead 12:59:35
4 and label that as Wasser Exhibit 12:59:38
5 number 1. 12:59:40

R

6 (Wasser Exhibit 1 document
7 was marked for identification, as
8 of this date December 16, 2020.) 13:00:00
9 MS. BREDEHOFT: Thank you, 13:00:00
10 Alan. Can I take control? Thank 13:00:01
11 you. 13:00:10

12 Q. Ms. Wasser, I'm going to ask 13:00:12
13 you to take a look at what has been 13:00:14
14 marked as Wasser Deposition Exhibit 13:00:15
15 number 1. It is a letter dated May 24, 13:00:18
16 2016. It's addressed to Jacob Bloom, and 13:00:23
17 it says re: In remarriage of Depp; do you 13:00:28
18 see that? 13:00:31

19 A. Yes. 13:00:32

20 Q. And it's from Samantha 13:00:34
21 Spector, who indicates she's representing 13:00:38
22 Amber Heard. 13:00:40

1 At the time of this letter, 13:00:43
2 had you made known to Amber Heard or 13:00:46
3 Ms. Spector or anyone else related to 13:00:50
4 them that you represented Mr. Depp? 13:00:54
5 A. I don't believe so. 13:00:57
6 Q. Did you understand that at 13:01:02
7 the time of this letter May 24, 2016, 13:01:04
8 Jacob Bloom represented Mr. Depp, he was 13:01:09
9 counsel for him? 13:01:14
10 MR. PRESIADO: Objection. 13:01:16
11 Lacks foundation. 13:01:17
12 MS. RICE: What was the last 13:01:17
13 part of the question? 13:01:18
14 (The record is read back by
15 the reporter.) 13:01:19
16 A. My answer is yes. 13:01:19
FSPK 17 Q. Did you receive a copy of 13:01:43
18 this letter from someone? 13:01:48
19 A. I believe so. I think I've 13:01:53
20 seen it before, so yes. 13:01:56
21 Q. Do you know how soon you 13:01:58
22 received this letter after -- on or after 13:02:02

1 May 24, 2016? Let me ask that 13:02:06
2 differently. 13:02:09

R 3 Did you receive this letter 13:02:10
4 on or around May 24, 2016? 13:02:12

5 MS. RICE: Relevance. 13:02:16

6 MR. PRESIADO: Same 13:02:19

7 objection. 13:02:19

8 A. Would you mind scrolling 13:02:21

9 down? Hang on. 13:02:23

10 Q. I was going to say, let me 13:02:33

11 know if I'm going too fast, but you did. 13:02:37

R 12 A. Okay, next page, please. 13:02:47

13 Hang on. Yes, it was around that time. 13:02:58

14 Q. Around May 24, 2016? 13:03:04

15 A. Yes. 13:03:08

16 Q. Did you have any 13:03:10

17 communications with Samantha Spector in 13:03:12

18 connection with this letter? 13:03:17

19 A. Yes. 13:03:18

20 Q. When? 13:03:21

21 MS. RICE: Relevance. 13:03:25

22 MR. PRESIADO: Same 13:03:27

1 objection. 13:03:28

2 A. Within days of May 24th. I 13:03:33

3 was out of state. I do remember having a 13:03:36

4 conversation with Ms. Spector right 13:03:39

5 around then. 13:03:40

R 6 Q. And when you say within 13:03:41

7 days, could it have been the same day May 13:03:44

8 24th, the next day 25th? 13:03:47

9 A. Possibly. 13:03:49

10 Q. You said you were out of 13:03:51

11 state; do you recall where you were? 13:03:54

12 A. I was in Florida. 13:03:55

R, H, F 13 Q. What do you recall of your 13:04:00

14 first communication with Samantha Spector 13:04:08

15 after receiving a copy of this letter? 13:04:10

R 16 MS. RICE: Counsel, this is 13:04:13

17 so irrelevant. Are we going to go 13:04:14

18 through every communication over 13:04:17

19 the six months of the dissolution 13:04:18

20 case? I was under the impression 13:04:21

21 that these parties settled the 13:04:23

22 dissolution. I think that this is 13:04:25

R, H, F	1	bordering on harassment. Has	13:04:26
	2	nothing to do with the civil	13:04:29
	3	action in which you're	13:04:30
	4	representing Ms. Heard. Can we	13:04:31
	5	please move on to something that	13:04:33
	6	at least has some semblance of	13:04:35
	7	relevance?	13:04:38
	8	MR. PRESIADO: Objection,	13:04:40
	9	relevance.	13:04:41
	10	Is there a question pending?	13:04:51
	11	THE WITNESS: Can you repeat	
	12	it, madam court reporter?	13:05:09
	13	(The record is read back by	13:05:09
	14	the reporter.)	
	15	MR. PRESIADO: Objection to	13:05:13
	16	the extent it calls for hearsay as	13:05:13
	17	well.	13:05:14
	18	A. I believe I spoke with	13:05:19
	19	Ms. Spector and -- who had kind of	13:05:20
	20	developed a reputation of making	13:05:25
	21	allegations regarding domestic violence,	13:05:28
	22	particularly if she could retain high	13:05:33

R, H, F 1 profile either clients or more often 13:05:37
2 people who had been somehow associated 13:05:44
3 with high profile clients, and trying to 13:05:47
4 figure out a way to resolve things prior 13:05:50
5 to or going to the media and publicly to 13:05:54
6 court, which has generally been her MO. 13:06:00

7 MS. BREDEHOFT: I'm going to 13:06:16
8 move to strike as nonresponsive. 13:06:17

R, H, F 9 Q. But then I'm going to ask 13:06:20
10 you some questions. 13:06:21
11 You indicated that the 13:06:22
12 reputation -- that Samantha Spector had a 13:06:25
13 reputation of making allegations of 13:06:28
14 domestic violence trying to retain high 13:06:31
15 profile clients. 13:06:33

16 On what facts do you base 13:06:34
17 your claim that Samantha Spector had 13:06:44
18 developed a reputation of making 13:06:47
19 allegations of domestic violence in 13:06:49
20 trying to represent high profile clients? 13:06:52

21 MS. RICE: Relevance. 13:06:56

22 A. The facts are that pretty 13:07:06

R, H, F 1 much any case we've had at our firm where 13:07:09
2 Samantha Spector has been on the other 13:07:13
3 side and represented a female, she has 13:07:15
4 led with an allegation of domestic 13:07:22
5 violence. There have also been many 13:07:28
6 other of our colleagues who have 13:07:29
7 privately and publicly made this 13:07:34
8 assertion. 13:07:36

9 Q. Let's start with at your 13:07:38
10 firm. 13:07:48

11 Who at your firm has had 13:07:49
12 cases with Samantha Spector prior to this 13:07:51
13 May 24, 2016 letter in which she has 13:07:54
14 represented a female and led with 13:08:00
15 allegations of domestic violence and 13:08:02
16 abuse? 13:08:05

17 MS. RICE: Relevance. 13:08:05

18 A. Our firm functions as a 13:08:09
19 whole. So to say, who at your firm, 13:08:11
20 doesn't really work. Our firm -- all 16 13:08:13
21 of the attorneys at our firm, work on 13:08:15
22 cases together. And I'm not willing to 13:08:18

1 mention the name of any other cases where 13:08:22
2 this has happened. 13:08:25

3 Q. So you're not able to give 13:08:26
4 me any examples of where Samantha Spector 13:08:29
5 has led in representing females with 13:08:34
6 allegations of domestic violence with 13:08:39
7 your firm; is that correct? 13:08:41

8 MS. RICE: Misstates the 13:08:43
9 witness' testimony. Not relevant. 13:08:44

10 MR. PRESIADO: Objection. 13:08:46
11 Same plus vague and ambiguous. 13:08:47

12 A. I'm able, but I'm not 13:08:49
13 willing, because we have a duty to our 13:08:51
14 clients. 13:08:53

R,H,F 15 Q. Alright. Now, you also said 13:08:55
16 many other of your colleagues privately 13:08:57
17 and publically have made this statement; 13:09:00
18 who are the colleagues who have made this 13:09:03
19 statement? 13:09:05

20 MS. RICE: Relevance. 13:09:06

21 A. I think that, Elaine, if you 13:09:14
22 got a roster of the Beverly Hills bar 13:09:16

R,H,F 1 association family law section, and you 13:09:19
2 went down it, I would imagine that about 13:09:21
3 95 percent of the people on that roster, 13:09:23
4 including members of the executive 13:09:26
5 committee of which I am also a member, 13:09:29
6 would say that that is Ms. Spector's 13:09:30
7 reputation. 13:09:33
8 Q. Can you give me any names, 13:09:33
9 please? 13:09:42
10 A. I can, but I'm not willing 13:09:42
11 to at this deposition today. 13:09:48
12 Q. So is it fair to say that 13:09:49
13 you are not willing to give me any facts 13:09:53
14 that would support your statement that 13:09:57
15 Samantha Spector, as of the time of this 13:09:59
16 May 24, 2016 letter, has a reputation of 13:10:02
17 making allegations of domestic violence 13:10:06
18 to get high profile clients, and that she 13:10:10
19 has led in representing females with 13:10:13
20 allegations of domestic violence; is that 13:10:18
21 correct? 13:10:20
22 MS. RICE: Relevance. 13:10:20

1	MR. PRESIADO: Objection.	13:10:23
2	Misstates testimony and compound.	13:10:23
3	A. I think that if you change	13:10:28
4	the word able to willing, that would be a	13:10:29
5	correct statement.	13:10:31
6	Q. I think I said willing.	13:10:32
7	A. I think you said able.	13:10:34
8	MS. BREDEHOFT: Could you	13:10:36
9	read back my question?	13:10:36
10	(The record is read back by	
11	the reporter.)	13:11:10
12	A. My apologizes, you did say	13:11:10
13	willing. So what I am not willing to	13:11:12
14	give you is names. I believe that I've	13:11:14
15	given you the facts. Not able to -- not	13:11:15
16	willing to connect them with names of our	13:11:19
17	colleagues or our clients.	13:11:21
18	Q. What you consider to be	13:11:23
19	facts are making statements without	13:11:27
20	identifying anyone; is that fair to say?	13:11:30
21	MS. RICE: Argumentative.	13:11:33
22	Irrelevant. We're now bordering	13:11:34

1	on harassment. Move on to	13:11:36
2	something that is at least	13:11:38
3	arguably relevant to this case in	13:11:39
4	which you claim to be representing	13:11:42
5	Amber Heard.	13:11:43
6	MR. PRESIADO: Same	13:11:46
7	objections.	13:11:46
8	MS. RICE: Can we take down	
9	Exhibit 1, please?	
10	MS. BREDEHOFT: No.	13:11:54
11	Q. Do you remember the	13:11:54
12	question?	13:11:55
13	A. No.	13:11:57
14	MS. BREDEHOFT: Can you read	
15	it back, please?	
16	(The record is read back by	
17	the reporter.)	13:12:16
18	MS. RICE: The question is	13:12:16
19	vague and ambiguous also.	13:12:16
20	----- MR. PRESIADO: Same	13:12:28
21	objection.	13:12:29
22	A. I'm sorry, I don't	13:12:31

1	understand what your question is.	13:12:32
2	Q. I asked you for the facts	13:12:33
3	supporting your allegations that Samantha	13:12:38
4	Spector, at the time of this letter May	13:12:41
5	24, 2016, had a reputation of making	13:12:44
6	allegations of domestic violence, trying	13:12:48
7	to attract high profile clients, and led,	13:12:51
8	when she represented females, with claims	13:12:54
9	of domestic violence and abuse. You	13:12:56
10	indicated two things that you had had	13:12:59
11	occasions where she had done that with	13:13:03
12	your firm. Then you also said that you	13:13:05
13	had many other colleagues who both	13:13:08
14	privately and publicly would say that.	13:13:11
15	And if I went down the roster of the	13:13:13
16	family law group in Beverly Hills, of	13:13:15
17	which you are on the executive committee,	13:13:19
18	they -- most of them would say it as	13:13:22
19	well.	13:13:24
20	I'm trying to just close the	13:13:24
21	gap here. You're not willing to give me	13:13:27
22	the names of any of the lawyers who have	13:13:29

1 come out privately or publicly, and 13:13:32
2 you're not willing to give me any 13:13:34
3 examples from your firm of any times that 13:13:37
4 Samantha Spector has represented anybody; 13:13:40
5 is that correct? 13:13:44
6 A. That is correct. 13:13:44
7 MR. PRESIADO: Objection, 13:13:45
8 compound. 13:13:46
9 Q. And so is there any facts 13:13:46
10 you are willing to give me that would be 13:13:49
11 able to identify such that we could 13:13:52
12 investigate the veracity of them that 13:13:56
13 Samantha Spector had a reputation of 13:13:58
14 making allegations of domestic violence 13:14:01
15 to attract high profile clients, and that 13:14:04
16 she had led in many cases with your firm 13:14:08
17 by alleging when she had represented a 13:14:12
18 female, a domestic violence or abuse? 13:14:16
19 MS. RICE: Objection. Not 13:14:18
20 relevant. 13:14:19
21 MR. PRESIADO: Same 13:14:22
22 objection. 13:14:22

1	not arrange for Johnny to have been	13:15:55
2	personally served at last nights movie	13:15:58
3	premiere; do you see that?	13:16:02
4	A. I do.	13:16:03
5	Q. What was your understanding	13:16:04
6	of what a CLETS DVTR0 was in this	13:16:07
7	context?	13:16:12
8	MS. RICE: Objection. Calls	13:16:13
9	for attorney work product. It's	13:16:14
10	not relevant. I'm going to	13:16:17
11	instruct her not to answer on the	13:16:19
12	grounds of the attorney work	
13	product doctrine, and to the	13:16:21
14	extent it would require her to	13:16:22
15	divulge attorney/client privilege	13:16:31
16	communications.	13:16:32
17	MR. PRESIADO: Same	13:16:35
18	objections.	13:16:36
19	MS. BREDEHOFT: Could you	13:16:44
20	please state the basis for your	13:16:44
21	work product objection on the	13:16:46
22	record?	13:16:47

Transcript of Laura Allison Wasser, Corporate Designee
Conducted on December 16, 2020

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1	MS. RICE: Work product is	13:16:48
2	codified in California and the	13:16:51
3	California code of civil procedure	13:16:53
4	I would direct you to that.	13:16:54
5	MS. BREDEHOFT: I'm asking	13:16:57
6	for your understanding of work	13:16:58
7	product in interposing an	13:16:59
8	objection instructing her not to	13:17:01
9	answer on the basis of work	13:17:03
10	product.	13:17:05
11	MS. RICE: My understanding	13:17:06
12	of work product is not relevant.	13:17:06
13	MS. BREDEHOFT: But you're	13:17:12
14	instructing her not to answer that	13:17:13
15	question.	13:17:14
16	MS. RICE: I did. It's also	13:17:15
17	not relevant.	13:17:25
18	MS. BREDEHOFT: You've	13:17:26
19	interposed -- Ms. Rice, I really	13:17:26
20	don't like to engage with counsel	13:17:27
21	on taking this deposition. But	13:17:29
22	you've interposed relevance all	13:17:30

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1 the way through. Relevance is 13:17:32
2 always subject to the judge's 13:17:34
3 determination, and it does not 13:17:36
4 need to be stated. Also, you do 13:17:37
5 not -- you're not involved in this 13:17:40
6 litigation other than representing 13:17:41
7 Ms. Wasser. I don't think you can 13:17:45
8 put yourself in a judge's position 13:17:47
9 and decide what you think is 13:17:49
10 relevant and what is not. I think 13:17:50
11 it's an improper objection and 13:17:51
12 just a waste of space and time. I 13:17:53
13 would ask you to be more 13:17:55
14 respectful of this process. 13:17:58
15 Ms. Heard has been sued by 13:17:59
16 Mr. Depp. I am entitled to take 13:18:01
17 this deposition. I'm entitled to 13:18:03
18 take depositions, and I'm trying 13:18:04
19 to do it in a professional manner 13:18:06
20 so that we could move quickly. 13:18:08
21 Frankly, I think we would have 13:18:09
22 been done by now without all of 13:18:11

1	the interposing and objections.	13:18:13
2	And I'm going to have to come	13:18:14
3	back, because of all the	13:18:16
4	instructions not to answer that	13:18:17
5	are inappropriate in Virginia law.	13:18:19
6	But I would just ask you to really	13:18:21
7	think about it before you keep	13:18:23
8	doing this, because it's just	13:18:25
9	going to require Ms. Wasser to	13:18:26
10	come back, and I don't think any	13:18:27
11	of us [inaudible].	13:18:29
12	MS. RICE: Counsel, you're	13:18:31
13	making speeches as yourself. I'm	13:18:32
14	making legal objections. I'm not	13:18:35
15	interfering with the conduct of	13:18:36
16	this deposition. As far as I can	13:18:38
17	tell, you've asked maybe three	13:18:40
18	questions that are relevant to the	13:18:41
19	lawsuit in which Ms. Wasser is now	13:18:45
20	being deposed, so please move on.	13:18:46
21	Q. Ms. Wasser, when you	13:18:50
22	received this letter that is Wasser	13:19:19

1 deposition Exhibit number 1, what did you 13:19:22
2 think Ms. Spector meant by quote, she has 13:19:28
3 not yet sought a CLETS DVTR0, end of 13:19:33
4 quote? 13:19:37

5 MR. PRESIADO: Objection; 13:19:39
6 calls for speculation. 13:19:40

7 MS. RICE: Join. It's also 13:19:42
8 not relevant. 13:19:43

9 A. I thought she meant that 13:19:48
10 unless we receive a large attorney fee 13:19:50
11 contribution, we're going to be appearing 13:19:55
12 in court and making Ms. Heard's 13:19:57
13 allegations public. That's what I 13:20:01
14 thought she meant. 13:20:02

15 MS. RICE: Move to strike 13:20:06
16 the witness has not answered, 13:20:06
17 because she disclosed her 13:20:07
18 opinions, conclusions, and 13:20:11
19 thoughts regarding the matter, 13:20:12
20 which is attorney work product. 13:20:13

21 Q. Why did you --

22 MS. RICE: I'm going to

1	instruct you that you should not	
2	disclose your impressions,	13:20:23
3	conclusions, analyses and thoughts	13:20:24
4	regarding your representation of	13:20:27
5	Mr. Depp in the dissolution of	13:20:30
6	marriage action.	13:20:32
7	THE WITNESS: Okay.	13:20:35
8	Q. Why did you think that,	13:20:36
9	Ms. Wasser?	13:20:39
10	MS. RICE: Move to strike.	13:20:41
11	Excuse me, I'm going to instruct	13:20:42
12	her not to answer on the grounds	13:20:44
13	that it invades the attorney work	13:20:45
14	product doctrine.	13:20:49
15	Q. Sorry, you're declining to	13:20:55
16	answer?	13:20:57
17	A. I am.	13:20:57
18	MS. RICE: Also, we have a	13:20:59
19	stipulation that she is following	13:21:00
20	my instructions.	13:21:01
21	MS. BREDEHOFT: I still have	13:21:03
22	to find out if she's declining to	13:21:04

1 answer even though the 13:21:07
2 stipulation -- 13:21:07
3 MS. RICE: Counsel, we have 13:21:07
4 a stipulation that she is not 13:21:08
5 going to answer any question she's 13:21:08
6 been instructed not to answer. 13:21:10
7 You don't need to keep asking that 13:21:11
8 question, please. 13:21:12
9 Q. Do you know whether there 13:21:17
10 was -- Johnny Depp was at a movie 13:21:21
11 premiere the night before? 13:21:26
12 MS. RICE: To the extent 13:21:28
13 that would require you to disclose 13:21:29
14 attorney/client privilege 13:21:30
15 communications, you're instructed 13:21:31
16 not to answer. 13:21:33
17 MR. PRESIADO: Same 13:21:36
18 objection. 13:21:36
19 A. Can't answer that question 13:21:39
20 as it would be a breach of the 13:21:40
21 attorney/client privilege. 13:21:45
22 Q. You have indicated -- 13:21:46

1 MS. BREDEHOFT: Sorry, let
2 me strike that.

R;
H;
SP

3 Q. I'm going to direct your 13:21:51
4 attention to the next paragraph. It 13:21:53
5 says, to this end please have Johnny 13:21:54
6 promptly sign and return by Friday, May 13:21:56
7 27, 2016, the enclosed notice of 13:22:00
8 acknowledgement receipt form confirming 13:22:02
9 service of the summons petition law case 13:22:06
10 cover sheet and blank response. 13:22:08

11 Did you do that? 13:22:09

12 A. This letter was not directed 13:22:10
13 to me, Elaine. 13:22:17

14 Q. No, I understand, but it was 13:22:18
15 given to you, correct? 13:22:21

16 A. I believe so. 13:22:22

17 Q. And you were representing 13:22:25
18 Mr. Depp, correct? 13:22:27

19 A. Yes. 13:22:28

20 Q. And Mr. Bloom did not 13:22:30
21 represent Mr. Depp in connection with the 13:22:33
22 divorce, correct? 13:22:39

1 A. Correct. 13:22:40

2 Q. So once Mr. Bloom gave this 13:22:40

3 to you, then did you represent Mr. Depp 13:22:44

4 going forward in communication with 13:22:49

5 Samantha Spector? 13:22:51

6 MS. RICE: Assumes facts not 13:22:53

7 in evidence as to Mr. Bloom doing 13:22:54

8 anything. 13:22:56

9 MR. PRESIADO: Same 13:22:58

10 objection. 13:22:59

11 A. Once we received this 13:23:00

12 letter, our firm took over with 13:23:02

13 representation of Mr. Depp in the 13:23:06

14 dissolution action. I cannot recall 13:23:08

15 whether or not the request made was done 13:23:12

16 by Friday, May 27, but I believe that it 13:23:17

17 was. Probably got that notice and 13:23:21

18 acknowledgement of receipt somewhere with 13:23:25

19 the date on it. 13:23:28

20 Q. Alright. Thank you.

R; H; 21 Now, the next section, I 13:23:28

SP; 22 think is something that you referred to 13:23:30

FSPK; IU

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R; H; 1 earlier. It said, in addition we are 13:23:31
SP; 2 requesting on Amber's behalf the 13:23:33
FSPK; 3 following: And it talks -- it says, 13:23:35
IU 4 appropriate pendente lite support. 13:23:38
5 Did you have an 13:23:41
6 understanding of what that amount might 13:23:43
7 be at the time that you saw this letter? 13:23:44

8 MS. RICE: Calls for 13:23:47
9 speculation as phrased. Assumes 13:23:48
10 facts not in evidence. 13:23:51
11 MR. PRESIADO: Join. 13:23:54

R; H; 12 A. I did not have an 13:23:56
SP; 13 understanding of what appropriate 13:23:58
FSPK; 14 pendente lite support would be at that 13:23:59
IU 15 time. 13:24:02
16 Q. Did you ask Samantha 13:24:02
17 Spector? 13:24:04

18 MS. RICE: Relevance. 13:24:06

R; H; 19 A. I don't recall. 13:24:09
SP; 20 Q. And then it said, exclusive 13:24:10
FSPK; 21 use and possession of the black Range 13:24:13
IU 22 Rover, the vehicle she's currently 13:24:16

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R; H; SP; FSPK; IU	1	driving, with Johnny to continue making	13:24:17
	2	all payments and encumbrances.	13:24:19
	3	Did you have any issue with	13:24:22
	4	that at the time?	13:24:24
	5	MS. RICE: Objection. Calls	13:24:26
	6	for --	
	7	MR. PRESIADO: Objection.	
R; H; SP; FSPK; IU	8	MS. RICE: -- attorney work	13:24:30
	9	product as phrased. Instruct her	13:24:30
	10	not to answer.	13:24:33
	11	MR. PRESIADO: Same	13:24:34
	12	objection. Go ahead, Amy, I'm	13:24:35
	13	sorry.	13:24:38
	14	MS. RICE: It's also not	13:24:38
	15	relevant.	13:24:40
	16	MR. PRESIADO: Same	13:24:41
	17	objection.	13:24:42
	18	MS. BREDEHOFT: I'm sorry,	
	19	you're instructing her not to	13:24:46
	20	answer?	13:24:47
	21	MS. RICE: Yes.	13:24:48
	22	MS. BREDEHOFT: On the basis	13:24:49

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1 of what? 13:24:50

2 MS. RICE: Attorney work 13:24:51

3 product doctrine. 13:24:54

R; 4 Q. And you're declining to 13:24:57

AR; 5 answer, is that correct, Ms. Wasser? 13:24:58

ICD

6 A. That is correct. 13:25:00

7 Q. Then I take it you wouldn't 13:25:01

8 be answering the next one either. If you 13:25:03

9 have any attorney/client privilege or 13:25:05

10 attorney work product on whether you took 13:25:06

11 issue with free exclusive use and 13:25:09

12 possession of 849 South Padre 13:25:15

13 (inaudible)? 13:25:15

14 MS. RICE: Same objection. 13:25:16

15 Same instruction. 13:25:17

16 MR. PRESIADO: Same 13:25:19

17 objections plus compound. 13:25:21

R; 18 Q. You're not answering, right? 13:25:25

AR; 19 A. Correct. 13:25:27

ICD

20 MS. RICE: My goodness, 13:25:28

21 counsel, I thought we had a 13:25:29

22 stipulation. 13:25:30

R;
IU

1 Q. And then the last one says, 13:25:32
2 the contribution towards a reasonable and 13:25:33
3 necessary attorneys fees in the amount of
4 \$100,000 and \$25,000 for forensic 13:25:37
5 accounting cost to be paid to my firm by 13:25:41
6 close of business on May 27, 2016. 13:25:43
7 Is that the provision you 13:25:47
8 were referring to earlier up in the 13:25:49
9 section when I was addressing over here 13:25:51
10 on the CLETS DVTR0? 13:25:54

11 MS. RICE: Question is 13:25:58
12 unintelligible. 13:25:59

13 MR. PRESIADO: Same 13:26:01
14 objection, plus compound. 13:26:01

R;
IU

15 A. I don't believe so, no. 13:26:06
16 Q. What, if any, communications 13:26:08
17 would you have with Samantha Spector 13:26:18
18 about these specific terms, and I'm 13:26:21
19 referring to those in the last paragraph 13:26:26
20 of the first page going into the end of 13:26:29
21 the first paragraph of the second page of 13:26:32
22 Wasser deposition Exhibit number 1? 13:26:35

1	MS. RICE: Relevance, vague	13:26:38
2	as to time, overbroad.	13:26:40
3	MR. PRESIADO: Same	13:26:42
4	objections plus calls for hearsay.	13:26:42
R 5	A. I don't recall our specific	13:26:47
6	communications regarding her requests.	13:26:49
7	Q. Do you recall making any	13:26:52
8	kind of counter to any of these items?	13:26:56
9	MS. RICE: Vague as to time.	13:26:59
10	Irrelevant.	13:27:02
11	MR. PRESIADO: Objection,	13:27:05
12	relevance.	13:27:06
13	MS. RICE: Also to the	13:27:10
14	extent you're asking for	13:27:11
15	settlement communications, it	13:27:12
16	violates evidence code	13:27:14
17	Section 1152 in the mediation	13:27:16
18	privilege. The witness is	13:27:17
19	instructed not to answer any	13:27:18
20	questions that would require her	13:27:20
21	to divulge communications that	13:27:23
22	were done in the course and scope	13:27:25

1 of the mediations in the divorce 13:27:27
2 case, as well as settlement offers 13:27:29
3 that were exchanged between 13:27:32
4 counsel. 13:27:34

R; 5 A. All I recall is that without 13:27:45
H 6 any notice to us, at 8:30 in the morning 13:27:47
7 on the 27th, Samantha Spector and her 13:27:49
8 client went into court and obtained a no 13:27:54
9 notice ex parte restraining order. 13:27:56

10 Q. Had you had any 13:28:00
11 communications with Samantha Spector 13:28:05
12 prior to her going into court on that 13:28:09
13 Friday, May 27? 13:28:13

14 MR. PRESIADO: Objection. 13:28:17
15 To the extent it calls for hearsay 13:28:17
16 what Ms. Spector may or may have 13:28:18
17 not said. 13:28:22

18 MS. RICE: Relevance. 13:28:24

19 MR. PRESIADO: Relevant as 13:28:25
20 well. 13:28:26

R; 21 A. Yes. 13:28:31
H

22 Q. How many communications had 13:28:31

R; 1 you had with Ms. Spector prior -- 13:28:33
IU 2 following getting this letter and prior 13:28:36
3 to her going into court at 8:30 on May 13:28:38
4 27, 2016? 13:28:43

5 MS. RICE: Relevance. 13:28:43

6 MR. PRESIADO: Same 13:28:46

7 objection. 13:28:47

R; 8 A. I do not recall. 13:28:48
IU

9 Q. Do you have a recollection 13:28:49

10 of whether any of the communications that 13:28:54

11 you had with Ms. Spector between the 13:28:56

12 receipt of this letter that's dated May 13:29:00

13 24, 2016 and going -- and Ms. Spector 13:29:04

14 going into court on Friday, May 27, 2016, 13:29:06

15 related in any way to request on your 13:29:12

16 behalf -- on behalf of your client that 13:29:15

17 you made? 13:29:18

18 MS. RICE: Relevance. 13:29:19

19 MR. PRESIADO: Same 13:29:21

20 objection. Compound. 13:29:22

R; 21 A. No. 13:29:25
IU

22 Q. I just -- so that I close 13:29:25

1 the book before we go onto something 13:29:32
2 else. 13:29:34

R; 3 You recall having 13:29:34
AR; 4 communications with Samantha Spector 13:29:35
MS; 5 between May 24 and May 27. You can't 13:29:38
AA 6 recall how many, and you can't recall the 13:29:43
7 specifics of those communications; is 13:29:46
8 that accurate? 13:29:52

9 MR. PRESIADO: Objection, 13:29:52
10 compound. 13:29:54

11 MS. RICE: Misstates the 13:29:54
12 witness' prior testimony. 13:29:55

R; 13 A. It's not accurate. 13:29:58
AR; 14 Q. And in what way? Please 13:30:02
MS; 15 tell me. 13:30:05
AA

16 MS. RICE: Relevance. 13:30:06

17 MR. PRESIADO: Same 13:30:08
18 objection. 13:30:09

R; 19 A. I recall that we had 13:30:11
AR; 20 communications between the 24th and 13:30:12
MS; 21 probably the 26th. I doubt we spoke on 13:30:16
AA 22 the morning of the 27th before she went 13:30:18

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R; 1 into court. I do not know the content of
AR; 2 those communications, and I do not know
MS; 3 how many communications were had.
AA

4 Q. Now, on the next paragraph,
5 it has a proposal for private retired
6 judicial officers.

7 Ultimately, did you and
8 Ms. Spector talk about using private
9 retired judicial officers, whether it was
10 the list she provided or any others?

11 A. I believe so, yes.

12 Q. And what do you recall?

R 13 MS. RICE: Relevance.

14 MR. PRESIADO: Same

15 objection plus hearsay.

16 A. My recollection is that is

17 in almost all of our cases, certainly

18 those with high profile clients, we would

19 have liked to take it out of the system.

20 Ms. Spector was not willing to do that

21 with this case.

R;AR; 22 Q. What do you recall
MS;AA

R	1	Ms. Spector saying to indicate that she	13:31:33
	2	did not want to take it out of the system	13:31:36
	3	[inaudible]?	13:31:41
	4	MS. RICE: Relevance.	13:31:41
R	5	A. I don't recall her saying	13:31:46
	6	anything.	13:31:47
	7	Q. Now, after -- your	13:31:47
	8	understanding was that a CLETS DVTR0 was	13:31:59
	9	in fact obtained on Friday, May 27, 2016	13:32:04
	10	by Ms Heard against Mr. Depp, correct?	13:32:07
	11	A. That is my understanding.	13:32:10
	12	Q. After that, did there come a	13:32:12
	13	time that you or anyone at your law firm	13:32:18
	14	communicated with the Eastern Columbia	13:32:24
	15	Building concierge staff or management?	13:32:27
	16	A. Were those the downtown	13:32:32
	17	lofts?	13:32:37
	18	Q. The penthouse lofts, yes.	13:32:37
	19	And if it's easier for you, everyone has	13:32:39
	20	been referring to the Eastern Columbia	13:32:42
	21	Building as ECB; would that be helpful at	13:32:45
	22	all?	13:32:47

R;	1	A.	Sure.	13:32:48
H;				
FSPK	2	Q.	If you prefer to call them	13:32:49
	3		the penthouse loft, that is fine, too.	13:32:50
	4	A.	Now, that we've identified	13:32:53
	5		them, I understand what you are talking	13:32:55
	6		about. We can call them whatever you'd	13:32:56
	7		like.	13:32:58
	8		Did someone from my firm	13:32:59
	9		speak with somebody at those buildings?	13:33:00
	10		Yes.	13:33:06
	11	Q.	And who from your firm spoke	13:33:07
	12		with someone at the buildings and when?	13:33:11
	13	A.	I believe either I did or my	13:33:13
	14		partner Samantha Klein, or an associate	13:33:21
	15		who was also working on the case, Lisa	13:33:25
	16		Sutton from our firm. We also had	13:33:29
	17		co-counsel on the case, they may have	13:33:33
	18		been involved. As to when? I have to	13:33:34
	19		imagine it was sometime in June or July	13:33:38
	20		of 2016.	13:33:46
	21	Q.	Now, you indicated either	13:33:46
	22		you or Samantha Klein, Lisa Sutton, and	13:33:50

R;	1	you also had co-counsel.	13:33:54
H;			
FSPK	2	Do you have a specific	13:33:56
	3	recollection of speaking with anyone at	13:33:57
	4	the ECB building?	13:34:04
	5	A. I don't.	13:34:05
	6	Q. In preparation for this	13:34:08
	7	deposition, did you speak with Samantha	13:34:10
	8	Klein or Lisa Sutton to determine whether	13:34:12
	9	they had spoken with anybody at the ECB	13:34:16
	10	building?	13:34:21
	11	MS. RICE: Objection; calls	13:34:21
	12	for a privileged communication.	13:34:21
	13	Instruct her not to answer.	13:34:23
	14	MS. BREDEHOFT: How do you	13:34:32
	15	get there?	13:34:32
	16	MS. RICE: Communication	13:34:33
	17	between the lawyers regarding	13:34:38
	18	their representation of Mr. Depp	13:34:40
	19	is privileged communication.	13:34:41
	20	MS. BREDEHOFT: It's not	13:34:45
	21	privileged if they're	13:34:46
	22	communicating with a third party.	13:34:47

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1	And you have a set of topics here	13:34:49
2	that Ms. Wasser has been	13:34:51
3	designated to speak on behalf of	13:34:53
4	the law firm, and she has a duty	13:34:54
5	to speak when she's going to speak	13:34:57
6	on behalf of the law firm	13:35:00
7	specifically with respect to	13:35:02
8	communications with third parties	13:35:03
9	that she needs to engage in a	13:35:05
10	proper investigation in order to	13:35:09
11	be able to speak on behalf of the	13:35:11
12	company. So it's a completely	13:35:11
13	proper question, and there's	13:35:14
14	nothing about it that's	13:35:15
15	attorney/client privilege. Her	13:35:16
16	partners are not clients.	13:35:18
17	MS. RICE: That was not your	13:35:20
18	question. She's not going to	13:35:22
19	testify to her communications with	13:35:23
20	the other lawyers who worked on	13:35:24
21	this case in connection with their	13:35:26
22	representation of Mr. Depp. Those	13:35:27

1 are privileged communications. 13:35:30

2 It's also attorney work product. 13:35:31

ICD; 3 Q. Did you -- Ms. Wasser, did 13:35:34
R

4 you speak with Samantha Klein or Lisa 13:35:36

5 Sutton in preparation for this deposition 13:35:40

6 today to ascertain what their 13:35:42

7 communications were with the ECB building 13:35:45

8 staff? 13:35:48

9 MS. RICE: Objection. 13:35:48

10 You've -- the way you phrased the 13:35:50

11 question will require the 13:35:52

12 substance of the communication to 13:35:54

13 be disclosed. It's privileged 13:35:56

14 information and attorney work 13:35:58

15 product. Instruct her not to 13:36:00

16 answer. 13:36:01

17 MR. PRESIADO: Same 13:36:02

18 objection. 13:36:03

19 MS. BREDEHOFT: Who's the 13:36:03

20 client? 13:36:06

21 MS. RICE: Please ask your 13:36:07

22 next question. 13:36:08

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1	MS. BREDEHOFT: Who's the	13:36:09
2	client?	13:36:10
3	MS. RICE: Mr. Depp was the	13:36:11
4	firm's client as I believe you are	13:36:13
5	aware.	
6	MS. BREDEHOFT: I'm not	13:36:15
7	asking about the communications	13:36:16
8	with Mr. Depp. I'm asking her if	13:36:17
9	she spoke with Samantha Klein and	13:36:19
10	Lisa Sutton in preparation for the	13:36:22
11	deposition today about their	13:36:24
12	communications with a third party,	13:36:25
13	the ECB building.	13:36:26
14	MS. RICE: Same -- I'm not	13:36:28
15	going to withdraw the	13:36:30
16	instructions, please move on.	13:36:31
17	MS. BREDEHOFT: I'm going to	13:36:33
18	ask it again. I'm going to ask you	13:36:34
19	to rethink it, because there's no	13:36:35
20	attorney/client privilege involved	13:36:38
21	here at all, and I've already made	13:36:39
22	the statements, and it's a very	13:36:40

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1	significant area.	13:36:42
2	MS. RICE: No, you don't	13:36:44
3	seem to understand. My	13:36:45
4	communications with Ms. Wasser	13:36:47
5	regarding the firm's	13:36:49
6	representation of Mr. Depp are	13:36:50
7	privileged. Ms. Wasser's	13:36:52
8	communications with her partner	13:36:53
9	Samantha Klein regarding the	13:36:55
10	firm's representation of Mr. Depp	13:36:57
11	are privileged. Those are	13:36:59
12	privileged communications. Just	13:37:01
13	like when you talk to your	13:37:03
14	partners about your representation	13:37:06
15	of Amber Heard in this matter,	13:37:08
16	those are privileged	13:37:10
17	communications. You don't need to	13:37:10
18	ask the question a third time.	13:37:13
19	You've asked it twice. I've	13:37:15
20	instructed her not to answer.	13:37:16
21	MR. PRESIADO: And to be	13:37:20
22	clear, Mr. Depp is the holder of	13:37:20

1 the privilege. It asserts in all 13:37:23
2 instances. 13:37:26

R; 3 Q. What were Samantha Klein's 13:37:27

H; 4 communications with the ECB building? 13:37:31
FSPK;
ICD

5 A. I don't know. 13:37:34

6 MR. PRESIADO: I'm sorry, I 13:37:40

7 missed that question. 13:37:42

8 (The record is read back by
9 the reporter.) 13:38:00

R; 10 Q. What were Lisa Sutton's 13:38:00

H; 11 communications with the ECB building? 13:38:02
FSPK;
ICD

12 A. I don't know. 13:38:04

13 Q. What were your co-counsel's 13:38:07

14 communications with the ECB building? 13:38:10

15 When I say ECB building, I'm not talking 13:38:12

16 about the structure, I'm talking about 13:38:16

17 the individuals who worked there. 13:38:17

18 A. I don't know. 13:38:18

19 Q. And did you understand that 13:38:20

20 to -- do I have to go back and ask those 13:38:21

21 questions again; is that what you 13:38:24

22 understood me to mean? 13:38:25

1 A. I understood that's what you 13:38:25
2 meant. 13:38:27

3 Q. Thank you. And you don't -- 13:38:27

R;
FSPK

4 just so we're clear here, you don't 13:38:31

5 recall any communications with the ECB 13:38:33

6 building staff as well, correct? 13:38:36

7 A. You asked me if I had a 13:38:37

8 specific recollection, I do not. 13:38:39

9 Q. Do you have a general 13:38:41

10 recollection? 13:38:43

11 A. I believe that at some point 13:38:43

12 we subpoenaed the building's records of 13:38:49

13 the video from the lobby and elevator 13:38:52

14 areas. So I would imagine that the 13:39:00

15 communications would have to do with 13:39:03

16 those subpoenas. 13:39:05

17 Q. Do you have any recollection 13:39:06

18 of why you subpoenaed the building's 13:39:14

19 records for the elevator and the lobby 13:39:18

20 area surveillance films? 13:39:20

21 MS. RICE: Instruct the 13:39:22

22 witness not to answer on the 13:39:23

1	grounds that it invades the	13:39:24
2	attorney work product doctrine,	13:39:28
3	and Business Professions Code	13:39:28
4	Section 6068E.	13:39:30
5	Q. How did you learn there were	13:39:39
6	surveillance records of the ECB building	13:39:41
7	for the elevator and the lobby areas?	13:39:46
8	MS. RICE: Instruct the	13:39:48
9	witness not to answer to the	13:39:49
10	extent that it would require her	13:39:50
11	to disclose privileged	13:39:52
12	communications with her client or	13:39:53
13	her client's agents.	13:39:54
14	MR. PRESIADO: Same	13:39:57
15	objection.	13:39:57
16	A. Answering that question will	13:39:59
17	probably necessitate disclosure of	13:40:02
18	communications that I had with Mr. Depp.	13:40:04
19	Q. Are you able to tell me any	13:40:06
20	communications you or your firm or anyone	13:40:11
21	representing Mr. Depp that you worked	13:40:15
22	with, such as co-counsel, are you able to	13:40:16

1 tell me any communications that you had 13:40:21
2 with any of the ECB building personnel? 13:40:23

3 A. Beyond the subpoenas to 13:40:26
4 which I already testified? 13:40:28

5 Q. Let me ask it a different 13:40:31
6 way. 13:40:34

R; 7 Are you able to testify to 13:40:35
FSPK 8 any conversation you or anyone at your 13:40:38
9 firm or your co-counsel had with the ECB 13:40:44
10 building staff? 13:40:49

11 MR. PRESIADO: Objection. 13:40:51

12 Calls for speculation. 13:40:52

13 MS. RICE: Relevance. 13:40:52

14 MR. PRESIADO: Vague and 13:40:54

15 ambiguous.

R; 16 A. I am sure that there were 13:41:00
FSPK 17 conversations and communications 13:41:01
18 regarding the production of the 13:41:04
19 subpoenaed documents, review of the 13:41:08
20 subpoenaed documents that are compliance 13:41:11
21 with, I believe it was Ms. Spector's 13:41:17
22 subpoena that was sent, our ability to 13:41:20

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R;
FSPK

1
2
3
4
5
6
7
8
9

review the videos coordination of same.

But I don't have a specific recollection

of any communications.

Q. Are you able to speak to

whether there were any conversations

between you, anyone at your law firm or

your co-counsel, and ECB building

personnel prior to your issuing the

subpoena?

13:41:25
13:41:28
13:41:31
13:41:34
13:41:37
13:41:41
13:41:45
13:41:49
13:41:51

10
11
12
13
14
15
16
17
18
19
20
21

MR. PRESIADO: Objection.

MS. RICE: I can't --

whether or not the question was

asking for communications amongst

counsel or counsel with the

building? If it's the first, it's

privileged. The question is vague

and ambiguous.

MR. PRESIADO: My objection

is vague and ambiguous, and

compound, and calls for

speculation.

13:41:54
13:41:55
13:41:57
13:41:58
13:42:02
13:42:04
13:42:06
13:42:10
13:42:14
13:42:15
13:42:16
13:42:16

R;
FSPK

22

A. Also, I don't believe the

13:42:24

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Transcript of Laura Allison Wasser, Corporate Designee
Conducted on December 16, 2020

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R; FSPK	1	subpoena was issued by our firm.	13:42:25
	2	Q. So you don't have a	13:42:29
	3	recollection of a subpoena being issued	13:42:31
	4	on Mr. Depp's behalf for the ECB building	13:42:36
	5	surveillance tapes?	13:42:42
	6	A. I don't know. I know there	13:42:43
	7	was one issued. I believe it was issued	13:42:47
	8	by Ms. Spector.	13:42:50
	9	Q. So let me go back to my	13:42:51
	10	other question, because I don't believe	13:42:55
	11	we ever got an answer for it.	13:42:56
	12	Are you aware of you, any	13:42:57
	13	person at your firm, any of your	13:43:02
	14	co-counsel, having any conversations with	13:43:04
	15	anyone at the ECB building staff prior to	13:43:08
	16	the subpoena being issued?	13:43:13
	17	MR. PRESIADO: Objection.	13:43:17
	18	Compound. Calls for speculation.	13:43:19
	19	A. I don't know.	13:43:22
	20	Q. So are you not aware of;	13:43:22
	21	would that be fair to say?	13:43:26
	22	A. I'm just unsure as to time.	13:43:27

1	Q. Are there any conversations	13:43:30
2	that you have a specific recollection of	13:43:35
3	or knowledge in preparation for this	13:43:38
4	deposition that you, or Samantha Klein,	13:43:40
5	or Lisa Sutton, or anyone else at your	13:43:45
6	firm, or your co-counsel had with the ECB	13:43:48
7	building staff?	13:43:53
8	MS. RICE: Objection. Asked	13:43:54
9	and answered, and it's compound,	13:43:55
10	and vague and ambiguous.	13:43:57
11	MR. PRESIADO: Same	13:43:59
12	objection.	13:44:00
13	A. No.	13:44:03
14	MR. PRESIADO: Excuse me	13:44:08
15	guys. I need to interrupt for a	13:44:08
16	second. I got a text from my	13:44:10
17	daughter. She got a flat tire	13:44:13
18	apparently on the way to finals.	
19	So I just need to talk to her.	
20	You don't have to stop. As long	13:44:21
21	as Elaine, you stipulate that	
22	Camille can step in for me, and	13:44:23

1	then when I come back that I can	13:44:24
2	step back in.	13:44:26
3	MS. BREDEHOFT: Actually,	
4	I'd agree to that so that we can	13:44:32
5	keep this moving, yes.	
6	MR. PRESIADO: I'm sorry?	
7	MS. BREDEHOFT: I said I	13:44:34
8	would agree to that so that we	13:44:35
9	can keep this moving, yes.	
10	MR. PRESIADO: And Camille?	
11	You're still on, right? I don't	13:44:43
12	see you.	13:44:43
13	MS. VASQUEZ: I am.	
14	MS. BREDEHOFT: Welcome,	
15	Camille.	
16	MS. VASQUEZ: Thanks. Happy	
17	to join.	13:44:44
18	Q. Let's go back to the ECB	13:44:44
19	building.	13:45:01
20	Are you aware --	13:45:01
21	A. Are you able to take the	13:45:05
22	exhibit off, just so that I could see?	13:45:07

1 MS. BREDEHOFT: Yeah, I 13:45:11
2 think we can take that off. 13:45:11

R; 3 Q. So you indicated I believe 13:45:22
AA; 4 that there were communications with the 13:45:25
MS; 5 ECB staff regarding the production of 13:45:28
NC; 6 documents in response to the subpoena and 13:45:32
VA; 7 review of the subpoenaed documents. What 13:45:35
AF 8 do you recall? 13:45:37

9 MS. RICE: Vague and 13:45:43
10 ambiguous.

11 MS. VASQUEZ: Objection.
12 Relevance.

R; 13 A. As I testified, I don't 13:45:49
AA; 14 recall anything specific. Because I am 13:45:50
MS; 15 aware that there was a subpoena and that 13:45:52
NC; 16 there were videos produced, I believe 13:45:54
VA; 17 that there must have been communications, 13:45:57
AF 18 and I believe that there were 13:45:59
19 communications that were coordinating the 13:46:01
20 receipt and review of the videotapes. 13:46:05
21 Beyond that, I have no recollection of 13:46:07
22 specific conversations. 13:46:10

1	Q.	How were the videotapes	13:46:12
2		reviewed and received?	13:46:15
3	MS. RICE:	Excuse me. I	13:46:18
4		didn't catch that question.	13:46:19
5		(The record is read back by	
6		the reporter.)	13:46:26
7	MS. RICE:	The question is	13:46:26
8		vague and ambiguous, and compound,	13:46:27
9		and it's not relevant.	13:46:28
10	MS. VASQUEZ:	Objection. It	13:46:30
11		also assumes facts not in	13:46:31
12		evidence.	13:46:33
13	Q.	Ms. Wasser, I just want to	13:46:37
14		make sure, given these objections that	13:46:38
15		are coming out, didn't you just say	13:46:40
16		regarding the review and receipt of the	13:46:43
17		videos?	13:46:45
18	A.	Yes.	13:46:46
19	Q.	So how were those videos	13:46:48
20		received and reviewed?	13:46:51
21	A.	Well --	13:46:52
22	MS. RICE:	Vague and	13:46:56

1 ambiguous, and compound. 13:46:57

2 A. I'm not sure what your 13:46:58

3 question is. 13:46:59

4 Q. I'm going from your answer. 13:47:00

5 You said regarding the review -- receipt 13:47:03

6 and review of the videos; how were they 13:47:06

7 received by you and your firm, and how 13:47:09

8 were they reviewed? 13:47:14

9 MS. RICE: Compound. 13:47:15

10 MS. BREDEHOFT: I can ask 13:47:19

11 them one at a time. 13:47:20

12 MS. RICE: Please do. 13:47:21

R 13 Q. Let's talk about the videos 13:47:22

14 that you just referred to from the ECB 13:47:24

15 building staff. 13:47:27

16 How did you and your firm or 13:47:28

17 your co-counsel receive these videos? 13:47:31

18 A. I don't recall. I would 13:47:34

19 imagine like an E-file or something like 13:47:37

20 that. 13:47:43

21 Q. How were the videos reviewed 13:47:43

22 by your firm or your co-counsel? 13:47:51

1	MS. RICE: Objection.	13:47:54
2	Instruct the witness not to answer	13:47:55
3	on the grounds of attorney/client	13:47:56
4	privilege and the attorney work	13:47:58
5	product doctrine.	13:48:00
6	MS. BREDEHOFT: I'm talking	13:48:04
7	about the mechanics of how they	13:48:04
8	physically reviewed them.	13:48:07
9	A. Why? Sorry. Withdrawn.	13:48:09
10	MS. RICE: I have no idea	13:48:15
11	why, but how and -- how the firm	13:48:16
12	went about reviewing documents	13:48:19
13	produced in the case is work	13:48:21
14	product. It's also not relevant.	13:48:24
15	MS. VASQUEZ: Join in that	13:48:28
16	objection.	13:48:29
17	Q. Do you know how physically	13:48:30
18	those tapes, the surveillance tapes, were	13:48:37
19	reviewed by your firm or your co-counsel?	13:48:41
20	MS. RICE: The question is	13:48:44
21	vague and ambiguous, and to the	13:48:46
22	extent it would require you to	13:48:47

1 testify to who did what with 13:48:50
2 respect to tapes, it's privileged 13:48:52
3 work product and instruct you not 13:48:54
4 to answer. 13:48:56

5 Q. Are you able to answer? 13:48:59

6 A. No. My counsel has 13:49:03
7 instructed me not to. Haven't we gone 13:49:05
8 over that before. 13:49:08

9 Q. No, she said to the extent, 13:49:09
10 which meant that you were able to answer 13:49:11
11 outside of her objection that's why I'm 13:49:14
12 asking. 13:49:14

13 A. No. I am not able to answer 13:49:14
14 outside of her objection and instruction. 13:49:17

R; 15 Q. Is it your recollection that 13:49:20
FSPK;
AA; 16 there was just one E-file that contained 13:49:21
MS;
VA 17 all of the surveillance tapes? 13:49:25

18 A. I don't have a recollection 13:49:28
19 as to whether it was one or seven or 13:49:30
20 what. I just don't know. 13:49:33

21 Q. And that's going to be my 13:49:34
22 next question, do you have any sense of 13:49:36

R	1	how large this production was?	13:49:39
	2	A. I don't.	13:49:42
	3	Q. And when I asked earlier	13:49:46
	4	about the recollection of how you	13:49:49
	5	reviewed it, do you have a recollection	13:49:51
	6	of there being ECB personnel or do you	13:49:55
	7	have knowledge -- let me ask that clean.	13:49:59
	8	Do you have knowledge or	13:50:02
	9	recollection of any of that surveillance	13:50:08
	10	being reviewed with the ECB building	13:50:12
	11	personnel?	13:50:16
	12	MS. RICE: Relevance.	13:50:17
	13	Q. By your -- either you or	13:50:18
	14	your staff or the co-counsel?	13:50:20
	15	MS. RICE: Relevance.	13:50:24
	16	A. No.	13:50:26
R	17	Q. Do you know whether the ECB	13:50:26
	18	personnel participated with you or your	13:50:35
	19	staff or your co-counsel in the review of	13:50:40
	20	any aspect of the surveillance video in	13:50:42
	21	the ECB building?	13:50:46
	22	MS. RICE: Objection. Not	13:50:47

1 relevant. 13:50:48

R 2 A. No. 13:50:49

3 Q. Do you know whether anyone 13:50:49

4 from your firm, including you or your 13:50:53

5 co-counsel, identified or asked for any 13:50:56

6 specific clips to be saved on the 13:51:02

7 surveillance video? 13:51:06

8 MS. RICE: Objection. Not 13:51:09

9 relevant. 13:51:10

10 MS. VASQUEZ: Also calls for 13:51:12

11 attorney/client work product. 13:51:13

R 12 A. No. 13:51:17

13 Q. You don't know whether there 13:51:17

14 was; is that what your answer was? 13:51:22

15 A. I think your answer [sic] 13:51:23

16 was whether I recall if we made requests 13:51:29

17 for certain video clips to be segregated, 13:51:32

18 and the answer is I do not recall. 13:51:36

19 Q. Do you know whether you or 13:51:38

20 your staff, either co-counsel asked for 13:51:41

21 any specific clips of the video? 13:51:44

22 MS. RICE: Relevance. 13:51:48

1	MS. VASQUEZ: And I'm going	13:51:51
2	to object to the extent that it's	13:51:52
3	going to require you to divulge	13:51:54
4	any communications you've had with	13:51:55
5	counsel for Mr. Depp or with your	13:51:57
6	attorneys or co-counsel at the	13:52:01
7	time of the divorce, and instruct	13:52:03
8	you not to answer that question.	13:52:05
9	Q. Did anyone from your staff,	13:52:14
10	including you or your co-counsel, meet at	13:52:17
11	any time with the ECB building personnel,	13:52:21
12	any person in the ECB personnel to review	13:52:25
13	any of the surveillance footage?	13:52:30
14	MS. RICE: Objection,	13:52:32
15	relevance.	13:52:34
16	A. I believe co-counsel may	13:52:38
17	have met with somebody from ECB, but I'm	13:52:40
18	not positive.	13:52:42
19	Q. Do you know who the	13:52:43
20	co-counsel was?	13:52:47
21	MS. RICE: Objection,	13:52:50
22	relevance.	13:52:51

1	A. Yes.	13:52:52
2	Q. Who?	13:52:53
3	A. Who was our co-counsel in	13:52:54
4	this matter?	13:52:58
5	Q. That met with the ECB staff.	13:52:59
6	A. I don't know who from that	13:53:01
7	firm met with them. There were a couple	13:53:03
8	of people working on the case.	13:53:05
9	Q. And what is the basis for	13:53:07
10	you believing that the co-counsel met	13:53:10
11	with the ECB personnel to review any of	13:53:13
12	the footage?	13:53:16
13	MS. RICE: To the extent	13:53:18
14	that requires you to divulge	13:53:19
15	communications with co-counsel,	13:53:21
16	you're instructed not to answer.	13:53:24
17	A. It would.	13:53:26
18	Q. What efforts were made by	13:53:27
19	you or your staff or your co-counsel to	13:53:38
20	preserve the video footage of the	13:53:43
21	surveillance tapes of the ECB building?	13:53:47
22	MS. RICE: Compound. Not	13:53:51

1	relevant.	13:53:52
2	MS. VASQUEZ: Assumes facts	13:53:56
3	not in evidence as well.	13:53:57
4	A. I don't know that any	13:54:03
5	efforts were made to preserve. I think	13:54:04
6	once we received them, they were	13:54:06
7	preserved. Are you asking before that	13:54:08
8	time? I'm not sure what your question	13:54:10
9	is.	13:54:11
10	Q. Let me take your answer in	13:54:12
11	parts, because maybe we can get to the	13:54:16
12	answer then.	13:54:17
13	When you're saying once we	13:54:18
14	received them, was it your understanding	13:54:22
15	that you received the full video	13:54:24
16	surveillance tapes?	13:54:26
17	A. I don't know.	13:54:29
18	MS. RICE: Wait. Wait.	13:54:30
19	Vague and ambiguous as to what is	13:54:33
20	meant by the full surveillance	13:54:33
21	tapes. Calls for speculation.	13:54:35
22	Q. Did you have any	13:54:38

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1 understanding, Ms. Wasser, that when you 13:54:41
2 received the video footage, that you were 13:54:44
3 only receiving part of it, not for the 13:54:49
4 entire surveillance that they had for the 13:54:52
5 period requested? 13:54:55

6 A. What was the period 13:54:58
7 requested? 13:55:02

8 Q. I don't know. At least, I'm 13:55:02
9 not supposed to answer questions here. 13:55:08

10 What was your understanding 13:55:10
11 of what the period was that was 13:55:11
12 requested? 13:55:12

13 MS. RICE: Assumes facts not 13:55:14
14 in evidence. 13:55:15

15 A. As I sit here today, I don't 13:55:18
16 have an understanding. 13:55:20

R 17 Q. Did you have any -- when you 13:55:21
18 were talking about receiving the video 13:55:24
19 surveillance footage on whatever, whether 13:55:28
20 it was one file or seven files or eight 13:55:30
21 files, whatever, did you have any 13:55:33
22 understanding that you were not provided 13:55:36

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R	1	the full amount that was requested,	13:55:37
	2	whatever the amount was?	13:55:40
	3	A. No.	13:55:43
	4	Q. So you thought you received	13:55:46
	5	whatever you were supposed to receive; is	13:55:50
	6	that fair?	13:55:53
	7	A. Yes.	13:55:53
	8	Q. Okay. And then once you	13:55:55
	9	received that video surveillance footage,	13:55:58
	10	is it your testimony that you preserved	13:56:03
	11	that?	13:56:07
	12	MS. RICE: Excuse me, you	13:56:09
	13	cut out.	13:56:09
	14	Q. Is it -- once you received	13:56:11
	15	that full video surveillance footage, is	13:56:14
	16	it your testimony that you preserved	13:56:17
	17	that?	13:56:19
	18	A. I don't understand your	13:56:21
	19	question. Preserved it how?	13:56:25
	20	MS. VASQUEZ: I'm going to	13:56:29
	21	object, late. That's vague and	13:56:29
	22	ambiguous.	13:56:31

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R;
VA

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Q. What did you do with the actual surveillance video footage that you received?

13:56:31
13:56:35
13:56:39
13:56:40
13:56:41
13:56:42
13:56:46
13:56:47
13:56:49
13:56:50
13:56:55
13:56:56
13:56:59
13:57:00
13:57:02
13:57:03
13:57:05
13:57:07
13:57:08
13:57:12
13:57:14
13:57:15

MS. VASQUEZ: Objection.

Vague and ambiguous, and to the extent asking to divulge attorney/client communications or work product. I would ask that your counsel instruct you not to answer.

THE WITNESS: Amy, are you instructing me not to answer?

MS. RICE: If I understand the question, she's asking did you throw it away? Did you keep it? Did you put it in a file? Did you put it on a computer? I think she is just asking mechanically what was done with it.

R;
VA

A. I believe we kept it on the computer at least for the next couple of months in preparation for trial. I don't

R;
VA

1 know where it is now. 13:57:22

2 Q. That's my next question. Is 13:57:23

3 there a time that you no longer possessed 13:57:26

4 the video surveillance footage that was 13:57:31

5 sent to you by the ECB building? 13:57:34

6 A. I don't know. 13:57:36

7 Q. So I'm going to -- 13:57:43

R

8 MS. BREDEHOFT: Alan, I'm 13:58:17

9 going to ask you to bring up 13:58:17

10 document number three. Let's make 13:58:21

11 that Wasser number 2. Alan, may I 13:58:52

12 take control, please? 13:59:05

13 (Wasser Exhibit 2 documents 13:59:05

14 were marked for identification, as 13:59:05

15 of this date December 16, 2020.) 13:59:05

16 Q. Ms. Wasser, I'm going to ask 13:59:05

17 you to take a look at what has been 13:59:12

18 marked as Wasser deposition Exhibit 13:59:14

19 number 2, and it's a multipage document. 13:59:16

20 And so I'm going to scroll down a little 13:59:19

21 bit. You let me know if I'm going too 13:59:22

22 fast here. It's dated June 3rd. And 13:59:26

1 it's to Samantha Klein. She was working 13:59:32
2 with you on the Depp case, correct? 13:59:36
3 A. Correct. 13:59:37
4 Q. And it's from Samantha 13:59:38
5 Spector, which you can see there, and 13:59:41
6 I'll show you the signature later. And 13:59:42
7 it's a litigation called preservation of 13:59:45
8 information. It's not limited to 13:59:49
9 electronically stored information; do you 13:59:52
10 see that? 13:59:54
11 A. Yes. 13:59:54
12 Q. Do you recall receiving this 13:59:56
13 letter? And if you want me to scroll 13:59:58
14 down and let you read each page, I'm 13:59:59
15 happy to do that. 14:00:02
16 A. I'm familiar with this 14:00:02
17 letter. I recall receiving it. 14:00:04
R; 18 Q. And did you receive this 14:00:05
FSPK 19 letter before you received the 14:00:13
20 surveillance footage from the ECB 14:00:18
21 building? 14:00:22
22 A. I am not sure. 14:00:23

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R; FSPK; MS	1	Q. Well, I think you had	14:00:29
	2	indicated that you thought that it was in	14:00:33
	3	June or July that you received the	14:00:35
	4	surveillance footage; is that still your	14:00:38
	5	best recollection?	14:00:41
	6	A. Looking at the date and	14:00:41
	7	knowing the chronology of the case, it is	14:00:46
	8	my best estimate that we received this	14:00:49
	9	letter prior to the time that we received	14:00:51
	10	the video footage.	14:00:54
	11	Q. Well, did you take, just in	14:00:56
	12	case you received this afterwards, did	14:00:58
	13	you take any actions to destroy any	14:01:01
	14	aspect of the video surveillance footage	14:01:06
	15	prior to June 3rd, 2016?	14:01:09
	16	A. No.	14:01:11
	17	Q. Did you take any actions	14:01:11
	18	after this letter on June 3rd, 2016, to	14:01:15
	19	destroy or damage or not preserve the ECB	14:01:21
	20	video surveillance footage?	14:01:26
	21	A. No.	14:01:28
	22	Q. Now, what steps did you take	14:01:29

1 to preserve the ECB surveillance footage 14:01:42
2 both before and after receiving this 14:01:49
3 letter dated June 3rd, 2016? 14:01:51

4 MS. RICE: Objection, not 14:01:54
5 relevant. Assumes the fact not in 14:01:55
6 evidence that they had the footage 14:01:57
7 before the letter. 14:01:59

8 MS. BREDEHOFT: I'll 14:02:06
9 rephrase it. 14:02:06

R;
AF

10 Q. Ms. Wasser, what steps did 14:02:08
11 you and your firm and co-counsel take to 14:02:11
12 preserve the surveillance video footage 14:02:14
13 of ECB and the time you received it going 14:02:18
14 forward? 14:02:23

15 MS. RICE: Relevance. 14:02:24

R;
AF

16 A. I think the absence of us 14:02:29
17 doing anything to destroy the video 14:02:32
18 footage would be the most I could testify 14:02:35
19 regarding in terms of steps that we took 14:02:38
20 to preserve the video footage. 14:02:39

21 Q. Are you aware of any 14:02:43
22 destruction of the video footage, the 14:02:52

R;
AA 1 surveillance video footage from ECB up to 14:02:54
2 the present? 14:02:58

3 A. By ECB or by Wasser, 14:02:58
4 Cooperman & Mandles? 14:03:04

5 Q. By Wasser, Cooperman & 14:03:06
6 Mandles or your co-counsel. 14:03:08

R;
AA 7 A. No. We probably still have 14:03:09
8 it. 14:03:11

9 Q. Have you looked for it? 14:03:12

10 A. No. 14:03:14

11 Q. Have you been asked to look 14:03:15
12 for it? 14:03:17

13 MS. RICE: Objection to the 14:03:19
14 extent it calls for privileged 14:03:19
15 communications with Mr. Depp's 14:03:22
16 counsel. You're instructed not to 14:03:24
17 answer. 14:03:25

18 MR. PRESIADO: Same 14:03:27
19 objection. 14:03:29

R;
AA 20 A. No. 14:03:29

21 Q. I'm going to ask you to take 14:03:29
22 a look at -- 14:03:40

R	1	MS. BREDEHOFT: Alan, can	14:03:44
	2	you bring up Wasser four, please?	14:03:45
	3	We'll mark that as Wasser Exhibit	14:03:48
	4	number 3.	14:03:50
	5	(Wasser Exhibit 3 June 6,	
	6	2013 document was marked for	
	7	identification, as of this date	
	8	December 16, 2020.)	14:04:12
	9	Q. I'm going to ask you to take	14:04:12
	10	a look at what has now been marked as	14:04:13
	11	Wasser deposition Exhibit number 3, and	14:04:15
	12	it's dated June 6, 2013, addressed to	14:04:18
	13	you, and it's from Charles Carter.	14:04:24
	14	Did you have an	14:04:26
	15	understanding that Mr. Carter also	14:04:27
	16	represented Amber Heard?	14:04:29
	17	A. I did when I received this	14:04:30
	18	letter on June 6.	14:04:34
	19	Q. And did you have an	14:04:35
	20	understanding that Mr. Carter was also	14:04:38
	21	asking you to preserve any evidence?	14:04:40
	22	A. Yes.	14:04:43

R

1 MS. BREDEHOFT: I'm going to 14:04:46
2 ask, Alan, can you bring up the 14:04:47
3 next document, which is, I believe 14:04:50
4 Wasser 5 in the labels. We're 14:04:53
5 going to make it Wasser deposition 14:04:55
6 Exhibit number 4. 14:04:58
7 (Wasser Exhibit 4 June 6
8 document was marked for
9 identification, as of this date
10 December 16, 2020.)

11 Q. Ms. Wasser, I'm going to ask 14:05:15
12 you to take a look at what has been 14:05:16
13 marked as Wasser deposition Exhibit 14:05:18
14 number 4. It's dated June 6 as well, and 14:05:20
15 it's to Charles Carter from your firm. 14:05:23
16 And you are acknowledging receipt of the 14:05:27
17 preservation of the letter from Ms. Heard 14:05:31
18 as well as his. And you indicated, we 14:05:33
19 are fully aware of our obligation with 14:05:39
20 respect to the preservation of evidence. 14:05:41
21 Please rest assure that we intend to 14:05:43
22 comply with the preservation demand and 14:05:45

1	expect that Ms. Heard will do so as well.	14:05:47
2	Do you recall saying that in	14:05:49
3	this letter?	14:05:50
R 4	MS. RICE: Objection,	14:05:52
5	relevance.	14:05:52
6	A. Yes.	
7	Q. Was this letter in fact from	14:05:57
8	you to Mr. Carter?	14:05:59
9	MS. RICE: Objection,	14:06:02
10	relevance.	14:06:03
11	A. It was.	14:06:04
12	Q. Do you have a recollection	14:06:04
13	of reviewing any part of the surveillance	14:06:20
14	video footage from Eastern Columbia	14:06:26
15	Building at any time up to the present?	14:06:29
16	MS. RICE: Answer that yes	14:06:31
17	or no.	
18	A. Yes.	14:06:33
19	Q. When?	14:06:34
20	MS. RICE: Objection.	14:06:37
21	Attorney work product. Instruct	14:06:38
22	the witness not to answer. It's	14:06:41

1	also not relevant.	14:06:43
2	MS. BREDEHOFT: How is that	14:06:52
3	attorney work product?	14:06:53
4	MS. RICE: When Ms. Wasser	14:06:56
5	did what in furtherance of her	14:06:58
6	representation of Mr. Depp is not	14:07:01
7	-- is attorney work product.	14:07:03
8	Q. When is the last time you or	14:07:07
9	anyone at your firm or your co-counsel,	14:07:10
10	to your knowledge, reviewed any part of	14:07:14
11	the video surveillance from the ECB	14:07:17
12	building?	14:07:21
13	MS. RICE: Compound. Calls	14:07:22
14	for speculation as phrased. It's	14:07:25
15	also not relevant.	14:07:27
16	MR. PRESIADO: Same	14:07:28
17	objections.	14:07:29
18	A. June, July, possibly very	14:07:35
19	early August 2016.	14:07:38
20	Q. As you sit here today, would	14:07:40
21	you be able to describe anything you saw	14:07:57
22	on the video surveillance tapes that were	14:08:01

1 provided by the ECB building staff? 14:08:06

2 MS. RICE: You know this is 14:08:10

3 really a waste of time. I assume, 14:08:12

4 counsel, you have the video. So 14:08:15

5 why would you bother this lawyer, 14:08:19

6 asking her to describe what she 14:08:21

7 saw on a video that you have. 14:08:23

8 It's really bordering on 14:08:26

9 harassment. Her recollection of 14:08:28

10 what's on a document or on a video 14:08:29

11 that you have, is not relevant. I 14:08:32

12 ask you to move on to something 14:08:37

13 that is relevant. 14:08:38

14 Q. Do you remember the 14:08:41

15 question? 14:08:42

16 A. Yes. The answer is yes. 14:08:43

17 Q. What do you recall? 14:08:47

18 MS. RICE: Same objections. 14:08:50

19 This borders on harassment. It's 14:08:52

20 irrelevant. 14:08:54

21 A. Rather boring footage of 14:08:59

22 individuals coming in and out of the 14:09:04

1	building, in and out of the elevator. In	14:09:06
2	instances, Ms. Heard laughing and playing	14:09:11
3	around with other individuals in the	14:09:19
4	elevator.	14:09:24
5	Q. Anything else?	14:09:24
6	A. No.	14:09:37
7	Q. Okay. When you said	14:09:38
8	Ms. Heard laughing and playing around	14:09:43
9	with others in the elevator, when was	14:09:45
10	that?	14:09:51
11	MS. RICE: Vague and	14:09:53
12	ambiguous.	14:09:56
13	MR. PRESIADO: Same	14:09:56
14	objection.	14:09:57
15	A. What does your question	14:10:01
16	refer to, Elaine, timewise?	14:10:02
17	Q. That's fair.	14:10:04
18	Do you recall what date that	14:10:05
19	was on the video surveillance?	14:10:07
20	A. No.	14:10:12
21	Q. Do you recall who the other	14:10:12
22	individuals were?	14:10:14

Transcript of Laura Allison Wasser, Corporate Designee
Conducted on December 16, 2020

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1	A. I don't believe I knew who	14:10:14
2	the other individuals were.	14:10:16
3	Q. And it was in the elevator?	14:10:17
4	A. I believe so. I think there	14:10:22
5	were also some videos from the lobby of	14:10:26
6	the building.	14:10:28
7	Q. How many people were in the	14:10:29
8	elevator when Ms. Heard was laughing and	14:10:32
9	playing around?	14:10:35
10	MS. RICE: Objection,	14:10:36
11	relevance.	14:10:39
12	MR. PRESIADO: Also,	14:10:39
13	objection as to this line of	14:10:40
14	questioning. The subject video	14:10:41
15	speaks for itself.	14:10:42
16	MS. RICE: Indeed.	14:10:44
17	A. At any given time, there	14:10:46
18	were two or three.	14:10:48
19	Q. How many times did you see	14:10:49
20	Ms. Heard laughing and playing with other	14:10:52
21	individuals in the elevator?	14:10:55
22	A. A few.	14:10:56

1	Q.	Would you say three or more?	14:10:57
2	A.	Individual --	14:11:00
3		MR. PRESIADO: Objection.	14:11:03
4	A.	Individuals or times?	14:11:06
5	Q.	Times.	14:11:07
6	A.	I don't recall.	14:11:08
7	Q.	Would you say more than	14:11:10
8		five?	14:11:12
9		MS. RICE: Objection,	14:11:14
10		relevance.	14:11:16
11		MR. PRESIADO: Video speaks	14:11:19
12		for itself.	14:11:20
13	A.	The attention span to watch	14:11:21
14		for that long, so I don't know.	14:11:24
15	Q.	Is there anything else you	14:11:25
16		can recall seeing on the surveillance	14:11:32
17		video from your review of it?	14:11:34
18		MS. RICE: Objection,	14:11:37
19		relevance.	14:11:38
20	Q.	From the ECB building?	14:11:39
21	A.	No.	14:11:41
22		MR. PRESIADO: Same	14:11:42

1	objection.	14:11:43
2	Q. When you reviewed this video	14:11:43
3	footage, surveillance footage, do you	14:12:00
4	recall what the quality of the video was;	14:12:04
5	in other words, how clear it was?	14:12:08
6	MS. RICE: Objection,	14:12:13
7	relevance.	14:12:14
8	MR. PRESIADO: Same	14:12:16
9	objection. Also the video speaks	14:12:17
10	for itself.	14:12:19
11	A. I do not recall how clear	14:12:23
12	the video was.	14:12:25
13	Q. What I'm asking to try to	14:12:25
14	just get through this is a lot of times	14:12:29
15	video surveillance footage is grainy,	14:12:33
16	black and white, you know, it's difficult	14:12:37
17	sometimes to zoom in or other things.	14:12:40
18	Do you recall it being like	14:12:43
19	that, or do you recall it being very high	14:12:44
20	quality in color, easy to see?	14:12:47
21	MS. RICE: Objection,	14:12:50
22	relevance.	14:12:51

1	MR. PRESIADO: Same	14:12:53
2	objection.	14:12:53
3	A. I don't believe it was	14:12:53
4	color. But you could definitely make out	14:12:56
5	who the people were if you knew them.	14:13:01
6	And could see, you know, what they were	14:13:03
7	wearing. That Ms. Heard was -- seemed	14:13:07
8	extremely joyful, and everybody seemed to	14:13:11
9	be having a pretty good time. That was	14:13:18
10	my recollection.	14:13:20
11	Q. Do you remember anything	14:13:21
12	else about the videos other than that?	14:13:25
13	A. No.	14:13:27
14	Q. And when you say Ms. Heard	14:13:29
15	was extremely happy, and I know I asked	14:13:31
16	you this before and you said you didn't	14:13:36
17	have that good of an attention span; I'm	14:13:38
18	just trying to understand how many times	14:13:40
19	you can recall seeing it that she was	14:13:42
20	extremely happy and playful and smiling?	14:13:44
21	Are we talking between one and five, five	14:13:48
22	and ten, 20 to 25?	14:13:50

1 MS. RICE: Vague and 14:13:53
2 ambiguous as to what you're 14:13:56
3 asking.
4 A. I don't understand what 14:13:57
5 you're asking. And to be clear, I didn't 14:13:58
6 say I didn't have a very good attention 14:13:59
7 span. I said I didn't have the attention 14:14:02
8 span to watch hours and hours of video 14:14:04
9 surveillance of that building. 14:14:07
10 Q. Okay. Let me go back then 14:14:10
11 and ask this question. 14:14:20
12 Do you recall how many times 14:14:21
13 you saw Ms. Heard on the video 14:14:27
14 surveillance footage appearing extremely 14:14:29
15 happy and smiling and playful? 14:14:33
16 MS. RICE: Objection, 14:14:36
17 relevance. 14:14:38
18 A. Two or three. 14:14:39
19 Q. Do you recall whether they 14:14:40
20 were on the same day or separate days? 14:14:43
21 MS. RICE: Objection, 14:14:46
22 relevance. 14:14:46

1	A.	I don't.	14:14:49
2	Q.	Do you recall whether they	14:14:49
3		were morning, afternoon or night?	14:14:51
4		MS. RICE: Objection,	14:14:55
5		relevance.	14:14:56
6	A.	I do not.	14:14:59
7	Q.	Were they all in the	14:14:59
8		elevator?	14:15:02
9		MS. RICE: Objection,	14:15:03
10		relevance.	14:15:04
11	A.	The videos when Ms. Heard	14:15:07
12		was laughing and smiling were in the	14:15:10
13		elevator. I believe that the	14:15:14
14		surveillance videos from the lobby were	14:15:16
15		not shot at close enough range to be able	14:15:19
16		to determine her facial expression. It	14:15:22
17		was more from above and walking in and	14:15:27
18		out of the building.	14:15:30
19	Q.	Okay. Let me just take that	14:15:31
20		second part of that.	14:15:36
21		So your recollection of the	14:15:37
22		surveillance footage is that when people	14:15:38

1 were in the lobby -- and I'm not trying 14:15:43
2 to put words in your mouth. I'm just 14:15:46
3 trying to understand what you're saying 14:15:47
4 here -- it was a little bit further away 14:15:49
5 and a little harder to tell who? 14:15:52
6 MS. RICE: Objection, 14:15:53
7 relevance. 14:15:54
8 A. It was a little further 14:15:56
9 away. It wasn't difficult to tell who if 14:15:57
10 you knew them I suppose. 14:16:00
11 Q. So what could you see in the 14:16:01
12 lobby that was different than the 14:16:05
13 elevator? 14:16:07
14 MS. RICE: Objection, 14:16:08
15 relevance, vague and ambiguous. 14:16:09
16 A. The lobby was a wider range 14:16:12
17 in terms of location. So you could see 14:16:15
18 people walking across the lobby, I 14:16:18
19 believe passed like the concierge's desk 14:16:21
20 in entering, exiting the building. 14:16:25
21 Whereas the elevator was the most more 14:16:27
22 close circuit, and you would see a larger 14:16:29

1	version of the individuals in the	14:16:34
2	elevator.	14:16:37
3	Q. Do you have a recollection	14:16:41
4	of seeing any video surveillance of	14:16:43
5	Ms. Heard in the lobby?	14:16:45
6	MS. RICE: Objection,	14:16:50
7	relevance.	14:16:53
8	A. I believe so. Just walking	14:16:55
9	through, entering or exiting the	14:16:59
10	building.	14:17:02
11	Q. Other than Ms. Heard	14:17:02
12	exiting or entering the building to the	14:17:06
13	lobby, did you see anything else with	14:17:09
14	Ms. Heard that was other than the	14:17:11
15	elevator?	14:17:14
16	A. Not that I can recall.	14:17:14
17	MR. PRESIADO: Same	14:17:17
18	objection. Video speaks for	14:17:18
19	itself. It has the best evidence	14:17:19
20	of the contents.	14:17:22
21	Q. When you were talking about	14:17:22
22	the quality of the video, you thought you	14:17:26

1 remembered it was black and white. 14:17:29

2 Do you have a recollection 14:17:31

3 whether, in the video you were watching, 14:17:33

4 you were able to enlarge or make it 14:17:35

5 smaller to see closer up? 14:17:39

6 A. I don't have a recollection 14:17:41

7 of that. 14:17:44

8 Q. And I asked that so badly 14:17:45

9 that I don't know what your answer means. 14:17:48

10 Were you able to zoom in, if 14:17:51

11 you will, on any of the video footage 14:17:55

12 surveillance that you had from the ECB 14:17:58

13 building? 14:18:02

14 A. I don't recall. Possibly. 14:18:03

15 Q. You don't specifically 14:18:06

16 recall; is that correct? 14:18:08

17 A. Correct. 14:18:10

18 Q. And then let's go back to 14:18:11

19 the other part of that question. 14:18:14

20 Do you recall whether the 14:18:17

21 video was grainy or very clear, something 14:18:19

22 in between? 14:18:25

1	MS. RICE: Objection.	14:18:26
2	MR. PRESIADO: Objection.	14:18:27
3	MS. RICE: Relevance.	14:18:28
4	MR. PRESIADO: Objection.	14:18:30
5	Video speaks for itself.	14:18:31
6	A. Something in between. It	14:18:37
7	wasn't terribly grainy. It wasn't	14:18:38
8	terribly clear.	14:18:41
9	Q. Okay. Thank you.	14:18:42
10	Do you have a recollection	14:18:52
11	of there being any issue with the	14:18:53
12	timestamp that was on the video	14:18:58
13	surveillance film; in other words, that	14:19:01
14	it might be off at all?	14:19:03
15	MS. RICE: Objection to the	14:19:08
16	extent it would require her to	14:19:09
17	divulge privileged communications	14:19:11
18	with either her client or the	14:19:13
19	lawyers working for the client on	14:19:15
20	this matter.	14:19:17
21	MR. PRESIADO: Same	14:19:20
22	objection plus vague and ambiguous	14:19:20

1	and compound.	14:19:22
2	A. I can't answer, because my	14:19:25
3	recollection would involve conversations	14:19:29
4	that I had with other members of my firm	14:19:31
5	in conjunction with our representation of	14:19:34
6	Mr. Depp.	14:19:35
7	Q. I'm going to just ask you	14:19:36
8	whether you have a recollection of the	14:19:42
9	timestamp being different than the actual	14:19:46
10	time spot on there, not your discussions	14:19:51
11	with the firm.	14:19:54
12	(Court reporter asked for a	
13	repeat).	14:19:59
14	Q. Do you have a recollection	14:20:03
15	of there being an issue with the time	14:20:05
16	spot -- with the timestamp, setting aside	14:20:09
17	what the issue is? Do you have a	14:20:13
18	specific recollection of there being an	14:20:15
19	issue with the timestamp?	14:20:17
20	MS. RICE: Answer yes or no.	14:20:20
21	A. No.	14:20:22
22	Q. Did you have any discussions	14:20:22

1	with the LA Police Department respecting	14:20:34
2	Amber Heard and Johnny Depp in any of the	14:20:41
3	allegations?	14:20:44
4	A. Yes.	14:20:44
5	Q. What do you recall?	14:20:49
6	MR. PRESIADO: Objection.	14:20:54
7	It calls for hearsay.	14:20:55
8	A. I spoke with officers from	14:21:00
9	the Los Angeles Police Department about	14:21:03
10	-- at least one incident where they went	14:21:07
11	to the buildings we've been discussing,	14:21:12
12	and what their impressions and	14:21:16
13	observations were at that time.	14:21:18
14	Q. Was that you personally that	14:21:21
15	had those discussions?	14:21:23
16	A. I believe I had at least	14:21:24
17	one. I believe that other individuals	14:21:27
18	from my firm probably had additional	14:21:29
19	conversations.	14:21:33
20	Q. Do you recall who from your	14:21:34
21	firm had other conversations?	14:21:37
22	A. It probably would have been	14:21:38

1 the two attorneys I had mentioned before, 14:21:41
2 Samantha Klein or Lisa Sutton. 14:21:43
3 Additionally one or more members of 14:21:47
4 Glaser Weil -- Christine, that's 14:21:50
5 W-E-I-L -- would have perhaps 14:21:54
6 participated in communications with LAPD. 14:21:57
7 Q. Do you recall who you 14:22:01
8 specifically spoke with? 14:22:05
9 A. I do not. 14:22:06
10 Q. Do you recall whether the 14:22:08
11 person you spoke with was male or female? 14:22:14
12 MS. RICE: Objection, 14:22:19
13 relevance. 14:22:20
14 A. If my recollection is 14:22:23
15 correct, there was one of each. 14:22:24
16 Q. I thought you only spoke 14:22:28
17 with one. Did I misunderstand that? 14:22:31
18 A. I may have had one phone 14:22:33
19 conversation, but I think they were both 14:22:37
20 on it. I can't remember, but I do seem 14:22:39
21 to recall there was a male and a female 14:22:41
22 officer. I could be wrong though. Maybe 14:22:43

1	it was a female that I spoke with that	14:22:46
2	was helping me track down the officers	14:22:49
3	that had gone to the apartment that day.	14:22:51
4	I don't know.	14:22:54
5	Q. Do you recall when you had	14:22:54
6	this conversation?	14:22:56
7	A. It would have been Summer	14:22:57
8	2016.	14:23:01
9	Q. Do you remember whether it	14:23:02
10	was before or after July?	14:23:06
11	A. I do not.	14:23:07
12	Q. And I take it from your	14:23:09
13	earlier answer, and I just want to make	14:23:13
14	sure it's clear, that you called the LA	14:23:15
15	Police Department and tried to track down	14:23:18
16	the officers and were successful for at	14:23:20
17	least one call with at least one officer,	14:23:23
18	possibly two?	14:23:25
19	MS. RICE: Objection,	14:23:26
20	events.	
21	A. Elaine, those officers were	14:23:29
22	deposed as part of the dissolution	14:23:31

Transcript of Laura Allison Wasser, Corporate Designee
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1	matter, so we would have had to find	14:23:33
2	them, their depositions were taken. I'm	14:23:35
3	sure you have records of that that are	14:23:38
4	accurate than whatever I'm able to tell	14:23:43
5	you as I sit here today having not	14:23:45
6	reviewed our file.	14:23:47
7	Q. Do you recall my question?	14:23:48
8	A. I do.	14:23:51
9	Q. Was it accurate?	14:23:57
10	A. No.	14:23:58
11	MS. RICE: Vague and	14:24:00
12	ambiguous.	
13	A. My answer was accurate. If	14:24:02
14	you have a yes or no question to ask,	14:24:04
15	please go ahead, but...	14:24:06
16	MS. BREDEHOFT: Madam court	
17	reporter, could you please read	
18	back the question.	
19	(The record is read back by	
20	the reporter.)	14:24:40
21	MR. PRESIADO: Objection,	14:24:40
22	compound.	14:24:41

1	MS. RICE: Relevance.	14:24:41
2	A. So in conjunction with my	14:24:43
3	testimony, answering that question, a	14:24:44
4	specific answer to your question is yes.	14:24:50
5	Q. Thank you. Do you recall	14:24:52
6	reviewing any body cam footage from the	14:24:58
7	police officers?	14:25:04
8	A. I do not.	14:25:05
9	Q. Can you recall asking to	14:25:06
10	review any body cam footage from the	14:25:09
11	officers?	14:25:13
12	A. I do not.	14:25:13
13	MS. RICE: As phrased, it	14:25:15
14	would potentially invade the	14:25:17
15	attorney/client privilege or	14:25:20
16	attorney work product doctrine,	
17	identified the person to whom she	14:25:26
18	made the request if at all.	14:25:26
19	Q. Do you recall asking anyone	14:25:28
20	at the LA Police Department or the	14:25:32
21	officers to review the officers' body cam	14:25:34
22	footage from the time they went to the	14:25:40

1	penthouse?	14:25:41
2	A. I do not recall that.	14:25:42
3	Q. Do you know what the	14:25:44
4	policies for the LA Police Department in	14:25:48
5	May of 2016 were with respect to body	14:25:53
6	cams?	14:25:58
7	MS. RICE: Objection,	14:25:58
8	relevance.	14:25:59
9	A. I do not.	14:26:01
10	Q. Do you know what the LA	14:26:01
11	Police Department's policies and	14:26:06
12	procedures were with respect to	14:26:09
13	documenting any physical injuries or	14:26:11
14	property damage or lack thereof in May	14:26:15
15	of 2016?	14:26:19
16	MS. RICE: Objection,	14:26:19
17	relevance.	14:26:20
18	A. I do not.	14:26:23
19	Q. Were you aware that there	14:26:23
20	were two sets of officers that reported	14:26:25
21	to the penthouse that night?	14:26:28
22	MS. RICE: Objection,	14:26:30

1	relevance.	14:26:31
2	A. Now that you have refreshed	14:26:36
3	my recollection, that does sound like it	14:26:37
4	was the case.	14:26:42
5	Q. And now that I refreshed	14:26:43
6	your recollection, what do you recall	14:26:46
7	about two sets of officers reporting to	14:26:48
8	the penthouse that night?	14:26:52
9	MS. RICE: Instruct the	14:26:54
10	witness not to answer to the	14:26:55
11	extent that it requires her to	14:26:57
12	divulge attorney/client privilege	14:26:58
13	communications.	14:27:00
14	MR. PRESIADO: I adopt that	14:27:03
15	as well as vague and ambiguous.	14:27:04
16	A. Beyond attorney/client	14:27:10
17	privilege communications, my recollection	14:27:13
18	is that the police were called and	14:27:15
19	dispatched twice.	14:27:20
20	Q. And is that all you can	14:27:21
21	answer without divulging attorney/client	14:27:28
22	privilege?	14:27:32

1	A. Yes.	14:27:32
2	Q. I don't want to ask a bunch	14:27:33
3	of questions if that's going to be the	14:27:36
4	answer. I just want to make sure that's	14:27:37
5	the extent of your recollection. It's	14:27:39
6	not attorney/client privilege.	14:27:41
7	Do you have a recollection	14:27:46
8	of ever reviewing body cam footage from	14:27:47
9	any of the police officers?	14:27:49
10	A. I do not.	14:27:51
11	Q. Now, you talked about	14:27:55
12	depositions being taken in this case.	14:28:02
13	Do you recall how many	14:28:05
14	depositions were taken in the divorce	14:28:07
15	litigation?	14:28:10
16	MS. RICE: Objection,	14:28:11
17	relevance. Can we take down the	14:28:11
18	exhibit, please?	14:28:17
19	MR. PRESIADO: Same	
20	objection.	
21	MS. BREDEHOFT: I'm sorry,	
22	I'm not sure I got an answer.	14:28:17

1	A.	Are you asking in total or	14:28:17
2		on our side?	14:28:36
3	Q.	In total, in the divorce	14:28:37
4		litigation.	14:28:41
5	MS. RICE:	Objection,	14:28:43
6		relevance.	14:28:44
7	MR. PRESIADO:	Same	14:28:46
8		objection.	14:28:47
9	A.	Ten to 15, I'd say.	14:28:52
10	Q.	And how many were taken on	14:28:56
11		behalf of Mr. Depp --	14:29:00
12	MS. RICE:	Objection,	14:29:02
13		relevance.	14:29:03
14	MR. PRESIADO:	Same	14:29:06
15		objection.	14:29:07
16	Q.	-- of the ten or 15?	14:29:20
17	A.	You know, I'm having a hard	14:29:21
18		time remembering, because I'm not sure	14:29:28
19		whether some of the third-party	14:29:29
20		depositions were subpoenaed by us or	14:29:30
21	Ms. Heard.	I just don't know.	14:29:36
22	Q.	I'm going to read to you a	14:29:37

1	paragraph from Mr. Depp's complaint that	14:29:46
2	was filed in Fairfax Circuit Court on	14:29:51
3	March 1st, 2019. And specifically,	14:29:57
4	counsel, for those of you who want to be	14:29:59
5	looking at this, Paragraph 17 of	14:30:02
6	Mr. Depp's complaint against Ms. Heard	14:30:06
7	says the following: quote, now there are	14:30:08
8	newly obtained surveillance camera	14:30:12
9	videos, depositions and other evidence	14:30:15
10	that conclusively disprove Ms. Heard's	14:30:17
11	false allegations. Although much of this	14:30:20
12	exculpatory evidence was collected by	14:30:25
13	certain members of Mr. Depp's then legal	14:30:25
14	team in 2016, it only recently came into	14:30:27
15	Mr. Depp's possession as it had been	14:30:32
16	hidden from him for a period of years.	14:30:35
17	Did you or any of your legal	14:30:39
18	staff or co-counsel hide from Mr. Depp	14:30:42
19	the surveillance camera videos?	14:30:47
20	MR. PRESIADO: Objection,	14:30:50
21	assumes facts not in evidence.	14:30:52
22	MS. RICE: Instruct the	14:30:53

1	witness not to answer on the	14:30:55
2	grounds of the attorney/client	14:30:56
3	privilege, the attorney work	
4	product doctrine, and Business and	14:30:58
5	Professions Code Section 6068E.	14:30:59
6	MS. BREDEHOFT: I beg to	14:31:03
7	differ with you. Mr. Depp made	14:31:04
8	this public by making this	14:31:05
9	allegation in the litigation which	14:31:07
10	waived that form of the privilege.	14:31:10
11	So I am going to ask you to	14:31:12
12	withdraw that objection, and	14:31:14
13	withdraw the instruction not to	14:31:17
14	answer, and let Ms. Wasser answer	14:31:19
15	this specific allegation that	14:31:22
16	alleges that it was hidden from	14:31:23
17	him for a period of years.	14:31:28
18	MS. RICE: There's no	14:31:29
19	allegation that Wasser, Cooperman,	14:31:30
20	& Mandles hid anything. So you're	14:31:31
21	misstating whatever it is he's	14:31:32
22	alleged, counsel.	14:31:34

1	MR. PRESIADO: I assert the	14:31:37
2	attorney/client privilege as well.	14:31:40
3	And just because there's an	14:31:41
4	allegation made of complaint,	14:31:43
5	doesn't mean that that is a waiver	14:31:45
6	of attorney/client communications	14:31:46
7	as to that subject matter.	14:31:49
8	MS. BREDEHOFT: So you	14:31:53
9	are --	14:31:54
10	MR. PRESIADO: It's not even	
11	close.	
12	MS. BREDEHOFT: You know, I	14:32:01
13	never met you before today.	14:32:01
14	Are you licensed in	14:32:02
15	Virginia, Mr. Presiado?	14:32:02
16	MR. PRESIADO: Me? No, I am	14:32:12
17	not.	14:32:13
18	MS. BREDEHOFT: Are you	14:32:13
19	citing Virginia law on	14:32:14
20	attorney/client privilege, or are	14:32:17
21	you citing law from California?	14:32:18
22	MR. PRESIADO: Other law.	

1 MS. BREDEHOFT: Can you site
2 for me specifically what your
3 authority is in Virginia?

4 MR. PRESIADO: I'm not being
5 deposed today.

6 MS. BREDEHOFT: Well, this
7 is a pretty serious one, because
8 the allegations clearly have been
9 made very publicly that these --
10 that the surveillance camera
11 videos, depositions and other
12 evidence have been hidden from him
13 for a period of years. You're
14 refusing to let Ms. Wasser answer
15 whether she or her staff or her
16 co-counsel hid these from Mr. Depp
17 for a period of years after he's
18 made the allegation.

19 MR. PRESIADO: I'm not in a
20 position to instruct the witness
21 not to answer. I'm not her
22 counsel. But I do assert the

14:32:27

14:32:28

14:32:31

14:32:33

14:32:34

14:32:36

14:32:38

14:32:39

14:32:42

14:32:43

14:32:45

14:32:49

14:32:52

14:32:53

14:32:56

14:32:57

14:33:00

14:33:02

1	attorney/client privilege. And as	14:33:05
2	I said, there is no waiver of the	14:33:07
3	attorney/client privilege simply	14:33:11
4	because an allegation is made in	14:33:11
5	the complaint. That would turn	14:33:12
6	the privilege on its head.	14:33:16
7	MS. BREDEHOFT: Ms. Rice,	14:33:20
8	I'm going to ask you to	14:33:21
9	reconsider. Are you instructing	14:33:21
10	your witness not to answer,	14:33:23
11	Ms. Wasser?	14:33:28
12	MS. RICE: Yes.	14:33:29
13	MS. BREDEHOFT: On what	14:33:32
14	basis?	
15	MS. RICE: The information	
16	that you just read into the	14:33:33
17	record, does not say that Wasser,	14:33:34
18	Cooperman & Mandles did anything,	14:33:36
19	including hiding anything. So	14:33:37
20	you're making a leap in order to	14:33:39
21	get behind the privilege.	14:33:43
22	MS. BREDEHOFT: It says by	14:34:02

1 certain members of Mr. Depp's then 14:34:03
2 legal team in 2016, specifically 14:34:06
3 in Paragraph 17. So he's clearly 14:34:09
4 making the allegation that his 14:34:12
5 legal team, which Ms. Wasser has 14:34:14
6 testified is she and her staff and 14:34:16
7 the co-counsel. 14:34:18

8 So I'm going to ask you once 14:34:20
9 again to reconsider the 14:34:21
10 instruction not to answer. 14:34:25

11 MS. RICE: Let's move on. 14:34:28

12 MS. BREDEHOFT: Are you 14:34:33
13 still instructing her not to 14:34:34
14 answer? 14:34:35

15 MS. RICE: Unless I say the 14:34:36
16 magic words, yes, the instructions 14:34:38
17 stands. 14:34:42

R 18 Q. Are you aware -- I'm going 14:34:42
19 to ask you this, Ms. Wasser, did you hide 14:35:16
20 the surveillance camera videos, 14:35:20
21 depositions and other evidence from 14:35:22
22 Mr. Depp? 14:35:24

R 1 A. No. 14:35:27

2 Q. Do you know whether 14:35:28

3 Ms. Klein or Ms. Sutton hid the 14:35:33

4 surveillance camera videos, depositions, 14:35:36

5 or other evidence from Mr. Depp? 14:35:38

6 MR. PRESIADO: Objection. 14:35:42

7 Calls for speculation. 14:35:42

8 MS. BREDEHOFT: Yeah, I

9 asked it badly. Let me ask it 14:35:44

10 differently. 14:35:46

R 11 Q. Are you aware of any facts 14:35:47

12 that would support the claim that your 14:35:49

13 staff hid the surveillance camera videos, 14:35:56

14 depositions and other evidence from 14:35:58

15 Mr. Depp back in 2016? 14:36:01

16 MR. PRESIADO: Objection. 14:36:07

17 Assumes facts not in evidence. 14:36:13

18 MS. RICE: I join in that. 14:36:14

19 There's been no evidence that 14:36:16

20 there's a claim that Wasser, 14:36:17

21 Cooperman & Mandles hid anything. 14:36:19

22 Q. Do you remember the 14:36:29

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1 question, Ms. Wasser? 14:36:30

2 THE WITNESS: If you just 14:36:31

3 would read it back to me, 14:36:32

4 Christine. Only because I can't 14:36:33

5 -- I don't know if I should 14:36:35

6 respond in the affirmative or the 14:36:36

7 negative. 14:36:37

8 (The record is read back by
9 the reporter.) 14:36:58

10 MR. PRESIADO: Same 14:36:58

11 objection. 14:36:59

R 12 A. No. 14:36:59

13 Q. Are you aware of any facts 14:36:59

14 that would support that Mr. Depp was not 14:37:18

15 aware of the surveillance camera videos, 14:37:29

16 depositions or other evidence until 14:37:31

17 sometime in 2018? 14:37:34

18 MS. RICE: Question is 14:37:38

19 unintelligible. 14:37:40

20 MR. PRESIADO: Same 14:37:41

21 objection. 14:37:41

22 MS. RICE: Also assumes 14:37:43

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1 facts not in evidence. 14:37:44

2 A. I also think, if I may 14:37:50

3 interpose my own objection, that 14:37:53

4 answering your question would necessitate 14:37:54

5 me waiving or breaching the 14:37:57

6 attorney/client privilege. 14:38:00

7 MR. PRESIADO: Which 14:38:04

8 Mr. Depp is not doing, so I assert 14:38:05

9 that objection. 14:38:07

10 MS. RICE: On that basis, I 14:38:08

11 instruct you not to answer. 14:38:10

12 THE WITNESS: Okay. 14:38:12

13 Q. Are you aware of -- 14:38:13

14 MS. BREDEHOFT: I'm going to 14:38:32

15 take a five minute break, because 14:38:33

16 I'm going to move forward on this. 14:38:35

17 I need to find a different 14:38:38

18 document. 14:38:39

19 Would you like a 10-minute

20 break?

21 MS. RICE: Five is fine by

22 me.

1 MS. BREDEHOFT: So it's 2:38
2 my time. It's 10:38 your time. 14:39:09
3 Let's reconvene at 10:45 your
4 time. 14:39:12
5 THE VIDEOGRAPHER: We're 14:39:12
6 going off record. The time is 14:39:15
7 14:39. 14:39:17
8 (Whereupon, a short break 14:46:07
9 was taken.) 14:53:28
10 THE VIDEOGRAPHER: We're 14:53:28
11 back on the record. The time is 14:53:36
12 1453. 14:53:38
13 Q. Alright, Ms. Wasser, right 14:53:38
14 before the break there was some 14:53:45
15 discussion and some objections respecting 14:53:47
16 Paragraph 17 of the complaint -- 14:53:50
17 MR. PRESIADO: Okay. I'm
18 back.
19 MS. BREDEHOFT: Oops. I'm
20 sorry. Did I start before you
21 were here?
22 MR. PRESIADO: The

1 formality.

2 MS. BREDEHOFT: Let me just

14:54:09

3 say that again.

14:54:09

R

4 Q. Ms. Wasser, before the

14:54:11

5 break, we were just talking about there

14:54:12

6 were some objections on attorney/client

14:54:18

7 privilege relating to Paragraph 17 of the

14:54:19

8 complaint, and the objection was that we

14:54:23

9 don't know -- I think the objection

14:54:24

10 primarily was that the legal team -- then

14:54:25

11 legal team in 2016 wasn't identified.

14:54:28

R

12 I'm going to read from Mr. Depp's

14:54:31

13 deposition on November 11th of 2020, Page

14:54:34

14 285, Line 13. I brought those to your

14:54:38

15 attention, and I'm talking about the

14:54:45

16 Paragraph 17, the surveillance, camera

14:54:46

17 videos, depositions and other evidence.

14:54:49

18 And his answer was, counsel. Then I

14:54:50

19 said, who were you referring to as

14:54:53

20 Mr. Depp's then legal team in 2016? And

14:54:57

21 Mr. Chu said, you may answer that

14:55:02

22 question. Mr. Depp answered, there were

14:55:04

R;	1	various. Well, there were -- it was	14:55:08
H;			
AA	2	Laura Wasser, who was my divorce	14:55:10
	3	attorney, Blair Berk. Then there were	14:55:13
	4	also Jake Bloom, at the time, Marty	14:55:17
	5	Singer, and then there was a woman named	14:55:20
	6	Patty Glaser.	14:55:22
	7	So I'm going to ask you	14:55:23
	8	again, did you, as alleged in Paragraph	14:55:26
	9	17, hide the obtained surveillance camera	14:55:29
	10	videos, depositions and other evidence	14:55:35
	11	from Mr. Depp until sometime in 2018?	14:55:37
	12	MS. RICE: Objection.	14:55:42
	13	Assumes fact not in evidence that	14:55:43
	14	the claims against Wasser,	14:55:45
	15	Cooperman & Mandles. The	14:55:45
	16	testimony you just read into the	14:55:47
	17	record does not say that he made	14:55:48
	18	that against us. Second of all,	14:55:50
	19	you asked that question before the	14:55:52
	20	break and she already answered it,	14:55:53
	21	so it's asked and answered.	14:55:55
R; H;	22	A. I'll answer again. No.	14:56:00
AA			

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1 Q. Now, I asked you a little 14:56:02
2 bit about the press before. 14:56:10
3 Do you recall there being a 14:56:12
4 specific agreement between the parties in 14:56:14
5 the Depp, Heard divorce matter not to 14:56:19
6 communicate with the press? 14:56:23
7 MR. PRESIADO: Objection, 14:56:24
8 relevance. 14:56:25
9 MS. RICE: Join. 14:56:27
10 A. I believe we probably 14:56:28
11 entered into a confidentiality agreement 14:56:31
12 at the beginning of the case. We usually 14:56:33
13 try to. 14:56:36
14 MS. BREDEHOFT: I'm going to 14:56:40
15 ask Alan to bring up Wasser 14:56:41
16 document number 2. And I think 14:56:53
17 we'll be labeling that as 14:56:57
18 deposition Exhibit number 5. 14:56:59
19 Would that be right? 14:57:03
R 20 THE TECH: That's correct. 14:57:06
21 One moment. 14:57:07
22 MS. BREDEHOFT: Thank you. 14:57:24

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1 (Wasser Exhibit 5 letter
2 dated June 21, 2016 was marked for
3 identification, as of this date
4 December 16, 2020.)
5 Q. Ms. Wasser, I'm going to ask 14:57:29
6 you to take a look at what has been 14:57:31
7 marked as Wasser deposition Exhibit 14:57:32
8 number 5. It's a letter dated June 21, 14:57:36
9 2016 to Samantha Spector, Charles Carter 14:57:39
10 and Leonard Levine, I think it's 14:57:42
11 pronounced, remarriage of Depp, and it's 14:57:44
12 from Samantha Klein; do you see that? 14:57:48
13 A. Mm-hmm. 14:57:53
14 Q. And you are copied on it; do 14:57:54
15 you see that? 14:57:56
16 A. I do. 14:57:56
17 Q. Okay. And Ms. Klein works 14:57:57
18 with your law firm? 14:58:00
19 A. Yes. 14:58:01
20 Q. And represented Mr. Depp as 14:58:02
21 well; is that correct? 14:58:04
22 A. Yes. 14:58:07

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R; 1 Q. And I'm going to go back up 14:58:09
H; 2 to the beginning to call your attention 14:58:11
ICD 2 3 to a particular section. It says, this 14:58:13
4 letter shall confirm the agreements we 14:58:17
5 reached yesterday with respect to the 14:58:19
6 pending domestic violence proceeding; do 14:58:21
7 you see that? 14:58:24
8 A. Mm-hmm. 14:58:24
9 Q. And then you're going to go 14:58:25
10 down to the media press, and it says, 14:58:25
11 neither party nor his or her respective 14:58:29
12 counsel representatives or agents to make 14:58:31
13 any comments in the media or press 14:58:34
14 pertaining to this dissolution action, 14:58:37
15 the civil action pending against 14:58:39
16 Constanope (phonetic). And are any 14:58:43
17 pending or future litigation between our 14:58:44
18 and/or involving the parties; do you see 14:58:46
19 that? 14:58:47
20 A. Yes. 14:58:47
21 Q. Does that accurately reflect 14:58:49
22 the agreement that was made between the 14:58:53

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R;	1	parties with respect to Amber Heard and	14:58:56
ICD	2	Mr. Depp in communications with the	14:58:59
	3	press?	14:59:03
	4	A. Yes.	14:59:03
	5	Q. Do you know Ms. Walters?	14:59:04
	6	A. Who?	14:59:10
	7	Q. Ms. Walters?	14:59:11
	8	A. Yes.	14:59:14
	9	Q. And who is she?	14:59:14
	10	A. She is a reporter.	14:59:16
	11	Q. For?	14:59:19
	12	A. I believe she works for her	14:59:22
	13	brother's online media outlet called The	14:59:24
	14	Blast.	14:59:29
	15	Q. Did you have any	14:59:29
	16	communications with Liz Walters during	14:59:31
	17	the Depp part of the divorce?	14:59:33
	18	MS. RICE: Objection,	14:59:36
	19	relevance.	14:59:37
	20	Q. Relating to the Depp, Heard	14:59:38
	21	divorce?	
	22	MS. RICE: Objection,	

1 relevance. 14:59:45

2 MR. PRESIADO: Same 14:59:46

3 objection. 14:59:46

R; 4 A. I don't recall. 14:59:49

ICD 5 Q. Did you have any 14:59:49

6 communications with TMZ relating to the 14:59:52

7 Depp, Heard divorce? 14:59:56

8 MS. RICE: Objection, 14:59:57

9 relevance. 14:59:58

10 MR. PRESIADO: Same 14:59:58

11 objection. 14:59:59

R; 12 A. I don't recall. 15:00:02

ICD 13 Q. Now, do you recall what the 15:00:02

14 date was for the permanent TRO, temporary 15:00:15

15 restraining order? Do you recall the 15:00:21

16 date that -- you said that early on 21 15:00:23

17 days after the temporary restraining 15:00:25

18 order was typically the date that set the 15:00:27

19 hearing for the defendant if they want to 15:00:29

20 come in and depose it, or if the 15:00:31

21 petitioner wants to extend it; do you 15:00:36

22 recall what the first date was? 15:00:38

R; ICD	1	A. I don't, but I would imagine	15:00:39
	2	it was probably at some point in early	15:00:44
	3	June.	15:00:47
	4	Q. And then do you recall that	15:00:48
	5	date being continued?	15:00:50
	6	A. I do.	15:00:52
	7	Q. How many times?	15:00:53
	8	MS. RICE: Objection,	15:00:56
	9	relevance.	15:00:57
R; ICD	10	A. At least twice. Possibly	15:01:01
	11	three times. I think that the final date	15:01:03
	12	was at some point in August and resettled	15:01:07
	13	right before then.	15:01:10
	14	Q. And why was the date	15:01:12
	15	continued the other two times?	15:01:14
	16	MS. RICE: Objection to the	15:01:17
	17	extent it calls for the disclosure	15:01:18
	18	of attorney/client communications	15:01:22
	19	and/or your attorney work product.	15:01:23
	20	If you can answer without	15:01:26
	21	disclosing that information, you	15:01:28
	22	can answer. Otherwise, you're	15:01:29

1	instructed not to answer.	15:01:30
2	A. So to the extent that I am	15:01:33
3	not disclosing any privileged	15:01:35
4	information, I believe it was because we	15:01:38
5	were engaging in settlement discussions.	15:01:42
6	MS. BREDEHOFT: Alan, can	15:01:53
7	you please bring up Wasser	15:01:54
8	document number 6, which I think	15:01:56
9	is also going to be Wasser Exhibit	15:01:59
10	number 6.	15:02:01
11	(Wasser Exhibit 6 document	
12	was marked for identification, as	
13	of this date December 16, 2020.)	
14	Q. I'm going to show you what	15:03:01
15	has been marked as Wasser deposition	15:03:02
16	Exhibit number 6. And it starts out,	15:03:04
17	which makes it a little bit awkward, it	
18	starts out with this red line version	15:03:11
19	here, and I'm just going to show the	15:03:17
20	dates here on this. And I'm going to go	15:03:28
21	down and just go through it. It's a red	15:03:33
22	line of the marriage of Depp with a	15:03:36

1 number deal point memorandum pursuant to 15:03:41
2 Code of Civil Procedure 664.6, and it has 15:03:46
3 a number of red lines in blue through it. 15:03:51
4 And before I -- if you need to look at 15:03:54
5 it -- the awkward part of doing Zooms, 15:04:00
6 Ms. Wasser, is sometimes it's hard, 15:04:01
7 because it's better to have it in front 15:04:02
8 of you and you could look at what you 15:04:04
9 want to look at. I'm going to ask a 15:04:06
10 couple of general questions first on 15:04:08
11 this. 15:04:10
12 Do you have a recollection 15:04:11
13 of who started the draft of the deal 15:04:13
14 point memorandum; in other words, was 15:04:21
15 that your side or was that Amber Heard's 15:04:22
16 legal team side? 15:04:24
17 A. Yes. 15:04:27
18 Q. I asked which, and you said 15:04:28
19 yes. 15:04:30
20 A. You asked if I had a 15:04:31
21 recollection, and I do. 15:04:32
22 Q. Who started the drafting of 15:04:34

1	the deal point memorandum reflected here?	15:04:37
2	MS. RICE: Objection,	15:04:42
3	relevance.	15:04:44
4	MR. PRESIADO: Also	15:04:45
5	objection to the extent it invades	15:04:46
6	the settlement privilege.	15:04:48
7	A. Well, I was going to ask	15:04:53
8	about that as well. Doesn't this document	15:04:56
9	in and of itself invade 1152? Because	15:04:58
10	only the signed deal memo which then	15:04:59
11	comes in under 664.6 is allowed. The	15:05:03
12	back and forth seems clearly privileged	15:05:07
13	to me. You're not asking about this	15:05:08
14	document yet, Elaine, so okay. But if	15:05:11
15	you're seeking to enter, I won't answer	15:05:13
16	questions about it. In terms of	15:05:15
17	initiating the drafting, that was	15:05:19
18	definitely our firm.	15:05:20
19	Q. Okay. And by the way, the	15:05:21
20	settlement privilege is not a privilege	15:05:25
21	by which you are able to not answer	15:05:27
22	questions in Virginia. We do recognize	15:05:31

1 it's not called a privilege. We 15:05:34
2 recognize settlement communications and 15:05:36
3 frequently they are not admissible, and 15:05:40
4 it depends upon a certain number of 15:05:43
5 factors that have been issued by our 15:05:46
6 Virginia Supreme Court. There's three 15:05:48
7 leading cases on it. So it doesn't 15:05:51
8 prevent, in a deposition, from asking 15:05:53
9 about it. It may or may not cause it not 15:05:55
10 to be admitted ultimately in evidence at 15:05:59
11 trial depending upon the factors. Just 15:06:02
12 so that you understand. 15:06:03
13 MR. PRESIADO: I disagree. 15:06:06
14 One second. I disagree with that. 15:06:08
15 First of all, Ms. Wasser is not 15:06:09
16 subject to the jurisdiction of 15:06:12
17 Virginia law for the purpose of 15:06:15
18 this deposition or otherwise. And 15:06:17
19 she is obligated to abide by 15:06:21
20 California law as a member of the 15:06:24
21 bar of California. 15:06:26
22 MS. BREDEHOFT: My 15:06:29

1	understanding --	15:06:31
2	MS. RICE: I echo that as	15:06:31
3	well.	15:06:33
4	MS. BREDEHOFT: My	15:06:35.
5	understanding of the law is that	15:06:36
6	it's not a privilege in which you	15:06:36
7	can instruct her not to answer.	15:06:39
8	It's an issue of admissibility in	15:06:44
9	your system, which is very	15:06:45
10	different.	15:06:46
11	MS. RICE: Not in	15:06:49
12	California.	15:06:51
13	MS. BREDEHOFT: We don't	15:06:51
14	have to go -- we don't have to	15:06:52
15	waste a lot of time here, because	
16	I only have a few questions.	15:06:54
17	Q. Do you recognize -- are you	15:06:54
18	able to tell me who put the red line into	15:06:56
19	this, whether it was your side or whether	15:07:01
20	it was Amber Heard's legal team?	15:07:04
21	MR. PRESIADO: I object to	15:07:08
22	that question based on the	15:07:09

1	confidential settlement.	15:07:11
2	Privilege. Answering that	15:07:13
3	question would elicit an aspect of	15:07:15
4	a negotiation, which is	15:07:19
5	privileged.	15:07:21
6	MS. RICE: I'd object on the	15:07:22
7	grounds of the mediation	15:07:22
8	privilege, and instruct her not to	15:07:24
9	answer to the extent that you're	15:07:25
10	getting into the substance of the	15:07:26
11	back and forth between the parties	15:07:28
12	that resulted in a settlement in	15:07:29
13	the dissolution action. The	15:07:31
14	mediation privilege in California	15:07:36
15	is very, very strong, and it's	15:07:37
16	clear that it was accepted from	15:07:40
17	the scope of the executed deal	15:07:42
18	memorandum that the mediation	15:07:46
19	privilege as to settlement offers	15:07:48
20	would not -- was not being waived.	15:07:50
21	Q. Do you remember the	15:07:54
22	question?	15:07:56

1	A. I remember that I was	15:07:56
2	instructed not to answer.	15:08:00
3	Q. I don't think that was the	15:08:01
4	instruction. The instruction is if this	15:08:03
5	was part of the mediation. But, in fact,	15:08:04
6	this was not part of the mediation, was	15:08:08
7	it?	15:08:10
8	A. Of course it was.	15:08:10
9	Q. This was not done while you	15:08:13
10	were in mediation?	15:08:16
11	A. Yes, it was.	15:08:18
12	Q. So it physically happened in	15:08:19
13	the office while you were undergoing	15:08:24
14	mediation?	15:08:25
15	A. I believe so. There were	15:08:26
16	many, many drafts of this document which	15:08:28
17	were worked on throughout the day during	15:08:31
18	the mediation at our office.	15:08:35
19	MR. PRESIADO: Also, that is	15:08:40
20	not the limitation of the	15:08:41
21	mediation privilege. To the	15:08:44
22	extent any fruits [inaudible] of	15:08:46

1 the mediation come after the 15:08:48
2 actual formal mediation, they 15:08:49
3 still fall within the mediation 15:08:53
4 privilege. It doesn't have to be 15:08:56
5 that particular day. And, of 15:08:57
6 course, the settlement privilege 15:09:01
7 overarches the mediation 15:09:03
8 privilege. 15:09:06
9 Q. Ms. Wasser? 15:09:07
10 A. Yes. 15:09:07
11 Q. Does your system use this 15:09:09
12 word perfect document compare summary? 15:09:11
13 A. We do. 15:09:15
14 Q. Typically, when you're going 15:09:18
15 back and forth with this kind of a 15:09:20
16 document, would you include this at the 15:09:24
17 beginning? 15:09:27
18 MS. RICE: Vague and 15:09:28
19 ambiguous. 15:09:30
20 A. Yes. 15:09:31
21 Q. And it has a title in here, 15:09:32
22 the Depp, John and then DPM Depp - and 15:09:42

1 the rest of that. 15:09:47

2 Do you know what the DPM 15:09:49

3 means? 15:09:51

4 A. Yes. 15:09:51

5 Q. What does that mean? 15:09:53

6 A. Deal point memo. 15:09:54

7 Q. And is that the title that 15:09:56

8 you would have given to that document? 15:10:00

9 MS. RICE: Really? 15:10:07

10 A. No, but I like it. 15:10:09

11 Q. Alright. 15:10:11

12 A. Like I don't question my 15:10:13

13 attorney, I never question my assistant. 15:10:15

14 Q. That's my other question. 15:10:18

15 Is that typically the type 15:10:20

16 of title that your assistant would give a 15:10:22

17 document? 15:10:26

18 MS. RICE: Since it's not in 15:10:27

19 evidence. 15:10:29

20 A. Yes. 15:10:34

21 MS. BREDEHOFT: Alright. 15:10:39

22 Alan, can we bring up number -- 15:10:40

1 document number seven? 15:10:44

2 Thank you, Alan. 15:10:53

3 (Wasser Exhibit 7 August 5,

4 2016 was marked for

5 identification, as of this date

6 December 16, 2020.)

7 Q. Ms. Wasser, I'm going to ask 15:11:14

8 you to take a look at what has been 15:11:16

9 marked as Wasser Exhibit number 7. It is 15:11:17

10 dated August 5, 2016. It is to you from 15:11:21

11 Samantha Spector; do you see that? 15:11:29

12 A. Yes. 15:11:31

13 Q. Do you recall -- did you 15:11:32

14 receive this document? 15:11:35

15 A. Doesn't it say at the top 15:11:36

16 that's it's protected under 1152? 15:11:45

R; 17 Q. It sure does. All I'm 15:11:47

S; 18 asking you is whether you received it. 15:11:49

IR; 19 I'm not asking you about the substance. 15:11:52

H 20 A. I don't remember. 15:11:53

21 Q. Do you have any reason to 15:11:54

22 believe you did not receive it? 15:11:56

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Conducted on December 16, 2020

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R; H; F/A	1	A. I don't.	15:11:59
	2	MR. PRESIADO: Objection.	15:12:00
	3	Asked and answered.	15:12:01
	4	MS. BREDEHOFT: Let's go to	15:12:02
	5	number -- document number eight.	15:12:02
	6	(Wasser Exhibit 8 e-mail was	
	7	marked for identification, as of	
	8	this date December 16, 2020.)	
R; H; F/A	9	Q. Ms. Wasser, I'm going to ask	15:12:34
	10	you to take a look at what has been	15:12:35
	11	marked as Wasser deposition Exhibit	15:12:37
	12	number 8. And it starts out with a name	15:12:39
	13	now from Samantha Spector to Amber on	15:12:45
	14	August 6, 2016.	15:12:48
	15	Do you recall what was going	15:12:53
	16	on or around August 16 --	15:12:56
	17	MS. RICE: Vague and	15:12:59
	18	ambiguous.	15:13:00
R; H; F/A	19	Q. -- in the divorce --	15:13:00
	20	MS. BREDEHOFT: Please don't	
	21	interrupt me.	
R; H; F/A	22	Q. -- in connection with the	15:13:03

R	1	divorce?	15:13:04
	2	MS. RICE: Vague and	15:13:05
	3	ambiguous.	15:13:06
	4	MR. PRESIADO: Same	15:13:06
	5	objection.	15:13:08
R	6	A. Not specifically, no.	15:13:12
	7	Q. Do you recall whether there	15:13:13
	8	were any depositions scheduled in that	15:13:17
	9	timeframe?	15:13:20
	10	A. I don't. Could I take a	15:13:20
	11	look at this e-mail, please, if you're	15:13:26
	12	going to ask me about it? I have not	15:13:28
	13	seen this before.	15:13:30
	14	Q. Right. Because it's from	15:13:31
	15	Samantha Spector to Amber Heard, and then	15:13:32
	16	Amber Heard sent this on to Christian	15:13:37
	17	Carino.	15:13:41
R	18	Do you know who Christian	15:13:42
	19	Carino is?	15:13:44
	20	A. I do.	15:13:44
	21	Q. Who is he?	15:13:45
	22	A. He's an agent at Creative	15:13:46

R 1 Artist Agency. 15:13:51

2 Q. How long have you known 15:13:51

3 Christian Carino? 15:13:54

4 A. I've known of Christian for 15:13:55

5 maybe ten years. 15:13:59

6 Q. Were you aware that he 15:14:07

7 became -- 15:14:09

8 MR. PRESIADO: Counsel, one 15:14:10

9 second, I believe the deponent 15:14:11

10 wanted to review this, and I'd 15:14:13

11 like to review it also. Can you 15:14:14

12 please have it scrolled up? 15:14:17

13 MS. BREDEHOFT: I will in a 15:14:20

14 minute. I'm still asking some 15:14:21

15 questions about Christian Carino. 15:14:21

16 I'm not asking about the document. 15:14:23

17 Q. Are you aware that 15:14:26

18 Mr. Carino became Mr. Depp's agent? 15:14:26

19 MS. RICE: Objection, 15:14:32

20 relevance. 15:14:32

21 A. No. 15:14:34

R 22 Q. Are you aware that 15:14:37

R; 1 Mr. Carino was involved in organizing, if
AF; 2 you will, or assisting Mr. Depp and
FSPK 3 Ms. Heard with their own meeting to try
4 to resolve their case up in San
5 Francisco?

6 MS. RICE: Objection,
7 relevance.

8 MR. PRESIADO: Also assumes
9 facts not in evidence, and calls
10 for speculation.

R; 11 A. Possibly. That sounds
AF; 12 vaguely familiar.

13 Q. Did there come a time,
14 during the negotiations, that you learned
15 that Amber Heard and Johnny Depp met in a
16 hotel room up in San Francisco to discuss
17 and try to work out their differences?

18 MS. RICE: To the extent
19 that you learned that from your
20 client, you're instructed not to
21 answer.

22 MR. PRESIADO: Same

1 objection. Attorney/client 15:15:35
2 privilege. 15:15:38
3 A. I can't answer any questions 15:15:40
4 about meetings or attempted meetings that 15:15:41
5 the parties may have had, because that 15:15:46
6 information would have been imparted to 15:15:48
7 me by Mr. Depp. 15:15:51

R;
IH

8 Q. Were you on the telephone at 15:15:52
9 any point while Amber Heard and Johnny 15:15:56
10 Depp were meeting to discuss an attempted 15:16:00
11 resolution of the issues during the 15:16:05
12 Summer of 2016? 15:16:07

13 A. What was your question; was 15:16:09
14 I on the telephone? 15:16:13

15 Q. Yes. Were you on the 15:16:14
16 telephone where Mr. Depp and Ms. Heard 15:16:16
17 were in the hotel room, and were talking? 15:16:20

18 A. No. 15:16:23

19 Q. Were you ever on the 15:16:25
20 telephone when Ms. Heard and Mr. Depp 15:16:28
21 were together talking during the Summer 15:16:32
22 of 2016, no matter where they were? 15:16:34

R;	1	A.	On the telephone?	15:16:37
IH	2	Q.	Yes.	15:16:39
	3	A.	No.	15:16:40
	4	Q.	Were you ever in person with	15:16:40
	5		Mr. Depp and Ms. Heard in a room where	15:16:45
	6		other people were not during the Summer	15:16:49
	7		of 2016?	15:16:53
	8	A.	So you're suggesting just	15:16:54
	9		the three of us would have been in a	15:16:58
	10		room?	15:17:01
	11	Q.	Yes.	15:17:01
	12	A.	No.	15:17:02
	13	Q.	Were you ever in a room with	15:17:03
	14		Mr. Depp and Ms. Heard and Christian	15:17:04
	15		Carino and no one else?	15:17:09
	16	A.	No.	15:17:11
R;	17	Q.	Were you ever called by	15:17:11
IH	18		Mr. Depp while he was with Ms. Heard, and	15:17:19
	19		Ms. Heard was on speaker -- and you were	15:17:23
	20		on speakerphone with the two of them?	15:17:27
	21	A.	No.	15:17:29
	22		MR. PRESIADO: Objection.	15:17:30

1	Calls for attorney/client	15:17:32
2	communication.	15:17:36
3	Q. I'm going to go ahead and	15:17:36
4	let you take a look at this. And you	15:17:39
5	will probably want to start with the	15:17:41
6	first part of it. So I'm going to go	15:17:41
7	ahead and let you read that. Tell me	15:17:43
8	when you're ready to move on.	15:17:46
9	A. Right. Scroll down, please.	15:17:53
10	MR. PRESIADO: Slow down,	15:18:02
11	please.	15:18:05
12	MS. BREDEHOFT: I'm going to	15:18:08
13	go with the witness.	15:18:09
14	THE WITNESS: Yes.	15:18:11
15	Q. You're ready?	15:18:13
16	MR. PRESIADO: I'd like to	15:18:16
17	review it also from top to bottom.	15:18:17
18	Can you scroll to the top, please?	15:18:25
19	MS. BREDEHOFT: I'm waiting	15:18:27
20	for the witness. It's her	15:18:28
21	deposition.	15:18:31
22	THE WITNESS: Okay.	15:18:33

1	MR. PRESIADO: Scroll down,	15:18:34
2	please.	15:18:36
3	Q. Ms. Wasser, have you read	15:18:38
4	the top yet?	15:18:40
5	A. I'm done.	15:18:40
6	Q. Were you aware --	15:18:52
7	MR. PRESIADO: Hang on.	15:18:54
8	Hang on, Counsel.	15:18:55
9	MS. BREDEHOFT: I'm sorry,	15:19:00
10	what do you have left?	15:19:01
11	MR. PRESIADO: Also, do you	15:19:19
12	agree with me that this is a	15:19:20
13	communication between Ms. Heard	15:19:20
14	and her attorneys and no third	15:19:23
15	parties?	15:19:25
16	MS. BREDEHOFT: Actually,	15:19:25
17	unfortunately, Ms. Heard sent that	15:19:27
18	on to Christian Carino, which I	15:19:30
19	think makes that a limited waiver,	15:19:32
20	and that you don't have the	15:19:34
21	ability to claim attorney/client	15:19:36
22	privilege on this particular	15:19:39

1 communication, which is why we 15:19:40
2 produced it in discovery. We have 15:19:43
3 different rules in Virginia on 15:19:43
4 attorney -- 15:19:46

5 MR. PRESIADO: That's not 15:19:46
6 why I was asking. I just wanted 15:19:47
7 you to confirm that that's the 15:19:50
8 case. I don't recognize the 15:19:51
9 e-mail, the Joseph e-mail address. 15:19:54
10 Is that an attorney for Ms. Heard? 15:19:56

11 MS. BREDEHOFT: I'm not 15:20:00
12 going to answer your questions in 15:20:01
13 the deposition. 15:20:02

14 MS. RICE: The answer is 15:20:02
15 yes, he was one of the divorce 15:20:04
16 lawyers for her. 15:20:06

17 MR. PRESIADO: Thank you. I 15:20:09
18 finished my review. 15:20:10

19 Q. Ms. Wasser, were you aware 15:20:11
20 of this issue arising in early August 15:20:17
21 of 2016 between Ms. Spector and 15:20:26
22 Ms. Heard? 15:20:27

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Conducted on December 16, 2020

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1 MS. RICE: Vague and 15:20:31

2 ambiguous as to issue. 15:20:32

3 MR. PRESIADO: Objection, 15:20:33

4 vague and ambiguous. 15:20:33

5 A. What issue, Elaine? 15:20:34

R; 6 Q. Were you aware that 15:20:36

SP; 7 Ms. Spector was concerned that Ms. Heard 15:20:38

FSPK; 8 was giving up way more than she was 15:20:40

AF; 9 entitled to in the settlement? 15:20:45

AR; H 10 MS. RICE: Assumes facts not 15:20:48

11 in evidence. 15:20:49

12 MR. PRESIADO: Same 15:20:49

13 objection. 15:20:50

14 MS. RICE: And to the extent 15:20:50

15 it will require you to divulge 15:20:51

16 client/attorney privileged 15:20:53

17 information, don't do so. 15:20:54

18 MR. PRESIADO: Same 15:20:57

19 objections. 15:20:58

R; 20 A. I was not aware. 15:21:00

SP; 21 Q. Do you recognize the name 15:21:01

FSPK; 22 Joe Sweeney? 15:21:08

AF; 23 15:21:08

AR; H 24 15:21:08

R	1	A.	I do.	15:21:09
	2	Q.	And who was he?	15:21:13
	3	A.	Joe Sweeney is a forensic	15:21:14
	4		accountant who specializes in family law	15:21:20
	5		forensic accounting, and he was	15:21:23
	6		Ms. Heard's forensic accountant in the	15:21:26
	7		diso-matter.	15:21:32
	8	Q.	And was Edward White acting	15:21:32
	9		as the forensic accountant for Mr. Depp?	15:21:37
	10	A.	No.	15:21:42
	11	Q.	What was Mr. White's role?	15:21:42
	12	A.	Mr. White was -- is	15:21:45
	13		Mr. Depp's business manager.	15:21:51
	14	Q.	And Mr. White provided the	15:21:54
	15		financial documentation then to	15:21:57
	16		Ms. Heard's counsel?	15:22:02
	17		MS. RICE: Calls for	15:22:04
	18		speculation as phrased.	15:22:05
	19		MR. PRESIADO: Same	15:22:07
	20		objection.	15:22:08
	21	Q.	Do you know?	15:22:09
	22	A.	I do not know.	15:22:11

1 Q. Typically with the 15:22:12
2 financials, would you obtain them and 15:22:15
3 then turn them over to opposing counsel? 15:22:19

4 MS. RICE: Objection as to 15:22:21
5 the word typical. Vague and 15:22:22
6 ambiguous. Assumes a fact not in 15:22:26
7 evidence. 15:22:28

8 MR. PRESIADO: Same 15:22:29
9 objection plus irrelevant. 15:22:30

R; 10 Q. Did Mr. White provide the 15:22:31
SP; 11 documentation that was then submitted to 15:22:44
FSPK; 12 Samantha Spector as counsel for 15:22:47
AF; 13 Ms. Heard? 15:22:49
AR

14 MS. RICE: Calls for 15:22:51
15 speculation, no foundation. 15:22:52

16 MR. PRESIADO: Same 15:22:54
17 objection. 15:22:55

R; 18 A. I believe it came from 15:22:55
SP; 19 Mr. White's office. Also, probably of 15:22:57
FSPK; 20 note is the fact that Mr. Depp changed 15:23:00
AF; 21 business management shortly before or 15:23:03
AR 22 during the course of the case. So it is 15:23:09

R	1	possible that some of the documents came	15:23:11
	2	from predecessor business manager.	15:23:12
	3	Q. What is your recollection of	15:23:15
	4	when that transpired, that shift?	15:23:20
	5	A. Nonexistent.	15:23:24
	6	Q. Your recollection is	15:23:30
	7	nonexistent, is that what you mean by	15:23:33
	8	that answer?	15:23:36
	9	A. I don't know when it	15:23:36
	10	happened or how it happened. My job is	15:23:37
	11	to make sure that it happens at some	15:23:40
	12	point.	15:23:41
	13	Q. Did you work with any other	15:23:42
	14	business manager other than Ed White in	15:23:44
	15	connection with this divorce from	15:23:47
	16	Mr. Depp?	15:23:50
	17	MS. RICE: Objection,	15:23:50
	18	relevance.	15:23:51
	19	A. Early on I believe I did.	15:23:55
R	20	Q. What is your understanding	15:23:57
	21	of what a back end deal is?	15:24:03
	22	MS. RICE: Calls for	15:24:06

1 speculation as phrased. 15:24:06

2 MR. PRESIADO: Same 15:24:10

3 objection. 15:24:10

4 MS. RICE: Irrelevant what 15:24:12

5 her understanding of anything is 15:24:15

6 with respect to this. 15:24:17

R; 7 A. A back end deal in the 15:24:19

IO; 8 entertainment industry is when the person 15:24:20

ET; 9 who enters into that deal receives 15:24:26

FSPK 10 profits and receipts after the television 15:24:29

11 show or film is produced and aired based 15:24:34

12 on profits that come in later. Hence the 15:24:39

13 back end. 15:24:43

14 Q. And what, if any, impact 15:24:45

15 does that have on the community property 15:24:49

16 distribution? 15:24:51

17 MS. RICE: Question is 15:24:52

18 absolutely unintelligible, 15:24:54

19 incomplete hypothetical, vague and 15:24:55

20 ambiguous, irrelevant. 15:24:57

21 MR. PRESIADO: Same 15:25:00

22 objections. 15:25:00

1	A. In this case or in any case?	15:25:07
2	Q. Whichever you're more	15:25:11
3	comfortable answering.	15:25:13
4	A. California --	15:25:14
5	MS. RICE: Objection, now	15:25:15
6	compound.	15:25:18
7	MR. PRESIADO: And even more	15:25:20
8	vague and ambiguous then when	15:25:27
9	first stated.	15:25:32
10	A. I'm not sure I understand	15:25:36
11	what you are asking, Elaine.	15:25:37
12	Q. Well, since you said in this	15:25:38
13	case or generally, I was going to give	15:25:41
14	you the choice on whichever one you	15:25:44
15	wanted to answer. But I said, what role	15:25:45
16	does back end deals play in community	15:25:49
17	property distribution? If you'd like to	15:25:51
18	do it in the context of this case, go	15:25:55
19	right ahead.	15:25:56
20	MS. RICE: The question is	15:25:56
21	unintelligible. It's vague and	15:25:58
22	ambiguous. It's irrelevant as to	15:26:00

1 what -- as to back end deals 15:26:01

2 generally or specifically. 15:26:04

3 MR. PRESIADO: Same 15:26:07

4 objections. Elaine, why don't you 15:26:08

5 parse the two ideas and ask them 15:26:10

6 separately? 15:26:13

7 MS. RICE: Why don't we move 15:26:14

8 on to a question that is relevant? 15:26:14

9 Just a thought. 15:26:16

10 Q. Ready to answer the 15:26:21

11 question, Ms. Wasser? 15:26:23

12 A. I'm not, because I still 15:26:24

13 don't really understand what you're 15:26:25

14 asking, and as phrased your question is 15:26:26

15 compound. So I'm not really sure what it 15:26:29

16 is you'd like. I'm not willing to answer 15:26:30

17 questions about this case specifically. 15:26:33

R; 18 But if you want to know some generally in 15:26:35

IU; 19 California what the law is, here it is, 15:26:37

IH; 20 in California any services performed 15:26:40

VA; 21 during the marriage, an income therefrom 15:26:44

SP 22 is community property. You want to apply 15:26:47

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R; IU; IH; 1 VA; SP	it to this case, go ahead.	15:26:47
2	Q. And what role does back end	15:26:50
3	deals play in community property?	15:26:53
4	MS. RICE: The question is	15:26:57
5	unintelligible as phrased.	15:26:59
6	MR. PRESIADO: Same	15:27:02
7	objection, and vague and	15:27:02
8	ambiguous.	15:27:02
9	MS. RICE: Complete	15:27:03
10	hypothetical.	15:27:04
11	MR. PRESIADO: And calls for	15:27:05
12	speculation.	15:27:07
13	MS. RICE: Irrelevant.	15:27:09
14	MR. PRESIADO: And	
15	irrelevant.	
16	A. Didn't like that question.	15:27:10
17	I don't know.	15:27:11
18	Q. Well, are back end deals	15:27:12
19	generally part of the community property	15:27:16
20	split?	15:27:19
21	MS. RICE: The question is	15:27:19
22	unintelligible. It's an	15:27:19

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1	incomplete hypothetical.	15:27:21
2	MS. BREDEHOFT: Can you let	15:27:26
3	me finish my question before you	
4	start. Really. We behave a lot	15:27:26
5	differently in Virginia. This has	
6	been quite a disconcerting	15:27:30
7	deposition for me.	15:27:31
8	Q. So can you just tell me,	15:27:32
9	Ms. Wasser --	15:27:33
10	MS. RICE: I agree it has	15:27:35
11	been a disconcerting deposition.	15:27:36
12	Because I don't think you	15:27:39
13	understand that these people	15:27:41
14	settled their divorce. It's a	15:27:42
15	complete release. And the fact	15:27:44
16	that apparently Ms. Heard wants to	15:27:44
17	relitigate the divorce litigation,	15:27:47
18	I don't think the judge in	15:27:49
19	Virginia is going to let you do,	15:27:49
20	and it certainly is not cause to	15:27:51
21	require Ms. Wasser to spend a	15:27:55
22	whole day answering questions	15:27:56

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1	about a case that is over, done	15:27:58
2	with, released and settled.	15:28:00
3	MS. BREDEHOFT: We would	15:28:04
4	have been done two hours ago but	15:28:04
5	for all of your objections and	15:28:08
6	interference.	15:28:09
7	Q. In any event, Ms. Wasser,	15:28:09
8	let's go on.	15:28:10
9	So is a back end deal	15:28:11
10	considered part of the community property	15:28:15
11	when factoring in the split?	15:28:17
12	MS. RICE: The question is	15:28:19
13	unintelligible. It assumes facts	15:28:21
14	not in evidence. It is an	15:28:22
15	incomplete hypothetical, and it's	15:28:23
16	not relevant.	15:28:25
17	MR. PRESIADO: Same	15:28:28
18	objections, and calls for legal	15:28:29
19	conclusion.	15:28:30
20	A. All of that being said, it	15:28:33
21	would depend on the facts of the case.	15:28:34
22	Q. What do you mean by that?	15:28:36

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1	MS. RICE: Same objections.	15:28:39
2	A. If a back end deal is made,	15:28:42
3	and the terms performed during the term	15:28:44
4	of the marriage, and yes, possibly the	15:28:48
5	back end deal could be considered as part	15:28:50
6	of the community property split. Again,	15:28:53
7	there are other intervening circumstances	15:28:56
8	that could come to pass, particularly in	15:28:58
9	situations where there are sequels, and	15:29:02
10	post-separation services rendered in	15:29:05
11	terms of promotion, press junkets, et	15:29:08
12	cetera.	15:29:15
13	Q. If the exceptions that you	15:29:15
14	were just talking about at the end of	15:29:18
15	press junkets, the sequels, et cetera, if	15:29:19
16	those are performed outside of the time	15:29:22
17	of the marriage, then they are not	15:29:24
18	considered part of the community	15:29:27
19	property; is that correct?	15:29:29
20	A. It totally --	15:29:30
21	MS. RICE: Objection.	15:29:31
22	MR. PRESIADO: Objection.	15:29:33

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1	Vague and ambiguous. Calls for	15:29:34
2	speculation. Calls for a legal	15:29:36
3	conclusion.	15:29:38
4	A. It depends on the deal.	15:29:41
5	Q. And what do you mean by	15:29:42
6	that?	15:29:47
7	MS. RICE: Same objections.	15:29:48
8	MR. PRESIADO: Same	15:29:51
9	objection plus relevance.	15:29:52
10	A. You've mixed two topics.	15:29:53
11	One is back end deals, and one is	15:29:54
12	post-separation services.	15:29:57
13	So, again, I don't know what	15:30:00
14	a back end deal would look like, and I	15:30:01
15	certainly don't know in this case what it	15:30:03
16	did look like, because we never ever got	15:30:05
17	to that point. In terms of	15:30:07
18	post-separation services, those would	15:30:08
19	always be post-separation income if	15:30:11
20	they're being compensated for, again,	15:30:15
21	after the date of separation. Same with	15:30:18
22	services performed prior to marriage.	15:30:24

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1	Q. I'm sorry, could you just	15:30:30
2	explain what you mean by that?	15:30:32
3	MS. RICE: Same objections.	15:30:35
4	A. Anything that is performed	15:30:36
5	prior to marriage or after the date of	15:30:37
6	separation is deemed post-separation	15:30:39
7	services, and for those individuals are	15:30:42
8	compensated separately and differently.	15:30:45
9	I think I need to take a	15:30:47
10	break, because I'm being tested and I	15:30:48
11	need them to swab my nose quickly. I	15:30:50
12	apologize for the delay. We will go	15:30:54
13	fast.	15:30:56
14	MS. BREDEHOFT: Let's do ten	15:30:57
15	minutes. Do you want fifteen,	15:30:58
16	Ms. Wasser?	15:30:59
17	THE WITNESS: Ten is fine.	15:31:01
18	I want to keep this moving. I got	15:31:02
19	a lot to do today. Thank you.	15:31:05
20	MS. BREDEHOFT: Me too.	15:31:05
21	Thanks.	15:31:07
22	THE VIDEOGRAPHER: We're	15:31:07

1	going off record. The time is	15:31:07
2	1531.	15:31:10
3	(Whereupon, a short break	
4	was taken.)	15:42:52
5	THE VIDEOGRAPHER: We're	15:42:52
6	back on the record. We're back at	15:42:56
7	1542.	15:42:58
8	MS. BREDEHOFT: Alan, could	15:43:02
9	you bring up document number nine,	15:43:03
10	and we'll call that Wasser	15:43:05
11	deposition Exhibit number 9.	15:43:07
12	(Wasser Exhibit 9 e-mail was	
13	marked for identification, as of	
14	this date December 16, 2020.)	
15	Q. Ms. Wasser, I'm going to	15:43:28
16	show you what has been marked now as	15:43:30
17	Wasser Exhibit number 9. And I'm going	15:43:34
18	to start you with an e-mail chain between	15:43:37
19	you and Samantha Spector. So I'm going	15:43:39
20	to start at the bottom so that you can	15:43:44
21	read up. It started with a letter to	15:43:46
22	Samantha and then on August 11 is the key	15:43:50

1	here. And just while we're here, Blair	15:43:54
2	Berk is who?	15:43:59
3	A. I believe you read out from	15:44:08
4	Mr. Depp's testimony that she was one of	15:44:09
5	his legal team.	15:44:13
6	Q. Did you ever work with Blair	15:44:13
7	Berk?	15:44:15
8	A. Oh, yes.	15:44:16
9	Q. So you didn't need	15:44:17
10	Mr. Depp's deposition testimony to	15:44:19
11	know --	15:44:21
12	MS. RICE: Counsel, move on.	15:44:21
13	Q. Do you recall my question?	15:44:25
14	A. I don't think you finished	15:44:27
15	your --	
16	MS. RICE: Counsel, ask a	15:44:29
17	new question.	15:44:30
18	MS. BREDEHOFT: Christine,	
19	can you read it back, please?	
20	(The record is read back by	
21	the reporter.)	15:44:31
22	Q. -- to be able to answer my	15:44:31

1	question on who Blair Berk is, correct?	15:44:46
2	MS. RICE: That's	15:44:49
3	argumentative. It's harassment.	15:44:50
4	I'm instructing her not to answer.	15:44:51
5	Move on.	15:44:53
6	Q. Do you know who Blair Berk	15:44:54
7	is on your own?	15:44:55
8	A. I do.	15:44:56
9	MS. RICE: Asked and	15:44:57
10	answered.	15:44:58
11	Q. Who is she?	15:44:58
12	A. She's an attorney here in	15:44:59
13	Los Angeles.	15:45:05
14	Q. Does she work for your firm	15:45:06
15	or another firm?	15:45:08
16	A. Works for her own firm.	15:45:09
17	It's called Tarlow and Berk.	15:45:13
18	Q. Thank you. Who is Carrie	15:45:14
19	Wright?	15:45:16
20	MS. RICE: Objection,	15:45:16
21	relevance.	15:45:19
22	A. Carrie Wright is an attorney	15:45:19

1	who works at the Glaser Weil firm.	15:45:21
2	Q. Which also represented	15:45:25
3	Mr. Depp at that time?	15:45:29
4	A. Correct.	15:45:30
5	Q. Then we go up. And we have	15:45:30
6	-- who is Linda Bigbee?	15:45:35
7	A. She's one of the legal	15:45:37
8	assistants at Wasser, Cooperman &	15:45:41
9	Mandles.	15:45:45
10	Q. And then I'll take you up so	15:45:45
11	you could read the next one, and this	15:45:48
12	appears to be from you on August 11 to	15:45:50
13	Samantha. I'll just let you read it.	15:45:54
14	Let me know when you're ready, and I can	15:45:59
15	keep moving up.	15:46:04
16	A. Okay.	15:46:12
17	Q. And then that's the next	15:46:13
18	response back.	15:46:19
19	A. Okay.	15:46:29
20	Q. Then that's your next	15:46:31
21	answer. That's from you.	15:46:37
22	A. Okay.	15:46:43

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1	Q. Then this says from Samantha	15:46:43
2	Spector to you. Let me know if I'm	15:46:54
3	moving too fast.	15:47:07
4	A. Got it.	15:47:12
5	Q. I think that's it.	15:47:13
6	Have you -- is there	15:47:18
7	anything else you want to look at again	15:47:20
8	on this before I ask you questions?	15:47:23
9	A. I guess that depends what	15:47:24
10	the questions are.	15:47:26
11	Q. It's fair, but I just wanted	15:47:27
12	to make sure that you have read every	15:47:29
13	piece.	15:47:31
14	Do you recall this e-mail	15:47:33
15	exchange?	15:47:35
16	MS. RICE: Objection,	15:47:36
17	relevance.	15:47:37
18	MR. PRESIADO: Same	15:47:39
19	objection.	15:47:40
20	A. Vaguely.	15:47:42
21	Q. What was going on -- what	15:47:43
22	were the issues that were going on	15:47:45

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1	August 11?	15:47:47
2	MS. RICE: Objection,	15:47:49
3	utterly irrelevant.	15:47:55
4	MR. PRESIADO: Same	15:47:55
5	objection.	15:47:56
6	A. I believe there was an	15:48:02
7	ex parte hearing regarding scheduling	15:48:03
8	depositions that was noticed for Friday,	15:48:07
9	August 12. I believe that we had agreed	15:48:11
10	to make the deposition on a Saturday to	15:48:16
11	accommodate Ms. Heard. I believe that	15:48:21
12	notwithstanding this, Ms. Spector was	15:48:25
13	still planning on going to court on the	15:48:30
14	Friday, and again, notwithstanding the	15:48:33
15	fact that as set forth in this e-mail	15:48:36
16	chain, we had agreed to take the	15:48:39
17	deposition on Saturday. This was --	15:48:40
18	that's it.	15:48:49
19	Q. Ultimately what happened?	15:48:49
20	MS. RICE: Objection,	15:48:54
21	relevance. Vague and ambiguous.	15:48:55
22	MR. PRESIADO: Same	15:48:57

1 objection. 15:48:58

2 A. I don't recall. I'm almost 15:49:03

3 positive that we did take Ms. Heard's 15:49:08

4 deposition on a weekend. I can't be sure 15:49:11

5 that it was on the 13th. I don't recall 15:49:13

6 whether we ended up having to go to court 15:49:18

7 for what seems like it would have been an 15:49:22

8 unnecessary ex parte application. 15:49:24

9 Q. Okay. 15:49:27

10 MS. BREDEHOFT: Alan, could 15:49:29

11 you take this one down, please? 15:49:30

12 And then bring up Wasser number 15:49:31

13 ten. 15:49:33

R 14 (Wasser Exhibit 10 was 15:49:33

15 marked for identification, as of

16 this date December 16, 2020.)

17 Q. I'm going to show you what 15:49:59

18 has been marked as Wasser deposition 15:50:02

19 Exhibit number 10. And I'm not going to 15:50:04

20 ask you any specific questions. So I 15:50:07

21 don't need you to have to review it in 15:50:10

22 detail unless you'd like to, and you're 15:50:14

1 certainly welcome to spend as much time 15:50:16
2 as you'd like on it. But I'm just going 15:50:18
3 to go down to the end of it. 15:50:19
4 And I'm going to ask if this 15:50:22
5 is the deal point memorandum that you 15:50:28
6 referred to that was finalized on 15:50:31
7 August 15, 2016? 15:50:33
8 A. Since the parties signatures 15:50:34
9 appear at the bottom as well as 15:50:42
10 Ms. Spector's and mine, I believe that 15:50:45
11 this is the deal point memorandum that to 15:50:46
12 which I was referring. 15:50:49
13 Q. Is there any reason to 15:50:50
14 believe that it is not the final deal 15:50:53
15 point memorandum? 15:50:57
16 A. No. 15:50:58
17 Q. And just to make sure that 15:50:59
18 we double verify this, I'm just going to 15:51:03
19 direct your attention to one of these 15:51:07
20 lines; is that a system from your office 15:51:10
21 that's used by your system, that document 15:51:14
22 numbering system? 15:51:17

1 A. No. We don't have a system, 15:51:19
2 but that looks like something that could 15:51:23
3 be -- we don't have any kind of a typical 15:51:27
4 system that we use. But that doesn't 15:51:30
5 look unfamiliar to me, or doesn't raise 15:51:31
6 suspicions that this isn't the document 15:51:34
7 that you said it is. 15:51:36

8 Q. Great. Thank you. 15:51:38

R 9 MS. BREDEHOFT: Alan, can 15:51:41
10 you pull up Wasser number eleven, 15:51:43
11 please? And that will be marked 15:51:48
12 Wasser Exhibit number 11. 15:51:50
13 (Exhibit 11 documents were
14 marked for identification, as of
15 this date December 16, 2020.) 15:52:12

16 Q. Ms. Wasser, I'm going to ask 15:52:12
17 you to take a look at what has been 15:52:14
18 marked as Wasser deposition Exhibit 15:52:16
19 number 11. And it's a series of 15:52:18
20 documents. An FL150, for example, and 15:52:23
21 then that's Page 4 of 4, and then it goes 15:52:32
22 into the next part one of one. Just 15:52:36

1 trying to page through it for you just so 15:52:55
2 you can see generally. 15:52:57
3 Do you recognize this 15:53:12
4 document? 15:53:12
5 A. Yes. 15:53:14
6 Q. Could you tell me what it 15:53:15
7 is, please? 15:53:17
8 A. It looks to be one of the 15:53:18
9 parties, I guess, Mr. Depp's what we call 15:53:20
10 in California, preliminary or perhaps 15:53:24
11 final declaration of disclosure. 15:53:26
12 Financial disclosure forms. 15:53:29
13 Q. Do you recall whether you 15:53:30
14 filed both preliminary and a final in 15:53:33
15 this case? 15:53:36
16 MS. RICE: Objection. 15:53:37
17 Assumes facts not in evidence as 15:53:38
18 to filing. 15:53:40
19 MR. PRESIADO: Objection, 15:53:42
20 relevance. 15:53:43
21 MS. BREDEHOFT: Actually, 15:53:44
22 that's actually a valid objection. 15:53:44

1 Let me rephrase it. 15:53:48

2 MS. RICE: I made one valid 15:53:58

3 objection. My day is done. Let's 15:53:58

4 quit for the day. 15:54:01

5 Q. Do you recall providing to 15:54:01

6 the other side both a preliminary and a 15:54:08

7 final disclosure in this case? 15:54:13

8 A. I don't. 15:54:15

R 9 MS. BREDEHOFT: I'm going to 15:54:23

10 ask you, Alan, if you can go to 15:54:24

11 Wasser document number 12. And 15:54:29

12 that will be marked as Exhibit 15:54:48

13 number 12. Thank you. 15:54:50

14 (Exhibit 12 document was

15 marked for identification, as of

16 this date December 16, 2020.)

17 Q. Ms. Wasser, I'm going to ask 15:55:00

18 you if you can take a look at what has 15:55:02

19 been marked as Wasser Exhibit number 12, 15:55:04

20 and it's many pages. I think it's 50 15:55:14

21 total. 15:55:24

22 Do you recognize this 15:55:26

1 document? 15:55:27

2 A. Yes. 15:55:30

3 Q. Can you tell me what it is? 15:55:32

4 A. It's parties awarded 15:55:33

5 judgment for dissolution of marriage. 15:55:36

R; 6 Q. And I'm going to ask you to 15:55:39

H; 7 turn to this Section 2. I guess you 15:55:47

IR 8 can't turn to it, because it's not in 15:55:52

9 front of you. Section 2.1, which has the 15:55:54

10 settlement of claims and it says, it is 15:55:58

11 further -- the further mutual wish and 15:56:02

12 desire of the parties to completely 15:56:06

13 resolve any and all issues regarding 15:56:08

14 petitioner's claims of domestic violence, 15:56:10

15 including any and all related claims of 15:56:13

16 assault, battery, intentional or 15:56:15

17 negligent infliction of emotional 15:56:17

18 distress, liable slander and/or 15:56:18

19 defamation; do you see that? 15:56:21

20 A. I do. 15:56:24

21 Q. And, in fact, did this 15:56:24

22 judgment fully mutually release the 15:56:26

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R; H; IR	1	parties including Ms. Heard releasing	15:56:31
	2	these claims against Mr. Depp?	15:56:35
	3	MR. PRESIADO: Objection.	15:56:37
	4	Calls for a legal conclusion.	15:56:38
	5	MS. RICE: Objection.	15:56:42
	6	MR. PRESIADO: Document	15:56:42
	7	speaks for itself.	15:56:43
	8	A. Well, it says that it did.	15:56:48
	9	Q. Was there any amount that	15:56:50
	10	was paid to Ms. Heard to settle the	15:56:56
	11	claims of domestic violence, assault,	15:57:02
	12	battery, intentional, negligent	15:57:06
	13	infliction of emotional distress, liable	15:57:09
	14	slander and/or defamation?	15:57:11
	15	MR. PRESIADO: Objection,	15:57:14
	16	vague and ambiguous. Document	15:57:16
	17	speaks for itself. Calls for a	15:57:17
	18	legal conclusion.	15:57:21
	19	Q. Do you understand the	15:57:23
	20	question?	15:57:24
	21	A. No. Can you please repeat	15:57:24
	22	it?	15:57:27

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R; 1 Q. Was there a specific amount 15:57:27
IU;
IH; 2 that was paid to Amber Heard as part of 15:57:32
VA;
SP 3 this divorce settlement and judgment for 15:57:35
4 her claims of domestic violence including 15:57:44
5 any claims of assault, battery, 15:57:47
6 intentional or negligent infliction of 15:57:50
7 emotional distress, liable slander and/or 15:57:51
8 defamation? 15:57:55

9 MR. PRESIADO: Objection. 15:57:56
10 Document speaks for itself. 15:57:57
11 Calls for a legal conclusion, 15:57:58
12 compound. 15:58:00

R; 13 A. I don't believe that we 15:58:04
IU;
IH; 14 segregated out what the total amount was 15:58:05
VA;
SP 15 being paid for. 15:58:09

16 Q. Did you have any 15:58:10
17 understanding of any amount that was a 15:58:15
18 portion as being paid to settle these 15:58:19
19 claims that -- 15:58:23

20 MS. RICE: Objection. 15:58:25
21 Violates the mediation privilege 15:58:28
22 evidence code Section 1152, 15:58:29

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1	attorney/client privilege and	15:58:32
2	attorney work product.	15:58:35
3	MR. PRESIADO: Same	15:58:38
4	objections.	15:58:38
5	MS. RICE: If you could	15:58:39
6	answer it without disclosing your	15:58:39
7	mental impressions, conclusions,	15:58:42
8	thoughts, et cetera, and/or	15:58:44
9	communications with your client,	15:58:47
10	you can do so.	15:58:48
11	MR. PRESIADO: I adopt those	15:58:51
12	objections and add calls for a	15:58:54
13	legal conclusion. And the	15:58:55
14	document speaks for itself.	15:58:56
15	A. Perhaps most importantly, I	15:59:00
16	can't answer without either revealing	15:59:02
17	conversations that I had with my client	15:59:06
18	or our work product impressions, et	15:59:07
19	cetera.	15:59:11
20	Q. I'm going to ask one more	15:59:11
21	question about this.	15:59:13
22	What was the consideration	15:59:14

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1 given for Ms. Heard to release the claims 15:59:17
2 of domestic violence including all 15:59:23
3 related claims of assault, battery, 15:59:25
4 intentional or negligent infliction of 15:59:27
5 emotional distress, liable slander and/or 15:59:30
6 defamation? 15:59:34

7 MS. RICE: Same objections. 15:59:34
8 Same instruction to the extent it
9 would require you to disclose 15:59:36
10 privileged information or work 15:59:38
11 product. It's also vague and 15:59:40
12 ambiguous. 15:59:46

13 MR. PRESIADO: Same 15:59:46
14 objections. 15:59:46

15 A. I don't see much of a 15:59:48
16 distinction between that and your earlier 15:59:49
17 questions, Elaine. I'm sorry, I can't 15:59:51
18 answer it without disclosing a bigger 15:59:53
19 picture, impressions of work product and 15:59:57
20 what went into this settlement. 15:59:58

R;IU; 21 Q. If Mr. Depp testified in his 16:00:00
IH;VA;
SP 22 deposition that no part of the \$7,000,000 16:00:07

Transcript of Laura Allison Wasser, Corporate Designee
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R;	1	was to -- was as a result of Amber Heard	16:00:11
IU;			
IH;	2	making these claims, do you have any	16:00:19
VA;			
SP	3	reason to dispute that?	16:00:23
	4	MS. RICE: Same instructions	16:00:26
	5	to the extent it would require you	16:00:28
	6	to divulge attorney/client	16:00:28
	7	privilege communications, attorney	16:00:31
	8	work product, or to violate the	16:00:33
	9	mediation privilege or evidence	16:00:35
	10	Code Section 1152.	16:00:36
	11	MR. PRESIADO: I adopt those	16:00:39
	12	and also assumes facts not in	16:00:40
	13	evidence. And as phrased, calls	16:00:42
	14	for speculation.	16:00:44
R;IU;	15	A. I can't answer that	16:00:47
IH;			
VA;	16	question.	16:00:48
SP			
	17	Q. Now, after -- you testified	16:00:48
	18	earlier today about once this judgment is	16:00:55
	19	filed, I don't want to put words in your	16:00:58
	20	mouth, pretty much your work is done,	16:01:02
	21	unless there's something attending to; is	16:01:05
	22	that accurate?	16:01:08

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1	A.	Accurate enough.	16:01:08
2	Q.	So if this was filed	16:01:10
3		June 13, then when approximately would	16:01:13
4		your representation of Mr. Depp had	16:01:20
5		concluded?	16:01:24
6	A.	It was filed January 13th.	16:01:24
7	Q.	What did I say?	16:01:26
8		MR. PRESIADO: Also, object	16:01:28
9		to the extent it calls for a legal	16:01:29
10		conclusion.	16:01:30
11	Q.	Let me ask it again. I must	16:01:36
12		have misspoken.	
13		If this was filed	16:01:40
14		January 13, 2017, when effectively did	16:01:42
15		your representation with Mr. Depp end,	16:01:50
16		roughly?	16:01:53
17		MR. PRESIADO: Objection to	16:01:53
18		the extent it calls for a legal	16:01:56
19		conclusion.	16:01:56
20	A.	It also would probably call	16:02:00
21		for a waiver of attorney/client	16:02:03
22		privilege. I can't really answer that.	16:02:05

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1 Q. Okay. 16:02:08

2 MR. PRESIADO: I object on 16:02:08

3 that basis as well. 16:02:09

4 Q. Did you make any effort to 16:02:10

5 seal the records in this case? 16:02:16

6 MR. PRESIADO: I'm sorry, I 16:02:21

7 missed that. 16:02:22

8 Q. Did you make any effort to 16:02:23

9 seal the records in this case, and by 16:02:26

10 this case -- 16:02:29

11 MR. PRESIADO: Did you say 16:02:36

12 steal or seal? 16:02:38

13 THE WITNESS: Seal. 16:02:38

14 MS. BREDEHOFT: I absolutely 16:02:38

15 did not ask her if she tried to 16:02:38

16 steal the records. 16:02:38

17 MR. PRESIADO: I was hoping 16:02:43

18 that was the case. 16:02:44

19 MS. BREDEHOFT: Let me ask a 16:02:44

20 clean question there. 16:02:44

R 21 Q. Did you make any effort to 16:02:46

22 seal S-E-A-L the records in this case, 16:02:48

R 1 and I'm referring to the case in front of 16:02:54
2 us, the marriage or partnership of Amber 16:02:57
3 Laura Depp and John Christopher Depp II, 16:03:04
4 filed in Superior Court of California out 16:03:06
5 in Los Angeles? 16:03:12
6 A. When you say sealed, do you 16:03:12
7 mean by the Court, to ask the Court to 16:03:15
8 seal the file? 16:03:17
9 Q. Yes. 16:03:18
10 A. I don't believe so. 16:03:19
11 Q. Why not? 16:03:20
12 A. We don't do that. 16:03:22
13 MS. RICE: Wait, wait. That 16:03:28
14 actually calls for attorney work 16:03:30
15 product. I'm going to instruct 16:03:32
16 you not to answer. 16:03:33
17 MR. PRESIADO: And may call 16:03:34
18 for attorney/client 16:03:34
19 communications, and I would object 16:03:37
20 on that basis. 16:03:39
21 A. Our efforts to do so would 16:03:44
22 likely have not been fruitful. 16:03:47

1 Q. Are you able to answer it 16:03:49
2 any further than that, or based on your 16:03:52
3 attorney's instructions, are you not 16:03:55
4 answering it further than that? 16:03:57

5 A. The latter. 16:03:59

R 6 MS. BREDEHOFT: Alan, can 16:04:05

7 you bring up documents number 13? 16:04:06

8 (Exhibit 13 Subpoena was

9 marked for identification, as of

10 this date December 16, 2020.)

11 Q. I'm going to ask you to 16:04:45

12 take a look at what has been marked 16:04:47

13 as deposition Exhibit number 13. And 16:04:48

14 this is a subpoena of you for this 16:04:57

15 deposition. 16:05:02

16 Did you receive that? Do 16:05:03

17 you want me to scroll through it? 16:05:11

18 A. No. I believe that we 16:05:13

19 received it. 16:05:15

20 Q. And you are testifying 16:05:15

21 pursuant to this subpoena, correct? 16:05:19

22 A. I am. 16:05:21

R 1 MS. BREDEHOFT: I'm going to 16:05:24
2 ask you to now, Alan, if you can 16:05:24
3 go to number 14. 16:05:29
4 (Exhibit 14 corporate
5 designee was marked for
6 identification, as of this date
7 December 16, 2020.) 16:05:57

R, H, F 8 Q. I'm going to ask you to look 16:05:57
9 at what has been marked as deposition 16:05:59
10 Exhibit number 14. And this is for the 16:06:01
11 corporate designee of Wasser, Cooperman & 16:06:06
12 Mandles; do you see that -- 16:06:10

13 A. I do. 16:06:11

14 Q. -- for today's deposition? 16:06:12

15 Is it your understanding 16:06:18

16 that you are the corporate designee on 16:06:19

17 behalf of Wasser, Cooperman & Mandles 16:06:22

18 speaking today? 16:06:26

19 A. Yes. 16:06:26

20 Q. Okay. And if we can go down 16:06:28

21 to the topics here. 16:06:40

22 Was it your understanding 16:06:42

1	that you were here to be able to testify	16:06:43
2	to the topic areas of one through five	16:06:49
3	here?	16:06:51
4	MS. RICE: Subject to the	16:06:55
5	objections that were served?	16:06:56
6	A. Subject to the objections	16:07:02
7	that were served, Elaine?	16:07:05
8	Q. I don't answer questions.	16:07:05
9	I'm just asking you. If you understood	16:07:06
10	them.	16:07:08
11	A. I understood them subject to	16:07:08
12	the objections that were served.	16:07:12
13	Q. What do you mean by you	16:07:14
14	understood that you were testifying to	16:07:16
15	the subject of the objections that were	16:07:18
16	served?	16:07:20
17	A. That I would answer	16:07:21
18	questions and give testimony to the best	16:07:24
19	of my ability notwithstanding any	16:07:26
20	objections that we had that you	16:07:30
21	received.	16:07:32
22	Q. Is it your understanding	16:07:33

1 that you were not required to prepare for 16:07:35
2 and speak to any of these topic areas 16:07:44
3 based on the objections that were 16:07:47
4 submitted? 16:07:50

5 MS. RICE: Question is 16:07:50
6 unintelligible. 16:07:51

7 A. I'm not sure what you're 16:07:59
8 asking me. Is it my understanding that I 16:08:01
9 was not required? 16:08:04

10 Q. Right. Was it your 16:08:06
11 understanding that you were off the hook 16:08:07
12 h-o-o-k, if you will? I used a little 16:08:15
13 bit of slang there. Sorry about that. 16:08:16
14 Maybe they don't do that in California. 16:08:19
15 I don't know. 16:08:21

16 But is it your understanding 16:08:22
17 that you were off the hook, if you 16:08:24
18 will, on having to testify as to any of 16:08:27
19 these topic areas because of the 16:08:31
20 objections? 16:08:34

21 A. No. But the objections 16:08:38
22 would have shielded me from answering or 16:08:41

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1	testifying regarding certain of the	16:08:43
2	topics.	16:08:46
3	Q. Is there anything on topic	16:08:46
4	one that you did not -- let me ask it	16:08:50
5	this way.	16:09:01
6	Have we exhausted the	16:09:01
7	information that you have relating to	16:09:09
8	documents shared in communication between	16:09:13
9	anyone on behalf of your law firm in	16:09:16
10	connection with your representation of	16:09:18
11	Mr. Depp and any member of the press	16:09:20
12	during the period of May 21, 2016 and	16:09:24
13	February 1, 2017?	16:09:27
14	MS. RICE: Question is	16:09:29
15	unintelligible. It's not her	16:09:31
16	obligation to exhaust her memory.	16:09:33
17	It's your obligation to ask her	16:09:34
18	questions.	16:09:35
19	Q. Let me ask that a little	16:09:37
20	differently.	
21	Did you have any	16:09:39
22	communications with the press in	16:09:40

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1	connection with your representation of	16:09:48
2	Mr. Depp?	16:09:49
3	MS. RICE: Counsel, that was	16:09:51
4	not an invitation for you to reask	16:09:52
5	questions you've already asked her	16:09:56
6	and to which she has fully	
7	responded. You already asked that	16:09:59
8	question. She already answered	16:09:59
9	that question.	16:10:00
10	MS. BREDEHOFT: I'm going to	16:10:02
11	go through each one of them.	
12	Given your objection to my being	16:10:04
13	able to just try to go through and	16:10:06
14	say have we exhausted --	16:10:07
15	MS. RICE: Counsel, your	16:10:08
16	harassing the witness.	16:10:09
17	MS. BREDEHOFT: I'm not	16:10:11
18	harassing the witness. You're	16:10:12
19	providing harassment objections	16:10:13
20	that are interfering with this and	16:10:15
21	significantly slowing down the	16:10:17
22	deposition. I just never seen	16:10:18

1	anything like this. I don't know	16:10:20
2	what California does. I don't	16:10:21
3	know how you guys can function.	16:10:23
4	But I'm just trying to get through	16:10:24
5	this deposition with questions.	16:10:27
6	So giving your objection --	16:10:29
7	MS. RICE: Counsel, making	16:10:30
8	-- you're the only person that's	16:10:32
9	making speeches is you. If	16:10:33
10	anybody has slowed it down, it has	16:10:35
11	been you. I've been making	16:10:37
12	objections that were entirely	16:10:39
13	proper. And by my count, there's	16:10:41
14	been at least nine questions that	16:10:43
15	are actually sought relevant	16:10:45
16	information to the loss that is	16:10:46
17	pending in Virginia. Otherwise,	16:10:49
18	you've wasted our time.	16:10:51
19	Q. Ms. Wasser, did you have any	16:10:52
20	communications with any member of the	16:10:56
21	press in connection with your	16:11:00
22	representation of Mr. Depp, during the	16:11:03

1	period May 21, 2016 and February 1, 2017?	16:11:04
2	MS. RICE: Counsel, if you	16:11:09
3	are going to start asking	16:11:10
4	questions again, I'm going to	16:11:12
5	suspend the deposition. You asked	16:11:13
6	a whole slew of questions about	16:11:15
7	this. Why are you reasking the	16:11:18
8	same questions again?	16:11:20
9	MS. BREDEHOFT: I would have	16:11:24
10	preferred to ask her if we	16:11:25
11	exhausted the recollection as we	16:11:27
12	went through those, which would	16:11:29
13	have been five very simple	16:11:30
14	questions. And if there wasn't	16:11:32
15	something that had been exhausted,	16:11:34
16	she would be able to think of it,	16:11:35
17	and give it to me now and we can	16:11:36
18	finish it very quickly, because	16:11:38
19	this is my last exhibit and I am	16:11:39
20	at the end. But giving your	16:11:41
21	objections and refusal to let her	16:11:42
22	answer that, I now have to go back	16:11:44

1	in and ensure that I have	16:11:46
2	everything, and that's the way	16:11:48
3	we're doing it. You're call.	16:11:49
4	I'll do it --	16:11:52
5	MS. RICE: You don't reask	16:11:53
6	the question. You ask the	16:11:54
7	question, have I exhausted your	16:11:56
8	memory about any conversations you	16:11:58
9	may or may not have had with the	16:12:00
10	press? That's the way you ask the	16:12:02
11	question. If that's what you are	16:12:04
12	seeking, ask the question, and	16:12:07
13	then let's move on.	16:12:08
14	Q. Ms. Wasser, I'm going to ask	16:12:09
15	you to take a look at topic one. During	16:12:17
16	the course of this deposition, have we	16:12:22
17	exhausted your recollection with respect	16:12:26
18	to the first time?	16:12:28
19	A. We have.	16:12:33
20	Q. Ms. Wasser, I'm going to ask	16:12:33
21	you to look at topic number two.	16:12:36
22	A. Can I ask you not to	16:12:38

1	highlight it. I can see it. It's more	16:12:39
2	difficult.	16:12:43
3	Q. I totally agree with you,	
4	but I don't know how to unhighlight so...	16:12:44
5	But I agree with you. I'm not	16:12:47
6	highlighting. Thank you.	16:12:48
7	A. Tell me two, I'll read two.	16:12:50
8	Q. So Ms. Wasser, if you could	16:12:53
9	look at topic number two on deposition	16:12:56
10	Exhibit number 14, and just take a	16:12:58
11	minute, and then I'm going to ask you if	16:13:02
12	during the course of this deposition	16:13:03
13	we've exhausted your knowledge of topic	16:13:06
14	number two?	16:13:09
15	A. We have.	16:13:09
16	Q. Now, I'm going to ask you to	16:13:11
17	take a look at topic number three.	16:13:14
18	During the course of this	16:13:18
19	deposition, have we exhausted your	16:13:19
20	knowledge of topic number three?	16:13:23
21	A. Certainly my recollection.	16:13:26
22	Yes.	16:13:29

1	Q. And what did you mean by	16:13:29
2	that? Are there other caveats here?	16:13:33
3	A. No. It's just your	16:13:36
4	other two questions related to my	16:13:37
5	recollection, and this one related to my	16:13:39
6	knowledge, so I was trying to keep it	16:13:41
7	consistent.	16:13:43
8	Q. Good point. And knowledge	16:13:43
9	is probably better than recollection	16:13:45
10	because it's a corporate designee. Let	16:13:48
11	me just go back up to number one and do	16:13:50
12	it fast.	16:13:52
13	One and two, have we also	16:13:53
14	exhausted your knowledge with respect to	16:13:56
15	topics one and two?	16:13:59
16	A. We have.	16:14:00
17	MS. RICE: Objection to the	16:14:01
18	extent it would ask for privileged	16:14:02
19	communications between the lawyers	16:14:04
20	at the firms. Subject to that,	16:14:06
21	you can answer.	16:14:08
22	A. Subject to that, we have.	16:14:10

1 Q. Let's go to topic number 16:14:11
2 four. Have we exhausted your knowledge 16:14:13
3 during the course of this deposition with 16:14:23
4 respect to topic number four? 16:14:25

5 MS. RICE: Counsel, I hate 16:14:31
6 to say this, but you didn't ask 16:14:32
7 any questions about number four. 16:14:33
8 I'm not inviting you to do so. 16:14:34

9 A. I don't believe we've 16:14:50
10 exhausted my knowledge or recollection on 16:14:51
11 this subject. 16:14:53

12 Q. Good. Then I appreciate 16:14:54
13 that. Let's go there. 16:14:57

14 Who have you or someone on 16:14:58
15 behalf of your firm spoken with relating 16:15:03
16 to any aspect of the relationship between 16:15:12
17 Mr. Depp and Ms. Heard, including, but 16:15:16
18 not limited to any acts of abuse or 16:15:19
19 violence, any claims that the allegations 16:15:23
20 were not true, and any other evidence 16:15:26
21 gathered to attempt to impeach the 16:15:29
22 credibility of Ms. Heard during the 16:15:29

1	period May 21, 2016 and February 1, 2017?	16:15:30
2	MS. RICE: Objection as	16:15:35
3	phrased. It calls for attorney	16:15:35
4	work product, and invades	16:15:38
5	attorney/client privilege,	16:15:39
6	violates Business and Professions	16:15:41
7	Code Section 6068E; and instruct	16:15:42
8	her not to answer.	16:15:44
9	MR. PRESIADO: Same	16:15:47
10	objections.	16:15:47
11	MS. BREDEHOFT: Let's be	16:15:51
12	clear, you're instructing her not	16:15:51
13	to answer to the extent it's	16:15:52
14	attorney/client privilege, right?	16:15:54
15	But she can answer with	16:15:56
16	communications to third parties,	16:15:57
17	correct?	16:15:59
18	MS. RICE: That wasn't your	16:16:01
19	question.	16:16:02
20	MS. BREDEHOFT: I actually	16:16:07
21	think it was.	16:16:08
22	MS. RICE: Let me make it	16:16:11

1 clear. Persons, witnesses or 16:16:12
2 potential witnesses that were 16:16:16
3 contacted and/or interviewed by 16:16:18
4 the law firm in connection with 16:16:20
5 its representation of Mr. Depp in 16:16:23
6 the dissolution of marriage action 16:16:25
7 is attorney work product. You 16:16:26
8 don't get to piggyback on work 16:16:29
9 done by the firm. 16:16:32

10 MS. BREDEHOFT: Actually, 16:16:37
11 it's not privileged if you 16:16:37
12 communicated with a third party. 16:16:40
13 You can't claim the work product 16:16:42
14 and say I'm not going to tell you 16:16:46
15 who I talked with. 16:16:46

16 MS. RICE: But that was not 16:16:47
17 your question. Your question was 16:16:48
18 so broad that it was 16:16:50
19 impermissible.

20 MS. BREDEHOFT: Okay. Let's 16:16:55
21 break it down. 16:16:56

22 Q. So Ms. Wasser, who have you 16:16:58

1	or anyone at your law firm spoken with as	16:17:04
2	a potential or actual witness relating to	16:17:10
3	the relationship between Mr. Depp and	16:17:12
4	Ms. Heard?	16:17:15
5	MR. PRESIADO: Objection to	16:17:18
6	the extent it calls for	16:17:20
7	attorney/client communication.	16:17:22
8	A. We spoke with several third	16:17:24
9	party witnesses. They were deposed.	16:17:27
10	Some submitted declarations at some	16:17:29
11	point. At this time, I cannot remember	16:17:32
12	their names. And obviously we spoke with	16:17:34
13	our client and cannot reveal those	16:17:43
14	conversations.	16:17:45
15	Q. Alright. Do you recall	16:17:46
16	speaking with any third-party witnesses	16:17:54
17	who were not deposed? We'll go there	16:17:57
18	first, deposed.	16:18:06
19	A. Yes.	16:18:07
20	Q. Who?	16:18:09
21	A. I can't remember.	16:18:12
22	Q. Do you recall speaking with	16:18:13

1 any third party potential witnesses or 16:18:17
2 witness who were not deposed or provided 16:18:20
3 a declaration? 16:18:25

4 A. Yes. 16:18:27

5 Q. Who? 16:18:28

6 A. I don't remember. Suffice 16:18:29

7 to say that during the course of the 16:18:34

8 litigation, several individuals called 16:18:35

9 our firm and wanted to give us 16:18:41

10 information about Ms. Heard, her 16:18:43

11 character, things that she had done in 16:18:47

12 the past. While we took some of the 16:18:50

13 calls and determined that they were 16:18:53

14 either not credible or not relevant. 16:18:56

15 Those that we did, we either got 16:19:01

16 declarations from or subpoenaed. But 16:19:03

17 there were many, many people who reached 16:19:05

18 out and to who we spoke with. Going 16:19:08

19 beyond that, I think would be getting 16:19:11

20 into the realm of work product. 16:19:13

21 Q. Are there any individuals 16:19:16

22 whom you can recall specifically, you or 16:19:25

1 your firm speaking to, that you felt were 16:19:28
2 credible or had relevant information that 16:19:34
3 then gave declaration to the depositions 16:19:37
4 -- take out my -- let me ask that again. 16:19:42
5 That was confusing at the end. 16:19:45
6 So if I'm understanding your 16:19:45
7 answer, you had a lot of people reach 16:19:51
8 out, would you agree that happens in high 16:19:54
9 profile cases? 16:19:58
10 A. Not like it did in this 16:19:59
11 one. 16:20:02
12 Q. Are you familiar with the 16:20:02
13 Depp fans and the following -- 16:20:04
14 A. These weren't Depp fans. 16:20:11
15 Q. Can you remember any of 16:20:14
16 them? 16:20:15
17 MS. RICE: You're asking for 16:20:17
18 the names? Vague and ambiguous. 16:20:18
19 MS. BREDEHOFT: Yes. 16:20:21
20 A. These were people that 16:20:23
21 purported to know Ms. Heard. 16:20:28
22 Q. And you found that some of 16:20:30

Transcript of Laura Allison Wasser, Corporate Designee
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1	them were not credible and some of them	16:20:32
2	didn't have relevant information,	16:20:34
3	correct?	16:20:35
4	A. Yes.	16:20:36
5	Q. And those you thought were	16:20:37
6	credible and had relevant information,	16:20:40
7	you either deposed or obtained	16:20:42
8	declarations on them, correct?	16:20:45
9	A. Correct.	16:20:46
10	Q. Just so that I make sure	16:20:47
11	that I tied this up, can you recall any	16:20:50
12	of the individuals that contacted the	16:20:55
13	firm that you determined were credible	16:20:59
14	and had relevant information who gave	16:21:02
15	declarations for you to depose?	16:21:05
16	MR. PRESIADO: Objection.	16:21:09
17	Relevance and may call for a legal	16:21:10
18	conclusion.	16:21:11
19	A. You're asking me who we	16:21:16
20	deposed in the case?	16:21:18
21	Q. Or gave declarations, if you	16:21:19
22	can recall any of the names?	16:21:21

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1	A. I'm sorry, I do not remember	16:21:23
2	their names. I believe there was a	16:21:25
3	neighbor from the building. There was a	16:21:27
4	makeup artist. I think we deposed	16:21:29
5	Ms. Heard's sister.	16:21:33
6	Q. Anyone else?	16:21:40
7	A. There were others. I	16:21:42
8	just cannot remember them as I sit here	16:21:43
9	today.	16:21:45
10	Q. Did Ms. Heard's sister reach	16:21:46
11	out to your law firm?	16:21:48
12	A. No. She wasn't one of the	16:21:50
13	ones that I was referring to that reached	16:21:52
14	out to the law firm. There was a	16:21:53
15	girlfriend. There was a drug dealer.	16:22:05
16	There were some other friends of hers	16:22:07
17	that felt that what she was doing was not	16:22:07
18	right.	16:22:12
19	Q. Do you remember any of their	16:22:14
20	names?	16:22:16
21	A. Our firm was to try to	16:22:16
22	minimize the fees, the media, the	16:22:18

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1 emotional tax that was being taken by, in 16:22:23
2 my opinion, both parties, but certainly 16:22:27
3 ours. 16:22:31

4 Q. Do you recall the 16:22:31
5 names of any of the drug dealers or 16:22:31
6 friends? 16:22:35

7 A. No. 16:22:37

8 Q. Now, when I asked you about 16:22:37
9 topic number four, to avoid going through 16:22:44
10 all of the topics, I stopped after the 16:22:46
11 first part of it, the relationship 16:22:48
12 between. 16:22:55

13 I'm going to ask you to take 16:22:57
14 a look at all of topic number four in the 16:22:59
15 interest of trying to move this along, 16:23:01
16 and ask you if you went further beyond 16:23:05
17 the relationship between Mr. Depp and 16:23:07
18 Ms. Heard into what's next, which is 16:23:09
19 including, but not limited to any acts of 16:23:13
20 abuse or violence, any claim that the 16:23:15
21 allegations were not true or any other 16:23:16
22 evidence gathered to attempt to increase 16:23:19

1	the credibility of Ms. Heard during the	16:23:21
2	period May 21, 2016 and February 1, 2017,	16:23:23
3	would your answer change from what you	16:23:28
4	gave when I was just asking you about any	16:23:30
5	aspect of the relationship?	16:23:33
6	A. No.	16:23:34
7	Q. So, in other words, all of	16:23:39
8	the topic area of number four, you had	16:23:42
9	people who reached out to you, you	16:23:45
10	determined who was credible and had	16:23:47
11	relevant information, you deposed or	16:23:50
12	obtained declarations, and you can't	16:23:51
13	recall any of the specific individuals at	16:23:54
14	this time; would that be fair?	16:23:56
15	A. Yes.	16:23:58
16	Q. And have we exhausted your	16:23:59
17	knowledge on topic number four with what	16:24:03
18	has been said?	16:24:06
19	A. There were also employees of	16:24:07
20	Mr. Depp and Ms. Heard to whom we spoke.	16:24:10
21	We may have deposed them, may have	16:24:13
22	interviewed them. But that would be	16:24:17

1 another category that may not have 16:24:19
2 reached out to us, but that we also had 16:24:21
3 communications with. 16:24:23

4 Q. Alright. Do you recall any 16:24:24
5 of those names? 16:24:26

6 A. I don't. I know there was a 16:24:28
7 personal assistant. There was a house 16:24:34
8 manager in the Bahamas, maybe that was a 16:24:37
9 couple. There was -- there were 16:24:39
10 individuals that had been on an 16:24:43
11 airplane with them, you know, flight 16:24:44
12 crew. There were maybe drivers or 16:24:47
13 security people. 16:24:55

14 Q. Do you recall the names of 16:24:56
15 any of those? 16:25:00

16 A. I do not. 16:25:01

17 Q. I'm going to -- have we now 16:25:03
18 exhausted topic number four, you've 16:25:08
19 exhausted your knowledge of topic number 16:25:10
20 four? 16:25:12

21 A. Yes. 16:25:12

22 Q. I'm going to ask you to take 16:25:14

1 a look at number five. Topic number 16:25:16
2 five. It's kind of a catchall if you 16:25:18
3 will. 16:25:29

4 A. I thought the other ones 16:25:30
5 were catchalls. This is the catchall of 16:25:33
6 catchalls. 16:25:34

7 So the answer is yes, we 16:25:36
8 exhausted my knowledge and recollection. 16:25:36

9 Q. Okay. Is there anything 16:25:37
10 else that you can recall -- 16:25:42

11 MS. BREDEHOFT: You can take 16:25:44
12 that down now, Alan. Thank you 16:25:44
13 very much. 16:25:46

14 Q. Is there anything else that 16:25:47
15 you can recall, based on my questions 16:25:48
16 during the deposition today, that you 16:25:53
17 didn't recall when I asked it, but now 16:25:55
18 you would either like to change it or 16:25:58
19 you've been refreshed and have an answer; 16:26:01

20 anything of that nature? 16:26:02

21 A. Nope. 16:26:04

22 Q. Is there anything else that 16:26:05

1 you believe is relevant to the areas of 16:26:06
2 questions I've asked that you haven't 16:26:10
3 told me -- or that you haven't told me 16:26:14
4 because I didn't ask the question the way 16:26:27
5 that would have generated the answer 16:26:30
6 that's relevant to what we have been 16:26:32
7 asking, we've been talking about? 16:26:35
8 MS. RICE: Compound. 16:26:37
9 MR. PRESIADO: Calls for 16:26:39
10 speculation. 16:26:40
11 MS. RICE: Calls for 16:26:41
12 speculation. 16:26:41
13 A. If you could do that in 16:26:43
14 Virginia, I want to go practice in 16:26:43
15 Virginia. You can just ask a witness if 16:26:46
16 there's anything that you forgot to ask 16:26:48
17 or didn't ask it the right way? 16:26:49
18 Q. That you think is relevant. 16:26:50
19 That you think is important? 16:26:52
20 A. No. 16:26:55
21 MR. PRESIADO: Calls for a 16:26:56
22 legal conclusion. 16:26:57

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1	MS. BREDEHOFT: I have no	16:26:59
2	further questions. Thank you very	16:27:00
3	much.	16:27:01
4	MR. PRESIADO: I have no	16:27:04
5	questions.	16:27:05
6	MS. BREDEHOFT: In Virginia,	16:27:09
7	we have to ask the witness if they	16:27:09
8	want to read or waive signature.	16:27:11
9	Ms. Rice, I think that's probably	16:27:16
10	up to you. If Ms. Wasser wants	16:27:18
11	the deposition transcript as typed	16:27:21
12	up, has the option -- the	16:27:25
13	opportunity to read it, and then	16:27:25
14	make any corrections like	16:27:27
15	typographical or if the word no is	16:27:30
16	missing or negative and a	16:27:33
17	positive, something like that, and	16:27:34
18	then sign it or she could waive	16:27:36
19	signature and trust that the	16:27:39
20	court reporter has done the best	16:27:41
21	job, clean. Which would you	16:27:43
22	prefer?	16:27:45

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1	MS. RICE: The first.	16:27:46
2	THE WITNESS: Obviously, I	16:27:56
3	have to do what my counsel asks,	16:27:57
4	so I'll read it when it's ready.	16:27:58
5	THE VIDEOGRAPHER: Does this	16:28:02
6	conclude all the questioning from	16:28:03
7	all parties?	16:28:04
8	MS. BREDEHOFT: It does.	
9	THE VIDEOGRAPHER: Very	16:28:07
10	good. We're going off	16:28:07
11	record. This concludes the	16:28:08
12	deposition of Laura Wasser. Time	16:28:09
13	is 1628.	16:28:11
14	(Court reporter asked for	
15	the order.)	
16	MS. BREDEHOFT: Whatever our	16:28:25
17	standard order is.	16:28:25
18	MR. PRESIADO: Yes.	
19	THE COURT REPORTER:	16:28:36
20	Electronic?	16:28:36
21	MS. VASQUEZ: Yes.	16:28:39
22	MS. RICE: We're not	16:28:43

1 ordering it, but how do we get the 16:28:44
2 transcript?

3 MS. VASQUEZ: As soon as we 16:28:55
4 receive it, I will forward it onto . 16:28:55
5 Amy and Laura. 16:28:57

6 THE VIDEOGRAPHER: Aside 16:29:01
7 from Ms. Bredehoft with any 16:29:03
8 standing orders, does anybody else 16:29:05
9 like to order a video at this 16:29:06
10 time? 16:29:07

11 MS. RICE: No, thank you. 16:29:10

12 MS. VASQUEZ: Mr. Depp will 16:29:11
13 order a video. 16:29:13

14 (Time noted: 4:29 p.m.)

15
16 -----
17 LAURA ALLISON WASSER

18 Subscribed and sworn to
19 before me this day
of , 2021

20

21

22 Notary Public

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I N D E X

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C E R T I F I C A T E

I, CHRISTINE CUTRONE, Shorthand
Reporter and a Notary Public, do hereby
state:

That the witness whose examination is
herein before set forth has duly
acknowledged that such an examination is a
true record of the testimony given by such
a witness.

I further state that I am not
related to any of these parties to this
action by blood or marriage, and that I am
not in any way interested in the outcome
of this matter.

IN WITNESS WHEREOF, I have hereunto
set my hand this 5th day of January, 2021.


CHRISTINE CUTRONE