

Transcript of Detective Marie Sadanaga, Designated Representative  
Conducted on March 12, 2021

153

1	I'll let Elaine ask whatever follow-up questions	07:10:39
2	she wants to ask at this point, but hopefully we	07:10:42
3	can get you out of here soon.	07:10:44
4	THE WITNESS: Thank you.	07:10:47
5	MS. BREDEHOFT: I'll try to make it	07:10:48
6	very quick.	07:10:49
7	FURTHER EXAMINATION BY COUNSEL FOR DEFENDANT	07:10:51
8	BY MS. BREDEHOFT:	07:10:51
9	Q You testified about being a patrol	07:10:53
10	officer.	07:10:56
11	Do you recall what years you were a	07:10:57
12	patrol officer?	07:10:58
13	A It was October 2003 until January 2009.	07:11:02
14	Q You were asked some questions by -- by	07:11:17
15	counsel for Mr. Depp about potential motivations	07:11:20
16	for officers to follow policies or protocols or	07:11:24
17	not follow them.	07:11:29
18	MS. BREDEHOFT: Alex, I'm going to ask	07:11:30
19	you to bring up Plaintiff's Exhibit -- or	07:11:31
20	Deposition Exhibit Number 49, please.	07:11:34
21	AV TECHNICIAN: (Technician complies.)	07:11:43
22	BY MS. BREDEHOFT:	07:11:56

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154

1 Q Detective, I'm going to show you what 07:11:56  
2 has been marked as Deposition Exhibit Number 49, 07:11:58  
3 and it's a -- it was provided to us by the LAPD in 07:12:01  
4 discovery in this case, and it's -- the first page 07:12:06  
5 of it is an Internal Affairs Group Complaint 07:12:10  
6 Investigations. 07:12:13  
7 Do you see that? 07:12:17  
8 A Yes. 07:12:18  
9 Q It's dated May 2015. 07:12:18  
10 Do you see that? 07:12:23  
11 A Yes. 07:12:24  
12 Q Okay. I'm going to go to the second 07:12:25  
13 page, and they have misconduct defined. 07:12:27  
14 What, if any, understanding do you have 07:12:35  
15 that if a patrol officer violates department 07:12:38  
16 policies, rules, or procedures, whether that would 07:12:42  
17 con- -- would constitute misconduct under the LAPD 07:12:45  
18 policies and procedures? 07:12:51  
19 MR. MONIZ: Objection. Improper, 07:12:53  
20 incomplete hypothetical. Lacks foundation. Calls 07:12:54  
21 for speculation. Vague and ambiguous. 07:12:57  
22 The document and the policies speak for 07:13:00

1 themselves, and it goes beyond the scope of the 07:13:03  
2 topics on which this witness was designated to 07:13:06  
3 testify. 07:13:11  
4 THE WITNESS: Violation of department 07:13:12  
5 policies, rules, or procedures is misconduct. 07:13:14  
6 BY MS. BREDEHOFT: 07:13:18  
7 Q And what, if any, understanding do you 07:13:18  
8 have of whether neglect of duty would constitute 07:13:21  
9 misconduct under the policies, procedures, and 07:13:24  
10 rules as of May 2016 for misconduct? 07:13:27  
11 MR. MONIZ: Objection. 07:13:32  
12 MS. BREDEHOFT: You know, I asked that 07:13:34  
13 really badly, and it got all jumbled. Let me try 07:13:35  
14 that one again. 07:13:37  
15 BY MS. BREDEHOFT: 07:13:38  
16 Q What, if any, understanding do you have 07:13:39  
17 of whether neglect of duty constitutes misconduct 07:13:40  
18 under the LAPD policies and procedures in effect 07:13:46  
19 in May of 2016? 07:13:49  
20 MR. MONIZ: Objection. Beyond the 07:13:52  
21 scope of the topics for which this witness was 07:13:53  
22 designated to testify. Calls for speculation. 07:13:57

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156

1 Lacks foundation. Improper, incomplete 07:13:59  
2 hypothetical. Vague and ambiguous as to the 07:14:03  
3 phrase "neglect of duty," which is an inherently 07:14:06  
4 nebulous phrase. Calls for an opinion, and the 07:14:11  
5 document speaks for itself. 07:14:14  
6 THE WITNESS: It's misconduct. 07:14:21  
7 BY MS. BREDEHOFT: 07:14:21  
8 Q Okay. And what, if any, understanding 07:14:23  
9 do you have of whether conduct that tended to 07:14:25  
10 reflect unfavorably upon the employee or the 07:14:27  
11 department constituted misconduct in May of 2016? 07:14:30  
12 (The Reporter clarified the record.) 07:14:42  
13 BY MS. BREDEHOFT: 07:14:44  
14 Q What, if any, understanding do you have 07:14:44  
15 of whether conduct which may tend to reflect 07:14:46  
16 unfavorably upon the employee or the department 07:14:49  
17 constitutes misconduct under the policies and 07:14:53  
18 procedures of the LAPD as of May 2016? 07:14:56  
19 MR. MONIZ: And objection. The 07:15:01  
20 document and the policies speak for themselves and 07:15:02  
21 are the own best evidence of what the actual 07:15:05  
22 policies are. 07:15:08

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157

1 Lacks foundation. Calls for 07:15:09  
2 speculation. Vague and ambiguous, and including 07:15:11  
3 as to the phrase "conduct which may tend to 07:15:15  
4 reflect unfavorably," relevance. And calls for an 07:15:19  
5 opinion. 07:15:28  
6 THE WITNESS: It is also misconduct. 07:15:31  
7 MS. BREDEHOFT: Thank you. 07:15:33  
8 Alex, you can take this away. 07:15:35  
9 AV TECHNICIAN: (Technician complies.) 07:15:37  
10 BY MS. BREDEHOFT: 07:15:38  
11 Q There were a number of questions asked 07:15:39  
12 about if observe injury, if observe property 07:15:42  
13 damage, back and forth, and both of us have asked 07:15:47  
14 you a lot of questions about this, and so I just 07:15:50  
15 want to make sure that it's very clear. 07:15:53  
16 If a police officer responding to 07:15:56  
17 domestic violence call sees injury, regardless of 07:16:01  
18 whether the victim cooperates, what is the police 07:16:06  
19 officer's obligation? This is as of May 2016. 07:16:10  
20 MR. MONIZ: Objection. Incomplete 07:16:15  
21 hypothetical. Lacks foundation. Calls for 07:16:16  
22 speculation. 07:16:18