

Stephen Deuters  
Proffer Exhibit A  
Depp v. Heard  
CL-2019-0002911

**FILED**  
MAY 23 2022  
JOHN T. FREY  
Clerk of the Circuit Court  
of Fairfax County, VA



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# Transcript of Stephen Deuters

**Date:** February 24, 2022  
**Case:** Depp, II -v- Heard

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WORLDWIDE COURT REPORTING & LITIGATION TECHNOLOGY

20385

Transcript of Stephen Deuters  
Conducted on February 24, 2022

<p>1 VIRGINIA: 2 IN THE CIRCUIT COURT FOR FAIRFAX COUNTY 3 4 ----- x 5 JOHN C. DEPP, II : 6 Plaintiff, : 7 v. : Civil Action No. 8 AMBER LAURA HEARD, : Cl-2019-0002911 9 Defendant. : 10 ----- x 11 12 13 Videotaped Videoconference Deposition of 14 STEPHEN DEUTERS 15 Conducted Virtually 16 Thursday, February 24, 2022 17 12:30 p.m. 18 19 20 Job No.: 433440 21 Pages: 1 - 237 22 Reported By: Scott D. Gregg, RPR</p>	<p>1 APPEARANCES 2 ON BEHALF OF PLAINTIFF AND STEPHEN DEUTERS: 3 (Appearing via videoconference) 4 CAMILLE VASQUEZ, ESQUIRE 5 BENJAMIN G. CHEW, ESQUIRE 6 YARELYN MENA, ESQUIRE 7 BROWN RUDNICK LLP 8 2211 Michelson Drive, 7th Floor 9 Irvine, California 92612 10 (949) 440-0240 11 cvasquez@brownrudnick.com 12 bchew@brownrudnick.com 13 ymena@brownrudnick.com 14 //// 15 //// 16 //// 17 //// 18 //// 19 //// 20 //// 21 //// 22 ////</p>
<p>1 Deposition of STEPHEN DEUTERS, held at the 2 offices of: 3 4 5 All Parties Participated Via 6 Videoconference 7 8 9 10 11 Pursuant to notice, before Scott D. Gregg, RPR, 12 Notary Public in and for the City of Norfolk. 13 14 15 16 17 18 19 20 21 22</p>	<p>1 APPEARANCES CONTINUED 2 ON BEHALF OF DEFENDANT: 3 (Appearing via videoconference) 4 J. BENJAMIN ROTTENBORN, ESQUIRE 5 KAREN M. STEMLAND, ESQUIRE 6 WOODS ROGERS PLC 7 123 East Main Street, 5th Floor 8 Charlottesville, Virginia 22902 9 (434) 220-6826 10 brottenborn@woodsrogers.com 11 kstemland@woodsrogers.com 12 13 ALSO PRESENT: 14 Drew Halton, Videographer 15 Catherine Gonzalez, Technician Specialist 16 17 18 19 20 21 22</p>

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 Conducted on February 24, 2022

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21	PROCEEDINGS	
22	THE VIDEOGRAPHER: Here begins disk number	
1		one in the video deposition of Stephen Deuters, in
2		the matter of John C. Depp, II vs. Amber Laura
3		Heard, in the Fairfax County Circuit Court of
4		Virginia, Case No. CL-2019-0002911.
5		Today's date is February 24th, 2022. Time
6		on the video monitor is 12:31 p.m. Eastern.
7		The videographer is Drew Halton,
8		representing Planet Depos.
9		All participants are attending remotely.
10		Would counsel, please, voice identify
11		themselves and state whom they represent.
12		MR. ROTTENBORN: This is Ben Rottenborn,
13		here today with my colleague Karen Stemland, on
14		behalf of Amber Heard.
15		MS. VASQUEZ: Good morning. Camille
16		Vasquez, of Brown Rudnick, with my colleagues
17		Benjamin Chew and Yarelyn Mena, representing both
18		Mr. Depp and the deponent, Stephen Deuters.
19		THE VIDEOGRAPHER: The court reporter is
20		Scott Gregg, representing Planet Depos.
21		Would the reporter, please, swear in the
22		witness.
1		THE COURT REPORTER: Will counsel, please,
2		stipulate that in lieu of formally swearing in the
3		witness, the reporter will instead ask the witness
4		to acknowledge that their testimony will be true
5		under the penalties of perjury, that counsel will
6		not object to the admissibility of the transcript
7		based on proceeding in this way, and that the
8		witness has verified that he is, in fact, Stephen
9		Deuters?
10		MR. ROTTENBORN: Stipulated.
11		MS. VASQUEZ: So stipulated.
12		THE COURT REPORTER: And Mr. Deuters?
13		THE WITNESS: Yes.
14		THE COURT REPORTER: Do you confirm?
15		THE WITNESS: Yes.
16		STEPHEN DEUTERS, called as a witness,
17		having been first duly sworn, was examined and
18		testified as follows:
19		EXAMINATION
20		BY MR. ROTTENBORN:
21		Q Good afternoon, Mr. Deuters.
22		<b>A Good afternoon.</b>



<p>9</p> <p>1 Q Again, my name is Ben Rottenborn. I'm 2 here on behalf of Amber Heard, and we appreciate 3 your attendance today. 4 Are there -- have you ever been deposed 5 before? 6 <b>A I have not, no.</b> 7 Q Are you in agreement that your testimony 8 today is on the record and under oath? 9 <b>A I understand, yes.</b> 10 Q And you are physically located in England 11 at the moment? 12 <b>A Correct.</b> 13 Q Is that where you live? 14 <b>A Yes.</b> 15 Q Where do you -- I don't want your street 16 address or anything, but what city in England do 17 you live in? 18 <b>A London.</b> 19 Q Is there any condition that you're under 20 that would keep you from testifying fully and 21 truthfully today? 22 <b>A No.</b></p>	<p>11</p> <p>1 statement, that's the witness statement from the 2 UK trial? 3 <b>A Correct.</b> 4 Q And today, if we, you or I, or Ms. Vasquez 5 uses the term "UK trial" or "UK litigation" or 6 something similar, are we all -- do you agree that 7 we're referring to the case that Mr. Depp brought 8 against The Sun in the UK in which you testified? 9 <b>A Yes, correct.</b> 10 Q And you testified on behalf of Mr. Depp in 11 that case, correct? 12 MS. VASQUEZ: Objection; calls for a legal 13 conclusion. 14 BY MR. ROTTENBORN: 15 Q You can answer today unless your counsel 16 instructs you not to answer. 17 <b>A I'm sorry. Can you, please, repeat the 18 question back?</b> 19 Q Sure. You testified on behalf of Mr. Depp 20 in the UK litigation, right? 21 <b>A Yes.</b> 22 Q And Mr. -- Ms. Vasquez is your counsel for</p>
<p>10</p> <p>1 Q Now, I notice -- I don't want to be 2 presumptuous, but was that -- is that wine that 3 you're drinking next to you? 4 <b>A It's Coca-Cola Zero.</b> 5 Q Okay. All right. I saw it in a wine 6 glass; I just wanted to make sure. 7 So you're not taking any medications or 8 under the influence of anything that would prevent 9 your full testimony today, correct? 10 <b>A Correct.</b> 11 Q What did you do to prepare for today's 12 deposition? And when I ask you that, I'm sure 13 Camille will give you an instruction, but I want 14 to be clear as well, I'm not asking for anything 15 specifically that you discussed with any of your 16 attorneys, just to be clear. And I'm not asking 17 for that at any point today. 18 So with that disclaimer, what did you do 19 to prepare for your deposition? 20 <b>A Sure. I read my witness statement and I 21 read my transcript from the UK trial.</b> 22 Q And when you refer to your witness</p>	<p>12</p> <p>1 the purposes of today's deposition as well? 2 <b>A Yes.</b> 3 MR. ROTTENBORN: All right. Move to ask 4 leading questions to the witness. 5 BY MR. ROTTENBORN: 6 Q What else did you review other than your 7 witness statement and your UK testimony? 8 <b>A I didn't review anything else. I had a 9 brief conversation with Camille yesterday, and 10 that's about it.</b> 11 Q Okay. Have you spoken with anyone else 12 about the substance of your deposition in this 13 case other than your attorneys? 14 <b>A No.</b> 15 Q Have you spoken with Adam Waldman about 16 it? 17 <b>A No.</b> 18 Q When was the last time you spoke with 19 Mr. Waldman? 20 <b>A I'd have to say it was a while ago. I 21 generally don't know. It wasn't this year. 22 Sometime last year, I suspect. Sometime the</b></p>

<p>13</p> <p>1 <b>second half of last year perhaps, but I genuinely</b> 2 <b>can't recall the last specific time.</b> 3 Q And he's not your attorney for the 4 purposes of your involvement in this case, 5 correct? 6 <b>A Correct, he is not.</b> 7 Q Have you talked with Mr. Depp about your 8 deposition? 9 <b>A Other than the fact that I was – it was</b> 10 <b>occurring, that was it, that was the only way in</b> 11 <b>which it was broached.</b> 12 Q When did you speak with Mr. Depp about 13 this deposition occurring? 14 <b>A Probably about 14 hours ago when I saw him</b> 15 <b>last.</b> 16 Q You saw him in person? 17 <b>A Yes.</b> 18 Q Okay. Was that in the United Kingdom? 19 <b>A Yes.</b> 20 Q How often do you speak with Mr. Depp now? 21 Would you say on a daily basis? 22 <b>A With regard to my work, near enough. It</b></p>	<p>15</p> <p>1 Q And you're the president of that entity, 2 correct? 3 <b>A Essentially Johnny's president. I'm sort</b> 4 <b>of like the day-to-day CEO, if you will.</b> 5 Q Can you just walk me through your 6 employment history with Mr. Depp. And I'm sure 7 I'll have more specific questions, but just kind 8 of when you started working for him, what 9 positions you held, you know, from the start until 10 now? 11 <b>A Yeah, sure. I think I – well, yeah, mid</b> 12 <b>June, I think, 2004 I started working with</b> 13 <b>Mr. Depp. And it's been a pretty consistent run</b> 14 <b>since then. My first work with him was appearing</b> 15 <b>in an assistant capacity which lasted for some</b> 16 <b>time. And then as jobs naturally do, they expand</b> 17 <b>and one gets promoted and such and such, and now</b> 18 <b>I'm, yeah, heading up the UK branch of his</b> 19 <b>company.</b> 20 Q What -- other than being his personal 21 assistant and heading up the UK branch of his 22 production company, what other positions have you</p>
<p>14</p> <p>1 <b>depends. It's not – it's not – you know, it's</b> 2 <b>not the same, it's not consistent. We'll go</b> 3 <b>through periods, but other periods I might not</b> 4 <b>hear or speak to him for a couple of weeks, even a</b> 5 <b>month.</b> 6 Q So you're employed by Mr. Depp or one of 7 his companies currently, right? 8 <b>A Yes.</b> 9 Q What is your current position? 10 <b>A I currently head up – basically it's sort</b> 11 <b>of a sister company, if you will, of his American</b> 12 <b>company based here in the UK.</b> 13 Q Is that – what's the name of that sister 14 company? 15 <b>A I'm sorry? It went a bit fuzzy there.</b> 16 Q Sure. Yeah, please let me know if I cut 17 out or anything. 18 What is the name of the sister company? 19 <b>A All right. IN.2 Film.</b> 20 Q Is that – is that the European affiliate 21 of his production company, Infinitum Nihil? 22 <b>A Correct, UK, slash, European, correct.</b></p>	<p>16</p> <p>1 held for Mr. Depp or one of his companies, if any? 2 <b>A Yeah, I don't think there's really any</b> 3 <b>others I can sort of say, you know, concretely. I</b> 4 <b>think they are really the two really, I suppose.</b> 5 Q How old are you now? 6 <b>A Forty-three.</b> 7 Q So you were approximately 25 when you 8 first started working for Mr. Depp? 9 <b>A That's correct.</b> 10 Q How did you come to first be employed by 11 Mr. Depp? 12 <b>A I was – I was in the business, so to</b> 13 <b>speak, and I was working with a producer, and a</b> 14 <b>window of opportunity arose –</b> 15 Q Sorry. 16 <b>A A window of opportunity arose to work with</b> 17 <b>Mr. Depp; he needed a local assistant. I think</b> 18 <b>his previous assistant just finished working with</b> 19 <b>him, so he was – there was a window of</b> 20 <b>opportunity there that I was offered, and the rest</b> 21 <b>is history, I guess.</b> 22 Q Sorry. I accidentally knocked my speaker</p>



<p>17</p> <p>1 over, so I just had to pick that up. 2 <b>A No worries.</b> 3 Q Now, so you've been with -- working for 4 Mr. Depp approximately 18 years; is that right? 5 <b>A Yeah, that seems right, yep.</b> 6 Q And has he been the sole -- or your 7 employment with Mr. Depp been the sole source of 8 income salary-wise for you over those years? 9 <b>A Yes.</b> 10 Q It's been the only job that you've had for 11 the last 18 or so years, correct? 12 <b>A Yes, correct.</b> 13 Q At some point you resided in California, 14 correct? 15 <b>A Yes. Well, I wouldn't say resided. I</b> 16 <b>had, you know, Visas, work Visas to work there,</b> 17 <b>but I wasn't living there. I worked there for a</b> 18 <b>18 period of time.</b> 19 Q How long did you live in California or 20 work in California? 21 <b>A I'd have to sort of go back through it a</b> 22 <b>little bit. I probably would be off the top of my</b></p>	<p>19</p> <p>1 years, it, you know, naturally ventures into that 2 category. 3 BY MR. ROTTENBORN: 4 Q And you're regarded almost as family to 5 Mr. Depp, right? 6 MS. VASQUEZ: Objection; vague and 7 ambiguous, assumes facts. 8 THE WITNESS: I don't think I could assume 9 that. I think he would have to say that. We're 10 friends. 11 BY MR. ROTTENBORN: 12 Q You're friends. Do you recall giving 13 testimony in the United Kingdom in the case -- 14 that you UK litigation, yes? 15 <b>A Certainly, yeah.</b> 16 Q And in that testimony that you gave, you 17 were under oath to tell the truth, correct? 18 <b>A Absolutely, yes.</b> 19 Q And you were asked questions by The Sun's 20 attorney under cross-examination, correct? 21 <b>A Sorry, Ben. You went fuzzy just the top</b> 22 <b>of that question.</b></p>
<p>18</p> <p>1 head, anywhere between -- I mean, no less than 2 18 months, maybe every two years if you were to -- 3 not in one go, you understand, like, you know, 4 various different productions; and if you were to 5 compile them all, I would say, yeah, somewhere 6 between 18 months to two years probably is 7 realistic. 8 Q During the time that Ms. Heard and 9 Mr. Depp were involved in a relationship, were you 10 primarily based in California? 11 <b>A During that period, I was -- yeah, I mean</b> 12 <b>I would say it was probably half and half. I</b> 13 <b>wouldn't say primarily. Half and half is probably</b> 14 <b>a fair assumption.</b> 15 Q Half in California and half in England? 16 <b>A Correct, yeah.</b> 17 Q Now, you're more than an employee to 18 Mr. Depp; you're also a friend, right? 19 MS. VASQUEZ: Objection; assumes facts, 20 vague. 21 THE WITNESS: I would say, you know, when 22 you spend a lot of time with a person over the</p>	<p>20</p> <p>1 Q You were asked questions under 2 cross-examination by The Sun's attorney in that 3 case, correct? 4 <b>A Yes, correct.</b> 5 MR. ROTTENBORN: Catherine -- I'm sorry -- 6 Catherine, are you the one pulling up the 7 exhibits? 8 THE TECHNICIAN SPECIALIST: Yes, Counsel. 9 MR. ROTTENBORN: Could you pull up the 10 document entitled UK trial, day five, Deuters 11 testimony. 12 THE TECHNICIAN SPECIALIST: Yes, sir. 13 Please standby. 14 MR. ROTTENBORN: Thank you. 15 THE TECHNICIAN SPECIALIST: Exhibit 1. 16 MR. ROTTENBORN: Thank you. And can you 17 go to page 737, please. 18 And I'll mark this and move it in as 19 Exhibit 1. 20 (Exhibit No. 1 was marked for 21 identification.) 22 BY MR. ROTTENBORN:</p>

21  
1 Q Mr. Deuters, do you see that this is a  
2 transcript of the testimony that you gave and the  
3 questions that you were asked in the UK  
4 litigation?  
5 A Yes.  
6 Q And do you see on page 737, line 15,  
7 you're asked a question: Do you agree that you  
8 were more than an employee, you were a friend?  
9 Answer: Yes, I suppose so.  
10 Question: And regarded almost as family?  
11 Answer: Yes.  
12 Did I read that right?  
13 A Yes.  
14 Q Now, you're --  
15 MR. ROTTENBORN: You can take that off,  
16 please.  
17 BY MR. ROTTENBORN:  
18 Q You'd consider yourself loyal to Mr. Depp,  
19 correct?  
20 MS. VASQUEZ: Objection; vague.  
21 THE WITNESS: You know, as a friend would  
22 to a friend, yes, absolutely.

22  
1 BY MR. ROTTENBORN:  
2 Q And your loyalty to him has been rewarded  
3 because you're now the European president of his  
4 production company, yes?  
5 MS. VASQUEZ: Objection; assumes facts --  
6 I'm sorry, Mr. Deuters. At certain points I may  
7 be objecting, so if you could just give me a  
8 couple seconds to state my objections, I'm sure  
9 the court reporter, Scott, would very much  
10 appreciate that.  
11 THE WITNESS: Sorry.  
12 MS. VASQUEZ: It's okay.  
13 Objection; vague, ambiguous, assumes  
14 facts, lack of foundation.  
15 BY MR. ROTTENBORN:  
16 Q Let me ask it again, Mr. Deuters.  
17 My question was, your loyalty to Mr. Depp  
18 has been rewarded because you're now the European  
19 president of his production company, correct?  
20 MS. VASQUEZ: Also calls for speculation.  
21 THE WITNESS: I would say, you know, not  
22 quite in that way really because the truth of it

23  
1 is, it's been sort of a plan to put together a UK  
2 company since actually 2007. So we've really been  
3 discussing it since then, so that's -- yeah,  
4 that's the truth of the matter, and I was always  
5 sort of going to lead it from there.  
6 MR. ROTTENBORN: Catherine, can you,  
7 please, pull up the same exhibit.  
8 BY MR. ROTTENBORN:  
9 Q And, Mr. Deuters, on page 737 there, isn't  
10 it true that under oath in the UK you were asked  
11 the question at line 20, on page 737, and your  
12 loyalty to him has been rewarded because you are  
13 now the European president of his production  
14 company?  
15 And your answer was, right, yes.  
16 Did I read that correctly?  
17 A Yes.  
18 Q You're financially dependent on Mr. Depp  
19 for your income, correct?  
20 A Yes.  
21 Q And you're dependent on the Johnny Depp  
22 brand for your future income, right?

24  
1 MS. VASQUEZ: Objection; vague, ambiguous.  
2 THE WITNESS: I'm not quite sure what you  
3 mean by that. Could you rephrase the question  
4 perhaps?  
5 BY MR. ROTTENBORN:  
6 Q Just answer as best you can.  
7 You're dependent on the Johnny Depp brand  
8 for your future income, correct?  
9 MS. VASQUEZ: Objection; vague, ambiguous.  
10 THE WITNESS: I'm not really sure how to  
11 answer that.  
12 MS. VASQUEZ: Mr. Deuters, if you don't  
13 understand the question --  
14 THE WITNESS: Yeah.  
15 MR. ROTTENBORN: No coaching the witness,  
16 Camille.  
17 MS. VASQUEZ: Okay. How about ask  
18 questions that are intelligible then.  
19 BY MR. ROTTENBORN:  
20 Q You're dependent on the Johnny Depp brand  
21 for your future income, correct?  
22 MS. VASQUEZ: Same objection. Now we're



25  
1 getting argumentative, asked and answered.  
2 THE WITNESS: I mean, the truth is not  
3 necessarily. I mean, I suppose you could say  
4 that, but not exclusively.  
5 MR. ROTTENBORN: Catherine, can you,  
6 please, scroll down to page 738.  
7 BY MR. ROTTENBORN:  
8 Q And in your testimony in the UK,  
9 Mr. Deuters, on line seven you were asked the  
10 question, you are dependent on the Johnny Depp  
11 brand for your future income?  
12 And on line nine you answered, yes.  
13 Did I read that correctly?  
14 **A Yes.**  
15 Q Now, if Mr. Depp or the brand is -- if  
16 Mr. Depp or his brand is damaged professionally,  
17 then you, in turn, are damaged financially,  
18 correct?  
19 **A Yes.**  
20 Q Losing the trial in the UK was damaging  
21 for Johnny Depp and his brand, correct?  
22 MS. VASQUEZ: Objection, Mr. Deuters

26  
1 [sic]. Calls for speculation, assumes facts, lack  
2 of foundation, argumentative.  
3 THE WITNESS: I mean, yeah. I mean, I  
4 don't -- yeah, I mean, I would have to agree, yes.  
5 BY MR. ROTTENBORN:  
6 Q Let's talk about generally -- well, let me  
7 ask you this: When did you become the European  
8 president of the production company?  
9 **A Without double-checking, I'm actually not**  
10 **sure of the official date.**  
11 Q Was it sometime since 2019, let's say?  
12 **A In a way -- I would actually say it was**  
13 **probably at least summer of 2017 was when it was**  
14 **probably sort of first put into motion, I would**  
15 **say.**  
16 Q And you'd agree that Johnny and Amber  
17 split up in May of 2016, correct?  
18 **A Yes.**  
19 Q So during the time that he was in a  
20 relationship with Amber, your job as it relates to  
21 Johnny was his -- was to -- was as a personal  
22 assistant for Johnny, not as the European

27  
1 president of the production company, correct?  
2 **A Correct, I wasn't the European president,**  
3 **no. Yes, so personal assistant, yes. I was very**  
4 **involved with the company at that time, so it**  
5 **wasn't sort of a sudden giant leap; it was more of**  
6 **just a natural progression.**  
7 Q Okay. And I want to get to your job  
8 duties in a second, but, first, your wife also is  
9 employed by Johnny or one of his companies, right?  
10 MS. VASQUEZ: Objection; assumes facts.  
11 Mr. Deuters, just a reminder, I'm going to  
12 be objecting, so it would be helpful if you'll  
13 just give me a couple seconds to do so.  
14 BY MR. ROTTENBORN:  
15 Q You can answer.  
16 MS. VASQUEZ: I believe he did.  
17 THE WITNESS: She's not employed, no.  
18 BY MR. ROTTENBORN:  
19 Q Does she receive any compensation from  
20 Mr. Depp or any of his companies?  
21 MS. VASQUEZ: Objection; vague.  
22 THE WITNESS: It went fuzzy. I heard does

28  
1 she something receive.  
2 BY MR. ROTTENBORN:  
3 Q Does she receive any pay or compensation  
4 from Mr. Depp or any of his companies?  
5 MS. VASQUEZ: Objection; vague.  
6 THE WITNESS: No.  
7 MR. ROTTENBORN: And, Catherine, you can  
8 take down the exhibit, please.  
9 BY MR. ROTTENBORN:  
10 Q Has she ever?  
11 **A No.**  
12 Q Does she run any of Mr. Depp's social  
13 media pages?  
14 MS. VASQUEZ: Objection; calls for  
15 speculation, assumes facts, vague.  
16 THE WITNESS: She assists with his  
17 Instagram.  
18 BY MR. ROTTENBORN:  
19 Q Does she make posts on Instagram for  
20 Mr. Depp or on his behalf?  
21 MS. VASQUEZ: Objection; vague, ambiguous,  
22 calls for speculation.



<p style="text-align: right;">29</p> <p>1 THE WITNESS: She has made posts, yes, but 2 not exclusively. But, yes, she has made posts. 3 BY MR. ROTTENBORN: 4 Q And does she -- Mr. Depp has given her the 5 authority to make those posts that she makes on 6 his Instagram account? 7 MS. VASQUEZ: Objection; calls for 8 speculation, calls for a legal conclusion, assumes 9 facts, lack of foundation, and hearsay. 10 THE WITNESS: I actually don't know the 11 particulars in which they work on that front, so I 12 couldn't say exactly how it goes. 13 BY MR. ROTTENBORN: 14 Q Have you ever developed an understanding 15 that she makes posts without the authority of 16 Mr. Depp to make those posts? 17 MS. VASQUEZ: Objection; calls for 18 speculation, assumes facts, calls for hearsay. 19 THE WITNESS: I'm sorry, Ben. I'm going 20 to have to ask you to repeat that. 21 BY MR. ROTTENBORN: 22 Q Have you ever developed an understanding</p>	<p style="text-align: right;">31</p> <p>1 Q When you were a personal assistant for 2 Mr. Depp, what were your, just generally speaking, 3 job duties? 4 <b>A Coordinating schedule would be a big one, 5 and that would involve organizing travel, 6 coordinating transport, liaising with the films, 7 liaising with the coordinators of the films, the 8 producers of the films, relaying messages, you 9 know, taking him to set, getting him home, things 10 like this. Pretty standard, I suppose, assistant 11 stuff really. Nothing out of the ordinary.</b> 12 Q Was -- and one of your job 13 responsibilities that you had while you were a 14 personal assistant to Mr. Depp was obtaining drugs 15 or alcohol for him, correct? 16 MS. VASQUEZ: Objection; compound, vague, 17 assumes facts, lack of foundation. 18 THE WITNESS: It's occurred on a very rare 19 occurrence. 20 BY MR. ROTTENBORN: 21 Q Mr. Depp would ask you to -- to get drugs 22 for him, right?</p>
<p style="text-align: right;">30</p> <p>1 that she doesn't have the authority to make 2 Instagram posts on behalf of Johnny Depp? 3 <b>A That she doesn't --</b> 4 MS. VASQUEZ: Same objections. 5 THE WITNESS: That she doesn't have the 6 authority? No -- again, yeah, it's the same 7 answer to the previous question, I don't quite -- 8 I don't know exactly what the agreement is between 9 them. I just know that she does -- has assisted 10 him in the past. 11 BY MR. ROTTENBORN: 12 Q But she doesn't get paid for that, you 13 said? 14 MS. VASQUEZ: Asked and answered. 15 THE WITNESS: You froze then. Sorry. 16 BY MR. ROTTENBORN: 17 Q She doesn't get paid for doing -- making 18 those posts, correct? 19 MS. VASQUEZ: Asked and answered. 20 THE WITNESS: Correct, she does not get 21 paid. 22 BY MR. ROTTENBORN:</p>	<p style="text-align: right;">32</p> <p>1 MS. VASQUEZ: Objection -- I'm sorry, I'm 2 sorry, Ben. 3 MR. ROTTENBORN: I'm done. Go ahead, 4 Camille. 5 MS. VASQUEZ: Objection; vague and 6 ambiguous, calls for hearsay, assumes facts. 7 THE WITNESS: "Drugs" is quite a wide 8 term. 9 BY MR. ROTTENBORN: 10 Q On occasion, you would procure illegal or 11 controlled drugs for Mr. Depp, correct? 12 <b>A Again --</b> 13 MS. VASQUEZ: Same objections. 14 THE WITNESS: -- same answer, a very rare 15 occurrence. And also you need to be specific with 16 regards to your -- what you're asking. "Drugs" is 17 a wide term. 18 BY MR. ROTTENBORN: 19 Q And when you did that, you did so knowing 20 that the supply or being involved in the supply of 21 controlled drugs was against the law, correct? 22 MS. VASQUEZ: Objection; assumes facts.</p>



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1 THE WITNESS: I'm aware that certain drugs  
2 are against the law, yes.  
3 BY MR. ROTTENBORN:  
4 Q And nevertheless, you -- on at least some  
5 occasions, you assisted Mr. Depp in procuring for  
6 him drugs that you knew were against the law,  
7 correct?  
8 MS. VASQUEZ: Objection; vague and  
9 ambiguous, assumes facts.  
10 THE WITNESS: I think it's important to  
11 clarify when you say "drugs," Ben. Sorry, I think  
12 it's important to clarify.  
13 BY MR. ROTTENBORN:  
14 Q Sure. Understood.  
15 So you knew that Mr. Depp used cocaine,  
16 right?  
17 MS. VASQUEZ: Objection; calls for  
18 speculation, assumes facts, and vague and  
19 ambiguous as to time.  
20 THE WITNESS: I was aware -- I was aware  
21 that it had been used. Again, a rare occurrence  
22 as far as I was aware.

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1 BY MR. ROTTENBORN:  
2 Q You helped procure cocaine for Mr. Depp's  
3 use on at least some occasions, correct?  
4 MS. VASQUEZ: Objection; vague and  
5 ambiguous, assumes facts.  
6 THE WITNESS: No.  
7 BY MR. ROTTENBORN:  
8 Q Never?  
9 MS. VASQUEZ: Asked and answered.  
10 THE WITNESS: No, I didn't procure  
11 cocaine.  
12 BY MR. ROTTENBORN:  
13 Q You helped Mr. Depp procure Ecstasy on at  
14 least some occasions, correct?  
15 MS. VASQUEZ: Objection; assumes facts.  
16 THE WITNESS: I did not procure Ecstasy on  
17 behalf of Mr. Depp.  
18 BY MR. ROTTENBORN:  
19 Q And you testified -- just to be sure --  
20 and I know I've asked this, but you testified that  
21 you never helped Mr. Depp obtain cocaine?  
22 A To the genuinely best of my knowledge, I

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1 do not -- I do not recall. If it ever occurred,  
2 it was in the UK. It was never in the US and it  
3 was never in Australia. But I do not recall. I  
4 certainly don't recall Ecstasy.  
5 MR. ROTTENBORN: Catherine, can you pull  
6 up the Exhibit 1, please, and if you can go to  
7 page 746, please.  
8 BY MR. ROTTENBORN:  
9 Q And, Mr. Deuters, isn't it -- if you look  
10 at lines four through 12, I'm going to read you  
11 two questions and two answers that you gave in the  
12 UK, and I'm going to ask you if I read that right.  
13 Line four, question: You have explained  
14 cannabis, but whitey, or cocaine, was something  
15 that Mr. Depp did ask you to become involved with.  
16 Do you agree or not?  
17 Answer: Sorry, I do not really --  
18 Question: Involved in supplying. He  
19 wanted to get ahold of some cocaine, and you would  
20 be involved in the supply chain, making sure he  
21 got it?  
22 Answer: Again, I suppose I go back to my

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1 first answer -- on very rare occasions.  
2 Did I read that right?  
3 A Yes.  
4 Q So you'd agree that you did on at least  
5 rare occasions assist Mr. Depp in obtaining  
6 cocaine?  
7 MS. VASQUEZ: Objection; misstates prior  
8 testimony, assumes facts, hearsay, asked and  
9 answered.  
10 THE WITNESS: Again, supply chain...  
11 I'm sorry. Is there a question?  
12 BY MR. ROTTENBORN:  
13 Q Yeah. My question was on at least some  
14 occasions you did assist Mr. Depp in obtaining  
15 cocaine, correct?  
16 A Again, I don't --  
17 MS. VASQUEZ: Objection.  
18 THE WITNESS: Sorry, sorry.  
19 I don't recall. If it ever did happen, it  
20 was in the UK. I never purchased it. But supply  
21 chain, I don't know. Not quite sure.  
22 MR. ROTTENBORN: Catherine, you can take



37  
1 that down for the moment.  
2 BY MR. ROTTENBORN:  
3 Q You assisted Mr. Depp in obtaining  
4 Klonopin, right?  
5 MS. VASQUEZ: Objection; assumes facts,  
6 vague.  
7 THE WITNESS: I don't really know what  
8 Klonopin is. I think that's a prescribed drug  
9 that I believe he had from his doctor, but I  
10 wasn't involved.  
11 BY MR. ROTTENBORN:  
12 Q And Mr. Depo -- you became aware of  
13 Mr. Depp abusing drugs that had been prescribed to  
14 him and using them in excess of the quantities  
15 they had been prescribed, correct?  
16 MS. VASQUEZ: Objection; calls for  
17 speculation, assumes facts, lack of foundation,  
18 calls for a medical opinion, calls for hearsay.  
19 THE WITNESS: Yeah, I can't really comment  
20 because -- in terms of abusing, I mean, I'm not --  
21 yeah, I'm not a doctor. I mean, I don't know. In  
22 terms of using, I wouldn't know how to put it on

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1 the scale, I suppose. I don't -- I can't really  
2 answer that in all honesty.  
3 BY MR. ROTTENBORN:  
4 Q Well, Mr. Deuters, I mean, it's no state  
5 secret here Mr. Depp abused prescription drugs,  
6 correct?  
7 MS. VASQUEZ: Objection; vague and  
8 ambiguous, calls for speculation, calls for  
9 opinion -- expert opinions.  
10 THE WITNESS: Yeah, I don't think it's my  
11 position to say if he did or not.  
12 BY MR. ROTTENBORN:  
13 Q Johnny had a problem with opiates, right?  
14 MS. VASQUEZ: Same objections.  
15 THE WITNESS: Again, I'm not sure about  
16 the word "problem." I know that opiates were part  
17 of a regime for a period.  
18 MR. ROTTENBORN: Catherine, can you pull  
19 up that exhibit again, please, and go down to  
20 page 752, please.  
21 BY MR. ROTTENBORN:  
22 Q Mr. Deuters, isn't it true that on line

39  
1 10, on page 752 under oath in the United Kingdom  
2 you were asked the question: He had a problem  
3 with opiates?  
4 And your answer was, yes, opiates is what  
5 I recall at the time, yes.  
6 Did I read that right?  
7 A I'm not seeing it on here, sorry.  
8 Q Page 752, line 10.  
9 A Oh, yeah.  
10 Q Question: He had a problem with opiates?  
11 Answer: Yes, opiates is what I recall at  
12 the time, yes?  
13 A Well, I'm just sort of saying opiates is  
14 what I recall being taken at the time, I suppose.  
15 As to whether it was a problem, again it's not  
16 really for me to say.  
17 Q But I read that right, correct?  
18 A Yes.  
19 Q You also -- you knew that Mr. Depp used  
20 Ecstasy from time to time, right?  
21 MS. VASQUEZ: Objection; vague, calls for  
22 speculation.

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1 THE WITNESS: I'm not -- I mean, I was  
2 aware that it had been occasionally around.  
3 Again, very rare occurrence. I don't know if I  
4 ever saw it. I can't recall at this point.  
5 BY MR. ROTTENBORN:  
6 Q In fact, you supplied Ecstasy to him from  
7 time to time, correct?  
8 MS. VASQUEZ: Objection; asked and  
9 answered, assumes facts, lack of foundation,  
10 argumentative.  
11 THE WITNESS: I don't ever recall  
12 supplying Ecstasy, no.  
13 BY MR. ROTTENBORN:  
14 Q You supplied marijuana or cannabis  
15 products to him quite regularly, correct?  
16 MS. VASQUEZ: Objection; vague and  
17 ambiguous, calls for speculation, assumes facts.  
18 THE WITNESS: I do recall marijuana, yes,  
19 predominantly in the UK. I don't recall anywhere  
20 outside the UK.  
21 BY MR. ROTTENBORN:  
22 Q Mr. Depp used marijuana quite regularly,



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1 correct?  
2 MS. VASQUEZ: Objection; vague, calls for  
3 speculation.  
4 THE WITNESS: He never touched it in the  
5 first eight or nine years I was with him. It was  
6 only once. The only time -- the first time I saw  
7 marijuana was once he was already engaged in this  
8 relationship.  
9 BY MR. ROTTENBORN:  
10 Q So starting in 2012 or so is when you  
11 first saw him use marijuana?  
12 MS. VASQUEZ: Objection; calls for  
13 speculation.  
14 THE WITNESS: Yes, I suppose. I suppose  
15 that would be accurate.  
16 BY MR. ROTTENBORN:  
17 Q Is marijuana legal in the UK?  
18 MS. VASQUEZ: Objection; calls for a legal  
19 conclusion, calls for speculation, vague as to  
20 time.  
21 THE WITNESS: I think -- I actually don't  
22 know the answer to that question. I think it is

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1 in certain -- within certain arenas (phonetic).  
2 It's not commonly available.  
3 BY MR. ROTTENBORN:  
4 Q So when you were procuring marijuana for  
5 Mr. Depp in the UK, it wasn't, to your knowledge,  
6 done legally or in accordance with any  
7 prescription that he had that may have allowed him  
8 to use it legally in California, correct?  
9 MS. VASQUEZ: Objection; compound, calls  
10 for speculation, asked and answered, assumes  
11 facts.  
12 THE WITNESS: I don't know what the  
13 California laws are, so I couldn't talk to that.  
14 BY MR. ROTTENBORN:  
15 Q You weren't getting marijuana in the UK  
16 for Mr. Depp from any sort of legal pharmacy or  
17 anything like that or dispensary that you knew of,  
18 right?  
19 MS. VASQUEZ: Objection; compound, assumes  
20 facts, it's vague.  
21 BY MR. ROTTENBORN:  
22 Q You can answer.

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1 A Sorry, Ben. You're going to have to  
2 repeat the question.  
3 Q You weren't obtaining marijuana for  
4 Mr. Depp in the UK from any sort of legal  
5 dispensary or pharmacy, right?  
6 MS. VASQUEZ: Same objections.  
7 THE WITNESS: Legal dispensary, no.  
8 BY MR. ROTTENBORN:  
9 Q And when you supplied controlled drugs to  
10 Mr. Depp, you did so knowing that the supplier  
11 being involved in the supply of controlled drugs  
12 is against the law, right?  
13 MS. VASQUEZ: Objection; assumes facts,  
14 lack of foundation, calls for a legal conclusion,  
15 argumentative, asked and answered, misstates prior  
16 testimony, it's also compound.  
17 BY MR. ROTTENBORN:  
18 Q You can answer.  
19 A Yes.  
20 Q And you did that because your loyalty was  
21 to Mr. Depp and to make sure that he got what he  
22 wanted, correct?

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1 MS. VASQUEZ: Objection; argumentative,  
2 compound, assumes facts, vague and ambiguous.  
3 THE WITNESS: I think it's important to  
4 reiterate these were very rare occurrences.  
5 MR. ROTTENBORN: Catherine, can you pull  
6 up the exhibit, please, Exhibit 1, and go to  
7 page 740, please.  
8 BY MR. ROTTENBORN:  
9 Q And, Mr. Deuters, on page 740, line 15 of  
10 the transcript of your UK testimony, you were  
11 asked, you nonetheless did that because your  
12 loyalty was to Mr. Depp and to make sure he got  
13 what he wanted?  
14 And you answered, yes.  
15 Correct?  
16 A Yes.  
17 MS. VASQUEZ: Objection -- sorry,  
18 Mr. Deuters.  
19 Objection; vague, calls for hearsay,  
20 improper impeachment.  
21 BY MR. ROTTENBORN:  
22 Q Now, Mr. Depp drinks quite a bit of --

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1 MR. ROTTENBORN: You can take that down,  
2 Catherine. Thank you.  
3 BY MR. ROTTENBORN:  
4 Q Mr. Depp drinks quite a bit of alcohol,  
5 correct?  
6 MS. VASQUEZ: Objection; vague and  
7 ambiguous, and calls for speculation.  
8 THE WITNESS: Again, yeah, quite a bit.  
9 I'm not sure what you mean by "quite a bit."  
10 BY MR. ROTTENBORN:  
11 Q And I guess I'm specifically referring to  
12 the 2011 to 2016 time period when Mr. Depp was  
13 with Ms. Heard, okay?  
14 A Right, okay.  
15 Q He, Mr. Depp, has gone through periods of  
16 sobriety during that time frame, correct, or where  
17 he tried to be sober, right?  
18 MS. VASQUEZ: Objection; calls for  
19 speculation, assumes facts.  
20 THE WITNESS: Yes, he was certainly sober  
21 during periods of that completely, yeah.  
22 BY MR. ROTTENBORN:

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1 Q And then there were periods of time when  
2 he drank excessive amounts of alcohol and was  
3 frequently drunk or intoxicated, correct?  
4 MS. VASQUEZ: Objection; calls for  
5 speculation.  
6 THE WITNESS: Again -- sorry.  
7 MS. VASQUEZ: Sorry. And vague.  
8 THE WITNESS: Again, excessive, I mean,  
9 you know, there's no pretending that he wasn't  
10 drinking during that period. But he has a  
11 remarkable tolerance, so, you know, whether he was  
12 drunk or -- yeah, I'm not a doctor, so I couldn't  
13 tell you.  
14 BY MR. ROTTENBORN:  
15 Q When you say "remarkable tolerance," do  
16 you mean he can drink a significant amount of  
17 alcohol without seeming as drunk as you might  
18 think he would be?  
19 MS. VASQUEZ: Objection; calls for  
20 speculation, assumes facts, misstates the prior  
21 testimony.  
22 BY MR. ROTTENBORN:

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1 Q Go ahead.  
2 A Yes. I mean, he can -- yeah, he drinks  
3 and he maintains himself very well.  
4 MR. ROTTENBORN: Catherine, can you,  
5 please --  
6 BY MR. ROTTENBORN:  
7 Q Well, actually before we go there, you  
8 said "he maintains himself very well."  
9 You've seen Mr. Depp drunk on a number of  
10 occasions, right?  
11 MS. VASQUEZ: Objection; calls for  
12 speculation, assumes facts, vague and ambiguous.  
13 THE WITNESS: I've seen many people drunk  
14 on many occasion, nothing particularly out of the  
15 ordinary.  
16 BY MR. ROTTENBORN:  
17 Q Including Mr. Depp, right?  
18 A But nothing --  
19 MS. VASQUEZ: Same objections.  
20 THE WITNESS: Nothing out of the ordinary.  
21 BY MR. ROTTENBORN:  
22 Q Have you ever seen Mr. Depp destroy

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1 property?  
2 MS. VASQUEZ: Objection; vague.  
3 THE WITNESS: Destroy property? Like a  
4 house?  
5 BY MR. ROTTENBORN:  
6 Q Personal property, have you ever seen him  
7 destroy anything?  
8 MS. VASQUEZ: Same objections.  
9 THE WITNESS: No, not to the best of my  
10 knowledge. Destroy, no, that's not a term I'd  
11 use.  
12 BY MR. ROTTENBORN:  
13 Q Have you ever seen him break glasses?  
14 MS. VASQUEZ: Objection; vague.  
15 THE WITNESS: At this time, at this  
16 minute, I can't recall an instance where I saw a  
17 glass break.  
18 BY MR. ROTTENBORN:  
19 Q Have you ever seen him break TVs?  
20 MS. VASQUEZ: Same objection.  
21 THE WITNESS: No.  
22 BY MR. ROTTENBORN:



<p style="text-align: right;">49</p> <p>1 Q Have you ever seen him slam cupboard doors 2 out of anger? 3 MS. VASQUEZ: Objection; vague, ambiguous. 4 THE WITNESS: No, not in person, no. 5 BY MR. ROTTENBORN: 6 Q Mr. Depp's drink of choice is red wine, 7 correct? 8 MS. VASQUEZ: Objection; calls for 9 speculation, vague. 10 THE WITNESS: He likes red -- I mean, yes, 11 red wine is a drink that he would drink, yes. 12 MR. ROTTENBORN: Catherine, can you pull 13 up the exhibit titled Depp 11242, please. 14 THE TECHNICIAN SPECIALIST: Standby. 15 Exhibit 2. 16 MR. ROTTENBORN: Thank you. 17 Move for the admission of Exhibit 2 into 18 evidence. 19 (Exhibit No. 2 was marked for 20 identification.) 21 BY MR. ROTTENBORN: 22 Q Mr. Deuters, we're going to be seeing</p>	<p style="text-align: right;">51</p> <p>1 that these are text messages that you sent or 2 received? 3 MS. VASQUEZ: Objection; misstates prior 4 testimony. 5 BY MR. ROTTENBORN: 6 Q You can answer. 7 <b>A I have no reason to necessarily doubt, no, 8 but I don't remember them in particular.</b> 9 Q And would you agree that the entries that 10 say "him" next to them, that's Johnny Depp's 11 number, right? 12 <b>A Yep.</b> 13 Q And Mr. Depp also communicated through an 14 e-mail that you see here on page 15 richardtat@aol.com, right? 16 MS. VASQUEZ: Objection; calls for 17 speculation. 18 BY MR. ROTTENBORN: 19 Q You understood that to be one of 20 Mr. Depp's e-mail addresses? 21 <b>A Yeah.</b> 22 MS. VASQUEZ: Same objection.</p>
<p style="text-align: right;">50</p> <p>1 a lot of documents that look like this or similar 2 to this today. And I'll represent to you that 3 these are documents from the production in this 4 case either from you or from Amber or from Johnny 5 that set forth, I believe, text messages between 6 various individuals. 7 So with that in mind, is -- if you look at 8 the two -- I'm sorry -- the four entries at the 9 bottom of the page, is the number next to where it 10 says Stephen Deuters -- is that your number? 11 <b>A Yeah.</b> 12 Q And do you agree that these are text 13 messages that you were either sent or received? 14 MS. VASQUEZ: Objection; vague, ambiguous, 15 calls for speculation. 16 BY MR. ROTTENBORN: 17 Q You can answer. 18 <b>A You know, I'm looking at the date. That 19 was 2012, so I'd say a long time ago, so I 20 obviously don't have any particular recollection 21 of these precise.</b> 22 Q Sure. Do you have any reason to doubt</p>	<p style="text-align: right;">52</p> <p>1 BY MR. ROTTENBORN: 2 Q And same with Chris Dembrowski, did he 3 have an e-mail that he would communicate with that 4 was -- made it appear that it was coming from 5 someone name Chris Dembrowski? 6 MS. VASQUEZ: Vague and ambiguous, same 7 objection. 8 THE WITNESS: I don't recall. I don't 9 know that one. 10 BY MR. ROTTENBORN: 11 Q Do you see the fourth text up from the 12 bottom, Mr. Depp -- you can see in the column it 13 says from, Mr. Depp writes, marijuana works. 14 Waiting on painkillers. 15 Do you see that? 16 <b>A Yep.</b> 17 Q And that was on November 10th of 2012; do 18 you see that? 19 <b>A Yeah.</b> 20 Q Okay. And then the text underneath it -- 21 and, again, I'm not sure -- I'm not suggesting 22 that these have come in in sequence or sometimes</p>

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1 there either may have been texts that are not  
2 between them, so -- but on December 1st of 2012,  
3 you sent a text that says, KLNPN and LXPR updates.  
4 Do you see that?  
5 **A Yeah.**  
6 Q KLNPN means Klonopin, right?  
7 MS. VASQUEZ: Objection; calls for  
8 speculation.  
9 THE WITNESS: It's possible.  
10 BY MR. ROTTENBORN:  
11 Q And Klonopin --  
12 **A I genuinely don't recall the text off the**  
13 **top of my head, not that I have any reason to**  
14 **doubt, but...**  
15 Q And does LXPR stand for Lexapro?  
16 MS. VASQUEZ: Same objection.  
17 THE WITNESS: Yeah, same answer, no reason  
18 to doubt it, but I don't recall it, the specific  
19 text or writing it, so I couldn't a hundred  
20 percent say.  
21 BY MR. ROTTENBORN:  
22 Q Okay. And the next beneath that from the

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1 same date, same time, you write, chasing ice DVD,  
2 and drugs.  
3 Do you see that?  
4 **A Yeah.**  
5 Q What did you mean by "ice" in that text?  
6 MS. VASQUEZ: Objection; calls for  
7 speculation, vague.  
8 THE WITNESS: Probably ice.  
9 BY MR. ROTTENBORN:  
10 Q What did you mean by "drugs"?  
11 MS. VASQUEZ: Same objections.  
12 THE WITNESS: Probably -- probably his --  
13 what do you call it, his prescriptions, which  
14 would be given to me invariably by Joel Mandel  
15 because that was just how it -- that was the way  
16 those things were given.  
17 Q Joel Mandel obtained all of Johnny's  
18 prescriptions for him; is that your testimony?  
19 **A I believe --**  
20 MS. VASQUEZ: Objection; misstates --  
21 Mr. Deuters, sorry, I need to -- misstates prior  
22 testimony, assumes facts, calls for hearsay, calls

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1 for speculation -- well...  
2 THE WITNESS: Joel Mandel -- I mean, yeah,  
3 I mean, he was -- from what I recall. I mean, it  
4 was a while ago now.  
5 BY MR. ROTTENBORN:  
6 Q So this text is you saying that you are  
7 attempting to obtain drugs of some sort for  
8 Mr. Depp, correct?  
9 MS. VASQUEZ: Objection; misstates the  
10 document, misstates prior testimony, assumes  
11 facts, hearsay.  
12 THE WITNESS: Yeah, I mean, I'm  
13 speculating on myself here, but I would assume  
14 it's collecting any prescriptions from Mandel.  
15 BY MR. ROTTENBORN:  
16 Q And there were times when you obtained  
17 drugs -- well, actually strike that.  
18 MR. ROTTENBORN: Let's pull up the next  
19 document, please. It's Depp 11244, please.  
20 And I'll move this in as Exhibit 3.  
21 MS. VASQUEZ: We've been going for about  
22 an hour, so whenever, Ben, you get to a stopping

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1 point for like a 10-minute break, I'd appreciate  
2 that.  
3 MR. ROTTENBORN: Sure. Five more minutes  
4 and we can stop.  
5 THE TECHNICIAN SPECIALIST: Exhibit 3.  
6 (Exhibit No. 3 was marked for  
7 identification.)  
8 BY MR. ROTTENBORN:  
9 Q Mr. Deuters, if you take a look at the  
10 fourth text down -- and if you need this blown up,  
11 we can do that or the techs --  
12 **A That's good.**  
13 Q Okay. Do you see the text from Mr. Depp  
14 to you that says, must procure many, many more  
15 from Joel. Need them immediately, three  
16 exclamation points, now, three exclamation points?  
17 **A Yes.**  
18 Q And then right beneath that, do you see  
19 the text that says, it must be acquired,  
20 repackaged as vitamin gel caps and put on a fast  
21 horse? And then you sent him a text that says,  
22 resealed, comma, I missed.



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1 Do you see that?  
2 **A Yeah.**  
3 Q Do you -- I'm sorry -- not you -- I  
4 misspoke. He sends you then another text that  
5 said, resealed. I missed.  
6 Do you see that?  
7 **A Yeah.**  
8 Q Okay. Do you recall what it was that  
9 Mr. Depp was saying needed to be ring packaged as  
10 vitamin gel caps and put on a fast horse?  
11 MS. VASQUEZ: Objection --  
12 BY MR. ROTTENBORN:  
13 Q I assume he wasn't talking about vitamins,  
14 right?  
15 MS. VASQUEZ: Objection; calls for  
16 speculation, assumes facts, hearsay.  
17 THE WITNESS: Again, that was -- what's  
18 the date on that? 28th of January 2013. I  
19 genuinely couldn't tell you what -- you'll see the  
20 name Joel there because -- so that's a  
21 prescription item because that was -- but I  
22 genuinely don't know specifically what he's

58  
1 referring to. Maybe it was the marijuana gel caps  
2 that Joel got. I'm not...  
3 BY MR. ROTTENBORN:  
4 Q And to the best of your understanding, why  
5 would marijuana gel caps need to be repackaged as  
6 vitamin gel caps?  
7 MS. VASQUEZ: Objection; calls for  
8 speculation.  
9 THE WITNESS: I don't know. Law  
10 enforcement obviously, but maybe it's a different  
11 kind of marijuana. I don't know. I genuinely  
12 don't know. I'd be entirely speculating myself.  
13 BY MR. ROTTENBORN:  
14 Q And were there times when you did, in  
15 fact, repackage a certain marijuana product or  
16 other drug as a vitamin gel cap for Mr. Depp at  
17 his request?  
18 MS. VASQUEZ: Objection; assumes facts,  
19 compound, lack of foundation.  
20 THE WITNESS: I don't recall doing it  
21 myself; no, I don't.  
22 BY MR. ROTTENBORN:

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1 Q Do you recall anyone else doing it?  
2 MS. VASQUEZ: Objection; calls for  
3 hearsay, calls for speculation, vague.  
4 THE WITNESS: No. I mean, I would have to  
5 give it a no. I mean, I can't -- I mean, I can  
6 see the text in front of me, but the actual act of  
7 it, I generally can't, no.  
8 MR. ROTTENBORN: Can you pull up, please,  
9 the exhibit that -- I believe the name is just  
10 H30.2.  
11 THE TECHNICIAN SPECIALIST: Please  
12 standby.  
13 MR. ROTTENBORN: I believe it's H30.2,  
14 file seven, Depp vs. NGN is what it is.  
15 Camille, I think after this exhibit, it's  
16 a good time for a break.  
17 MS. VASQUEZ: Okay.  
18 THE TECHNICIAN SPECIALIST: Exhibit 4.  
19 MR. ROTTENBORN: Thank you.  
20 (Exhibit No. 4. Was marked for  
21 identification.)  
22 MR. ROTTENBORN: If you can maybe just

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1 blow up the bottom half of that first page,  
2 please.  
3 BY MR. ROTTENBORN:  
4 Q Can you see that okay, Mr. Deuters?  
5 **A Yes.**  
6 Q Did you ever hear Mr. Depp refer to  
7 Ecstasy as happy pills?  
8 MS. VASQUEZ: Objection; vague, ambiguous,  
9 calls for speculation and hearsay.  
10 THE WITNESS: Again, I don't recall any  
11 specific instances. I'm aware that's a generic  
12 term.  
13 BY MR. ROTTENBORN:  
14 Q Who is Nathan Holmes?  
15 **A Nathan Holmes was Johnny's assistant for a  
16 period of time.**  
17 Q Did you and he both serve in personal  
18 assistant roles to Johnny at the same time?  
19 **A Yes.**  
20 Q Do you see, oh, about seven or eight texts  
21 from the bottom of the page, the one whose number  
22 on the left-hand side is 80039 --



<p>61</p> <p>1 <b>A Yeah.</b></p> <p>2 Q -- that says, have you heard from Manson's</p> <p>3 Ryan?</p> <p>4 Do you see that?</p> <p>5 <b>A Yeah.</b></p> <p>6 Q Did Marilyn Manson have a drug dealer</p> <p>7 named Ryan that would at times supply Mr. Depp</p> <p>8 with illegal drugs?</p> <p>9 MS. VASQUEZ: Objection; calls for</p> <p>10 speculation, hearsay, assumes facts, lack of</p> <p>11 foundation, compound.</p> <p>12 THE WITNESS: Manson -- there was an</p> <p>13 assistant called Ryan. I know I've heard the name</p> <p>14 connected to Manson. But beyond that, I couldn't</p> <p>15 comment.</p> <p>16 BY MR. ROTTENBORN:</p> <p>17 Q He was an assistant to Marilyn Manson?</p> <p>18 MS. VASQUEZ: Objection; calls for</p> <p>19 speculation.</p> <p>20 THE WITNESS: Again, I believe so, that</p> <p>21 was my understanding, but I don't know if I had</p> <p>22 many dealings with him. I don't recall.</p>	<p>63</p> <p>1 MS. VASQUEZ: Objection; calls for</p> <p>2 speculation, hearsay, improper use of the</p> <p>3 document, lack of foundation.</p> <p>4 THE WITNESS: Genuinely something I don't</p> <p>5 recall, no. If -- you know, if one of us, let's</p> <p>6 say, was going to see Johnny, maybe I'd have a</p> <p>7 post bits and pieces. You know, it could be</p> <p>8 anything. But do I recall anything specific,</p> <p>9 anything told to me, no, I absolutely do not.</p> <p>10 BY MR. ROTTENBORN:</p> <p>11 Q But it's possible that you did pass along</p> <p>12 pills for Johnny on or about February 27th, 2015,</p> <p>13 correct?</p> <p>14 MS. VASQUEZ: Objection; vague, calls for</p> <p>15 speculation, asked and answered.</p> <p>16 THE WITNESS: Yeah, I'd be speculating on</p> <p>17 myself there because I really couldn't tell.</p> <p>18 BY MR. ROTTENBORN:</p> <p>19 Q Okay. Let's go to the next page, please.</p> <p>20 At the top of the page there's a text that says,</p> <p>21 yay. Hello, Master D.</p> <p>22 Mr. Depp called you Master Deuters at</p>
<p>62</p> <p>1 BY MR. ROTTENBORN:</p> <p>2 Q Okay. And if you look at the text</p> <p>3 messages -- and I realize you're not on some of</p> <p>4 these, so -- but if you read down, there's a text</p> <p>5 that says, have you heard from Manson's Ryan?</p> <p>6 From Johnny.</p> <p>7 And then someone at nathanholmes4@mac</p> <p>8 says, I have. He asked if you want anything</p> <p>9 med-wise for tomorrow night.</p> <p>10 And then Johnny writes, yes and yes. And,</p> <p>11 of course, yes, please. And you will way Ryan for</p> <p>12 it.</p> <p>13 And then says, disappear. We should have</p> <p>14 more happy pills. Can you?</p> <p>15 And then the nathanholmes4@mac address</p> <p>16 writes, yes, we can. I'm giving them to Stephen</p> <p>17 to give you, yay, XX.</p> <p>18 Do you see that?</p> <p>19 <b>A Yes.</b></p> <p>20 Q Did Nathan Holmes give you happy pills or</p> <p>21 pills or -- of some sort to give to Johnny on or</p> <p>22 about February 27th or 28th of 2015?</p>	<p>64</p> <p>1 times, right?</p> <p>2 <b>A Yes.</b></p> <p>3 Q And he says, I say I do believe that Ryan</p> <p>4 Munson's gave you a wee baggage for me. Where</p> <p>5 does it reside? X.</p> <p>6 Do you see that?</p> <p>7 <b>A Yes.</b></p> <p>8 Q And you reply, tis is in your green bag,</p> <p>9 sir, toward the left-hand corner. X.</p> <p>10 Do you see that?</p> <p>11 <b>A Yes.</b></p> <p>12 Q And that was a text message that you sent</p> <p>13 to Mr. Depp in response to his text message asking</p> <p>14 where the wee baggage from Ryan was, right?</p> <p>15 MS. VASQUEZ: Objection; misstates the</p> <p>16 document, assumes facts, hearsay.</p> <p>17 THE WITNESS: I can only comment on what I</p> <p>18 see in front of me, and it would seem to be a</p> <p>19 response, yes. But do I have any recollection?</p> <p>20 No, I'm afraid I don't.</p> <p>21 MR. ROTTENBORN: And just so the record is</p> <p>22 clear, can you pull up the document entitled Depp</p>



<p style="text-align: right;">65</p> <p>1 11296, please. 2 THE TECHNICIAN SPECIALIST: Exhibit 5. 3 (Exhibit No. 5 was marked for 4 identification.) 5 MR. ROTTENBORN: Thank you. 6 BY MR. ROTTENBORN: 7 Q And just if you go to the bottom of that 8 page, please, do you agree that these are the same 9 two text messages that we just looked at in the 10 prior document? 11 MS. VASQUEZ: Objection; vague. 12 THE WITNESS: I mean, they look the same 13 from -- 14 BY MR. ROTTENBORN: 15 Q Okay. And I was just asking you because 16 in the other document in the text it says, yay. 17 Hello, Master D. 18 It wasn't clear to me who the recipient 19 was, but that was -- you can see in this document 20 that that was -- that was a text message that 21 Mr. Depp sent to you on February 28th, 2015, 22 correct?</p>	<p style="text-align: right;">67</p> <p>1 speculating, and I genuinely wouldn't know. I 2 don't know. 3 MR. ROTTENBORN: Catherine, can you pull 4 up Exhibit 1, please, and scroll down to page 815, 5 please. 6 BY MR. ROTTENBORN: 7 Q And at the bottom of page 815, line 22, 8 you were asked the question, now you have seen the 9 full extent of the texts. Would you agree it 10 looks as if it is the supply of happy pills, not 11 marijuana? 12 And your answer was, yes. Looking at 13 those texts, yes, perfectly possible. 14 Did I read that right? 15 <b>A I'm trying to see where it is. Perfectly 16 possible, all right, at the bottom of the page, 17 yeah, I see it, yeah.</b> 18 MR. ROTTENBORN: I think now is a good 19 time for a break. Thank you. 20 THE VIDEOGRAPHER: Ms. Vasquez? 21 MS. VASQUEZ: That's fine, thanks. 22 Mr. Deuters, if I can just remind you to</p>
<p style="text-align: right;">66</p> <p>1 MS. VASQUEZ: Objection; calls for a 2 conclusion. 3 THE WITNESS: I mean, again, just in the 4 document in front of me, that's how it would 5 appear, yeah. 6 BY MR. ROTTENBORN: 7 Q And you'd agree having seen these text 8 messages that it looks as if you're discussing the 9 supply of something called happy pills, correct? 10 MS. VASQUEZ: Objection; misstates the 11 document, misstates prior testimony, assumes 12 facts, vague, calls for speculation, asked and 13 answered. 14 THE WITNESS: Yeah, because I don't recall 15 these. I mean, all it says is wee baggage, wee 16 baggage. 17 BY MR. ROTTENBORN: 18 Q And the wee baggage is -- it's possible 19 that that's referring to happy pills, right? 20 MS. VASQUEZ: Same objections, calls for 21 speculation. 22 THE WITNESS: Again, I'd be totally</p>	<p style="text-align: right;">68</p> <p>1 turn off your camera and put yourself on mute 2 while we're on break. 3 THE WITNESS: All right. 4 THE VIDEOGRAPHER: Off record 1:36. 5 (A recess was taken.) 6 THE VIDEOGRAPHER: On record 1:48. 7 BY MR. ROTTENBORN: 8 Q There were times when during the course of 9 your job as a personal assistant for Mr. Depp when 10 Mr. Depp passed out from drinking or drugs, 11 correct? 12 MS. VASQUEZ: Objection; compound, calls 13 for speculation, vague as to time. 14 THE WITNESS: Again, very rare occurrence. 15 There was something way back in 2011, but I -- you 16 know, it wasn't something, no, that was a rare -- 17 a common occurrence, no. I don't recall any 18 specific -- 19 BY MR. ROTTENBORN: 20 Q What was the incident in 2011? 21 MS. VASQUEZ: Objection; relevance. 22 BY MR. ROTTENBORN:</p>



<p style="text-align: right;">69</p> <p>1 Q You can answer. 2 A I think it was -- well, it's in the UK 3 transcript. 4 Q Right. Give me your best recollection 5 now, please. 6 A I just remember it was -- it was -- I 7 think it was after filming. I think it was after 8 filming one time, that was it. That's the only 9 real time I can recall. 10 Q Okay. Mr. Depp regardless of -- I'm not 11 asking you the reasons for it, but Mr. Depp could 12 be hard to wake up, couldn't he? 13 MS. VASQUEZ: Objection; vague and 14 ambiguous, calls for speculation. 15 THE WITNESS: Hard to wake up -- 16 MS. VASQUEZ: That's unintelligible. 17 THE WITNESS: No, I'm not quite sure how 18 to answer that. 19 BY MR. ROTTENBORN: 20 Q Well, you saw him when he was -- when you 21 were in the same location as he was, you saw him 22 just about every day, right?</p>	<p style="text-align: right;">71</p> <p>1 THE WITNESS: Yeah, the term "hard" is 2 strange. On occasion, I would wake him up to go 3 to work, yes. 4 BY MR. ROTTENBORN: 5 Q Other than the incident in 2011 that you 6 referred to, can you -- are there any other 7 instances that you can recall where Mr. Depp was 8 passed out in your view as a result of drugs or 9 alcohol? 10 MS. VASQUEZ: Objection; compound, calls 11 for speculation, assumes facts, lack of 12 foundation. 13 THE WITNESS: At this point -- at this 14 point in time, I can't recall, no. 15 MR. ROTTENBORN: Can you pull up the 16 document titled Depp 11312, please, Catherine. 17 THE TECHNICIAN SPECIALIST: Please 18 standby. 19 Exhibit 6. 20 (Exhibit No. 6 was marked for 21 identification.) 22 MR. ROTTENBORN: And I'll move this into</p>
<p style="text-align: right;">70</p> <p>1 MS. VASQUEZ: Objection; assumes facts, 2 vague. 3 THE WITNESS: Yeah. I mean, if we were 4 traveling, most days, yeah, that's a fair 5 assumption. 6 BY MR. ROTTENBORN: 7 Q And part of your job would be to get him 8 where he needed to be on time or as close to on 9 time as possible, right? 10 MS. VASQUEZ: Objection; assumes facts. 11 THE WITNESS: Yeah. 12 BY MR. ROTTENBORN: 13 Q And that could include waking him up if he 14 was asleep, right? 15 MS. VASQUEZ: Objection; assumes facts. 16 THE WITNESS: It could. It could, sure. 17 BY MR. ROTTENBORN: 18 Q And there were times when Mr. Depp was 19 asleep at all hours of the day and he was hard to 20 wake up, right? 21 MS. VASQUEZ: Objection; compound, asked 22 and answered, assumes facts.</p>	<p style="text-align: right;">72</p> <p>1 evidence. And I'll just make a statement for the 2 record that all of the exhibits shown today I'm 3 going to make into evidence. 4 BY MR. ROTTENBORN: 5 Q Mr. Deuters, if you look at the third text 6 down, that's a text from you to Mr. Depp on 7 June 30th, 2015, right? 8 A Yeah. 9 Q And in that text you're telling him, 10 hopefully you won't read this till the morning. 11 You passed out in the M, slash, up trailer. 12 I assume that means makeup trailer, right? 13 MS. VASQUEZ: Objection; calls for 14 speculation. 15 BY MR. ROTTENBORN: 16 Q Well, you wrote it. So does that mean -- 17 M, slash, up mean makeup trailer? 18 A Yes. 19 Q So you're telling Mr. Depp he passed out 20 in the makeup trailer, and then you say, we 21 couldn't quite get you up the stairs. 22 Do you see that?</p>



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1 **A Yep.**  
2 Q Do you recall this incident as one where  
3 Mr. Depp had fallen off the wagon?  
4 MS. VASQUEZ: Objection; vague, ambiguous,  
5 calls for speculation, assumes facts.  
6 THE WITNESS: I don't recall, sorry.  
7 MR. ROTTENBORN: Catherine, can you pull  
8 up Exhibit 1, please, and take us to page 830,  
9 please.  
10 BY MR. ROTTENBORN:  
11 Q And on line 12, you were asked the  
12 question of page 830, what you said is, hopefully,  
13 he will not read this till morning, three texts  
14 down. Quote, you passed out in the makeup  
15 trailer. We couldn't quite get you up the stairs.  
16 There is food in the fridge in case you wake up.  
17 So it looks like he has fallen off the wagon; do  
18 you agree?  
19 And your answer on line 17 is, yes, it  
20 would suggest that.  
21 Did I read that right?  
22 **A Yes.**

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1 Q Now, you say later in the text, we told  
2 Amber in case she tried to get ahold of you that  
3 you were exhausted and had taken your meds early  
4 and had gone to sleep after an exhausting day at  
5 work.  
6 Do you see that?  
7 MS. VASQUEZ: I think you have the wrong  
8 exhibit up, Mr. Rottenborn.  
9 MR. ROTTENBORN: Oh, thanks, Camille.  
10 Yeah, Catherine, if you can go back to the  
11 last.  
12 BY MR. ROTTENBORN:  
13 Q Were there times -- do you see the part  
14 I'm referring to in the text?  
15 **A Sorry, Ben. Could you refer to the text?**  
16 Q Sure enough. About halfway down --  
17 MR. ROTTENBORN: And maybe if you can just  
18 blow up that one text, that would be great.  
19 THE WITNESS: Yeah.  
20 BY MR. ROTTENBORN:  
21 Q About halfway down, you say, we told Amber  
22 in case she tried to get ahold of you that you

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1 were exhausted and had taken your meds early and  
2 had gone to bed after an exhausting day of work.  
3 Do you see that?  
4 **A Yeah.**  
5 Q Do you, sitting here today, recall  
6 anything about this particular incident?  
7 MS. VASQUEZ: Objection; asked and  
8 answered, assumes facts, vague.  
9 THE WITNESS: I'm afraid not, I don't, no.  
10 BY MR. ROTTENBORN:  
11 Q Were there ever times where you covered  
12 for Johnny by telling Amber something about his  
13 condition or his whereabouts that wasn't true?  
14 MS. VASQUEZ: Objection; compound, assumes  
15 facts, lack of foundation, vague and ambiguous.  
16 THE WITNESS: Yes. Could you, please,  
17 repeat -- rephrase the question.  
18 BY MR. ROTTENBORN:  
19 Q Were there ever times when you told Amber  
20 a lie about Johnny's condition or his whereabouts  
21 because you were trying to protect Johnny from  
22 anger on Amber's behalf if she were to learn the

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1 truth of his condition or his whereabouts?  
2 **A I don't --**  
3 MS. VASQUEZ: Object -- Mr. Deuters,  
4 sorry.  
5 That's a compound question. Object;  
6 compound, hearsay, assumes facts, lack of  
7 foundation.  
8 BY MR. ROTTENBORN:  
9 Q Go ahead.  
10 **A Again, it's not something I -- it's not  
11 something that I recall something that we did. I  
12 can't -- I can't speculate on any one occasion  
13 when we would have done that or I would have done  
14 that. I don't recall.**  
15 Q Okay. Did -- and just while we have this  
16 up, did -- did Johnny do -- smoke marijuana with  
17 his daughter?  
18 MS. VASQUEZ: Objection; vague, calls for  
19 speculation.  
20 BY MR. ROTTENBORN:  
21 Q I'm just looking at the text. It's two  
22 down from the one we just looked at where Lily

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1 Rose texts him, do you know where I can get weed  
2 in New York?  
3 And I'm just -- do you have any -- did you  
4 ever observe or come to learn of Mr. Depp doing  
5 marijuana with Lily Rose?  
6 MS. VASQUEZ: Objection; calls for  
7 speculation, improper use of a document.  
8 THE WITNESS: I do not.  
9 MR. ROTTENBORN: Can you, please, pull up  
10 the document entitled ALH 17970.  
11 THE TECHNICIAN SPECIALIST: Please  
12 standby.  
13 Exhibit 7.  
14 (Exhibit No. 7 was marked for  
15 identification.)  
16 MR. ROTTENBORN: Thank you. Move for  
17 admission of Exhibit 7.  
18 BY MR. ROTTENBORN:  
19 Q Mr. Deuters, this is a text message  
20 exchange between you and Amber on December 21st,  
21 2015, correct?  
22 MS. VASQUEZ: Objection; calls for a

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1 conclusion.  
2 THE WITNESS: Yeah, I see -- I see her  
3 name, I see my name. 2015, yeah.  
4 BY MR. ROTTENBORN:  
5 Q And you text Amber, the kids are asking  
6 for their dad. I hope you leave soon.  
7 Do you see that?  
8 A Yes.  
9 Q And she says, hey, Stephen, I appreciate  
10 the text, but I'm not keeping him here. He's  
11 downstairs. I'm up in the bed and attempting to  
12 move him is as futile now as it is on any other  
13 day or situation, although I am sorry.  
14 And you write, thank you, Amber. I  
15 appreciate the text. I'm going to send Kevin in  
16 to grab him.  
17 Do you see that?  
18 A Yes.  
19 Q Do you -- do you have any recollection of  
20 this specific occurrence?  
21 MS. VASQUEZ: Objection; vague, ambiguous,  
22 assumes facts, hearsay.

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1 THE WITNESS: I'm looking at the date.  
2 Nothing -- nothing -- 21st of December 2015, yeah,  
3 I don't, I'm afraid. Off the top of my head, I  
4 don't.  
5 BY MR. ROTTENBORN:  
6 Q Is -- what did you understand Ms. Heard to  
7 be saying, attempting to move him is as futile now  
8 as it is on any other day or situation?  
9 MS. VASQUEZ: Objection; calls for  
10 speculation. There's no way for this witness to  
11 know what was in Ms. Heard's head.  
12 MR. ROTTENBORN: Not what I asked. I  
13 asked what did he understand. And that's an  
14 inappropriate speaking objection, so keep those to  
15 yourself, please, Camille.  
16 MS. VASQUEZ: Same objections, calls for  
17 speculation.  
18 THE WITNESS: Again -- well, I mean, it  
19 reads what it reads. I can't speculate as to what  
20 she was thinking or why she'd write that.  
21 BY MR. ROTTENBORN:  
22 Q And, again, I wasn't asking you that. I

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1 was asking what your understanding was of that.  
2 In other words, did you -- had you in the  
3 course of your personal assistant duties to  
4 Mr. Depp encounter situations where it was futile  
5 to try to move him when he was passed out?  
6 MS. VASQUEZ: Objection; asked and  
7 answered, assumes facts.  
8 THE WITNESS: Well, it doesn't say  
9 anything about passed out here. Yeah, sorry, I'm  
10 not sure how to answer that question.  
11 BY MR. ROTTENBORN:  
12 Q Were there ever times when you -- Mr. Depp  
13 was either asleep or kind of in the in between,  
14 between being awake and asleep and you attempted  
15 to communicate with him but weren't sure whether  
16 or not he was hearing what you were saying?  
17 MS. VASQUEZ: Objection; vague, ambiguous,  
18 calls for speculation, compound. Sorry, Ben,  
19 unintelligible. I don't understand that question.  
20 THE WITNESS: In the way you just  
21 described it, nothing specific comes to mind, no.  
22 MR. ROTTENBORN: Let's pull up ALH 17949,



<p style="text-align: right;">81</p> <p>1 please.</p> <p>2 THE TECHNICIAN SPECIALIST: Exhibit 8.</p> <p>3 (Exhibit No. 8 was marked for</p> <p>4 identification.)</p> <p>5 BY MR. ROTTENBORN:</p> <p>6 Q Do you recall a time when Amber and</p> <p>7 Johnny, along with some friends, went to a place</p> <p>8 called Hicksville?</p> <p>9 MS. VASQUEZ: Objection; calls for</p> <p>10 speculation.</p> <p>11 THE WITNESS: I recall the name, but I --</p> <p>12 I wasn't there, and I don't recall being involved</p> <p>13 in anything, planning order. I don't recall.</p> <p>14 BY MR. ROTTENBORN:</p> <p>15 Q Okay. Thank you.</p> <p>16 Do you remember the date that that trip</p> <p>17 took place?</p> <p>18 MS. VASQUEZ: Objection; calls for</p> <p>19 speculation.</p> <p>20 THE WITNESS: I wouldn't be able to tell</p> <p>21 you off the top of my head without researching,</p> <p>22 no.</p>	<p style="text-align: right;">83</p> <p>1 but nodded his head when I told him you were</p> <p>2 coming, so that suggests that -- again, I'm</p> <p>3 speculating myself here, but suggest is</p> <p>4 (indiscernible).</p> <p>5 BY MR. ROTTENBORN:</p> <p>6 Q Do you commonly talk to people when they</p> <p>7 are asleep? That's not common, right?</p> <p>8 MS. VASQUEZ: Objection; argumentative.</p> <p>9 THE WITNESS: If I'm waking my wife or my</p> <p>10 cat, yeah. I mean, I wouldn't have a full</p> <p>11 conversation with someone in their sleep; that</p> <p>12 would be strange.</p> <p>13 BY MR. ROTTENBORN:</p> <p>14 Q And were there times when Johnny like as</p> <p>15 in this text were -- was passed out or asleep and</p> <p>16 you tried to have conversation or convey</p> <p>17 information to him?</p> <p>18 MS. VASQUEZ: Objection; asked and</p> <p>19 answered a third time, assumes facts, compound.</p> <p>20 THE WITNESS: Yeah, I wouldn't have a</p> <p>21 conversation with someone in their sleep, no;</p> <p>22 that's peculiar.</p>
<p style="text-align: right;">82</p> <p>1 MR. ROTTENBORN: If you can scroll down on</p> <p>2 the document, please.</p> <p>3 BY MR. ROTTENBORN:</p> <p>4 Q Do you see the text from Amber to you that</p> <p>5 says, hey, there. Any luck waking my hillbilly?</p> <p>6 A Yes.</p> <p>7 Q Underneath that, you write, Mustaffa will</p> <p>8 be with you in ten min. JD is asleep on couch but</p> <p>9 nodded his head when I told him you were coming.</p> <p>10 Do you see that?</p> <p>11 A Yes.</p> <p>12 Q Does that refresh your recollection as to</p> <p>13 whether there were times when Johnny was passed</p> <p>14 out or asleep but you still tried to communicate</p> <p>15 things to him?</p> <p>16 MS. VASQUEZ: Objection; misstates prior</p> <p>17 testimony, asked and answered, assumes facts,</p> <p>18 compound, vague and ambiguous.</p> <p>19 THE WITNESS: It doesn't really -- in</p> <p>20 answer directly to your question, it doesn't</p> <p>21 really refresh. I mean, just reading the text, it</p> <p>22 just reads what it says, he's asleep on the couch</p>	<p style="text-align: right;">84</p> <p>1 BY MR. ROTTENBORN:</p> <p>2 Q So if you were conveying information to</p> <p>3 someone, then it wouldn't be because they are</p> <p>4 asleep; they would be in some form of</p> <p>5 consciousness for you to try to convey information</p> <p>6 to them, right?</p> <p>7 MS. VASQUEZ: Objection; asked and</p> <p>8 answered, assumes facts, relevance.</p> <p>9 THE WITNESS: Sorry, Ben. Can you repeat</p> <p>10 the question?</p> <p>11 BY MR. ROTTENBORN:</p> <p>12 Q I'll ask a different question.</p> <p>13 It was not uncommon for Johnny to be</p> <p>14 passed out in drunken- or drug-induced stupors,</p> <p>15 was it?</p> <p>16 MS. VASQUEZ: Objection; vague as to time,</p> <p>17 calls for speculation, assumes facts, compound,</p> <p>18 lack of foundation.</p> <p>19 THE WITNESS: I'd say it was uncommon,</p> <p>20 yes.</p> <p>21 BY MR. ROTTENBORN:</p> <p>22 Q But it did happen from time to time,</p>



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1 correct?  
2 MS. VASQUEZ: Same objections, calls for  
3 speculation.  
4 THE WITNESS: Yeah. I mean, on very rare  
5 occurrence. But right now, I can't recall any  
6 specific times apart from the one I referred to in  
7 2011.  
8 MR. ROTTENBORN: Catherine, can we pull up  
9 ALH 17968 and -69, please.  
10 THE TECHNICIAN SPECIALIST: Standby,  
11 Counsel. One moment.  
12 Exhibit 9.  
13 (Exhibit No. 9 was marked for  
14 identification.)  
15 MR. ROTTENBORN: Thank you.  
16 BY MR. ROTTENBORN:  
17 Q You see at the top your name and  
18 Ms. Heard's name listed in this series of text  
19 messages from on or around January 18th, 2015?  
20 MS. VASQUEZ: Objection; misstates the  
21 document, assumes facts.  
22 THE WITNESS: I see her name, there's my

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1 name, and I see a date on the document, yeah.  
2 BY MR. ROTTENBORN:  
3 Q Were there times when you were around and  
4 in the presence of Mr. Depp when either you or  
5 other people expressed concerns to him about his  
6 drug or alcohol use?  
7 MS. VASQUEZ: Objection; calls for  
8 hearsay, assumes facts, compound, lack of  
9 foundation, vague.  
10 THE WITNESS: Yes, there were  
11 conversations that occurred on occasion, yeah,  
12 with regard to that.  
13 BY MR. ROTTENBORN:  
14 Q And that's because you were concerned  
15 about the effects the drug and alcohol were having  
16 on Mr. Depp and his life, correct?  
17 MS. VASQUEZ: Objection; misstates prior  
18 testimony, hearsay, calls for speculation.  
19 THE WITNESS: It was more, I would say,  
20 just -- yeah, just concern for his general  
21 well-being and, yeah, and health. But, again, I'm  
22 not a doctor, not specific. I'm just, you know, a

87  
1 worker. And, yeah, so on occasion it was  
2 certainly broached, yeah.  
3 BY MR. ROTTENBORN:  
4 Q What specific conversations can you  
5 remember?  
6 MS. VASQUEZ: Objection; vague, assumes  
7 facts, and calls for hearsay.  
8 THE WITNESS: I don't remember specific  
9 conversations. I just recall that it did come up  
10 once or twice. A specific -- no. I mean, off the  
11 top of my head, I can't remember the details of  
12 specific conversations, I'm afraid.  
13 BY MR. ROTTENBORN:  
14 Q Do you remember when they took place?  
15 **A I remember, again, one way back in 2000 --**  
16 **gosh, 2000 -- 2010, was it? 2011? 2010 or 2011,**  
17 **I'm forgetting which, and that led to an extended**  
18 **period of sobriety. And then there may have been**  
19 **something in 2014, but I don't think I was**  
20 **involved in that and certainly not for a long**  
21 **time, so there's nothing that's come out recent.**  
22 **So maybe 2014 is the last time I recall anything**

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1 **being broached.**  
2 MR. ROTTENBORN: Can you scroll down to  
3 the end of this -- the end of the next page,  
4 please. And maybe just blow up that last text.  
5 BY MR. ROTTENBORN:  
6 Q So in this text, you write to Ms. Heard,  
7 he really pulled himself together today. He could  
8 tell we were all a bit worried. And Debbie spoke  
9 to him directly, but he made the effort and came  
10 around and was very good for the rest of the day  
11 and remains lucid this evening. I know he's  
12 excited to be reunited.  
13 Do you see that?  
14 **A Yes.**  
15 Q Do you know who Debbie is referring to  
16 there? Is it Debbie Lloyd?  
17 **A There's an assistant called Debbie as**  
18 **well. Yeah, I don't know.**  
19 **What was the date on this?**  
20 Q January 18th, 2015.  
21 **A I don't recall specifically, no.**  
22 Q Do you -- when you say, he could tell we



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1 were all a bit worried, what were you a bit  
2 worried about?  
3 **A I -- yeah, I couldn't tell you**  
4 **specifically looking back at that. I don't know**  
5 **because I don't know what the context is. I don't**  
6 **quite know what we were doing, where we were off**  
7 **the top of my head. I don't know what I was**  
8 **worried about. Maybe it was late or something. I**  
9 **don't know.**  
10 Q You also say, he remains lucid this  
11 evening, correct? Do you see that?  
12 **A Yeah.**  
13 Q Most human beings remain lucid during  
14 their waking hours, right?  
15 MS. VASQUEZ: Objection; calls for gross  
16 speculation, assumes facts.  
17 THE WITNESS: Yeah, lucid is a -- yeah,  
18 lucid can mean many things.  
19 Yeah, what was the question, Ben? Do most  
20 people remain lucid for --  
21 BY MR. ROTTENBORN:  
22 Q Most people remain lucid during their

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1 waking hours, right?  
2 **A Questionable, but perhaps.**  
3 Q To some degree.  
4 You seem to -- I guess my question is you  
5 seem to -- it seems to be notable to you that  
6 Johnny remained lucid that evening.  
7 And my question to you is, is that because  
8 oftentimes he was not lucid in the evenings?  
9 MS. VASQUEZ: Objection; assumes facts,  
10 calls for speculation, vague and ambiguous.  
11 THE WITNESS: I may have just used it  
12 in the -- again, I'm speculating on myself, so I  
13 don't know. It could have just been, you know,  
14 just as a good evening. I don't know.  
15 BY MR. ROTTENBORN:  
16 Q Did you ever -- were you ever present for  
17 meetings that Dr. Kipper or his staff had with  
18 Johnny about his drug or alcohol abuse?  
19 MS. VASQUEZ: Objection; assumes facts,  
20 calls for hearsay.  
21 THE WITNESS: To the best of my knowledge,  
22 they weren't meetings I was directly involved in.

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1 BY MR. ROTTENBORN:  
2 Q Were you ever present for -- I'm sorry.  
3 Go ahead, I interrupted you.  
4 **A Sorry. I forgot my train of thought.**  
5 **Please go on.**  
6 Q Were you ever present for any such  
7 meetings?  
8 **A I may have helped facilitate the meetings.**  
9 **I'm sure I did. But present, I would, again,**  
10 **speculate. But I'm not a doctor. I probably**  
11 **wouldn't have been invited, so I don't think I**  
12 **would have been directly present for any private**  
13 **conversations in there.**  
14 Q Do you remember taking a flight from  
15 Boston to Los Angeles with Mr. Depp and Ms. Heard  
16 and others on May 24th, 2014?  
17 **A Sorry. The date again, Ben?**  
18 Q May 24th, 2014.  
19 **A Right, yes.**  
20 MR. ROTTENBORN: Catherine, you can take  
21 that exhibit down, please. Thank you.  
22 BY MR. ROTTENBORN:

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1 Q That was a fairly memorable flight,  
2 correct?  
3 MS. VASQUEZ: Objection; vague.  
4 THE WITNESS: Memorable.  
5 BY MR. ROTTENBORN:  
6 Q You do remember being on that flight?  
7 MS. VASQUEZ: Objection; asked and  
8 answered.  
9 THE WITNESS: Yes.  
10 BY MR. ROTTENBORN:  
11 Q And do you remember Mr. Depp -- let's say,  
12 can we agree, Mr. Depp was not his best self on  
13 that plane?  
14 MS. VASQUEZ: Objection; vague, ambiguous,  
15 assumes facts.  
16 THE WITNESS: Yeah, best self, yeah, I'm  
17 not quite sure what you mean there, Ben, so --  
18 BY MR. ROTTENBORN:  
19 Q Were you with him -- were you with him  
20 when he arrived at the plane in Boston that day?  
21 **A I don't think so, no, no, I wasn't. I**  
22 **think, if I remember correctly, I believe I met**

93  
1 **him on the plane. I wasn't with him traveling to**  
2 **the plane, my best recollection, no.**  
3 Q And Mr. Depp was under the influence of  
4 something when he boarded the plane that day,  
5 right, to your understanding and observation?  
6 MS. VASQUEZ: Objection; calls for  
7 speculation.  
8 THE WITNESS: Yes, because I wasn't with  
9 him beforehand. So, yes, so I couldn't say -- I  
10 couldn't say that he was or wasn't categorically,  
11 no.  
12 BY MR. ROTTENBORN:  
13 Q Well, over the course of -- you've worked  
14 with him for 18 years, so you generally have an  
15 idea when he's been -- when he's under the  
16 influence of some sort of drugs or alcohol,  
17 correct?  
18 MS. VASQUEZ: Objection; compound, calls  
19 for speculation, vague and ambiguous.  
20 THE WITNESS: I mean, I supposed that  
21 could go for anyone if they are acting out of the  
22 ordinary, I suppose.

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1 BY MR. ROTTENBORN:  
2 Q Was he acting normal when he boarded the  
3 plane that day?  
4 MS. VASQUEZ: Objection; vague and  
5 ambiguous.  
6 THE WITNESS: I recall -- again, to the  
7 best of my knowledge, I recall him sort of acting  
8 in a very insular fashion that day. I do recall  
9 that.  
10 BY MR. ROTTENBORN:  
11 Q What do you mean by "insular"?  
12 **A Very quiet, very closed off.**  
13 Q Quiet and closed off is how you would  
14 describe him that day?  
15 **A Uh-huh.**  
16 Q Do you have any personal knowledge of  
17 what, if any, drugs or alcohol he had consumed  
18 before he boarded the plane?  
19 MS. VASQUEZ: Objection; asked and  
20 answered, calls for speculation.  
21 THE WITNESS: I don't have any personal  
22 knowledge, no.

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1 BY MR. ROTTENBORN:  
2 Q Now, when he was on the plane, he drank  
3 champagne, correct?  
4 MS. VASQUEZ: Objection; calls for  
5 speculation, assumes facts.  
6 BY MR. ROTTENBORN:  
7 Q Did you see him drink any champagne on the  
8 plane?  
9 **A I perhaps remember a glass on the table,**  
10 **at best, but it's a push. But, yes, I could say I**  
11 **do think I remember a glass on the table. I can**  
12 **say that, yeah.**  
13 Q Do you recall -- is it your testimony that  
14 you think he had just one glass of champagne on  
15 the plane?  
16 MS. VASQUEZ: Objection; misstates the  
17 prior testimony.  
18 THE WITNESS: It could have been a couple  
19 of glasses. I genuinely don't recall. I don't  
20 recall the specifics. I think I heard someone say  
21 two bottles somewhere, but I don't know.  
22 BY MR. ROTTENBORN:

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1 Q Do you -- and there's been a lot of  
2 evidence about this flight, but do you  
3 personally -- do you recall him drinking two  
4 bottles of champagne on that flight?  
5 **A I do not recall him drinking two bottles**  
6 **on the flight, no.**  
7 Q Do you recall him drinking any other  
8 alcohol on that flight?  
9 **A No, not to the best of my knowledge. At**  
10 **this point, I don't recall any other alcohol.**  
11 Q Do you -- did you observe him taking any  
12 drugs on that flight?  
13 **A No.**  
14 MS. VASQUEZ: Objection; vague.  
15 BY MR. ROTTENBORN:  
16 Q Where was he seated on the plane in  
17 relation to you? Just give me a layout of kind  
18 of, you know, who was seated where if you can.  
19 MS. VASQUEZ: Objection; vague as to time.  
20 THE WITNESS: Do I do it with my fingers?  
21 BY MR. ROTTENBORN:  
22 Q Sure. Just describe for me as best you



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1 can.  
2 Was this -- this was a private jet; is  
3 that right?  
4 **A Yeah. All right. So you got the pilot**  
5 **here and then galley. And then as you come into**  
6 **the plane, we had Jerry Judge, Johnny's former**  
7 **security, on the left seat. I was on the right**  
8 **seat. I'm pretty sure this seat in front of Jerry**  
9 **was empty. In front of me was Keenan Wyatt. And**  
10 **then you got a little break. And then you come to**  
11 **sort of a table towards the left. And you had**  
12 **Johnny, I remember, in the corner against the**  
13 **window. And then sat next to him was Amber in**  
14 **front of the table.**  
15 **So that day, we were -- we weren't like**  
16 **close, but we were across the way. They were --**  
17 **we were facing each other.**  
18 **Q Okay. So you were facing each other with**  
19 **at least one set of seats between you --**  
20 **A Yes.**  
21 **Q -- is that right?**  
22 **A Two actually and a space beyond that,**

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1 **yeah.**  
2 **Q Okay. Okay. So fair to say over the**  
3 **noise of the airplane, you wouldn't have heard --**  
4 **or did you hear -- actually we'll get to that in a**  
5 **second.**  
6 **I assume you've been on a number of these**  
7 **private jets during your time with Johnny, right?**  
8 **A Yes.**  
9 **Q And do the seats -- are they fixed in one**  
10 **place or do they sort of swivel like airplane**  
11 **seats do in private jets?**  
12 **MS. VASQUEZ: Objection; vague as to**  
13 **flight.**  
14 **BY MR. ROTTENBORN:**  
15 **Q Are you familiar with what I'm talking**  
16 **about how oftentimes private jet seats will sort**  
17 **of swivel out into the aisle a little bit or on an**  
18 **angle?**  
19 **A Some do --**  
20 **MS. VASQUEZ: Objection.**  
21 **THE WITNESS: -- some don't. Depends --**  
22 **in my experience, depends where they are on the**

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1 plane. Like, for example, if they are by a table,  
2 they are bolted. If they are (indiscernible) the  
3 table, they might move.  
4 **BY MR. ROTTENBORN:**  
5 **Q Do you recall whether the seats on this**  
6 **plane swiveled or not?**  
7 **A Well, the seats at the table would not**  
8 **have swiveled. The seat that I sat on would**  
9 **likely have swiveled, but I'm speculating a bit**  
10 **there. I don't know for sure. But in my**  
11 **experience, it probably would have.**  
12 **Q Yeah, well, I'm sure you have more private**  
13 **jet experience than I do, but did you sit at any**  
14 **of the seats on the table, by the table on this**  
15 **flight?**  
16 **A No, I don't think so.**  
17 **Q So you can't be sure that they didn't**  
18 **swivel, correct?**  
19 **A I didn't sit on them, so, no, I can't be**  
20 **sure in that respect. Just in my experience, the**  
21 **seats at tables do not swivel.**  
22 **Q Now, walk me through Johnny's general**

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1 demeanor over the course of the flight that you  
2 observed personally.  
3 **A Like I say, I recall him being very**  
4 **insular, very closed off in that respect. I**  
5 **remember him taking his seat and really not moving**  
6 **from it being in that corner sort of against the**  
7 **window. Pretty sure he had glasses on, maybe even**  
8 **a hat. I remember him, he was -- as he always**  
9 **does -- sorry, excuse me. He always has like a**  
10 **little stack of notebooks, a bunch of pens. And I**  
11 **just remember a lot of writing and reading and**  
12 **drawing and scribbling and such. That's what I**  
13 **recall. I always sort of sat with my -- you know,**  
14 **planes are loud, and I always sat there with my**  
15 **headphones on and just doing my thing, but that's**  
16 **what I recall from him.**  
17 **Q Did you -- do you recall engaging in any**  
18 **conversation with Johnny once the flight took off?**  
19 **You personally --**  
20 **MS. VASQUEZ: Objection; vague.**  
21 **BY MR. ROTTENBORN:**  
22 **Q -- or were you too far away to have a**



<p style="text-align: right;">101</p> <p>1 conversation with him? 2 <b>A Yeah, in those kind of seats with the</b> 3 <b>loudness and the headphones, so I wouldn't -- no,</b> 4 <b>you wouldn't talk from those positions.</b> 5 Q Okay. In part because of the noise of the 6 plane? 7 <b>A Yeah.</b> 8 Q Did -- describe the interactions between 9 Amber and Johnny on that flight. 10 MS. VASQUEZ: Objection; vague and 11 ambiguous. 12 THE WITNESS: I remember her being quite 13 aggressive towards him. I remember him in that 14 position and -- it's me speculating, but he didn't 15 move from that position, and she appeared to get 16 more -- what's the word I'm looking for here -- 17 full of gestures, those three words. She was -- 18 yeah, I remember that. I remember witnessing 19 that. 20 BY MR. ROTTENBORN: 21 Q What do you mean by her being more 22 aggressive? Just gesturing at him?</p>	<p style="text-align: right;">103</p> <p>1 MS. VASQUEZ: Objection; vague. 2 THE WITNESS: Without being able to hear 3 the words, it looked like it was a heightened 4 conversation. 5 BY MR. ROTTENBORN: 6 Q Okay. And -- 7 <b>A It was one-sided though, I should say.</b> 8 Q What do you mean by that? 9 <b>A Well, only one person was talking that I</b> 10 <b>could tell.</b> 11 Q And that was Amber? 12 <b>A Yeah, but I could see the visual.</b> 13 Q And that was Amber? 14 <b>A Yes.</b> 15 Q Now, at some point Johnny kicked Amber in 16 the back or -- 17 MS. VASQUEZ: Objection -- 18 BY MR. ROTTENBORN: 19 Q -- on her bottom, right? 20 MS. VASQUEZ: Objection; assumes facts, 21 lack of foundation, and vague. 22 THE WITNESS: It's what I would refer to</p>
<p style="text-align: right;">102</p> <p>1 <b>A Gesturing at him. She was certainly -- I</b> 2 <b>mean, again, because of the noise, headphones, I</b> 3 <b>could not hear the words, but I could see that she</b> 4 <b>was talking to him.</b> 5 Q You didn't see her hit him or be violent 6 toward him physically, right? 7 <b>A I did not see anything --</b> 8 MS. VASQUEZ: Objection. 9 BY MR. ROTTENBORN: 10 Q And over the course of their relationship, 11 you never observed Ms. Heard being physically 12 violent to Mr. Depp, correct? 13 MS. VASQUEZ: Objection; vague and 14 ambiguous. 15 BY MR. ROTTENBORN: 16 Q You can answer. 17 <b>A I never saw her hit him, no. I never --</b> 18 Q And she never told you that she had been 19 physically violent to Mr. Depp, correct? 20 <b>A We didn't have that conversation, no.</b> 21 Q So getting back to the plane flight, is it 22 fair to say it appeared they were in an argument?</p>	<p style="text-align: right;">104</p> <p>1 as a cheeky, playful tap. 2 BY MR. ROTTENBORN: 3 Q So he gave her what you refer to as a 4 cheeky, playful tap? 5 <b>A Yes. But where it connected, I don't</b> 6 <b>know.</b> 7 Q Did you see this cheeky, playful tap? 8 <b>A Mr. Wyatt's head would have been directly</b> 9 <b>in front of me. So if there was any connection,</b> 10 <b>that was kind of obscuring, but I remember the</b> 11 <b>attempt at a cheeky, playful tap.</b> 12 Q Did you witness that attempt? 13 <b>A Yes.</b> 14 Q And then what happened? 15 MS. VASQUEZ: Objection; vague. 16 THE WITNESS: As she took a great offense 17 to the tap. And I think her -- she stood up -- 18 no. She was stood up at that point. She was 19 already stood up. And I think her hands went in 20 the air, and she was much more physical with her 21 hands at that point, admonishing Johnny. 22 BY MR. ROTTENBORN:</p>



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1 Q Not touching him? When you say "physical  
2 with her hands," just gesturing more?  
3 A Correct, not touching. Myself and Jerry  
4 stood up because obviously, you know, there was  
5 something to tend to to figure out what it was.  
6 And Jerry -- Jerry pulled Amber aside, and I think  
7 at that point Johnny did move from his chair. And  
8 we went down -- if you carry on from where that  
9 table was, like a little galley and then there's a  
10 bathroom, and then you went toward the bathroom,  
11 and I remember sort of just asking him, what's up?  
12 What's going on? And I don't recall him wanting  
13 to talk much. I don't think we had much of a  
14 conversation. And then he went into the bathroom.  
15 Q And one of the reasons you didn't have  
16 much of a conversation is because he was -- he was  
17 heavily intoxicated on something at that point,  
18 right?  
19 MS. VASQUEZ: Objection; calls for  
20 speculation, assumes facts, lack of foundation,  
21 hearsay.  
22 THE WITNESS: I go back to my previous

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1 answer; he did seem very closed off, very quiet.  
2 I recall that specifically. And I don't -- I  
3 mean, yeah, he wasn't talking much that I could  
4 see. I mean, even though, again, you can't hear  
5 but you can see when someone is talking, I don't  
6 remember him talking much.  
7 BY MR. ROTTENBORN:  
8 Q Was he screaming obscenities?  
9 A I don't recall that, no.  
10 Q Did you see Ms. Heard -- you didn't see  
11 her do any drugs on the plane, right?  
12 MS. VASQUEZ: Objection; vague.  
13 THE WITNESS: No, I don't recall. I don't  
14 recall any drugs on the plane.  
15 BY MR. ROTTENBORN:  
16 Q Did you see her have any alcohol on the  
17 plane?  
18 MS. VASQUEZ: Objection; calls for  
19 speculation.  
20 THE WITNESS: If Johnny was having a  
21 glass, then she was probably having a glass, too,  
22 but --

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1 BY MR. ROTTENBORN:  
2 Q But that's not something you personally  
3 have knowledge of?  
4 A No.  
5 Q So at some point he went into the bathroom  
6 and you went and tried to communicate with him,  
7 but you said he wasn't very communicative; is that  
8 right?  
9 MS. VASQUEZ: Objection; misstates the  
10 prior testimony, compound, calls for hearsay.  
11 THE WITNESS: I recall, to the best of my  
12 knowledge, him, yeah, just not wanting to have  
13 conversation. I couldn't say beyond that at this  
14 point.  
15 BY MR. ROTTENBORN:  
16 Q Who else -- so we've established a pilot  
17 obviously was flying the plane. You were on the  
18 plane, Keenan Wyatt was on the plane.  
19 And who is Keenan Wyatt?  
20 A I'm sorry?  
21 Q Who is Keenan Wyatt, just for the record?  
22 A Keenan Wyatt was a -- he's a sound

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1 technician.  
2 Q Employed by Johnny, right?  
3 MS. VASQUEZ: Objection; calls for  
4 speculation, assumes facts.  
5 THE WITNESS: No. Technically he's  
6 employed by whatever production or film we may  
7 have been on. But he had worked with Johnny on  
8 many of films, so he was part of the team.  
9 BY MR. ROTTENBORN:  
10 Q Okay. Jerry Judge, Amber, Johnny.  
11 Was there anyone else that you can recall  
12 on the flight?  
13 A I don't recall. I don't remember if  
14 Heard's assistant Savannah McMillen was on the  
15 flight, but I genuinely can't recall honestly if  
16 she was on the plane or not.  
17 Q I'm going to -- we're going to listen to a  
18 recording that I know you listened to in the UK,  
19 and so I'll ask the court reporter to pull that  
20 up, and we'll listen to it and then I'll have some  
21 questions for you on that.  
22 MR. ROTTENBORN: Can you, please, pull up



109  
1 the recording titled, Boston plane incident,  
2 May 24th, 2014.  
3 THE TECHNICIAN SPECIALIST: Please  
4 standby.  
5 MR. ROTTENBORN: Thanks, Catherine.  
6 THE TECHNICIAN SPECIALIST: Sharing  
7 Exhibit 10.  
8 (Exhibit No. 10 was marked for  
9 identification.)  
10 (Exhibit No. 10 was played to the  
11 witness.)  
12 BY MR. ROTTENBORN:  
13 Q Mr. Deuters, would you agree that there's  
14 a lot of background noise in that recording?  
15 **A Yeah.**  
16 MR. ROTTENBORN: You can take that down,  
17 Catherine, please. Thanks.  
18 BY MR. ROTTENBORN:  
19 Q Would you agree that that noise is  
20 consistent with the noise that one hears on an  
21 airplane?  
22 MS. VASQUEZ: Objection; calls for

110  
1 speculation, vague and ambiguous.  
2 BY MR. ROTTENBORN:  
3 Q You can answer.  
4 **A Sorry. Is it similar to something you**  
5 **would hear on an airplane? Was that the question?**  
6 Q Would you agree that that background noise  
7 is consistent with the noise that one hears on an  
8 airplane?  
9 MS. VASQUEZ: Same objections, calls for  
10 speculation.  
11 THE WITNESS: I mean, it's possible.  
12 MR. ROTTENBORN: Okay. Let's pull up  
13 Exhibit 1, please. And if you can go to page 771,  
14 please, Catherine.  
15 Q And on line five, you were asked a  
16 question, would you agree that is consistent with  
17 the noise that one hears on an airplane?  
18 Line seven you answered, yes.  
19 Did I read that right?  
20 **A Yeah.**  
21 Q And would you agree that that is  
22 Mr. Depp's voice making those sounds on the

111  
1 recording, having known and worked with him for  
2 16 years?  
3 MS. VASQUEZ: Objection; improper use of a  
4 document, hearsay, calls for speculation.  
5 MR. ROTTENBORN: I'm not using any  
6 document right now; I'm just asking the witness a  
7 question.  
8 BY MR. ROTTENBORN:  
9 Q Would you agree -- I'll ask it again.  
10 Would you agree that it is Mr. Depp's  
11 voice making those sounds, having known and worked  
12 with him for 16 years?  
13 **A I mean, it could well be. I mean, it**  
14 **sounds like it, yes, but I don't -- I don't know**  
15 **for sure.**  
16 Q And did you --  
17 MR. ROTTENBORN: You can take that down,  
18 Catherine. Thanks.  
19 BY MR. ROTTENBORN:  
20 Q Did you hear on the video or -- I'm  
21 sorry -- on the audio recording someone say  
22 something to the effect of, I'm going to stay with

112  
1 this fucking idiot in case he gets sick?  
2 Did you hear that?  
3 MS. VASQUEZ: Objection; assumes facts,  
4 hearsay.  
5 THE WITNESS: Barely. My hearing is not  
6 great, but I could vaguely hear another voice at  
7 times, yes.  
8 BY MR. ROTTENBORN:  
9 Q Was that you who said that?  
10 MS. VASQUEZ: Objection; assumes facts,  
11 calls for speculation, misstates the audio.  
12 THE WITNESS: I don't think it was, no.  
13 BY MR. ROTTENBORN:  
14 Q Do you have an opinion as to who that was  
15 who said that or words to that effect?  
16 MS. VASQUEZ: Objection; hearsay, calls  
17 for speculation, assumes facts, lack of  
18 foundation.  
19 THE WITNESS: I couldn't -- I couldn't say  
20 for sure, no. But it didn't sound like my voice,  
21 no.  
22 BY MR. ROTTENBORN:



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1 Q Now, was Johnny unconscious at all for any  
2 part of that flight?  
3 MS. VASQUEZ: Objection; vague and  
4 ambiguous, calls for speculation.  
5 THE WITNESS: Not that I recall. I  
6 recall, as I mentioned before, going to the back  
7 of the plane, him not wanting to talk much and  
8 going to the bathroom, and then returning to my  
9 seat, headphones back on, landing.  
10 BY MR. ROTTENBORN:  
11 Q And on or about the next day, you had a  
12 conversation with him about the events on that  
13 flight, right?  
14 MS. VASQUEZ: Objection; assumes facts,  
15 calls for hearsay, vague and ambiguous, lack of  
16 foundation.  
17 THE WITNESS: I mean, there wasn't really  
18 anything to discuss, yeah.  
19 BY MR. ROTTENBORN:  
20 Q Did you have a conversation with Johnny  
21 about that plane flight?  
22 MS. VASQUEZ: Same objections, asked and

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1 answered.  
2 BY MR. ROTTENBORN:  
3 Q You can answer.  
4 **A So I'm lost on the question. Where are we**  
5 **at now?**  
6 Q Did you have a conversation with Johnny  
7 the following day about that plane flight?  
8 MS. VASQUEZ: Vague and ambiguous,  
9 hearsay, assumes facts, lack of foundation, asked  
10 and answered.  
11 THE WITNESS: To the best of my knowledge,  
12 I can't recall the conversation, but obviously I  
13 know the text you're referring to, and I recall  
14 wanting to mollify him wanting to placate and  
15 smooth things over with, you know, whatever didn't  
16 occur.  
17 BY MR. ROTTENBORN:  
18 Q And we'll get to those texts, the texts  
19 with Amber.  
20 I'm asking about did you have a  
21 conversation with Johnny in which he had forgotten  
22 parts of what happened on that plane flight?

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1 MS. VASQUEZ: Objection; assumes facts,  
2 calls for speculation, vague and ambiguous,  
3 hearsay.  
4 THE WITNESS: I don't -- I don't recall a  
5 specific conversation about what had not happened  
6 on the plane, no.  
7 BY MR. ROTTENBORN:  
8 Q Johnny conveyed to you that he had  
9 forgotten swathes of what happened on that plane  
10 flight, right?  
11 MS. VASQUEZ: Objection; assumes facts,  
12 argumentative, hearsay, lack of foundation.  
13 THE WITNESS: Again, I can't remember  
14 specifically. I do recall the conversation  
15 regarding to placate Heard. There was that.  
16 BY MR. ROTTENBORN:  
17 Q All right. We'll get to that in a minute.  
18 MR. ROTTENBORN: But, meanwhile,  
19 Catherine, can you pull up Exhibit 1, please, and  
20 please go to page 758.  
21 BY MR. ROTTENBORN:  
22 Q And in the UK litigation, Mr. Deuters,

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1 were you asked this question and did you give this  
2 answer: Question, line eight, did he appear from  
3 what happened between you and him to have  
4 forgotten swathes of that plane journey?  
5 Answer: I mean, the conversation that we  
6 had the following day, yes, that is in accordance.  
7 The memory was not, you know, solid all the way,  
8 yes?  
9 **A Yeah.**  
10 Q And the reason that Johnny couldn't  
11 remember parts of that plane journey was because  
12 his consumption of drugs or alcohol caused him to  
13 have a blackout, right?  
14 MS. VASQUEZ: Objection; calls for  
15 speculation, assumes facts, lack of foundation,  
16 compound, vague and ambiguous.  
17 THE WITNESS: I couldn't comment on why,  
18 no.  
19 BY MR. ROTTENBORN:  
20 Q Okay. Leaving page 758 up, didn't you --  
21 weren't you asked the following question and  
22 didn't you give the following answer in the UK:

<p style="text-align: right;">117</p> <p>1 Question: Well -- there's two questions and 2 answers. 3 Line 13, question: So the memory was not 4 solid all the way through. You were saying he was 5 not unconscious at any stage? 6 Answer: No, I do not recall that. No, 7 certainly not. 8 Question: Which suggests that the 9 consumption of all of this stuff caused him to 10 have a lapse of memory or that type of blackout, 11 yes? 12 Answer: Yes. 13 Did I read that right? 14 <b>A Well, I mean, that's sort of putting words 15 in my mouth a little bit there.</b> 16 Q I'm just asking if I read that -- 17 MS. VASQUEZ: Mr. Deuters -- 18 THE WITNESS: You read it, yeah. 19 Sorry, Camille? 20 MS. VASQUEZ: Mr. Rottenborn's question 21 was did he read it right; that's the only 22 question.</p>	<p style="text-align: right;">119</p> <p>1 Q What does that mean? Help him get home? 2 MS. VASQUEZ: Objection -- 3 THE WITNESS: Yeah. 4 MS. VASQUEZ: -- misstates prior 5 testimony. 6 BY MR. ROTTENBORN: 7 Q Did -- do you recall him remaining asleep 8 in the plane after other people got off the plane? 9 MS. VASQUEZ: Objection; assumes facts, 10 lack of foundation, vague. 11 THE WITNESS: I don't -- I don't recall if 12 he was there asleep there or not at that time. 13 BY MR. ROTTENBORN: 14 Q Okay. The fact is, Mr. Deuters, when the 15 plane landed, Mr. Depp was drunk and passed out, 16 correct? 17 MS. VASQUEZ: Objection; compound, calls 18 for speculation, assumes facts, lack of 19 foundation, argumentative. 20 THE WITNESS: I genuinely don't recall if 21 that was his state or not upon landing. 22 BY MR. ROTTENBORN:</p>
<p style="text-align: right;">118</p> <p>1 THE WITNESS: All right. Yes. 2 BY MR. ROTTENBORN: 3 Q Did you -- when the plane landed in 4 Boston -- or -- I'm sorry -- in Los Angeles, did 5 you stay on the plane and stay with -- Johnny 6 remained on the plane while others got off the 7 plane, correct? 8 MS. VASQUEZ: Objection; assumes facts, 9 vague. 10 THE WITNESS: It's possible, but I don't 11 recall specifically. 12 BY MR. ROTTENBORN: 13 Q Did you stay with him until he exited the 14 plane? 15 MS. VASQUEZ: Objection; assumes facts. 16 THE WITNESS: I probably would have seen 17 him home, but, again, I couldn't say for sure. 18 BY MR. ROTTENBORN: 19 Q I'm sorry, I missed that answer. 20 You probably would have what? 21 <b>A It's likely that I would have seen him 22 home.</b></p>	<p style="text-align: right;">120</p> <p>1 Q And you claim that you had a conversation 2 with him the next day. 3 You don't recall certain parts of it, but 4 you've used the word "mollify" and "placate" a 5 couple of times. 6 So tell me what do you recall -- tell me 7 anything that you recall about any conversation 8 you had with Johnny about this plane flight or the 9 aftermath of it. 10 MS. VASQUEZ: Objection; vague and 11 ambiguous, compound, calls for hearsay, and 12 assumes facts. 13 THE WITNESS: I just -- I vaguely recall 14 that we had a conversation whereby he was keen 15 who -- I suppose smooth whatever issue there was 16 or there wasn't. And he asked me to write a text, 17 and that's what I recall. 18 BY MR. ROTTENBORN: 19 Q What did he ask you to -- you say to write 20 her a text. 21 You're referring to Amber? 22 <b>A Yes.</b></p>



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1 Q What did he ask you to write in the text?  
2 MS. VASQUEZ: Objection; calls for  
3 hearsay.  
4 THE WITNESS: I don't think --  
5 MR. ROTTENBORN: You're just making  
6 ridiculous objections, Camille, but --  
7 MS. VASQUEZ: I'm not making ridiculous  
8 objections, Ben.  
9 MR. ROTTENBORN: You are. They are  
10 entirely frivolous, and you know it.  
11 MS. VASQUEZ: And you're the judge, right?  
12 Why don't we let the judge decide if they are  
13 frivolous or not. You're asking him what somebody  
14 said; that's hearsay.  
15 MR. ROTTENBORN: The judge will decide,  
16 and we reserve all rights.  
17 MS. VASQUEZ: And I reserve all rights to  
18 state my objections on the record.  
19 BY MR. ROTTENBORN:  
20 Q Mr. Deuters, what did he ask you to write  
21 in the text?  
22 MS. VASQUEZ: Same objection.

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1 THE WITNESS: I don't believe that he was  
2 specific with his words. He said just said write  
3 whatever you think she needs to hear.  
4 BY MR. ROTTENBORN:  
5 Q What did you understand that to mean?  
6 **A As it sounds, write whatever she needs to**  
7 **hear.**  
8 Q Did Mr. Depp express any regret about any  
9 of his conduct on that flight?  
10 MS. VASQUEZ: Objection; assumes facts,  
11 calls for hearsay.  
12 THE WITNESS: I think anything that he  
13 assumed or didn't assume was from the mouth of  
14 others. I don't think -- I think he was being  
15 told -- being told things and he was responding to  
16 those things.  
17 BY MR. ROTTENBORN:  
18 Q Was he being told things by you?  
19 MS. VASQUEZ: Objection; vague.  
20 THE WITNESS: I don't recall telling  
21 him -- I don't know what I would have told him.  
22 BY MR. ROTTENBORN:

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1 Q Do you recall telling Mr. Depp anything  
2 about his conduct on the plane flight?  
3 MS. VASQUEZ: Objection; assumes facts,  
4 vague and ambiguous, asked and answered.  
5 THE WITNESS: I wouldn't have told him  
6 anything, no, because there wasn't really anything  
7 to tell.  
8 BY MR. ROTTENBORN:  
9 Q Now, as you've alluded to before, you  
10 have -- well, let me ask you this: In your  
11 capacity as personal assistant for Mr. Depp,  
12 having worked for him for a number of years, did  
13 you -- were you alarmed or disturbed by any of his  
14 conduct on that plane flight?  
15 MS. VASQUEZ: Objection; argumentative,  
16 vague, assumes facts.  
17 THE WITNESS: I was not concerned by his  
18 behavior, no.  
19 BY MR. ROTTENBORN:  
20 Q Now, at some point you had a series of  
21 text messages with Ms. Heard about the flight,  
22 correct?

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1 **A Yes.**  
2 MR. ROTTENBORN: Can you pull up the  
3 document entitled ALH 17950 to 17598.  
4 BY MR. ROTTENBORN:  
5 Q And while Catherine is doing that, you  
6 said I was not concerned by his behavior?  
7 Were you concerned by anyone's behavior on  
8 that flight?  
9 **A I was concerned by the nature of her**  
10 **behavior, yes, towards him.**  
11 Q And how so?  
12 **A Just made me uncomfortable, just showed**  
13 **there was a dynamic something was wrong.**  
14 Q And what about her behavior made you  
15 uncomfortable?  
16 **A The gesticulating, the -- her demeanor**  
17 **toward him.**  
18 Q But you didn't hear anything she said to  
19 him or he said to her, correct?  
20 **A Correct.**  
21 THE TECHNICIAN SPECIALIST: Exhibit 11.  
22 (Exhibit No. 11 was marked for

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1 identification.)  
2 MR. ROTTENBORN: Thank you.  
3 BY MR. ROTTENBORN:  
4 Q But despite not hearing anything that he  
5 said to her or she said to him, you made the  
6 judgment that her behavior was concerning; is that  
7 your testimony?  
8 **A Sorry. One more time, Ben.**  
9 Q Without hearing anything that she said to  
10 him or he said to her, your testimony is that you  
11 made the judgment that her behavior on the flight  
12 was concerning because of --  
13 **A Yes.**  
14 Q -- her gesticulating?  
15 MS. VASQUEZ: Objection; argumentative.  
16 THE WITNESS: From a physical -- yeah,  
17 from a physical view that I had, yeah, it was  
18 aggressive.  
19 BY MR. ROTTENBORN:  
20 Q This is a -- if you look at the top, this  
21 is a text message exchange between you and Amber  
22 on May 24th, 2014; do you see that?

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1 **A Yeah.**  
2 Q In the first text at the top you write,  
3 he's up in the bathroom. Moving slowly. Will let  
4 you know when en route and how he is in the car?  
5 **A Yeah.**  
6 Q Were you referring to him being in the  
7 bathroom on the plane?  
8 MS. VASQUEZ: Objection; assumes facts.  
9 THE WITNESS: I don't know. I would've  
10 thought I might have been in the house or  
11 something. I don't know which bathroom I'm  
12 referring to, sorry.  
13 BY MR. ROTTENBORN:  
14 Q And when you say "moving slowly," you  
15 meant moving slowly because he was hung over or  
16 somehow sick from drugs and alcohol or alcohol,  
17 right?  
18 MS. VASQUEZ: Objection; calls for  
19 speculation, assumes facts, misstates the  
20 document.  
21 THE WITNESS: Again, in this context,  
22 sorry, I can't confirm either way what I mean by

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1 it in that instance.  
2 BY MR. ROTTENBORN:  
3 Q Okay. Below that you write, he's in some  
4 pain, as you might guess.  
5 Do you see that?  
6 **A Yeah.**  
7 Q What did you mean when you wrote, he's in  
8 some pain?  
9 **A Again, in this context, I'd only be  
10 speculating because I can't a hundred percent say.**  
11 Q So you have no -- no testimony to offer as  
12 to what you meant by, he is in some pain?  
13 MS. VASQUEZ: Asked and answered,  
14 argumentative.  
15 BY MR. ROTTENBORN:  
16 Q Is that right?  
17 **A Yeah, in this context, I couldn't tell you  
18 either way for sure, no.**  
19 Q The two texts down -- well, one text down  
20 you write, we're on our way to 80.  
21 That's referring to 80 Sweetzer Avenue,  
22 right?

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1 **A Yes.**  
2 Q And that's one of Johnny's residences on  
3 Sweetzer?  
4 **A Yes.**  
5 Q Below that you write, he's been sick.  
6 We're going to get him straight to bed.  
7 Do you see that?  
8 **A Yes.**  
9 Q What did you mean when you said, he's been  
10 sick?  
11 **A Well, it probably reads as probably is  
12 what it is.**  
13 Q What does that mean?  
14 **A Well, it means that he was sick. But I  
15 don't -- I mean, I've written it, but I'm just  
16 referring to what's in front of me here. I don't  
17 recall it, I can't picture it.**  
18 Q Okay. Do you mean physically sick,  
19 like -- sorry. Strike that.  
20 Do you mean like the flu or he's been sick  
21 from drinking or drug use?  
22 MS. VASQUEZ: Objection; calls for



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1 speculation, asked and answered, argumentative.  
2 He's answered the question.  
3 THE WITNESS: Yeah, it would be just  
4 speculation on my behalf, sir, because I can't  
5 specifically recall him being physically sick, I  
6 can't say he was physically sick, so that I'm just  
7 guessing. I don't know.  
8 BY MR. ROTTENBORN:  
9 Q Now, you write below that, he's sound  
10 asleep. We're here looking out for him.  
11 Do you see that?  
12 **A Yeah.**  
13 Q What do you mean by, we're here looking  
14 out for him?  
15 **A I suppose in that context -- I mean, if I**  
16 **said he's been sick, then just probably, yeah, I'm**  
17 **looking out for him, just looking out for him for**  
18 **a bit.**  
19 Q Do you typically stay with Johnny after  
20 he's sound asleep?  
21 **A No.**  
22 Q So you're looking out for him there

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1 because he's sleeping off a hangover or because  
2 he's sound asleep as a result of being under the  
3 influence of drugs or alcohol, right?  
4 MS. VASQUEZ: Objection; asked and  
5 answered, argumentative, calls for speculation,  
6 assumes facts.  
7 THE WITNESS: Yeah, I'd be speculating, so  
8 I couldn't say. I couldn't say.  
9 BY MR. ROTTENBORN:  
10 Q If you go to the next page, please, the  
11 second text down, you write, hey, he's up. He's  
12 much better. Clearer. He doesn't remember much,  
13 but we took him through all that happened. He's  
14 sorry, very sorry, and just wants to get better,  
15 which allows us to make him follow up on that  
16 promise.  
17 Do you see that?  
18 **A Yeah.**  
19 Q What did you mean when you said, which  
20 allows us to make him follow up on that promise?  
21 Did you mean a promise to get better?  
22 MS. VASQUEZ: Objection; misstates the

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1 document, assumes facts.  
2 THE WITNESS: I mean, just from reading  
3 that text, I would assume, but I'm not sure  
4 exactly what I'm referring to there.  
5 BY MR. ROTTENBORN:  
6 Q You're referring to a promise by Johnny to  
7 get better in terms of his drug or alcohol use,  
8 right?  
9 MS. VASQUEZ: Objection; assumes facts,  
10 calls for speculation.  
11 THE WITNESS: Well, it's 2014. Yeah, I  
12 mean, it would be me speculating again, so I don't  
13 specifically recall because it's not clear; it's  
14 not clear enough.  
15 BY MR. ROTTENBORN:  
16 Q Okay. Below that you say, he's teary. He  
17 doesn't want to be a fuck-up anymore, his words.  
18 Did he tell you that he believed himself  
19 to be a fuck-up?  
20 MS. VASQUEZ: Objection; hearsay.  
21 THE WITNESS: I don't recall him saying  
22 that to me. Again, I'm reading it there, but I

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1 don't recall him saying those words to me, no.  
2 BY MR. ROTTENBORN:  
3 Q Okay. Would you have written them if he  
4 hadn't said those words to you?  
5 MS. VASQUEZ: Objection; argumentative,  
6 asked and answered.  
7 THE WITNESS: I think -- you know, if I  
8 ever had to -- you know, (indiscernible) to  
9 appease, then maybe I would, yeah, it's possible.  
10 BY MR. ROTTENBORN:  
11 Q Is it your testimony today -- just so I'm  
12 clear -- that Johnny didn't tell you that he  
13 doesn't want to be a fuck-up anymore?  
14 MS. VASQUEZ: Objection; misstates the  
15 prior testimony, hearsay, asked and answered.  
16 THE WITNESS: I don't recall him saying  
17 those words to me, no.  
18 BY MR. ROTTENBORN:  
19 Q Below that you say, we're going to set him  
20 up with Dr. Kipper on Wednesday hopefully. He  
21 won't be skipping it this time.  
22 Do you see that?

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1 **A Yeah.**  
2 Q Dr. Kipper was the doctor that Johnny  
3 hired to help him get off the use of certain  
4 prescription drugs, correct?  
5 MS. VASQUEZ: Objection; calls for  
6 speculation.  
7 BY MR. ROTTENBORN:  
8 Q Let me ask it differently.  
9 Dr. Kipper was the doctor that Johnny  
10 hired to help him deal with both drug and alcohol  
11 abuse, correct?  
12 MS. VASQUEZ: Objection; calls for  
13 speculation, compound.  
14 THE WITNESS: I didn't hire Dr. Kipper, so  
15 I can't comment on exactly why he was hired.  
16 BY MR. ROTTENBORN:  
17 Q Okay.  
18 **A I wasn't part of that conversation.**  
19 Q But the reason that you were telling Amber  
20 the day after the plane flight that we're going to  
21 set him up with Dr. Kipper was because you and  
22 Amber and everyone knew that Johnny had a drug and

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1 alcohol problem that he needed to deal with,  
2 right?  
3 MS. VASQUEZ: Objection; assumes facts,  
4 asked and answered, calls for speculation.  
5 THE WITNESS: Yeah. Again, I mean, I'm  
6 not a doctor so I can't comment, but Dr. Kipper  
7 was brought in to see Johnny. I can't give you  
8 details on the specifics because I don't know the  
9 specifics.  
10 BY MR. ROTTENBORN:  
11 Q You say he won't be skipping it this time.  
12 Had Johnny skipped prior meetings with  
13 Dr. Kipper?  
14 MS. VASQUEZ: Objection; calls for  
15 speculation.  
16 THE WITNESS: I don't recall off the top  
17 of my head, but obviously I see the words in front  
18 of me, so it's possible.  
19 MR. ROTTENBORN: Can you go to the next  
20 page, please.  
21 MS. VASQUEZ: Ben --  
22 MR. ROTTENBORN: Yep.

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1 MS. VASQUEZ: -- whenever you get a  
2 chance, it's 8 o'clock in the UK, past eight, so I  
3 think Mr. Deuters probably would appreciate some  
4 type of break to have some dinner.  
5 BY MR. ROTTENBORN:  
6 Q Okay. Mr. Deuters, are you okay if we go  
7 for about five to ten more minutes?  
8 **A No problem.**  
9 Q Thanks. At the top of that page you write  
10 to Amber, there feels like a sea change in him  
11 this morning. He just spoke about how bad he  
12 feels, and he wasn't talking physically.  
13 Do you see that?  
14 **A Yep.**  
15 Q What did he tell you about how bad he  
16 feels?  
17 MS. VASQUEZ: Objection; calls for  
18 speculation, assumes facts, hearsay.  
19 THE WITNESS: I don't recall. I mean, I  
20 don't recall. This all reads like me just trying  
21 to smooth the air with her, so she's not going to  
22 be -- you know, behave like she behaves; that's

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1 what it looks like to me.  
2 BY MR. ROTTENBORN:  
3 Q What do you mean behave like she behaves?  
4 **A Well, for example, on the plane and, you  
5 know, arguments and aggressive and for reasons I  
6 don't understand or know. Appeasement and  
7 placating was a common theme.**  
8 Q Is it your -- and just so I'm clear, is it  
9 your testimony Johnny didn't tell you that he felt  
10 bad for anything that happened on the plane or for  
11 any other reason?  
12 MS. VASQUEZ: Objection; hearsay,  
13 misstates prior testimony.  
14 THE WITNESS: I do not recall him telling  
15 me that he felt bad, no, I don't.  
16 BY MR. ROTTENBORN:  
17 Q When you say below that, he's incredibly  
18 apologetic and knows that he has done wrong, what  
19 was he apologetic about?  
20 MS. VASQUEZ: Objection; assumes facts,  
21 hearsay.  
22 BY MR. ROTTENBORN:



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1 Q Or was that just something else that you  
2 were saying to placate Amber?  
3 **A Yeah, I felt like if I had known, I might**  
4 **have said something for what it is. But I don't**  
5 **ever say what it is because we don't know what it**  
6 **is.**  
7 Q Do you think -- do you -- did he express  
8 to you at any point that he knew that he had done  
9 wrong on that plane?  
10 MS. VASQUEZ: Objection; hearsay, assumes  
11 facts, vague.  
12 THE WITNESS: No, not that I recall. To  
13 the best of my knowledge, no.  
14 BY MR. ROTTENBORN:  
15 Q When you say, feels like we're at a  
16 critical juncture below that, what did you mean?  
17 **A I don't know. Seems out of context. I**  
18 **don't know.**  
19 **Is that part of that same text thread?**  
20 Q Yeah.  
21 **A Don't know. Don't know what that's**  
22 **referring to.**

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1 MR. ROTTENBORN: Okay. Can we go to the  
2 next page, please. Actually, let's go to the  
3 bottom of the previous page.  
4 BY MR. ROTTENBORN:  
5 Q On ALH 17954 Ms. Heard writes, look, he  
6 thinks he doesn't deserve this. Obviously he has  
7 no idea what he did or to the extent that he did  
8 it. If someone was truly honest with him about  
9 how bad it really was, he'd be appalled. The man  
10 Johnny is would be humiliated and definitely  
11 wouldn't say to me that he doesn't deserve it.  
12 I'm sad that he doesn't have a better way to  
13 really know the severity of his actions yesterday.  
14 Unfortunately for me, I remember in full detail  
15 everything that happened.  
16 Do you see that?  
17 **A Yeah.**  
18 Q And then below that you write, it was  
19 disgusting, and he knows it. He was appalled.  
20 When I told him he kicked you, he cried.  
21 Those are your words, right?  
22 MS. VASQUEZ: Objection; argumentative.

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1 BY MR. ROTTENBORN:  
2 Q Did you tell Johnny that he had kicked  
3 Amber? And did he cry?  
4 MS. VASQUEZ: Objection.  
5 BY MR. ROTTENBORN:  
6 Q You're going to testify that he didn't,  
7 right?  
8 MS. VASQUEZ: Ben, are there three  
9 questions there? Which one would you like him to  
10 answer?  
11 BY MR. ROTTENBORN:  
12 Q Go ahead, Mr. Deuters.  
13 MS. VASQUEZ: Argumentative.  
14 Mr. Deuters, I don't even know if you  
15 understand one of the three questions --  
16 MR. ROTTENBORN: No speaking objections,  
17 Camille. Cut it out.  
18 MS. VASQUEZ: Okay. How about you ask a  
19 proper question then.  
20 That's argumentative, Mr. Deuters.  
21 MR. ROTTENBORN: That's cross-examination,  
22 Camille. It's allowed to be argumentative.

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1 BY MR. ROTTENBORN:  
2 Q Mr. Deuters --  
3 MS. VASQUEZ: You're not allowed to harass  
4 the witness, Mr. Rottenborn.  
5 MR. ROTTENBORN: I'm not harassing anyone.  
6 MS. VASQUEZ: Yes, you are. You have  
7 three questions pending.  
8 BY MR. ROTTENBORN:  
9 Q Let's do it this way, Mr. Deuters. Did  
10 you tell -- you didn't tell Mr. Depp -- well,  
11 let's -- did Mr. Depp cry when you told him he  
12 kicked Amber?  
13 MS. VASQUEZ: Objection; assumes facts not  
14 in evidence, hearsay.  
15 THE WITNESS: Not to the best of my  
16 knowledge, no.  
17 BY MR. ROTTENBORN:  
18 Q And I suppose your testimony today is  
19 going to be that you didn't actually tell him he  
20 kicked Amber; is that right?  
21 MS. VASQUEZ: Objection; argumentative.  
22 THE WITNESS: Sorry. Can you rephrase the



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1 question, Ben.  
2 BY MR. ROTTENBORN:  
3 Q Did you tell Mr. Depp that he kicked  
4 Amber?  
5 **A Not that I recall.**  
6 Q Is it possible you did?  
7 **A It was -- it was a word that she was**  
8 **using.**  
9 Q And I'll give you as long as you want.  
10 You can go through this text chain. And the only  
11 time the word "kicked" is used, I believe, is by  
12 you there.  
13 So what do you mean it was a word she was  
14 using? That's your word, your text, right?  
15 **A That was in response to her on the plane.**  
16 Q Well, because Mr. Depp had kicked her,  
17 right?  
18 MS. VASQUEZ: Objection; argumentative,  
19 asked and answered, assumes facts, misstates prior  
20 testimony.  
21 THE WITNESS: No. That was in response to  
22 the attempted tap.

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1 BY MR. ROTTENBORN:  
2 Q What you referred to earlier as a cheeky,  
3 playful tap; is that right?  
4 MS. VASQUEZ: Objection; misstates prior  
5 testimony.  
6 THE WITNESS: Yes.  
7 BY MR. ROTTENBORN:  
8 Q What did you mean when you said it was  
9 disgusting?  
10 **A I don't know. It's a strange word for me**  
11 **to use.**  
12 Q You were referring to Johnny's conduct on  
13 that airplane, right?  
14 MS. VASQUEZ: Objection; argumentative,  
15 assumes facts, vague.  
16 THE WITNESS: No. I think it was just a  
17 term used to -- again, it was all appeasement and  
18 all about placation.  
19 BY MR. ROTTENBORN:  
20 Q All about appeasement and placation,  
21 that's your testimony?  
22 MS. VASQUEZ: Asked and answered,

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1 argumentative.  
2 THE WITNESS: Yes.  
3 BY MR. ROTTENBORN:  
4 Q So it wasn't about the truth of what  
5 happened on that airplane; is that your testimony?  
6 MS. VASQUEZ: Objection; argumentative.  
7 THE WITNESS: It was about the truth of  
8 what happened on the airplane.  
9 BY MR. ROTTENBORN:  
10 Q You just testified it was about  
11 appeasement and placation?  
12 MS. VASQUEZ: Objection; argumentative,  
13 unintelligible.  
14 BY MR. ROTTENBORN:  
15 Q The conduct that Mr. Depp exhibited on  
16 that airplane was disgusting to you as you wrote  
17 in that text to Ms. Heard on May 25th, 2014,  
18 correct?  
19 MS. VASQUEZ: Objection; asked and  
20 answered, assumes facts --  
21 THE WITNESS: No.  
22 MS. VASQUEZ: -- misstates prior

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1 testimony.  
2 BY MR. ROTTENBORN:  
3 Q And your testimony today is that the only  
4 reason you used word "kicked" is because you had  
5 heard Amber use that word and you were just trying  
6 to appease or placate her; is that right?  
7 **A Yes.**  
8 MS. VASQUEZ: Objection; misstates prior  
9 testimony.  
10 BY MR. ROTTENBORN:  
11 Q Now, she says below, he's done this many  
12 times before. Tokyo, the island, London; remember  
13 that? And I always stay. Always believe he's  
14 going to get better. And then every three or so  
15 months I'm in the exact same position.  
16 And you write, I know. It's hideous.  
17 Do you see that?  
18 **A Yeah.**  
19 Q What was hideous that you were referring  
20 to?  
21 **A I have absolutely no idea.**  
22 Q Above that you say, he's a lost little boy



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1 and needs all the help he can get. He is so very  
2 sorry, as he should be.  
3 Do you see that?  
4 **A Yeah.**  
5 Q What did you mean by those statements?  
6 **A I don't -- I don't know what this is. He**  
7 **read it to me and says it's the wrong text I sent.**  
8 **I don't know what that is.**  
9 **Yeah, I don't know. I don't know, Ben. I**  
10 **can't recall. I can't recall what they**  
11 **specifically refer to. I don't recall the**  
12 **incident in question.**  
13 MR. ROTTENBORN: Can you, please, go to  
14 the bottom of ALH 17957.  
15 BY MR. ROTTENBORN:  
16 Q Amber says at the second-to-last text from  
17 the bottom, if he makes some steps to truly change  
18 this time. He needs to do more than just one  
19 doctor appointment. And if he does seem like he  
20 wants to change things, he'll know where to find  
21 me.  
22 And he writes, all understood and agreed.

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1 You wrote that to her, right, all  
2 understood and agreed?  
3 **A Yeah.**  
4 Q Did you agree with her statement that he  
5 needs to do more than just one doctor appointment?  
6 **A No. I was just agree -- I was just**  
7 **agreeing to agree. That's what that is, it's just**  
8 **consistent with the rest of the text.**  
9 Q So you didn't believe that Johnny, for  
10 example, needed to come to grips with his drug or  
11 alcohol addiction by doing something more than  
12 just going to one doctor appointment?  
13 **A I suppose I have to say not my place to**  
14 **say.**  
15 MR. ROTTENBORN: All right. I think now  
16 is probably a good time for a break if --  
17 MS. VASQUEZ: That's fine. We can go off  
18 the record.  
19 THE VIDEOGRAPHER: I'm sorry.  
20 Mr. Rottenborn, was there anything else before we  
21 go off?  
22 MR. ROTTENBORN: No, no. We can go off.

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1 THE VIDEOGRAPHER: Yes, sir. Off record  
2 3:23.  
3 (A luncheon recess was taken.)  
4 THE VIDEOGRAPHER: On record 4:10.  
5 MR. ROTTENBORN: Catherine, can you,  
6 please, pull up the document that starts with Depp  
7 18764.  
8 THE TECHNICIAN SPECIALIST: Please  
9 standby.  
10 Exhibit 12.  
11 (Exhibit No. 12 was marked for  
12 identification.)  
13 MR. ROTTENBORN: If you can just go ahead  
14 and, yeah, blow that up, please.  
15 BY MR. ROTTENBORN:  
16 Q Mr. Deuters, do you recognize this as an  
17 e-mail exchange between you and Amber on May 27th,  
18 2014?  
19 **A Well, I can obviously see the respective,**  
20 **you know, information at the top. I'm just**  
21 **reading it now.**  
22 Q Sure. It looks like there's some -- I

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1 don't know -- somehow the production of this or  
2 something led there to be some special characters  
3 in the place of certain letters, but I think that  
4 you get --  
5 **A Yeah, yeah.**  
6 Q -- the gist of it?  
7 **A Yeah, yeah. I mean, again, I don't**  
8 **recall, Ben, these e-mails.**  
9 Q Okay. Well, I'm going to ask you about  
10 the middle e-mail, an e-mail from you, the one  
11 that says on 27 May 2014, at 10:39, Stephen  
12 Deuters wrote, and you say in the end of the  
13 first, start of the second line, you say, I stayed  
14 with him -- he was very upset again last night. I  
15 stayed with him again. Important thing is that he  
16 behaved himself. These last few days have been --  
17 I assume that means trial by fire for him in that  
18 regard, okay.  
19 Do you see that?  
20 **A Yeah, I'm following you on the trial and**  
21 **there's like an equal sign or something.**  
22 Q Yeah, I don't know what the cause of that



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1 is, but we have seen a couple different versions  
2 of this document, and both of them are like that.  
3 **A Okay.**  
4 Q My question for you is, what did you mean  
5 when you said, the important thing is that he  
6 behaved himself? What did you mean by "behaved  
7 himself"?  
8 **A It would be speculation on my part. I**  
9 **couldn't tell you, Ben. I don't know specifically**  
10 **what I mean by it in that context there.**  
11 Q Okay. Is it possible that you meant lay  
12 off the drugs or alcohol?  
13 MS. VASQUEZ: Objection; assumes facts,  
14 misstates prior testimony.  
15 THE WITNESS: Yeah, that would be an  
16 assumption for me to say so. I genuinely can't  
17 recall in this particular thing. It's all a long  
18 time ago.  
19 BY MR. ROTTENBORN:  
20 Q Okay. Later in that particular e-mail,  
21 bottom of the third line on the right-hand side,  
22 you say -- well, actually let's just keep going.

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1 You say, we're giving him all the support we can.  
2 As I mentioned, the Kipper meeting was very  
3 promising. Feeling like a strong bond will be  
4 made there.  
5 What did you mean by "the Kipper meeting  
6 was very promising"?  
7 **A I wouldn't have been in the meeting, so**  
8 **I'd be speculating on that because anything that**  
9 **is private, so maybe -- yeah, again, I'm**  
10 **speculating, Ben, so I don't know. I don't know**  
11 **what that would be, apart from, you know, how it**  
12 **reads.**  
13 Q Okay. Is it possible you meant the Kipper  
14 meeting was very promising in terms of him  
15 abstaining from drugs and alcohol and being  
16 treated by Dr. Kipper?  
17 MS. VASQUEZ: Objection; assumes facts,  
18 calls for speculation, asked and answered.  
19 THE WITNESS: I think the problem is I  
20 wouldn't have been in that meeting, so anything  
21 would be hearsay.  
22 BY MR. ROTTENBORN:

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1 Q Why would you have written the Kipper  
2 meeting was very promising if you had no idea what  
3 happened in the Kipper meeting?  
4 MS. VASQUEZ: Objection; misstates prior  
5 testimony, argumentative.  
6 THE WITNESS: I think it's consistent with  
7 my -- my back and forth, my narrative with Amber.  
8 BY MR. ROTTENBORN:  
9 Q You continue in that narrative to say,  
10 Saturday was a hideous blip.  
11 Do you see that?  
12 **A Yeah, yeah.**  
13 Q Now, this is -- you'll recall that you  
14 also use the word "hideous" in the text exchange  
15 that we saw right before the break to describe the  
16 plane flight, right?  
17 MS. VASQUEZ: Objection; assumes facts,  
18 misstates the prior document, misstates prior  
19 testimony.  
20 THE WITNESS: I saw it written there, yes,  
21 but I don't recall the text, as I mentioned  
22 before, but yeah.

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1 BY MR. ROTTENBORN:  
2 Q What did you mean when you said "Saturday  
3 was a hideous blip" in this e-mail?  
4 **A Again, Ben, I'm afraid, same answer, I**  
5 **don't recall. I can't specifically say what I was**  
6 **referring to.**  
7 Q Okay. Now, many of your texts with Amber  
8 on May 25th, 2014, were made public when Amber  
9 obtained a restraining order against Mr. Depp in  
10 May of 2016, correct?  
11 MS. VASQUEZ: Objection. I am going to  
12 caution the witness not to respond to that to the  
13 extent that it calls for attorney-client  
14 communications.  
15 So, Mr. Deuters, if you know that to be  
16 the case, if you know the answer to that outside  
17 of conversations that you had with counsel, then  
18 you can answer; otherwise, I will instruct you not  
19 to answer.  
20 THE WITNESS: Okay. I'll take your lead,  
21 Camille.  
22 BY MR. ROTTENBORN:



<p>153</p> <p>1 Q Mr. Deuters, you became aware in early 2 June 2016 that the text messages between you and 3 Amber in which you say that Johnny had kicked 4 Amber became public, right? You became aware of 5 that well outside of any communications with 6 counsel, correct? 7 <b>A Right, with regard -- yes, seeing them in 8 the public sphere, correct.</b> 9 Q Right. And that was a problem for Johnny 10 at the time because they state very clearly, those 11 text messages, that he had kicked Amber, correct? 12 MS. VASQUEZ: Objection; vague, ambiguous, 13 assumes facts, speculation. 14 BY MR. ROTTENBORN: 15 Q You can answer. 16 <b>A That's what the text incorrectly state.</b> 17 Q And you were contacted by press outlets 18 about these texts and asked to comment, right? 19 MS. VASQUEZ: Objection; assumes facts. 20 THE WITNESS: I was not. 21 MR. ROTTENBORN: Let's pull up the 22 document entitled Deuters 2853.</p>	<p>155</p> <p>1 press outlets and asked to comment on the texts, 2 correct? 3 MS. VASQUEZ: Objection; misstates the 4 testimony, assumes facts, assume -- and lack of 5 foundation. 6 THE WITNESS: I mean, I'm seeing that in 7 front of me, Ben, but I don't recall, and I 8 certainly didn't respond. 9 BY MR. ROTTENBORN: 10 Q Okay. You'd agree that this is a text 11 message that you received, correct? 12 MR. ROTTENBORN: If you can scroll over to 13 the left so he can see. 14 MS. VASQUEZ: Objection; vague as to 15 received. 16 THE WITNESS: Yeah, I see -- you know, I 17 see, you know. 18 MR. ROTTENBORN: Okay. Can you pull up -- 19 THE WITNESS: That's not my number. Or is 20 that -- 21 BY MR. ROTTENBORN: 22 Q Right. I assume that's the number of the</p>
<p>154</p> <p>1 THE TECHNICIAN SPECIALIST: Exhibit 13. 2 (Exhibit No. 13 was marked for 3 identification.) 4 MR. ROTTENBORN: Thank you. Can you, 5 please, scroll to the sixth text message down. 6 Right there. 7 Right there. 8 BY MR. ROTTENBORN: 9 Q Mr. Deuters, this -- I'll represent to you 10 that this document entitled Deuters 2853 came from 11 your document production in the case, which we'll 12 talk about in a bit. 13 Do you see the text that says, hi, 14 Stephen. We have obtained some text messages that 15 involve you, Johnny, and Amber. I just wanted to 16 check with you to see if you have a comment or 17 statement about the text messages. Thank you, 18 Whitney? 19 Do you see that? 20 <b>A I see that.</b> 21 Q Does -- so you did receive comments from 22 press outlets about -- or you were contacted by</p>	<p>156</p> <p>1 person who's -- who sent you that message, 2 correct? 3 <b>A Well, I wouldn't know.</b> 4 Q That is your e-mail, right, 5 stephendeuters@mac.com? 6 <b>A Yes.</b> 7 MR. ROTTENBORN: Okay. Can you pull up 8 Deuters 2887, please. 9 THE TECHNICIAN SPECIALIST: Exhibit 14. 10 (Exhibit No. 14 was marked for 11 identification.) 12 MR. ROTTENBORN: If you can go to the 13 third text up from the bottom, please. 14 BY MR. ROTTENBORN: 15 Q Do you remember being contacted by Whitney 16 Wallace, with Entertainment Tonight, for comment 17 on the texts? 18 MS. VASQUEZ: Objection; assumes facts. 19 THE WITNESS: I don't -- I don't recall 20 it, no, not at all. 21 BY MR. ROTTENBORN: 22 Q Do you see the third text up?</p>

<p style="text-align: right;">157</p> <p>1 <b>A Yeah, yeah.</b> 2 Q It says, hi, Stephen. This is Whitney 3 Wallace, with Entertainment Tonight. There is 4 something we need to talk about. This is my cell. 5 Thank you, Whitney. And then there's another 6 message right underneath it that says, hi, 7 Stephen. We have obtained some text messages that 8 involve you, Johnny, and Amber. I just wanted to 9 check with you to see if you have a comment or 10 statement about the text messages. Thank you, 11 comma, Whitney? 12 Do you see that? 13 <b>A Is that the same -- looks like that's the</b> 14 <b>same one as before, no? Same person?</b> 15 Q It appears to be. 16 <b>A Yeah, I don't recall; and I sadly didn't</b> 17 <b>respond.</b> 18 Q Is that your text message or -- I'm 19 sorry -- is that your cell phone number to the 20 left of that message? 21 <b>A I can't see it, sorry -- oh, there it is,</b> 22 <b>yeah.</b></p>	<p style="text-align: right;">159</p> <p>1 them that the texts were heavily doctored, and 2 that you never told Amber that Johnny had admitted 3 to attacking her, right? 4 MS. VASQUEZ: Objection; asked and 5 answered, argumentative, assumes facts. 6 THE WITNESS: I never spoke with TMZ. 7 BY MR. ROTTENBORN: 8 Q And did you tell TMZ that the texts are 9 suspicious because they didn't have a date? 10 MS. VASQUEZ: Same objections. 11 THE WITNESS: I never spoke with TMZ. 12 MR. ROTTENBORN: Can you pull up 13 exhibit -- and I'll move the last exhibit since 14 the break into evidence. 15 Can you, please, pull up the exhibit 16 entitled TMZ article. 17 THE TECHNICIAN SPECIALIST: Exhibit 15. 18 (Exhibit No. 15 was marked for 19 identification.) 20 MR. ROTTENBORN: If you can just blow up 21 the date right there underneath the headline. 22 BY MR. ROTTENBORN:</p>
<p style="text-align: right;">158</p> <p>1 Q And below that is at least a few links 2 to -- well, strike that. 3 Did you ever have an attorney provide you 4 legal advice relating to those texts? 5 <b>A No, not -- no. I think I would have</b> 6 <b>recalled that.</b> 7 Q And if you had, that's something you would 8 recall, correct? 9 <b>A Yeah, I would think so.</b> 10 MS. VASQUEZ: I'm going to interpose a 11 late objection. 12 MR. ROTTENBORN: Okay. 13 MS. VASQUEZ: Yeah, vague and ambiguous as 14 to having an attorney -- it's vague and ambiguous 15 as to time. 16 BY MR. ROTTENBORN: 17 Q You told TMZ that these texts between you 18 and Amber were doctored, right? 19 MS. VASQUEZ: Objection; assumes facts. 20 THE WITNESS: I never spoke with TMZ, Ben. 21 BY MR. ROTTENBORN: 22 Q But you did speak with TMZ, and you told</p>	<p style="text-align: right;">160</p> <p>1 Q Mr. Deuters, do you recognize this as an 2 article that TMZ published on June 2nd, 2016? 3 MS. VASQUEZ: Mr. Deuters, it might help 4 if you look at the full document. 5 THE WITNESS: I mean, it looks like a 6 formatted document. It appears to be a picture of 7 me. 8 MS. VASQUEZ: The question calls for 9 speculation. 10 BY MR. ROTTENBORN: 11 Q That's a picture of you with Mr. Depp 12 behind you? 13 <b>A Yeah.</b> 14 Q Do you know when that was taken? 15 <b>A Looks quite old.</b> 16 Q Okay. 17 <b>A It's --</b> 18 Q Sorry, go ahead. 19 <b>A No. Just going to say it looks quite</b> 20 <b>considerably older than the date of the article.</b> 21 Q Can you go to the next page, please. 22 Again, and you see this in the middle of</p>



<p style="text-align: right;">161</p> <p>1 the page, there's a representation of a couple -- 2 of part of the text exchange between you and Amber 3 that we looked at earlier, right? 4 MS. VASQUEZ: Objection; assumes -- 5 THE WITNESS: Yeah. 6 MS. VASQUEZ: -- facts, vague. 7 BY MR. ROTTENBORN: 8 Q And ET, you recognize that to be the logo 9 for Entertainment Tonight, correct? 10 MS. VASQUEZ: Calls for speculation. 11 THE WITNESS: I don't know what their logo 12 is, to be honest. 13 BY MR. ROTTENBORN: 14 Q Entertainment Tonight was the same outlet 15 that had a journalist contact you just the day 16 before that we just looked at, right? 17 <b>A The one that said she had obtained my</b> 18 <b>texts?</b> 19 Q Yes. 20 <b>A Okay.</b> 21 Q And at the top of this page it says, 22 Johnny Depp's assistant, Stephen Deuters, tells</p>	<p style="text-align: right;">163</p> <p>1 TMZ or Entertainment Tonight or any press outlet? 2 <b>A I'm afraid I did not.</b> 3 Q Did you make a statement that the text 4 themselves are suspicious because they don't even 5 show a date? 6 MS. VASQUEZ: Objection; asked and 7 answered for the sixth time, argumentative, 8 harassment. 9 THE WITNESS: No. 10 BY MR. ROTTENBORN: 11 Q Did you make a statement to Entertainment 12 Tonight, TMZ, or any other press outlet or 13 journalist that you will testify under oath you 14 never had a conversation about alleged violence 15 with Amber? 16 MS. VASQUEZ: Same objections, asked and 17 answered maybe the seventh time. I've lost count. 18 THE WITNESS: I never had any 19 conversations with TMZ or any other press outlet, 20 no. 21 BY MR. ROTTENBORN: 22 Q Did anyone on your behalf have any</p>
<p style="text-align: right;">162</p> <p>1 TMZ the texts that were posted in which he 2 allegedly apologized to Amber Heard for Johnny's 3 violent behavior are heavily doctored, and he 4 never said Johnny attacked her. 5 Is it your testimony that you never told 6 that to TMZ? 7 MS. VASQUEZ: Objection; asked and 8 answered for the third time. 9 THE WITNESS: Yeah, I never spoke to TMZ. 10 BY MR. ROTTENBORN: 11 Q Did you speak with any journalist or press 12 outlet and convey that message to them that TMZ is 13 reporting? 14 <b>A No, I didn't speak with anyone.</b> 15 Q Below it says, Deuters says he knows of no 16 acts of abuse toward Amber at the hands of Johnny 17 and has never made such a claim to anyone. He 18 adds, Johnny has never been violent toward anyone 19 he knows. 20 Do you see that? 21 <b>A I see that, yes.</b> 22 Q Did you make a statement to that effect to</p>	<p style="text-align: right;">164</p> <p>1 conversation with TMZ or any other press outlet 2 about any of the substance of this article? 3 MS. VASQUEZ: Objection; calls for gross 4 speculation. 5 THE WITNESS: Not to my knowledge, 6 certainly not. 7 BY MR. ROTTENBORN: 8 Q And as you sit here today, you're not 9 claiming in any way that the text messages between 10 you and Amber were doctored in any manner, 11 correct? 12 MS. VASQUEZ: Objection; calls for 13 speculation, calls for a legal conclusion. 14 THE WITNESS: I never found the text, so I 15 can't honestly say whether they were or whether 16 they weren't. 17 BY MR. ROTTENBORN: 18 Q You have no basis to believe that the text 19 messages were doctored in any way, correct? 20 MS. VASQUEZ: Objection; asked and 21 answered, argumentative. 22 And, Mr. Deuters, I'm going to caution</p>



<p>165</p> <p>1 you -- actually, I'm going to instruct you not to 2 answer on the basis of attorney-client privilege. 3 MR. ROTTENBORN: Scott, can you read back 4 the question, please. 5 (The reporter read back as requested.) 6 MS. VASQUEZ: Same instruction. 7 BY MR. ROTTENBORN: 8 Q Other than anything you have learned from 9 your attorneys or communications you've had with 10 your attorneys, you have no basis to believe that 11 these text messages were doctored in any way, 12 correct, Mr. Deuters? 13 MS. VASQUEZ: Same instruction, same 14 objection. 15 BY MR. ROTTENBORN: 16 Q Mr. Deuters, are you refusing to answer 17 the question on the basis of your attorney's 18 instruction? 19 MS. VASQUEZ: On the basis of 20 attorney-client privilege, yes, he is. 21 MR. ROTTENBORN: You're not the witness, 22 Camille. I asked him a question if he is refusing</p>	<p>167</p> <p>1 which I am not asking about, do you have any basis 2 to believe that the texts that we looked at 3 between you and Amber Heard are doctored? 4 MS. VASQUEZ: Mr. Deuters, because you 5 can't answer that question without violating the 6 attorney-client privilege, I am going to, again, 7 instruct you not to answer. 8 BY MR. ROTTENBORN: 9 Q Are you following your attorney's 10 instruction, Mr. Deuters? 11 A Yes. 12 Q Did you ever ask TMZ to retract the 13 statements that they made in that article that 14 were attributed to you? 15 A No. I've never had any contact with them 16 whatsoever, so either way. 17 Q Were you comfortable with the fact that 18 apparently TMZ published an article that had all 19 sorts of alleged falsehoods about things that you 20 now claim you didn't say? Were you -- did that 21 make you uncomfortable? 22 MS. VASQUEZ: Objection; argumentative,</p>
<p>166</p> <p>1 to answer. You're not testifying here. 2 BY MR. ROTTENBORN: 3 Q Mr. Deuters, are you re -- 4 MS. VASQUEZ: He is not answering your 5 question that invades the attorney-client 6 privilege, Mr. Rottenborn. 7 MR. ROTTENBORN: There's nothing that 8 invades the attorney-client privilege, but I'm 9 asking him if he is declining to answer. 10 BY MR. ROTTENBORN: 11 Q Mr. Deuters, are you taking your counsel's 12 advice and not answering my question? 13 A I am taking counsel advice. 14 Q Okay. I'll note -- we will very likely be 15 going to court on this and have you come back for 16 more time, Mr. Deuters, because that's a wildly 17 inappropriate instruction by your counsel. I made 18 clear I was not asking for attorney-client 19 communications. 20 So other than -- let me ask it again; I'll 21 give you another chance. 22 Other than attorney-client communications,</p>	<p>168</p> <p>1 vague. 2 THE WITNESS: Yeah, I'm not sure what to 3 say. I wasn't paying much attention to that side 4 of things, to be quite honest. I don't recall my 5 feelings at the time. 6 BY MR. ROTTENBORN: 7 Q Did you -- did you have any conversations 8 with any of Johnny's representatives stating that 9 you were uncomfortable, that you had been 10 allegedly misquoted by TMZ? 11 MS. VASQUEZ: Objection; misstates prior 12 testimony. 13 THE WITNESS: Not to my knowledge. I 14 don't remember having conversations with his team, 15 with his lawyer team, no. 16 BY MR. ROTTENBORN: 17 Q Did you ever have any conversations with 18 Johnny's legal team at the time about these text 19 messages? 20 MS. VASQUEZ: Asked and answered. 21 THE WITNESS: I can't remember who the 22 legal team were. No, not to my knowledge. I</p>



<p style="text-align: right;">169</p> <p>1 can't remember, sir. 2 MR. ROTTENBORN: Can we pull up Exhibit 1, 3 Catherine, please. 4 THE TECHNICIAN SPECIALIST: Standby. 5 MR. ROTTENBORN: Can you go to page 793 6 and 794. 7 BY MR. ROTTENBORN: 8 Q And in the UK trial, were you asked these 9 questions and did you give this answer, 10 Mr. Deuters? This is at line 22 of page 793: How 11 did they come to say that you said it is my fault. 12 I thought you had said somebody asked you about 13 the texts? 14 Answer: It was Johnny's counsel at the 15 time. 16 Question: A lawyer? 17 Answer: A lawyer or somebody who worked 18 with the lawyers. I guess his divorce lawyers or 19 his divorce team, and they asked me about the 20 texts because they had come out. And they said, 21 are these real, and I said yes. And they said, 22 can you say any more about them? And I said,</p>	<p style="text-align: right;">171</p> <p>1 put it that way -- in Australia in March of 2015 2 between Amber and Johnny? 3 MS. VASQUEZ: Objection; speculation, 4 vague, ambiguous. 5 THE WITNESS: Yes. Not sure quite what 6 you mean by "troublesome," Ben. I remember 7 working in Australia at that time, working on a 8 film. 9 BY MR. ROTTENBORN: 10 Q Sure. And did you -- did you -- the film 11 was Pirates 5, right? 12 A Yeah. 13 Q Did you travel to Australia in early March 14 of 2015? 15 A Yeah, I don't remember the exact date, but 16 if it was late February or early March, in that 17 bracket. 18 Q Leading up to that period, had you -- 19 well, strike that. 20 MR. ROTTENBORN: Can you pull up Deuters 21 2884, please, which we'll mark as the next 22 exhibit.</p>
<p style="text-align: right;">170</p> <p>1 well, they are taken out of context, you know. 2 What I meant by that is really just the bigger 3 picture. I never spoke to TMZ and I never said to 4 anyone, even to counsel, that they were doctored. 5 Did I read that right? 6 A Yes. 7 Q Did you tell Johnny's legal team that the 8 texts were real in June of 2016? 9 MS. VASQUEZ: Objection; asked and 10 answered. 11 THE WITNESS: I mean, yeah, I'm reading 12 that back, but I can't at this stage, at this 13 moment right here, right now, I don't recall that 14 conversation. I recall never having spoke to TMZ, 15 that is very clear; that's my abiding memory of 16 the situation. 17 BY MR. ROTTENBORN: 18 Q Do you recall a -- 19 MR. ROTTENBORN: You can take that exhibit 20 down, please. 21 BY MR. ROTTENBORN: 22 Q Do you recall a troublesome period -- I'll</p>	<p style="text-align: right;">172</p> <p>1 THE TECHNICIAN SPECIALIST: Please 2 standby. 3 Exhibit 16. 4 (Exhibit No. 16 was marked for 5 identification.) 6 MR. ROTTENBORN: Can you just blow up the 7 second text, please, just that row. 8 BY MR. ROTTENBORN: 9 Q Mr. Deuters, do you recognize this as a 10 text sent from you on March 1st, 2015, to -- is CD 11 Christi Dembrowski? 12 A Sorry. I can't see it. It's a bit small. 13 MR. ROTTENBORN: We can blow it up all the 14 way in the left. 15 BY MR. ROTTENBORN: 16 Q In the left-hand column, CD is -- that's 17 Christi Dembrowski, right? 18 A Yeah. 19 Q Okay. And this was a text that you sent 20 to her on March 1st, 2015; is that right? 21 A Yeah, it's entirely possible, yeah. I 22 recall -- I know what that means in the Geoffrey.</p>



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1 **I actually remember that, yep.**  
2 Q Okay. You know, I was going to ask you  
3 just a few questions about this. You said, such a  
4 great afternoon with him today. SG might just  
5 have got through.  
6 Who is SG?  
7 **A I don't know who SG is. I don't know who**  
8 **SG is.**  
9 Q Okay. And you say, we sat with Geoffrey  
10 for over five hugely productive hours.  
11 Who is Geoffrey?  
12 **A That's referring to Geoffrey Rush, the**  
13 **actor.**  
14 Q Okay. Who played with him in Pirates 5?  
15 **A Correct.**  
16 Q Okay. And you said, he was certainly the  
17 man I recognized.  
18 When you say that, you were referring to  
19 Johnny being the man you recognized, right?  
20 **A Or Geoffrey. I don't know.**  
21 Q Okay. And you said, I even got to cancel  
22 Manson for coming back since he didn't want it to

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1 interfere with work or Amber.  
2 Is that referring to canceling an event  
3 where Depp would hang out with Marilyn Manson?  
4 MS. VASQUEZ: Objection; calls for  
5 speculation.  
6 THE WITNESS: Yeah, without researching  
7 further, I don't know. But, I mean, Manson, with  
8 a capital M, must mean something. Maybe he was  
9 touring at the time or something.  
10 BY MR. ROTTENBORN:  
11 Q Johnny often hung out with Marilyn Manson,  
12 right?  
13 MS. VASQUEZ: Objection; vague, calls for  
14 speculation.  
15 THE WITNESS: They did have the occasional  
16 meet, yes, but not very often. He wasn't someone  
17 that I saw much of.  
18 BY MR. ROTTENBORN:  
19 Q Okay. And it was -- you believed that  
20 Marilyn Manson was, let's just say, not a good  
21 influence on Johnny, right?  
22 MS. VASQUEZ: Objection; vague, assumes

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1 facts.  
2 THE WITNESS: I mean, not sure what I'd  
3 say about that. I mean, it's not really for me to  
4 say. I just preferred it when we were working as  
5 opposed to not working. They weren't working  
6 together, so it would have meant we wouldn't have  
7 been working, so I think I'd probably lean towards  
8 that.  
9 BY MR. ROTTENBORN:  
10 Q Marilyn Manson was someone that would --  
11 when Marilyn and Johnny got together, your  
12 understanding was that Johnny would use drugs with  
13 Marilyn Manson, correct?  
14 MS. VASQUEZ: Objection; vague, calls for  
15 speculation.  
16 THE WITNESS: Yeah, I couldn't say that  
17 that was my inference.  
18 BY MR. ROTTENBORN:  
19 Q Do you have any personal knowledge of  
20 Johnny doing drugs with Marilyn Manson?  
21 **A It's not something I witnessed, no.**  
22 Q Did you ever hear from Johnny that he did

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1 drugs with Marilyn Manson?  
2 MS. VASQUEZ: Calls for hearsay.  
3 THE WITNESS: He didn't really speak like  
4 that. So even if it had occurred, it wouldn't be  
5 relayed, so no, no. I don't recall it, no.  
6 MR. ROTTENBORN: Can we go to -- we're  
7 going to come back to this document, but can we  
8 mark as the next exhibit Depp 11297.  
9 THE TECHNICIAN SPECIALIST: Exhibit 17.  
10 (Exhibit No. 17 was marked for  
11 identification.)  
12 MR. ROTTENBORN: Thank you.  
13 BY MR. ROTTENBORN:  
14 Q So the third text down, this is a text  
15 from Johnny to you on March 6, 2015, right?  
16 **A Starting with "honestly"?**  
17 Q Yes.  
18 **A Yep, I see it. I'm just reading it.**  
19 **Okay.**  
20 Q And Johnny was -- on March 6, 2015, Johnny  
21 was in Australia to film Pirates 5, right?  
22 **A Without checking my calendar, I think so,**



<p style="text-align: right;">177</p> <p>1 <b>yeah. I think that's right.</b></p> <p>2 Q And is your recollection that you were in</p> <p>3 Australia at the time as well?</p> <p>4 <b>A Yes, I would have been there at the same</b></p> <p>5 <b>time.</b></p> <p>6 Q And is it fair to say that in a -- I guess</p> <p>7 some colorful language, Johnny is expressing</p> <p>8 discontent with Disney here, right?</p> <p>9 MS. VASQUEZ: Objection; misstates the</p> <p>10 document, calls for speculation, assumes facts,</p> <p>11 and lack of foundation.</p> <p>12 THE WITNESS: Excuse me. It doesn't say</p> <p>13 Disney in particular. It seems more sort of a</p> <p>14 general commentary, perhaps.</p> <p>15 BY MR. ROTTENBORN:</p> <p>16 Q General commentary on what, to your</p> <p>17 understanding?</p> <p>18 MS. VASQUEZ: Calls for speculation.</p> <p>19 THE WITNESS: Yeah, I can see by my reply</p> <p>20 below it, so clearly my presumption. Well, I</p> <p>21 mean, you know, his words they're characters.</p> <p>22 He's being -- assuming -- so, you know, being</p>	<p style="text-align: right;">179</p> <p>1 March 6, 2015, correct?</p> <p>2 <b>A Yes.</b></p> <p>3 Q Do you still stand by those words today</p> <p>4 and have those same feelings toward him?</p> <p>5 MS. VASQUEZ: Objection; compound.</p> <p>6 THE WITNESS: Sorry, Ben. What was the</p> <p>7 question?</p> <p>8 BY MR. ROTTENBORN:</p> <p>9 Q Do you still have those same feelings and</p> <p>10 sentiments toward Mr. Depp today?</p> <p>11 <b>A Certainly.</b></p> <p>12 MR. ROTTENBORN: Catherine, if you can,</p> <p>13 please, go back to Deuters 2884. Thank you.</p> <p>14 BY MR. ROTTENBORN:</p> <p>15 Q Now, at some point you became aware of an</p> <p>16 argument or an altercation that Mr. Depp had with</p> <p>17 Ms. Heard while in Australia, correct?</p> <p>18 MS. VASQUEZ: Objection; vague, assumes</p> <p>19 facts, and calls for speculation.</p> <p>20 THE WITNESS: Yeah, I'm not quite sure.</p> <p>21 At one point I became aware of something --</p> <p>22 BY MR. ROTTENBORN:</p>
<p style="text-align: right;">178</p> <p>1 somewhat down on his -- well, what he ignorantly</p> <p>2 started to think of as his legacy is --</p> <p>3 THE COURT REPORTER: I'm sorry. You have</p> <p>4 to keep your voice up.</p> <p>5 THE WITNESS: Sorry. I'm just re-reading</p> <p>6 the text back.</p> <p>7 BY MR. ROTTENBORN:</p> <p>8 Q He is expressing discontent that his</p> <p>9 Captain Jack Sparrow character and the work he's</p> <p>10 done in the Pirates franchise, right?</p> <p>11 MS. VASQUEZ: Objection; assumes facts,</p> <p>12 misstates the prior testimony, misstates the</p> <p>13 document, calls for speculation.</p> <p>14 THE WITNESS: I don't know if it's</p> <p>15 specific to Captain Jack or general. I don't</p> <p>16 know. But it is discontent, sure.</p> <p>17 BY MR. ROTTENBORN:</p> <p>18 Q Okay. And then you respond to him with</p> <p>19 the text below, right?</p> <p>20 <b>A Yes.</b></p> <p>21 Q And those are all your words and your</p> <p>22 feelings that you expressed to Mr. Depp on</p>	<p style="text-align: right;">180</p> <p>1 Q I just want to know everything that you</p> <p>2 remember about that particular incident, if</p> <p>3 anything.</p> <p>4 MS. VASQUEZ: Objection; calls for a</p> <p>5 narrative, assumes facts, hearsay, and vague.</p> <p>6 THE WITNESS: Yeah, because I wasn't -- I</p> <p>7 didn't stay at the house. And, I mean, I have to</p> <p>8 go back to the memory banks.</p> <p>9 Johnny came to the hotel. He came to the</p> <p>10 hotel. He was brought by, I think, his security</p> <p>11 guys. Came to the room -- I mean, it was clear</p> <p>12 that he cut himself, but he didn't tell us. He</p> <p>13 was quite reticent to say much. I think we --</p> <p>14 then it was probably around then that we realized</p> <p>15 that a serious injury had occurred, but we didn't</p> <p>16 know how.</p> <p>17 BY MR. ROTTENBORN:</p> <p>18 Q You're referring to the tip of his finger</p> <p>19 being severed?</p> <p>20 <b>A Correct, yeah.</b></p> <p>21 Q Okay. And you don't have any personal</p> <p>22 knowledge about how that happened, correct?</p>



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1 **A I did not witness it. No, I was not**  
2 **there.**  
3 Q And Ms. Heard never said anything to you  
4 about how that had happened, correct?  
5 **A No, I don't recall her saying anything**  
6 **directly to me about it.**  
7 Q And what, if anything, did Mr. Depp tell  
8 you about how it had happened?  
9 **A Well, he didn't say -- he didn't say**  
10 **anything --**  
11 Q Okay.  
12 **A -- to begin with because I didn't think he**  
13 **wanted to -- I don't know. Maybe he just didn't**  
14 **want anyone to know. I can't speculate.**  
15 MR. ROTTENBORN: Let's take a look at the  
16 third text down. This is a text from you to --  
17 again, to Christi Dembrowski, right? You say hi,  
18 C.  
19 THE WITNESS: Sorry. Can you make it  
20 bigger?  
21 BY MR. ROTTENBORN:  
22 Q Yeah.

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1 **A Yeah, I see it.**  
2 Q And you say, I'm at the house with Kipper  
3 and Debbie, who are speaking with JD and Amber  
4 respectively, separately. Obviously things have  
5 not calmed over the last day or so.  
6 Do you see that?  
7 **A Yes.**  
8 Q Were you present for any conversations  
9 that Dr. Kipper or Debbie had with Johnny or  
10 Amber --  
11 MS. VASQUEZ: Objection; vague.  
12 BY MR. ROTTENBORN:  
13 Q -- on or around that time?  
14 MS. VASQUEZ: Same objection.  
15 THE WITNESS: I wouldn't have been  
16 directly involved in any conversations that they  
17 would have had directly with them. If I said I  
18 was in the house, I would have been like  
19 downstairs or another room or outside or  
20 something.  
21 BY MR. ROTTENBORN:  
22 Q Okay. So you write about halfway through

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1 that text message, you write, so Kipper is now  
2 talking to JD, hoping to get through to him and  
3 explain to him that, quote, this period needs to  
4 end now before we get into real trouble.  
5 What did you mean by that?  
6 **A Again, going back that far, I couldn't**  
7 **honestly say exactly what I meant by that.**  
8 Q Did you mean -- when you were in this  
9 period, did you mean this period of drug and  
10 alcohol abuse by Johnny?  
11 MS. VASQUEZ: Objection; asked and  
12 answered.  
13 THE WITNESS: I might have just meant the  
14 film. I don't know. Australia. I don't know.  
15 BY MR. ROTTENBORN:  
16 Q You wrote below that, the good news thus  
17 far is that JD did not cancel this meeting and  
18 that he is engaging in conversation.  
19 Do you see that?  
20 **A Yes. Yes.**  
21 Q Was the -- was that good news because that  
22 Johnny didn't cancel a meeting with Dr. Kipper

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1 because he often would cancel meetings with  
2 Dr. Kipper?  
3 MS. VASQUEZ: Objection; calls for  
4 speculation, assumes facts.  
5 THE WITNESS: Yeah, again, I can't -- I  
6 can't answer that specifically. I don't -- I  
7 mean, if Kipper was there, that's -- he didn't  
8 counsel -- I don't know. I don't know. I  
9 couldn't tell you, Ben.  
10 BY MR. ROTTENBORN:  
11 Q Okay. What did you mean by good news?  
12 What was that? You don't recall?  
13 **A I'm trying to. I don't know. Just the**  
14 **fact obviously he was at the meeting. It seems to**  
15 **relate to that.**  
16 Q And it would be good news for Johnny to  
17 take a meeting with Dr. Kipper because Johnny was  
18 a drug and alcohol addict, right?  
19 MS. VASQUEZ: Objection, calls for  
20 speculation, assumes facts, lack of foundation,  
21 argumentative.  
22 THE WITNESS: Yeah, I can't comment on



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1 whether he was a drug and alcohol addict, not  
2 being a addict myself.  
3 BY MR. ROTTENBORN:  
4 Q It was good news because whether or not he  
5 was medically diagnosed as having a drug or  
6 alcohol addiction, you and everyone around him, to  
7 your knowledge, believed that Johnny drank too  
8 much and used drugs too much, correct?  
9 MS. VASQUEZ: Objection; calls for  
10 speculation, assumes facts not in evidence,  
11 argumentative, misstates prior testimony.  
12 THE WITNESS: Yeah, again, you know, not  
13 being specifically aware of the exact criteria  
14 needed to say what a drug and alcohol addict is, I  
15 couldn't comment. It's beyond my pay grade.  
16 BY MR. ROTTENBORN:  
17 Q Okay. In the text below you say that JD  
18 is agreeing to all that Kipper is requesting he do  
19 in order to turn himself around.  
20 Do you see that?  
21 A Yes.  
22 Q And then you say, of course we've heard

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1 that before, so we'll see.  
2 Do you see that?  
3 A I lost that. I've lost it. Where is it?  
4 Where is it? All right. Yeah, I see.  
5 Q And what did you mean when you said, in  
6 order to turn himself around, of course we've  
7 heard that before, so we'll see? What do you mean  
8 by that?  
9 A Again, again, it's seven years ago; I  
10 don't recall these texts. I don't recall the  
11 specifics of them apart from as, you know, face  
12 value.  
13 Q By turn himself around, you meant to end  
14 his drug and alcohol addiction. And by of course  
15 we've heard that before, so we'll see, you meant  
16 he said he was going to go sober before and he  
17 hasn't followed through, so we'll see what  
18 happens?  
19 That's what you meant, isn't it?  
20 MS. VASQUEZ: Objection; misstates the  
21 document, assumes facts not in evidence, lack of  
22 foundation, calls for speculation, asked and

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1 answered.  
2 THE WITNESS: Yeah, it would be purely  
3 speculative of me to say that, yeah.  
4 BY MR. ROTTENBORN:  
5 Q Okay. Now, you and Christi had some  
6 communications about what the messaging should be  
7 about how Johnny hurt his finger, right?  
8 MS. VASQUEZ: Objection; hearsay.  
9 THE WITNESS: I do, I do recall having a  
10 text or two with Christi because we were concerned  
11 about -- well, I think it's because we didn't know  
12 what had happened maybe initially.  
13 BY MR. ROTTENBORN:  
14 Q And you wanted to control the message to  
15 protect Johnny's reputation, right?  
16 MS. VASQUEZ: Objection; assumes facts,  
17 argumentative, vague.  
18 THE WITNESS: We just didn't want the  
19 wrong information to get out when we didn't know,  
20 I suppose, or we didn't have the full picture, we  
21 didn't know where we stood or exactly what had  
22 gone down, so probably just -- yeah, just wanted

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1 to try and control it initially just before  
2 figuring it all out.  
3 BY MR. ROTTENBORN:  
4 Q Right. Even if that -- even if that meant  
5 advancing a false story or false narrative about  
6 how he hurt his finger, right?  
7 MS. VASQUEZ: Objection; misstates prior  
8 testimony, assumes facts, argumentative.  
9 THE WITNESS: Yeah, advancing a false  
10 narrative is a bit strong. I wouldn't say it like  
11 that.  
12 BY MR. ROTTENBORN:  
13 Q Okay. Did you -- you and Christi  
14 brainstormed about what to say to people about how  
15 he hurt his hand, right?  
16 MS. VASQUEZ: Objection.  
17 THE WITNESS: Sorry.  
18 MS. VASQUEZ: Sorry. Objection; vague,  
19 ambiguous, hearsay, assumes facts.  
20 THE WITNESS: I don't recall the specifics  
21 of how, but I do recall having a conversation with  
22 Christi about delivering some information to



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1 production initially before we knew what happened.  
2 BY MR. ROTTENBORN:  
3 Q Okay. If you look at the text below what  
4 we just looked at, it starts with, bandage makes  
5 it look worse; do you see that?  
6 **A Yeah.**  
7 Q You say, I'll speak to Joe and Kenny to  
8 let them know that we will have to figure  
9 something house [sic] hand-wise, although we did  
10 speak about Captain Jack having an injury, so it  
11 could be something. We'll have a brainstorm on  
12 it.  
13 Do you see that?  
14 **A Yeah.**  
15 Q Who are Joe and Kenny?  
16 **A Kenny is one of the -- well, actually I**  
17 **don't know. No. Kenny may be one of the makeup**  
18 **artists. I'm not sure who Joe is.**  
19 Q Okay. And when you said -- I'm sorry. Go  
20 ahead.  
21 **A I just said that they might have been**  
22 **people in the film. Probably just to let them**

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1 **know that, yeah, it was an issue.**  
2 Q Okay. And when you said, we'll have a  
3 brainstorm on it, again that was to figure out  
4 what to tell people about how he hurt his hand,  
5 right?  
6 MS. VASQUEZ: Objection; misstates prior  
7 testimony, assumes facts.  
8 THE WITNESS: Yeah, that would be  
9 speculation.  
10 MR. ROTTENBORN: Can you bring up Depp  
11 11300, please.  
12 THE TECHNICIAN SPECIALIST: Exhibit 18.  
13 (Exhibit No. 18 was marked for  
14 identification.)  
15 MR. ROTTENBORN: Thank you.  
16 BY MR. ROTTENBORN:  
17 Q If you go to the third text down,  
18 Mr. Deuters, there's just a one-liner. It appears  
19 to be a text from Christi Dembrowski to you on  
20 March 9th of 2015; do you see that?  
21 **A Yeah, third one down, yeah.**  
22 Q And she says to you, just make sure you

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1 say you aren't sure how he hurt his hand.  
2 Do you see that?  
3 **A I do.**  
4 Q What did you understand her to be asking  
5 you to refrain from doing?  
6 MS. VASQUEZ: Objection; calls for  
7 speculation.  
8 THE WITNESS: My -- I mean, my assumption  
9 would be speaking to anyone with production  
10 before -- I mean, I don't know what the date -- I  
11 can't remember the date specifically in question,  
12 but maybe that was the first day so we didn't know  
13 what had happened yet.  
14 BY MR. ROTTENBORN:  
15 Q She was asking -- I'm sorry.  
16 **A That's what I would take that to mean.**  
17 Q And she was asking you to claim ignorance  
18 if anyone asks you how Johnny had hurt his hand,  
19 right?  
20 MS. VASQUEZ: Objection; misstates the  
21 document, calls for speculation, asked and  
22 answered.

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1 THE WITNESS: Yeah, I couldn't say any  
2 more on that.  
3 BY MR. ROTTENBORN:  
4 Q If you go to the text below that, this is  
5 a text from Johnny to you on March 9th as well,  
6 correct?  
7 **A Same date?**  
8 Q Yep. Do you see about five lines down  
9 where he says, thank you, by the way, for cleaning  
10 my violent marriage?  
11 **A Clean -- yeah.**  
12 Q What did you understand him to be saying  
13 there?  
14 MS. VASQUEZ: Objection; calls for  
15 speculation.  
16 THE WITNESS: I don't know what he means  
17 by that. I don't know --  
18 BY MR. ROTTENBORN:  
19 Q I'm sorry. Go ahead.  
20 **A I don't know what he means by that.**  
21 **Sorry, Ben.**  
22 Q Do you know -- do you have any reason to



193	1 believe that his marriage to Amber was violent at 2 that time? 3 MS. VASQUEZ: Objection; vague, ambiguous, 4 assumes facts. 5 THE WITNESS: No. 6 BY MR. ROTTENBORN: 7 Q Okay. Did he ever tell you anything about 8 there being violence in his marriage? 9 MS. VASQUEZ: Vague as to time. 10 THE WITNESS: Sorry. I missed that. 11 Sorry, Camille. 12 MS. VASQUEZ: Just said it's vague as to 13 time. 14 THE WITNESS: No, he didn't speak about 15 it. He sometimes would suggest that she was. But 16 the details were never there, and the specifics 17 elude me. 18 BY MR. ROTTENBORN: 19 Q Okay. Well, since you brought that up, I 20 need to ask you questions about it. 21 What, if anything, more specifically than 22 the statement you just said did he tell you about	195	1 Q What do you mean "against his neck"? 2 A I can't remember what he said. It was 3 like a knife or a hand or something like this, 4 attack him during the night basically, something 5 like this. I wish could remember it more 6 specifically, but I remember where we were sat. 7 Q When did you have this conversation? 8 A Sorry. Where or when? 9 Q When? 10 A I don't remember when, that's what I wish 11 I could remember. 12 Q Do you remember what year? 13 A It would have been 2000 – my guess it 14 would have been like '13 or '14. I remember 15 where. I remember exactly where we were at. 16 Q And where was that? 17 A It was in his old offices on Sweetzer, 18 8300 Sweetzer in his office. 19 Q And did he ever admit to you to being 20 violent to Amber? 21 A No, he did not. 22 Q Did he ever tell you that – whether Amber
194	1 any alleged violence by Amber, if there's anything 2 that you can recall? 3 A The only thing I can recall is he once 4 made a comment that he was genuinely scared she 5 might attack him during the night. The specific 6 date, I can't recall, but I remember him saying 7 that to me once. 8 Q Where were you having this conversation? 9 A Actually I do – I can't remember the 10 date. We were in his office, and he was showing 11 me – it was in conjunction with he showed me a 12 clump of hair that had pulled out of his head 13 because he was a bit said. We were trying to work 14 on something. I could tell he wasn't focused. 15 And then he suddenly pulled a bit of hair out of 16 his head, and he said – he said something like 17 that was 2 a.m. or something like this, and then 18 he made the comment about the neck. I wish I 19 could – 20 Q Made the comment about the what? 21 A About – worried that he'd wake up one day 22 with her against his neck.	196	1 had ever defended herself against violence by him? 2 MS. VASQUEZ: Objection; assumes facts not 3 in evidence, misstates the prior testimony. 4 MR. ROTTENBORN: There's plenty of 5 evidence, Camille. 6 MS. VASQUEZ: No, there isn't. Your 7 client's word against how many police officers and 8 other people? 9 BY MR. ROTTENBORN: 10 Q Did he ever -- did he ever tell you that 11 Ms. Heard had defended herself against violence by 12 him? 13 MS. VASQUEZ: Same objections. 14 THE WITNESS: No, no. 15 BY MR. ROTTENBORN: 16 Q Is there anything else you can recall, any 17 other conversations that you had with Johnny 18 relating to any sort of violence from either 19 spouse in their marriage? 20 MS. VASQUEZ: Objection; misstates the 21 prior testimony. 22 THE WITNESS: No.



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1 MR. ROTTENBORN: Can you pull up Deuters  
2 2922, please.  
3 THE TECHNICIAN SPECIALIST: Exhibit 19.  
4 (Exhibit No. 19 was marked for  
5 identification.)  
6 BY MR. ROTTENBORN:  
7 Q And can you look at the top text, please.  
8 This is a text from you to Amber on or  
9 about April 13th, 2015, correct?  
10 **A Again, I see the details up there. Just**  
11 **reading the text now.**  
12 Q Okay.  
13 **A Okay.**  
14 Q And you write to Amber, there was a  
15 notable sea change in his brain mid last week.  
16 Really hope it's one that lasts.  
17 Do you see that?  
18 **A Yeah.**  
19 Q What were you referring to there?  
20 **A The date? I'm not sure. I'm not sure**  
21 **where were we. We were in Los Angeles? Were we**  
22 **back in Australia? Maybe it was back -- we were**

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1 **going back to work.**  
2 Q Is it possible you were referring to --  
3 when you say "sea change," a commitment from  
4 Johnny to get his drug and alcohol use under  
5 control?  
6 MS. VASQUEZ: Objection; misstates the  
7 document, assumes facts, calls for speculation.  
8 THE WITNESS: Yeah, again, I'd be  
9 speculating if that was the case. It could mean  
10 going back to the filming, it could mean getting  
11 back on track in that respect, it could be many  
12 things. I'm trying to think of where we were on  
13 that date, if we were back to filming already.  
14 I'm not sure.  
15 BY MR. ROTTENBORN:  
16 Q And you said it could mean getting back to  
17 filming.  
18 Could it also mean getting clean from  
19 drugs and alcohol?  
20 MS. VASQUEZ: Objection; calls for  
21 speculation, asked and answered.  
22 THE WITNESS: I mean, it's conceivable.

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1 But, yeah, it would be speculation on my behalf.  
2 MR. ROTTENBORN: You can take that off.  
3 BY MR. ROTTENBORN:  
4 Q Now, Johnny would often speak or write in  
5 degrading terms about women, correct?  
6 MS. VASQUEZ: Objection; argumentative,  
7 vague and ambiguous.  
8 THE WITNESS: No, I wouldn't say that was  
9 fair.  
10 BY MR. ROTTENBORN:  
11 Q You've heard him speak in degrading terms  
12 about women, right?  
13 MS. VASQUEZ: Asked and answered,  
14 argumentative.  
15 THE WITNESS: I don't -- I can't recall  
16 right here, right now, no.  
17 BY MR. ROTTENBORN:  
18 Q You've heard him speak in degrading terms  
19 about Amber, right? And when I "speak," I mean  
20 either speak or he sent you texts with degrading  
21 terms about Amber, right?  
22 MS. VASQUEZ: Same objections.

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1 THE WITNESS: I mean, I've seen the texts  
2 in the transcripts and such, if that's what you're  
3 referring to.  
4 BY MR. ROTTENBORN:  
5 Q It wasn't -- you -- you know, I'm going  
6 to -- maybe I'll get another vague and ambiguous  
7 objection, but I don't think that there's any  
8 ambiguity about the propriety -- the impropriety  
9 of certain language that he used. And I'll say,  
10 you know, we're going to see some things, and they  
11 say some things that I don't think there can be  
12 any argument are degrading.  
13 But with that question, Mr. Deuters, have  
14 you heard or seen Mr. Depp call Amber a cunt?  
15 **A I definitely have not seen or heard it.**  
16 **No, I have not.**  
17 Q Have you ever called Amber a cunt?  
18 **A I regrettably did refer, use that term in**  
19 **a text once in third-person reference.**  
20 Q You used that term more than once to refer  
21 to Amber, correct?  
22 MS. VASQUEZ: Objection; argumentative.



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1 THE WITNESS: If I did, I don't recall.  
2 BY MR. ROTTENBORN:  
3 Q All right. Well, let's take a look at  
4 some documents here.  
5 MR. ROTTENBORN: Can you pull up Depp  
6 11275, please.  
7 THE TECHNICIAN SPECIALIST: Standby.  
8 Exhibit 20.  
9 (Exhibit No. 20 was marked for  
10 identification.)  
11 MR. ROTTENBORN: Can you go to the second  
12 text from the bottom, please.  
13 BY MR. ROTTENBORN:  
14 Q This is a text message from Mr. Depp to  
15 you on August 7th, 2014, correct?  
16 **A I see the information in front of me,**  
17 **correct.**  
18 MS. VASQUEZ: It assumes facts.  
19 BY MR. ROTTENBORN:  
20 Q Can you read that text from Mr. Depp to  
21 you on August 7th, 2014?  
22 **A Is that to me, Ben?**

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1 Q Yes, please, read it out loud.  
2 **A She has accused – she has accused me of**  
3 **boozing. I told her no. She's a cunt. I guess**  
4 **I'll go back to 80 or to island alone.**  
5 Q And Johnny's referring to Amber in that  
6 text, correct?  
7 MS. VASQUEZ: Objection; calls for  
8 speculation.  
9 THE WITNESS: I don't recall receiving the  
10 text, so I couldn't -- I couldn't say for certain.  
11 What year was that sent?  
12 BY MR. ROTTENBORN:  
13 Q August 7th, 2014.  
14 Can you think of anyone else that that  
15 could be referring to?  
16 **A No –**  
17 MS. VASQUEZ: Objection.  
18 THE WITNESS: Just try to put my head back  
19 in that 2014 July or August bit, but I don't -- I  
20 can't recall that, where we were at that point.  
21 BY MR. ROTTENBORN:  
22 Q And you can't think of anyone else that he

203

1 may have been referring to with that terminology,  
2 correct?  
3 MS. VASQUEZ: Objection; calls for  
4 speculation, asked and answered.  
5 THE WITNESS: I can't. No, I can't. It  
6 would be pure speculation.  
7 MR. ROTTENBORN: Can you, please, pull up  
8 Depp 11244.  
9 THE TECHNICIAN SPECIALIST: Exhibit 21.  
10 (Exhibit No. 21 was marked for  
11 identification.)  
12 MR. ROTTENBORN: Can you go to the second  
13 text down, please.  
14 The second text from the top, I'm sorry.  
15 BY MR. ROTTENBORN:  
16 Q And, Mr. Deuters, can you just read the  
17 text, the language in that text, please?  
18 **A Sorry. Which one? Second one?**  
19 Q The second one down.  
20 **A Will do. I'll smack the ugly cunt around**  
21 **before I let her in. Don't worry.**  
22 Q Do you know who Marino is in the recipient

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1 line?  
2 **A No, I don't.**  
3 MR. ROTTENBORN: Could you pull up Deuters  
4 2853, please. This has been marked before, as has  
5 been the last one.  
6 THE TECHNICIAN SPECIALIST: Exhibit 22.  
7 (Exhibit No. 22 was marked for  
8 identification.)  
9 MR. ROTTENBORN: Can you -- the fifth text  
10 up from the bottom, please. It's kind of narrow.  
11 BY MR. ROTTENBORN:  
12 Q And, Mr. Deuters, that's your e-mail  
13 address on the "from" line, right?  
14 **A Yes.**  
15 Q Can you read the body of that text  
16 starting with sociopathic show pony?  
17 **A Sociopathic show pony. Machiavellian**  
18 **overlord. Talentless cunt. Good riddance to bad**  
19 **shit. Yes, I do mean Amber, not the mom, even**  
20 **though she was a devil herself.**  
21 Q So this is one instance in which you  
22 referred to Ms. Heard with that particular term,



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1 correct?  
2 MS. VASQUEZ: Objection; vague.  
3 THE WITNESS: Correct.  
4 BY MR. ROTTENBORN:  
5 Q And this was on May 26, 2016, right?  
6 **A The day that, yeah, she -- yeah, yeah,**  
7 **that was the week that she did everything that she**  
8 **did right when Johnny's mother died.**  
9 Q And was that your justification for  
10 calling her what you called her in that text?  
11 **A I find it strange that a word is more**  
12 **offensive than her actions, but I suppose, yeah.**  
13 Q But, in fact, you called her that well  
14 before she broke up with Johnny, correct?  
15 MS. VASQUEZ: Objection.  
16 THE WITNESS: I don't recall.  
17 MR. ROTTENBORN: Can you pull up Deuters  
18 2894, please.  
19 MS. VASQUEZ: When there is a good  
20 stopping point, can we take another five-  
21 10-minute break?  
22 MR. ROTTENBORN: Sure.

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1 MS. VASQUEZ: Thanks.  
2 THE TECHNICIAN SPECIALIST: Exhibit 23.  
3 (Exhibit No. 23 was marked for  
4 identification.)  
5 MR. ROTTENBORN: Right -- the middle of  
6 the page, it's the one that -- go up a little bit  
7 more. It's the one that starts with adore.  
8 Madness here again today.  
9 BY MR. ROTTENBORN:  
10 Q Mr. Deuters, do you see that text right  
11 where the cursor is?  
12 **A Sorry. It's small. I can't see it.**  
13 Q The one that says, adore. Madness here  
14 again today.  
15 **A Yeah, I see it.**  
16 Q And that text is from you, right?  
17 **A Yeah.**  
18 Q And who is --  
19 MR. ROTTENBORN: If you can scroll all the  
20 way over to the left-hand column, please.  
21 BY MR. ROTTENBORN:  
22 Q Who is GG?

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1 **A That's my wife; that's Gina.**  
2 Q That's your wife, okay?  
3 MR. ROTTENBORN: And if you can go back to  
4 the text itself, please.  
5 BY MR. ROTTENBORN:  
6 Q Can you read -- well, let's look at the  
7 date first. What's the date of that text? It's  
8 July 1st, 2015, correct?  
9 **A What is that? May 8th -- no, I don't see**  
10 **it.**  
11 Q July.  
12 **A Yep, okay.**  
13 Q And just read the content of that text,  
14 please?  
15 **A Adore. Madness here again today.**  
16 **"Ambercunt" is a terrible human being.**  
17 MR. ROTTENBORN: Can you pull up Depp  
18 11414, please.  
19 THE TECHNICIAN SPECIALIST: Exhibit 24.  
20 (Exhibit No. 24 was marked for  
21 identification.)  
22 BY MR. ROTTENBORN:

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1 Q This is a text from you to Paul Bettany on  
2 May 26, 2016, correct?  
3 **A Which one?**  
4 Q The one that says "that moment."  
5 **A Yeah.**  
6 Q Do you see that? And you're referring to  
7 Amber when you use the phrase, "But at least the  
8 bitch is gone. Parentheses, yes, I do mean Amber,  
9 not the mom," correct?  
10 **A Yeah, clearly.**  
11 Q So you used degrading terms to refer to  
12 Amber on multiple occasions, correct?  
13 MS. VASQUEZ: Objection; argumentative.  
14 THE WITNESS: Well, on the instances that  
15 have been shown, yes.  
16 MR. ROTTENBORN: Let's do one more, then  
17 we can take a break.  
18 Can you pull up Depp 11253.  
19 THE TECHNICIAN SPECIALIST: Exhibit 25.  
20 (Exhibit No. 25 was marked for  
21 identification.)  
22 MR. ROTTENBORN: Thanks. Just go to the



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1 text at the bottom, please.  
2 BY MR. ROTTENBORN:  
3 Q This is a text from Mr. Depp to you on or  
4 around October 11th, 2013, right?  
5 **A Yeah, I see the information.**  
6 Q In that text message, Mr. Depp asks you,  
7 will you squat in front of the door of the master  
8 bedroom and leave a giant coil of dookie so that  
9 Amber steps in it and thinks that one of the dogs,  
10 primarily Boo, has a major problem? It will be  
11 funny.  
12 Do you see that?  
13 **A I see it, yeah.**  
14 Q Now, I don't want to presume anything.  
15 I assume that you did not actually do  
16 that, correct?  
17 **A You assume correct.**  
18 Q But, nonetheless, Mr. Depp asked you to?  
19 MS. VASQUEZ: Objection; misstates the  
20 document.  
21 THE WITNESS: He didn't ask me to. That's  
22 just his humor on occasion.

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1 BY MR. ROTTENBORN:  
2 Q Is there anywhere in the text where he  
3 says, no, I'm just joking; don't do that?  
4 MS. VASQUEZ: Objection; argumentative.  
5 BY MR. ROTTENBORN:  
6 Q Sorry. If you answered, I didn't hear  
7 you.  
8 **A Sorry. I missed the question.**  
9 Q Was there anywhere in the text where he  
10 said, no, I'm actually joking; don't do that?  
11 **A No, not in the text in front of me. But**  
12 **knowing him and I know his humor.**  
13 MR. ROTTENBORN: Now is probably a good  
14 time for a break.  
15 MS. VASQUEZ: Yeah, let's take a 10-minute  
16 break.  
17 MR. ROTTENBORN: Okay. And I have --  
18 THE VIDEOGRAPHER: You want to go off  
19 first?  
20 MR. ROTTENBORN: Yeah, let's go off.  
21 THE VIDEOGRAPHER: Off record 5:24.  
22 (A recess was taken.)

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1 THE VIDEOGRAPHER: On record 5:39.  
2 BY MR. ROTTENBORN:  
3 Q Mr. Deuters, are you familiar with a  
4 romantic interest of Mr. Depp's named Molly?  
5 **A Molly?**  
6 Q Yes.  
7 **A Doesn't -- no, no memory springs to mind.**  
8 Q No one by that name?  
9 **A I can't -- I can't recall anyone.**  
10 Q Okay. Well, let's take a look at some  
11 documents and see if it refreshes your  
12 recollection.  
13 MR. ROTTENBORN: Can you pull up Depp  
14 8129, please.  
15 THE TECHNICIAN SPECIALIST: Please  
16 standby.  
17 Exhibit 26.  
18 (Exhibit No. 26 was marked for  
19 identification.)  
20 MR. ROTTENBORN: Thank you. Move to admit  
21 this document.  
22 BY MR. ROTTENBORN:

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1 Q These are text messages between you and  
2 Mr. Depp, correct?  
3 MS. VASQUEZ: Objection; assumes facts.  
4 BY MR. ROTTENBORN:  
5 Q We can blow it up if you need to.  
6 **A Yeah, I don't --**  
7 Q That's fine.  
8 **A Can't understand what's being said.**  
9 MS. VASQUEZ: Mr. Deuters, the question is  
10 these are text messages between you and Mr. Depp,  
11 so you haven't been directed to look at anything  
12 yet.  
13 THE WITNESS: All right. I don't -- well,  
14 I see the details there, but I don't recall.  
15 BY MR. ROTTENBORN:  
16 Q And -- I'm sorry -- you have to stay close  
17 to your computer.  
18 **A Yeah.**  
19 Q Do you -- do you acknowledge that these  
20 are text messages between you and Mr. Depp?  
21 **A I see the details now, yeah.**  
22 Q Okay. And Mr. Depp tells you on



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1 February 22nd, 2017 -- he sends you a text  
2 about -- at the very top with some -- hard to make  
3 sense of all of it, but he says, I want Molly's  
4 tiny, drunken, and belligerent, yet somehow  
5 sublime -- one can only hope to trust the  
6 imagination and/or pray to any fucking thing that  
7 is impossibly, spectacularly, stupidly firm, and  
8 bafflingly as pert as a fresh clementine. Play  
9 night for daddy before he walks into the den of  
10 snakes.  
11 Do you see that?  
12 **A Yes.**  
13 Q What did you understand or whom did you  
14 understand Mr. Depp to be referring to?  
15 MS. VASQUEZ: Objection; calls for  
16 speculation.  
17 THE WITNESS: Absolutely no idea reading  
18 that.  
19 BY MR. ROTTENBORN:  
20 Q Okay. Well, you -- in any event,  
21 indeedy [sic]. I'll put it on hold. And Molly.  
22 Certainly clementines are involved. What a lovely

214

1 description. She should be honored by such a  
2 review.  
3 Do you see that?  
4 **A Yeah.**  
5 Q And what did you mean by your response  
6 when you said, I'll put it on hold? What did that  
7 mean?  
8 **A Limits of my imagination. I can't say,**  
9 **yeah.**  
10 Q And does this refresh your recollection of  
11 who Molly is?  
12 **A There's what? Sorry. Oh, my response?**  
13 Q Yes.  
14 **A No, not at the minute.**  
15 Q Okay. Well, let's keep taking a look.  
16 In the next text Mr. Depp says in the  
17 bottom, I am in some species of need. I mean, I'm  
18 only nearly human after all, multiple question  
19 marks.  
20 What did you understand him to be saying  
21 there?  
22 MS. VASQUEZ: Objection; calls for

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1 speculation.  
2 THE WITNESS: So I can't see the text.  
3 BY MR. ROTTENBORN:  
4 Q It's the --  
5 **A There it is.**  
6 Q Yeah, there it is.  
7 **A I don't know. Say Syd Barrett, I don't**  
8 **know who he's referring -- I don't know. I**  
9 **don't -- no, I'm -- I'm plumbing the depths of my**  
10 **brain, but I don't recall these messages and I**  
11 **don't recall as to what he's referring to, I'm**  
12 **afraid.**  
13 Q Okay. Let's plumb a little further then.  
14 You respond to him and you said, indeed,  
15 sir. But all considered in the here and now, the  
16 right moves lie westward. And do not be sad, for  
17 there is much land to be plowed there. Much  
18 indeed. Go and take all that is yours.  
19 Right?  
20 **A Right.**  
21 Q Are you -- you're telling Mr. Depp that he  
22 ought to -- you're referring to Mr. Depp being

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1 with this woman Molly in some sort of sexual  
2 manner, correct?  
3 MS. VASQUEZ: Objection, objection;  
4 misstates the document, calls for speculation,  
5 assumes facts, lack of foundation.  
6 THE WITNESS: I'm trying desperately to  
7 remember who Molly is. I don't know who Molly is  
8 or what he's referring to. Sometimes he goes on  
9 very colorful little journeys by himself with  
10 texts, and this may be one of those such  
11 instances, like the dookie one you showed me  
12 earlier.  
13 BY MR. ROTTENBORN:  
14 Q Right, right, like that one, except this  
15 one is about a woman where he said -- you say, go  
16 and take all that is yours.  
17 You're not suggesting that he actually  
18 owned whoever Molly is, correct?  
19 MS. VASQUEZ: Objection; argumentative.  
20 THE WITNESS: Sorry. I didn't capture  
21 that --  
22 BY MR. ROTTENBORN:



<p style="text-align: right;">217</p> <p>1 Q You're not suggesting that Molly belonged 2 to him, correct? 3 <b>A No.</b> 4 MS. VASQUEZ: Objection; vague. 5 THE WITNESS: Not knowing who Molly is, 6 no, I don't. I don't think so. I don't know, no. 7 I'd say no. 8 BY MR. ROTTENBORN: 9 Q You are suggesting that he -- that he take 10 advantage of a woman, correct? 11 MS. VASQUEZ: Objection; argumentative -- 12 THE WITNESS: No. 13 MS. VASQUEZ: -- misstates the document, 14 assumes facts. 15 THE WITNESS: I wouldn't suggest that. 16 BY MR. ROTTENBORN: 17 Q In the -- the text below is a response by 18 Mr. Depp to you, correct? 19 <b>A Yes.</b> 20 Q Why don't you go ahead and read that, 21 please. 22 <b>A You want me to read it?</b></p>	<p style="text-align: right;">219</p> <p>1 document, assumes facts. 2 THE WITNESS: No, I don't think so. 3 That's a bit of a leap. 4 BY MR. ROTTENBORN: 5 Q Is -- is this text exchanges again 6 indicative of the ways in which Mr. Depp would 7 talk about women to you, correct? 8 MS. VASQUEZ: Objection; vague, ambiguous. 9 THE WITNESS: No, no. Reading that, it 10 reads like a psychedelic novel. In all 11 likelihood, there was no truth behind it, but I 12 don't recall. It's a very colorful exchange. 13 BY MR. ROTTENBORN: 14 Q Do you find it -- do you find it 15 disrespectful to use a phrase like "Molly's pussy 16 is rightfully mine"? Does that strike you as 17 disrespectful to women? 18 MS. VASQUEZ: Objection; argumentative, 19 relevance. 20 BY MR. ROTTENBORN: 21 Q You can answer. 22 <b>A Yeah, I can see how it can be seen in that</b></p>
<p style="text-align: right;">218</p> <p>1 Q Yeah, the one starting with "right, 2 exactly"? 3 <b>A Right, exactly. Molly's Pussy is</b> 4 <b>rightfully mine. Should I not just bust in and</b> 5 <b>remove its hinges tonight?</b> 6 Q And then read the next text from Mr. Depp 7 to you as well, please. 8 <b>A I want to change her understanding of what</b> 9 <b>it is like to be thrashed about like a pleading</b> 10 <b>mackerel. I need. I want. I take.</b> 11 Q Then if you go to the next page, you 12 write, crikey, man. I wonder what her 13 understanding of being thrashed about like a 14 mackerel was like otherwise? The world is for you 15 to take again. And take it, you will. Happy 16 travels. Sleep. See you in a few days. 17 Do you see that? 18 <b>A Yes.</b> 19 Q So you're encouraging Mr. Depp in that 20 text to do what he had just said he was going to 21 do to this person named Molly, right? 22 MS. VASQUEZ: Objection; misstates the</p>	<p style="text-align: right;">220</p> <p>1 <b>way. But knowing him and knowing who he is, I</b> 2 <b>don't see it like that in this instance.</b> 3 Q You don't view that as being disrespectful 4 to women? 5 MS. VASQUEZ: Objection; asked and 6 answered. 7 THE WITNESS: Not with respect to who said 8 it. 9 BY MR. ROTTENBORN: 10 Q And you have no knowledge, sitting here 11 today, about who Molly is? 12 <b>A Well, I mean, no. Truly, I can't -- no</b> 13 <b>one appears. No one appears.</b> 14 MR. ROTTENBORN: You can take that down, 15 please. Can you pull up Deuters 442. 16 (Exhibit No. 27 was marked for 17 identification.) 18 BY MR. ROTTENBORN: 19 Q And while she's doing that, Mr. Deuters, 20 you would -- would you agree that the -- when 21 Ms. Heard got the temporary restraining order and 22 when -- in May of 2016 and the press surrounding</p>



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1 that and the divorce proceedings, that those had a  
2 significant, negative effect on Mr. Depp's career?  
3 MS. VASQUEZ: Objection; assumes facts,  
4 calls for a legal conclusion, speculation.  
5 THE WITNESS: I mean, those instances  
6 having a negative effect on his career thereafter?  
7 BY MR. ROTTENBORN:  
8 Q Yes.  
9 **A I mean, yeah, from the cheap seats, yeah.**  
10 Q Right. From the time that she went public  
11 with her allegations against him in May of 2016,  
12 right?  
13 MS. VASQUEZ: Same objections; calls for  
14 speculation.  
15 THE WITNESS: Yeah, I mean, it's -- the  
16 effect is there for all to see and in my opinion  
17 (indiscernible).  
18 BY MR. ROTTENBORN:  
19 Q And at some point Mr. Depp tried to engage  
20 with a Rolling Stone to write an article about him  
21 to help rehabilitate his image, correct?  
22 MS. VASQUEZ: Objection; assumes facts,

222  
1 lack of foundation, hearsay, speculation.  
2 THE WITNESS: I --  
3 BY MR. ROTTENBORN:  
4 Q You can answer.  
5 **A I remember a Rolling Stone article. I**  
6 **wasn't party much to it, but I remember a Rolling**  
7 **Stone article.**  
8 **Was it 2017?**  
9 Q Yeah. Let's take a look at this, this  
10 e-mail up at the top, please. So this is an  
11 e-mail from Johnny to the owner of Rolling Stone  
12 magazine, right, Jann Wenner?  
13 **A Yeah.**  
14 Q And in there -- and you're cc'ed on that,  
15 right -- or bcc, right?  
16 **A Yeah.**  
17 Q And in there, Mr. Depp provides your  
18 number and Nathan Holmes' number as someone to  
19 whom a Rolling Stone journalist could contact or  
20 reach out to about an article they were writing on  
21 Johnny, right?  
22 MS. VASQUEZ: Objection; calls for

223  
1 speculation, hearsay.  
2 THE WITNESS: Yeah, yeah. So are you  
3 saying do I see my name in the text of the e-mail?  
4 BY MR. ROTTENBORN:  
5 Q Yeah. Well, what I'm trying to figure out  
6 is did you ever have -- were you ever contacted by  
7 a journalist from Rolling Stone about this  
8 article?  
9 **A I don't recall being contacted about it.**  
10 **I remember -- I do recall the article occurring.**  
11 **I don't recall being party to arranging it, to the**  
12 **best of my knowledge.**  
13 Q Were you -- had you read the article?  
14 **A I probably read it back then when it was**  
15 **published.**  
16 Q Do you recall, as you sit here today,  
17 being present for any of the events described in  
18 the article?  
19 **A I don't think -- no, I don't think I ever**  
20 **met the journalist. I don't -- I don't recall**  
21 **ever meeting the journalist or being around when**  
22 **it was -- when it was happening, no.**

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1 Q Okay. Would you agree that this article  
2 also had a negative effect on Mr. Depp's  
3 reputation?  
4 MS. VASQUEZ: Objection; calls for  
5 speculation, calls for a conclusion, improper  
6 opinion.  
7 THE WITNESS: I mean, yeah, just my  
8 opinion is -- I don't remember liking the outcome  
9 very much (indiscernible). Wouldn't know --  
10 wouldn't know what to say.  
11 BY MR. ROTTENBORN:  
12 Q Who is Fahar?  
13 MR. ROTTENBORN: You can take this down,  
14 please. Thanks.  
15 THE WITNESS: Fahar, that's a good  
16 question. I don't know if anyone knew who Fahar  
17 was. I can't remember his surname. I don't  
18 really know who he was. He was a character that  
19 sort of turned up for a brief period. How to  
20 describe him. Felt like someone who was maybe  
21 trying to take advantage of Johnny in a difficult  
22 situation. He wasn't particularly well-liked by



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1 the crew or trusted. I don't think he was around  
2 that long.  
3 BY MR. ROTTENBORN:  
4 Q Was this after Johnny split with Amber?  
5 **A I want to say yeah. I'm pretty sure. I**  
6 **think it was quite soon – he may have been**  
7 **involved or lurking about before. But, you know,**  
8 **you can imagine given his position have a lot of**  
9 **people wanting to get advantage or get involved or**  
10 **jump on a gravy train or whatever because I think**  
11 **I heard his name mentioned before, but I think he**  
12 **stepped into the world proper after – after the**  
13 **Amber situation, yeah.**  
14 Q And why wasn't he trusted by you?  
15 MS. VASQUEZ: Objection; misstates the  
16 prior testimony.  
17 THE WITNESS: We didn't know who he was,  
18 and he just became very friendly very quickly. I  
19 don't trust people that behave like that in  
20 general.  
21 BY MR. ROTTENBORN:  
22 Q Very friendly with Johnny?

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1 **A Yeah. He made his – he made an attempt**  
2 **to be, certainly. I think he was mistrustful of**  
3 **him as well, but he was – yeah, he was quite sad**  
4 **during that period, you know, vulnerable.**  
5 Q Johnny was?  
6 **A Certainly.**  
7 Q Does Johnny still have, to your knowledge,  
8 business dealings with Fahar?  
9 MS. VASQUEZ: Objection; assumes facts,  
10 vague, calls for speculation.  
11 THE WITNESS: Not to the best of my  
12 knowledge, no.  
13 MR. ROTTENBORN: Can you pull up Deuters  
14 2858, please.  
15 THE TECHNICIAN SPECIALIST: Standby.  
16 Exhibit 28.  
17 (Exhibit No. 28 was marked for  
18 identification.)  
19 MR. ROTTENBORN: Can you go -- it's about  
20 six or seven down. It's the long one, the six or  
21 seven down, please.  
22 BY MR. ROTTENBORN:

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1 Q So, Mr. Deuters, I'll direct --  
2 MR. ROTTENBORN: Just a little bit up.  
3 There we go.  
4 BY MR. ROTTENBORN:  
5 Q I'll direct your attention to the one that  
6 starts with, TB doesn't believe in the theme park.  
7 MR. ROTTENBORN: Maybe just blow that up a  
8 little bit.  
9 BY MR. ROTTENBORN:  
10 Q And this is a text message from someone  
11 named B-e-u-g-l-e to you on or about October 2016.  
12 Do you see that?  
13 **A I -- yeah.**  
14 Q Who is Beugle?  
15 **A She's a very old personal friend of mine**  
16 **and my wife.**  
17 Q Okay. Does she -- is she friends with  
18 Johnny?  
19 MS. VASQUEZ: Objection; calls for  
20 speculation.  
21 THE WITNESS: I don't know if they are  
22 friends. They may have had interaction. I don't

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1 think they knew each other. Vaguely.  
2 BY MR. ROTTENBORN:  
3 Q Okay. When she says, TB doesn't believe  
4 in the theme park, who do you understand TB to be  
5 referring to?  
6 **A That would be -- that would be Tim Burton**  
7 **because Beugle worked for -- worked with Tim for a**  
8 **number of years. That's who that would be.**  
9 Q What is your understanding of what she's  
10 referring to when she refers to a theme park?  
11 **A Just that, there was an idea, a business**  
12 **proposition that Johnny has had for many years**  
13 **with regards to creating a sort of park of sort of**  
14 **Tim-esque rides for kids and families.**  
15 Q And was the idea for that park being  
16 floated to Johnny by Fahar?  
17 MS. VASQUEZ: Objection; calls for  
18 speculation, assumes facts.  
19 THE WITNESS: Yeah, I don't know. I'd  
20 certainly say it wasn't Fahar's idea, but perhaps.  
21 Again, speculating. Fahar is the kind of person  
22 to suggest that he could facilitate such things.



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1 That would be my guess.  
2 BY MR. ROTTENBORN:  
3 Q When she writes to you in the text, being  
4 beholden to the Saudis is a dangerous game makes  
5 Amber look like Bambi. Fahar facilitates dealing  
6 with the devil. TB is concerned.  
7 What did you understand that to mean?  
8 MS. VASQUEZ: Objection; compound, calls  
9 for speculation.  
10 THE WITNESS: I guess is insinuating  
11 Fahar's business dealings. But I couldn't comment  
12 on that. I'm not --  
13 MR. ROTTENBORN: Okay. Can you pull up  
14 Deuters 2917, please.  
15 THE TECHNICIAN SPECIALIST: Exhibit 29.  
16 (Exhibit No. 29 was marked for  
17 identification.)  
18 MR. ROTTENBORN: Actually, we can take  
19 that down.  
20 BY MR. ROTTENBORN:  
21 Q Mr. Deuters, at some point in time you --  
22 you made a significant request to Mr. Depp for him

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1 to give you money for a house, right?  
2 MS. VASQUEZ: Objection; assumes facts,  
3 lack of foundation.  
4 THE WITNESS: No, no.  
5 BY MR. ROTTENBORN:  
6 Q You don't recall that?  
7 **A Someone on my behalf said, oh, you**  
8 **should – once said, oh, you should lend Stephen**  
9 **to help buy a flat, and I sort of said, no, I'm**  
10 **uncomfortable with that, and I didn't borrow any**  
11 **money.**  
12 Q Okay. Did you ever -- but you did ask  
13 Mr. Depp if you could borrow money, right?  
14 MS. VASQUEZ: Objection; misstates the  
15 prior testimony, asked and answered.  
16 THE WITNESS: No, I personally didn't, no,  
17 not that I recall.  
18 MR. ROTTENBORN: Can you pull up Depp  
19 8142, please.  
20 THE TECHNICIAN SPECIALIST: Please  
21 standby.  
22 MR. ROTTENBORN: Actually, instead of that

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1 one, can we pull up Depp 8131 through 8150.  
2 THE TECHNICIAN SPECIALIST: Please  
3 standby.  
4 MR. ROTTENBORN: Thank you.  
5 THE TECHNICIAN SPECIALIST: Counsel, that  
6 was 8131?  
7 MR. ROTTENBORN: Yeah, 8131 -- well, we  
8 can just pull up Depp 8142, that's fine.  
9 THE TECHNICIAN SPECIALIST: Exhibit 30.  
10 (Exhibit No. 30 was marked for  
11 identification.)  
12 MR. ROTTENBORN: Thank you.  
13 BY MR. ROTTENBORN:  
14 Q Let's take a look at the top text first.  
15 This is a text from Johnny to you around  
16 February 3rd, 2019; do you see that?  
17 **A Yeah.**  
18 Q In it he says, I've been left without the  
19 pot, pot why, all caps. Please help.  
20 Do you see that?  
21 **A Yeah.**  
22 Q Would that be a fairly typical request by

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1 Johnny to you to obtain pot for him when he didn't  
2 have it?  
3 MS. VASQUEZ: Objection; vague, calls for  
4 speculation.  
5 THE WITNESS: I wouldn't say typical.  
6 He's probably not talking about garden plants, but  
7 it was only ever marijuana that, you know, I ever  
8 really got for him, so it's perfectly conceivable,  
9 but not typical, no.  
10 MR. ROTTENBORN: Okay. Can you go to the  
11 third text down, please, the one that starts with,  
12 hey, sweetie.  
13 BY MR. ROTTENBORN:  
14 Q And this is a text from you to Johnny,  
15 right, on February 8, 2019?  
16 **A I think you'll find out it's a**  
17 **cut-and-paste job. They are not my words.**  
18 Q But they are words that you sent to  
19 Johnny, right?  
20 **A I wouldn't call him sweetie. I know what**  
21 **that is. They are not my words.**  
22 Q What is it?



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1 **A That's from an old friend of his asking**  
2 **for help.**  
3 Q Is it from -- if you go to the text  
4 message above, it says from Lori. Is that --  
5 **A Where does it say that? Oh, yeah, there**  
6 **you go, that's right, yeah.**  
7 Q And who is Lori?  
8 **A That was Lori Depp, his first wife.**  
9 Q Okay. So she's asking him for money to  
10 buy a house?  
11 MS. VASQUEZ: Objection; calls for  
12 speculation, hearsay.  
13 BY MR. ROTTENBORN:  
14 Q She contacted you and asked you to pass  
15 along a request to Mr. Depp to by a house -- to  
16 loan her money to buy a house or to give her money  
17 to buy a house, right?  
18 MS. VASQUEZ: Hearsay, speculation,  
19 assumes facts.  
20 THE WITNESS: I mean, yeah. I mean,  
21 whatever is in the body of the text; you know,  
22 whatever I passed on is --

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1 BY MR. ROTTENBORN:  
2 Q Do you -- I'm sorry for interrupting you.  
3 Do you recall one way or the other whether  
4 Johnny did give her money or loan her money for a  
5 house?  
6 MS. VASQUEZ: Objection; calls for  
7 speculation.  
8 THE WITNESS: I don't. It wouldn't have  
9 gone through me if he did. It would have gone  
10 through his business managers, so I can't comment  
11 on that. I don't know.  
12 BY MR. ROTTENBORN:  
13 Q Other than your -- other than your salary  
14 that we talked about at the beginning of the  
15 deposition, have you ever received any gifts from  
16 Johnny that have a value of over \$5,000?  
17 **A He sent me and my wife to Bath in 2007 for**  
18 **a honeymoon for three or four days to a nice**  
19 **hotel. Maybe that was more than \$5,000. A long**  
20 **time ago now, 2007 that was.**  
21 **I don't, I don't -- I'm trying to recall.**  
22 **No. I mean, no houses or cars or crazy things**

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1 **like that. No, I can't really recall. Maybe a**  
2 **nice pen, but nothing I can recall over that sort**  
3 **of value.**  
4 Q What about any bonuses in addition to your  
5 salary?  
6 **A No. We got bonuses from the company for a**  
7 **number of years, but I don't think it ever**  
8 **occurred for a while, maybe five, six years so --**  
9 **and no bonuses, no, otherwise from him, no. I**  
10 **mean -- no, not that I can recall. I have not**  
11 **received any cash bonuses or gifts above \$5,000 I**  
12 **can recall.**  
13 Q And you haven't received any bonuses from  
14 Depp's companies in five or six years?  
15 **A Yes, that's correct.**  
16 Q Is that because for the last five or six  
17 years Mr. Depp hasn't been -- the revenue that he  
18 or his companies bring in hasn't been sufficient  
19 to justify bonuses, to your knowledge?  
20 MS. VASQUEZ: Objection; calls for  
21 speculation, assumes facts.  
22 THE WITNESS: Yeah, I couldn't say, Ben.

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1 It's not in my realm to dole out -- dole out those  
2 things.  
3 MR. ROTTENBORN: With that, Mr. Deuters, I  
4 don't think I have any other questions at this  
5 time. If Ms. Vasquez has questions for you, I may  
6 have some. But otherwise, I don't.  
7 MS. VASQUEZ: I have no questions.  
8 THE VIDEOGRAPHER: Is there anything else  
9 before we close?  
10 MS. VASQUEZ: No, not from me.  
11 THE VIDEOGRAPHER: Mr. Rottenborn?  
12 MR. ROTTENBORN: No.  
13 THE VIDEOGRAPHER: Time is 6:10, and this  
14 concludes today's deposition of Stephen Deuters.  
15 We're off the record.  
16 (The deposition adjourned at 6:10 p.m.)  
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Transcript of Stephen Deuters  
Conducted on February 24, 2022

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1 CERTIFICATE OF SHORT HAND REPORTER - NOTARY PUBLIC

2 I, Scott D. Gregg, RPR, a Notary Public,  
3 the officer before whom the foregoing deposition  
4 was taken, do hereby certify that the foregoing  
5 transcript is a true and correct record of the  
6 testimony given; that said testimony was taken by  
7 me stenographically and thereafter reduced to  
8 typewriting under my supervision; that reading and  
9 signing was not requested; and that I am neither  
10 counsel for or related to, nor employed by any of  
11 the parties to this case and have no interest,  
12 financial or otherwise, in its outcome.

13 IN WITNESS WHEREOF, I have hereunto set my  
14 hand and affixed my notarial seal this day of  
15 2022.

16 My commission expires July 31, 2024.

17 Scott D. Gregg RPR

18  
19 NOTARY PUBLIC IN AND FOR THE  
20 COMMONWEALTH OF VIRGINIA  
21 Notary Registration No. 215323  
22