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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

JOHN C. DEPP, II, SCARAMANGA)
BROS., INC., A CALIFORNIA)
CORPORATION; L.R.D.)
PRODUCTIONS, INC., A CALIFORNIA)
CORPORATION, INFINITUM NIHIL, A)
CALIFORNIA CORPORATION,)
PLAINTIFFS,)

vs.) No. BC680066

BLOOM HERGOTT DIEMER ROSENTHAL)
LAVIOLETTE FELDMAN SCHENKMAN &)
GOODMAN, LLP, JACOB A. BLOOM)
AND DOES 1-30,)
DEFENDANTS.)

BLOOM HERGOTT DIEMER ROSENTHAL)
LAVIOLETTE FELDMAN SCHENKMAN &)
GOODMAN, LLP,)
CROSS-COMPLAINANTS,)

vs.)
JOHN C. DEPP, II, SCARAMANGA)
BROS., INC., A CALIFORNIA)
CORPORATION; L.R.D.)
PRODUCTIONS, INC., A CALIFORNIA)
CORPORATION, INFINITUM NIHIL, A)
CALIFORNIA CORPORATION,)
CROSS-DEFENDANTS.

VIDEOTAPED DEPOSITION OF TRINITY CORRINE ESPARZA
FRIDAY, JANUARY 25, 2019

JOB NO. 3195110
REPORTED BY: D'ANNE MOUNGEY, CSR 7872
Pages 1- 113

1 VIDEOTAPED DEPOSITION OF TRINITY CORRINE ESPARZA, ESQ.
2 TAKEN ON BEHALF OF PLAINTIFFS AT 1100 GLENDON AVENUE,
3 SUITE 1840, LOS ANGELES, CALIFORNIA, COMMENCING AT
4 11:26 A.M. ON FRIDAY, JANUARY 25, 2019, BEFORE D'ANNE
5 MOUNGEY, CSR 7872.
6
7
8 APPEARANCES OF COUNSEL:
9
10 FOR THE PLAINTIFFS:
11 BROWN RUDNICK
12 BY: BENJAMIN G. CHEW, ESQ.
13 601 THIRTEENTH STREET NW
14 SUITE 600
15 WASHINGTON, DC 20005
16 202.536.1763
17 BCHEW@BROWNRUDNICK.COM
18 (NOT PRESENT)
19 -AND-
20 BROWN RUDNICK
21 BY: CAMILLE M. VASQUEZ, ESQ.
22 2211 MICHELSON DRIVE
23 SEVENTH FLOOR
24 IRVINE, CALIFORNIA 92612
25 949.752.7100
CVASQUEZ@BROWNRUDNICK.COM
(NOT PRESENT)

Page 2

1 APPEARANCES (CONTINUED):
2
3 FOR THE DEFENDANTS
4 FREEDMAN & TAITELMAN, LLP
5 BY: BRYAN J. FREEDMAN, ESQ.
6 1901 AVENUE OF THE STARS
7 SUITE 500
8 LOS ANGELES, CALIFORNIA 90067
9 310.201.0005
10 BFREEDMAN@FTLLP.COM
11 (NOT PRESENT)
12
13 ALSO PRESENT:
14 STEVEN TOGAMI, VIDEOGRAPHER
15
16
17
18
19
20
21
22
23
24
25

Page 4

1 APPEARANCES (CONTINUED)
2
3 FOR THE PLAINTIFFS:
4 STEIN MITCHELL BEATO & BISSNER
5 BY: BRITTANY W. BILES, ESQ.
6 901 15TH STREET NW
7 SUITE 700
8 WASHINGTON DC 20005
9 202.601.1602
10 BBILES@STEINMITCHELL.COM
11 -AND-
12 BUCKLEY SANDLER, LLP
13 BY: FREDRICK S. LEVIN, ESQ.
14 100 WILSHIRE BOULEVARD
15 SUITE 1000
16 SANTA MONICA, CALIFORNIA 90401
17 310.424.3984
18 FLEVIN@BUCKLEYSANDLER.COM
19 (NOT PRESENT)
20
21 FOR THE DEFENDANTS:
22 REED SMITH, LLP
23 BY: MATHEW M. WRENSHALL, ESQ.
24 355 SOUTH GRAND AVENUE
25 SUITE 2900
LOS ANGELES, CALIFORNIA 90071
213.457.8076
MWRENSHALL@REEDSMITH.COM

Page 3

1 INDEX
2
3 WITNESS EXAMINATION PAGE
4 TRINITY CORRINE ESPARZA
5 BY MS. BILES 8
6 BY MR. WRENSHALL 100
7
8
9
10 EXHIBITS
11
12 NO. PAGE DESCRIPTION
13 EXHIBIT 204 31 THUMB DRIVE
14
15
16
17
18 QUESTIONS INSTRUCTED NOT TO ANSWER
19 (NONE)
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23
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25

Page 5

1 LOS ANGELES, CALIFORNIA
 2 FRIDAY, JANUARY 25, 2019; 11:26 A.M.
 3
 4
 5 THE VIDEOGRAPHER: Good morning. We're on 11:26:00
 6 the record at 11:26 a.m. on January 25th, 2019.
 7 Please note that the microphones are sensitive and
 8 may pick up whispers, private conversations and
 9 cellular interference. And video recording will
 10 continue to take place unless all parties agree to 11:26:21
 11 go off the record.
 12 This is media unit number 1 of the video
 13 recorded deposition of Trinity Corrine Esparza taken
 14 by counsel for the plaintiffs and cross-defendants
 15 in the matter of "John C. Depp, II, et al., versus 11:26:40
 16 Bloom Hergott Diemer Rosenthal Laviolette Feldman
 17 Schenkman & Goodman, LLP, et al.," and related
 18 cross-action, filed in the Superior Court of the
 19 State of California for the County of Los Angeles.
 20 Case number BC 680066. 11:27:09
 21 This deposition is being held at the
 22 Stalwart Law Group, located at 1100 Glendon Avenue,
 23 Los Angeles, California, 90024. My name is Steven
 24 Togami from the firm Veritext Legal Solutions, and I
 25 am the videographer. The court reporter is D'Anne 11:27:35

Page 6

1 Moungey from the firm Veritext Legal Solutions. I
 2 am not related to any party in this action, nor am I
 3 financially interested in the outcome.
 4 If there are any objections to proceeding,
 5 please state them at the time of your appearance. 11:27:55
 6 At this time, will counsel and all present
 7 please state their appearances and affiliations for
 8 the record.
 9 MS. BILES: Brit Biles, Stein Mitchell
 10 Betao & Missner for Mr. Depp and his companies. 11:28:08
 11 MR. WALDMAN: Adam Waldman, Endeavor Law
 12 Firm for Mr. Depp and his companies.
 13 MR. WRENSHALL: Mathew Wrenshall with Reed
 14 Smith for Bloom Hergott and Jacob Bloom.
 15 THE VIDEOGRAPHER: Thank you. 11:28:22
 16 Can we please have the oath.
 17 THE WITNESS: Trinity Esparza on behalf of
 18 Mr. Depp.
 19
 20 TRINITY CORRINE ESPARZA,
 21 having been first duly sworn by the reporter, was
 22 examined and testified as follows:
 23 ///
 24 ///
 25 ///

Page 7

1 EXAMINATION
 2 BY MS. BILES:
 3 Q Good morning, Ms. Esparza. My name is Brit
 4 Biles. I will be asking you some questions today.
 5 As you can see, we have a court reporter 11:28:52
 6 here. She's taking down everything that we say, so
 7 it's important that we not talk over each other.
 8 Sometimes when people get in conversations, they
 9 anticipate what someone is going to say. But in
 10 this situation, let me finish my question before you 11:29:06
 11 give your answer, and I'll try to do the same and
 12 let you finish your answer before I ask my next
 13 question.
 14 For the same reason, nonverbal answers
 15 can't be recorded on the record, like nods or 11:29:19
 16 "uh-huh's" or things of that nature, so it's very
 17 important to respond with a verbal answer. I'll do
 18 my best to remind you if I see you lapsing into any
 19 uh-huh's or anything. Just try your best just to
 20 answer verbally. 11:29:35
 21 If you answer a question, I'm going to
 22 assume that you understood my question. So if you
 23 don't understand a question, just go ahead and let
 24 me know and I'm happy to rephrase it in a way that
 25 is understandable. Sometimes my questions aren't as 11:29:48

Page 8

1 good as I think they are. Just bear with me and
 2 I'll try to get to a good question.
 3 If you need to take a break at any point,
 4 let me know and we can go off the record for you to
 5 take a break. This isn't a marathon or some sort of 11:30:01
 6 endurance test. Just let me know. I just ask if
 7 there is a question pending, that you answer the
 8 question before we go off the record and take the
 9 break.
 10 Does all of that sound fair? 11:30:12
 11 A Yes.
 12 Q What do you do for a living, Ms. Esparza?
 13 A I own the concierge and security company
 14 that runs the Eastern Columbia building.
 15 Q What is a concierge and security company? 11:30:27
 16 A I provide the front desk staffing.
 17 Q What does that mean?
 18 A We monitor the cameras and make sure that
 19 no one can come in and out of the building without
 20 consent and authorized access. We -- sorry. I'm a 11:30:46
 21 little nervous.
 22 We provide our residents with, like,
 23 packages and dry cleaning.
 24 Q When you say you monitor the cameras, do
 25 you mean security cameras? 11:31:03

Page 9

3 (Pages 6 - 9)

<p>1 A Correct.</p> <p>2 Q What is involved in monitoring the cameras?</p> <p>3 A Well, we want to obviously protect the</p> <p>4 residents' safety, so we're just making sure that no</p> <p>5 one is coming in and out of the building that aren't 11:31:19</p> <p>6 supposed to and we just make sure that things are</p> <p>7 running smoothly.</p> <p>8 Q Let's back up.</p> <p>9 Where is the Eastern Columbia building</p> <p>10 located? 11:31:38</p> <p>11 A 849 South Broadway.</p> <p>12 Q And what is the Eastern Columbia building?</p> <p>13 A Condominium complex.</p> <p>14 Q How many units are in it?</p> <p>15 A 147. 11:31:46</p> <p>16 Q How many security cameras are in the</p> <p>17 building?</p> <p>18 A We just added more. So we have about 40.</p> <p>19 Q In the 2016 timeframe, approximately how</p> <p>20 many cameras were in the East Columbia building? 11:32:02</p> <p>21 A Around 20.</p> <p>22 Q Where are the cameras directed?</p> <p>23 Are they directed to common areas or to</p> <p>24 individual units, or how is it set up?</p> <p>25 A Common areas, there's three that are 11:32:15</p> <p style="text-align: right;">Page 10</p>	<p>1 I'd say like seven feet of hallway distance from the</p> <p>2 wall. It's in like a secure place. So we sit right</p> <p>3 behind the front desk and when residents come up to</p> <p>4 us, we stand and we greet them.</p> <p>5 Q At the front desk, are there monitors where 11:33:54</p> <p>6 you view the security cameras?</p> <p>7 A Correct.</p> <p>8 Q So if you're sitting at the front desk, you</p> <p>9 have monitors displayed in front of you?</p> <p>10 A Yes. Well, to the side. Like this 11:34:06</p> <p>11 (indicating). They were like this at the time</p> <p>12 (indicating).</p> <p>13 Q And do you watch the security camera</p> <p>14 footage as it's happening or can you go back later</p> <p>15 and look at something that happened at a prior time? 11:34:19</p> <p>16 A At that time you could go look at it for up</p> <p>17 to 26 days.</p> <p>18 Q Then what happened on day 27?</p> <p>19 A Then it starts over. So if you didn't save</p> <p>20 the file, then it would be removed from the system. 11:34:33</p> <p>21 Q As the concierge at the Eastern Columbia</p> <p>22 building sitting at the front desk, do you have an</p> <p>23 opportunity to interact with residents of the</p> <p>24 building?</p> <p>25 A Yes. Always. 11:34:47</p> <p style="text-align: right;">Page 12</p>
<p>1 located in the elevators, there's one facing the</p> <p>2 front desk, the entrances, dog run, mezzanine level,</p> <p>3 by the mailroom, exiting and entering the parking</p> <p>4 garage. They're in the lobby by the front door.</p> <p>5 Do you want to know -- I think I covered 11:32:54</p> <p>6 all of it.</p> <p>7 Q Okay. If you think of any more, just let</p> <p>8 me know.</p> <p>9 You've talked about monitoring the cameras.</p> <p>10 Do you physically work in the Eastern 11:33:05</p> <p>11 Columbia building?</p> <p>12 A I do, yes.</p> <p>13 Q When do you work there?</p> <p>14 A Monday through Friday.</p> <p>15 Q What are your hours? 11:33:12</p> <p>16 A At that time it was 8:00 to 4:00.</p> <p>17 Q When you say "at that time," you mean in</p> <p>18 2016?</p> <p>19 A Correct. 8:00 a.m. to 4:00 p.m.</p> <p>20 Q Where do you physically sit in the Eastern 11:33:22</p> <p>21 Columbia building when you're working?</p> <p>22 A At the front desk.</p> <p>23 Q Can you describe the layout of the front</p> <p>24 desk to us?</p> <p>25 A Sure. The front desk is -- there's about 11:33:30</p> <p style="text-align: right;">Page 11</p>	<p>1 Q In what situations do you interact with</p> <p>2 residents typically?</p> <p>3 A If they need something, if they're going to</p> <p>4 let us know about like a housekeeper or if they need</p> <p>5 to pick up their dry cleaning or their packages or 11:34:57</p> <p>6 personal items. If they want to leave something for</p> <p>7 us for someone else to pick up. If they need us to</p> <p>8 print something. If -- they're passing by, if</p> <p>9 they're exiting the building, we always see them and</p> <p>10 we greet them whether they're coming in or coming 11:35:16</p> <p>11 out.</p> <p>12 Q During your work at the East Columbia</p> <p>13 building, did you become aware that Johnny Depp and</p> <p>14 Amber Heard were residents of the building?</p> <p>15 A Yes. 11:35:28</p> <p>16 Q Do you know what unit they lived?</p> <p>17 A Penthouse 3.</p> <p>18 Q During what period of time did you</p> <p>19 understand that they were residents of the building?</p> <p>20 A Right when they moved in. I think it was 11:35:37</p> <p>21 2015.</p> <p>22 Q And at what point did they cease to be</p> <p>23 residents in the building?</p> <p>24 A Well, Amber would come down. He never</p> <p>25 really did. She would come down and walk by us and 11:35:54</p> <p style="text-align: right;">Page 13</p>

<p>1 talk to us, and so it was obvious that they were 2 living there. And her friends were living there as 3 well. 4 Q "Her friends" being who? 5 A Raquel Pennington and Josh. 11:36:05 6 Q I think you anticipated one of my next 7 questions. You said that Ms. Heard would come down 8 and interact with you. 9 How many times would you say that you 10 interacted with Ms. Heard in person when she was a 11:36:18 11 resident? 12 A Oh, a lot. 13 Q When you say "a lot," was it more than ten 14 times? 15 A Yes. 11:36:36 16 Q More than 20 times? 17 A Yes. 18 Q More than 50 times? 19 A Yes. 20 Q More than 100 times? 11:36:40 21 A I wouldn't -- I'm not going to say that. 22 Q Somewhere between 50 and 100 times you 23 interacted with Ms. Heard in person? 24 A Correct. 25 Q Other than interacting with Ms. Heard in 11:36:51 Page 14</p>	<p>1 the incident occurred -- or the alleged incident 2 occurred. 3 Q When you say "the alleged incident," what 4 are you talking about? 5 A The fight that was reported to occur. 11:38:12 6 Q Okay. Let's unpack that a little bit. 7 A Okay. 8 Q First of all, when are we talking about? 9 What year is this you're talking about? 10 A 2016. 11:38:27 11 Q What month? 12 A May. 13 Q Do you know a specific date in May? 14 A The 21st. 15 Q So what did you learn supposedly happened 11:38:34 16 on May 21st, 2016? 17 A I just know the police were called. My 18 employee called me and said the police were called 19 to Penthouse 3. 20 Q Who is your employee that called you? 11:38:52 21 A Gaylynn Sumerland. 22 Q Is she still your employee? 23 A Yes. 24 Q How did she become aware that the police 25 had been called? 11:39:01 Page 16</p>
<p>1 person, did you also observe her on security 2 cameras? 3 A Yes. 4 Q How many times would you say you observed 5 Ms. Heard on security cameras? 11:36:59 6 A Too many to count, really. 7 Q You had mentioned that Mr. Depp didn't come 8 down as much as she did. 9 Did you ever interact with Mr. Depp during 10 your employment at the Eastern Columbia building? 11:37:13 11 A I saw him one time in person. 12 Q Was that in the lobby area? 13 A I was in the package room and he was going 14 up -- he had just escorted her out and then I was 15 getting a phone call, so I exited the package room 11:37:35 16 and he was standing there and then I went to go get 17 the phone call. 18 Q At some point in time did you become aware 19 that Ms. Heard and Mr. Depp were going through a 20 divorce? 11:37:48 21 A Yes. 22 Q When did you become aware of that? 23 A Amber told me. 24 Q When was that? 25 A I believe Friday, it was -- Friday after 11:37:55 Page 15</p>	<p>1 A The police came to the front desk and said 2 that they needed to get -- they needed access to the 3 penthouse level. 4 Q And your employee Gaylynn gave them access? 5 A Correct. 11:39:12 6 Q This was on May 21st, 2016? 7 A Correct. 8 Q After May 21st, 2016, did you have any 9 interactions with Ms. Heard or Mr. Depp? 10 A Yes. 11:39:23 11 Q Can you tell me about those interactions? 12 A I saw Ms. Heard on Monday, Tuesday, 13 Wednesday and Friday that week. 14 Q Did you have any conversations with her 15 about the police coming to the penthouse? 11:39:34 16 A Not about the police. 17 Q What conversations did you have with her? 18 A On Monday she came down to discuss 19 something with me and then on Tuesday something as 20 well. Just minor. On Wednesday she needed me to 11:40:01 21 give her keys to a housekeeper. 22 Q Okay. And after Wednesday -- when you say 23 "Wednesday," are we talking about May 25th, 2016? 24 A That is correct. 25 Q So after Wednesday, did you have any 11:40:23 Page 17</p>

<p>1 additional interactions with Ms. Heard?</p> <p>2 A I did. I saw her on Friday.</p> <p>3 Q Backing up.</p> <p>4 When you saw Ms. Heard on the Monday, which</p> <p>5 was May 23rd -- 11:40:35</p> <p>6 A Uh-huh.</p> <p>7 Q -- did she have any visible injuries to her</p> <p>8 body?</p> <p>9 A No.</p> <p>10 Q Did she have any bruises on her face? 11:40:41</p> <p>11 A No.</p> <p>12 Q Any cuts on her face?</p> <p>13 A No.</p> <p>14 Q Any signs of having been hit or struck in</p> <p>15 any way? 11:40:49</p> <p>16 A No.</p> <p>17 Q What about when you saw Ms. Heard on</p> <p>18 Tuesday, did she have any visible injuries on her</p> <p>19 body?</p> <p>20 A No. 11:40:55</p> <p>21 Q Any signs of being hit or struck?</p> <p>22 A No.</p> <p>23 Q Any bruises?</p> <p>24 A No.</p> <p>25 Q What about when you saw Ms. Heard on 11:41:00</p> <p style="text-align: right;">Page 18</p>	<p>1 sort of allegations about what caused those marks?</p> <p>2 A Yes. Later.</p> <p>3 Q What did you hear later?</p> <p>4 A Well, she was going to go file a domestic</p> <p>5 violence restraining order. 11:42:05</p> <p>6 Q How did you learn that she was going to go</p> <p>7 file a domestic violence --</p> <p>8 A Online.</p> <p>9 Q Online.</p> <p>10 You heard in the media that Ms. Heard was 11:42:12</p> <p>11 filing a restraining order?</p> <p>12 A Correct. And she told me on Friday that</p> <p>13 she was getting a divorce.</p> <p>14 Q So you saw her for several days in a row</p> <p>15 without any visible injuries; correct? 11:42:25</p> <p>16 A Correct.</p> <p>17 Q Then on Friday, May 27th, she suddenly has</p> <p>18 injuries to her face; is that right?</p> <p>19 A Correct.</p> <p>20 Q Did that strike you as odd? 11:42:34</p> <p>21 A I did -- I asked her if she was okay.</p> <p>22 Q Did you have any conversations with anyone</p> <p>23 in the building about what may have been going on at</p> <p>24 that time?</p> <p>25 A Yes. 11:42:47</p> <p style="text-align: right;">Page 20</p>
<p>1 Wednesday, May 25th, 2016, did she have any injuries</p> <p>2 on her body?</p> <p>3 A No.</p> <p>4 Q Did she have any signs of bruises?</p> <p>5 A No. 11:41:09</p> <p>6 Q Or having been hit or struck?</p> <p>7 A No.</p> <p>8 Q What about when you saw her on Thursday,</p> <p>9 May 26th?</p> <p>10 A I didn't see her on Thursday. 11:41:16</p> <p>11 Q Okay. Fair enough. Thanks for clarifying</p> <p>12 that.</p> <p>13 Did you see her again on Friday, May 27th?</p> <p>14 A Yes.</p> <p>15 Q At that point in time, did she have any 11:41:24</p> <p>16 injuries to her body?</p> <p>17 A Yes.</p> <p>18 Q Can you describe what those injuries looked</p> <p>19 like?</p> <p>20 A Yes. She had a red cut underneath her 11:41:30</p> <p>21 right eye and red marks by her eye.</p> <p>22 Q Did you ever ask her what caused those</p> <p>23 marks?</p> <p>24 A No.</p> <p>25 Q At some point in time did you hear some 11:41:47</p> <p style="text-align: right;">Page 19</p>	<p>1 Q Can you describe those conversations.</p> <p>2 A I asked other associates if they had seen</p> <p>3 anything on her face when they interacted with her.</p> <p>4 Q And what did they say?</p> <p>5 A No. 11:43:04</p> <p>6 Q Who were those other associates that you</p> <p>7 asked?</p> <p>8 A Alex, Cornelius.</p> <p>9 Q What is Alex's full name?</p> <p>10 A Alex Romero. 11:43:15</p> <p>11 Q And what about Cornelius?</p> <p>12 A Cornelius Harrell.</p> <p>13 Q Had they interacted with Ms. Heard in the</p> <p>14 week between May 21st and May 27th as well?</p> <p>15 A Yes. 11:43:26</p> <p>16 Q Can you describe your conversations in a</p> <p>17 little bit more detail with them?</p> <p>18 A Cornelius text me on Sunday because he was</p> <p>19 really excited that he had met her and he said, oh,</p> <p>20 my God, I just met Amber Heard. 11:43:40</p> <p>21 Q Uh-huh.</p> <p>22 What else did he say?</p> <p>23 A I said, isn't she lovely?</p> <p>24 And he said, yes.</p> <p>25 Q Did you later have a separate conversation 11:43:56</p> <p style="text-align: right;">Page 21</p>

1 with Mr. Harrell about whether or not Ms. Heard had
2 marks on her face when he interacted with her?
3 A Yes.
4 Q When was that conversation?
5 A I think the following week that he worked. 11:44:08
6 Q Do you recall when that was?
7 A The Sunday after the previous Sunday.
8 Q So around the 29th of May?
9 A Correct.
10 Q And can you walk us through that 11:44:23
11 conversation, what you said to Mr. Harrell, what
12 Mr. Harrell said to you.
13 A I asked him if on Sunday if he saw a mark
14 on her face, and he said no.
15 Q And that was the Sunday, the day after the 11:44:37
16 police came; is that right?
17 A Correct.
18 Q Who else did you talk to other than
19 Mr. Harrell?
20 A The general manager and Alex and Gaylynn. 11:44:46
21 Q Let's take those one by one. Let's start
22 with Alex.
23 When did you talk to Alex?
24 A I talked to Alex when it was surfacing
25 that -- when the picture had surfaced online that 11:45:07
Page 22

1 she had a mark on her face.
2 Q When you say "the picture," can you be a
3 little bit more specific?
4 A The picture that was posted of the alleged
5 incident of-- 11:45:19
6 Q Okay. So are we talking around Friday, the
7 27th of May at this point?
8 Is that when the picture was posted, or was
9 it later?
10 A Oh, maybe it was -- I'm not sure when the 11:45:32
11 picture was posted.
12 Q But something became public that caused you
13 to inquire of Alex about whether he had seen similar
14 marks on her face; is that right?
15 A I asked if he had encountered with her, 11:45:45
16 yes.
17 Q Did he have encounters with her that week?
18 A Yes.
19 Q Can you describe what he told you about
20 those encounters? 11:45:54
21 A He told me that her and Raquel asked him to
22 come upstairs to their loft and look to see if
23 anyone was inside because they were nervous or
24 scared.
25 Q Did he indicate what day that was? 11:46:10
Page 23

1 A I believe it was Wednesday.
2 Q Wednesday, May 25th?
3 A It was either -- I believe it was
4 Wednesday, yes.
5 Q Did he indicate to you that when he talked 11:46:21
6 with and interacted with Ms. Heard on May 25th, that
7 she had any marks or cuts or bruises on her face?
8 A No. He said he didn't see anything.
9 Q You mentioned you also talked with Gaylynn.
10 Can you describe that conversation? 11:46:38
11 A I asked Gaylynn if she had seen -- what had
12 happened, if she had seen them after the police
13 came, and she said no.
14 Q But I just want to tie all this up and make
15 sure I'm following what you're saying. 11:46:55
16 You had interacted with Ms. Heard for
17 several times between May 23rd and May 27th?
18 A Correct.
19 Q Alex had interacted with Ms. Heard some
20 time during that week as well; yes or no? 11:47:06
21 A Yes.
22 Q And Cornelius Harrell had interacted with
23 Ms. Heard on May 22nd, the day after the police
24 came; correct?
25 A Yes. 11:47:17
Page 24

1 Q So through all of those interactions when
2 the three of you talked, what conclusion did you
3 come to?
4 That was a bad question. Let me withdraw
5 it. 11:47:34
6 So the three of you all had interactions
7 with Ms. Heard in that week and what was your --
8 what did you all observe about her face in those
9 interactions with her?
10 A That it did not occur on Saturday. 11:47:47
11 Q What did not occur on Saturday?
12 A Whatever happened to her face did not
13 happen on Saturday.
14 Q And for the course of -- let me back up.
15 During that same time period, that May 21st 11:48:12
16 through the 27th time period, in addition to
17 interacting with Ms. Heard in person, did you also
18 observe Ms. Heard on the security tapes?
19 A Yes.
20 Q How did she appear on the security tapes? 11:48:26
21 A Fine.
22 Q "Fine" meaning what?
23 A She was happy and normal.
24 Q Did she have any visible injuries to her
25 face? 11:48:40
Page 25

1 A No.

2 Q At some point in time -- I want to skip a
3 little bit ahead now -- were you involved with
4 taking footage from the security cameras and
5 providing it to Mr. Depp's divorce lawyers? 11:48:55

6 A Yes.

7 Q When was that?

8 A They had asked for, I believe, 72 hours of
9 the footage. And so the general manager asked me to
10 start downloading it, but later took over the 11:49:12
11 process.

12 Q Do you recall who you interacted with on
13 behalf of Mr. Depp at that time?

14 A Pardon me?

15 Q Do you recall which lawyers or people 11:49:23
16 working for the lawyers you interacted with?

17 A Yes. His attorneys came in after, I
18 believe, we were subpoenaed -- I don't remember all
19 that "indepthly."

20 Q Do you recall any of the names of the 11:49:50
21 lawyers you worked with?

22 A Yes. Can you just ask me a couple of the
23 names?

24 Q Sure.

25 Do you recall anyone from the Bloom Hergott 11:50:07
Page 26

1 law firm?

2 A Well, his attorney and his attorney's
3 assistant came in to look at the footage at one
4 point.

5 Q Do you recall which law firm they were 11:50:23
6 from?

7 Was it Laura Wasser? Patty Glaser? Blair
8 Burke?

9 A Yes, Laura Wasser and Blair Burke.

10 Q Were the lawyers you dealt with? 11:50:38

11 A Yes.

12 Q And --

13 A One of them came. I don't know if they
14 were both together. I just don't recall. I know
15 one of them came to the building, maybe both of them 11:50:48
16 came to the building the first day and then only one
17 of them came back.

18 Q Do you recall if you pointed them to
19 specific footage that you thought would be helpful?

20 A Yes. 11:51:02

21 Q Tell me about that.

22 A I just briefly mentioned a couple times
23 that they should check.

24 Q What were those times, if you recall?

25 A I don't recall. I just said... 11:51:21
Page 27

1 Q Why did you think those would be helpful
2 times?

3 If you don't recall the times, we can talk
4 more about the content.

5 A There was a lot to look at, so -- and this 11:51:35
6 was before my general manager told me that I
7 couldn't say anything about the footage, so I was
8 just kind of -- I thought I was being helpful, but I
9 didn't know I wasn't supposed to be helpful.

10 Q Okay. I'm not sure I'm following you. 11:51:52

11 A Because we hadn't talked to our attorneys
12 yet.

13 Q Okay. I see.

14 But you were trying to be helpful. What
15 information did you give to the attorneys who were 11:52:03
16 there on behalf of Mr. Depp?

17 A There was some footage of Amber and her
18 sister and Raquel coming back from dinner.

19 Q Can you describe what you remember about
20 that footage? 11:52:22

21 A Her sister pretended to punch her in the
22 face.

23 Q Do you recall what day of the week that
24 was?

25 A Tuesday. 11:52:30
Page 28

1 Q Tuesday, May 24th, 2016?

2 A Correct.

3 Q Was that -- let me back up a second.
4 So when the lawyers came in and looked at
5 the footage, did they copy a particular footage? 11:52:43
6 How did they go about identifying what they
7 wanted to take?

8 A They had someone else come and go look
9 through all the footage on their behalf afterwards,
10 because they did do a steady day or two themselves 11:52:57
11 and I think our -- our camera systems were like
12 pretty slow, so it's really time consuming, so they
13 hired someone to come in and find the footage that
14 they needed, from my understanding.

15 Q Okay. And then once they found the footage 11:53:17
16 that they needed, what happened?

17 Was that copied?

18 How did it work?

19 A I think that they were looking for footage
20 for any time that like they saw Amber or whatnot. 11:53:27
21 And then yeah, it was copied. Yes, it was copied
22 and given to them.

23 Q Do you know if they took --

24 A I don't think they saw that. I don't think
25 they knew what I was talking about in the mezzanine 11:53:41
Page 29

1 when I had mentioned, oh, I saw her here and I saw
2 her here.
3 Q So you don't believe that was among the
4 footage that they collected?
5 A I don't think they -- it was so quick, that 11:53:52
6 I had said, oh -- it was so quick, that I had told
7 them I don't think they knew what they were looking
8 for.
9 Q And for the footage that wasn't collected,
10 what happened to that footage? 11:54:10
11 A It all gets erased after 26 days.
12 Q So -- go ahead.
13 I didn't mean to interrupt you.
14 A It's fine.
15 Q So we actually have some of the footage 11:54:30
16 that was collected and we can go through that, but I
17 want to take a quick break and get that set up
18 before we start looking at specific clips and we can
19 talk about those and the context of your
20 interactions with Ms. Heard. 11:54:43
21 A Great.
22 MS. BILES: Go off the record briefly.
23 THE VIDEOGRAPHER: Going off the record at
24 11:54 a.m.
25 ///

Page 30

1 (Whereupon, a recess was held
2 from 11:54 a.m. to 12:00 p.m.)
3 THE VIDEOGRAPHER: Going back on the record
4 at 12:00 p.m.
5 BY MS. BILES: 12:00:12
6 Q Ms. Esparza, so we have 87 video clips that
7 we subpoenaed that were the video clips that were
8 collected by the divorce lawyers in the divorce
9 case. I have some of those here today.
10 I would like to show them to you so you can 12:00:28
11 explain them to us and let us know what it is you
12 saw in the videos and how they match up with your
13 own interactions.
14 MS. BILES: So the first one we're going to
15 mark this as Exhibit 204 A. 12:00:42
16 (Whereupon, Plaintiffs' Exhibit 204 was
17 marked for identification by the
18 Court Reporter.)
19 BY MS. BILES:
20 Q Can you describe what you're seeing here on 12:00:53
21 this video clip?
22 A That is me behind the desk. There's a
23 package on a cart. There's our middle elevator and
24 the hallway that residents walk through to get to
25 their units. 12:01:22

Page 31

1 Q Is this the front desk that you described
2 in your prior testimony?
3 A Yes.
4 Q Can you tell by looking at this video clip
5 when this surveillance footage was shot? 12:01:31
6 A Yes.
7 Q When was it?
8 A May 25th at approximately 1:42 p.m.
9 Q This was during your normal workday?
10 A Yes. 12:01:47
11 Q And you appear to be sitting at the desk
12 during work of some sort.
13 When you describe the work that you've
14 done -- that you do at the Eastern Columbia
15 building, is this what you do, you sit at this front 12:01:58
16 desk and manage whatever is going on in the building
17 for the residents?
18 A Yes.
19 Q I'm going to attempt to fast forward a bit,
20 but before I do that, I believe you testified 12:02:11
21 earlier about an interaction that you had with
22 Ms. Heard involving a key for a housekeeper.
23 A Correct.
24 Q Can you tell us more about that
25 interaction? 12:02:23

Page 32

1 A Yes. She came down to ask me to give her
2 housekeepers her key to her unit.
3 Q And that was on Wednesday, May 25th?
4 A Yes.
5 Q I'm going to fast forward, if I can. I 12:02:38
6 believe that interaction you've described is
7 actually depicted on this video, so let me see if I
8 can get to it.
9 I want you to take a look at the video and
10 let me know what you see as it continues to play. 12:03:02
11 A Fed Ex guy dropping off a package. He
12 hands me the device to sign for the package.
13 Q Are you on the phone?
14 Is that a cell phone that you're holding?
15 A No. I'm on the work phone. 12:03:26
16 Q So there's a landline phone there?
17 A Yes. Two lines.
18 Q Do you recognize that person?
19 A Yes.
20 Q Who is that? 12:03:44
21 A That's Amber Heard.
22 Q Is this the interaction that you described
23 about the key for the housekeeper?
24 A Yes.
25 Q Is that her handing you the key? 12:03:57

Page 33

1 A She is handing me the key.
2 Q At this point in time, to your knowledge,
3 was Ms. Heard wearing makeup?
4 A No.
5 Q In your interactions with her, how often 12:04:13
6 did she appear to wear makeup?
7 A Never.
8 Q On this Wednesday, May 25th, did she have
9 any visible marks on her face?
10 A No. 12:04:23
11 Q Approximately how far from her in this
12 video were you when she was handing you the key?
13 A We were very close. Arm's length.
14 Q Other than this interaction that you had
15 with Ms. Heard, I think you described other 12:04:41
16 interactions with her and seeing her other times on
17 the security footage; is that right?
18 A Yes.
19 Q So let's see if we can locate some of those
20 other videos. 12:04:54
21 I think you testified, and correct me if
22 I'm wrong, that there are security cameras in the
23 elevators in the Eastern Columbia building; is that
24 right?
25 A Yes. 12:05:09

1 Q Is that all of the elevators?
2 A Yes. Except for the parking.
3 Q So the elevator going to the penthouse
4 where Mr. Depp and Ms. Heard lived had a security
5 camera in it? 12:05:23
6 A Correct.
7 Q Does this appear to be that elevator?
8 A Yes.
9 Q So I'm going to -- and what date was this
10 footage taken? 12:05:34
11 A May 25th, 2016, at 1:46 p.m.
12 Q Is this approximately the same time that
13 you interacted with Ms. Heard about the housekeeper
14 key?
15 A Yes. 12:05:47
16 Q Bear with me while I fast forward a bit.
17 THE VIDEOGRAPHER: I think that's not --
18 that's not a fast forward.
19 MS. BILES: Got it.
20 BY MS. BILES: 12:06:21
21 Q I see a PH there.
22 Does that mean it's the elevator stop for
23 the penthouse?
24 A Correct.
25 Q So that was the stop for Mr. Depp and 12:06:28

1 Ms. Heard's apartment?
2 A Yes.
3 Q Looks like the elevator is going up.
4 Do you recognize that person?
5 A Yes. 12:06:59
6 Q Who is that?
7 A Amber and her interior designer and Raquel
8 Pennington.
9 Q Can you identify which is which? Which one
10 is Raquel Pennington and which one is the interior 12:07:12
11 designer?
12 A The interior designer Laura Divenere is on
13 the left and Raquel Pennington is directly in front
14 of Amber.
15 Q The one who is getting on the elevator with 12:07:21
16 a drink in her hand?
17 A Correct.
18 Q And Ms. Pennington lived in the building
19 also; right?
20 A Yes. 12:07:28
21 Q What about the interior designer?
22 A No. Oh, she did. I don't know if she was
23 still living there at that point. No, she had
24 recently moved.
25 Q We have a frontal shot of Ms. Heard's face 12:07:40

1 in this video.
2 Is that consistent with how she looked when
3 she came up to the desk to give you the key?
4 A Yes.
5 Q In this video, are there any marks on 12:07:58
6 Ms. Heard's face that are visible?
7 A No.
8 Q Is there any indication that she had been
9 struck or hit by a person or an object?
10 A No. 12:08:09
11 Q It looks like she's holding the key in her
12 hand. I'm assuming this is right before she comes
13 to give it to you.
14 Is that how these cameras would be set up,
15 where you could see the sequence of events, if you 12:08:23
16 looked at all the cameras together?
17 A Yes.
18 MS. BILES: And this is going to be 204 B
19 in case I didn't say that.
20 Up next we have 204 C. 12:08:46
21 BY MS. BILES:
22 Q Ms. Esparza, what is the date that this
23 footage was recorded?
24 A May 25th, 2016.
25 Q What is depicted in this surveillance 12:09:00

1 video?
2 A It was -- that was just the penthouse
3 elevator opening at the mezzanine level.
4 Q Okay. Let me see if I can skip a bit
5 ahead. 12:09:19
6 This is showing the comings and goings of
7 various residents of the building, I assume; is that
8 right?
9 A Correct.
10 Q Do you recognize that woman? 12:10:23
11 What about that man?
12 A Yes. Alex.
13 Q Let's see if we can get a better shot of
14 the woman.
15 Where is the elevator stopping? 12:11:23
16 A Penthouse.
17 Q How many penthouse units were there in the
18 building?
19 A There's PH 1 through PH 5. Then there's
20 1211 and 1212 which also -- and 12- -- yeah. Those 12:11:36
21 two go up to that level, too. They have two patios
22 over there. And 1210. But only five.
23 Q In 2016, other than Mr. Depp and Ms. Heard
24 and Raquel Pennington and her fiance, was anyone
25 else living on the penthouse? 12:12:03
Page 38

1 A Yes. Isaac was living in PH 2 and
2 previously in the year her sister was living there
3 as well.
4 Q When you say "her sister," who are you
5 referring to? 12:12:12
6 A Whitney Heard.
7 Q Amber Heard's sister Whitney?
8 A Correct.
9 Q And who was Isaac?
10 A Isaac is one of Johnny's friends. He was 12:12:20
11 one of their mutual friends. He's an artist.
12 Q I think we're almost where we need to be.
13 Do you recognize this resident?
14 I'm assuming she's a resident.
15 Do you recognize her? 12:13:20
16 A Yes.
17 Q Who is that?
18 A She used to -- I think -- I thought that
19 was the lady that used to live in 707, but now I
20 don't think so. 12:13:35
21 Q Maybe we'll get a better shot.
22 Do you recognize that woman, either of
23 them?
24 A There's her sister Whitney. I've seen
25 them, but I don't know who they are. 12:14:48
Page 39

1 Q Which one is her sister Whitney?
2 A In the middle.
3 Q In the black coat?
4 A Yes.
5 Q And the people that you said you've seen 12:14:56
6 but you don't know who they were, which ones are
7 those?
8 A The two people in front of her. I don't
9 know if that's IO or AO. I don't think so, though.
10 Q Did you see them in the building or did you 12:15:09
11 see them with Ms. Heard?
12 A Yeah. I've seen them in the building
13 before.
14 Q Who's outside the elevator?
15 A Amber Heard. 12:15:20
16 Q What does she appear to be doing?
17 A There's Raquel.
18 She's looking in her purse for something
19 and has something in her mouth.
20 Q Now, do you recognize the woman now that we 12:15:37
21 have a facial shot of her?
22 A I don't know her name.
23 Q What, if anything, do you know about her?
24 A I just seen her come to visit.
25 Q Who did she come visit? 12:15:57
Page 40

1 A Amber.
2 Q And let's pause right -- let me back up and
3 pause for one moment.
4 A Oh, that's IO -- or what's her name?
5 Q I'm sorry. Who? 12:16:13
6 A It's like IO or AO.
7 Q Who is that?
8 A She's one of her friends. She's a writer.
9 Q Thank you for being patient with my video
10 handling. 12:16:34
11 Okay. You described earlier a point in
12 time on Friday, May 27th, when Ms. Heard had some
13 sort of cut or mark on her face; is that right?
14 A Right.
15 Q Where was that located on her face? 12:16:52
16 A On her right eye and cheek.
17 Q Is that part of her face visible in this
18 May 25th, 2016, surveillance video?
19 A Yes.
20 Q You can clearly see her right cheek and 12:17:05
21 face?
22 A Yes.
23 Q Is the same mark that you described seeing
24 on Friday, May 27th, visible on her face --
25 A No. 12:17:15
Page 41

1 Q -- in this video?
2 And the way Ms. Heard looks in this video,
3 is that the same or different from how she looked
4 when you talked with her at the front desk on
5 May 25th? 12:17:27
6 A It's the same.
7 Q And at any point if you recognize any of
8 these people, let me know.
9 A It's Raquel and her sister and IO.
10 Q Which one is IO, the hat girl, or this one? 12:17:50
11 A The short haired one.
12 Q How do you spell IO?
13 A A-O or I-O or something.
14 I'm not 100 percent positive that's her,
15 but it looks like her. But then she cut her hair 12:18:11
16 later, so I don't -- yeah, it's her. That's her.
17 Sorry.
18 Q Where are they in the building right now?
19 A They're on the mezzanine level.
20 Q What is on the mezzanine level? 12:18:25
21 A The mailroom and the exit to the parking.
22 Q So there was an attached parking garage?
23 A Correct.
24 Q And what time is showing on this video?
25 A 1921, so is that 7:21? 12:18:42

1 Oh, no. I was right. 7.
2 Q So where are they exiting?
3 A They're exiting the penthouse elevator to
4 the mezzanine level.
5 Q And if you go right on the mezzanine level, 12:19:19
6 are you going to one particular place, or is it
7 always --
8 A You can go to the mailroom and then you can
9 go to the parking garage elevator and you can go to
10 the top level parking spaces. 12:19:38
11 Q So those are clips that we have from
12 Wednesday, May 25th, 2016. We also have some clips
13 from earlier in the week, May 24th, 2016.
14 I believe you testified that you had some
15 interactions with Ms. Heard earlier in the week as 12:20:01
16 well; is that right?
17 A Yes.
18 Q In addition to interacting with her, did
19 you go back and view security footage?
20 A Yes. 12:20:13
21 Q When did you do that?
22 A On Friday, I believe.
23 Q Friday, May 27th --
24 A Yes.
25 Q -- 2016? 12:20:32

1 What prompted you to go back and review
2 security footage on Friday, May 27th, 2016?
3 A The mark on her face.
4 Q Why did the mark on her face prompt you to
5 go back and look at security footage? 12:20:53
6 A Can you rephrase that question?
7 Q Sure.
8 You testified that you went back and looked
9 at security footage on Friday, May 27th because of
10 the mark that you saw on Ms. Heard's face. 12:21:30
11 Did I understand that part right?
12 A Yes.
13 Q So my --
14 A I'm not sure that was the day. I knew I
15 went back several times. 12:21:41
16 Q When you say "several times," approximately
17 how many times did you go back and look at security
18 footage?
19 A Of different instances -- probably 10, 15
20 times. 12:21:55
21 Q Why were you doing that?
22 A Because of the allegations.
23 Q What about the allegations made you want to
24 go back and look at security footage?
25 A Because it didn't -- the time didn't add up 12:22:13

1 and so I was questioning it.
2 Q When you say you were questioning it, I
3 just want to make sure for the record that we're
4 clear on what exactly you were questioning.
5 A The mark on her face and the allegations 12:22:32
6 that were made.
7 Q So I'm trying to think of a way to phrase
8 this.
9 So why were you questioning the mark on her
10 face and the allegations that were made? 12:22:51
11 A Because I saw her several times and I
12 didn't see that on her face.
13 Q And so what were you thinking about that?
14 A That the allegations were false.
15 Q When you went back and looked at security 12:23:10
16 footage 10 to 15 times, did that change your belief
17 that the allegations were false?
18 A No.
19 Q When you looked at the security footage 10
20 or 15 times, what did you then think about 12:23:28
21 Ms. Heard's allegation that she had been assaulted
22 by Mr. Depp?
23 A It was false.
24 Q I want to go back and look at some more
25 video from May 24th, 2016. 12:23:42

1 Is that you at the front desk?
2 A Yes.
3 Q Do you recognize that resident?
4 A Yes.
5 Q Who is that resident? 12:23:54
6 A Amber.
7 Q That's Amber?
8 A Isn't it? Oh, that's her sister Whitney.
9 I think.
10 Let me check. Can you go back? 12:24:04
11 Q Sure.
12 A Sorry. I wasn't paying attention.
13 Q That's okay. I've done that several times
14 with them, too. They're practically twins.
15 A Yeah, that's Amber. 12:24:22
16 Q So what date was this filmed?
17 A This was May 24th, 2016.
18 Q What is she doing in this video?
19 A Someone had dropped something off for her,
20 and so I let her know and she came down to pick it 12:24:47
21 up.
22 Q She came down to the front desk to pick it
23 up?
24 A Yes.
25 Q Was she wearing makeup at that time? 12:24:52
Page 46

1 A No.
2 Q Approximately how far away from her were
3 you?
4 A Like -- very close. Like my arm -- like
5 two feet. 12:25:07
6 Q When she came to pick up her package, did
7 you see any marks on her face? Cuts? Bruises?
8 A No.
9 Q Did you see anything that suggested that
10 she had been hit by a person or an object or 12:25:16
11 anything?
12 A No.
13 Q So that was 204 D.
14 Let's go to 204 E.
15 What is this footage of? 12:25:47
16 A The elevator.
17 Q Which elevator?
18 A Penthouse elevator.
19 Q When was this shot?
20 A May 24th, 2016. 12:25:57
21 Q And there's a resident. Let's see if we
22 can get to the right part of this.
23 What time of day is this?
24 A It was evening. It would be 2117, so 9:17.
25 Q Do you recognize that person? 12:26:42
Page 47

1 A Yes.
2 Q Who is that?
3 A Whitney, Raquel and Amber.
4 Q Do you have a clearer shot of Amber's face
5 in this video? 12:26:53
6 A Yes.
7 Q Do you see -- what side of her face do you
8 see?
9 A Right.
10 Q Do you see any marks, bruises or cuts on 12:26:59
11 her face?
12 A No.
13 Q What part of Amber's face is visible in
14 this video?
15 A Her ear, right side of her face, cheek, and 12:27:40
16 eye.
17 Q Do you see any marks, cuts or bruises?
18 A No.
19 Q Later in the week on approximately May 27th
20 when Ms. Heard did have marks or bruises or cuts on 12:27:52
21 her face, were they located in the part of her face
22 that's now visible on this video?
23 A Yes.
24 Q So looking at this video from May 24th,
25 there's no marks or cuts or bruises there? 12:28:07
Page 48

1 A Correct.
2 Q And I think you identified these other
3 people as Whitney Heard over by the elevator panel;
4 is that right?
5 A Yes. 12:28:26
6 Q And then who is the other woman?
7 A Raquel Pennington.
8 Q At this point were both Raquel Pennington
9 and Whitney Heard residents of the building?
10 A Just Raquel. 12:28:39
11 Q Whitney Heard has been in a lot of these
12 videos.
13 Was she a frequent guests of Amber's?
14 A Yes.
15 Q Did Amber have any other frequent guests 12:28:49
16 when she was a resident of East Columbia?
17 A Yes.
18 Q Can you identify guests that you recall
19 seeing?
20 A Her friend IO, Laura Divenere, Samantha -- 12:28:58
21 I forget some of the other people's names.
22 Q Okay. I think all of those people that you
23 identified were female.
24 Did she have any male guests at any point
25 that you're aware of? 12:29:24
Page 49

1 A Yes.

2 Q Who were some of her male guests?

3 A She had a computer guy coming in, Elon

4 Musk.

5 Q Anyone else? 12:29:38

6 A One guy with long shaggy hair that I don't

7 know his name.

8 Q Let's back up and take those one by one.

9 You mentioned a computer guy.

10 How do you know he was a computer guy? 12:29:57

11 A Because she dropped off her computer and he

12 picked up her computer from me.

13 Q So he wasn't a guest in her apartment; is

14 that right?

15 A He did go up to her apartment. 12:30:08

16 Q When was that?

17 A The following week.

18 Q The following week of May -- the last week

19 of May 2016; is that right?

20 A Correct. 12:30:18

21 Q Okay. You mentioned Elon Musk. When was

22 Mr. Musk a guest of Amber Heard at East Columbia?

23 A After she had filed for divorce.

24 Q When was that?

25 A That I know of. 12:30:31

Page 50

1 Q When do you recall specifically seeing

2 Mr. Musk as a guest?

3 A I believe I fobbed him up. If you have

4 guests, they have to be sent up with a key fob. The

5 elevators, you can't just press a button without it. 12:30:50

6 Q When do you recall fobbing up Mr. Musk?

7 A The following week.

8 Q "The following week" meaning the last week

9 of May 2016?

10 A I'm not a 100 percent certain. I know it 12:31:02

11 was within -- it could have been -- it was in a

12 very -- it was in either of those two weeks.

13 Q "Either of those two weeks," meaning the

14 week of the 21st onward or the following week after

15 the 27th? 12:31:26

16 A Correct. I think there were several times.

17 Q When you fobbed Mr. Musk up to Ms. Heard's

18 penthouse, how long did he stay, do you know?

19 A I fobbed him to his car, so he had come

20 down and he needed to get back to the mezzanine 12:31:44

21 level where his car was parked.

22 Q I see.

23 Did you observe how long he had been a

24 guest in her penthouse?

25 A I don't know. 12:31:55

Page 51

1 Q You mentioned a third person, a shaggy

2 haired guy.

3 Who was the shaggy haired guy?

4 A I think he was a makeup artist or

5 something. Or like a design -- clothing -- she had 12:32:08

6 some people come -- this was prior to the incident.

7 Yeah.

8 Q Going back to Mr. Musk.

9 What time of day was it when you fobbed

10 him? 12:32:22

11 A The morning.

12 Q The morning.

13 Was it when you first went to work or was

14 it later in the day?

15 A It was relative -- it was probably 12:32:31

16 9:00 o'clock. 9:30, maybe.

17 Q And that was on a weekday?

18 A Correct.

19 Q Do you recall if it was more towards the

20 beginning of the week or more towards the end of the 12:32:41

21 week?

22 A Tuesday, Wednesday.

23 Q Of either the week of the 21st or the week

24 of the 28th?

25 A Correct. 12:32:55

Page 52

1 Q Do you recall seeing Mr. Musk visit

2 Ms. Heard at other times?

3 A Yes.

4 Q When were those times?

5 A I know -- there are many times. 12:33:07

6 Q In relation to the time when Ms. -- when

7 Ms. Heard appeared with the visible marks on her

8 face, did Mr. Musk visit her at any time around that

9 date?

10 A Yes. 12:33:29

11 Q Can you tell me what you recall about that?

12 A I can't exactly recall if it was -- I feel

13 like it was -- I might have seen him on camera on a

14 Thursday. I remember...

15 Q When you say you might have saw him on a 12:34:06

16 camera, do you recall which camera you think you saw

17 him on?

18 A Well, it was after I -- the penthouse

19 elevator camera.

20 Q And you think -- 12:34:24

21 A In the mezzanine area.

22 Q When do you think that was in relation to

23 when Ms. Heard appeared with these marks on her

24 face?

25 A After. 12:34:35

Page 53

1 Q After. Okay.

2 You mentioned that you had seen Mr. Musk at

3 the Eastern Columbia building many times.

4 Do you recall when the first time you saw

5 Mr. Musk in the building was? 12:34:56

6 A It was the first time that I fobbed him to

7 his car.

8 Q Is that the time you just described, May of

9 2016?

10 A Correct. 12:35:13

11 Q Before you personally saw Mr. Musk in the

12 Eastern Columbia building, had you heard from anyone

13 else that they had seen him in the building?

14 A Yes.

15 Q Tell us about that. 12:35:24

16 A Alex told me that he had been visiting her.

17 Q When you say "Alex," are you talking about

18 your employee Alex?

19 A Alex is not my employee. He works for the

20 building, for Action Property Management. 12:35:42

21 Q But it's Alex Romero?

22 A Correct.

23 Q When do you recall Alex Romero telling you

24 that he had seen Mr. Musk visiting Ms. Heard?

25 A Well, he mentioned it to me yesterday. 12:35:57

Page 54

1 Q Okay. But earlier in time, had he

2 mentioned that to you?

3 A Yes.

4 Q When had he mentioned it to you before?

5 A I asked him -- I told him that I -- I told 12:36:10

6 him that I fobbed Elon up this morning and I asked

7 him if he had seen him before.

8 Q So this conversation between you and Alex

9 took place in May of 2016?

10 A Yes. 12:36:35

11 Q On whatever day it was that you fobbed

12 Mr. Musk to his car?

13 A Yes.

14 Q When you ask Mr. Romero if he had seen

15 Mr. Musk in the building before, what did he tell 12:36:44

16 you?

17 A He said yes.

18 Q Can you tell us everything you remember

19 about it?

20 A He said that he saw him last night. 12:36:50

21 Q "Last night" meaning --

22 A He had came the night before.

23 Q I see.

24 From your conversation with Mr. Romero, was

25 it your understanding that you let Mr. Musk out of 12:37:02

Page 55

1 the building in the morning and Mr. Romero had let

2 him into the building the night before?

3 A He had told me that Amber called to open

4 the garage gate for him.

5 Q For who? 12:37:17

6 A Her friend Elon.

7 Q I see.

8 Other than the conversation that you've

9 just described with Mr. Romero, were there any other

10 times that Mr. Romero indicated to you that he had 12:37:28

11 seen Mr. Musk in the building?

12 A Yes.

13 Q Can you tell us about those times?

14 A He just mentioned that she had her friend

15 Elon come over. 12:37:48

16 Q When you say "he," are you talking about

17 Alex?

18 A Alex, yes.

19 Q When did Alex mention that to you?

20 A I can't recall. 12:37:57

21 Q Do you recall if it was before or after the

22 conversation that you described for May of 2016?

23 A After.

24 Q After. Okay.

25 A But he did mention that he'd seen him there 12:38:12

Page 56

1 previously.

2 Q When he said that he had seen him

3 previously, when was he talking about, to your

4 understanding?

5 A When Johnny hurt his finger, which is 12:38:25

6 like...

7 Q Okay. Can you unpack that and tell me a

8 little bit about what you're talking about.

9 A Alex said that she started having Elon come

10 over and that he thought it was a little messed up 12:38:43

11 because Johnny was away and he didn't know what was

12 going on.

13 Q When was that?

14 A After he had hurt his finger.

15 Q Do you recall when that was? 12:38:56

16 A 2015, like...

17 Q So it's your understanding from Alex that

18 Alex had seen Mr. Musk visiting Ms. Heard in the

19 Eastern Columbia building in 2015?

20 A Yes. 12:39:22

21 Q Let's go back and look at some additional

22 video. We're on 204 E, I believe.

23 What is this footage showing?

24 A This is the penthouse elevator.

25 Q What is the date? 12:40:07

Page 57

1 A May 24th.
2 Q Who's getting on this elevator?
3 A Amber, Raquel and her sister.
4 Q I'm going to pause it there.
5 Is that Amber standing with her back to the 12:40:24
6 elevator doors?
7 A Yes.
8 Q Is her face visible in this video?
9 A Yes.
10 Q What is the date of this video again? 12:40:33
11 A May 24th, 2016.
12 Q At what time?
13 A 11:18 p.m.
14 Q What part of Ms. Heard's face is visible in
15 this video? 12:40:46
16 A Her right side.
17 Q Do you see any marks or cuts or bruises on
18 the right side of her face on this?
19 A No.
20 Q Is that the same part of her face visible 12:40:55
21 that later in the week she appeared with marks or
22 bruises on?
23 A Yes.
24 Q And there is a full frontal shot of her
25 face. 12:41:10

Page 58

1 Q When you say he looked tired or like he had
2 just woken up, what led you to conclude that?
3 A His hair was messy.
4 Q Anything else?
5 A No. 12:42:38
6 Q Let's take a look at another video. This
7 is 204 F.
8 What is this footage of, Ms. Esparza?
9 A Penthouse elevator.
10 Q And what is the date of this? 12:43:00
11 A May 22nd, 2016.
12 Q And what time is it?
13 A 1:06 p.m.
14 Q Who is that?
15 A That's Amber. 12:43:09
16 Q Let's back up for a second.
17 In relation to when the police were called
18 to the penthouse --
19 A Yes.
20 Q -- when was this footage shot? 12:43:18
21 A The next day.
22 Q There's a shot of Ms. Heard's face.
23 Do you see her face clearly?
24 A Yes.
25 Q Do you see any marks or cuts or bruises on 12:43:30
Page 60

1 Do you see any signs of injury to her face?
2 A No.
3 Q Do you see any signs that she's been hit or
4 struck by a person or an object?
5 A No. 12:41:20
6 Q Is that consistent with how Ms. Heard
7 looked the week of -- after May 21st and your
8 interactions with her?
9 A Yes.
10 Q Where are they getting off? 12:41:32
11 A Penthouse.
12 Q And is that the elevator stop for
13 Ms. Heard's apartment?
14 A Yes.
15 Q Going back to when you encountered Mr. Musk 12:41:48
16 in the Eastern Columbia building in May of 2016. I
17 think you said it was around 9:00 in the morning
18 when you were at work; is that right?
19 A Yes.
20 Q What was his physical appearance like at 12:42:12
21 that time?
22 A He looked tired or like he just woke up.
23 Q What was he wearing?
24 A Something casual. Just like a T-shirt and
25 pants. 12:42:27

Page 59

1 her face?
2 A No.
3 Q Do you see any indication that she has been
4 hit or struck?
5 A No. 12:43:39
6 Q Let's see where she's going.
7 I believe you testified earlier that on
8 May 22nd, your employee Cornelius had an interaction
9 with Ms. Heard; is that right?
10 A Yes. 12:44:24
11 Q So this footage is shot the same day that
12 Mr. Harrell interacted with her?
13 A Yes.
14 Q Do you recall about what time of day it was
15 when he texted you and excitedly told you he met 12:44:32
16 her?
17 A I don't recall the time.
18 Q Do you recall what time --
19 A It was like -- I forget what time. I know
20 I -- I think it was like -- 12:44:45
21 Q Is that her again?
22 A Yeah, it is. So this was about the time.
23 Q Was he working at around 1:00 o'clock that
24 day?
25 A Correct. Yeah, it was 1:00 o'clock that he 12:44:56
Page 61

1 did. 1:15 he text me.
2 Q Is that her again?
3 A Yes.
4 Q And she has some packages in her hands it
5 looks like? 12:45:05
6 A Yes.
7 Q Where was she getting back on the elevator
8 from?
9 A The lobby.
10 Q Okay. Let's look at another video. 12:45:18
11 What is this footage of?
12 A The hallway by the package room.
13 Q Pause for one second.
14 This is 204 F.
15 MR. WRENSHALL: Isn't it G? 12:45:45
16 MS. BILES: I may have lost track.
17 204 G.
18 BY MS. BILES:
19 Q What is this footage of?
20 A The hallway, the package room, the 12:45:58
21 bathroom, the general manager's door. There's
22 Cornelius and Amber.
23 Q Let me back that up.
24 Where is the package room in this shot?
25 A To the right. The far right. 12:46:11

Page 62

1 Q The very bottom door?
2 A Correct.
3 Q What was Cornelius's job on May 22nd?
4 A He was a concierge.
5 Q Did he sit at the front desk where you sit 12:46:25
6 during the week?
7 A Yes.
8 Q I saw a head pass.
9 Is that Mr. Harrell and Ms. Heard?
10 A Yes. 12:46:41
11 Q How big is the package room?
12 A It's not very big. It's about -- I'd say
13 about -- say like this table to the wall, so like
14 eight feet by -- I don't know -- 15.
15 Q If two people are in the package room 12:47:18
16 together, how close to each other are they
17 typically?
18 A Very close.
19 Q Who is that that you see at the bottom of
20 the screen? 12:47:32
21 A Amber.
22 Q Who is that?
23 A Cornelius.
24 Q I guess we're on to H now.
25 What is this footage of camera 13? 12:48:06

Page 63

1 A It's the mezzanine level, the entry -- the
2 doors that come into the mailroom and go to the
3 parking.
4 Q And what date was this footage shot?
5 A May 22nd, 2016. 12:48:21
6 Q Who is that in the footage?
7 A Amber.
8 Q Where is she going?
9 A To the parking garage.
10 Q And what time is this? 12:48:29
11 A 1:03 p.m.
12 Q There's someone else about to walk through.
13 That's why we're still looking. I want to see if
14 you can help me identify the person or recognize
15 him. 12:48:53
16 Do you recognize that person?
17 A Yes.
18 Q Who is that?
19 A Jay Fagnano.
20 Q Is he a resident in your building? 12:49:30
21 A Yes.
22 Q Let me go back. Okay.
23 What is this footage of?
24 A Penthouse elevator.
25 Q And when was this shot? 12:49:58

Page 64

1 A May 22nd.
2 Q Is that a resident of the building?
3 A Yes.
4 Q To go to and from the penthouse, is this
5 the only elevator? 12:50:23
6 A Well, you can go -- you can use the other
7 elevators, you just have to take the stairs.
8 Q I see. This is the only one that goes
9 directly from the lobby to the penthouse?
10 A Yes. 12:50:36
11 Q Bear with me. I'm trying to get to the
12 right spot.
13 What time of day is this on May 22nd?
14 A 6:19.
15 Q When in relation to the police being called 12:51:08
16 to the penthouse was this footage shot?
17 A The next day.
18 Q Who is that?
19 A Amber.
20 Q Is she going up or down? 12:51:39
21 A She's going up.
22 Q So in these video clips, how does Amber
23 appear to you?
24 A Fine.
25 Q Does she -- in your observations of her 12:52:08

Page 65

1 over the time she lived in the Eastern Columbia
2 building, did she appear in these video clips to be
3 acting the same or different from how she typically
4 acted?
5 Let me rephrase the question. 12:52:31
6 You've interacted with Ms. Heard a lot when
7 she lived in the Eastern Columbia building; is that
8 right?
9 A Yes.
10 Q And you also observed her a lot on the 12:52:40
11 security videos; is that right?
12 A Yes.
13 Q In the videos that we've been watching
14 today that date from May 22nd, 2016 to May 25th,
15 2016, does she appear to be acting the way she 12:52:54
16 normally acted or does she appear to be acting
17 differently?
18 A Little different.
19 Q In what way?
20 A Little frazzled. 12:53:06
21 Q How so?
22 A She was -- interacting with her friends a
23 lot, going up and down a little bit more than usual.
24 Q Well, can we determine from looking at the
25 videos that were selected because she was in them, 12:53:40
Page 66

1 whether she was going up and down more than usual,
2 or is it just that we're looking at videos of her?
3 A Maybe.
4 Q So she's --
5 A Yeah. I don't know. Sorry about that. 12:53:52
6 Q And the same thing with the friends, how
7 often did you normally see Ms. Heard with Raquel
8 Pennington?
9 A I would see Raquel every day and I would
10 see -- I didn't see them together that often. 12:54:12
11 Q What about Ms. Heard and her sister, how
12 often were they together?
13 A Again, I would see Whitney by herself when
14 she was here and not -- not -- it was -- not that
15 often. 12:54:40
16 Q Who did you see Ms. Heard with the most
17 when you saw her with someone else?
18 A Laura Divenere.
19 Q I think you said that's her interior
20 decorator? 12:55:06
21 A Uh-huh.
22 Q Did you frequently see Ms. Heard with
23 anyone else other than Laura Divenere?
24 A I saw her more alone. And IO.
25 Q IO being the person you think is a writer? 12:55:26
Page 67

1 A Uh-huh.
2 Q Okay. Let's look at video I, 204 I.
3 What is this a footage of?
4 A Two residents going to the pool.
5 Q What is the -- 12:55:53
6 A May 22nd.
7 Q Of what year?
8 A 2016.
9 Q What is the security camera aimed on?
10 A The penthouse elevator. 12:56:01
11 Q What time of day is it?
12 A 1836. So 6:36.
13 Q Where is the elevator stopped?
14 A Penthouse level.
15 Q Do you recognize that person? 12:56:33
16 A Yes.
17 Q Who is that?
18 A Josh.
19 Q Josh?
20 A Raquel's fiancé. 12:56:37
21 Q Who is the other person on the elevator?
22 A Amber.
23 Q What does she appear to be doing in the
24 video?
25 A Talking on the phone. 12:57:00
Page 68

1 Q What is she doing now?
2 A Exiting the elevator.
3 Q At what level?
4 A The lobby.
5 Q Next we're on -- I'm marking this as 204 J. 12:57:27
6 What is this a shot of?
7 A The penthouse elevator.
8 Q What's the date?
9 A May 22nd, 2016.
10 Q And what's the time? 12:57:42
11 A 2251. So 8:51.
12 Q In relation to when the police were called
13 to the penthouse, when was this footage shot?
14 A The next day.
15 Q Who is that? 12:58:12
16 A Amber.
17 Q Where is she going, can you tell?
18 A The lobby. Mezzanine level.
19 Q What is on the mezzanine level?
20 A The parking garage and the mailroom. 12:59:02
21 Q What time is this in the video?
22 A 8:56 p.m. -- no. Wait.
23 It's 10:56 p.m.
24 Q So almost 11:00 p.m.?
25 A Yeah. 12:59:23
Page 69

1 Q Who is that?

2 A A male.

3 Q Is that Ms. Heard?

4 A Yes. A male with a hat on looking down.

5 Q Now what are they doing? 12:59:48

6 A They're touching heads.

7 Q Is this someone you recognize?

8 A Not at this angle.

9 Q Let's back up and see if we can get him

10 again. Just missed him getting on. 01:00:01

11 Recognize?

12 He appears to be keeping his head down,

13 doesn't he?

14 A Correct.

15 Q Are the cameras visible in the elevator? 01:00:33

16 A Yes.

17 Q So if you were getting on the elevator,

18 would you see a camera?

19 A Yes.

20 Q Where would you see the camera? 01:00:43

21 A In the right-hand corner.

22 Q In your experience watching the security

23 video, do people tend to keep their heads down when

24 they get on?

25 A No. 01:01:05

Page 70

1 Q Do you recall what day it was?

2 Maybe we can go back and take a look at

3 that clip.

4 A It was on Tuesday at 11:00 o'clock, I

5 think. 01:02:37

6 Q Okay. Do you think it might have been

7 video 36?

8 Let's try that one, which I've lost track

9 where my marking is.

10 Is that 204 D, maybe? 01:02:49

11 Does that look right?

12 Like the right camera, the right time?

13 A No. It's too early. It was later.

14 Q Let's try this one.

15 A This looks accurate. 01:03:18

16 Q So what time is this?

17 A 11:18.

18 Q So you see them getting on the elevator

19 here; right?

20 A Correct. 01:03:37

21 Q So when did the fake punch occur in

22 relation to this?

23 A Right before they entered the elevator.

24 Q So you were looking at security camera

25 footage from outside the elevator; is that right? 01:03:53

Page 72

1 Q Have you seen people trying to avoid the

2 security cameras before?

3 A Yes.

4 Q Can you give us some examples of when you

5 have seen that? 01:01:17

6 A Just now.

7 Q So looking at that on the video that we

8 just saw after having seen a lot of videos of

9 security footage from security cameras in this

10 building, what is your takeaway when you see how

11 they entered the elevator? 01:01:29

12 A They were trying to hide.

13 Q Let's go back to a couple of things.

14 We watched videos, a fair number of them in

15 which Ms. Heard is in and they were -- and which her

16 sister was in. 01:01:55

17 Earlier when you first arrived and first

18 started testifying today, you described a video

19 where you saw in the video Ms. Heard's sister fake

20 punching her. 01:02:10

21 Can you tell us more about that since it

22 isn't one of the ones we have here to look at?

23 A It's before one of the elevator clips when

24 they were coming back when Raquel had a bottle of

25 wine in her hand. 01:02:25

Page 71

1 A Correct. When they were walking in from

2 the mezzanine doors.

3 Q Can you describe what you saw, who was

4 where?

5 A Amber was behind her sister and her sister

6 turned around -- turned around and like went like

7 that to her face (indicating), and then she started

8 laughing. 01:04:03

9 Q Who started laughing?

10 A They all did. 01:04:18

11 Q Who was in the group?

12 A Raquel, Whitney and Amber.

13 Q Did Amber's sister make contact with her

14 face?

15 A No. 01:04:30

16 Q What else were they doing at that time,

17 other than pretending to hit each other?

18 A They were laughing and...

19 Q Did Amber pretend to hit anyone or --

20 A Just Whitney. 01:04:44

21 Q Just Whitney.

22 Did Whitney pretend to hit Raquel?

23 A Just her sister.

24 Q Just her sister Amber.

25 Where did she pretend to hit her? 01:04:52

Page 73

1 A Like -- at her face.
2 Q Any particular part of her face?
3 A Her head.
4 Q The top of her head? The bottom of her
5 head? Can you be more specific? 01:05:06
6 A It was like in front of her face.
7 Q In front of her face. I see.
8 Other than the fake punch and the laughing,
9 do you recall anything else about the video?
10 A No. 01:05:16
11 Q Is this the video that you said you
12 identified when you were trying to be helpful but
13 didn't realize that you were not supposed to be?
14 A Yes.
15 Q In the video where Whitney Heard was 01:05:33
16 pretending to hit Amber Heard, how did Amber's face
17 look at that point?
18 A Normal.
19 Q She didn't have any marks on her face at
20 that time? 01:05:46
21 A No.
22 Q This was before the marks appeared on her
23 face?
24 A Yes.
25 Q The security cameras in the building, are 01:05:59
Page 74

1 they all at the angle -- not the angle, the distance
2 that we've been looking at today, or do you have the
3 ability to zoom in or zoom out?
4 A You can zoom in and zoom out.
5 Q On the video that you described of Whitney 01:06:17
6 Heard pretending to punch Amber Heard on the face,
7 did you ever zoom in on that or zoom out or change
8 the perspective?
9 A Yes.
10 Q Tell us about that, please. 01:06:31
11 A I showed the general manager the video.
12 Q Who was the general manager?
13 A Brandon Patterson.
14 Q When did you show him the video?
15 A The following week. 01:06:49
16 Q The last week of May 2016?
17 A Correct.
18 Q Why did you show the video to Brandon
19 Patterson?
20 A Because of the allegations. 01:07:04
21 Q What about the -- when you say "the
22 allegations," you mean the abuse allegations against
23 Mr. Depp?
24 A Yes.
25 Q Why did the abuse allegations against 01:07:19
Page 75

1 Mr. Depp make you show the video of Whitney Heard
2 fake punching Amber Heard to the general manager of
3 the building Brandon Patterson?
4 A Because I was thought it was wrong.
5 Q What did you think was wrong? 01:07:35
6 A That there was such a serious matter going
7 on and they were acting like that.
8 Q When you say "serious matter," what are you
9 talking about?
10 A Everything that was in the press. 01:07:51
11 Q Can you tell us more about what you
12 remember being in the press at that time?
13 A That Amber's filing a domestic violence
14 restraining order against Mr. Depp and later filing
15 for divorce. 01:08:05
16 Q Uh-huh. And so what about the video of
17 Whitney Heard pretending to punch Amber Heard, what
18 did you think was wrong about that?
19 A Well, I had known that Mr. Depp had left
20 the country on Saturday and did not return. 01:08:22
21 Q Saturday, May 21st, 2016?
22 A Correct.
23 Q Yes. I did not mean to interrupt you.
24 Keep on with your answer.
25 A And he did not return and so I was 01:08:33
Page 76

1 questioning how those marks got on her face on
2 Friday.
3 Q I see.
4 Because you hadn't seen them earlier in the
5 week? 01:08:46
6 A Yes.
7 Q Okay. So tell us about what you remember
8 happening next after the marks appeared on
9 Ms. Heard's face on Friday, May 27th, 2016.
10 A Someone had told the press that the front 01:08:59
11 desk had talked to someone and reported that none of
12 us saw any marks on her face, and so I was concerned
13 because that would mean that -- obviously all my
14 employees have to sign a confidentiality agreement,
15 so I was concerned, not only for my company, but for 01:09:25
16 the way that other residents would feel if they knew
17 that that was the truth.
18 Q I want to back up.
19 First of all, was it true or untrue that
20 none of the people who worked at the front desk had 01:09:42
21 seen any marks on Ms. Heard's face?
22 A It is true.
23 Q So that part of it you didn't have an issue
24 with because it was true?
25 A Right. 01:09:52
Page 77

1 Q So what concerned you about someone saying
2 publically that the front desk had reported not
3 seeing any marks on her?
4 A It just -- it was just concerning because I
5 didn't -- we didn't want to get involved. 01:10:13
6 Q When you say "we," who do you mean?
7 A I didn't want to get involved.
8 Q I see.
9 So do you know who told -- back up.
10 A I have an idea. 01:10:30
11 Q So was it publically reported in the media
12 that the front desk said they didn't see marks on
13 Amber's face?
14 A Correct.
15 Q Do you remember what media outlets reported 01:10:42
16 that?
17 A TMZ, I think.
18 Q So that concerned you.
19 What did you do when this reporting took
20 place? 01:10:54
21 A Nothing.
22 Q Did you talk to any of your employees about
23 it?
24 A Yes.
25 Q Who did you talk to? 01:11:04

Page 78

1 Q Did you talk to anyone else about it?
2 A King.
3 Q Who is King?
4 A He was at the time my overnight security
5 guard. 01:12:15
6 Q Had he seen her?
7 A No.
8 Q Did you talk with anyone else?
9 A No.
10 Q But between you and Cornelius Harrell and 01:12:23
11 Alex Romero and Brandon Patterson, all of you had
12 seen her at some point; is that right?
13 A Yes.
14 Q And none of you had seen the marks?
15 A Brandon saw her after the marks were there. 01:12:37
16 Q Among the people who saw her earlier in the
17 week, between May 21st and May 22nd -- May 26th I
18 mean, that was you, Alex and Cornelius; right?
19 A Yes.
20 Q None of you saw the marks? 01:12:56
21 A Correct.
22 Q So tell me more about this conversation
23 that all of you were having after someone had told
24 the media that you hadn't seen the marks.
25 A It was out there. We just kind of dropped 01:13:18

Page 80

1 A I was trying to figure out -- we all had an
2 idea that it was a woman that lived in the building
3 because she wanted to -- she was an attorney and so
4 she like spoke on TV and she's like, this is the
5 building that I live in, and so we just discussed 01:11:22
6 that she was probably the one that threw us under
7 the bus for publicity.
8 Q When you say "we," who are you talking
9 about?
10 A Alex. I was speaking with Alex. 01:11:33
11 Q Who was the woman?
12 A She's an attorney that lives in the
13 building.
14 Q Had you or Alex --
15 A But we're not sure about it, so... 01:11:43
16 Q Sure.
17 Had you or Alex talked with this woman?
18 A No.
19 Q Had you talked to anyone about not having
20 seen marks on Ms. Heard's face? 01:11:52
21 A Only amongst each other.
22 Q "Amongst each other" meaning?
23 A Brandon, Alex, Gaylynn, Cornelius.
24 Q Anyone else?
25 A Gaylynn didn't see her, though. 01:12:04

Page 79

1 it.
2 Q Okay. Did you ever have any conversations
3 with Ms. Heard about the marks?
4 A The "remarks"?
5 Q About the marks on her face? 01:13:30
6 A Just once on Friday I asked if she was
7 okay.
8 Q What about after it was publicly reported
9 that the front desk said they didn't see the marks,
10 did you have any conversations with Ms. Heard after 01:13:45
11 that?
12 A Yes.
13 Q Can you tell us about those conversations?
14 A I saw her coming down the elevator -- she
15 had called me and she needed to talk to me and 01:13:54
16 Brandon and asked if it was a good time, so I went
17 into Brandon's office and I told him that she's
18 coming down.
19 Q When you say she called you, did she call
20 you at the front desk landline? 01:14:08
21 A Yes.
22 Q Where is Brandon's office located in
23 relation to the front desk?
24 A It's in the hallway behind us.
25 Q What day was this? 01:14:18

Page 81

<p>1 A It was the following week and I feel like 2 it was Friday. 3 Q Okay. 4 A I'm not certain. It was at the end of the 5 next week. 01:14:39 6 Q So tell us about your conversation with 7 Ms. Heard and Brandon in Brandon's office. 8 A She asked us if the building -- if we could 9 talk to People magazine, one of her friends who 10 works at People magazine, and make a statement from 01:14:56 11 the building saying that we would not release any 12 confidential information to the press. 13 Q Okay. 14 A That we would -- we have never. 15 Q So she wanted you -- I just want to make 01:15:16 16 sure I'm following this. 17 She wanted you to talk to the press about 18 how you wouldn't talk to the press; is that right? 19 A She wanted us to help retract the statement 20 that was given to the press stating that the front 01:15:30 21 desk had released this information and she asked if 22 we would clarify it and let them know that we, in 23 fact, would never release that information on any 24 resident. 25 Q Okay. How did you take that? 01:15:44 Page 82</p>	<p>1 A And then I walked into Brandon's office and 2 I told her that she has to make a statement, and so 3 I stayed there so he could kind of guide me. 4 Q And how did that conversation play out 5 after she asked you to make a statement retracting? 01:16:56 6 A She just said, I have a friend at People 7 magazine. Can you talk to them? 8 And I said that I couldn't. And I said 9 that she can come down and talk to me and Brandon 10 about it. 01:17:14 11 Q Was it your understanding that People 12 magazine was running a story about her? 13 A No. 14 Q What was your understanding? 15 A That she wanted us to make a statement on 01:17:24 16 behalf of the building. 17 Q What was Brandon's response? 18 A No. You can talk to our lawyer. 19 Q Did you have any additional conversations 20 with Ms. Heard about this proposed statement at any 01:17:41 21 other time? 22 A No. 23 Q Did you end up making a statement to People 24 magazine? 25 A No. 01:17:51 Page 84</p>
<p>1 A We told her that she -- we told her that 2 she can talk to our attorney. 3 Q What did you think she was -- what did you 4 think her goals were based on the conversation? 5 A To retract the statement that the front 01:16:00 6 desk had seen her without any marks. 7 Q Did she ever talk to you about the 8 substance of the statement, that you had, in fact, 9 seen her without any marks? 10 A No. 01:16:17 11 Q So did she address that at all? 12 A No. 13 Q Tell me more about the friend at People 14 magazine. 15 Was there anything else she said about this 01:16:28 16 person? 17 A No. 18 Q Did she tell you when she wanted you to 19 talk to this friend at People magazine? 20 A She asked me if I would make a statement 01:16:37 21 over the phone -- 22 Q Okay. 23 A -- originally, and I told her that she can 24 talk to Brandon. 25 Q I see. 01:16:45 Page 83</p>	<p>1 Q Did the building end up making a statement 2 to People magazine? 3 A No. 4 Q Did you want to make a statement to People 5 magazine? 01:17:59 6 A No. 7 Q Why not? 8 Let's try it this way: The statement that 9 Ms. Heard was proposing that you make, that the 10 building would not have said they saw her without 01:18:17 11 marks on her face, were you comfortable making a 12 statement like that? 13 A No. 14 Q Putting aside whether you could or not, why 15 were you not comfortable making such a statement? 01:18:28 16 A Because that would have been a lie. 17 Q What about it would have been a lie? 18 A The front desk did, in fact, see her prior 19 to Friday without marks on her face. 20 Q Based on your interactions with Ms. Heard, 01:18:45 21 was it unusual for her to make a request like that 22 of you or Brandon to make some sort of a statement 23 on her behalf? 24 A Yes. 25 Q Had she ever done anything like that 01:19:02 Page 85</p>

1 before?
2 A No.
3 Q After you and Brandon directed her to the
4 building's lawyers, was there any follow up from her
5 on the statement? 01:19:14
6 A No.
7 Q Did you ever have any further conversations
8 with Ms. Heard about the statement?
9 A No.
10 Q What about the marks on her face? 01:19:21
11 A No.
12 Q What about her abuse allegations against
13 Mr. Depp?
14 A No.
15 Q What about her divorce from Mr. Depp? 01:19:27
16 A No.
17 Q Is there -- how long after May 2016 did
18 Ms. Heard continue to live in the Eastern Columbia
19 building?
20 A I believe it was over a year. 01:19:43
21 Q What about Mr. Depp, did he continue living
22 in the building?
23 A No.
24 Q In the time that Ms. Heard continued living
25 in the building, did you have any additional 01:19:55
Page 86

1 What other unusual interactions did you
2 have with Ms. Heard?
3 A I had a couple interactions with her when
4 she seemed like she was under the influence a little
5 bit. 01:21:33
6 Q When was that?
7 A I know there was one time that was around
8 Thanksgiving.
9 Q Okay. Can you tell us how that interaction
10 went? 01:21:45
11 A She just seemed very out of it and looked
12 very out of it and kind of upset and she was just
13 kind of a mess.
14 Q What led you to conclude that she was kind
15 of a mess? 01:22:09
16 A She was dropping things and swaying back
17 and forth.
18 Q Was she alone?
19 A Yes.
20 Q And how did you come to interact with her? 01:22:15
21 A She came downstairs and she needed me to
22 fob her to the mezzanine, and I remember being
23 worried that she was going to drive in that state.
24 Q And this was around Thanksgiving of 2016?
25 A Correct. 01:22:32
Page 88

1 interactions with her?
2 A Yes.
3 Q Was there anything unusual about those
4 interactions?
5 A Such as? 01:20:03
6 Q Did anything stand out in your mind about
7 other interactions that you had with her?
8 A Yes.
9 Q Can you tell us what stood out in your mind
10 about other interactions? 01:20:20
11 A One time she dropped her keys down the
12 elevator shaft and she had bruises on her neck and a
13 Band-Aid.
14 Q When was that?
15 A Couple weeks after. 01:20:33
16 Q After what?
17 A May 21st.
18 Q Was Mr. Depp in the building at that point?
19 A No.
20 Q Was he in the country at that point? 01:20:41
21 A No.
22 Q Did you ask Ms. Heard how she got those
23 bruises?
24 A No.
25 Q Did you -- strike that. 01:20:50
Page 87

1 Q Was Mr. Depp still living in the building
2 at that point?
3 A No.
4 Q What other unusual interactions did you
5 have with Ms. Heard, if any? 01:22:43
6 A I can't recall.
7 Q Going back to the bruises that you describe
8 seeing on Ms. Heard.
9 I think you said it was approximately two
10 weeks after she -- the May 21st incident when she 01:23:06
11 made the allegations against Mr. Depp; is that
12 right?
13 A Yes.
14 Q What did those bruises look like?
15 A Hand marks. 01:23:15
16 Q And where were they?
17 A On her neck.
18 Q Was Mr. Depp in the building at that point
19 in time?
20 A No. 01:23:24
21 Q To your knowledge, where was Mr. Depp?
22 A Out of the country.
23 Q Was there anyone else that she had been
24 interacting with during that period of time?
25 A Yes. 01:23:35
Page 89

1 Q Who had she been interacting with?
2 A Elon Musk.
3 Q Anyone else, to your knowledge?
4 A No.
5 Q When you say they were hand marks, how big 01:23:41
6 were the bruises?
7 A They were like fingers.
8 Q On her neck?
9 A Yes.
10 Q Which side of her neck? 01:23:52
11 A I can't recall.
12 Q How big were they?
13 A Like a quarter -- little less than
14 quarters.
15 Q How many were there? 01:24:12
16 A Two.
17 And then she had a mark, I think, on the
18 other side of her cheek.
19 Q "The other side of her cheek," which side
20 do you mean? 01:24:22
21 A The left.
22 Q So the opposite side of where the mark had
23 been before?
24 A Uh-huh.
25 Q This was -- again, was Mr. Depp in the 01:24:29
Page 90

1 country?
2 A No.
3 Q Other than those bruises, have you -- did
4 you ever see Ms. Heard with any other visible
5 injuries to her body when she was living in the 01:24:42
6 Eastern Columbia building?
7 A No.
8 MS. BILES: Let's take a quick break.
9 THE VIDEOGRAPHER: This marks the end of
10 media number 1. Going off the record at 1:24 p.m. 01:24:53
11 (Whereupon, a recess was held
12 from 1:24 p.m. to 1:37 p.m.)
13 THE VIDEOGRAPHER: This marks the beginning
14 of media number 2. Going back on the record at
15 1:37 p.m. 01:37:59
16 BY MS. BILES:
17 Q Ms. Esparza, earlier today you were talking
18 about the interactions that you had with Ms. Heard
19 in the week after May 21st, and I wanted to go back
20 to a couple of those. 01:38:12
21 You testified about the key interaction
22 which we saw in the video where she asked you to
23 give a key to the housekeeper; is that right?
24 A Yes.
25 Q What other times did you actually have 01:38:22
Page 91

1 conversations with Ms. Heard in that week?
2 A She asked -- she called me a couple times
3 and asked me to come outside because paparazzi was
4 out there, just her picking up things from me and
5 dropping things off for other people. 01:38:44
6 Q Do you recall any other specific
7 conversations that you had with her on Monday, May
8 23rd, 2016?
9 A I know she mentioned something to me about
10 her going to court. I can't recall correctly. 01:39:06
11 Q Was that when you talked to her on Friday,
12 May 27th, when she had the marks on her face and
13 told you she was getting a divorce, or was that some
14 other time?
15 A I don't recall when that was exactly. I 01:39:27
16 think she had said that a car was coming to get her.
17 She had called and said a car was coming, to let
18 them into the garage. She was worried about
19 paparazzi.
20 Q Are there any other conversations you 01:39:54
21 remember having with Ms. Heard that week?
22 A Just the normal conversations.
23 Q Let me back up and ask it this way: We
24 know you saw her in person on Wednesday the 25th,
25 because we saw the video of that with the key. 01:40:14
Page 92

1 A On Monday and Tuesday.
2 Q Then we saw a Tuesday video of her picking
3 up a package from you; is that right?
4 A Yes.
5 Q Are there any other in-person conversations 01:40:24
6 that you remember having with Ms. Heard that week?
7 A I don't remember exactly the context of the
8 conversations. I know I saw her Monday, Tuesday,
9 Wednesday and Friday, and I talked to her on the
10 phone on Thursday. 01:40:54
11 Q Going back to the time that you saw her
12 around Thanksgiving of 2016, when she appeared to be
13 under the influence, you said that Ms. Heard was
14 alone when you saw her -- or interacted with her
15 about the mezzanine. 01:41:20
16 To your knowledge, did she have any guests
17 at her penthouse at that time or were any residents
18 in the building visiting with her at that time?
19 A Yes.
20 Q What do you know about that? 01:41:31
21 A She had Cara Delevingne and Elon Musk there
22 the night of -- on Thanksgiving.
23 Q Of 2016?
24 A It was -- well, I guess it was the day
25 before Thanksgiving. 01:41:46
Page 93

1 Q What time of day was it when you saw her?
2 A I saw her in the morning.
3 Q And that's when you said that you were
4 concerned about her because she appeared to be under
5 the influence? 01:41:58
6 A Yes.
7 Q Did you see Ms. Delevingne or Mr. Musk that
8 same day?
9 A Not in person.
10 Q You said "not in person." 01:42:12
11 What about on the security cameras, did you
12 see them on the security cameras?
13 A Yes.
14 Q Can you tell us what you saw?
15 A I saw them going up and down the elevator 01:42:24
16 over and over again.
17 Q Was Ms. Heard with them?
18 A Yes.
19 Q What do you mean "going up and down the
20 elevator over and over again"? 01:42:39
21 A Car was going up and down and then Elon and
22 Amber were going up and down.
23 Q What time of day was that?
24 A Many times through the course of the night.
25 Q Were you at work that night or were you 01:42:57
Page 94

1 going back and looking at this later?
2 A I looked at it later.
3 Q What prompted you to look at that later?
4 A Because when I saw her, she was a little
5 out of it. 01:43:12
6 Q Were there other times when you saw
7 Ms. Heard when she appeared to be a little out of
8 it?
9 A Yes.
10 Q Can you tell us about those times? 01:43:28
11 A I just saw her a couple times where it
12 seemed like she had been drinking.
13 Q Going back to the elevator.
14 Were Ms. Delevingne, Mr. Musk and Ms. Heard
15 doing anything on the elevator or were they just 01:43:51
16 riding up and down?
17 I'm trying to visualize this.
18 A They were like pressing the button over and
19 over again and then they couldn't figure out how to
20 get back up, so they took the stairs, and then they 01:44:05
21 figured it out. I don't know.
22 Q Okay. It sounds like you have an
23 entertaining job.
24 Is there anything else about that incident?
25 A No. 01:44:31
Page 95

1 Q Going back to clarify one other thing.
2 You previously testified, correct --
3 A Yes.
4 Q -- on this subject matter; is that right?
5 A Yes. 01:44:44
6 Q Do you recall when you testified?
7 A I don't know the dates anymore. It was...
8 Q In relation to May 2016, when did you
9 testify before about Ms. Heard and observations of
10 her the week of May 21st, 2016? 01:45:01
11 A At a previous deposition.
12 Q Do you recall when that deposition was in
13 relation to your actual observations of her?
14 A Can I look in my phone and maybe --
15 Q Sure. 01:45:17
16 A Calendars do go back.
17 It was in July.
18 Q July of what year?
19 A 2016.
20 Q A couple months after May of 2016? 01:45:57
21 A Correct.
22 Q In your interactions -- backing up. Sorry.
23 In July of 2016, how did you come to
24 testify in a deposition?
25 A Laura Wasser and her partner had subpoenaed 01:46:21
Page 96

1 me and several other people at the front desk.
2 Q What was your impression of the work that
3 they were doing?
4 A I thought the questions were vague.
5 Q Did you tell them everything that you knew? 01:46:48
6 A I answered the questions as best to my
7 ability.
8 Q Did they ask you, in your opinion,
9 questions that aim to get all the information you
10 knew? 01:47:06
11 A No.
12 Q What makes you say "no"?
13 A I don't think they knew what to ask.
14 Q Why is that?
15 Why do you think that? 01:47:22
16 A Or I didn't understand what was going on
17 with the case, so I -- it just -- it seemed like
18 they decided that they were going to make an
19 agreement that our depositions weren't really going
20 to be involved. 01:47:50
21 Q Was there information that you had that you
22 gave to Mr. Dcupp's lawyers in the divorce case that
23 you didn't feel they used?
24 I'm trying to understand.
25 A No. 01:48:08
Page 97

1 Q Do you think there was information that you
2 had that they didn't obtain?
3 A Yes.
4 Q Can you explain that?
5 A Just the elevator thing. 01:48:17
6 Q "Elevator thing" --
7 A I mean, the fake punch thing.
8 Q Meaning what you testified to about Whitney
9 Heard?
10 A But they didn't ask me anything and it 01:48:30
11 wasn't my legal responsibility to give information
12 that wasn't asked of me.
13 Q I think I'm confused, because I thought you
14 testified earlier today that when they -- the
15 lawyers for Mr. Depp in the divorce first came and 01:48:46
16 started collecting videos that you told them to look
17 at --
18 A I mumbled a couple times and I told them
19 what cameras, but I don't think they heard me
20 correctly. 01:49:00
21 Q Okay. I see.
22 And so --
23 A So I don't think it's their fault.
24 Q I understand.
25 So why did you think that particular 01:49:08
Page 98

1 footage was so important of Whitney Heard pretending
2 to hit Amber Heard?
3 A Because of the allegations that were going
4 on about their argument on the 21st.
5 Q Can you explain that a little bit more so I 01:49:36
6 make sure I understand.
7 A She didn't have a mark on her face on
8 Monday, Tuesday, Wednesday, and she did on Friday.
9 On Tuesday night they were messing around, so it was
10 just peculiar. 01:49:58
11 MS. BILES: I think we're finished. I
12 don't think I have any further questions right now.
13 Thank you very much.
14 THE WITNESS: Thank you.
15 MR. WRENSHALL: I would like to ask a 01:50:08
16 couple questions, if you give me a brief break to
17 collect my thoughts.
18 MS. BILES: Of course.
19 THE VIDEOGRAPHER: Going off the record at
20 1:50 p.m. 01:50:19
21 (Whereupon, a recess was held
22 from 1:50 p.m. to 2:03 p.m.)
23 THE VIDEOGRAPHER: Going back on the record
24 at 2:03 p.m.
25 /// 02:03:05
Page 99

1 EXAMINATION
2 BY MR. WRENSHALL:
3 Q Good afternoon, Ms. Esparza.
4 I'm just going to ask you a couple
5 questions. 02:03:10
6 So did you meet with anyone prior to
7 appearing for your deposition today?
8 A No.
9 Q Did you discuss it with anyone?
10 A No. 02:03:20
11 Q So what was the date of the night the
12 police were called to the building?
13 A May 21st, 2016.
14 Q I think you previously testified Mr. Depp
15 left the country -- 02:03:29
16 A Yes.
17 Q -- on May 21st.
18 A That's what I was told, yes.
19 Q Do you know why the police were called to
20 the building? 02:03:34
21 A I believe someone called the police on
22 behalf of a noise complaint.
23 Q Did you discuss it with any of the building
24 employees or any of your employees?
25 A Not particularly, no. 02:03:49
Page 100

1 Q But you knew the police had come to the
2 building?
3 A Yes.
4 Q How did you know that Mr. Depp had left the
5 country? 02:03:56
6 A I text Kevin. I had said -- Kevin was one
7 of his -- I talked to Kevin and Andy frequently.
8 They work for Mr. Depp. And I had text them that
9 there was -- the police were called.
10 Kevin said, all good, and then they said 02:04:14
11 that he left.
12 Q What are Kevin and Andy's last names?
13 A Kevin I forget. And Andy is Milner.
14 Q You testified that Alex Romero --
15 Is that his last name? 02:04:40
16 A Yes.
17 Q -- had said that Amber and some of her
18 friends were scared on May 25th at the apartment?
19 A Don't quote me on the date, but it was
20 either Monday, Tuesday or Wednesday they said that 02:04:50
21 they were scared to go into the apartment -- they
22 were scared someone was in there and asked him to
23 come look and verify that no one was in there.
24 Q Did they tell Mr. Romero why they were
25 scared? 02:05:04
Page 101

1 A No.

2 Q When did you meet with Mr. Depp's attorneys
3 after the incident?

4 A The following week.

5 Q Do you remember the date? 02:05:17

6 A I don't remember.

7 Q So the week following as in --

8 A When they came to the property to subpoena
9 the footage. I'm not sure what date that is.

10 Q So the incident allegedly happened on the 21st; is that right? 02:05:29

11 21st; is that right?

12 A Correct.

13 Q It's not the week following the 21st?

14 A I believe it was the week after.

15 Q So the week of the 28th? 02:05:37

16 A I believe so.

17 Q Do you recall what day of the week it was
18 when they came?

19 A Possibly -- I'm not certain, so I don't
20 want to -- I'm not exactly sure what day it was. 02:05:52

21 Q You had testified that you recall Laura
22 Wasser coming to the building?

23 A I believe that was Laura Wasser and an
24 associate.

25 Q Was it Blair Burke? 02:06:09

Page 102

1 A I'm not sure which one is which and I know
2 they had another person working with them, so I'm
3 not exactly sure who came to the building.

4 Q It was either Laura Wasser or Burke?

5 A Or Blair. 02:06:22

6 Q You understood they were representing
7 Mr. Depp?

8 A Correct. It could have been Blair and
9 someone else, but I know someone that was
10 representing him -- two ladies came the first day 02:06:32
11 and then one lady -- two ladies came the second day
12 and one lady that was either Blair or Laura left.
13 She only stayed for a brief moment.

14 Q And then did you continue discussing with
15 the associate who had also come that day? 02:06:50

16 A No, I didn't, because Brandon talked to the
17 attorneys and he said that we're not allowed to --
18 we should not help them with anything. They need to
19 do their own investigation.

20 Q So that was the day of the first visit or 02:07:05
21 the day of the second visit?

22 A Second visit.

23 Q On the day of the first visit when you said
24 that two women --

25 A Had come. 02:07:15

Page 103

1 Q -- had come, and that was the day you said
2 you told them about certain portions of the tape?

3 A I tried to. It was definitely very quiet
4 when I said it.

5 Q Did you understand that they heard you? 02:07:26

6 A I think they took a couple little notes,
7 but it was so brief, that I don't think -- I don't
8 blame them for not seeing that tape if you asked me
9 that.

10 Q How brief was the interaction you had with 02:07:46
11 them?

12 A Like three -- two minutes.

13 Q Did you ever explicitly state that the
14 abuse allegations were false --

15 A No. 02:08:00

16 Q -- to either of these women?

17 A No.

18 Q Why not?

19 A Well, they're the attorneys, they're
20 supposed to figure that out themselves. 02:08:12

21 Q But you had told them to look at certain
22 footage; is that correct?

23 A I told them that I didn't see marks on her
24 face Monday, Tuesday, Wednesday, and I did on
25 Friday. 02:08:25

Page 104

1 Q And you told them to look at certain
2 footage?

3 A Quietly I had said that, yeah. I said a
4 couple times and I said, check the mezzanine camera,
5 check the PH elevator camera, just because I knew 02:08:37
6 there was a lot to look at.

7 Q Did you identify any specific dates or
8 times, though, that they should look at?

9 A I did. I said Tuesday night around
10 11:00 p.m. 02:08:49

11 Q But you're not sure if they heard you?

12 A Correct.

13 Q Did you tell Depp's attorneys about Elon
14 Musk?

15 A Yes. 02:09:01

16 Q Before your deposition in the divorce case,
17 had you met with Mr. Depp's attorneys?

18 A Just at the building. I talked to them,
19 but not met -- like we didn't have a conversation,
20 no. 02:09:19

21 Q So after Mr. Patterson told you you weren't
22 allowed to talk to Mr. Depp's attorneys --

23 A I didn't talk to them until the deposition.

24 Q You didn't meet with them before the
25 deposition? 02:09:30

Page 105

1 A No.		1 questions I have.	
2 Q Did you meet with Ms. Heard's attorneys at		2 Go off the record.	
3 any point --		3 THE VIDEOGRAPHER: Going off the record at	
4 A No.		4 2:12 p.m.	
5 Q -- between?	02:09:35	5 (Whereupon, a recess was held	
6 "No"?		6 from 2:12 p.m. to 2:15 p.m.)	
7 A She was at the deposition, though.		7 (Whereupon, a discussion was held	
8 Q You hadn't met with them beforehand?		8 off the record.)	
9 A No.		9 MR. WRENSHALL: D'Anne, can I get a rough	
10 Q Do you recall who took your deposition in	02:09:55	10 by Sunday?	02:12:18
11 the divorce case?		11 THE REPORTER: Do you need a rough, too?	
12 A I don't recall.		12 MS. BILES: Sure.	
13 Q Was it Ms. Wasser?		13 THE VIDEOGRAPHER: Going back on the record	
14 A I don't recall.		14 at 2:15 p.m.	
15 Q Do you recall if it was Ms. Burke?	02:10:17	15 MR. WRENSHALL: We're going back on the	02:15:32
16 A I can see if I -- no, I don't recall.		16 record.	
17 Q Was it a woman who took your deposition on		17 I'm going to ask one more question.	
18 Mr. Depp's behalf?		18 BY MR. WRENSHALL:	
19 A Yes.		19 Q Ms. Esparza, who was the person who took	
20 Q And you don't recall whether it was	02:10:30	20 your deposition, do you recall?	02:15:40
21 Ms. Wasser or Ms. Burke; is that the issue?		21 A Ms. Sutton.	
22 A I don't know who took the deposition. I		22 Q Do you remember her first name?	
23 forget. It was three years ago.		23 A I do not.	
24 Q But it was a woman?		24 Q Was she counsel for Mr. Depp or for	
25 A Yes.	02:10:41	25 Ms. Heard?	02:15:48
	Page 106		Page 108
1 Q Wasn't the name -- I'm sorry.		1 A I believe for Mr. Depp.	
2 You testified earlier about a general		2 MR. WRENSHALL: No further questions.	
3 manager.		3 MS. BILES: I offer the following	
4 A Uh-huh.		4 stipulation for the record:	
5 Q What is his name, or her name?	02:10:50	5 That the court reporter be relieved of	02:16:01
6 A Brandon Patterson.		6 responsibility with respect to the original	
7 Q That's Brandon's position, is general		7 transcript. The original transcript will be	
8 manager?		8 transcribed and signed by you under penalty of	
9 A Yes, sir.		9 perjury. The court reporter is going to send you a	
10 Q Did you ever communicate with any other	02:11:10	10 copy of the deposition transcript.	02:16:14
11 attorney for Mr. Depp?		11 Should we send it to your home address?	
12 A No.		12 THE WITNESS: Yes, please.	
13 Q Did you ever communicate with Jake Bloom?		13 MR. WRENSHALL: Can you say --	
14 A No.		14 THE WITNESS: 300 North El Molino Avenue,	
15 Q Did you ever communicate with any other	02:11:29	15 Unit 206, Pasadena, California 91101.	02:16:23
16 attorney at the Bloom Hergott law firm?		16 MS. BILES: Once you receive the	
17 A No.		17 transcript, is two weeks enough time for you to read	
18 Q Do you recall whether the testimony you		18 it and make any corrections, if necessary?	
19 gave in the divorce proceeding was designated as		19 THE WITNESS: Yes.	
20 confidential?	02:11:42	20 MS. BILES: We'll go ahead and send that to	02:16:36
21 A No.		21 your home address. Once you receive the transcript	
22 Q Do you remember signing anything regarding		22 from the court reporter, you'll have two weeks to	
23 the confidentiality in that case?		23 review it, make any corrections if you think they	
24 A I didn't.		24 are necessary, and you'll sign it. You will send it	
25 MR. WRENSHALL: I think those are all the	02:11:53	25 back to Brown Rudnick's office in Irvine,	02:16:53
	Page 107		Page 109

1 California. E-mail is fine.
 2 If we're not notified of any changes within
 3 the two weeks, the original will be deemed correct
 4 and signed.
 5 And the original transcript will be 02:17:08
 6 maintained by Brown Rudnick in Irvine, California
 7 and make it available at the time of any hearing in
 8 this matter.
 9 If the original transcript is not
 10 available, a certified copy of the same as corrected 02:17:22
 11 can be used for all purposes for which the original
 12 could be used.
 13 So stipulated?
 14 MR. WRENSHALL: So stipulated.
 15 THE REPORTER: Thank you. 02:17:34
 16 THE VIDEOGRAPHER: We're off the record at
 17 2:17 p.m. and this concludes today's testimony given
 18 by Trinity Corrine Esparza. The total number of
 19 media used was two and will be retained by Veritext
 20 Legal Solutions. Thank you. 02:17:50
 21 THE REPORTER: Do you need this transcript
 22 expedited?
 23 MR. WALDMAN: Yes.
 24 MS. BILES: By Monday.
 25 MR. WALDMAN: Yes. 02:19:07
 Page 110

1 THE REPORTER: Okay. Thank you.
 2
 3 (Whereupon the deposition proceedings
 4 were concluded at 2:19 p.m.)
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 Page 111

1 STATE OF CALIFORNIA)
) ss.
 2 COUNTY OF LOS ANGELES)
 3
 4
 5 I, TRINITY CORRINE ESPARZA, declare
 6 under penalty of perjury that the foregoing
 7 testimony is true and correct to the best of my
 8 knowledge and belief.
 9
 10 Dated this ___ day of _____, 2019.
 11
 12
 13
 14 (TRINITY CORRINE ESPARZA)
 15
 16
 17
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 Page 112

1 STATE OF CALIFORNIA)
 2 COUNTY OF LOS ANGELES) ss.
 3 I, D'Anne Moungey, C.S.R. No. 7872 in and
 4 for the State of California, do hereby certify:
 5 That prior to being examined, the witness
 6 named in the foregoing deposition was by me duly
 7 sworn to testify to the truth, the whole truth, and
 8 nothing but the truth;
 9 That said deposition was taken down by me
 10 in shorthand at the time and place therein named and
 11 thereafter reduced to typewriting under my
 12 direction, and the same is a true, correct, and
 13 complete transcript of said proceedings;
 14 That if the foregoing pertains to the
 15 original transcript of a deposition in a Federal
 16 Case, before completion of the proceedings, review
 17 of the transcript { } was { } was not required.
 18 I further certify that I am not interested
 19 in the event of the action.
 20 Witness my hand this January 28, 2019
 21
 22
 23
 24
 25
 Certified Shorthand Reporter
 For the State of California
 Page 113

[& - 8:00]

&	1:37 91:12,15	51:14 52:23 59:7	2:19 111:4
& 1:6,10 3:4 4:4 6:17 7:10	1:42 32:8	76:21 80:17 87:17	3
1	1:46 35:11	89:10 91:19 96:10	3 13:17 16:19
1 1:25 6:12 38:19 91:10	1:50 99:20,22	99:4 100:13,17	300 109:14
1-30 1:7	2	102:11,13	31 5:12
10 44:19 45:16,19	2 39:1 91:14	2211 2:17	310.201.0005 4:6
100 3:10 5:6 14:20	20 10:21 14:16	2251 69:11	310.424.3984 3:11
14:22 42:14 51:10	20005 2:12 3:6	22nd 24:23 60:11	310.734.5299 3:23
1000 3:10	20016 2:23	61:8 63:3 64:5	3195110 1:23
10:56 69:23	2015 13:21 57:16	65:1,13 66:14	355 3:16
1100 2:2 6:22	2016 10:19 11:18	68:6 69:9 80:17	36 72:7
113 1:25	16:10,16 17:6,8,23	23rd 18:5 24:17	4
11:00 69:24 72:4	19:1 29:1 35:11	92:8	40 10:18
105:10	37:24 38:23 41:18	24th 29:1 43:13	4:00 11:16,19
11:18 58:13 72:17	43:12,13,25 44:2	45:25 46:17 47:20	5
11:26 2:4 6:2,6	45:25 46:17 47:20	48:24 58:1,11	5 38:19
11:54 30:24 31:2	50:19 51:9 54:9	25 1:22 2:4 6:2	50 14:18,22
12 38:20	55:9 56:22 58:11	25th 6:6 17:23	500 4:5
1210 38:22	59:16 60:11 64:5	19:1 24:2,6 32:8	5163 2:22
1211 38:20	66:14,15 68:8	33:3 34:8 35:11	6
1212 38:20	69:9 75:16 76:21	37:24 41:18 42:5	600 2:12
12:00 31:2,4	77:9 86:17 88:24	43:12 66:14 92:24	601 2:11
13 63:25	92:8 93:12,23	101:18	680066 6:20
147 10:15	96:8,10,19,20,23	26 12:17 30:11	6:19 65:14
15 44:19 45:16,20	100:13	26th 19:9 80:17	6:36 68:12
63:14	2019 1:22 2:4 6:2	27 12:18	7
15th 3:5	6:6 112:10 113:20	27th 19:13 20:17	7 43:1
1836 68:12	6:6 112:10 113:20	21:14 23:7 24:17	700 3:5,22
1840 2:3	202.536.1763 2:13	25:16 41:12,24	707 39:19
18515 113:24	202.550.4507 2:23	43:23 44:2,9	72 26:8
1901 3:21 4:5	202.601.1602 3:6	48:19 51:15 77:9	7872 1:24 2:5
1921 42:25	204 5:12 31:15,16	92:12	113:3
1:00 61:23,25	37:18,20 47:13,14	28 113:20	7:21 42:25
1:03 64:11	57:22 60:7 62:14	28th 52:24 102:15	8
1:06 60:13	62:17 68:2 69:5	2900 3:17	8 5:5
1:15 62:1	72:10	29th 22:8	849 10:11
1:24 91:10,12	206 109:15	2:03 99:22,24	87 31:6
	2117 47:24	2:12 108:4,6	8:00 11:16,19
	213.457.8076 3:18	2:15 108:6,14	
	21st 16:14,16 17:6	2:17 110:17	
	17:8 21:14 25:15		

8:51 69:11	afternoon 100:3	76:2,17 94:22	area 15:12 53:21
8:56 69:22	ago 106:23	99:2 101:17	areas 10:23,25
9	agree 6:10	amber's 48:4,13	argument 99:4
90024 6:23	agreement 77:14	49:13 73:13 74:16	arm 47:4
90067 4:6	97:19	76:13 78:13	arm's 34:13
90067-6078 3:22	ahead 8:23 26:3	andy 101:7,13	arrived 71:17
90071 3:17	30:12 38:5 109:20	andy's 101:12	artist 39:11 52:4
901 3:5	aid 87:13	angeles 1:1 2:3	aside 85:14
90401 3:11	aim 97:9	3:17,22 4:6 6:1,19	asked 20:21 21:2,7
91101 109:15	aimed 68:9	6:23 112:2 113:2	22:13 23:15,21
92612 2:18	al 6:15,17	angle 70:8 75:1,1	24:11 26:8,9 55:5
949.752.7100 2:18	alex 21:8,10 22:20	answer 5:17 8:11	55:6 81:6,16 82:8
9:00 52:16 59:17	22:22,23,24 23:13	8:12,17,20,21 9:7	82:21 83:20 84:5
9:17 47:24	24:19 38:12 54:16	76:24	91:22 92:2,3
9:30 52:16	54:17,18,19,21,23	answered 97:6	98:12 101:22
a	55:8 56:17,18,19	answers 8:14	104:8
a.m. 2:4 6:2,6	57:9,17,18 79:10	anticipate 8:9	asking 8:4
11:19 30:24 31:2	79:10,14,17,23	anticipated 14:6	assaulted 45:21
ability 75:3 97:7	80:11,18 101:14	anymore 96:7	assistant 27:3
abuse 75:22,25	alex's 21:9	ao 40:9 41:6	associate 102:24
86:12 104:14	allegation 45:21	apartment 36:1	103:15
access 9:20 17:2,4	allegations 20:1	50:13,15 59:13	associates 21:2,6
accurate 72:15	44:22,23 45:5,10	101:18,21	assume 8:22 38:7
acted 66:4,16	45:14,17 75:20,22	appear 25:20	assuming 37:12
acting 66:3,15,16	75:22,25 86:12	32:11 34:6 35:7	39:14
76:7	89:11 99:3 104:14	40:16 65:23 66:2	attached 42:22
action 6:18 7:2	alleged 16:1,3 23:4	66:15,16 68:23	attempt 32:19
54:20 113:19	allegedly 102:10	appearance 7:5	attention 46:12
actual 96:13	allowed 103:17	59:20	attorney 27:2 79:3
adam 2:22 7:11	105:22	appearances 2:8	79:12 83:2 107:11
add 44:25	amber 13:14,24	3:1 4:1 7:7	107:16
added 10:18	15:23 21:20 28:17	appeared 53:7,23	attorney's 27:2
addition 25:16	29:20 33:21 36:7	58:21 74:22 77:8	attorneys 26:17
43:18	36:14 39:7 40:15	93:12 94:4 95:7	28:11,15 102:2
additional 18:1	41:1 46:6,7,15	appearing 100:7	103:17 104:19
57:21 84:19 86:25	48:3 49:15 50:22	appears 70:12	105:13,17,22
address 83:11	56:3 58:3,5 60:15	approximately	106:2
109:11,21	62:22 63:21 64:7	10:19 32:8 34:11	authorized 9:20
affiliations 7:7	65:19,22 68:22	35:12 44:16 47:2	available 110:7,10
	69:16 73:5,12,19	48:19 89:9	avenue 2:2 3:16,21
	73:24 74:16 75:6		4:5 6:22 109:14

[avoid - camera]

<p>avoid 71:1 awaldman 2:24 aware 13:13 15:18 15:22 16:24 49:25</p>	<p>belief 45:16 112:8 believe 15:25 24:1 24:3 26:8,18 30:3 32:20 33:6 43:14 43:22 51:3 57:22 61:7 86:20 100:21 102:14,16,23 109:1 benjamin 2:11 best 8:18,19 97:6 112:7 betao 7:10 better 38:13 39:21 bfreedman 4:7 big 63:11,12 90:5 90:12 biles 3:4 5:5 7:9,9 8:2,4 30:22 31:5 31:14,19 35:19,20 37:18,21 62:16,18 91:8,16 99:11,18 108:12 109:3,16 109:20 110:24 bissner 3:4 bit 16:6 21:17 23:3 26:3 32:19 35:16 38:4 57:8 66:23 88:5 99:5 black 40:3 blair 27:7,9 102:25 103:5,8,12 blame 104:8 bloom 1:6,7,9 6:16 7:14,14 26:25 107:13,16 body 18:8,19 19:2 19:16 91:5 bottle 71:24 bottom 63:1,19 74:4</p>	<p>boulevard 3:10 brandon 75:13,18 76:3 79:23 80:11 80:15 81:16 82:7 83:24 84:9 85:22 86:3 103:16 107:6 brandon's 81:17 81:22 82:7 84:1 84:17 107:7 break 9:3,5,9 30:17 91:8 99:16 brief 99:16 103:13 104:7,10 briefly 27:22 30:22 brit 7:9 8:3 brittany 3:4 broadway 10:11 bros 1:2,15 brown 2:10,16 109:25 110:6 brownrudnick.c... 2:13,19 bruises 18:10,23 19:4 24:7 47:7 48:10,17,20,25 58:17,22 60:25 87:12,23 89:7,14 90:6 91:3 bryan 4:4 buckley 3:9 buckleysandler.... 3:12 building 9:14,19 10:5,9,12,17,20 11:11,21 12:22,24 13:9,13,14,19,23 15:10 20:23 27:15 27:16 32:15,16 34:23 36:18 38:7 38:18 40:10,12</p>	<p>42:18 49:9 54:3,5 54:12,13,20 55:15 56:1,2,11 57:19 59:16 64:20 65:2 66:2,7 71:10 74:25 76:3 79:2,5 79:13 82:8,11 84:16 85:1,10 86:19,22,25 87:18 89:1,18 91:6 93:18 100:12,20 100:23 101:2 102:22 103:3 105:18 building's 86:4 burke 27:8,9 102:25 103:4 106:15,21 bus 79:7 button 51:5 95:18</p>
<p>b</p>			
<p>b 5:10 37:18 back 10:8 12:14 25:14 27:17 28:18 29:3 31:3 41:2 43:19 44:1,5,8,15 44:17,24 45:15,24 46:10 50:8 51:20 52:8 57:21 58:5 59:15 60:16 62:7 62:23 64:22 70:9 71:13,24 72:2 77:18 78:9 88:16 89:7 91:14,19 92:23 93:11 95:1 95:13,20 96:1,16 99:23 108:13,15 109:25 backing 18:3 96:22 bad 25:4 band 87:13 based 83:4 85:20 bathroom 62:21 bbiles 3:7 bc 6:20 bc680066 1:5 bchew 2:13 bear 9:1 35:16 65:11 beato 3:4 beginning 52:20 91:13 behalf 2:2 7:17 26:13 28:16 29:9 84:16 85:23 100:22 106:18</p>			
		<p>c</p>	
		<p>c 1:2,14 3:21 6:15 37:20 c.s.r. 113:3 calendars 96:16 california 1:1,2,3 1:4,15,17,19 2:3 2:18 3:11,17,22 4:6 6:1,19,23 109:15 110:1,6 112:1 113:1,4,25 call 15:15,17 81:19 called 16:17,18,18 16:20,25 56:3 60:17 65:15 69:12 81:15,19 92:2,17 100:12,19,21 101:9 camera 12:13 29:11 35:5 53:13 53:16,16,19 63:25</p>	

[camera - correct]

<p>68:9 70:18,20 72:12,24 105:4,5 cameras 9:18,24 9:25 10:2,16,20,22 11:9 12:6 15:2,5 26:4 34:22 37:14 37:16 70:15 71:2 71:9 74:25 94:11 94:12 98:19 camille 2:16 car 51:19,21 54:7 55:12 92:16,17 94:21 cara 93:21 cart 31:23 case 6:20 31:9 37:19 97:17,22 105:16 106:11 107:23 113:16 casual 59:24 caused 19:22 20:1 23:12 cease 13:22 cell 33:14 cellular 6:9 certain 51:10 82:4 102:19 104:2,21 105:1 certified 110:10 113:24 certify 113:4,18 change 45:16 75:7 changes 110:2 check 27:23 46:10 105:4,5 cheek 41:16,20 48:15 90:18,19 chew 2:11 clarify 82:22 96:1 clarifying 19:11</p>	<p>cleaning 9:23 13:5 clear 45:4 clearer 48:4 clearly 41:20 60:23 clip 31:21 32:4 72:3 clips 30:18 31:6,7 43:11,12 65:22 66:2 71:23 close 34:13 47:4 63:16,18 clothing 52:5 coat 40:3 collect 99:17 collected 30:4,9,16 31:8 collecting 98:16 columbia 9:14 10:9,12,20 11:11 11:21 12:21 13:12 15:10 32:14 34:23 49:16 50:22 54:3 54:12 57:19 59:16 66:1,7 86:18 91:6 come 9:19 12:3 13:24,25 14:7 15:7 23:22 25:3 29:8,13 40:24,25 51:19 52:6 56:15 57:9 64:2 84:9 88:20 92:3 96:23 101:1,23 103:15 103:25 104:1 comes 37:12 comfortable 85:11 85:15 coming 10:5 13:10 13:10 17:15 28:18 50:3 71:24 81:14 81:18 92:16,17</p>	<p>102:22 comings 38:6 commencing 2:3 common 10:23,25 communicate 107:10,13,15 companies 7:10,12 company 9:13,15 77:15 complainants 1:12 complaint 100:22 complete 113:13 completion 113:16 complex 10:13 computer 50:3,9 50:10,11,12 concerned 77:12 77:15 78:1,18 94:4 concerning 78:4 concierge 9:13,15 12:21 63:4 conclude 60:2 88:14 concluded 111:4 concludes 110:17 conclusion 25:2 condominium 10:13 confidential 82:12 107:20 confidentiality 77:14 107:23 confused 98:13 consent 9:20 consistent 37:2 59:6 consuming 29:12 contact 73:13 content 28:4</p>	<p>context 30:19 93:7 continue 6:10 86:18,21 103:14 continued 3:1 4:1 86:24 continues 33:10 conversation 21:25 22:4,11 24:10 55:8,24 56:8,22 80:22 82:6 83:4 84:4 105:19 conversations 6:8 8:8 17:14,17 20:22 21:1,16 81:2,10,13 84:19 86:7 92:1,7,20,22 93:5,8 copied 29:17,21,21 copy 29:5 109:10 110:10 cornelius 21:8,11 21:12,18 24:22 61:8 62:22 63:23 79:23 80:10,18 cornelius's 63:3 corner 70:21 corporation 1:3,4 1:4,16,18,19 correct 10:1 11:19 12:7 14:24 17:5,7 17:24 20:12,15,16 20:19 22:9,17 24:18,24 29:2 32:23 34:21 35:6 35:24 36:17 38:9 39:8 42:23 49:1 50:20 51:16 52:18 52:25 54:10,22 61:25 63:2 70:14 72:20 73:1 75:17</p>
--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

[correct - domestic]

76:22 78:14 80:21 88:25 96:2,21 102:12 103:8 104:22 105:12 110:3 112:7 113:12 corrected 110:10 corrections 109:18 109:23 correctly 92:10 98:20 corrine 1:21 2:1 5:4 6:13 7:20 110:18 112:5,14 counsel 2:8 6:14 7:6 108:24 count 15:6 country 76:20 87:20 89:22 91:1 100:15 101:5 county 1:1 6:19 112:2 113:2 couple 26:22 27:22 71:13 87:15 88:3 91:20 92:2 95:11 96:20 98:18 99:16 100:4 104:6 105:4 course 25:14 94:24 99:18 court 1:1 6:18,25 8:5 31:18 92:10 109:5,9,22 covered 11:5 cross 1:12,20 6:14 6:18 csr 1:24 2:5 cut 19:20 41:13 42:15 cuts 18:12 24:7 47:7 48:10,17,20	48:25 58:17 60:25 cvasquez 2:19 d d 5:1 47:13 72:10 d'anne 1:24 2:4 6:25 108:9 113:3 date 16:13 35:9 37:22 46:16 53:9 57:25 58:10 60:10 64:4 66:14 69:8 100:11 101:19 102:5,9 dated 112:10 dates 96:7 105:7 day 12:18 22:15 23:25 24:23 27:16 28:23 29:10 44:14 47:23 52:9,14 55:11 60:21 61:11 61:14,24 65:13,17 67:9 68:11 69:14 72:1 81:25 93:24 94:1,8,23 102:17 102:20 103:10,11 103:15,20,21,23 104:1 112:10 days 12:17 20:14 30:11 dc 2:12,23 3:6 dealt 27:10 decided 97:18 declare 112:5 decorator 67:20 deemed 110:3 defendants 1:8,20 3:14 4:3 6:14 definitely 104:3 delevingne 93:21 94:7 95:14 depicted 33:7 37:25	deposition 1:21 2:1 6:13,21 96:11 96:12,24 100:7 105:16,23,25 106:7,10,17,22 108:20 109:10 111:3 113:6,9,15 depositions 97:19 depp 1:2,14 6:15 7:10,12,18 13:13 15:7,9,19 17:9 26:13 28:16 35:4 35:25 38:23 45:22 75:23 76:1,14,19 86:13,15,21 87:18 89:1,11,18,21 90:25 98:15 100:14 101:4,8 103:7 107:11 108:24 109:1 depp's 26:5 97:22 102:2 105:13,17 105:22 106:18 describe 11:23 19:18 21:1,16 23:19 24:10 28:19 31:20 32:13 73:3 89:7 described 32:1 33:6,22 34:15 41:11,23 54:8 56:9,22 71:18 75:5 description 5:11 design 52:5 designated 107:19 designer 36:7,11 36:12,21 desk 9:16 11:2,22 11:24,25 12:3,5,8 12:22 17:1 31:22	32:1,11,16 37:3 42:4 46:1,22 63:5 77:11,20 78:2,12 81:9,20,23 82:21 83:6 85:18 97:1 detail 21:17 determine 66:24 device 33:12 diemer 1:6,9 6:16 different 42:3 44:19 66:3,18 differently 66:17 dinner 28:18 directed 10:22,23 86:3 direction 113:12 directly 36:13 65:9 discuss 17:18 100:9,23 discussed 79:5 discussing 103:14 discussion 108:7 displayed 12:9 distance 12:1 75:1 divenere 36:12 49:20 67:18,23 divorce 15:20 20:13 26:5 31:8,8 50:23 76:15 86:15 92:13 97:22 98:15 105:16 106:11 107:19 dog 11:2 doing 40:16 44:21 46:18 68:23 69:1 70:5 73:16 95:15 97:3 domestic 20:4,7 76:13
------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

[door - feel]

<p>door 11:4 62:21 63:1 doors 58:6 64:2 73:2 downloading 26:10 downstairs 88:21 drink 36:16 drinking 95:12 drive 2:17 5:12 88:23 dropped 46:19 50:11 80:25 87:11 dropping 33:11 88:16 92:5 dry 9:23 13:5 duly 7:21 113:6</p>	<p>el 109:14 elevator 31:23 35:3,7,22 36:3,15 38:3,15 40:14 43:3,9 47:16,17,18 49:3 53:19 57:24 58:2,6 59:12 60:9 62:7 64:24 65:5 68:10,13,21 69:2,7 70:15,17 71:11,23 72:18,23,25 81:14 87:12 94:15,20 95:13,15 98:5,6 105:5 elevators 11:1 34:23 35:1 51:5 65:7</p>	<p>erased 30:11 escorted 15:14 esparza 1:21 2:1 5:4 6:13 7:17,20 8:3 9:12 31:6 37:22 60:8 91:17 100:3 108:19 110:18 112:5,14 esq 2:1,11,16,22 3:4,9,16,21 4:4 et 6:15,17 evening 47:24 event 113:19 events 37:15 ex 33:11 exactly 45:4 53:12 92:15 93:7 102:20 103:3 examination 5:3 8:1 100:1 examined 7:22 113:5 examples 71:4 excited 21:19 excitedly 61:15 exhibit 5:12 31:15 31:16 exit 42:21 exited 15:15 exiting 11:3 13:9 43:2,3 69:2 expedited 110:22 experience 70:22 explain 31:11 98:4 99:5 explicitly 104:13 eye 19:21,21 41:16 48:16</p>	<p>f f 60:7 62:14 face 18:10,12 20:18 21:3 22:2 22:14 23:1,14 24:7 25:8,12,25 28:22 34:9 36:25 37:6 41:13,15,17 41:21,24 44:3,4,10 45:5,10,12 47:7 48:4,7,11,13,15,21 48:21 53:8,24 58:8,14,18,20,25 59:1 60:22,23 61:1 73:7,14 74:1 74:2,6,7,16,19,23 75:6 77:1,9,12,21 78:13 79:20 81:5 85:11,19 86:10 92:12 99:7 104:24</p>
<p>e</p>	<p>elon 50:3,21 55:6 56:6,15 57:9 90:2 93:21 94:21 105:13</p>	<p>examination 5:3 8:1 100:1 examined 7:22 113:5 examples 71:4 excited 21:19 excitedly 61:15 exhibit 5:12 31:15 31:16 exit 42:21 exited 15:15 exiting 11:3 13:9 43:2,3 69:2 expedited 110:22 experience 70:22 explain 31:11 98:4 99:5 explicitly 104:13 eye 19:21,21 41:16 48:16</p>	<p>facial 40:21 facing 11:1 fact 82:23 83:8 85:18 fagnano 64:19 fair 9:10 19:11 71:14 fake 71:19 72:21 74:8 76:2 98:7 false 45:14,17,23 104:14 far 34:11 47:2 62:25 fast 32:19 33:5 35:16,18 fault 98:23 fed 33:11 federal 113:15 feel 53:12 77:16 82:1 97:23</p>
<p>e 5:1,10 47:14 57:22 110:1 ear 48:15 earlier 32:21 41:11 43:13,15 55:1 61:7 71:17 77:4 80:16 91:17 98:14 107:2 early 72:13 east 10:20 13:12 49:16 50:22 eastern 9:14 10:9 10:12 11:10,20 12:21 15:10 32:14 34:23 54:3,12 57:19 59:16 66:1 66:7 86:18 91:6 eight 63:14 either 24:3 39:22 51:12,13 52:23 101:20 103:4,12 104:16</p>	<p>employee 16:18,20 16:22 17:4 54:18 54:19 61:8 employees 77:14 78:22 100:24,24 employment 15:10 encountered 23:15 59:15 encounters 23:17 23:20 endeavor 2:21 7:11 endurance 9:6 entered 71:11 72:23 entering 11:3 entertaining 95:23 entrances 11:2 entry 64:1</p>	<p>examination 5:3 8:1 100:1 examined 7:22 113:5 examples 71:4 excited 21:19 excitedly 61:15 exhibit 5:12 31:15 31:16 exit 42:21 exited 15:15 exiting 11:3 13:9 43:2,3 69:2 expedited 110:22 experience 70:22 explain 31:11 98:4 99:5 explicitly 104:13 eye 19:21,21 41:16 48:16</p>	<p>facial 40:21 facing 11:1 fact 82:23 83:8 85:18 fagnano 64:19 fair 9:10 19:11 71:14 fake 71:19 72:21 74:8 76:2 98:7 false 45:14,17,23 104:14 far 34:11 47:2 62:25 fast 32:19 33:5 35:16,18 fault 98:23 fed 33:11 federal 113:15 feel 53:12 77:16 82:1 97:23</p>

[feet - going]

<p>feet 12:1 47:5 63:14 feldman 1:6,10 6:16 female 49:23 fiance 38:24 fiancé 68:20 fight 16:5 figure 79:1 95:19 104:20 figured 95:21 file 12:20 20:4,7 filed 6:18 50:23 filing 20:11 76:13 76:14 filmed 46:16 financially 7:3 find 29:13 fine 25:21,22 30:14 65:24 110:1 finger 57:5,14 fingers 90:7 finish 8:10,12 finished 99:11 firm 2:21 6:24 7:1 7:12 27:1,5 107:16 first 7:21 16:8 27:16 31:14 52:13 54:4,6 71:17,17 77:19 98:15 103:10,20,23 108:22 five 38:22 flevin 3:12 floor 2:17 fob 51:4 88:22 fobbed 51:3,17,19 52:9 54:6 55:6,11 fobbing 51:6</p>	<p>follow 86:4 following 22:5 24:15 28:10 50:17 50:18 51:7,8,14 75:15 82:1,16 102:4,7,13 109:3 follows 7:22 footage 12:14 26:4 26:9 27:3,19 28:7 28:17,20 29:5,5,9 29:13,15,19 30:4,9 30:10,15 32:5 34:17 35:10 37:23 43:19 44:2,5,9,18 44:24 45:16,19 47:15 57:23 60:8 60:20 61:11 62:11 62:19 63:25 64:4 64:6,23 65:16 68:3 69:13 71:9 72:25 99:1 102:9 104:22 105:2 foregoing 112:6 113:6,14 forget 49:21 61:19 101:13 106:23 forth 88:17 forward 32:19 33:5 35:16,18 found 29:15 frazzled 66:20 fredrick 3:9 freedman 4:4,4 frequent 49:13,15 frequently 67:22 101:7 friday 1:22 2:4 6:2 11:14 15:25,25 17:13 18:2 19:13 20:12,17 23:6 41:12,24 43:22,23</p>	<p>44:2,9 77:2,9 81:6 82:2 85:19 92:11 93:9 99:8 104:25 friend 49:20 56:6 56:14 83:13,19 84:6 friends 14:2,4 39:10,11 41:8 66:22 67:6 82:9 101:18 front 9:16 11:2,4 11:22,23,25 12:3,5 12:8,9,22 17:1 32:1,15 36:13 40:8 42:4 46:1,22 63:5 74:6,7 77:10 77:20 78:2,12 81:9,20,23 82:20 83:5 85:18 97:1 frontal 36:25 58:24 ftllp.com 4:7 full 21:9 58:24 further 86:7 99:12 109:2 113:18</p>	<p>70:17 72:18 92:13 girl 42:10 give 8:11 17:21 28:15 33:1 37:3 37:13 71:4 91:23 98:11 99:16 given 29:22 82:20 110:17 glaser 27:7 glendon 2:2 6:22 go 6:11 8:23 9:4,8 12:14,16 15:16 20:4,6 29:6,8 30:12,16,22 38:21 43:5,8,9,9,19 44:1 44:5,17,24 45:24 46:10 47:14 50:15 57:21 64:2,22 65:4,6 71:13 72:2 91:19 96:16 101:21 108:2 109:20 goals 83:4 god 21:20 goes 65:8 going 8:9,21 13:3 14:21 15:13,19 20:4,6,23 30:23 31:3,14 32:16,19 33:5 35:3,9 36:3 37:18 43:6 52:8 57:12 58:4 59:15 61:6 64:8 65:20 65:21 66:23 67:1 68:4 69:17 76:6 88:23 89:7 91:10 91:14 92:10 93:11 94:15,19,21,22 95:1,13 96:1 97:16,18,19 99:3 99:19,23 100:4</p>
		g	
		<p>g 2:11 62:15,17 garage 11:4 42:22 43:9 56:4 64:9 69:20 92:18 gate 56:4 gaylynn 16:21 17:4 22:20 24:9 24:11 79:23,25 general 22:20 26:9 28:6 62:21 75:11 75:12 76:2 107:2 107:7 getting 15:15 20:13 36:15 58:2 59:10 62:7 70:10</p>	

[going - interacted]

<p>108:3,13,15,17 109:9 goings 38:6 good 6:5 8:3 9:1,2 81:16 100:3 101:10 goodman 1:7,11 6:17 grand 3:16 great 30:21 greet 12:4 13:10 group 6:22 73:11 guard 80:5 guess 63:24 93:24 guest 50:13,22 51:2,24 guests 49:13,15,18 49:24 50:2 51:4 93:16 guide 84:3 guy 33:11 50:3,6,9 50:10 52:2,3</p>	<p>25:12 29:16 30:10 102:10 happening 12:14 77:8 happy 8:24 25:23 harrell 21:12 22:1 22:11,12,19 24:22 61:12 63:9 80:10 hat 42:10 70:4 head 63:8 70:12 74:3,4,5 heads 70:6,23 hear 19:25 20:3 heard 13:14 14:7 14:10,23,25 15:5 15:19 17:9,12 18:1,4,17,25 20:10 20:10 21:13,20 22:1 24:6,16,19,23 25:7,17,18 30:20 32:22 33:21 34:3 34:15 35:4,13 38:23 39:6 40:11 40:15 41:12 42:2 43:15 48:20 49:3 49:9,11 50:22 53:2,7,23 54:12,24 57:18 59:6 61:9 63:9 66:6 67:7,11 67:16,22 70:3 71:15 74:15,16 75:6,6 76:1,2,17 76:17 81:3,10 82:7 84:20 85:9 85:20 86:8,18,24 87:22 88:2 89:5,8 91:4,18 92:1,21 93:6,13 94:17 95:7,14 96:9 98:9 98:19 99:1,2 104:5 105:11</p>	<p>108:25 heard's 36:1,25 37:6 39:7 44:10 45:21 51:17 58:14 59:13 60:22 71:19 77:9,21 79:20 106:2 hearing 110:7 held 6:21 31:1 91:11 99:21 108:5 108:7 help 64:14 82:19 103:18 helpful 27:19 28:1 28:8,9,14 74:12 hergott 1:6,9 6:16 7:14 26:25 107:16 hide 71:12 hired 29:13 hit 18:14,21 19:6 37:9 47:10 59:3 61:4 73:17,19,22 73:25 74:16 99:2 holding 33:14 37:11 home 109:11,21 hours 11:15 26:8 housekeeper 13:4 17:21 32:22 33:23 35:13 91:23 housekeepers 33:2 huh 18:6 21:21 67:21 68:1 76:16 90:24 107:4 huh's 8:16,19 hurt 57:5,14</p>	<p>identified 49:2,23 74:12 identify 36:9 49:18 64:14 105:7 identifying 29:6 ii 1:2,14 6:15 important 8:7,17 99:1 impression 97:2 incident 16:1,1,3 23:5 52:6 89:10 95:24 102:3,10 indepthly 26:19 indicate 23:25 24:5 indicated 56:10 indicating 12:11 12:12 73:7 indication 37:8 61:3 individual 10:24 infinitum 1:4,18 influence 88:4 93:13 94:5 information 28:15 82:12,21,23 97:9 97:21 98:1,11 injuries 18:7,18 19:1,16,18 20:15 20:18 25:24 91:5 injury 59:1 inquire 23:13 inside 23:23 instances 44:19 instructed 5:17 interact 12:23 13:1 14:8 15:9 88:20 interacted 14:10 14:23 21:3,13 22:2 24:6,16,19,22</p>
<p>h</p>			
<p>h 5:10 63:24 hair 42:15 50:6 60:3 haired 42:11 52:2 52:3 hallway 12:1 31:24 62:12,20 81:24 hand 36:16 37:12 70:21 71:25 89:15 90:5 113:20 handing 33:25 34:1,12 handling 41:10 hands 33:12 62:4 happen 25:13 happened 12:15 12:18 16:15 24:12</p>			
		<p>i</p>	
		<p>idea 78:10 79:2 identification 31:17</p>	

[interacted - look]

<p>26:12,16 35:13 61:12 66:6 93:14 interacting 14:25 25:17 43:18 66:22 89:24 90:1 interaction 32:21 32:25 33:6,22 34:14 61:8 88:9 91:21 104:10 interactions 17:9 17:11 18:1 25:1,6 25:9 30:20 31:13 34:5,16 43:15 59:8 85:20 87:1,4 87:7,10 88:1,3 89:4 91:18 96:22 interested 7:3 113:18 interference 6:9 interior 36:7,10,12 36:21 67:19 interrupt 30:13 76:23 investigation 103:19 involved 10:2 26:3 78:5,7 97:20 involving 32:22 io 40:9 41:4,6 42:9 42:10,12 49:20 67:24,25 irvine 2:18 109:25 110:6 isaac 39:1,9,10 issue 77:23 106:21 items 13:6</p>	<p>january 1:22 2:4 6:2,6 113:20 jay 64:19 job 1:23 63:3 95:23 john 1:2,14 6:15 johnny 13:13 57:5 57:11 johnny's 39:10 josh 14:5 68:18,19 july 96:17,18,23</p>	<p>100:19 101:4 103:1,9 106:22 knowledge 34:2 89:21 90:3 93:16 112:8 known 76:19 kpeterson 3:23 kurt 3:21</p>	<p>length 34:13 level 11:2 17:3 38:3,21 42:19,20 43:4,5,10 51:21 64:1 68:14 69:3 69:18,19 levin 3:9 lie 85:16,17 lines 33:17 liddle 9:21 16:6 21:17 23:3 26:3 57:8,10 66:18,20 66:23 88:4 90:13 95:4,7 99:5 104:6 live 39:19 79:5 86:18 lived 13:16 35:4 36:18 66:1,7 79:2 lives 79:12 living 9:12 14:2,2 36:23 38:25 39:1 39:2 86:21,24 89:1 91:5 llp 1:7,11 3:9,15 4:4 6:17 lobby 11:4 15:12 62:9 65:9 69:4,18 locate 34:19 located 6:22 10:10 11:1 41:15 48:21 81:22 loft 23:22 long 50:6 51:18,23 86:17 look 12:15,16 23:22 27:3 28:5 29:8 33:9 44:5,17 44:24 45:24 57:21 60:6 62:10 68:2 71:22 72:2,11 74:17 89:14 95:3</p>
	<p>k</p>	<p>l</p>	
	<p>keep 70:23 76:24 keeping 70:12 kevin 101:6,6,7,10 101:12,13 key 32:22 33:2,23 33:25 34:1,12 35:14 37:3,11 51:4 91:21,23 92:25 keys 17:21 87:11 kind 28:8 80:25 84:3 88:12,13,14 king 80:2,3 knew 29:25 30:7 44:14 77:16 97:5 97:10,13 101:1 105:5 know 8:24 9:4,6 11:5,8 13:4,16 16:13,17 27:13,14 28:9 29:23 31:11 33:10 36:22 39:25 40:6,9,22,23 42:8 46:20 50:7,10,25 51:10,18,25 53:5 57:11 61:19 63:14 67:5 78:9 82:22 88:7 92:9,24 93:8 93:20 95:21 96:7</p>	<p>l.r.d. 1:3,16 ladies 103:10,11 lady 39:19 103:11 103:12 landline 33:16 81:20 lapsing 8:18 laughing 73:8,9,18 74:8 laura 27:7,9 36:12 49:20 67:18,23 96:25 102:21,23 103:4,12 laviolette 1:6,10 6:16 law 2:21 6:22 7:11 27:1,5 107:16 lawyer 84:18 lawyers 26:5,15 26:16,21 27:10 29:4 31:8 86:4 97:22 98:15 layout 11:23 learn 16:15 20:6 leave 13:6 led 60:2 88:14 left 36:13 76:19 90:21 100:15 101:4,11 103:12 legal 6:24 7:1 98:11 110:20</p>	

[look - neck]

<p>96:14 98:16 101:23 104:21 105:1,6,8 looked 19:18 29:4 37:2,16 42:3 44:8 45:15,19 59:7,22 60:1 88:11 95:2 looking 29:19 30:7 30:18 32:4 40:18 48:24 64:13 66:24 67:2 70:4 71:7 72:24 75:2 95:1 looks 36:3 37:11 42:2,15 62:5 72:15 los 1:1 2:3 3:17,22 4:6 6:1,19,23 112:2 113:2 lost 62:16 72:8 lot 14:12,13 28:5 49:11 66:6,10,23 71:8 105:6 lovely 21:23</p>	<p>manage 32:16 management 54:20 manager 22:20 26:9 28:6 75:11 75:12 76:2 107:3 107:8 manager's 62:21 marathon 9:5 mark 22:13 23:1 31:15 41:13,23 44:3,4,10 45:5,9 90:17,22 99:7 marked 31:17 marking 69:5 72:9 marks 19:21,23 20:1 22:2 23:14 24:7 34:9 37:5 47:7 48:10,17,20 48:25 53:7,23 58:17,21 60:25 74:19,22 77:1,8,12 77:21 78:3,12 79:20 80:14,15,20 80:24 81:3,5,9 83:6,9 85:11,19 86:10 89:15 90:5 91:9,13 92:12 104:23 match 31:12 mathew 3:16 7:13 matter 6:15 76:6,8 96:4 110:8 mean 9:17,25 11:17 30:13 35:22 75:22 76:23 77:13 78:6 80:18 90:20 94:19 98:7 meaning 25:22 51:8,13 55:21 79:22 98:8</p>	<p>media 6:12 20:10 78:11,15 80:24 91:10,14 110:19 meet 100:6 102:2 105:24 106:2 mention 56:19,25 mentioned 15:7 24:9 27:22 30:1 50:9,21 52:1 54:2 54:25 55:2,4 56:14 92:9 mess 88:13,15 messed 57:10 messaging 99:9 messy 60:3 met 21:19,20 61:15 105:17,19 106:8 mezzanine 11:2 29:25 38:3 42:19 42:20 43:4,5 51:20 53:21 64:1 69:18,19 73:2 88:22 93:15 105:4 michelson 2:17 microphones 6:7 middle 31:23 40:2 milner 101:13 mind 87:6,9 minor 17:20 minutes 104:12 missed 70:10 missner 7:10 mittchell 3:4 7:9 molino 109:14 moment 41:3 103:13 monday 11:14 17:12,18 18:4 92:7 93:1,8 99:8 101:20 104:24</p>	<p>110:24 monica 3:11 monitor 9:18,24 monitoring 10:2 11:9 monitors 12:5,9 month 16:11 months 96:20 morning 6:5 8:3 52:11,12 55:6 56:1 59:17 94:2 moungy 1:24 2:5 7:1 113:3 mouth 40:19 moved 13:20 36:24 mumbled 98:18 musk 50:4,21,22 51:2,6,17 52:8 53:1,8 54:2,5,11 54:24 55:12,15,25 56:11 57:18 59:15 90:2 93:21 94:7 95:14 105:14 mutual 39:11 mwrenshall 3:18</p>
m			n
<p>m 2:16 3:16 magazine 82:9,10 83:14,19 84:7,12 84:24 85:2,5 mail 110:1 mailroom 11:3 42:21 43:8 64:2 69:20 maintained 110:6 makeup 34:3,6 46:25 52:4 making 10:4 84:23 85:1,11,15 male 49:24 50:2 70:2,4 man 38:11</p>			<p>n 5:1 name 6:23 8:3 21:9 40:22 41:4 50:7 101:15 107:1 107:5,5 108:22 named 113:6,10 names 26:20,23 49:21 101:12 nature 8:16 necessary 109:18 109:24 neck 87:12 89:17 90:8,10</p>

[need - people]

<p>need 9:3 13:3,4,7 39:12 103:18 108:11 110:21 needed 17:2,2,20 29:14,16 51:20 81:15 88:21 nervous 9:21 23:23 never 13:24 34:7 82:14,23 night 55:20,21,22 56:2 93:22 94:24 94:25 99:9 100:11 105:9 nihil 1:4,18 nods 8:15 noise 100:22 nonverbal 8:14 normal 25:23 32:9 74:18 92:22 normally 66:16 67:7 north 109:14 note 6:7 notes 104:6 notified 110:2 number 6:12,20 71:14 91:10,14 110:18 nw 2:11,22 3:5</p>	<p>observe 15:1 25:8 25:18 51:23 observed 15:4 66:10 obtain 98:2 obvious 14:1 obviously 10:3 77:13 occur 16:5 25:10 25:11 72:21 occurred 16:1,2 odd 20:20 offer 109:3 office 81:17,22 82:7 84:1 109:25 oh 14:12 21:19 23:10 30:1,6 36:22 41:4 43:1 46:8 okay 11:7 16:6,7 17:22 19:11 20:21 23:6 28:10,13 29:15 38:4 41:11 46:13 49:22 50:21 54:1 55:1 56:24 57:7 62:10 64:22 68:2 72:6 77:7 81:2,7 82:3,13,25 83:22 88:9 95:22 98:21 111:1</p>	<p>opposite 90:22 order 20:5,11 76:14 original 109:6,7 110:3,5,9,11 113:15 originally 83:23 outcome 7:3 outlets 78:15 outside 40:14 72:25 92:3 overnight 80:4</p>	<p>77:23 particular 29:5 43:6 74:2 98:25 particularly 100:25 parties 6:10 partner 96:25 party 7:2 pasadena 109:15 pass 63:8 passing 13:8 patient 41:9 patios 38:21 patterson 75:13 75:19 76:3 80:11 105:21 107:6 patty 27:7 pause 41:2,3 58:4 62:13 paying 46:12 peculiar 99:10 penalty 109:8 112:6 pending 9:7 pennington 14:5 36:8,10,13,18 38:24 49:7,8 67:8 penthouse 13:17 16:19 17:3,15 35:3,23 38:2,16,17 38:25 43:3 47:18 51:18,24 53:18 57:24 59:11 60:9 60:18 64:24 65:4 65:9,16 68:10,14 69:7,13 93:17 people 8:8 26:15 40:5,8 42:8 49:3 49:22 52:6 63:15 70:23 71:1 77:20 80:16 82:9,10</p>
o		p	
<p>o 42:13,13 o'clock 52:16 61:23,25 72:4 oath 7:16 object 37:9 47:10 59:4 objections 7:4 observations 65:25 96:9,13</p>	<p>once 29:15 81:6 109:16,21 ones 40:6 71:22 online 20:8,9 22:25 onward 51:14 open 56:3 opening 38:3 opinion 97:8 opportunity 12:23</p>	<p>p.c. 2:21 p.m. 11:19 31:2,4 32:8 35:11 58:13 60:13 64:11 69:22 69:23,24 91:10,12 91:12,15 99:20,22 99:22,24 105:10 108:4,6,6,14 110:17 111:4 package 15:13,15 31:23 33:11,12 47:6 62:12,20,24 63:11,15 93:3 packages 9:23 13:5 62:4 page 5:3,11 pages 1:25 panel 49:3 pants 59:25 paparazzi 92:3,19 pardon 26:14 parked 51:21 parking 11:3 35:2 42:21,22 43:9,10 64:3,9 69:20 part 41:17 44:11 47:22 48:13,21 58:14,20 74:2</p>	

[people - recall]

<p>83:13,19 84:6,11 84:23 85:2,4 92:5 97:1 people's 49:21 percent 42:14 51:10 period 13:18 25:15,16 89:24 perjury 109:9 112:6 person 14:10,23 15:1,11 25:17 33:18 36:4 37:9 47:10,25 52:1 59:4 64:14,16 67:25 68:15,21 83:16 92:24 93:5 94:9,10 103:2 108:19 personal 13:6 personally 54:11 perspective 75:8 pertains 113:14 peterson 3:21 ph 35:21 38:19,19 39:1 105:5 phone 15:15,17 33:13,14,15,16 68:25 83:21 93:10 96:14 phrase 45:7 physical 59:20 physically 11:10 11:20 pick 6:8 13:5,7 46:20,22 47:6 picked 50:12 picking 92:4 93:2 picture 22:25 23:2 23:4,8,11</p>	<p>place 6:10 12:2 43:6 55:9 78:20 113:10 plaintiffs 1:5 2:2,9 3:3 6:14 31:16 play 33:10 84:4 please 6:7 7:5,7,16 75:10 109:12 point 9:3 13:22 15:18 19:15,25 23:7 26:2 27:4 34:2 36:23 41:11 42:7 49:8,24 74:17 80:12 87:18 87:20 89:2,18 106:3 pointed 27:18 police 16:17,18,24 17:1,15,16 22:16 24:12,23 60:17 65:15 69:12 100:12,19,21 101:1,9 pool 68:4 portions 104:2 position 107:7 positive 42:14 possibly 102:19 posted 23:4,8,11 practically 46:14 present 2:14,19 3:12,24 4:7,9 7:6 press 51:5 76:10 76:12 77:10 82:12 82:17,18,20 pressing 95:18 pretend 73:19,22 73:25 pretended 28:21 pretending 73:17 74:16 75:6 76:17</p>	<p>99:1 pretty 29:12 previous 22:7 96:11 previously 39:2 57:1,3 96:2 100:14 print 13:8 prior 12:15 32:2 52:6 85:18 100:6 113:5 private 6:8 probably 44:19 52:15 79:6 proceeding 7:4 107:19 proceedings 111:3 113:13,16 process 26:11 productions 1:3 1:17 prompt 44:4 prompted 44:1 95:3 property 54:20 102:8 proposed 84:20 proposing 85:9 protect 10:3 provide 9:16,22 providing 26:5 public 23:12 publically 78:2,11 publicity 79:7 publicly 81:8 punch 28:21 72:21 74:8 75:6 76:17 98:7 punching 71:20 76:2</p>	<p>purposes 110:11 purse 40:18 putting 85:14</p> <p style="text-align: center;">q</p> <p>quarter 90:13 quarters 90:14 question 8:10,13 8:21,22,23 9:2,7,8 25:4 44:6 66:5 108:17 questioning 45:1,2 45:4,9 77:1 questions 5:17 8:4 8:25 14:7 97:4,6,9 99:12,16 100:5 108:1 109:2 quick 30:5,6,17 91:8 quiet 104:3 quietly 105:3 quote 101:19</p> <p style="text-align: center;">r</p> <p>r 2:22 raquel 14:5 23:21 28:18 36:7,10,13 38:24 40:17 42:9 48:3 49:7,8,10 58:3 67:7,9 71:24 73:12,22 raquel's 68:20 read 109:17 realize 74:13 really 13:25 15:6 21:19 29:12 97:19 reason 8:14 recall 22:6 26:12 26:15,20,25 27:5 27:14,18,24,25 28:3,23 49:18 51:1,6 52:19 53:1</p>
--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

<p>53:11,12,16 54:4 54:23 56:20,21 57:15 61:14,17,18 72:1 74:9 89:6 90:11 92:6,10,15 96:6,12 102:17,21 106:10,12,14,15 106:16,20 107:18 108:20 receive 109:16,21 recess 31:1 91:11 99:21 108:5 recognize 33:18 36:4 38:10 39:13 39:15,22 40:20 42:7 46:3 47:25 64:14,16 68:15 70:7,11 record 6:6,11 7:8 8:15 9:4,8 30:22 30:23 31:3 45:3 91:10,14 99:19,23 108:2,3,8,13,16 109:4 110:16 recorded 6:13 8:15 37:23 recording 6:9 red 19:20,21 reduced 113:11 reed 3:15,20 7:13 reedsmith.com 3:18,23 referring 39:5 regarding 107:22 related 6:17 7:2 relation 53:6,22 60:17 65:15 69:12 72:22 81:23 96:8 96:13 relative 52:15</p>	<p>release 82:11,23 released 82:21 relieved 109:5 remarks 81:4 remember 26:18 28:19 53:14 55:18 76:12 77:7 78:15 88:22 92:21 93:6 93:7 102:5,6 107:22 108:22 remind 8:18 removed 12:20 rephrase 8:24 44:6 66:5 reported 1:24 16:5 77:11 78:2,11,15 81:8 reporter 6:25 7:21 8:5 31:18 108:11 109:5,9,22 110:15 110:21 111:1 113:24 reporting 78:19 representing 103:6,10 request 85:21 required 113:17 resident 14:11 39:13,14 46:3,5 47:21 49:16 64:20 65:2 82:24 residents 9:22 10:4 12:3,23 13:2 13:14,19,23 31:24 32:17 38:7 49:9 68:4 77:16 93:17 respect 109:6 respond 8:17 response 84:17 responsibility 98:11 109:6</p>	<p>restraining 20:5 20:11 76:14 retained 110:19 retract 82:19 83:5 retracting 84:5 return 76:20,25 review 44:1 109:23 113:16 riding 95:16 right 12:2 13:20 19:21 20:18 22:16 23:14 34:17,24 36:19 37:12 38:8 41:2,13,14,16,20 42:18 43:1,5,16 44:11 47:22 48:9 48:15 49:4 50:14 50:19 58:16,18 59:18 61:9 62:25 62:25 65:12 66:8 66:11 70:21 72:11 72:12,12,19,23,25 77:25 80:12,18 82:18 89:12 91:23 93:3 96:4 99:12 102:11 romero 21:10 54:21,23 55:14,24 56:1,9,10 80:11 101:14,24 room 15:13,15 62:12,20,24 63:11 63:15 rosenthal 1:6,9 6:16 rough 108:9,11 row 20:14 rudnick 2:10,16 110:6 rudnick's 109:25</p>	<p>run 11:2 running 10:7 84:12 runs 9:14</p> <hr/> <p style="text-align: center;">s</p> <hr/> <p>s 3:9 5:10 safety 10:4 samantha 49:20 sandler 3:9 santa 3:11 saturday 25:10,11 25:13 76:20,21 save 12:19 saw 15:11 17:12 18:2,4,17,25 19:8 20:14 22:13 29:20 29:24 30:1,1 31:12 44:10 45:11 53:15,16 54:4,11 55:20 63:8 67:17 67:24 71:8,19 73:3 77:12 80:15 80:16,20 81:14 85:10 91:22 92:24 92:25 93:2,8,11,14 94:1,2,14,15 95:4 95:6,11 saying 24:15 78:1 82:11 scaramanga 1:2 1:14 scared 23:24 101:18,21,22,25 schenkman 1:6,10 6:17 screen 63:20 second 29:3 60:16 62:13 103:11,21 103:22 secure 12:2</p>
----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

[security - subject]

<p>security 9:13,15 9:25 10:16 12:6 12:13 15:1,5 25:18,20 26:4 34:17,22 35:4 43:19 44:2,5,9,17 44:24 45:15,19 66:11 68:9 70:22 71:2,9,9 72:24 74:25 80:4 94:11 94:12</p> <p>see 8:5,18 13:9 19:10,13 23:22 24:8 28:13 33:7 33:10 34:19 35:21 37:15 38:4,13 40:10,11 41:20 45:12 47:7,9,21 48:7,8,10,17 51:22 55:23 56:7 58:17 59:1,3 60:23,25 61:3,6 63:19 64:13 65:8 67:7,9 67:10,10,13,16,22 70:9,18,20 71:10 72:18 74:7 77:3 78:8,12 79:25 81:9 83:25 85:18 91:4 94:7,12 98:21 104:23 106:16</p> <p>seeing 31:20 34:16 41:23 49:19 51:1 53:1 78:3 89:8 104:8</p> <p>seen 21:2 23:13 24:11,12 39:24 40:5,12,24 53:13 54:2,13,24 55:7,14 56:11,25 57:2,18 71:1,5,8 77:4,21</p>	<p>79:20 80:6,12,14 80:24 83:6,9</p> <p>selected 66:25</p> <p>send 109:9,11,20 109:24</p> <p>sensitive 6:7</p> <p>sent 51:4</p> <p>separate 21:25</p> <p>sequence 37:15</p> <p>serious 76:6,8</p> <p>set 10:24 30:17 37:14</p> <p>seven 12:1</p> <p>seventh 2:17</p> <p>shaggy 50:6 52:1,3</p> <p>shirt 59:24</p> <p>shoot 87:12</p> <p>short 42:11</p> <p>shorthand 113:10 113:24</p> <p>shot 32:5 36:25 38:13 39:21 40:21 47:19 48:4 58:24 60:20,22 61:11 62:24 64:4,25 65:16 69:6,13</p> <p>show 31:10 75:14 75:18 76:1</p> <p>showed 75:11</p> <p>showing 38:6 42:24 57:23</p> <p>side 12:10 48:7,15 58:16,18 90:10,18 90:19,19,22</p> <p>sign 33:12 77:14 109:24</p> <p>signature 113:24</p> <p>signed 109:8 110:4</p> <p>signing 107:22</p> <p>signs 18:14,21 19:4 59:1,3</p>	<p>similar 23:13</p> <p>sir 107:9</p> <p>sister 28:18,21 39:2,4,7,24 40:1 42:9 46:8 58:3 67:11 71:16,19 73:5,5,13,23,24</p> <p>sit 11:20 12:2 32:15 63:5,5</p> <p>sitting 12:8,22 32:11</p> <p>situation 8:10</p> <p>situations 13:1</p> <p>skip 26:2 38:4</p> <p>slow 29:12</p> <p>smith 3:15,20 7:14</p> <p>smoothly 10:7</p> <p>solutions 6:24 7:1 110:20</p> <p>sorry 9:20 41:5 42:17 46:12 67:5 96:22 107:1</p> <p>sort 9:5 20:1 32:12 41:13 85:22</p> <p>sound 9:10</p> <p>sounds 95:22</p> <p>south 3:16 10:11</p> <p>spaces 43:10</p> <p>speaking 79:10</p> <p>specific 16:13 23:3 27:19 30:18 74:5 92:6 105:7</p> <p>specifically 51:1</p> <p>spell 42:12</p> <p>spoke 79:4</p> <p>spot 65:12</p> <p>ss 112:1 113:2</p> <p>staffing 9:16</p> <p>stairs 65:7 95:20</p> <p>stalwart 6:22</p>	<p>stand 12:4 87:6</p> <p>standing 15:16 58:5</p> <p>stars 3:21 4:5</p> <p>start 22:21 26:10 30:18</p> <p>started 57:9 71:18 73:7,9 98:16</p> <p>starts 12:19</p> <p>state 1:1 6:19 7:5 7:7 88:23 104:13 112:1 113:1,4,25</p> <p>statement 82:10 82:19 83:5,8,20 84:2,5,15,20,23 85:1,4,8,12,15,22 86:5,8</p> <p>stating 82:20</p> <p>stay 51:18</p> <p>stayed 84:3 103:13</p> <p>steady 29:10</p> <p>stein 3:4 7:9</p> <p>steinmitchell.com 3:7</p> <p>steven 4:10 6:23</p> <p>stipulated 110:13 110:14</p> <p>stipulation 109:4</p> <p>stood 87:9</p> <p>stop 35:22,25 59:12</p> <p>stopped 68:13</p> <p>stopping 38:15</p> <p>story 84:12</p> <p>street 2:11,22 3:5</p> <p>strike 20:20 87:25</p> <p>struck 18:14,21 19:6 37:9 59:4 61:4</p> <p>subject 96:4</p>
-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

[subpoena - times]

<p>subpoena 102:8 subpoenaed 26:18 31:7 96:25 substance 83:8 suddenly 20:17 suggested 47:9 suite 2:3,12 3:5,10 3:17,22 4:5 sumerland 16:21 sunday 21:18 22:7 22:7,13,15 108:10 superior 1:1 6:18 supposed 10:6 28:9 74:13 104:20 supposedly 16:15 sure 9:18 10:4,6 11:25 23:10 24:15 26:24 28:10 44:7 44:14 45:3 46:11 79:15,16 82:16 96:15 99:6 102:9 102:20 103:1,3 105:11 108:12 surfaced 22:25 surfacing 22:24 surveillance 32:5 37:25 41:18 sutton 108:21 swaying 88:16 sworn 7:21 113:7 system 12:20 systems 29:11</p>	<p>takeaway 71:10 taken 2:2 6:13 35:10 113:9 talk 8:7 14:1 22:18 22:23 28:3 30:19 78:22,25 80:1,8 81:15 82:9,17,18 83:2,7,19,24 84:7 84:9,18 105:22,23 talked 11:9 22:24 24:5,9 25:2 28:11 42:4 77:11 79:17 79:19 92:11 93:9 101:7 103:16 105:18 talking 16:4,8,9 17:23 23:6 29:25 54:17 56:16 57:3 57:8 68:25 76:9 79:8 91:17 tape 104:2,8 tapes 25:18,20 tell 17:11 27:21 32:4,24 53:11 54:15 55:15,18 56:13 57:7 69:17 71:21 75:10 76:11 77:7 80:22 81:13 82:6 83:13,18 87:9 88:9 94:14 95:10 97:5 101:24 105:13 telling 54:23 ten 14:13 tend 70:23 test 9:6 testified 7:22 32:20 34:21 43:14 44:8 61:7 91:21 96:2,6 98:8,14 100:14 101:14</p>	<p>102:21 107:2 testify 96:9,24 113:7 testifying 71:18 testimony 32:2 107:18 110:17 112:7 text 21:18 62:1 101:6,8 texted 61:15 thank 7:15 41:9 99:13,14 110:15 110:20 111:1 thanks 19:11 thanksgiving 88:8 88:24 93:12,22,25 theendeavorgro... 2:24 thing 67:6 96:1 98:5,6,7 things 8:16 10:6 71:13 88:16 92:4 92:5 think 9:1 11:5,7 13:20 14:6 22:5 28:1 29:11,19,24 29:24 30:5,7 34:15,21 35:17 39:12,18,20 40:9 45:7,20 46:9 49:2 49:22 51:16 52:4 53:16,20,22 59:17 61:20 67:19,25 72:5,6 76:5,18 78:17 83:3,4 89:9 90:17 92:16 97:13 97:15 98:1,13,19 98:23,25 99:11,12 100:14 104:6,7 107:25 109:23</p>	<p>thinking 45:13 third 52:1 thirteenth 2:11 thought 27:19 28:8 39:18 57:10 76:4 97:4 98:13 thoughts 99:17 three 10:25 25:2,6 104:12 106:23 threw 79:6 thumb 5:12 thursday 19:8,10 53:14 93:10 tie 24:14 tilden 2:22 time 7:5,6 11:16 11:17 12:11,15,16 13:18 15:11,18 19:15,25 20:24 24:20 25:15,16 26:2,13 29:12,20 34:2 35:12 41:12 42:24 44:25 46:25 47:23 52:9 53:6,8 54:4,6,8 55:1 58:12 59:21 60:12 61:14,17,18,19,22 64:10 65:13 66:1 68:11 69:10,21 72:12,16 73:16 74:20 76:12 80:4 81:16 84:21 86:24 87:11 88:7 89:19 89:24 92:14 93:11 93:17,18 94:1,23 109:17 110:7 113:10 timeframe 10:19 times 14:9,14,16 14:18,20,22 15:4 24:17 27:22,24</p>
<p>t</p>			
<p>t 5:10 59:24 table 63:13 taitelman 4:4 take 6:10 9:3,5,8 22:21 29:7 30:17 33:9 50:8 60:6 65:7 72:2 82:25 91:8</p>			

[times - want]

28:2,3 34:16 44:15,16,17,20 45:11,16,20 46:13 51:16 53:2,4,5 54:3 56:10,13 91:25 92:2 94:24 95:6,10,11 98:18 105:4,8 tired 59:22 60:1 tmz 78:17 today 8:4 31:9 66:14 71:18 75:2 91:17 98:14 100:7 today's 110:17 togami 4:10 6:24 told 15:23 20:12 23:19,21 28:6 30:6 54:16 55:5,5 56:3 61:15 77:10 78:9 80:23 81:17 83:1,1,23 84:2 92:13 98:16,18 100:18 104:2,21 104:23 105:1,21 top 43:10 74:4 total 110:18 touching 70:6 track 62:16 72:8 transcribed 109:8 transcript 109:7,7 109:10,17,21 110:5,9,21 113:13 113:15,17 tried 104:3 trinity 1:21 2:1 5:4 6:13 7:17,20 110:18 112:5,14 true 77:19,22,24 112:7 113:12 truth 77:17 113:7 113:7,8	try 8:11,19 9:2 72:8,14 85:8 trying 28:14 45:7 65:11 71:1,12 74:12 79:1 95:17 97:24 tuesday 17:12,19 18:18 28:25 29:1 52:22 72:4 93:1,2 93:8 99:8,9 101:20 104:24 105:9 turned 73:6,6 tv 79:4 twins 46:14 two 29:10 33:17 38:21,21 40:8 47:5 51:12,13 63:15 68:4 89:9 90:16 103:10,11 103:24 104:12 109:17,22 110:3 110:19 typewriting 113:11 typically 13:2 63:17 66:3	understood 8:22 103:6 unit 6:12 13:16 33:2 109:15 units 10:14,24 31:25 38:17 unpack 16:6 57:7 untrue 77:19 unusual 85:21 87:3 88:1 89:4 upset 88:12 upstairs 23:22 use 65:6 usual 66:23 67:1	31:3 35:17 91:9 91:13 99:19,23 108:3,13 110:16 videos 31:12 34:20 49:12 66:11,13,25 67:2 71:8,14 98:16 videotaped 1:21 2:1 view 12:6 43:19 violence 20:5,7 76:13 visible 18:7,18 20:15 25:24 34:9 37:6 41:17,24 48:13,22 53:7 58:8,14,20 70:15 91:4 visit 40:24,25 53:1 53:8 103:20,21,22 103:23 visiting 54:16,24 57:18 93:18 visualize 95:17 vs 1:5,13
	u	v	w
	uh 8:16,19 18:6 21:21 67:21 68:1 76:16 90:24 107:4 underneath 19:20 understand 8:23 13:19 44:11 97:16 97:24 98:24 99:6 104:5 understandable 8:25 understanding 29:14 55:25 57:4 57:17 84:11,14	vague 97:4 various 38:7 vasquez 2:16 verbal 8:17 verbally 8:20 verify 101:23 veritext 6:24 7:1 110:19 versus 6:15 video 6:9,12 31:6 31:7,21 32:4 33:7 33:9 34:12 37:1,5 38:1 41:9,18 42:1 42:2,24 45:25 46:18 48:5,14,22 48:24 57:22 58:8 58:10,15 60:6 62:10 65:22 66:2 68:2,24 69:21 70:23 71:7,18,19 72:7 74:9,11,15 75:5,11,14,18 76:1 76:16 91:22 92:25 93:2 videographer 4:10 6:5,25 7:15 30:23	w w 3:4 wait 69:22 waldman 2:22 7:11,11 110:23,25 walk 13:25 22:10 31:24 64:12 walked 84:1 walking 73:1 wall 12:2 63:13 want 10:3 11:5 13:6 24:14 26:2 30:17 33:9 44:23 45:3,24 64:13 77:18 78:5,7 82:15 85:4 102:20

[wanted - zoom]

<p>wanted 29:7 79:3 82:15,17,19 83:18 84:15 91:19</p> <p>washington 2:12 2:23 3:6</p> <p>wasser 27:7,9 96:25 102:22,23 103:4 106:13,21</p> <p>watch 12:13</p> <p>watched 71:14</p> <p>watching 66:13 70:22</p> <p>way 8:24 18:15 42:2 45:7 66:15 66:19 77:16 85:8 92:23</p> <p>we've 66:13 75:2</p> <p>wear 34:6</p> <p>wearing 34:3 46:25 59:23</p> <p>wednesday 17:13 17:20,22,23,25 19:1 24:1,2,4 33:3 34:8 43:12 52:22 92:24 93:9 99:8 101:20 104:24</p> <p>week 17:13 21:14 22:5 23:17 24:20 25:7 28:23 43:13 43:15 48:19 50:17 50:18,18 51:7,8,8 51:14,14 52:20,21 52:23,23 58:21 59:7 63:6 75:15 75:16 77:5 80:17 82:1,5 91:19 92:1 92:21 93:6 96:10 102:4,7,13,14,15 102:17</p> <p>weekday 52:17</p>	<p>weeks 51:12,13 87:15 89:10 109:17,22 110:3</p> <p>went 15:16 44:8 44:15 45:15 52:13 73:6 81:16 88:10</p> <p>whatnot 29:20</p> <p>whispers 6:8</p> <p>whitney 39:6,7,24 40:1 46:8 48:3 49:3,9,11 67:13 73:12,20,21,22 74:15 75:5 76:1 76:17 98:8 99:1</p> <p>wilshire 3:10</p> <p>wine 71:25</p> <p>withdraw 25:4</p> <p>witness 5:3 7:17 99:14 109:12,14 109:19 113:5,20</p> <p>woke 59:22</p> <p>woken 60:2</p> <p>woman 38:10,14 39:22 40:20 49:6 79:2,11,17 106:17 106:24</p> <p>women 103:24 104:16</p> <p>work 11:10,13 13:12 29:18 32:12 32:13 33:15 52:13 59:18 94:25 97:2 101:8</p> <p>workday 32:9</p> <p>worked 22:5 26:21 77:20</p> <p>working 11:21 26:16 61:23 103:2</p> <p>works 54:19 82:10</p> <p>worried 88:23 92:18</p>	<p>wrenshall 3:16 5:6 7:13,13 62:15 99:15 100:2 107:25 108:9,15 109:2,13 110:14</p> <p>wrenshell 108:18</p> <p>writer 41:8 67:25</p> <p>wrong 34:22 76:4 76:5,18</p> <p style="text-align: center;">x</p> <p>x 5:1,10</p> <p style="text-align: center;">y</p> <p>yeah 29:21 38:20 40:12 42:16 46:15 52:7 61:22,25 67:5 69:25 105:3</p> <p>year 16:9 39:2 68:7 86:20 96:18</p> <p>years 106:23</p> <p>yesterday 54:25</p> <p style="text-align: center;">z</p> <p>zoom 75:3,3,4,4,7 75:7</p>
---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------