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Transcript of Brandon Patterson, Corporate Designee

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

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1 that I've showed you, is your understanding that 16:13:04
2 those are all accurate copies of ECB footage that 16:13:07
3 were taken and preserved by ECB since 2016? 16:13:10
4 A Yes. 16:13:15
5 Q And, again, by taken by ECB, I mean by you 16:13:17
6 or someone under your direction in the regular 16:13:21
7 course of business; is that your understanding? 16:13:25
8 A Yes. 16:13:27
9 Q And is it correct that ECB has produced 16:13:29
10 all the video footage that had been subpoenaed by 16:13:33
11 attorneys? 16:13:39
12 A Yes, that's correct. 16:13:41
13 Q So to the extent that footage has not been 16:13:43
14 produced, is it fair to say that that footage no 16:13:47
15 longer exists, or do you have another explanation? 16:13:53
16 MS. VASQUEZ: Objection; vague and 16:13:57
17 ambiguous, calls for speculation, assumes facts, 16:13:59
18 lack of foundation. 16:14:02
19 THE WITNESS: Can you expand on that, 16:14:03
20 please? 16:14:04
21 BY MS. STEMLAND: 16:14:04
22 Q Sure. So there's -- my understanding is 16:14:05

1 you testified there was 87 clips that have been 16:14:08
2 preserved; is that right? 16:14:10
3 A Yes. 16:14:13
4 Q And that the date and timestamps are 16:14:15
5 reasonably accurate, to your knowledge, on those? 16:14:18
6 MS. VASQUEZ: Objection -- 16:14:21
7 THE WITNESS: Yes, to my knowledge. 16:14:21
8 MS. VASQUEZ: Sorry, Mr. Patterson. Calls 16:14:23
9 for speculation and expert opinion. 16:14:25
10 BY MS. STEMLAND: 16:14:28
11 Q And to the extent there are any missing 16:14:28
12 days or times, is it fair to say that that footage 16:14:30
13 no longer exists, or is there any other footage 16:14:33
14 that could be produced? 16:14:35
15 MS. VASQUEZ: Objection; vague and 16:14:38
16 ambiguous, speculation. 16:14:39
17 THE WITNESS: Outside of the videos that 16:14:44
18 were requested, that's correct, no -- everything 16:14:45
19 else would have been written over at this point. 16:14:49
20 BY MS. STEMLAND: 16:14:52
21 Q Okay. So there's no other videos other 16:14:52
22 than those that have been produced, to your 16:14:54

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| 1 | knowledge? | 16:14:57 |
| 2 | MS. VASQUEZ: Asked and answered, calls | 16:14:59 |
| 3 | for speculation. | 16:15:02 |
| 4 | THE WITNESS: Yes, correct. | 16:15:02 |
| 5 | BY MS. STEMLAND: | 16:15:04 |
| 6 | Q Okay. And I believe you testified that | 16:15:05 |
| 7 | ECB currently has a new and improved video system; | 16:15:11 |
| 8 | is that right? Am I remembering that correctly? | 16:15:17 |
| 9 | A Yes. | 16:15:20 |
| 10 | Q And back in 2016, would you agree with me | 16:15:23 |
| 11 | that the video quality was somewhat grainy, as I | 16:15:26 |
| 12 | believe that we have talked about in some of the | 16:15:32 |
| 13 | clips? | 16:15:34 |
| 14 | MS. VASQUEZ: Objection; compound, | 16:15:35 |
| 15 | leading, vague and ambiguous, and calls for an | 16:15:40 |
| 16 | expert opinion. | 16:15:45 |
| 17 | THE WITNESS: Yes, compared to today's, | 16:15:48 |
| 18 | yes. | 16:15:52 |
| 19 | BY MS. STEMLAND: | 16:15:53 |
| 20 | Q And was it also a little bit fuzzy in the | 16:15:54 |
| 21 | clips that we reviewed today? | 16:16:06 |
| 22 | MS. VASQUEZ: Same objections. | 16:16:09 |

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| 1 | MS. STEMLAND: Okay. Can we, please, | 18:29:09 |
| 2 | scroll down to comment seven and could -- right | 18:29:10 |
| 3 | there is good. Can we, please, blow that up a | 18:29:17 |
| 4 | little. | 18:29:20 |
| 5 | BY MS. STEMLAND: | 18:29:23 |
| 6 | Q And I would like you to read, please, the | 18:29:23 |
| 7 | comment -- the third comment down where it says, | 18:29:25 |
| 8 | was this footage found? I'm not certain of the | 18:29:28 |
| 9 | date or time. I also do not recall who she was | 18:29:33 |
| 10 | with, but it was two females. I do not recall who | 18:29:35 |
| 11 | threw the pretend punch. I also do not recall if | 18:29:38 |
| 12 | she had any signs of injury during this time. | 18:29:41 |
| 13 | However, do I recall one of the females pretending | 18:29:44 |
| 14 | to punch Amber in the face. | 18:29:46 |
| 15 | Now, did you write this comment? Do you | 18:29:49 |
| 16 | remember it? | 18:29:55 |
| 17 | A I... | 18:29:55 |
| 18 | MS. VASQUEZ: Objection; compound, vague. | 18:29:58 |
| 19 | THE WITNESS: I do recall vaguely. | 18:30:02 |
| 20 | BY MS. STEMLAND: | 18:30:06 |
| 21 | Q And this footage never was found; is that | 18:30:07 |
| 22 | correct -- | 18:30:11 |

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| 1 | MS. VASQUEZ: Objection; calls for | 18:30:11 |
| 2 | speculation. | 18:30:12 |
| 3 | BY MS. STEMLAND: | 18:30:13 |
| 4 | Q -- to your knowledge? | 18:30:14 |
| 5 | MS. VASQUEZ: Objection to speculation, | 18:30:15 |
| 6 | assumes facts. | 18:30:17 |
| 7 | THE WITNESS: The footage was never | 18:30:18 |
| 8 | requested. | 18:30:20 |
| 9 | BY MS. STEMLAND: | 18:30:23 |
| 10 | Q By whom? | 18:30:24 |
| 11 | A Any of the attorneys. | 18:30:25 |
| 12 | Q So the footage -- is it your testimony | 18:30:31 |
| 13 | that this exists, this footage exists or not? | 18:30:36 |
| 14 | MS. VASQUEZ: Objection; vague and | 18:30:40 |
| 15 | ambiguous, unintelligible, misstates prior | 18:30:43 |
| 16 | testimony. | 18:30:47 |
| 17 | BY MS. STEMLAND: | 18:30:47 |
| 18 | Q Are you aware that Mr. Depp's attorney in | 18:30:47 |
| 19 | the UK trial has already admitted this footage | 18:30:50 |
| 20 | does not exist? | 18:30:52 |
| 21 | MS. VASQUEZ: Oh, my God. Objection; | 18:30:54 |
| 22 | hearsay, calls for speculation, unintelligible. | 18:30:55 |

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| 1 | THE WITNESS: It was no longer exists. | 18:31:01 |
| 2 | BY MS. STEMLAND: | 18:31:04 |
| 3 | Q And it would no longer exist, and it was | 18:31:04 |
| 4 | never produced as one of the 87 clips -- | 18:31:07 |
| 5 | MS. VASQUEZ: Objection -- | 18:31:11 |
| 6 | BY MS. STEMLAND: | 18:31:13 |
| 7 | Q -- is that right? | 18:31:13 |
| 8 | MS. VASQUEZ: -- misstates prior | 18:31:14 |
| 9 | testimony, argumentative. | 18:31:16 |
| 10 | THE WITNESS: That is correct. | 18:31:19 |
| 11 | BY MS. STEMLAND: | 18:31:23 |
| 12 | Q And I believe you testified earlier that | 18:31:24 |
| 13 | attorneys for both sides selected times and looked | 18:31:26 |
| 14 | through video and made selections of what to | 18:31:30 |
| 15 | preserve; is that -- was that your testimony? | 18:31:33 |
| 16 | A Yeah, that's correct. | 18:31:36 |
| 17 | Q But nobody selected that footage, to your | 18:31:39 |
| 18 | knowledge? | 18:31:45 |
| 19 | A Not to my knowledge, no. | 18:31:45 |
| 20 | Q And it was never produced? | 18:31:47 |
| 21 | MS. VASQUEZ: Asked and answered. | 18:31:49 |
| 22 | THE WITNESS: Not to my knowledge, no. | 18:31:53 |

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| 1 | BY MS. STEMLAND: | 18:32:02 |
| 2 | Q And is it correct that you do not recall | 18:32:02 |
| 3 | at that time whether Amber had any signs of | 18:32:08 |
| 4 | injury? | 18:32:10 |
| 5 | MS. VASQUEZ: Objection; vague and | 18:32:11 |
| 6 | ambiguous. | 18:32:15 |
| 7 | THE WITNESS: At this moment, no, I do not | 18:32:15 |
| 8 | recall. | 18:32:18 |
| 9 | BY MS. STEMLAND: | 18:32:21 |
| 10 | Q And according to that comment, you do not | 18:32:21 |
| 11 | recall at that time; is that your understanding? | 18:32:23 |
| 12 | MS. VASQUEZ: Objection; misstates the | 18:32:26 |
| 13 | document, improper use of the document. | 18:32:29 |
| 14 | THE WITNESS: I don't recall. | 18:32:36 |
| 15 | BY MS. STEMLAND: | 18:32:37 |
| 16 | Q And you don't know the date or the time of | 18:32:37 |
| 17 | that footage? | 18:32:41 |
| 18 | MS. VASQUEZ: Vague. | 18:32:46 |
| 19 | THE WITNESS: I don't recall. And | 18:32:50 |
| 20 | obviously I can read this, but I don't recall | 18:32:52 |
| 21 | offhand. | 18:32:54 |
| 22 | BY MS. STEMLAND: | 18:32:56 |

1 CERTIFICATE OF SHORT HAND REPORTER - NOTARY PUBLIC

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

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

16 My commission expires July 31, 2024.

17 *Scott D. Gregg RPR*
18 _____

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