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

Transcript of Candie Davidson- Goldbronn, Designated Representative

Date: March 30, 2021
Case: Depp, II -v- Heard

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WORLDWIDE COURT REPORTING & LITIGATION TECHNOLOGY

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FILED
MAR 30 2021
Clerk of the Circuit Court
Fairfax County, VA

VIRGINIA

IN THE CIRCUIT COURT FOR FAIRFAX COUNTY

-----x
JOHN C. DEPP, II, :
Plaintiff, : Case No.
vs. : CL-2019-0002911
AMBER LAURA HEARD, :
Defendant. :
-----x

Videotaped Deposition of
CANDIE DAVIDSON-GOLDBRONN
Person Most Qualified For
CHILDREN'S HOSPITAL LOS ANGELES
Conducted Virtually
Tuesday, March 30, 2021

Stenographically Reported by:
LORI STOKES
CSR No. 12732
Job No. 359374
Pages 1-180

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The Videotaped Deposition of CANDIE
DAVIDSON-GOLDBRONN, was taken via videoconference
on behalf of Plaintiff, beginning at 10:03 a.m.,
Pacific Daylight Time, on March 30, 2021, before
LORI STOKES, RPR, Certified Shorthand Reporter
No. 12732.

Transcript of Candie Davidson-Goldbronn, Designated Representative
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1 APPEARANCES VIA VIDEOCONFERENCE:

2

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FOR THE DEPONENT

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1	March 30, 2021 10:03 a.m.	
2	VIA VIDEOCONFERENCE	
3		12:00:59
4	THE VIDEOGRAPHER: Here begins Tape	10:02:39
5	Number 1 in the videotaped deposition of Candie	10:02:41
6	Davidson-Goldbronn as a person most qualified at	10:02:46
7	Children's Hospital Los Angeles in the matter of	10:02:52
8	Depp v. Heard in the Fairfax County Circuit Court,	10:02:58
9	Virginia, Case Number CL-2019-0002911.	10:03:03
10	Today's date is March 30th, 2021. The	10:03:13
11	time on the video monitor is 10:03 Pacific.	10:03:17
12	The videographer today is Glen Fortner	10:03:23
13	representing Planet Depos.	10:03:28
14	All participants are attending remotely	10:03:30
15	in location.	10:03:34
16	Would counsel please voice-identify	10:03:35
17	themselves and state whom they represent.	10:03:38
18	MR. MONIZ: Good morning. Samuel Moniz	10:03:40
19	of Brown Rudnick on behalf of Mr. Depp.	10:03:44
20	MS. VASQUEZ: Good morning. Camille	10:03:49
21	Vasquez on behalf of Mr. Depp.	10:03:49
22	MS. BREDEHOFT: Good morning. Elaine	10:03:52
23	Bredehft --	10:03:52
24	MR. BLESSEY: Good morning.	10:03:52
25	MS. BREDEHOFT: -- and Clarissa --	10:03:52

Transcript of Candie Davidson-Goldbronn, Designated Representative
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1	MR. BLESSEY: Go ahead.	10:03:52
2	MS. BREDEHOFT: -- Pintado on behalf of	10:03:52
3	Amber Heard.	10:03:53
4	MR. BLESSEY: Good morning. Raymond	10:03:56
5	Blessey for the deponent.	10:03:59
6	THE VIDEOGRAPHER: The court reporter	10:04:02
7	today is Lori Stokes representing Planet Depos.	10:04:03
8	Would the reporter please swear in the	10:04:06
9	witness.	10:04:09
10		10:04:10
11	CANDIE DAVIDSON-GOLDBRONN,	10:04:10
12	having been administered an oath, was examined and	10:04:10
13	testified as follows:	10:04:10
14		10:04:10
15	MS. BREDEHOFT: It's very difficult to	10:04:34
16	hear you. I barely got the "I do."	10:04:35
17	Is it possible to move that microphone up	10:04:38
18	a little bit?	10:04:41
19	THE WITNESS: Yeah. I can speak up.	10:04:43
20	MS. BREDEHOFT: That's better. Thank	10:04:45
21	you. Thank you.	10:04:46
22	MR. MONIZ: All right. Yeah.	10:04:47
23		10:04:48
24		
25		

Transcript of Candie Davidson-Goldbronn, Designated Representative
March 30, 2021

13

1	EXAMINATION	10:04:55
2	BY MR. MONIZ:	10:04:56
3	Q All right. Well, good morning,	10:04:56
4	Ms. Goldbronn. And thank you for appearing here	10:04:57
5	today with us.	10:05:01
6	Have you ever had your deposition taken	10:05:03
7	before?	10:05:05
8	A No.	10:05:06
9	Q Okay. So given that this is your first	10:05:06
10	time being deposed, I'm going to run through just a	10:05:09
11	couple of the general ground rules just to make	10:05:15
12	sure everybody is on the same page about what we're	10:05:17
13	doing here today.	10:05:20
14	First of all, as you just heard, you were	10:05:20
15	just sworn to testify under penalty of perjury.	10:05:23
16	And so it's obviously important that you tell the	10:05:25
17	truth, even though we're all here in an informal	10:05:28
18	setting and everybody is just on a Zoom call.	10:05:32
19	Does that make sense?	10:05:35
20	A Yes.	10:05:36
21	Q Okay. As you can see, we have a court	10:05:38
22	reporter here who is transcribing what we say. To	10:05:40
23	make the reporter's life a little bit easier, there	10:05:44
24	are a few things that we need to do.	10:05:47
25	First of all, it's important that you	10:05:50

Transcript of Candie Davidson-Goldbronn, Designated Representative
March 30, 2021

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1	provide verbal responses, so a "yes" or "no" as	10:05:52
2	opposed to a nod or shake of the head.	10:05:55
3	And it's also important that you avoid	10:05:58
4	"uh-huh" and "huh-uh," because that does not	10:06:00
5	translate well on the page.	10:06:03
6	Does that all make sense?	10:06:05
7	A Yes.	10:06:07
8	Q Yes?	10:06:08
9	A Yes.	10:06:09
10	Q There are also going to be moments when	10:06:14
11	Ms. Bredehoft or your attorney interrupts to state	10:06:17
12	an objection on the record.	10:06:20
13	The purpose of those objections is	10:06:22
14	generally to just preserve -- preserve arguments	10:06:24
15	later on for trial.	10:06:27
16	As a general rule, the fact that an	10:06:29
17	objection is made does not mean that you don't have	10:06:31
18	to answer the question. So unless your attorney	10:06:35
19	specifically instructs you not to answer a	10:06:38
20	question, what you should do is just wait for the	10:06:40
21	attorneys to finish stating their objection and	10:06:43
22	then go ahead and answer the question.	10:06:45
23	Does that make sense?	10:06:47
24	A Yes.	10:06:48
25	Q Okay. If I ask at some point a confusing	10:06:49

Transcript of Candie Davidson-Goldbronn, Designated Representative
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1	question, which is all but inevitable, please just	10:06:55
2	tell me that you don't understand, and I'll try to	10:07:00
3	rephrase in a way that makes a little more sense.	10:07:02
4	I don't want you to answer any question	10:07:03
5	that you don't fully understand. But if you do	10:07:06
6	answer a question, I will assume that you have	10:07:08
7	understood that question as I've posed it.	10:07:11
8	Does that make sense?	10:07:14
9	A Yes.	10:07:15
10	Q Okay. You'll be given an opportunity to	10:07:15
11	correct this deposition transcript. You'll be	10:07:17
12	provided with a copy of the transcript that you can	10:07:20
13	review and make any corrections if you give	10:07:23
14	erroneous testimony today.	10:07:26
15	But you should be aware that the	10:07:28
16	attorneys who eventually try this case will be able	10:07:30
17	to comment at trial on any corrections and changes	10:07:33
18	that are made to your testimony, and that could	10:07:37
19	have an impact on whether the jury views you as	10:07:39
20	credible or not.	10:07:42
21	So that's just a roundabout way of saying	10:07:43
22	that it's important for you to try to be as	10:07:46
23	complete and accurate as you can with your	10:07:49
24	statements today.	10:07:50
25	Does that make sense?	10:07:52

Transcript of Candie Davidson-Goldbronn, Designated Representative
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1	A	Yes.	10:07:53
2	Q	Okay. Do you understand the difference	10:07:53
3		between an estimate and a guess?	10:07:56
4	A	Yes.	10:07:58
5	Q	Okay. I'm entitled to your best estimate	10:07:59
6		today; I don't want you to just guess, though.	10:08:04
7		So if you -- if I ask you a question, and	10:08:08
8		you just have no idea how to respond without	10:08:10
9		guessing, it's perfectly acceptable to just tell me	10:08:12
10		that. You don't need to -- you don't need to take	10:08:16
11		a guess.	10:08:19
12		And does that make sense?	10:08:20
13	A	That makes sense.	10:08:22
14	Q	Is there any reason today why you think	10:08:23
15		you would be unable to give me your best testimony?	10:08:25
16	A	No.	10:08:29
17	Q	Okay. And you haven't taken any	10:08:30
18		medication, any substance in the last 24 hours that	10:08:33
19		you believe might negatively impact your ability to	10:08:36
20		give complete and accurate responses?	10:08:40
21	A	No.	10:08:43
22	Q	All right. Did you have any meetings	10:08:47
23		with anyone to prepare for this deposition today?	10:08:49
24		MR. BLESSEY: Counsel, are you asking	10:08:54
25		other than her attorney?	10:08:56

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1	MR. MONIZ: Yes.	10:08:59
2	BY MR. MONIZ:	10:09:01
3	Q Did you have any meetings with anybody,	10:09:01
4	excepting meetings in which only you and your	10:09:03
5	attorney were present?	10:09:06
6	A Yes.	10:09:07
7	Q And with whom did you meet?	10:09:08
8	A I spoke with Ellen Cheney, who works for	10:09:13
9	Children's Hospital Los Angeles, and Tiffanie	10:09:18
10	Al-Nasser, who also works for Children's Hospital	10:09:21
11	Los Angeles.	10:09:24
12	Q Did you speak to anybody else?	10:09:31
13	A No.	10:09:32
14	Q Okay. Was counsel -- was your attorney	10:09:34
15	present for those meetings?	10:09:37
16	A No.	10:09:39
17	Q Okay. Can you tell me, generally, what	10:09:40
18	you discussed with Ms. Cheney.	10:09:43
19	A I asked if she had any communication with	10:09:51
20	either Mr. Depp or Ms. Heard since receiving the	10:09:55
21	correspondence of a gift in 2018, and she had not.	10:10:02
22	Q Okay. Was that all you discussed with	10:10:12
23	her?	10:10:14
24	A Yes.	10:10:15
25	Q Where were you when you had this	10:10:16

Transcript of Candie Davidson-Goldbrom, Designated Representative
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1	conversation?	10:10:18
2	A I was at my home on the telephone with	10:10:21
3	her.	10:10:24
4	Q Okay. About how long would you say you	10:10:24
5	spoke to her?	10:10:28
6	A Two minutes.	10:10:29
7	Q Okay. And have you described for me	10:10:30
8	everything that you can recall now that you talked	10:10:32
9	to her about?	10:10:34
10	A Yes.	10:10:36
11	Q Okay. And then you also mentioned	10:10:36
12	Tiffanie Al-Nasser.	10:10:40
13	Can you tell me about that conversation.	10:10:44
14	A I asked Tiffanie the same question I	10:10:47
15	asked Ms. Cheney, if she had any communication with	10:10:51
16	either Mr. Depp or his representative or Ms. Heard	10:10:55
17	regarding any communications around a pledge	10:10:58
18	payment for gifts since, I think, 2018. And she	10:11:04
19	had not.	10:11:13
20	And, again, I was at home on the phone.	10:11:18
21	Q Okay. It looks to me like you were	10:11:21
22	looking down at a paper there.	10:11:28
23	Do you have any papers with you?	10:11:30
24	A I have just the Honor Roll.	10:11:31
25	Q Okay.	10:11:33

Transcript of Candie Davidson-Goldbronn, Designated Representative
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1	A	I look down when I think.	10:11:34
2	Q	Understood, understood. I just wanted to	10:11:36
3		clarify for the record whether you were referring	10:11:38
4		to a document, that's all.	10:11:41
5		Okay. Other than your communications	10:11:46
6		with Ms. Cheney and Ms. Al-Nasser, did you speak to	10:11:48
7		anybody else about this deposition?	10:11:52
8	A	No.	10:11:54
9	Q	Did you review any documents in	10:11:56
10		preparation for this deposition?	10:11:58
11	A	Yes.	10:12:05
12	Q	What documents did you review?	10:12:05
13	A	The documents that were sent by CHLA as	10:12:06
14		to -- to you or to the attorneys for this case.	10:12:10
15	Q	Okay. So you're referring there to the	10:12:20
16		documents that were produced by the Children's	10:12:22
17		Hospital in response to a subpoena in, I think --	10:12:24
18	A	Correct.	10:12:29
19	Q	-- late last year; is that correct?	10:12:29
20	A	That's correct.	10:12:31
21	Q	Other than those documents, did you	10:12:33
22		review any other documents in preparation for this	10:12:35
23		deposition?	10:12:38
24	A	No.	10:12:39
25	Q	Did you review all of those documents in	10:12:39

1 preparation for this deposition, or just some of 10:12:43
2 them? 10:12:45

3 A All of them. 10:12:46

4 Q Okay. 10:12:46

5 MR. MONIZ: All right. Alex, would you 10:12:52

6 please put on the screen what we should have -- I 10:12:54

7 think it's labeled Depp 1, and it's the deposition 10:12:57

8 notice. 10:13:01

R 9 (Deposition Exhibit 1 was marked for 10:13:20

10 identification.) 10:13:20

11 MR. MONIZ: Thank you. And can you 10:13:21

12 please -- actually, can you give me control. 10:13:21

13 Well, Alex, maybe you should just take 10:13:42

14 back control, because my computer does not seem to 10:13:45

15 be cooperating. 10:13:47

16 Can you just scroll down a couple of -- a 10:13:49

17 couple of pages. I'll tell you when to stop. One 10:13:51

18 more page, I think. One more page after this, 10:13:54

19 sorry. 10:14:01

20 Perfect. Okay. 10:14:01

21 BY MR. MONIZ: 10:14:03

22 Q Ms. Goldbronn, is it your understanding 10:14:04

23 that you're here to testify today on behalf of the 10:14:05

24 Children's Hospital? 10:14:10

25 A Correct, yes. 10:14:11

1 Q Okay. And is it specifically your 10:14:12
2 understanding that you're here to testify with 10:14:14
3 respect to four particular categories of 10:14:16
4 information? 10:14:19

5 A Yes. 10:14:19

R 6 Q Okay. If you look at the screen here -- 10:14:20
7 MR. MONIZ: And, Alex, I'm sorry, can you 10:14:25
8 scroll down -- no, actually -- actually, it's fine. 10:14:27

9 BY MR. MONIZ: 10:14:29

10 Q If you look at the screen here, you'll 10:14:29
11 see these four -- these four categories. 10:14:31

12 Do you believe that you're the person 10:14:33
13 most knowledgeable from the Children's Hospital to 10:14:34
14 testify on each of these categories? 10:14:37

15 A Yes. 10:14:42

16 Q Okay. All right. 10:14:42

17 MR. MONIZ: I think we can take that 10:14:47
18 down, Alex. 10:14:49

19 BY MR. MONIZ: 10:14:59

20 Q So, Ms. Goldbronn, can you tell me just a 10:15:00
21 little bit about your personal background and 10:15:02
22 just -- let's start with just your educational 10:15:04
23 background. 10:15:07

24 Did you go to college? 10:15:08

25 A Yes. 10:15:10

1 Q And did you graduate? 10:15:12
2 A Yes. 10:15:14
3 Q Where and when did you graduate? 10:15:15
4 A San Diego State University, 1997. 10:15:21
5 Q Okay. Do you have any grad school? 10:15:25
6 A No. 10:15:30
7 Q Okay. So you went straight from -- 10:15:32
8 straight from college into the working world? 10:15:33
9 A Correct. 10:15:36
10 Q Can you give me kind of just an 10:15:37
11 overview -- and I don't need a lot of detail 10:15:40
12 here -- but just kind of an overview of what you 10:15:43
13 generally did between your graduation in '97 and 10:15:47
14 the present. 10:15:51
15 A I've worked in the nonprofit sector all 10:15:53
16 but two years. The majority of that time was 10:15:56
17 either as a frontline fundraiser, somebody who is 10:16:02
18 cultivating and soliciting gifts for nonprofits, 10:16:06
19 and worked in operations of foundations, similar to 10:16:10
20 what I'm currently doing. 10:16:19
21 And prior to working for Children's 10:16:23
22 Hospital Los Angeles, which I started in 2018, I 10:16:26
23 worked for a firm called CCS Fundraising. 10:16:29
24 (Reporter clarification.) 10:16:42
25 THE WITNESS: I did counsel -- executive 10:16:50

1 council, fundraising counsel, for clients who were 10:16:54
2 looking to create fundraising or optimize their 10:17:01
3 fundraising departments. 10:17:03
4 (Reporter clarification.) 10:17:21
5 THE WITNESS: Fundraising departments. 10:17:21
6 BY MR. MONIZ: 10:17:26
7 Q Okay. So it sounds like, for the 10:17:27
8 majority of your career, you've been focused on 10:17:31
9 fundraising for nonprofit groups. 10:17:34
10 Is that kind of a fair generalization? 10:17:36
11 A That would be fair. 10:17:40
12 Q You mentioned having worked in operations 10:17:41
13 of foundations. 10:17:44
14 Can you tell me a little bit what you 10:17:45
15 mean by that? 10:17:48
16 A Correct. So overseeing everything from 10:17:51
17 gift processing; foundation finance budgetary, for 10:17:56
18 both expenses and revenue; donor stewardships; 10:18:03
19 prospect research and management; special events; 10:18:11
20 and a database system. 10:18:17
21 Q Okay. 10:18:26
22 A That's what I would mean about 10:18:28
23 operations. 10:18:31
24 Q All right. That's fine. 10:18:31
25 And at some point, you came to work for 10:18:33

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1 the Children's Hospital? 10:18:35
2 A Correct. July 30th of 2018. 10:18:36
3 Q Okay. And what position do you hold at 10:18:41
4 the Children's Hospital? 10:18:43
5 A Associate senior vice president for 10:18:46
6 foundation operations. 10:18:49
7 Q And can you again just give me a very 10:18:52
8 quick overview of your responsibilities? 10:18:56
9 A I oversee all of the foundation 10:18:59
10 operations, including gift processing, finance, 10:19:03
11 foundation finance, prospect research and 10:19:10
12 management, donor relations and stewardships, 10:19:13
13 special events and database CRM management. 10:19:18
14 CRM is constituent relationship 10:19:25
15 management. 10:19:27
16 Q Okay. Can you tell me, generally, what 10:19:35
17 is the Children's Hospital Los Angeles of Los 10:19:37
18 Angeles? 10:19:38
19 A We're a pediatric hospital. 10:19:43
R 20 Q Okay. About how large is the 10:19:54
21 organization? 10:19:58
22 A Do you mean number of employees? 10:19:59
23 Q Sure. 10:20:01
24 A 6,000. 10:20:04
25 Q Okay. Are they all based around a single 10:20:06

R 1 location? Or does it have locations outside of 10:20:09
2 Los Angeles as well? 10:20:13
3 A We have a hospital in Los Angeles and 10:20:16
4 operate in Los Angeles. 10:20:21
5 Q Okay. Does the Children's Hospital rely 10:20:24
6 largely on donations for its operations? 10:20:29
7 MS. BREDEHOFT: Objection. Leading. 10:20:37
8 BY MR. MONIZ: 10:20:40
9 Q I'll ask it a different way. 10:20:40
10 Do you have any information about what 10:20:42
11 percentage of the Children's Hospital's funding 10:20:43
12 comes from donations? 10:20:47
13 MR. BLESSEY: I'm going to just object 10:20:49
14 that it lacks foundation. It may well call for 10:20:50
15 speculation. 10:20:55
16 Go ahead. 10:20:55
17 MS. BREDEHOFT: And hearsay. Let me put 10:20:59
18 in hearsay. Foundation. 10:21:01
19 Go ahead. 10:21:02
20 THE WITNESS: So CHLA operates about a 10:21:04
21 billion dollars. And the foundation, which is the 10:21:08
22 fundraising arm, brings in between 80 to 10:21:11
23 150 million annually. 10:21:15
24 BY MR. MONIZ: 10:21:18
25 Q And what are you -- what are you basing 10:21:19

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IU	1	that number on?	10:21:20
	2	MS. BREDEHOFT: Objection. Hearsay.	10:21:23
	3	Authenticity. Foundation.	10:21:26
	4	Go ahead.	10:21:28
IU	5	THE WITNESS: Annual audits.	10:21:32
	6	BY MR. MONIZ:	10:21:34
	7	Q Are you personally -- I think you've	10:21:37
	8	previously testified that you are -- you're	10:21:39
	9	generally personally involved in the fundraising	10:21:41
	10	aspects of the Children's Hospital; is that	10:21:44
	11	correct?	10:21:47
	12	MS. BREDEHOFT: Objection. Leading.	10:21:49
	13	BY MR. MONIZ:	10:21:50
	14	Q Are you personally involved in the	10:21:52
	15	fundraising aspects of the Children's Hospital?	10:21:52
	16	MS. BREDEHOFT: Objection. Leading.	10:21:56
	17	THE WITNESS: Can you clarify by	10:21:57
	18	"fundraising."	10:21:58
	19	BY MR. MONIZ:	10:22:03
	20	Q Well, do your job responsibilities deal	10:22:03
	21	with the donation side of the Children's Hospital's	10:22:07
	22	finances?	10:22:13
	23	A I just need clarification.	10:22:17
	24	Q Sure. So I think you testified that your	10:22:25
	25	job responsibilities including -- in your current	10:22:27

1 position as vice president include things such as 10:22:32
2 donor relations. 10:22:35
3 Do I have that correct? 10:22:36
4 A Correct. 10:22:37
5 Q Okay. What does "donor relations" mean? 10:22:38
6 A Donor relations means creating and 10:22:41
7 producing acknowledgment letters and thank-you 10:22:47
8 gifts for donors who have made gifts to Children's 10:22:50
9 Hospital Los Angeles. 10:22:55
10 Q Okay. And when would an acknowledgment 10:22:58
11 letter or a thank-you letter be generated and sent 10:23:01
12 to a donor? 10:23:04
13 Are -- let me ask it this way. 10:23:05
14 Are acknowledgment letters sent to all 10:23:08
15 donors? 10:23:11
16 MS. BREDEHOFT: Objection. Leading. 10:23:12
17 Foundation. Hearsay. And outside the scope. 10:23:13
18 MR. BLESSEY: You can answer if you 10:23:23
19 understand the question. 10:23:24
20 THE WITNESS: It's our -- it is our -- we 10:23:31
21 strive to produce a thank-you letter to all donors 10:23:33
22 who make a gift of \$10 or more to Children's 10:23:39
23 Hospital Los Angeles. 10:23:42
24 MR. MONIZ: Okay. 10:23:50
25 Alex, could I please see -- I think it's 10:23:51

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1 labeled Depp 2 -- on the screen. 10:23:55
2 (Deposition Exhibit 2 was marked for 10:23:58
3 identification.) 10:23:58
4 MS. BREDEHOFT: Before you get into that, 10:24:16
5 I want to make a very substantial objection. 10:24:17
6 Forty-five minutes before this 10:24:21
7 deposition, Mr. Moniz emailed me a number of 10:24:24
8 exhibits saying that he intended to use them here. 10:24:27
9 They've not been produced in discovery. 10:24:31
10 They were clearly asked for. And, obviously, 10:24:31
11 Mr. Depp's team believes that they are relevant. 10:24:33
12 This is not uncommon, unfortunately, for 10:24:37
13 Mr. Depp's legal team. They have repeatedly 10:24:41
14 provided, at the last minute, documents, including 10:24:42
15 during depositions. 10:24:44
16 I object completely to the use of any of 10:24:45
17 these documents as being produced too late. I also 10:24:48
18 object to this on the basis that -- authenticity. 10:24:53
19 Foundation. And hearsay. And it's outside the 10:24:55
20 scope of this witness's testimony. 10:24:59
21 This is clearly something that's coming 10:25:02
22 from an article, and it's not written by this 10:25:04
23 witness, and it's inappropriate for all of those 10:25:07
24 reasons. 10:25:10
25 MR. MONIZ: And I'm just going to briefly 10:25:15

1	respond to that, if I may.	10:25:17
2	The documents in question that	10:25:18
3	Ms. Bredehoft is referring to were obtained by	10:25:20
4	Mr. Depp in the last, I would say, day or so, in	10:25:23
5	preparation for this deposition. They were not	10:25:26
6	identified for use in this deposition previously.	10:25:30
7	They were not in my possession previously.	10:25:33
8	These documents are obtained from	10:25:36
9	publicly available sources that are equally	10:25:38
10	available to Ms. Heard. They are not, as far as I	10:25:40
11	can tell, responsive to any request that Ms. Heard	10:25:44
12	has previously served.	10:25:48
13	Even if they were responsive, Mr. Depp	10:25:50
14	would not have been under any obligation whatsoever	10:25:52
15	to search out and obtain, from publicly available	10:25:54
16	sources, documents to produce to Ms. Heard if they	10:25:59
17	were not already in his possession.	10:26:03
18	There is nothing inappropriate whatsoever	10:26:05
19	in the production of these documents to Ms. Heard	10:26:05
20	upon our obtaining them for use in this deposition.	10:26:05
21	Any suggestion that these documents were	10:26:10
22	improperly withheld is neither factual nor	10:26:13
23	appropriate. And we strenuously take exception to	10:26:16
24	the comments that were just made.	10:26:21
25	That being said, I don't see any benefit	10:26:23

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1 to continuing to go back and forth on it on the 10:26:26
2 record. We can address Ms. Bredehoft's objections 10:26:31
3 at a later date, if she wishes. 10:26:34
4 For the time being, however, I am going 10:26:37
5 to proceed with the deposition. 10:26:37
6 MR. BLESSEY: Counsel, before you do, 10:26:37
7 this is Mr. Blessey. At the beginning of the 10:26:39
8 deposition, you showed the deponent the deposition 10:26:41
9 notice. You referred her to the four categories 10:26:45
10 that she has been designated as the PMK. 10:26:49
11 I have not heard your questions yet about 10:26:53
12 Exhibit 2. However, the way we're going to work 10:26:56
13 this deposition is we're going to limit this 10:26:59
14 deponent to the topics that she has been designated 10:27:01
15 on. 10:27:05
16 So please bear that in mind, and we'll 10:27:05
17 see how we go -- how this goes down the road here. 10:27:09
18 But please bear in mind, the four 10:27:13
19 categories that you have asked us to produce this 10:27:17
20 witness, she will not go beyond these categories at 10:27:19
21 this deposition. And I'm confident you understand 10:27:23
22 that. 10:27:26
23 MR. MONIZ: Well, thank you, Mr. Blessey. 10:27:26
24 We can address any concerns you have 10:27:27
25 about the scope on a question-by-question basis, 10:27:30

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1	but I anticipate that the questions will all be	10:27:32
2	fully appropriate and within the scope of the	10:27:35
3	categories for which this witness was designated.	10:27:37
4	All right. Is everybody ready to	10:27:44
5	proceed?	10:27:45
6	MR. BLESSEY: Go ahead.	10:27:49
7	BY MR. MONIZ:	10:27:50
8	Q Ms. Goldbronn, are you familiar with an	10:27:51
9	individual named Johnny Depp?	10:27:52
10	A Yes.	10:27:56
11	Q Are you familiar with an individual named	10:27:59
12	Amber Heard?	10:28:02
13	A Yes.	10:28:03
14	Q Do you know generally who they are?	10:28:05
15	A Yes.	10:28:13
16	Q Okay. Do you know anything about their	10:28:13
17	personal relationship?	10:28:15
18	A No.	10:28:17
19	Q Have you ever met either one of them?	10:28:18
20	A No.	10:28:21
21	Q Okay. Are you aware that they divorced	10:28:22
22	in 2016?	10:28:25
23	A Yes.	10:28:29
24	Q Okay. How did you become aware that they	10:28:31
25	divorced in 2016?	10:28:35

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1	MS. BREDEHOFT: I'm going to say	10:28:38
2	objection. Outside the scope of the designations,	10:28:40
3	the designated categories.	10:28:43
4	MR. BLESSEY: I would join in that	10:28:50
5	objection.	10:28:51
6	Counsel, where are we going with this?	10:28:52
7	I think she's here to testify about the	10:28:55
8	four categories; not the date of the divorce or any	10:28:57
9	other personal relationship between Mr. Depp and	10:29:01
10	Ms. Heard, with all due regard.	10:29:04
11	MR. MONIZ: And I appreciate that, and	10:29:06
12	I'm getting there. I just wanted to know,	10:29:07
13	generally speaking, what the witness's familiarity	10:29:10
14	with that topic was.	10:29:13
15	Are you instructing her not to answer?	10:29:15
16	MR. BLESSEY: I'm instructing her to	10:29:18
17	limit her testimony to the four topics that have	10:29:20
18	been identified for this deposition.	10:29:22
19	Your last question does not, in my	10:29:24
20	view -- again, with all due regard -- fit into any	10:29:27
21	of those four categories.	10:29:31
22	If you want to give me an offer -- go	10:29:33
23	ahead.	10:29:35
24	MR. MONIZ: Well, that was a little bit	10:29:36
25	ambiguous.	10:29:38

1	So can you tell me, one way or the other,	10:29:40
2	whether you are instructing her not to answer?	10:29:42
3	MR. BLESSEY: Yes, I am.	10:29:46
4	BY MR. MONIZ:	10:29:48
5	Q Okay. And are you going to follow your	10:29:48
6	attorney's instruction?	10:29:50
7	MR. BLESSEY: You know what? This is the	10:29:52
8	way we're going to work this: I'm her attorney.	10:29:53
9	If I give her a recommendation or an instruction,	10:29:56
10	she will follow it. And she will not answer the	10:29:57
11	last question you just asked her.	10:30:00
12	MR. MONIZ: You're directing her not	10:30:02
13	to --	10:30:03
14	MR. BLESSEY: Counsel --	10:30:04
15	MR. MONIZ: Hang on.	10:30:04
16	MR. BLESSEY: I'm directing her not to	10:30:06
17	answer the last question. I have already	10:30:07
18	represented on the record I am her counsel. She	10:30:11
19	will follow my instruction.	10:30:11
20	This is silly. Let's get to the four	10:30:11
21	categories --	10:30:14
22	MR. MONIZ: We are getting there.	10:30:16
23	MR. BLESSEY: -- so you can get your	10:30:16
24	information.	10:30:17
25	MR. MONIZ: Counsel --	10:30:18

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1 MR. BLESSEY: Okay. Let's go. 10:30:18
2 MR. MONIZ: Counsel, we are getting 10:30:20
3 there. 10:30:21
4 However, I want it clearly understood 10:30:21
5 that if you are instructing your witness not to 10:30:23
6 answer, I want it clear that the witness is 10:30:25
7 following that instruction, and I don't want there 10:30:28
8 to be a debate later on about whether that 10:30:30
9 instruction was actually followed. 10:30:33
10 So I'm simply asking to clarify from the 10:30:34
11 witness that she's going to follow your 10:30:38
12 instruction. And then if she clarifies that, I 10:30:40
13 will move on. 10:30:43
14 MR. BLESSEY: Counsel, what you are 10:30:45
15 trying to do and what you -- the goal of what 10:30:47
16 you're trying to do is your business. 10:30:48
17 I'm telling you again, for the third 10:30:51
18 time, I am her attorney. If I instruct her not to 10:30:52
19 answer, she will not answer. And that's including 10:30:57
20 the last question that you're trying to get an 10:31:00
21 answer to. 10:31:02
22 So let's please move on. 10:31:03
23 MR. MONIZ: All right. I think it's 10:31:05
24 clear from the record that the instruction not to 10:31:07
25 answer has been given. And I take it, from the 10:31:08

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1	silence, that it's going to be followed.	10:31:12
2	MR. BLESSEY: Well, you can interpret --	10:31:15
3	MR. MONIZ: Let's -- let's -- okay. I'm	10:31:16
4	not going to keep debating, Mr. Blessey.	10:31:17
5	Alex, can you please scroll down a little	10:31:21
6	bit.	10:31:24
7	MR. BLESSEY: If I can suggest, you might	10:31:26
8	start by laying a foundation that relates to the	10:31:28
9	four topics, and that might help move things along.	10:31:32
10	MR. MONIZ: All right.	10:31:38
11	Alex, just -- actually, that's perfect.	10:31:38
12	BY MR. MONIZ:	10:31:41
13	Q All right. So, Ms. Goldbronn, I'm just	10:31:42
14	going to read from this document briefly.	10:31:43
15	MS. BREDEHOFT: I'm going to object to	10:31:46
16	your reading from the document. You've not	10:31:47
17	established any kind of foundation that this	10:31:50
18	witness has any knowledge about this document. It	10:31:52
19	would be hearsay, authenticity, and foundation.	10:31:55
20	In addition, I don't see this relating to	10:32:00
21	any of the four categories that are listed in your	10:32:02
22	deposition Exhibit Number 1.	10:32:05
23	MR. MONIZ: Thank you, Counsel.	10:32:07
24	MR. BLESSEY: I would join on the issue	10:32:08
25	of -- I'm sorry. Go ahead, Counsel.	10:32:10

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1	MR. MONIZ: I beg your pardon,	10:32:14
2	Mr. Bléssey. I did not mean to step on your	10:32:16
3	objection. Please proceed.	10:32:18
4	MR. BLESSEY: No. I just said I'm	10:32:20
5	joining on the objection -- or at least the aspect	10:32:22
6	of the objection as to it lacks foundation.	10:32:25
7	Thank you for that courtesy.	10:32:27
8	MR. MONIZ: All right.	10:32:30
9	All right. Now, subject to that	10:32:30
10	objection, I'm going to read from this document:	10:32:31
11	"In a press release sent out on	10:32:34
12	Thursday, Amber Heard announced	10:32:36
13	that she would be donating her	10:32:39
14	entire \$7 million settlement from	10:32:41
15	Depp to the American Civil	10:32:44
16	Liberties Union, 'with a particular	10:32:45
17	focus to stop violence against	10:32:50
18	women,' and the Children's Hospital	10:32:53
19	Los Angeles of Los Angeles.	10:32:55
20	'As described in the restraining	10:32:55
21	order and divorce settlement, money	10:32:58
22	played no role for me personally	10:33:00
23	and never has, except to the extent	10:33:03
24	that I could donate it to charity	10:33:06
25	and, in doing so, hopefully help	10:33:08

1 those less able to defend 10:33:11
2 themselves,' Heard said. 'As 10:33:14
3 reported in the media, the amount 10:33:16
4 received in the divorce was 10:33:18
5 \$7 million and \$7 million is being 10:33:19
6 donated. This is over and above 10:33:23
7 any funds that I have given away in 10:33:25
8 the past and will continue to give 10:33:28
9 away in the future.'" 10:33:30
10 BY MR. MONIZ: 10:33:32
11 Q Now, Ms. Goldbronn, have you -- were you 10:33:34
12 reading along with what I just said? 10:33:34
13 MS. BREDEHOFT: Objection to the form of 10:33:35
14 the question. It's leading. And I'm objecting to 10:33:35
15 your reading from a document that has not 10:33:35
16 authenticity. It's hearsay. And has not 10:33:35
17 established any foundation. And, again, outside 10:33:35
18 the scope of the four categories. 10:33:37
19 MR. BLESSEY: I'm not sure, Counsel, what 10:33:41
20 the relevance is of whether or not she was reading 10:33:42
21 along. 10:33:45
22 BY MR. MONIZ: 10:33:46
23 Q Okay. Let me put it to you this way: 10:33:46
24 Have I correctly read what was in front of you? 10:33:48
25 MS. BREDEHOFT: Objection. That's 10:33:52

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1 leading. And, again, it's seeking her to speak to 10:33:53
2 something that you've not established any 10:33:56
3 authenticity to. And it's hearsay. Foundation. 10:33:58
4 As well as outside the scope. 10:34:01
5 MR. BLESSEY: I mean, the document speaks 10:34:05
6 for itself, I guess, would be my objection. 10:34:07
7 BY MR. MONIZ: 10:34:11
8 Q You can answer, Ms. Goldbronn. I haven't 10:34:11
9 heard an instruction not to. 10:34:14
10 A Yes, I was reading. 10:34:16
11 Q Okay. 10:34:19
12 Are you generally familiar with the 10:34:19
13 concept that, in August of 2016, Ms. Heard publicly 10:34:23
14 indicated that she was going to donate the 10:34:30
15 \$7 million to two charities; one of which was the 10:34:33
16 Children's Hospital Los Angeles of Los Angeles? 10:34:38
17 MS. BREDEHOFT: Objection. Hearsay. 10:34:39
18 Leading. Foundation. And if it was referring to 10:34:41
19 anything in particular, authenticity. 10:34:44
20 MR. BLESSEY: If you understand what he's 10:34:55
21 asking, go ahead and respond. 10:34:56
22 THE WITNESS: Could you rephrase that. 10:34:59
23 BY MR. MONIZ: 10:35:00
24 Q Sure. 10:35:01
25 How about this: Are you generally 10:35:01

1 familiar with the subject matter of this article, 10:35:03
2 of what I just read? 10:35:05
3 MS. BREDEHOFT: Objection. Leading. 10:35:07
4 Hearsay. Foundation. And outside the scope. 10:35:09
5 MR. BLESSEY: Counsel, I want you to get 10:35:13
6 your answer, but that question is overly broad the 10:35:15
7 way it was phrased. So I think she's going to have 10:35:18
8 a hard time answering because it is so general. 10:35:23
9 She's here to talk about the donations or 10:35:26
10 the pledges to Children's Hospital. And this 10:35:29
11 article is seeking to deal with other issues. And 10:35:32
12 so I also have an issue about this being outside 10:35:36
13 the scope of her designation. 10:35:40
14 MR. MONIZ: All right. 10:35:42
15 MR. BLESSEY: Go ahead. 10:35:43
16 MR. MONIZ: This article is very clearly 10:35:43
17 well within the parameters of the designation, and 10:35:44
18 I think that this objection has been well stated at 10:35:47
19 this point. The judge can certainly sort it out 10:35:50
20 down the line. But at this point, I would like the 10:35:53
21 witness to answer the question. 10:35:56
22 MS. BREDEHOFT: Same objections. 10:35:58
23 MR. BLESSEY: If she understands -- 10:35:59
24 right. If she understands your question. It's 10:36:00
25 overly broad. Vague and ambiguous. 10:36:00

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1 MS. BREDEHOFT: And, again, hearsay. 10:36:02
2 Leading. Foundation. Outside the scope. 10:36:03
3 BY MR. MONIZ: 10:36:07
4 Q You can answer, Ms. Goldbronn. 10:36:08
5 A Can you clarify your question. 10:36:09
6 Q Okay. Are you aware that Ms. Heard, at 10:36:14
7 some point, pledged to donate money to Children's 10:36:17
8 Hospital? 10:36:23
9 MS. BREDEHOFT: Objection. Leading. 10:36:24
10 Hearsay. Foundation. 10:36:25
11 Go ahead. 10:36:27
12 THE WITNESS: Yes. 10:36:28
13 BY MR. MONIZ: 10:36:31
14 Q When did you become aware of that? 10:36:32
15 MS. BREDEHOFT: Objection. Foundation. 10:36:39
16 Hearsay. 10:36:40
17 Go ahead. 10:36:41
18 THE WITNESS: In 2019 -- excuse me -- 10:36:43
19 2018, when I was pulling pledge payments overdue 10:36:46
20 reports. 10:36:56
21 BY MR. MONIZ: 10:36:57
22 Q I'm sorry, I didn't get the -- I 10:36:58
23 apologize. I didn't quite catch -- catch your 10:37:00
24 answer. Can you please repeat that. 10:37:02
25 A In 2018, I became familiar that there was 10:37:04

1 a pledge. 10:37:09
2 (Reporter clarification.) 10:37:33
3 THE WITNESS: In 2018, I became familiar 10:37:37
4 with this pledge. 10:37:38
5 BY MR. MONIZ: 10:37:44
6 Q And what do you mean when you used the 10:37:46
7 phrase "this pledge"? 10:37:47
8 MS. BREDEHOFT: Objection. Hearsay. 10:37:51
9 Foundation. 10:37:53
10 Go ahead. 10:37:54
11 THE WITNESS: There was a \$3 million 10:37:56
12 pledge made by Ms. Heard to Children's Hospital 10:37:58
13 Los Angeles. 10:38:02
14 BY MR. MONIZ: 10:38:08
15 Q And how did you become aware of that 10:38:09
16 pledge? 10:38:12
17 MS. BREDEHOFT: Objection. Hearsay. 10:38:13
18 Foundation. 10:38:14
19 Go ahead. 10:38:14
20 MR. BLESSEY: Actually, asked and 10:38:16
21 answered. 10:38:16
22 But you can tell him again. 10:38:17
23 THE WITNESS: In 2018, I looked at a 10:38:18
24 pledge payment report, and Ms. Heard's name was on 10:38:22
25 it. 10:38:28

1 MS. BREDEHOFT: And I would object and 10:38:32
2 move to strike on the basis of hearsay, foundation, 10:38:33
3 and not best evidence. 10:38:36

4 BY MR. MONIZ: 10:38:44

5 Q To your knowledge, in August of 2016, did 10:38:45
6 Ms. Heard or her representatives have any 10:38:46
7 communications with the Children's Hospital about 10:38:49
8 these donations? 10:38:51

9 MS. BREDEHOFT: Objection. Leading. 10:38:53
10 Hearsay. And foundation. 10:38:54

11 Go ahead. 10:38:57

12 THE WITNESS: Not that I'm aware. 10:39:00

13 BY MR. MONIZ: 10:39:03

14 Q Okay. Are you aware of any 10:39:03

IU 15 communications in 2016 between Ms. Heard or her 10:39:10
16 representatives, on the one hand, and the 10:39:13
17 Children's Hospital, on the other hand, regarding 10:39:15
18 this pledge? 10:39:17

19 MS. BREDEHOFT: Objection. Hearsay. 10:39:18
20 Foundation. 10:39:20

21 Go ahead. 10:39:21

IU 22 THE WITNESS: Not to my knowledge. 10:39:22

23 BY MR. MONIZ: 10:39:24

24 Q Would you have been personally 10:39:30
25 involved -- I mean -- well, you didn't join 10:39:30

1 Children's Hospital until 2018, correct? 10:39:33

2 A Correct. I joined CH- -- Children's 10:39:35

3 Hospital Los Angeles in 2018. 10:39:37

4 Q Okay. In the course of preparing for 10:39:38

5 this deposition, did you inquire of anybody about 10:39:42

6 whether there had been communications with 10:39:44

7 Ms. Heard in that time frame? 10:39:47

8 A Yes. With Tiffanie Al-Nasser and Ellen 10:39:51

9 Cheney, both who worked at Children's Hospital 10:39:57

10 Los Angeles at that time. 10:40:00

11 Q That's right. And those are the two -- 10:40:04

12 those are the two individuals that you identified 10:40:05

13 previously? And -- 10:40:07

14 A Correct. 10:40:09

15 Q And their response was that, no, they 10:40:09

16 hadn't? 10:40:13

17 A They had not had any other communications 10:40:14

18 with Ms. Heard or Mr. Depp since then. 10:40:16

19 Q Do you know when the Children's Hospital 10:40:27

20 became aware of this pledge? 10:40:30

21 MS. BREDEHOFT: Objection. Foundation. 10:40:32

22 Hearsay. 10:40:33

23 Go ahead. 10:40:34

24 THE WITNESS: In 2016, approximately, 10:40:35

25 August of 2016. 10:40:38

1 BY MR. MONIZ: 10:40:44

2 Q And do you know how the Children's 10:40:45

3 Hospital became aware of this pledge in August of 10:40:46

4 2016? 10:40:49

5 MS. BREDEHOFT: Objection. Hearsay. 10:40:49

6 Foundation. 10:40:49

7 Go ahead. 10:40:53

8 THE WITNESS: Children's Hospital 10:40:55

9 Los Angeles received a check for \$100,000 with 10:40:55

10 information that it was to be a gift and 10:41:01

11 establishing the pledge for Ms. Heard. 10:41:13

12 MS. BREDEHOFT: Objection. Move to 10:41:17

13 strike. Hearsay. Foundation. Not best evidence. 10:41:18

14 BY MR. MONIZ: 10:41:21

15 Q So to your knowledge, prior to the 10:41:22

16 receipt of a check, the Children's Hospital was not 10:41:24

17 aware of the pledge? 10:41:28

18 MS. BREDEHOFT: Objection. Leading. 10:41:30

19 Hearsay. Foundation. 10:41:32

20 Go ahead. 10:41:33

21 THE WITNESS: To my knowledge, no. 10:41:35

22 MR. MONIZ: Alex, can I see -- I think 10:42:04

23 it's Depp 4 on the screen, please. 10:42:09

24 THE STENOGRAPHER: Are you going to mark 10:42:21

25 this as Exhibit 3 or as Exhibit 4? 10:42:22

1 MR. MONIZ: Oh, yes. Yes. Well, 10:42:26
2 actually, let me -- let me see what Depp 4 is, 10:42:27
3 first, before I tell you. 10:42:31
4 Yeah, let's mark this as Exhibit 3. 10:42:34
5 (Deposition Exhibit 3 was marked for 10:42:38
6 identification.) 10:42:38
7 BY MR. MONIZ: 10:42:51
8 Q All right. Ms. Goldbronn, you see what's 10:42:51
9 in front of you has been marked as Exhibit 3. 10:42:53
10 Are you familiar with this document? 10:42:56
11 A Yes. 10:42:58
12 Q What is this document? 10:42:58
13 MS. BREDEHOFT: Objection. Calls for 10:43:01
14 hearsay. Foundation. And authenticity. 10:43:02
15 Go ahead, please. 10:43:06
16 THE WITNESS: The document is a letter 10:43:10
17 from Mr. Edward White to Tiffanie Al-Nasser, to 10:43:13
18 Children's Hospital Los Angeles, informing us that 10:43:23
19 there's a gift of \$100,000 made to Children's 10:43:30
20 Hospital Los Angeles in the name of Ms. Amber 10:43:33
21 Heard. 10:43:35
22 BY MR. MONIZ: 10:43:38
23 Q All right. I'll ask -- 10:43:38
24 A And that the check for -- 10:43:38
25 Q I'm sorry. I didn't realize you were 10:43:42

1 still going. 10:43:44
2 Please continue. 10:43:45
3 A And the check represents the first of 10:43:45
4 multiple scheduled installments. 10:43:48
5 Q Okay. 10:43:52
6 MR. MONIZ: Alex, would you please scroll 10:43:54
7 down to the bottom of this page. 10:43:56
8 A little further. Just a shade further. 10:44:03
9 I want to get the Bates stamp at the bottom there. 10:44:14
10 THE REMOTE TECHNICIAN: This is Alex, the 10:44:19
11 tech speaking. My apologies, Mr. Moniz. 10:44:21
12 Unfortunately, my interface won't let me 10:44:25
13 get any further down. I can -- I don't know if 10:44:27
14 it's my place. I can read it to you. I don't know 10:44:30
15 if anyone else on the call can see it. 10:44:36
16 THE STENOGRAPHER: I can see it. 10:44:39
17 MS. BREDEHOFT: I can see it as well. 10:44:40
18 MR. MONIZ: Okay. Actually, now I can 10:44:43
19 see it as well. That's fine. 10:44:44
20 BY MR. MONIZ: 10:44:45
21 Q Ms. Goldbronn, do you see down there, at 10:44:46
22 the bottom right-hand corner, it says -- there's a 10:44:47
23 stamp that says "CHLA000002"? 10:44:48
24 A Yes. 10:44:53
25 Q Okay. What do you understand that means, 10:44:57

1	if anything?	10:44:59
2	A I don't know.	10:45:00
3	Q Okay. Was this document produced as part	10:45:02
4	of Children's Hospital's document production?	10:45:06
5	MS. BREDEHOFT: Objection. Leading.	10:45:10
6	Hearsay. Foundation.	10:45:12
7	Go ahead.	10:45:15
8	THE WITNESS: Yes.	10:45:16
9	BY MR. MONIZ:	10:45:17
10	Q Did you have any role in producing the	10:45:18
11	documents as part of the Children's Hospital's	10:45:20
12	document production?	10:45:25
13	MS. BREDEHOFT: Objection. Leading.	10:45:26
14	THE WITNESS: Yes.	10:45:29
15	BY MR. MONIZ:	10:45:30
16	Q Okay. Was this document located in the	10:45:31
17	Children's Hospital's files?	10:45:33
18	MS. BREDEHOFT: Objection. Leading.	10:45:34
19	Hearsay. And foundation.	10:45:35
20	THE WITNESS: Yes.	10:45:41
21	BY MR. MONIZ:	10:45:42
22	Q Okay. Do you know who located it?	10:45:42
23	MS. BREDEHOFT: Objection. Leading.	10:45:44
24	Hearsay. Foundation.	10:45:45
25	THE WITNESS: Yes. I did.	10:45:49

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1	BY MR. MONIZ:	10:45:51
2	Q You did, okay.	10:45:52
3	All right. And so is this -- is this the	10:45:53
4	type of document that's regularly maintained by the	10:45:55
5	Children's Hospital?	10:45:58
6	MS. BREDEHOFT: Objection. Leading.	10:45:59
7	THE WITNESS: Yes.	10:46:02
8	BY MR. MONIZ:	10:46:03
9	Q Is it consistent with the custom and	10:46:04
10	practice of the Children's Hospital to retain	10:46:06
11	letters and communications reflecting large	10:46:09
12	donations?	10:46:12
13	MS. BREDEHOFT: Objection. Leading.	10:46:13
14	Hearsay. And foundation.	10:46:15
15	THE WITNESS: Yes.	10:46:17
16	BY MR. MONIZ:	10:46:21
17	Q Okay. Prior to the receipt of this --	10:46:22
18	prior to the receipt of this document, do you know	10:46:28
19	if the Children's Hospital was aware that Ms. Heard	10:46:34
20	had pledged to donate \$3 1/2 million to the	10:46:38
21	Children's Hospital?	10:46:44
22	MS. BREDEHOFT: Objection. Leading.	10:46:45
23	Hearsay. And foundation.	10:46:46
24	Go ahead.	10:46:48
25	THE WITNESS: I'm unaware.	10:46:51

1 MR. MONIZ: I'm going to scroll up -- can 10:47:00
2 we scroll up a little bit, Alex, to the -- so we 10:47:02
3 can see the text. 10:47:05
4 Okay. 10:47:06
5 BY MR. MONIZ: 10:47:07
6 Q Is Ms. -- and this letter is directed to 10:47:07
7 Ms. Al-Nasser. 10:47:12
8 And you testified previously that you 10:47:13
9 spoke to Ms. Al-Nasser in preparation for this 10:47:13
10 deposition. 10:47:13
11 Is Ms. Al-Nasser still employed by the 10:47:14
12 Children's Hospital? 10:47:18
13 A She is. 10:47:20
14 Q In what capacity? 10:47:25
15 A She's a fundraiser within the Children's 10:47:25
16 Hospital Los Angeles Foundation. 10:47:29
17 Q Okay. There's a reference here to a 10:47:35
18 check for -- well, I'll just read it: 10:47:36
19 "Enclosed is a check in the amount 10:47:37
20 of \$100,000." 10:47:39
21 Did the Children's Hospital of 10:47:41
22 Los Angeles receive a check for \$100,000 from 10:47:42
23 Mr. White in this time frame? 10:47:45
24 MS. BREDEHOFT: Objection. 10:47:50
25 THE WITNESS: Yes. 10:47:50

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1	MS. BREDEHOFT: Leading. Hearsay.	10:47:51
2	Foundation.	10:47:52
3	Go ahead.	10:47:53
4	THE WITNESS: Yes.	10:47:54
5	BY MR. MONIZ:	10:48:15
6	Q Okay. Do you know whether the Children's	10:48:16
O,R, F/A, PK	7 Hospital issued any public statements regarding	10:48:16
8 this pledge in this time frame, this August time		10:48:20
9 frame?		10:48:24
10	MS. BREDEHOFT: Objection. Leading.	10:48:25
11	Foundation. Hearsay. Outside scope.	10:48:26
12	Go ahead.	10:48:30
O,R, F/A, PK	13 THE WITNESS: I'm unaware.	10:48:38
14	BY MR. MONIZ:	10:48:39
15	Q Okay. Do you have any opinion on whether	10:48:39
16	it's typical to issue statements with respect to	10:48:41
17	large donations in the \$3 million range?	10:48:46
18	MS. BREDEHOFT: Objection. Hearsay.	10:48:51
19	Leading. Foundation. Calls for speculation. And	10:48:52
20	hypothetical.	10:48:54
21	MR. BLESSEY: I would join -- this is	10:48:55
22	Blessey. I would join with the lack of foundation.	10:48:57
23	Calls for speculation.	10:49:01
24	Go ahead, if you understand what he's	10:49:02
25	asking.	10:49:03

1	THE WITNESS: Actually, could you -- I	10:49:04
2	don't understand. Could you be more specific.	10:49:06
3	BY MR. MONIZ:	10:49:10
4	Q Sure. I'm just wondering, just as a	10:49:11
5	general matter -- not necessarily restricted to	10:49:13
6	this donation, but just as a general matter, in	10:49:16
7	your experience, is it common for the Children's	10:49:19
8	Hospital to issue public statements recognizing	10:49:21
9	donors who have given generously?	10:49:26
10	MS. BREDEHOFT: Objection. Leading.	10:49:30
11	Hearsay. Foundation. Calls for a hypothetical as	10:49:31
12	well.	10:49:36
13	MR. BLESSEY: It's also vague as to time	10:49:37
14	frame.	10:49:39
15	But go ahead.	10:49:40
16	THE WITNESS: If you're talking general,	10:49:44
17	not in the case of this, it really -- it depends on	10:49:46
18	the donor and the donor's intent and if they are	10:49:53
19	looking for publicity. It's generally not	10:49:57
20	something the organizations do.	10:50:02
21	MR. MONIZ: Okay.	10:50:14
22	Can I see Depp 3 on the screen.	10:50:15
23	MS. BREDEHOFT: Sam, I think you made	10:50:21
24	this Depp Number 3. So I think you've got to --	10:50:22
25	MR. MONIZ: Well, I marked that as	10:50:24

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1 Exhibit 3, but, unfortunately, the exhibits Alex 10:50:25
2 had, one of them is labeled Depp 3. 10:50:31
3 I go out of my way to be confusing. I 10:50:35
4 apologize. 10:50:38
5 (Deposition Exhibit 4 was marked for 10:50:39
6 identification.) 10:50:39
7 MR. MONIZ: All right. And, Alex, if you 10:50:50
8 can scroll down to the second page of this 10:50:52
9 document, please. 10:50:54
10 MS. BREDEHOFT: And while you're doing 10:50:55
11 that, again, this is one of the documents that was 10:50:56
12 produced 45 minutes before this deposition. It 10:50:59
13 does not -- it's not related to the topic areas. 10:51:01
14 It doesn't have authenticity or foundation. It's 10:51:03
15 hearsay. Improperly provided at the last minute. 10:51:07
16 And I don't -- I think it's outside the 10:51:12
17 scope of what this witness could testify to, unless 10:51:14
18 this witness said she wrote this article and it 10:51:17
19 relates to the four topic areas. 10:51:21
20 MR. MONIZ: And I'm just going to again 10:51:23
21 respond for the record that, Counsel, you have not 10:51:24
22 asked for these documents. They are not responsive 10:51:27
23 to Ms. Heard's document requests, and they were not 10:51:30
24 previously obtained by Mr. Depp. 10:51:35
25 They were obtained from publicly 10:51:37

1	available sources that are equally available to	10:51:39
2	Ms. Heard. And Ms. Heard has been well aware of	10:51:39
3	this issue now for many months, and is well capable	10:51:42
4	of searching out such articles on her own.	10:51:46
5	Scroll down a little farther, please,	10:51:50
6	Alex.	10:51:53
7	MR. BLESSEY: And, Counsel, while you're	10:51:54
8	scrolling, same word of caution. We need to limit	10:51:55
9	this deposition to the four topics. And I know	10:51:58
10	you're well aware of that.	10:52:00
11	I will wait and see where you're going	10:52:02
12	with this particular exhibit before I object	10:52:04
13	further.	10:52:08
14	MR. MONIZ: Okay.	10:52:09
15	BY MR. MONIZ:	10:52:13
16	Q So, Ms. Goldbronn, this is an article	10:52:14
17	from the August 2016 time frame. And I'm just	10:52:15
18	going to read a quick selection from it here:	10:52:19
19	"The hospital's CEO Paul Viviano	10:52:23
20	also thanked Heard in a statement.	10:52:27
21	'Her generosity will support the	10:52:29
22	lifesaving treatments and cures	10:52:32
23	that Children's Hospital	10:52:35
24	Los Angeles provides for critically	10:52:38
25	ill children each year,' he said."	10:52:41

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1 Have I accurately read what that document 10:52:43
2 states? 10:52:46
3 MS. BREDEHOFT: Objection. Authenticity. 10:52:47
4 Hearsay. Foundation. Improper reference to an 10:52:47
5 article that this witness did not author. And it 10:52:51
6 is outside the scope of the four topics. 10:52:55
7 MR. BLESSEY: You can respond. 10:52:59
8 THE WITNESS: Yes. 10:53:02
9 BY MR. MONIZ: 10:53:02
10 Q Okay. So this article would appear to 10:53:03
11 reflect that a public statement was made by an 10:53:04
12 individual named Paul Viviano. 10:53:10
13 Do you know who Paul Viviano is? 10:53:13
14 MS. BREDEHOFT: Objection to the first 10:53:16
15 half of that question. Again, it's testimony. And 10:53:17
16 it's leading. Hearsay. Foundation. And 10:53:21
17 authenticity. 10:53:24
18 I don't have an objection to the second 10:53:29
19 half. 10:53:31
20 THE WITNESS: Yes. I know who Paul 10:53:31
21 Viviano is. 10:53:33
22 BY MR. MONIZ: 10:53:34
23 Q And who is Paul Viviano? 10:53:34
24 A He's the CEO of Children's Hospital 10:53:40
25 Los Angeles. 10:53:41

1 Q Okay. Was he the CEO of the Children's 10:53:46
2 Hospital in 2016? 10:53:50
3 MS. BREDEHOFT: Objection. Foundation. 10:53:52
4 BY MR. MONIZ: 10:53:54
5 Q If you know. 10:53:54
6 A Yes. 10:53:55
7 Q And is he still the CEO? 10:53:55
8 A Yes. 10:53:58
9 Q I think you testified previously that you 10:54:04
10 are involved in donor relations. 10:54:06
11 Is it common for the hospital's CEO to 10:54:08
12 make a public statement praising a particular 10:54:12
13 donor? 10:54:15
14 MS. BREDEHOFT: Objection. Leading. 10:54:15
15 Hearsay. Foundation. Authenticity. Calls for 10:54:17
16 speculation. And outside the scope. 10:54:21
17 MR. BLESSEY: I would join on the lack of 10:54:24
18 foundation. I'm sure it depends. 10:54:25
19 But go ahead, if you understand what he's 10:54:28
20 asking. 10:54:31
21 THE WITNESS: Yeah. If you can clarify. 10:54:32
22 BY MR. MONIZ: 10:54:34
23 Q Sure. In the -- in the years that you've 10:54:35
24 been working at the Children's Hospital, can you 10:54:42
25 recall any occasions when you were made aware that 10:54:45

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1	Mr. Viviano had made a public statement recognizing	10:54:49
2	a donor for a particular donation?	10:54:53
3	MS. BREDEHOFT: Objection. Hearsay.	10:54:56
4	Foundation. And leading. Calls for speculation.	10:54:57
5	MR. BLESSEY: I would add relevance to	10:55:01
6	that list of objections.	10:55:04
7	But, again, if you understand what he's	10:55:07
8	asking, go ahead and tell him.	10:55:09
9	THE WITNESS: Our CEO has thanked donors	10:55:14
10	publicly since the time I've been here in 2018.	10:55:17
11	MR. MONIZ: I'm just going to briefly	10:55:29
12	note. Mr. Blessey, I don't know whether anyone	10:55:31
13	else is having this problem. I'm having a little	10:55:33
14	bit of a hard time hearing you.	10:55:37
15	MR. BLESSEY: Okay.	10:55:40
16	MR. MONIZ: So I don't know whether you	10:55:40
17	want to adjust your microphone, but I want to make	10:55:41
18	sure that whatever -- whatever comments you're	10:55:44
19	making are captured.	10:55:44
20	MR. BLESSEY: Okay. Did you hear -- I'm	10:55:45
21	sorry, Counsel, to interrupt you. I really am.	10:55:46
22	Did you hear my objection on relevance --	10:55:51
23	MR. MONIZ: Yes.	10:55:55
24	MR. BLESSEY: -- to your last question?	10:55:55
25	Okay.	10:55:55

1	MR. MONIZ: I heard it.	10:55:55
2	MR. BLESSEY: I will endeavor to keep my	10:55:56
3	voice up. The microphone, believe it or not, is in	10:55:59
4	the ceiling, so I've got to make sure I direct my	10:56:03
5	voice and my comments to the ceiling, believe it or	10:56:06
6	not.	10:56:08
7	Go ahead.	10:56:09
8	MR. MONIZ: All right.	10:56:11
9	BY MR. MONIZ:	10:56:11
10	Q So I think your response was that the CEO	10:56:12
11	has thanked donors, while you've been working	10:56:15
12	there, publicly?	10:56:19
13	MS. BREDEHOFT: Objection. Leading. And	10:56:20
14	hearsay. Foundation.	10:56:21
15	BY MR. MONIZ:	10:56:23
16	Q I just want to make sure that I've --	10:56:24
17	that I understood your response and I'm recalling	10:56:24
18	it correctly.	10:56:27
19	Is that accurate?	10:56:28
20	A That is correct.	10:56:29
21	Q Okay. Do you recall how many times	10:56:29
22	that's happened?	10:56:31
23	MS. BREDEHOFT: Objection. Foundation.	10:56:36
24	Hearsay.	10:56:38
25	MR. BLESSEY: It assumes facts that she	10:56:40

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1 kept track. 10:56:41
2 But if you can answer, go ahead. 10:56:42
3 THE WITNESS: I don't keep track, so I 10:56:44
4 wouldn't be able to tell you off the top of my 10:56:46
5 head. 10:56:49
6 BY MR. MONIZ: 10:56:51
7 Q Sure. Can you give me any kind of an 10:56:52
8 estimate? 10:56:54
9 I mean, have you -- have you -- so let's 10:56:55
10 say this: Would you say that you have -- you have 10:56:58
11 observed him making public statements recognizing 10:57:03
12 donors 100 times, or more or less than 100 times? 10:57:07
13 Can you give me any kind of just 10:57:11
14 estimate? Understanding that that's all it is, is 10:57:13
15 an estimate. 10:57:16
16 MS. BREDEHOFT: Objection. Leading. 10:57:17
17 Hearsay. Foundation. And calls for speculation. 10:57:18
18 Now you are asking her to guess. 10:57:23
19 THE WITNESS: I would have to guess, and 10:57:25
20 I'm not with him all the time, so that's not fair. 10:57:26
21 BY MR. MONIZ: 10:57:33
22 Q Okay. So you're not able to give an 10:57:33
23 estimate of how many times you've personally been 10:57:35
24 aware of those kinds of comments? 10:57:37
25 MS. BREDEHOFT: Objection. Leading. 10:57:41

1	THE WITNESS: Correct.	10:57:43
2	MR. MONIZ: Can I see Depp 5 on the	10:58:02
3	screen, please, Alex.	10:58:05
4	MS. BREDEHOFT: Before you leave this	10:58:12
5	one, what did you label it?	10:58:13
6	Is it Deposition Exhibit Number 4 or 3,	10:58:14
7	this one?	10:58:17
8	MR. MONIZ: Excellent point, Elaine.	10:58:24
9	Thank you.	10:58:27
10	Can we mark this as deposition Exhibit 4,	10:58:27
11	please.	10:58:31
12	And just to make sure that I haven't	10:58:32
13	overlooked anything, did we get the deposition	10:58:34
14	notice marked as Exhibit 1. And the -- that	10:58:37
15	article that Ms. Bredehoft objected to the first	10:58:42
16	time marked as Exhibit 2.	10:58:48
17	THE STENOGRAPHER: Yes.	10:58:50
18	MR. MONIZ: Thank you.	10:58:52
19	All right. So what we have here, then,	10:58:57
20	is marked as exhibit -- let's mark this as	10:58:58
21	Exhibit 5.	10:59:01
22	(Deposition Exhibit 5 was marked for	10:58:07
23	identification.)	10:58:07
24	BY MR. MONIZ:	10:59:02
25	Q And, Ms. Goldbronn, do you recognize this	10:59:08

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1	document that we're marking as Exhibit 5?	10:59:10
2	A Yes.	10:59:13
3	Q Okay. And how do you recognize this?	10:59:15
4	A I recognize it as a copy of a check to	10:59:23
5	Children's Hospital Los Angeles that was in -- in	10:59:27
6	the Amber Heard file.	10:59:39
7	Q Okay. And does this -- does this check	10:59:41
8	reflect that --	10:59:43
9	MR. MONIZ: Actually, can you scroll --	10:59:46
10	no, I guess this is okay.	10:59:47
11	BY MR. MONIZ:	10:59:49
12	Q Does this check reflect that, on	10:59:50
13	August 24th, 2016, the Children's Hospital received	10:59:52
14	a check for \$100,000?	10:59:55
15	MS. BREDEHOFT: Objection --	10:59:58
16	THE WITNESS: Correct.	10:59:59
17	MS. BREDEHOFT: -- to the form of that	10:59:59
18	question. Foundation. Hearsay. It calls for	11:00:01
19	speculation.	11:00:04
20	But go ahead.	11:00:05
21	BY MR. MONIZ:	11:00:07
22	Q Was this document produced as part of the	11:00:07
23	Children's Hospital document production?	11:00:09
24	A Yes, it was.	11:00:13
25	Q Were you personally involved in locating	11:00:14

Transcript of Candie Davidson-Goldbronn, Designated Representative
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1	this check?	11:00:16
2	A Yes, I was.	11:00:17
3	Q Okay. Are copies of checks like this	11:00:18
4	commonly maintained by the Children's Hospital as	11:00:23
5	part of its normal pattern of records keeping?	11:00:26
6	MS. BREDEHOFT: I wasn't objecting to the	11:00:27
7	foundation.	11:00:29
8	You said was it received on 8/24/2016.	11:00:30
9	How does she know whether it was received on	11:00:35
10	August 24?	11:00:37
11	I'm not going to object to the	11:00:38
12	admissibility of this document.	11:00:39
13	MR. MONIZ: That's fine. We can move on.	11:00:42
14	We can move on.	11:00:51
15	I think -- let's go to Exhibit 6, Alex.	11:00:52
16	MS. BREDEHOFT: And, again, I have the	11:01:09
17	same objection. This document was produced	11:01:10
18	45 minutes before this deposition began, and it has	11:01:12
19	nothing to do with the topic areas. It wasn't	11:01:15
20	written by this witness or anyone at Children's	11:01:18
21	Hospital, to our knowledge.	11:01:20
22	It lacks authenticity, hearsay, and	11:01:22
23	foundation, and is improperly used in this	11:01:26
24	deposition, and should not be used in this	11:01:30
25	deposition given the lateness of the production as	11:01:32

Transcript of Candie Davidson-Goldbronn, Designated Representative
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1	well.	11:01:37
2	MR. MONIZ: Elaine, we can just make that	11:01:39
3	a standing objection, if you'd like.	11:01:41
4	MS. BREDEHOFT: A blanket objection to	11:01:45
5	each of those that you produced?	11:01:46
6	All right. Then, I'll just identify them	11:01:47
7	as we go. Okay.	11:01:47
8	MR. MONIZ: And I'm just going to note	11:01:49
9	again for the record, this document was obtained	11:01:51
10	from publicly available sources in the last day or	11:01:53
11	so. This record was not required to be produced --	11:01:55
12	certainly not required to be produced prior to our	11:01:58
13	having obtained it.	11:02:01
14	Ms. Heard is perfectly capable of having	11:02:02
15	obtained it for herself. Ms. Heard has been aware	11:02:06
16	of this as an issue for many months. And to say	11:02:06
17	nothing of the fact that Ms. Heard has not asked	11:02:11
18	for these documents.	11:02:13
19	I would ask Ms. Bredehoff to cite me any	11:02:15
20	kind of document request that specifically relates	11:02:20
21	to Ms. Heard's donations or articles relating to	11:02:22
22	the same. I don't believe you've asked for that,	11:02:25
23	Elaine, and there's really no requirement that we	11:02:27
24	produce it.	11:02:32
25	Nonetheless, we can continue.	11:02:33

1	Alex, could you please scroll down a	11:02:35
2	little bit. Second page, probably.	11:02:39
3	And before I forget, let's mark this as	11:02:46
4	Exhibit 6.	11:02:49
5	(Deposition Exhibit 6 was marked for	11:00:56
6	identification.)	11:00:56
7	BY MR. MONIZ:	11:02:50
8	Q All right. I'm going to do the same	11:02:51
9	thing, which will, no doubt, prompt another	11:02:52
10	objection from Ms. Bredehoft, but I'm going to	11:02:56
11	briefly read from this -- read from this document:	11:02:58
12	"A week after reaching a divorce	11:03:02
13	settlement with Johnny Depp -- and	11:03:05
14	subsequently announcing that she	11:03:07
15	was donating the entirety of said	11:03:08
16	divorce settlement to charity --	11:03:11
17	Amber Heard is taking issue with	11:03:13
18	the way in which the settlement is	11:03:15
19	being handled.	11:03:18
20	"On Thursday, her legal counsel	11:03:19
21	complained to TMZ that Depp plans	11:03:21
22	to donate the \$7 million settlement	11:03:24
23	directly to the two charities of	11:03:27
24	her choice -- the Children's	11:03:29
25	Hospital of Los Angeles and the	11:03:31

Transcript of Candie Davidson-Goldbrom, Designated Representative
March 30, 2021

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1 American Civil Liberties Union, 11:03:32
2 which she specified in a press 11:03:34
3 release that circulated last week. 11:03:36
4 Rather than give the payment to 11:03:39
5 Heard to donate, though, Heard's 11:03:41
6 team argues that, in paying the 11:03:44
7 charities directly, Depp will 11:03:48
8 benefit from a hefty tax deduction 11:03:53
9 that will mean he is actually 11:03:55
10 paying less than what was agreed 11:03:57
11 on. 11:03:59
12 "'If Johnny wishes to change the 11:04:00
13 settlement agreement, we must 11:04:05
14 insist that he honor the full 11:04:06
15 amount by donating \$14 million to 11:04:09
16 charity, which after accounting for 11:04:13
17 his tax deduction, is equal to his 11:04:14
18 \$7 million payment obligation to 11:04:18
19 Amber,' Heard's team told TMZ. 'We 11:04:20
20 would also insist that the whole 11:04:25
21 amount be paid immediately and not 11:04:25
22 drawn out over many years.'" 11:04:25
23 And I think that's enough. 11:04:26
24 MR. MONIZ: If you scroll up -- well, 11:04:26
25 actually, we can see, in the top left-hand corner 11:04:27

1	there, the date of this article is -- well,	11:04:27
2	actually, that's today's day.	11:04:28
3	Can we scroll up to the top of the	11:04:29
4	article.	11:04:29
5	BY MR. MONIZ:	11:04:29
6	Q Okay. Do you see -- do you see a date	11:04:31
7	there? It says "August 25th, 2016."	11:04:33
8	MS. BREDEHOFT: Objection. Before you go	11:04:37
9	there, improper use of this article. Improper	11:04:37
10	reading of this. Improper question. Authenticity.	11:04:41
11	Foundation. Hearsay. And now leading. And not	11:04:43
12	best evidence. And outside the scope of this	11:04:47
13	witness's testimony.	11:04:49
14	BY MR. MONIZ:	11:04:52
15	Q So, Ms. Goldbronn, first of all, do I	11:04:53
16	appear to have accurately read what that document	11:04:56
17	states?	11:05:00
18	MS. BREDEHOFT: Objection. Leading.	11:05:00
19	And, again, authenticity. Foundation.	11:05:01
20	Hearsay. This is -- and outside the scope.	11:05:04
21	THE WITNESS: Yes.	11:05:12
22	BY MR. MONIZ:	11:05:12
23	Q Okay. What is the Children's Hospital	11:05:14
24	aware, in the time frame that we're talking about	11:05:16
25	here, which is August 25th, 2016 -- well, strike	11:05:20

Transcript of Candie Davidson-Goldbronn, Designated Representative
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1	that.	11:05:25
2	Were there any communications between the	11:05:26
3	Children's Hospital and Ms. Heard regarding the	11:05:28
4	fact -- regarding any objections that Ms. Heard may	11:05:31
5	have made to Mr. Depp's paying the Children's	11:05:35
6	Hospital the settlement amount directly?	11:05:39
7	MS. BREDEHOFT: Objection. Leading.	11:05:42
8	Foundation. Hearsay. Calls for speculation.	11:05:43
9	Go ahead.	11:05:47
10	MR. BLESSEY: I would join on the lacks	11:05:49
11	foundation.	11:05:50
12	Go ahead.	11:05:51
13	THE WITNESS: Could you clarify your	11:05:52
14	question, please.	11:05:53
15	BY MR. MONIZ:	11:05:56
16	Q To your knowledge, were there any	11:05:57
17	communications between the Children's Hospital, on	11:05:58
18	the one hand, and Ms. Heard or her representatives,	11:06:02
19	on the other hand, regarding Ms. Heard's objections	11:06:04
20	to Mr. Depp's making direct payments to the	11:06:10
21	Children's Hospital instead of paying Ms. Heard?	11:06:13
22	MS. BREDEHOFT: Objection. Again,	11:06:18
23	leading. Foundation. Hearsay. Calls for hearsay.	11:06:19
24	And speculation.	11:06:22
25	Go ahead.	11:06:24

Transcript of Candie Davidson-Goldbronn, Designated Representative
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1 THE WITNESS: I'm unaware. 11:06:25

2 BY MR. MONIZ: 11:06:26

3 Q Okay. To your knowledge, was the 11:06:27

4 Children's Hospital aware that Ms. Heard had 11:06:28

5 publicly objected to Mr. Depp's paying the 11:06:31

6 Children's Hospital directly instead of giving the 11:06:37

7 money to Ms. Heard? 11:06:41

8 MS. BREDEHOFT: Objection. Leading. 11:06:42

9 Foundation. Hearsay. Speculation. And definitely 11:06:43

10 outside the scope of the topics. 11:06:46

11 THE WITNESS: I'm unaware. 11:06:55

12 BY MR. MONIZ: 11:06:56

O,R, 13 Q Are you aware of any communications with 11:06:56

F/A, 14 Ms. Heard on the one hand and the Children's 11:06:58

PK 15 Hospital on the other hand regarding any public 11:07:00

16 contention Ms. Heard had made that the donations 11:07:04

17 should be made immediately and not drawn out over 11:07:08

18 many years? 11:07:12

19 MS. BREDEHOFT: Objection. Leading. 11:07:13

20 Foundation. Hearsay. Speculation. And outside 11:07:13

21 the scope. 11:07:15

22 Go ahead. 11:07:16

O,R, 22 11:07:16

F/A, 23 THE WITNESS: I'm unaware. 11:07:17

PK 24 11:07:19

24 BY MR. MONIZ: 11:07:19

O,R, 25 Q Are you aware of any communications in 11:07:19

F/A, 25 11:07:19

PK 25 11:07:19

Transcript of Candie Davidson-Goldbronn, Designated Representative
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O, F/A, PK	1	this time frame with Ms. Heard regarding the timing	11:07:21
	2	of her donations to the Children's Hospital?	11:07:24
	3	MS. BREDEHOFT: Objection. Hearsay. And	11:07:28
	4	foundation.	11:07:31
	5	Go ahead.	11:07:33
O, F/A, PK	6	THE WITNESS: I'm unaware.	11:07:33
	7	BY MR. MONIZ:	11:07:36
	8	Q So to your knowledge, while Ms. Heard may	11:07:37
	9	have released public statements, did she have any	11:07:43
	10	communications directly with the Children's	11:07:46
	11	Hospital directly on these topics?	11:07:46
	12	MS. BREDEHOFT: Objection. Leading.	11:07:49
	13	Foundation. And hearsay.	11:07:50
	14	Go ahead.	11:07:52
	15	THE WITNESS: I'm unaware.	11:07:53
	16	BY MR. MONIZ:	11:08:03
	17	Q Do you have any opinion on who at the	11:08:04
	18	Children's Hospital would have been involved in	11:08:05
	19	those communications, if such communications had	11:08:07
	20	taken place?	11:08:09
	21	MR. BLESSEY: The problem with the	11:08:13
	22	question is it assumes facts and lacks foundation.	11:08:14
	23	MS. BREDEHOFT: Right. And calls for	11:08:19
	24	speculation as well. Foundation. And hearsay.	11:08:20
	25	THE WITNESS: I would have to speculate,	11:08:24

1 and that would be unfair to anyone. 11:08:26

2 BY MR. MONIZ: 11:08:30

3 Q But sitting here today as the Children's 11:08:31

4 Hospital's person most qualified with respect to, 11:08:32

5 among other things, communications between the 11:08:36

6 Children's Hospital and Ms. Heard regarding these 11:08:39

7 donations, you are unaware of any communications, 11:08:42

8 in the time frame of 2016, August, regarding the 11:08:45

9 timing of these payments, the amounts of these 11:08:47

10 payments, anything -- you're unaware of any direct 11:08:50

11 communications. 11:08:54

12 Am I accurately describing your 11:08:55

13 testimony? 11:08:57

14 I just want to make sure I'm following -- 11:08:57

15 A Correct. 11:09:00

16 Q Okay. In the course of -- well, let me 11:09:01

17 ask you this: In this time frame, August 2016, did 11:09:15

O, F/A, 18 the Children's Hospital have any opinion, or any 11:09:19
PK

19 expectation, that you are aware of, of when 11:09:24

20 Ms. Heard's donations would be made? 11:09:29

21 MS. BREDEHOFT: Objection. Leading. 11:09:33

22 Hearsay. Foundation. Calls for speculation. And 11:09:34

23 it's outside the scope. 11:09:38

O, F/A, 24 THE WITNESS: I'm unaware. 11:09:44
PK

25 MR. MONIZ: Alex, can I please see 11:09:57

Transcript of Candie Davidson-Goldbronn, Designated Representative
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1	Depp 7.	11:10:01
2	Actually, before I move on, I don't even	11:10:03
3	recall. Have I -- have we marked this? Let's mark	11:10:07
4	this as Exhibit 6, if we haven't.	11:10:09
5	THE STENOGRAPHER: We have.	11:10:12
6	MR. MONIZ: Perfect.	11:10:14
7	Can we go to Depp 7.	11:10:15
8	(Deposition Exhibit 7 was marked for	11:10:18
9	identification.)	11:10:18
10	MS. BREDEHOFT: And this is the same --	11:10:22
11	this is one of the documents that was produced	11:10:23
12	45 minutes before the deposition. And since you've	11:10:26
13	said you'll give me a blanket objection, I'm just	11:10:27
14	going to ask that we repeat the same objections I	11:10:31
15	had to the other articles that were provided also	11:10:34
16	45 minutes in advance, including the objections --	11:10:39
17	the specific objections.	11:10:41
18	MR. MONIZ: I'm going to note the -- I'm	11:10:43
19	going to note the same response, Elaine, that these	11:10:44
20	documents were publicly available, they were	11:10:46
21	obtained --	11:10:48
22	MS. BREDEHOFT: Sam, if you're going to	11:10:49
23	put that on the record, then let me -- I mean, are	11:10:51
24	we doing a blanket, or are we not doing a blanket?	11:10:53
25	MR. MONIZ: Well, Elaine -- that's fine.	11:10:58

1	MS. BREDEHOFT: Do you want me to	11:11:00
2	repeat --	11:11:00
3	MR. MONIZ: I mean, you stated -- you	11:11:00
4	stated your objection. You stated your objection.	11:11:00
5	I'm noting -- I'm noting my response. But we can	11:11:01
6	move on.	11:11:04
7	All right. Can we scroll down just a	11:11:10
8	little bit and --	11:11:13
9	All right. So, actually -- I'm sorry.	11:11:24
10	Can you -- can you scroll up again, Alex. I	11:11:26
11	apologize. A little bit farther.	11:11:30
12	BY MR. MONIZ:	11:11:34
13	Q All right. So, Ms. Goldbronn, this is	11:11:34
14	a -- this is a document -- this is an article dated	11:11:38
15	November 29th, 2016, from the Independent.	11:11:42
16	MR. MONIZ: And can you scroll down	11:11:49
17	again, Alex.	11:11:51
18	BY MR. MONIZ:	11:11:52
19	Q Okay. I'm just going to -- I'm just	11:11:57
20	going to read from this briefly again as well:	11:11:57
21	"Amber Heard has said the	11:12:01
22	\$7 million divorce settlement from	11:12:04
23	Johnny Depp, which she pledged to	11:12:07
24	donate to charity, will be paid as	11:12:11
25	soon as her divorce is finalised	11:12:13

Transcript of Candie Davidson-Goldbronn, Designated Representative
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1 after a report questioned why 11:12:16
2 charities had not received the 11:12:18
3 funds." 11:12:19
4 MR. MONIZ: Alex, can you scroll down a 11:12:20
5 little bit more. 11:12:22
6 BY MR. MONIZ: 11:12:22
7 Q Again, I'm going to quote, then, from the 11:12:22
8 bottom paragraph here: 11:12:24
9 "On Monday, TMZ ran a report under 11:12:25
10 the headline, 'Amber Heard 11:12:28
11 Children's Hospital Money MIA.' It 11:12:31
12 claimed neither the Children's 11:12:34
13 Hospital or ACLU had received any 11:12:35
14 further funds since Depp paid an 11:12:38
15 initial installment of \$100,000 to 11:12:41
16 each charity in August." 11:12:45
17 BY MR. MONIZ: 11:12:47
18 Q So have I correctly read what the 11:12:47
19 document states? 11:12:48
20 MS. BREDEHOFT: Objection. Leading. 11:12:49
21 It's improper use of an article. Authenticity. 11:12:50
22 Foundation. And hearsay. 11:12:52
23 It's reading as if this witness would 11:12:55
24 have written this or have any of this independent 11:12:56
25 knowledge. It's an improper use of the document. 11:12:56

1 And it's also outside the scope of the 11:12:59
2 four categories. 11:13:02

3 THE WITNESS: Yes. 11:13:09

4 BY MR. MONIZ: 11:13:11

5 Q Okay. In this time frame now -- and 11:13:11

O, F/A
PK

6 we're talking about November 2016 -- are you aware 11:13:20

7 of the Children's Hospital having any 11:13:22

8 communications with Ms. Heard about the timing of 11:13:26

9 her donations? 11:13:28

10 A I'm unaware. 11:13:31

11 Q Do you know how TMZ would have obtained 11:13:33

12 information that the only funds received at that 11:13:36

13 point was the initial \$100,000? 11:13:40

14 MS. BREDEHOFT: Objection. Leading. 11:13:44

15 Foundation. Calls for hearsay. Assumes facts not 11:13:46

16 in evidence. And is outside the scope. 11:13:51

17 THE WITNESS: I'm unsure. 11:13:56

18 BY MR. MONIZ: 11:14:03

19 Q You're unsure, meaning you have no idea? 11:14:04

20 Or you have some idea, but you're not sure? 11:14:05

21 A I have no idea how they heard. 11:14:09

22 Q Is this article accurate? 11:14:12

23 In other words, as of -- well, is this 11:14:14

24 article accurate in this sense, in that, as of 11:14:16

25 November 26th, 2016, the only money received from 11:14:19

Transcript of Candie Davidson-Goldbronn, Designated Representative
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1	Ms. Heard by the Children's Hospital was the	11:14:24
2	initial \$100,000 payment made by Mr. Depp in	11:14:28
3	August?	11:14:33
4	MS. BREDEHOFT: Objection. Leading.	11:14:33
5	Foundation. Authenticity. And hearsay. Calls for	11:14:35
6	speculation.	11:14:37
7	THE WITNESS: At that time, we had not	11:14:41
8	heard from Ms. Heard.	11:14:44
9	BY MR. MONIZ:	11:14:47
10	Q So you changed my question a little bit	11:14:48
11	there.	11:14:50
12	The question was: At this time, had any	11:14:51
13	money been received by the Children's Hospital from	11:14:53
14	Ms. Heard, other than the \$100,000 originally paid	11:14:56
15	by Mr. White on behalf of Mr. Depp in August of	11:14:59
16	2016?	11:15:03
17	MS. BREDEHOFT: Objection. Leading.	11:15:04
18	Foundation. And hearsay.	11:15:06
19	THE WITNESS: Could you repeat the	11:15:13
20	question one more time?	11:15:14
21	BY MR. MONIZ:	11:15:15
22	Q Sure.	11:15:16
23	As of November 2016, what money had been	11:15:16
24	received from [sic] the Children's Hospital in	11:15:21
25	connection with Ms. Heard's \$3.5 million pledge?	11:15:26

Transcript of Candie Davidson-Goldbronn, Designated Representative
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1 MS. BREDEHOFT: Objection -- 11:15:34
2 (Reporter clarification.) 11:15:37
3 BY MR. MONIZ: 11:15:38
4 Q Let me try that again. 11:15:39
5 As of November 2016, what money had been 11:15:39
6 received by the Children's Hospital in connection 11:15:43
7 with Ms. Heard's \$3.5 million pledge? 11:15:46
8 MS. BREDEHOFT: Objection. It's -- first 11:15:55
9 of all, foundation. And hearsay. And it -- and to 11:15:56
10 the form of the question itself. Calls for 11:15:59
11 speculation. 11:16:01
12 THE WITNESS: We had received a \$100,000 11:16:09
13 check. 11:16:11
14 BY MR. MONIZ: 11:16:14
15 Q Is that the check we looked at earlier 11:16:15
16 today? 11:16:17
17 A Correct. 11:16:18
18 Q Other than that check, had anything else 11:16:19
19 been received? 11:16:21
20 MS. BREDEHOFT: Objection. Leading. 11:16:23
21 THE WITNESS: No. 11:16:25
22 MS. BREDEHOFT: Foundation. 11:16:27
23 Go ahead. 11:16:28
24 THE WITNESS: No. 11:16:30
25

Transcript of Candie Davidson-Goldbronn, Designated Representative
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1	BY MR. MONIZ:	11:16:30
2	Q Okay. Are you aware of any	11:16:31
3	communications between the Children's Hospital and	11:16:34
4	Ms. Heard asking when the rest of the money would	11:16:37
5	be provided?	11:16:39
6	A In general?	11:16:42
7	Q In this time frame --	11:16:45
8	MR. BLESSEY: The question is vague --	11:16:46
9	I'm sorry, Counsel, I didn't mean to step	11:16:48
10	on your lines.	11:16:54
11	It's vague as to time.	11:16:54
12	Go ahead.	11:16:54
13	MR. MONIZ: Sure. Let me try to address	11:16:55
14	that.	11:16:55
15	BY MR. MONIZ:	11:16:55
16	Q I'm speaking now in the time frame of	11:16:56
17	this article, so November of 2016.	11:16:57
18	Are you aware if the Children's Hospital	11:17:00
19	had reached out at all to Ms. Heard to inquire when	11:17:02
20	the remaining payments would be made?	11:17:05
21	A I'm unaware.	11:17:07
22	Q Are you aware of any communications	11:17:11
23	between Ms. Heard and the Children's Hospital in	11:17:13
24	this time frame?	11:17:15
25	A I'm unaware.	11:17:18

1	MR. MONIZ: All right. Let's go to	11:17:37
2	exhibit -- let's go to Depp 8.	11:17:39
R,H 3	And before I forget, let's mark this as	11:18:06
4	Exhibit 8.	11:18:10
5	(Deposition Exhibit 8 was marked for	11:17:44
6	identification.)	11:17:44
7	BY MR. MONIZ:	11:18:11
8	Q So, Ms. Goldbronn, do you recognize this	11:18:12
9	document?	11:18:14
10	A I do.	11:18:15
11	Q And what is it?	11:18:16
12	A It's the Children's Hospital Los Angeles	11:18:20
13	Honor Roll for fiscal year 2017.	11:18:22
14	Q And what is the Honor Roll?	11:18:32
15	A It acknowledges those donations that have	11:18:36
16	been given to Children's Hospital Los Angeles	11:18:46
17	within a particular fiscal year; for this fiscal	11:18:48
18	year that we're showing, in 2017.	11:18:50
19	Q Is this -- is an Honor Roll released by	11:18:51
20	the Children's Hospital every year?	11:18:55
21	A It is done annually.	11:18:59
22	Q Okay. Is the Honor Roll publicly	11:19:00
23	available?	11:19:04
24	A Yes.	11:19:05
25	Q Is it accessible to the public and the	11:19:08

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R, H	1	media?	11:19:11
	2	MS. BREDEHOFT: Objection. Leading.	11:19:12
	3	Calls for speculation. And hearsay. Foundation.	11:19:13
	4	THE WITNESS: Yes.	11:19:21
	5	BY MR. MONIZ:	11:19:21
	6	Q Okay. Where is it -- is it posted on the	11:19:22
	7	Children's Hospital website?	11:19:27
	8	MS. BREDEHOFT: Objection. Leading. And	11:19:28
	9	foundation. Go ahead.	11:19:30
	10	BY MR. MONIZ:	11:19:31
	11	Q Well, let me -- let me ask it this way:	11:19:32
	12	Do you know where it's published?	11:19:34
	13	A Yes.	11:19:39
	14	Q Where is it published?	11:19:39
	15	A It's published in our magazine,	11:19:41
	16	Children's Hospital Los Angeles magazine.	11:19:48
	17	Q Is it published anywhere else?	11:19:52
	18	A During that time, I'd have -- I don't	11:19:59
	19	know if they were publishing it on the website.	11:20:03
	20	Q Okay. Is this document maintained in the	11:20:16
	21	regular course of business by the Children's	11:20:18
	22	Hospital?	11:20:19
	23	MS. BREDEHOFT: Objection. Leading.	11:20:21
	24	THE WITNESS: Yes.	11:20:22
	25		

1 BY MR. MONIZ: 11:20:23

2 Q Was this document produced as part of 11:20:24

3 your document production? 11:20:25

4 A Yes. 11:20:29

5 Q Did you personally identify this document 11:20:30

6 for this document production? 11:20:32

7 A Yes. 11:20:36

8 MS. BREDEHOFT: Objection to the form of 11:20:38

9 the question. Unclear. 11:20:41

10 But go ahead. 11:20:43

11 MR. MONIZ: Okay. 11:20:51

12 Can you scroll down, please, Alex. A 11:20:51

13 little bit further. A little bit further. Sorry. 11:20:59

14 There we go. Okay. 11:21:09

15 BY MR. MONIZ: 11:21:15

R 16 Q So, Ms. Goldbronn, do you see here, at 11:21:17

17 the bottom, third column from the left, at the very 11:21:18

18 bottom, do you see the name "Ms. Amber Heard"? 11:21:21

19 A I do. 11:21:26

20 Q Okay. Can you tell me what the inclusion 11:21:27

21 of that name on that document means there? 11:21:30

22 A That a gift to Children's Hospital 11:21:36

23 Los Angeles was made. And the amount would be in 11:21:39

24 between \$1 million and \$4,999,999. 11:21:47

25 Q And when would this have been published, 11:21:57

1	this document?	11:22:00
2	A 2018.	11:22:07
R 3	MR. MONIZ: Actually, can we scroll --	11:22:09
4	can we scroll up a little bit there, Alex. I want	11:22:10
5	to just make sure I'm following along here.	11:22:14
6	Can you scroll up, actually, to the top	11:22:17
7	of the document. So -- hang on. Hang on. Hang	11:22:19
8	on.	11:22:21
9	THE WITNESS: 2017.	11:22:23
10	BY MR. MONIZ:	11:22:23
11	Q I was going to say, this states for the	11:22:24
12	time period of July 1st, 2016, through June 30,	11:22:27
13	2017.	11:22:32
14	So with that in mind, are you able to --	11:22:33
15	do you want to revise when this would have been	11:22:36
16	published?	11:22:40
17	A Yes. My apologies. It would have been	11:22:41
18	published in 2017.	11:22:44
19	Q Okay. So prior to June 30th, 2017, had	11:22:46
20	Ms. Heard made any payments to the Children's	11:22:59
21	Hospital, other than the original \$100,000 received	11:23:01
22	back in August of 2016?	11:23:05
23	MS. BREDEHOFT: Objection. Leading. And	11:23:08
24	foundation.	11:23:09
25	Go ahead.	11:23:10

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R	1	THE WITNESS: No.	11:23:14
	2	BY MR. MONIZ:	11:23:20
	3	Q So -- okay. So as of June 30th, 2017 --	11:23:22
	4	maybe I'm just re-asking the exact same question,	11:23:30
	5	but I just want to make sure that we -- that I have	11:23:32
	6	your answer correct.	11:23:34
	7	As of June 30th, 2017, had the Children's	11:23:36
	8	Hospital received any money from Ms. Heard, other	11:23:39
	9	than that original 100,000?	11:23:43
	10	MS. BREDEHOFT: Objection. Leading.	11:23:48
	11	Foundation.	11:23:49
	12	Go ahead.	11:23:50
	13	THE WITNESS: No.	11:23:52
	14	BY MR. MONIZ:	11:23:55
	15	Q Okay. Had there been any communications,	11:23:56
	16	to your knowledge, in the time frame leading up	11:23:58
	17	to -- leading up to the publication of this Honor	11:24:04
	18	Roll, had -- well, strike all of that.	11:24:06
	19	Let me ask it this way: As of the date	11:24:10
	20	of this document being published, of this Honor	11:24:13
	21	Roll being published, had the Children's Hospital	11:24:22
	22	had any communications with Ms. Heard about her	11:24:26
	23	pledge to donate \$3.5 million?	11:24:29
	24	MS. BREDEHOFT: Objection. Leading.	11:24:30
	25	Foundation. And hearsay. Calls for speculation.	11:24:31

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1	Go ahead.	11:24:34
2	MR. BLESSEY: Counsel, I'm sorry.	11:24:35
3	Mr. Blessey. It's vague as to time.	11:24:37
4	Did you have a time frame in your	11:24:39
5	question?	11:24:40
6	MR. MONIZ: Yes. I think I built that	11:24:42
7	time frame in, but I'll ask it again to make sure	11:24:44
8	we have it clear.	11:24:46
9	BY MR. MONIZ:	11:24:47
10	Q As of the date of this document, which	11:24:48
11	appears to reflect the time period July 21st, 2016,	11:24:50
12	[sic] through June 30, 2017.	11:24:55
13	So I'm asking, as of June 30th, 2017, had	11:24:57
14	there been any communications between the	11:25:01
15	Children's Hospital, on the one hand, and Ms. Heard	11:25:03
16	or her representatives, on the other hand,	11:25:05
17	regarding Ms. Heard's pledge to donate \$3.5 million	11:25:07
18	to the Children's Hospital?	11:25:13
19	MS. BREDEHOFT: And objection.	11:25:16
20	Foundation. Hearsay. And calls for speculation.	11:25:16
21	Go ahead.	11:25:19
22	THE WITNESS: I'm not aware.	11:25:19
23	BY MR. MONIZ:	11:25:25
24	Q In preparation for this deposition today,	11:25:26
25	in which you have been designated as the person	11:25:27

1 most qualified to testify with respect to 11:25:30
2 communications between Children's Hospital and 11:25:33
3 Ms. Heard, did you inquire of anybody else whether 11:25:36
4 any such communications had taken place? 11:25:41

5 A I did. I inquired with Ellen Cheney and 11:25:43
6 Tiffanie Al-Nasser, both who've I -- I mentioned 11:25:49
7 earlier in this deposition. 11:25:52

8 Q Okay. And the response was "no"? 11:25:54

9 A Correct. The response was "no." 11:25:57

10 Q Okay. 11:25:59

11 MR. MONIZ: And can I see Depp -- well, 11:26:19
12 let's mark that -- let's mark that as Exhibit 8, if 11:26:20
13 we haven't already done so. 11:26:22

R 14 And then can I see Depp 9. 11:26:24

15 (Deposition Exhibit 9 was marked for 11:26:27
16 identification.) 11:26:27

17 BY MR. MONIZ: 11:26:56

18 Q All right. Do you recognize this 11:26:57
19 document? 11:26:58

20 A I do. 11:26:58

21 Q What is this document? 11:27:00

22 A It's a Children's Hospital Los Angeles 11:27:03
23 Honor Roll for Donors for their lifetime giving. 11:27:06

24 Q Okay. 11:27:11

25 MR. MONIZ: And then can we scroll down a 11:27:12

1 little bit. 11:27:14

R 2 Actually, I'm sorry, can we scroll back 11:27:28

3 up to the top. I apologize. 11:27:31

4 BY MR. MONIZ: 11:27:35

5 Q So this document was -- if you see -- if 11:27:36

6 you saw there, at the bottom right-hand corner, 11:27:37

7 that there's a Bates stamp of CHLA000082. 11:27:41

8 Do you see that? 11:27:46

9 A Correct. 11:27:47

10 Q And so is this document something that 11:27:48

11 was produced by the Children's Hospital? 11:27:51

12 A It is. 11:27:55

13 Q Is this basically the same as the -- as 11:27:57

14 the last document we were looking for; it's a 11:27:58

15 record of donors? 11:28:01

16 A Yes. 11:28:03

17 Q Okay. If you look at the top right-hand 11:28:04

18 corner here, there's a date. It says "as of 11:28:07

19 June 1, 2018." 11:28:11

20 Do you see where it says that, under the 11:28:12

21 box of "Lifetime Giving"? 11:28:14

22 A Yes. 11:28:17

23 Q Okay. Based on -- based on that, can you 11:28:19

24 tell me when this document would have been 11:28:26

25 published? 11:28:29

R 1 A In 2018. 11:28:32
2 Q And like the document that we were just 11:28:36
3 talking about, is this document publicly available? 11:28:38
4 A It is. 11:28:42
5 Q Would this document have been publicly 11:28:43
6 available in 2018? 11:28:46
7 MS. BREDEHOFT: Objection. Leading. 11:28:49
8 Foundation. Hearsay. 11:28:50
9 Go ahead. 11:28:53
10 THE WITNESS: Yes. 11:28:53
11 BY MR. MONIZ: 11:28:55
12 Q Where would this document have been 11:28:56
13 published? 11:28:57
14 MS. BREDEHOFT: Objection. Foundation. 11:28:59
15 And hearsay. 11:29:01
16 Go ahead. 11:29:02
17 BY MR. MONIZ: 11:29:04
18 Q Well, would this document -- 11:29:04
19 A In Children's -- go ahead. 11:29:06
20 Q I apologize. 11:29:07
21 Let me ask it this way: Would this 11:29:08
22 document have been published? 11:29:11
23 MS. BREDEHOFT: Objection. Leading. 11:29:14
24 Hearsay. Foundation. 11:29:16
25 THE WITNESS: Yes. 11:29:17

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1	BY MR. MONIZ:	11:29:17
2	Q And where?	11:29:18
3	MS. BREDEHOFT: Same objections.	11:29:19
4	THE WITNESS: The Children's Hospital	11:29:23
5	Los Angeles magazine.	11:29:25
6	BY MR. MONIZ:	11:29:27
7	Q And might this document also be available	11:29:29
8	online from the Children's Hospital's website?	11:29:32
9	MS. BREDEHOFT: Objection. Leading.	11:29:36
10	Hypothetical. Calls for speculation. Foundation.	11:29:37
11	And hearsay.	11:29:39
12	THE WITNESS: I would have to guess.	11:29:41
13	BY MR. MONIZ:	11:29:46
14	Q So you don't -- you don't know, based on	11:29:47
15	your own experience and knowledge as a vice	11:29:50
16	president of the Children's Hospital, whether, as a	11:29:52
17	matter of standard practice, these documents are	11:29:56
18	maintained on the website?	11:29:59
19	MS. BREDEHOFT: Objection. Leading.	11:30:00
20	Foundation. Hearsay. Speculation. And really	11:30:01
21	mischaracterizes her earlier testimony.	11:30:05
22	MR. MONIZ: No, I'm just trying to make	11:30:08
23	sure I -- I'm just trying to make sure I'm	11:30:10
24	following along and understand your response, so --	11:30:10
25	MS. BREDEHOFT: And outside the scope.	11:30:14

1 MR. BLESSEY: And I would add a tad bit 11:30:16
2 argumentative. 11:30:18
3 Go ahead. 11:30:19
4 THE WITNESS: Yes. Since this would have 11:30:21
5 been produced prior to my arrival at Children's 11:30:22
6 Hospital Los Angeles, I would have to guess if it 11:30:25
7 was produced online or not. 11:30:29
8 BY MR. MONIZ: 11:30:35
9 Q Okay. Do you know if documents like this 11:30:36
10 are online now? 11:30:38
11 MS. BREDEHOFT: Objection. Leading. 11:30:40
12 Foundation. Hearsay. And "documents like this." 11:30:41
13 MR. MONIZ: Well, that's -- that's fair. 11:30:45
14 MR. BLESSEY: Also relevance. 11:30:57
15 Go ahead. 11:30:58
16 MR. MONIZ: That's fair. 11:30:58
17 BY MR. MONIZ: 11:30:59
18 Q Do you know if -- 11:30:59
19 MR. BLESSEY: I'm sorry. Relevance. 11:30:59
20 Go ahead. 11:30:59
21 BY MR. MONIZ: 11:30:59
22 Q Do you know if the Honor Roll of Donors 11:30:59
23 is made publicly available on the Children's 11:31:02
24 Hospital's website now? 11:31:04
25 MS. BREDEHOFT: Objection. Leading. 11:31:06

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1 Hearsay. Foundation. And outside the scope. 11:31:07
2 THE WITNESS: We don't have it online 11:31:17
3 outside of the CHLA magazine. 11:31:19
4 BY MR. MONIZ: 11:31:25
5 Q When you say you "don't have it online 11:31:26
6 outside of the CHLA magazine," is the CHLA magazine 11:31:28
7 online? 11:31:34
8 MS. BREDEHOFT: Objection. Leading. 11:31:35
9 Foundation. Hearsay. 11:31:36
10 THE WITNESS: No. 11:31:38
11 MR. MONIZ: Okay. We'll come back to 11:31:45
12 that. 11:31:48
13 All right. Can you scroll down a little 11:31:53
14 bit, Alex. 11:31:55
15 Actually, how long have we been going? 11:32:00
16 THE STENOGRAPHER: Hour and a half. 11:32:06
17 MR. MONIZ: How is everybody doing? Do 11:32:07
18 you want to -- I want to defer to the witness, 11:32:08
19 here. I can keep going now, if you want. But if 11:32:11
20 you'd like a ten-minute break or something, just to 11:32:12
21 stretch your legs and get some water, I'm happy to 11:32:12
22 accommodate that. 11:32:17
23 THE WITNESS: No, I'm fine. 11:32:17
24 MR. BLESSEY: Since we're on this 11:32:19
25 topic -- yeah. Since we're on this topic, I'm not 11:32:19

1 going to hold you to it, but do you have an 11:32:21
2 estimate how much longer you think you might go? 11:32:24
3 MR. MONIZ: I don't think I'm going to go 11:32:28
4 all that much longer. It's -- you know, there's 11:32:30
5 not too much here. So no promises, but -- 11:32:33
6 MR. BLESSEY: I would agree. 11:32:38
7 MR. MONIZ: No promises, but I would 11:32:39
8 expect to be able to wrap up in the next -- well, 11:32:42
9 no promises, but not too much longer. 11:32:45
10 Of course, I can't speak for what -- I 11:32:49
11 can't speak for what Ms. Bredehoft may choose to 11:32:51
12 ask or not ask. 11:32:53
13 MR. BLESSEY: Yeah. I only bring it up 11:32:55
14 because you're talking about a break. And it 11:32:57
15 sounds like, although you were very careful about 11:32:59
16 committing to a time -- and I'm not expecting you 11:33:03
17 to commit to a time -- I was just trying to get 11:33:06
18 some rough estimate on how much longer you plan to 11:33:09
19 go with your portion of the deposition. 11:33:12
20 MR. MONIZ: I'm not anticipating -- I'm 11:33:13
21 not anticipating that this will be an all-day 11:33:15
22 deposition. Put it that way. 11:33:18
23 MR. BLESSEY: Okay. 11:33:20
24 MR. MONIZ: Unless Elaine asks a lot more 11:33:20
25 questions than I'm expecting. 11:33:20

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1 MR. BLESSEY: I guess we should also 11:33:21
2 defer to the court reporter and how she's doing and 11:33:24
3 whether or not she needs a break. 11:33:26
4 MR. MONIZ: Yeah, actually, if I can be 11:33:28
5 allowed to be selfish here, I could use a drink of 11:33:30
6 water. Can I have five minutes? 11:33:34
7 MR. BLESSEY: That's not selfish. Why 11:33:37
8 don't we do five minutes, and we'll wait for the 11:33:38
9 videographer to sign us off. 11:33:42
10 THE VIDEOGRAPHER: Going off the record. 11:33:46
11 The time is 11:33 Pacific. 11:33:48
12 (Recess taken from 11:33 a.m. to 11:33:52
13 11:41 a.m.) 11:41:12
14 THE VIDEOGRAPHER: We're going back on 11:41:17
15 the record. The time is 11:41 Pacific. 11:41:18
16 MR. MONIZ: Okay. Can we get back on the 11:41:26
17 screen, please -- I think it was -- are we on 11:41:28
18 Exhibit 9? 11:41:31
19 THE STENOGRAPHER: We are. 11:41:34
20 MR. MONIZ: Okay. 11:41:35
21 And can we please scroll down. And this 11:41:39
22 is -- just to pick back up where we are, this was 11:41:42
23 the June 2018 Honor Roll that we were just 11:41:46
24 discussing. 11:41:49
25 Can you please scroll down to the page 11:41:50

1 that's Bates-stamped CHLA000086. 11:41:52

2 Well, actually, maybe that's it here. 11:41:58

3 Hold on. We were just... 11:42:00

4 BY MR. MONIZ: 11:42:07

5 Q Okay. Do you see here, in the middle of 11:42:08

6 the -- in the central column, the name "Ms. Amber 11:42:09

7 Heard" appears again? 11:42:11

8 A Yes. 11:42:15

9 Q Okay. And can you tell me what the 11:42:16

10 inclusion of her name on this document refers to, 11:42:18

11 or why that name is there? 11:42:21

R 12 MS. BREDEHOFT: Objection. Foundation. 11:42:25

13 Hearsay. 11:42:27

14 Go ahead. 11:42:27

15 THE WITNESS: As she would have on here 11:42:31

16 for a gift between 100,000 and \$499,999. 11:42:34

17 BY MR. MONIZ: 11:42:45

18 Q And this is a -- the date on this 11:42:46

19 document, I think, was June of 2018. 11:42:49

20 Is that consistent with your 11:42:54

21 understanding? 11:42:56

22 A Yes. 11:42:56

23 Q Okay. As of June 2018, what -- well, 11:43:06

24 strike that. 11:43:08

25 As of June 2018, had Ms. Heard made any 11:43:10

1 payments to the Children's Hospital? 11:43:18
2 MS. BREDEHOFT: Object -- 11:43:24
3 THE WITNESS: Yes. 11:43:25
4 MS. BREDEHOFT: I'm sorry. 11:43:26
5 BY MR. MONIZ: 11:43:27
6 Q -- in satisfaction -- 11:43:27
7 A Go ahead. 11:43:27
8 Q -- of the \$3.5 million -- so let me start 11:43:27
9 that over. 11:43:30
10 So as of June 2018, had any payments been 11:43:34
11 made by Ms. Heard to the Children's Hospital in 11:43:39
12 connection with the \$3.5 million pledge, aside from 11:43:46
13 the original \$100,000 check from Mr. White in 11:43:53
14 August of 2016? 11:43:57
R 15 MS. BREDEHOFT: Objection. Leading. 11:44:00
16 Foundation. And hearsay. 11:44:01
17 Go ahead. 11:44:03
18 THE WITNESS: Yes. There was a 11:44:04
19 payment -- a gift on January 9th of 2018. 11:44:05
20 BY MR. MONIZ: 11:44:15
21 Q Okay. And what amount is that gift that 11:44:15
22 you're referring to? 11:44:18
23 A \$250,000. 11:44:19
24 Q Okay. And was that gift made by 11:44:25
25 Ms. Heard or on Ms. Heard's behalf? 11:44:27

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1 MS. BREDEHOFT: Objection. Hearsay. 11:44:32
2 Foundation. 11:44:33
3 Go ahead. 11:44:35
O, IU, 4 THE WITNESS: By Ms. Heard. 11:44:36
OQ
5 BY MR. MONIZ: 11:44:40
6 Q Okay. And what are you basing that 11:44:40
7 statement on? 11:44:42
O, IU, 8 A By the check that we received from 11:44:45
OQ 9 Fidelity -- a Fidelity Charity that came to 11:44:50
10 Children's Hospital Los Angeles. 11:44:59
11 (Reporter clarification.) 11:45:08
12 BY MR. MONIZ: 11:45:10
13 Q And the check from Fidelity Charity, was 11:45:11
14 that a check written by Ms. Heard? 11:45:13
15 A Like, her personally? 11:45:22
16 Q Sure. Let's start with that. 11:45:25
17 A No. 11:45:28
18 Q Okay. Does the check reflect that it's 11:45:28
19 drawn on an account held by Ms. Heard? 11:45:30
20 A I'd have to look at the check, if you 11:45:35
21 have that, which we produced for you. 11:45:38
22 Q Okay. We'll get on to that a little bit 11:45:40
23 later. 11:45:44
24 MR. MONIZ: For now, why don't we put on 11:45:47
25 Depp 10 on the screen. 11:45:50

R

1	(Deposition Exhibit 10 was marked	11:45:52
2	for identification.)	11:45:52
3	BY MR. MONIZ:	11:46:15
4	Q All right, Ms. Goldbronn, do you	11:46:16
5	recognize this document?	11:46:25
6	A Yes.	11:46:26
7	Q I'm sorry. I didn't hear your response.	11:46:27
8	A Yes.	11:46:29
9	Q What is this document?	11:46:29
10	A It's a letter to Mr. White from myself,	11:46:31
11	inquiring about further installments on the pledge	11:46:34
12	that had not been fulfilled.	11:46:42
13	Q Did you draft this letter?	11:46:45
14	A I did.	11:46:48
15	Q And did you send this letter?	11:46:50
16	A I did.	11:46:53
17	MR. MONIZ: And can we scroll down a	11:46:54
18	little bit to the -- towards the bottom of the	11:46:57
19	page. There we go.	11:47:00
20	BY MR. MONIZ:	11:47:00
21	Q Is that your signature there?	11:47:01
22	A It is.	11:47:02
23	MR. MONIZ: Okay. And if we scroll back	11:47:07
24	up to the page, it's -- there's a date in the top	11:47:09
25	right-hand corner there. It says "June 14, 2019."	11:47:12

R, L, 1
H, IR

BY MR. MONIZ:

11:47:15

Q Is that the date on which you signed and
sent this letter?

11:47:16

11:47:18

A It is.

11:47:19

MR. MONIZ: Okay. So I'm going to read
the first paragraph here:

11:47:28

11:47:29

"I am following up on a letter and

11:47:32

check mailed to Children's Hospital

11:47:34

Los Angeles Foundation on

11:47:36

August 24, 2016, in the name of

11:47:37

Amber Heard. In the

11:47:39

correspondence, see enclosed, it

11:47:41

states, 'the first of multiple

11:47:43

scheduled installments to honor the

11:47:45

full amount of Ms. Heard's

11:47:50

\$3,500,000 pledged gift.' Since

11:47:52

the first installment, CHLA has not

11:47:57

received further installments."

11:48:02

Now, have I accurately read what you
wrote to Mr. White on June 14, 2019?

11:48:04

11:48:07

MS. BREDEHOFT: Objection. Leading.

11:48:10

Improper use of a document. Hearsay. Foundation.

11:48:13

Go ahead.

11:48:15

THE WITNESS: Yes.

11:48:16

25

1 BY MR. MONIZ: 11:48:16
2 Q And why did you write this to Mr. White 11:48:17
3 on June 14th, 2019? 11:48:19
4 A I was trying to figure out if there were 11:48:21
5 any other payments coming from Mr. White to fulfill 11:48:25
6 the pledge, because we had -- because Children's 11:48:33
7 Hospital Los Angeles had not received any other 11:48:36
8 correspondence from him. 11:48:39
9 Q So you said in this document, "Since the 11:48:53
10 first installment, CHLA has not received further 11:48:55
11 installments." 11:49:00
12 Why did you -- why did you write that 11:49:02
13 particular language? 11:49:03
14 A Because that was the language that CHLA 11:49:08
15 had received, as far as installments, in the 11:49:11
16 initial correspondence from Mr. White. 11:49:16
17 Q And what did you understand the term 11:49:19
18 "installment" to mean? 11:49:22
19 A Pledged payment. 11:49:24
20 Q Okay. And so, as of the date of this 11:49:25
21 document, was this sentence accurate, that since 11:49:32
22 the first installment, CHLA has not received 11:49:37
23 further installments? 11:49:42
24 A From Mr. White, yes. 11:49:43
25 Q Okay. Now, did you get a response to 11:49:46

1 this letter? 11:49:54
2 A No. 11:49:55
3 Q Okay. Now, you say, from Mr. White, no 11:50:00
4 further installments have been received. 11:50:09
5 Are you stating that installments had 11:50:15
6 been received from other sources? 11:50:17
7 A Yes. 11:50:20
8 Q And in what amounts, and when? 11:50:20
9 A From Fidelity Charitable in January, for 11:50:25
10 \$250,000, January 2018, which we had previously 11:50:30
11 mentioned. 11:50:38
12 Q Okay. Do you have personal knowledge of 11:50:39
13 whether that money came directly from Ms. Heard? 11:50:51
R 14 MS. BREDEHOFT: Objection. Leading. 11:50:55
15 Foundation. And hearsay. 11:50:57
16 Go ahead. 11:50:59
17 THE WITNESS: I'd have to guess. 11:51:01
18 BY MR. MONIZ: 11:51:02
19 Q Okay. Does the Children's Hospital, to 11:51:03
20 your knowledge, have any record reflecting the 11:51:05
21 source of those funds being Ms. Heard? 11:51:08
22 MS. BREDEHOFT: Objection. Leading. 11:51:11
23 Hearsay. Foundation. 11:51:12
24 Go ahead. 11:51:14
25 THE WITNESS: The check came from 11:51:15

1 Fidelity and with reference that it was being 11:51:17
2 directed by Ms. Heard. 11:51:25

3 MR. MONIZ: Okay. We'll take a look at 11:51:31
4 the document in a moment. 11:51:33

5 Can I see -- can we mark this as 11:51:41
6 Exhibit 10, and then can I see number 11 on the 11:51:44
7 screen. 11:51:48

R 8 (Deposition Exhibit 11 was marked 11:51:48
9 for identification.) 11:51:48

10 BY MR. MONIZ: 11:52:01

11 Q All right. Now, do you recognize this 11:52:02
12 document? 11:52:04

13 A Yes. 11:52:05

14 Q And what is this document? 11:52:06

15 A It is a letter to Ms. Gottlieb from 11:52:10
16 myself, on behalf of Children's Hospital 11:52:17
17 Los Angeles, inquiring about additional gifts -- 11:52:19
18 pledged payment installments. 11:52:26

19 Q Did you prepare this letter? 11:52:29

20 A I did. 11:52:32

21 Q Did you send this letter? 11:52:33

22 A I did. 11:52:36

23 Q The date on this document is June 26th, 11:52:37
24 2019. 11:52:39

25 Is that the date on which you prepared 11:52:41

R 1 and sent this letter? 11:52:44

2 A I did, yes. 11:52:45

3 MR. MONIZ: Can we scroll down to the 11:52:46

4 bottom of the page, please. 11:52:48

5 BY MR. MONIZ: 11:52:50

6 Q If we look down there, we see again a 11:52:51

7 signature block. 11:52:53

8 Is that your signature? 11:52:54

9 A Yes. 11:52:55

10 Q Okay. 11:52:56

11 MR. MONIZ: Can we please scroll up 11:52:57

12 again, Alex. I apologize. 11:52:59

13 BY MR. MONIZ: 11:53:01

14 Q This letter appears to be directed to 11:53:03

15 Ms. Amber Heard, care of Jodi Gottlieb; is that 11:53:04

16 correct? 11:53:09

17 A Correct. 11:53:10

18 Q Who is Jodi Gottlieb? 11:53:11

19 A In the Children's Hospital Los Angeles 11:53:18

20 records, Jodi Gottlieb was our contact for 11:53:20

21 Ms. Amber Heard. 11:53:24

22 Q Okay. Beyond having her listed as a 11:53:29

23 contact, do you have any information about who she 11:53:31

24 is or what she does? 11:53:34

25 A No. 11:53:38

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1 Q Okay. You referred to a record of her as 11:53:38
2 a contact. 11:53:43
3 What record specifically are you 11:53:44
4 referring to? 11:53:47
5 A Our Children's Hospital Los Angeles 11:53:54
6 database. 11:53:56
7 Q And what exactly -- what exactly is that? 11:53:57
8 Is that -- 11:54:00
9 I'm just trying to get a general sense of 11:54:05
10 where you got -- of where you got the name Jodi 11:54:08
11 Gottlieb. That's all. 11:54:11
12 A Yes. The database keeps all records for 11:54:13
13 our donors, and information -- their contact 11:54:16
14 information, as well as any pledges, gifts, 11:54:23
15 information. 11:54:26
16 Q Okay. So it's -- what you're referring 11:54:32
17 to, then, is basically a list of donors and contact 11:54:34
18 information, essentially? 11:54:38
19 A Yeah. That's a very simple way of 11:54:39
20 putting it. 11:54:42
21 Q But -- simple, but is that the gist of 11:54:42
22 it? In other words, is that generally -- is that 11:54:46
23 generally an accurate characterization? 11:54:52
24 A I would say accurate -- it would be more 11:54:56
25 of a -- constituent management system more than a 11:54:59

1	list.	11:55:04
2	Q Okay. All right. Now, since -- okay.	11:55:09
3	I'm going to read again from this	11:55:20
4	document. It says:	11:55:21
5	"Dear Ms. Heard: I am following up	11:55:23
6	on the correspondence that	11:55:27
7	Children's Hospital Los Angeles	11:55:29
8	Foundation received on August 26,	11:55:29
9	2016 which CHLA was notified by	11:55:32
10	Edward White, Edward White &	11:55:35
11	Company, that a \$3.5 million gift	11:55:37
12	had been made in your honor. In	11:55:42
13	the correspondence, see enclosure,	11:55:44
14	it states, 'the first of multiple	11:55:47
15	scheduled installments to honor the	11:55:48
16	full amount of Ms. Heard's	11:55:53
17	\$3,500,000 pledged gift.' Since	11:55:56
18	the first installment, CHLA has not	11:56:01
19	received further installments."	11:56:05
20	Have I correctly read what you wrote to	11:56:06
21	Ms. Heard and to Ms. Gottlieb on June of 2019?	11:56:09
22	MS. BREDEHOFT: Objection. Leading. And	11:56:11
23	improper use of the document.	11:56:12
24	But you also did not accurately read it.	11:56:15
25	But go ahead.	11:56:19

1 THE WITNESS: Yes. 11:56:20

2 MS. BREDEHOFT: You missed "pledged" the 11:56:22

3 first time. The 3.5 million, you said "gift," you 11:56:24

4 didn't say "pledged." 11:56:29

5 MR. MONIZ: Well, apologies for that, but 11:56:31

6 I think we can all see that the word "pledged" does 11:56:33

7 appear there. And, obviously, the document 11:56:38

8 ultimately speaks for itself. 11:56:40

9 BY MR. MONIZ: 11:56:43

10 Q Ms. Goldbronn, why did you send this 11:56:44

11 letter to Ms. Heard and Ms. Gottlieb? 11:56:45

12 A I was trying to see if the pledge was 11:56:50

13 going to be fulfilled or not. 11:56:53

14 Q And you reference in this pledge 11:56:58

15 [verbatim] a first installment and then -- well, 11:57:03

16 strike that. 11:57:07

17 You reference in this letter: 11:57:08

18 "Since the first installment, CHLA 11:57:12

19 has not received further 11:57:15

20 installments." 11:57:17

21 Why did you include that language in this 11:57:19

22 letter to Ms. Heard and Ms. Gottlieb? 11:57:21

23 A Because we had received one installment 11:57:28

24 from Ms. Heard. 11:57:31

25 Q Okay. You state that we -- you had 11:57:38

1 received one installment from Ms. Heard. 11:57:40
2 And is that the original \$100,000 check 11:57:45
3 from Mr. White back in August of 2016? 11:57:48
4 MS. BREDEHOFT: Objection. Leading. 11:57:51
5 Foundation. Hearsay. 11:57:52
6 Go ahead. 11:57:54
7 THE WITNESS: No. It would be the 11:57:54
8 \$250,000. 11:57:55
9 MR. MONIZ: All right. Let's go to 11:58:07
10 exhibit -- can we go to 16. 11:58:08
11 Well, actually, first, can we make sure 11:58:25
12 we have this exhibit marked. I think it's 11. 11:58:28
13 THE STENOGRAPHER: It is. 11:58:31
14 MR. MONIZ: And then can we go to 11:58:32
15 Depp 16, please. 11:58:34
16 BY MR. MONIZ: 11:59:05
17 Q Ms. Goldbronn, do you recognize this 11:59:06
18 document? 11:59:07
19 A Yes. 11:59:08
20 Q What is this document? 11:59:10
21 A It's a notice from Fidelity Charitable to 11:59:14
22 Children's Hospital Los Angeles, letting us know 11:59:21
23 that there was an enclosed check for \$250,000. 11:59:25
24 Q Okay. And is the check for \$250,000 the 11:59:29
25 same \$250,000 donation that you have repeatedly 11:59:32

1	referenced as coming from Ms. Heard?	11:59:37
2	A Correct.	11:59:40
3	Q Okay. And this was a document received	11:59:45
4	by the Children's Hospital?	11:59:48
5	A Correct.	11:59:50
6	Q And produced as part of your document	11:59:51
7	production?	11:59:54
8	A Correct.	11:59:55
9	Q All right. I'm going to, again, read	11:59:57
10	from the document. This is dated January 9th,	11:59:59
11	2018. And the first paragraph states:	12:00:02
12	"Enclosed is a check in the amount	12:00:04
13	of \$250,000.00. This Fidelity	12:00:06
14	Charitable grant is made possible	12:00:10
15	through the generosity and	12:00:14
16	recommendation of a Fidelity	12:00:17
17	Charitable donor who wishes to	12:00:19
18	remain anonymous."	12:00:22
19	Have I correctly read the first paragraph	12:00:23
20	of this letter?	12:00:26
21	MS. BREDEHOFT: Objection. Leading.	12:00:27
22	Hearsay. And document speaks for itself.	12:00:28
23	Go ahead.	12:00:30
24	THE WITNESS: Yes.	12:00:31
25		

1 BY MR. MONIZ: 12:00:31

2 Q Okay. The document references a donor 12:00:33

3 who wishes to remain anonymous. 12:00:37

4 Do you know who the donor who wishes to 12:00:40

5 remain anonymous is? 12:00:43

6 MS. BREDEHOFT: Objection. Foundation. 12:00:45

7 Hearsay. 12:00:46

8 Go ahead. 12:00:47

9 THE WITNESS: Yes. It's a donation from 12:00:52

10 Amber Heard. 12:00:54

11 BY MR. MONIZ: 12:00:56

O, IU, 12 Q Well, hang on a second. 12:00:57
OA

13 I want to focus not on the -- not on the 12:01:01

14 second paragraph; I want to focus just on the first 12:01:03

15 paragraph here. 12:01:06

16 The document references "a Fidelity 12:01:07

17 Charitable donor who wishes to remain anonymous." 12:01:09

18 On what basis are you saying that that is 12:01:15

19 Amber Heard? 12:01:18

20 A If we're focusing just on the first 12:01:19

21 paragraph or first sentence, then I would have to 12:01:21

22 say that I do not know who the donor is, from that 12:01:24

23 first sentence. 12:01:30

24 Q Okay. So does the Children's Hospital 12:01:31

25 have any record -- any information, that you are 12:01:34

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1 aware of, identifying who the Fidelity Charitable 12:01:36
2 donor who wishes to remain anonymous is? 12:01:40
3 MS. BREDEHOFT: Objection. Leading. 12:01:45
4 Foundation. Hearsay. 12:01:49
5 Go ahead. 12:01:49
6 And the full document speaks for itself. 12:01:49
7 MR. BLESSEY: Counsel, are you asking 12:01:52
8 other than this document, Exhibit 12? Is that the 12:01:53
9 question? 12:01:56
10 MR. MONIZ: Other than this document. 12:01:58
11 THE WITNESS: This document is the 12:02:01
12 document that we have. 12:02:03
13 BY MR. MONIZ: 12:02:06
14 Q Okay. So when you -- when you say that 12:02:07
15 this donation came from Ms. Heard, are you basing 12:02:08
16 that statement on this document? 12:02:12
17 A Correct. 12:02:17
18 Q Are you basing that statement on anything 12:02:18
19 other than this document and what this document 12:02:20
20 says? 12:02:23
21 A Correct. This document. 12:02:28
22 Q Okay. Reading this -- reading this top 12:02:34
23 paragraph again, the second sentence -- I'm just 12:02:36
24 going to read it again: 12:02:40
25 "This Fidelity Charitable grant is 12:02:42

1 made possible through the 12:02:44
2 generosity and recommendation of a 12:02:46
3 Fidelity Charitable donor who 12:02:49
4 wishes to remain anonymous." 12:02:52
5 Based on that statement, do you believe 12:02:56
6 that this document is intended to or does disclose 12:02:57
7 the identity of the donor? 12:03:01
8 MS. BREDEHOFT: I'm going to object. 12:03:05
9 Asked and answered. Hearsay. Foundation. 12:03:06
10 Speculation. 12:03:08
11 Go ahead. 12:03:09
12 And it doesn't take into consideration 12:03:10
13 the full document, which, obviously, makes it 12:03:12
14 clear. 12:03:15
15 THE WITNESS: I'd have to say, if I'm 12:03:16
16 only looking at the first sentence of the full 12:03:17
17 document, then no. 12:03:21
18 BY MR. MONIZ: 12:03:23
19 Q Okay. I'm just -- I'm just going to 12:03:24
20 briefly -- 12:03:25
21 A But I'd have to look at the whole 12:03:26
22 document. 12:03:29
23 Q I'm just going to briefly note that -- 12:03:29
24 MS. BREDEHOFT: I'm sorry. I don't think 12:03:32
25 we got the full answer there. I think you 12:03:34

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1	interrupted, Sam.	12:03:37
2	Could you finish your answer again,	12:03:38
3	please.	12:03:40
4	THE WITNESS: Sure.	12:03:41
5	Lori, could you let me know where he	12:03:42
6	started to interrupt. I'm not sure.	12:03:44
7	(Record read as follows:	12:03:45
8	"THE WITNESS: I'd have to say, if	12:03:45
9	I'm only looking at the first	12:03:45
10	sentence of the full document, then	12:03:45
11	no.	12:03:45
12	"MR. MONIZ: I'm just going to	12:03:45
13	briefly --	12:03:45
14	"THE WITNESS: But I'd have to look	12:03:45
15	at the whole document.")	12:03:45
16	BY MR. MONIZ:	12:03:47
17	Q. Were you finished responding?	12:04:15
18	A. I was finished responding.	12:04:17
19	MR. MONIZ: Okay. Elaine, I'm going to	12:04:19
20	note for the record that this is not the first time	12:04:20
21	now -- I've been letting it slide. There have been	12:04:23
22	quite a few speaking objections and kind of	12:04:27
23	coaching of the witness here, which is not	12:04:30
24	appropriate. And I'm going to start noting that.	12:04:32
25	And we may have a dispute about that if it	12:04:34

1 continues. 12:04:38

2 BY MR. MONIZ: 12:04:38

R 3 Q Okay. So moving on, then, second 12:04:45

4 paragraph, it says: 12:04:46

5 "Designation: Donation from Amber 12:04:47

6 Heard." 12:04:51

7 Have I correctly read that? 12:04:53

8 A Yes. 12:04:55

9 Q Okay. Now, is your statement that this 12:04:56

10 document reflects a donation directly from 12:04:58

11 Ms. Heard based on anything other than that sentence? 12:05:07

12 A No. It's that sentence that makes this 12:05:11

13 donation directly from Ms. Heard. 12:05:12

14 MR. MONIZ: Okay. I'm going to move to 12:05:13

15 strike everything after the word "no" as 12:05:16

16 nonresponsive. 12:05:17

17 BY MR. MONIZ: 12:05:22

18 Q Given -- well, let me ask this. This 12:05:22

19 document is dated January 9th, 2018. 12:05:30

20 As of that date, were you employed by the 12:05:33

21 Children's Hospital? 12:05:37

22 A No. 12:05:41

23 Q Did you play any role in receiving this 12:05:42

24 document on behalf of the Children's Hospital? 12:05:45

25 A Receiving by Fidelity -- Fidelity 12:05:52

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1 Charitable? No. 12:05:55
2 Q Do you know who wrote this document? 12:06:12
3 A No. 12:06:13
4 Q Okay. Do you have any idea what they -- 12:06:14
5 what they intended to convey by this document, 12:06:20
6 outside of what the document states? 12:06:22
7 MS. BREDEHOFT: Objection. Calls -- 12:06:25
8 leading. And calls for hearsay. Foundation. 12:06:27
9 Speculation. 12:06:31
10 THE WITNESS: No. 12:06:32
11 BY THE STENOGRAPHER: 12:06:33
12 Q Other than this document, is the 12:06:34
13 Children's Hospital in possession of any records or 12:06:36
14 documents reflecting a direct monetary transfer 12:06:40
15 from Ms. Heard in the amount of \$250,000 to 12:06:43
16 Children's Hospital? 12:06:48
17 MS. BREDEHOFT: Objection. Leading. 12:06:49
18 Hearsay. Foundation. 12:06:50
19 Go ahead. 12:06:52
20 BY THE STENOGRAPHER: 12:06:56
21 Q No. 12:06:57
22 Do you know where the \$250,000 referenced 12:06:57
23 in this document came from? 12:07:00
24 MS. BREDEHOFT: Objection. Leading -- 12:07:02
25 (Simultaneous cross-talk.) 12:07:03

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1	BY MR. MONIZ:	12:07:05
2	Q In other words, do you know what the --	12:07:06
3	do you know -- do you know what the ultimate source	12:07:06
4	of the donation money was?	12:07:07
5	MS. BREDEHOFT: Objection. Leading.	12:07:10
6	Foundation. Hearsay. Speculation.	12:07:11
7	Go ahead.	12:07:14
8	MR. BLESSEY: Vague as to "ultimate	12:07:16
9	source."	12:07:17
10	If you understand what he's asking,	12:07:19
11	please respond.	12:07:20
12	THE WITNESS: The ultimate source, no.	12:07:21
13	Fidelity Charitable would be the source.	12:07:23
14	BY MR. MONIZ:	12:07:26
15	Q Okay.	12:07:26
16	So is it fair to say that your statements	12:07:32
17	that this donation was made from Ms. Heard, that's	12:07:39
18	your just interpretation of what this document	12:07:43
19	means, correct?	12:07:45
20	MS. BREDEHOFT: Objection. Leading.	12:07:47
21	Hearsay. Foundation. And misstates testimony.	12:07:48
22	Go ahead.	12:07:51
23	MR. BLESSEY: Yes. And I would add	12:07:52
24	argumentative.	12:07:56
25	MS. BREDEHOFT: Yeah.	12:07:57

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1	MR. BLESSEY: She's told you that the	12:07:57
2	document says "designation donation from Amber	12:07:59
3	Heard."	12:08:01
4	So what are you asking, Counsel? I don't	12:08:03
5	know how much clearer it can be.	12:08:06
6	MR. MONIZ: I think my question was	12:08:09
7	clear. I'm going to note again the speaking	12:08:10
8	objections are not appropriate.	12:08:13
9	BY MR. MONIZ:	12:08:15
10	Q Would you please answer the question.	12:08:15
11	MR. BLESSEY: Are you talking to me about	12:08:16
12	a speaking objection? Is that reference to me,	12:08:18
13	sir?	12:08:21
14	MR. MONIZ: Yes, sir, it is.	12:08:22
15	MR. BLESSEY: Okay. I'll ignore that.	12:08:24
16	Go ahead.	12:08:25
17	THE WITNESS: Sorry. What was your	12:08:27
18	question?	12:08:28
19	BY MR. MONIZ:	12:08:28
20	Q Are you basing your statement that	12:08:29
21	Ms. Heard donated \$250,000 on anything other than	12:08:30
22	your interpretation of this letter?	12:08:36
23	MS. BREDEHOFT: Same objections.	12:08:45
24	MR. BLESSEY: Join.	12:08:47
25	THE WITNESS: The word "interpretation"	12:08:47

1 is throwing me, so if you want to either rephrase 12:08:49
2 or move on. 12:08:56
3 BY MR. MONIZ: 12:09:03
4 Q I'll rephrase. 12:09:04
5 Is your statement that Ms. Heard donated 12:09:14
6 \$250,000 on January 9th, 2018, based on anything 12:09:18
7 other than you having read this document? 12:09:24
8 A Correct. This document is -- how this 12:09:28
9 document is written is how I base -- how we, at 12:09:29
10 Children's Hospital Los Angeles, base this gift to 12:09:34
11 be from Ms. Heard. 12:09:35
12 Q Okay. Okay. 12:09:39
13 Do anonymous -- do people ever make 12:09:50
14 donations to the Children's Hospital anonymously? 12:09:53
15 A Yes. 12:09:56
16 Q In your experience, is it common practice 12:09:57
17 for anonymous donors, when making donations, to in 12:10:02
18 one paragraph state that they wish to remain 12:10:08
19 anonymous, and in the very next paragraph identify 12:10:12
20 themselves? 12:10:15
21 MS. BREDEHOFT: Objection. Foundation. 12:10:17
22 Hearsay. Leading. And calls for a -- calls for 12:10:18
23 expert opinion. 12:10:22
24 But go ahead. 12:10:23
25 THE WITNESS: Yes. 12:10:25

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1	BY MR. MONIZ:	12:10:29
2	Q That is common?	12:10:30
3	A It is common for donors to want to remain	12:10:30
4	anonymous publicly but allow the charity to know	12:10:33
5	who they are.	12:10:37
6	Q Okay. Other than -- other than this --	12:10:40
7	other than this document -- well, strike that.	12:10:43
8	MR. MONIZ: All right. Let's go to	12:11:00
9	exhibit...	12:11:01
10	THE STENOGRAPHER: Was this one marked as	12:11:11
11	12?	12:11:13
12	MR. MONIZ: Yeah. Let's mark that one as	12:11:15
13	12.	12:11:17
14	(Deposition Exhibit 12 was marked	12:11:17
15	for identification.)	12:11:17
16	MR. MONIZ: And then with apologies for	12:11:19
17	the confusion, can I get Depp -- well, let's see --	12:11:21
18	Depp 17 on the screen.	12:11:26
19	And we'll mark that as 13.	12:11:28
20	(Deposition Exhibit 13 was marked	12:11:30
21	for identification.)	12:11:30
22	BY MR. MONIZ:	12:11:57
23	Q All right. And do you recognize this	12:11:59
24	document?	12:11:59
25	A I do.	12:12:00

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1 Q And, again, what is this document? 12:12:00

2 A It's a copy of a check for \$250,000 to 12:12:02
3 Children's Hospital Los Angeles from Fidelity 12:12:09
4 Charitable. 12:12:11

5 Q Okay. Do you see anything on this check 12:12:12
6 that reflects that the ultimate source of the funds 12:12:15
7 is Ms. Heard? 12:12:21

8 MS. BREDEHOFT: Objection. Leading. 12:12:22
9 Hearsay. Foundation. 12:12:23

10 Go ahead. 12:12:24

11 THE WITNESS: On this check, no. 12:12:25

12 MR. MONIZ: Okay. We can take that -- 12:12:28
13 let's mark that as 13, I think, and then we can 12:12:30
14 take that down. 12:12:34

15 Can I see Depp 14 on the screen, please. 12:12:57

16 BY MR. MONIZ: 12:13:16

17 Q And do you recognize this document? 12:13:17

18 A I do. 12:13:18

19 Q Okay. 12:13:19

20 MR. MONIZ: Before I go further, let's 12:13:20
21 mark this as Exhibit 14. 12:13:21

R 22 (Deposition Exhibit 14 was marked 12:13:01

23 for identification.) 12:13:01

24 BY MR. MONIZ: 12:13:22

25 Q What is this document, Exhibit 14? 12:13:27

1 A It's a letter from Ellen Cheney, who 12:13:35
2 works at Children's Hospital Los Angeles, 12:13:39
3 acknowledging a gift for \$500,000 to Children's 12:13:41
4 Hospital Los Angeles in honor of Ms. Heard. 12:13:47
5 MR. MONIZ: You know, apologies -- 12:14:04
6 apologies for the confusion. I think I actually 12:14:04
7 gave you the wrong -- the wrong exhibit there. 12:14:07
8 Can we actually -- well, no, maybe I 12:14:10
9 didn't. Nope, I didn't. But, actually, let's -- 12:14:13
10 let's take -- let's take that down. Sorry. 12:14:23
11 And let's go to -- let's see. Let's go 12:14:25
12 to the document that's marked, actually, as 12:14:37
13 Depp 12, originally. 12:14:41
14 And let's mark this as -- what are we up 12:15:05
15 to now? Exhibit 14? 12:15:11
16 THE STENOGRAPHER: This is 15. 12:15:13
17 MR. MONIZ: 15. Yeah, let's mark that as 12:15:14
18 Exhibit 15. 12:15:16
R 19 (Deposition Exhibit 15 was marked 12:14:43
20 for identification.) 12:14:43
21 BY MR. MONIZ: 12:15:16
22 Q And then, Ms. Goldbronn, are you familiar 12:15:17
23 with this document? 12:15:18
24 A I am. 12:15:19
25 Q Okay. And what is this document? 12:15:19

1 A It's a letter from Vanguard Charitable to 12:15:22
2 Ellen Cheney, who works for Children's Hospital 12:15:28
3 Los Angeles, letting us know that a gift from an 12:15:32
4 anonymous donor was made in the amount of \$500,000. 12:15:37
5 And it was to be used for unrestricted gifts. 12:15:48
6 Q Okay. And was this document produced as 12:15:53
7 part of the document production? 12:15:56
8 A It was. 12:15:58
9 Q Okay. Now, this references a grant from 12:15:59
10 an anonymous donor, like you just said, in the 12:16:05
11 amount of \$500,000. 12:16:08
12 And this also says that the recommending 12:16:10
13 donor wishes to remain anonymous. 12:16:12
14 Do you see where it says that? 12:16:17
15 A Yep. 12:16:19
16 Q Okay. Does the Children's Hospital know 12:16:19
17 who this anonymous donor is? 12:16:22
18 A We do not. 12:16:25
19 Q Okay. 12:16:27
20 MR. MONIZ: Okay. All right. We can 12:16:34
21 take that down. 12:16:45
22 BY MR. MONIZ: 12:16:46
23 Q So let me ask you, then, more generally, 12:16:48
24 so as of -- as of the time frame that we were just 12:16:51
25 talking about, the June 2018 time frame, how much 12:16:58

1 money in total does the Children's Hospital have 12:17:04
2 reflected as being donated from Ms. Heard? 12:17:08
3 A \$250,000. 12:17:14
4 Q Okay. Plus -- does that also include the 12:17:17
5 original \$100,000 back in August of 2016? 12:17:22
6 A That does not. It includes -- if we're 12:17:25
7 to include the 100,000, that would be at \$350,000. 12:17:28
8 Q Okay. But you're not including that? 12:17:37
9 A Well, you said "from Ms. Heard." 12:17:39
10 Q Okay. All right. 12:17:42
11 So as far as the Children's Hospital is 12:17:43
12 concerned, as of June 2018, the total donation 12:17:46
13 directly from Ms. Heard was \$250,000? 12:17:51
14 A Correct. 12:17:55
15 Q Okay. In the ensuing -- okay. And 12:17:55
16 between June 2018 and the dates on which you sent 12:18:03
17 the letters to Ms. Heard and Mr. White in June of 12:18:06
18 2019, were any additional funds received from 12:18:10
19 Ms. Heard? 12:18:15
20 A No. 12:18:16
21 Q Okay. So as of June 2018, a total of 12:18:18
22 \$250,000 had been received, as far as the 12:18:24
23 Children's Hospital is concerned, from Ms. Heard. 12:18:28
24 And that was the same amount that was -- 12:18:31
25 that had been donated a year later, in June of 12:18:32

1 2019. 12:18:36
2 Is that accurate? 12:18:37
3 A Correct. 12:18:40
R 4 Q Okay. As of the date of this deposition, 12:18:41
5 March 30th, 2021, how much in total has Ms. Heard 12:18:50
6 donated to the Children's Hospital? 12:18:54
7 A For this particular gift? I mean, for 12:19:02
8 the -- in her lifetime? 12:19:04
9 Q From 2016 to present. 12:19:06
10 A \$250,000. 12:19:08
11 Q Okay. So -- okay. So between, then, 12:19:10
12 August of 2016 and today's date in 2021, the only 12:19:19
13 gift that has been attributed to Ms. Heard is that 12:19:23
14 \$250,000 gift in 2017? 12:19:27
15 MS. BREDEHOFT: Objection to the form of 12:19:31
16 the question. Foundation. Hearsay. And leading. 12:19:33
17 Also I think it misstates the testimony. 12:19:38
18 But go ahead. 12:19:49
19 MR. BLESSEY: And vague as "attributed to 12:19:51
20 Ms. Heard." 12:19:52
21 If you understand what he's asking, go 12:19:54
22 ahead and respond. 12:19:57
23 THE WITNESS: Yeah. If you're asking for 12:19:57
24 what was attributed, then it would be \$350,000. 12:19:58
25 MR. MONIZ: Okay. All right. I 12:20:03

Transcript of Candie Davidson-Goldbronn, Designated Representative
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1 apologize if that question was unclear. So 12:20:04
2 maybe -- maybe I should ask that slightly 12:20:05
3 differently. Well, I think we actually maybe got 12:20:07
4 enough on that. 12:20:11

5 Can we throw back on the screen, please, 12:20:22
6 Exhibit -- I think it would be Exhibit 12. 12:20:26

R 7 Nope. Exhibit 11. Sorry. 12:20:46

8 BY MR. MONIZ: 12:21:04

9 Q Ms. Goldbronn, do you recall we were 12:21:05
10 speaking about this letter a few minutes ago? 12:21:06

11 A Correct. 12:21:09

12 Q All right. And this was the letter that 12:21:10
13 you sent to Ms. Heard, correct? 12:21:12

14 A Correct. 12:21:14

15 Q Did you ever get a response to this 12:21:17
16 letter? 12:21:19

17 A No. 12:21:20

18 Q Okay. Between -- between the date of 12:21:22
19 this correspondence in June of 2019 and the present 12:21:29
20 date, are you aware of any communications between 12:21:34
21 Ms. Heard and the Children's Hospital of 12:21:37
22 Los Angeles regarding her pledge to donate 12:21:39
23 \$3.5 million? 12:21:41

24 A No. There has not been any communication 12:21:44
25 from Ms. Heard. 12:21:49

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R, H 1 Q Okay. As of October of 2018, how much 12:22:00
2 money had Ms. Heard directly donated to the 12:22:08
3 Children's Hospital? 12:22:14
4 A \$250,000 -- 12:22:17
5 Q As of March 30th -- 12:22:20
6 A Sorry. I just realized. You said 12:22:26
7 "October 2018"? 12:22:27
8 Q Correct. 12:22:30
9 A Okay. Yeah. \$250,000. 12:22:32
10 Q Okay. As of March 30th, 2019, how much 12:22:38
11 money had Ms. Heard directly donated to the 12:22:42
12 Children's Hospital? 12:22:46
13 A \$250,000. 12:22:49
14 Q Okay. 12:22:52
15 MR. MONIZ: Can I see, please, Alex, on 12:22:54
16 the screen, Exhibit -- what we have marked as 12:22:56
17 Depp 20. Well, actually -- actually, sorry, Alex. 12:23:00
18 Hold off on that. 12:23:09
19 Can I actually see Exhibit -- this will 12:23:12
20 be Exhibit 18 -- or Depp 18. Can we mark this as 12:23:15
21 the next exhibit. Unfortunately, I've lost track 12:23:49
22 of where we are. 12:23:56
23 THE STENOGRAPHER: This will be 12:24:00
24 Exhibit 16. 12:24:00
25

Transcript of Candie Davidson-Goldbronn, Designated Representative
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1 (Deposition Exhibit 16 was marked 12:23:16
2 for identification.) 12:23:16
3 MR. MONIZ: Perfect. Thank you. 12:24:01
4 BY MR. MONIZ: 12:24:01
5 Q Mr. Goldbronn, do you recognize this 12:24:04
6 document? 12:24:05
7 A I do. 12:24:06
8 Q What is this document? 12:24:06
9 A It's the Honor Roll of Donors for 12:24:07
10 Children's Hospital Los Angeles. 12:24:11
11 MR. MONIZ: Okay. And -- let's see. I'm 12:24:11
12 trying to see if the date is on this page. It 12:24:13
13 looks like there's a reference to 2019 there. 12:24:15
14 Can you scroll down, Alex. A little bit 12:24:18
15 further. There we go. 12:24:27
16 BY MR. MONIZ: 12:24:30
17 Q Do you see a reference there to 12:24:32
18 "June 30th, 2019"? 12:24:33
19 A Yes. 12:24:36
20 Q Okay. Now, this document was not 12:24:37
21 produced as part of the Children's Hospital's 12:24:46
22 document production. 12:24:50
23 Do you know why not? 12:24:52
24 MS. BREDEHOFT: Objection to the form of 12:24:55
25 the question. Hearsay. Foundation. 12:24:56

1	Go ahead.	12:25:00
2	THE WITNESS: I don't know why.	12:25:03
3	BY MR. MONIZ:	12:25:06
4	Q I'm going to represent to you that I	12:25:06
5	actually obtained this document just off of the	12:25:08
6	website yesterday afternoon -- the Children's	12:25:10
7	Hospital's website yesterday afternoon.	12:25:14
8	Is it consistent with your understanding	12:25:17
9	that this document is publicly available on the	12:25:18
10	Children's Hospital's website?	12:25:24
11	MS. BREDEHOFT: Let me just -- wait. I'm	12:25:26
12	going to put the blanket objection on this. Even	12:25:27
13	though Mr. Moniz has obtained this yesterday, he	12:25:30
14	only gave it to me 45 minutes before this	12:25:33
15	deposition started. Again, same objections as	12:25:36
16	before.	12:25:39
17	And then I'm going to object as well on	12:25:39
18	the fact of authenticity, foundation, and hearsay	12:25:43
19	for this question, and leading for the question	12:25:46
20	that was just asked.	12:25:49
21	BY MR. MONIZ:	12:25:51
22	Q Do you remember the question?	12:25:52
23	A No. I was going to ask you to repeat it.	12:25:52
24	MR. BLESSEY: Can we have that read back,	12:25:55
25	please.	12:25:56

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1	(Record read as follows: "Q. I'm	12:25:57
2	going to represent to you that I	12:25:06
3	actually obtained this document just	12:25:08
4	off of the website yesterday	12:25:09
5	afternoon -- the Children's	12:25:11
6	Hospital's website yesterday	12:25:14
7	afternoon. Is it consistent with	12:25:16
8	your understanding that this	12:25:17
9	document is publicly available on	12:25:19
10	the Children's Hospital's website?"	12:25:21
11	MS. BREDEHOFT: Same objections.	12:26:21
12	Go ahead.	12:26:22
13	MR. BLESSEY: Okay. Let me just also add	12:26:23
14	the objection that it lacks foundation. You've not	12:26:24
15	asked this witness if she's ever seen it before, if	12:26:28
16	she knows when it was put up on the website,	12:26:31
17	whether that's before or after the production by	12:26:34
18	Children's Hospital.	12:26:36
19	So, in short, the objection is it lacks	12:26:38
20	foundation.	12:26:40
21	You might want to start by asking if	12:26:41
22	she's ever seen it before. Otherwise, she's	12:26:43
23	speculating. And, again, it lacks foundation.	12:26:46
24	BY MR. MONIZ:	12:26:50
25	Q You can answer.	12:26:51

1 MR. BLESSEY: Excuse me? 12:26:53
2 MR. MONIZ: I told the witness that she 12:26:55
3 could answer the question. 12:26:56
4 MR. BLESSEY: She can answer it if she 12:26:58
5 understands it. 12:27:00
6 And it sounds to me you're going to not 12:27:02
7 follow my recommendation, if you -- that is to 12:27:05
8 establish foundation, which is typically done in a 12:27:08
9 deposition when you show somebody a document. 12:27:12
10 Go ahead, if you understand what he's 12:27:14
11 asking. 12:27:17
12 THE WITNESS: I would have to speculate 12:27:18
13 on what your question is, actually. 12:27:19
14 BY MR. MONIZ: 12:27:22
15 Q Okay. My question is: Is it generally 12:27:23
16 consistent with your understanding that the 12:27:26
17 Children's Hospital publishes the Honor Roll in a 12:27:29
18 publicly available manner on its website? 12:27:32
19 That's the -- that's all the question is. 12:27:35
20 MS. BREDEHOFT: Objection. Leading. 12:27:38
21 Foundation. Hearsay. 12:27:39
22 Go ahead. 12:27:41
23 MR. BLESSEY: Yeah. She lacks 12:27:42
24 foundation. Once again, you're talking -- you're 12:27:43
25 asking about a general question in reference to a 12:27:45

Transcript of Candie Davidson-Goldbrom, Designated Representative
March 30, 2021

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1	specific document. So the question doesn't make	12:27:49
2	sense, to begin with.	12:27:51
3	And, secondly, you've not established the	12:27:53
4	foundation. She's going to tell you again that	12:27:55
5	she'd have to speculate.	12:27:57
6	MR. MONIZ: Okay. Again, I'm going to	12:27:59
7	take issue with the -- with the coaching of the	12:28:01
8	witness, who is perfectly capable of answering the	12:28:06
9	question herself.	12:28:11
10	Thank you for noting your objections.	12:28:12
11	The witness can now give her answer.	12:28:14
12	MR. BLESSEY: Counsel, just for the	12:28:18
13	record, I'm not coaching the witness. I'm coaching	12:28:19
14	you to get a question out after you've established	12:28:22
15	foundation.	12:28:24
16	MR. MONIZ: I'm not going to engage in a	12:28:25
17	back-and-forth on the record.	12:28:27
18	I've asked the questions. You're free to	12:28:28
19	state your objections for the record. Other than	12:28:31
20	that, I'm not going to waste time going back and	12:28:33
21	forth with counsel.	12:28:35
22	The witness can answer the questions to	12:28:36
23	the best of her ability. If the question is badly	12:28:38
24	phrased, that issue can be raised later on at	12:28:41
25	trial.	12:28:46

1 MR. BLESSEY: The problem is you are 12:28:47
2 wasting time by asking questions that lack 12:28:48
3 foundation. 12:28:48
4 Go ahead. 12:28:48
5 THE WITNESS: Yeah. I'd have to 12:28:49
6 speculate on your question. 12:28:51
7 BY MR. MONIZ: 12:28:52
8 Q So you have -- do you have any knowledge 12:28:53
9 of whether the Children's Hospital publishes the 12:28:53
10 Honor Roll in an available format? 12:28:58
11 MR. BLESSEY: Vague and ambiguous as to 12:29:02
12 time and as to which Honor Roll. 12:29:03
13 MS. BREDEHOFT: Leading. Hearsay. And 12:29:06
14 foundation. 12:29:07
15 Go ahead. 12:29:08
16 BY MR. MONIZ: 12:29:09
17 Q Let's start with the 2019 Honor Roll, the 12:29:10
18 one in front of you. 12:29:12
19 Do you recognize this document? 12:29:16
20 A Yes. 12:29:17
21 Q What is this document? 12:29:17
22 A The document is the Honor Roll for 12:29:18
23 Children's Hospital Los Angeles for the fiscal year 12:29:22
24 of 2019. 12:29:24
25 (Reporter clarification.) 12:29:32

1	BY MR. MONIZ:	12:29:33
2	Q And what is reflected on this document?	12:29:34
3	What is the 2019 Honor Roll?	12:29:36
4	MS. BREDEHOFT: Objection. Speaks for	12:29:42
5	itself.	12:29:43
6	But go ahead.	12:29:44
7	THE WITNESS: It's -- as it states, it's	12:29:45
8	the lifetime giving, as well as donors who have	12:29:46
9	given that fiscal year.	12:29:51
10	BY MR. MONIZ:	12:29:53
11	Q So donors who have given in that fiscal	12:29:55
12	year are identified on this document?	12:29:57
13	MS. BREDEHOFT: Objection. Leading.	12:29:59
14	Hearsay. Foundation. And mischaracterizes the	12:30:00
15	testimony.	12:30:03
16	Go ahead.	12:30:04
17	THE WITNESS: Within the document, the	12:30:09
18	section for donors is given for that year, fiscal	12:30:10
19	year.	12:30:14
20	BY MR. MONIZ:	12:30:14
21	Q Okay. In your experience, is this	12:30:16
22	document publicly available?	12:30:18
23	MS. BREDEHOFT: Objection. Leading.	12:30:23
24	Foundation. And calls for expert testimony.	12:30:24
25	Go ahead.	12:30:30

1	THE WITNESS: For the 2019 Honor Roll, it	12:30:32
2	was -- it's public.	12:30:36
3	BY MR. MONIZ:	12:30:38
4	Q And, in fact, you've previously testified	12:30:39
5	that the Children's Hospital publishes in a	12:30:40
6	magazine the Honor Roll, correct?	12:30:42
7	MS. BREDEHOFT: Objection. Leading.	12:30:46
8	Go ahead.	12:30:48
9	THE WITNESS: Correct. Children's	12:30:49
10	Hospital Los Angeles produces its Honor Roll	12:30:51
11	through its magazine.	12:30:53
12	MR. MONIZ: Okay. All right. I think	12:31:02
13	that's all for that document.	12:31:04
14	Can I see Depp 20.	12:31:05
15	(Deposition Exhibit 17 was marked	12:31:07
16	for identification.)	12:31:07
17	MR. MONIZ: Alex, can you go 40 seconds	12:31:32
18	into that video and hit "Play."	12:31:35
19	MR. BLESSEY: And this is another one	12:31:37
20	where, I'm -- before you do, I'm going to object.	12:31:39
21	This has not been provided and was not provided to	12:31:41
22	me in the --	12:31:43
23	MR. MONIZ: Well, let me stop you there,	12:31:45
24	Elaine, because this is from a document production	12:31:47
25	in this case. This was also provided to the	12:31:50

Transcript of Candie Davidson-Goldbrom, Designated Representative
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1	Virginia court back sometime in, I want to say,	12:31:52
2	December of 2020, in an email on which you were	12:31:55
3	copied.	12:31:58
4	As far as I'm concerned, this video has	12:31:59
5	been made abundantly available to Ms. Heard. And I	12:32:01
6	would caution you not to level too many accusations	12:32:05
7	here if you don't have a valid basis to do so.	12:32:08
8	MS. BREDEHOFT: I'm going to object to	12:32:13
9	your characterizations in your response, which is	12:32:14
10	highly offensive.	12:32:16
11	But I will still object on authenticity.	12:32:17
12	Hearsay. And foundation.	12:32:17
13	Go ahead.	12:32:17
14	MR. BLESSEY: Before we go any further --	12:32:19
15	this is Mr. Blessey --	12:32:20
16	I'm sorry, Elaine. Did I cut you off?	12:32:22
17	MS. BREDEHOFT: I was just going to say	12:32:25
18	outside the scope too.	12:32:26
19	But go ahead.	12:32:28
20	MR. BLESSEY: I'm sorry. I apologize.	12:32:30
21	I need an offer of proof that you're	12:32:31
22	going to ask this witness about a video.	12:32:33
23	So can I hear that please, Counsel.	12:32:36
24	MR. MONIZ: Counsel, I'm going to --	12:32:40
25	MR. BLESSEY: This may well go beyond the	12:32:42

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1	four topics that were identified for which this	12:32:44
2	deponent has been produced.	12:32:47
3	MR. MONIZ: And, Counsel, I'm going to	12:32:49
4	play the video, and then I'm going to ask the	12:32:51
5	witness a question.	12:32:53
6	MR. BLESSEY: I need --	12:32:54
7	MR. MONIZ: Upon my asking the witness a	12:32:54
8	question -- upon my asking the witness a question,	12:32:56
9	you are free to interpose any objections you wish.	12:33:00
10	But until the witness has been posed a	12:33:03
11	question, I'm entitled to provide whatever -- I'm	12:33:06
12	entitled to place this in front of the -- in front	12:33:11
13	of the witness.	12:33:12
14	So again, I will respectfully listen to	12:33:13
15	any objections you interpose after this video is	12:33:16
16	played. It's going to be about two minutes.	12:33:20
17	And then we're going to be just about	12:33:22
18	done, because, regardless of however many questions	12:33:24
19	Ms. Bredehoft has, I'm very close to wrapping up.	12:33:27
20	So I'm going to briefly play this, and we	12:33:30
21	can address any concerns you have about the	12:33:33
22	appropriateness at the point where I pose a	12:33:35
23	question. And it will be one or two questions at	12:33:38
24	most.	12:33:41
25	MR. BLESSEY: Okay. Well, I'm pleased to	12:33:42

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1 hear you're almost complete with your questioning. 12:33:43
2 But I've yet to hear an offer of proof 12:33:46
3 why you're showing this witness a videotape, which 12:33:49
4 I have no idea what it pertains to. 12:33:53
5 So can you give me an offer of proof 12:33:55
6 please, sir. 12:33:58
7 MR. MONIZ: You'll see the video. The 12:33:59
8 video will speak for itself. 12:34:00
9 Alex, would you please play it. 12:34:02
10 (Video played, not reported.) 12:34:06
11 MR. MONIZ: All right. Alex, you can 12:35:41
12 stop the video. And we can take that down. 12:35:43
13 BY MR. MONIZ: 12:35:47
14 Q So, Ms. Goldbronn, I'm just going to 12:35:48
15 briefly state that that document -- or that video, 12:35:50
16 I believe, is from October of 2018. 12:35:55
17 And my question is simply this: As of 12:35:57
18 October of 2018, how much money had Ms. Heard 12:36:00
19 donated to Children's Hospital? 12:36:04
20 MS. BREDEHOFT: Objection. I'm sorry. 12:36:06
21 I'm going to object because I need to get in the 12:36:06
22 objection of any part of that video being part of 12:36:10
23 this deposition. Authenticity. Foundation. 12:36:12
24 Hearsay. Outside the scope. 12:36:16
25 And then I'm going to ask -- and then I'm 12:36:17

1	going to say foundation and hearsay for the	12:36:20
2	question itself.	12:36:23
3	Go ahead.	12:36:24
4	MR. BLESSEY: Well -- and I will just	12:36:25
5	object that you just made my point about showing	12:36:26
6	the video. There was no need to show the video.	12:36:30
7	You've asked this question before, the very same	12:36:34
8	question: As of October 2018, how much money had	12:36:37
9	Ms. Heard donated to Children's Hospital?	12:36:41
10	And so I see no reason for this witness	12:36:44
11	to be shown this video, which just makes my point.	12:36:47
12	It's an improper use of the video, number one.	12:36:54
13	Number two, it lacks foundation.	12:36:57
14	Number three, you've already asked this	12:36:59
15	question. You could have just asked the question	12:37:01
16	again.	12:37:03
17	MS. BREDEHOFT: Join.	12:37:04
18	MR. BLESSEY: You're unnecessarily --	12:37:04
19	you're unnecessarily dragging out a deposition that	12:37:05
20	could have been completed probably within	12:37:08
21	30 minutes to get what you need.	12:37:11
22	MS. BREDEHOFT: Join in that.	12:37:14
23	MR. BLESSEY: The question has been	12:37:15
24	asked -- Counsel, the question has been asked and	12:37:16
25	answered.	12:37:19

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1	Did you not hear her answer previously?	12:37:20
2	BY MR. MONIZ:	12:37:23
3	Q Ms. Goldbronn, you can finish -- you can	12:37:24
4	answer the question, and then we're done.	12:37:26
5	MR. BLESSEY: I think we're done now.	12:37:29
6	She's asked and answered that question.	12:37:31
7	BY MR. MONIZ:	12:37:34
8	Q Ms. Goldbronn, as of October 2018, how	12:37:34
9	much money had Ms. Heard donated?	12:37:38
10	MS. BREDEHOFT: Objection --	12:37:41
11	MR. BLESSEY: That's asked and answered,	12:37:43
12	sir.	12:37:44
13	MR. MONIZ: I have not heard an	12:37:45
14	instruction not to answer.	12:37:46
15	Are you instructing her not to answer?	12:37:48
16	MR. BLESSEY: Tell what -- tell him	12:37:50
17	again.	12:37:51
18	THE WITNESS: \$250,000.	12:37:51
19	MR. MONIZ: Thank you.	12:37:53
20	MR. BLESSEY: Tell me you didn't hear	12:37:54
21	that.	12:37:55
22	MR. MONIZ: Thank you.	12:37:56
23	MR. BLESSEY: Are you done, Counsel?	12:37:57
24	MR. MONIZ: I'm done, reserving all	12:37:59
25	rights to come back after Elaine's cross.	12:38:01

1 MR. BLESSEY: Of course. 12:38:05

2 12:38:05

3 EXAMINATION 12:38:05

4 BY MS. BREDEHOFT: 12:38:06

5 Q All right. Do you -- and let me ask you 12:38:06

6 first, do you prefer Ms. Davidson-Goldbronn or just 12:38:09

7 Ms. Goldbronn? 12:38:12

8 A Ms. Goldbronn is fine. 12:38:14

9 Q Okay, great. 12:38:15

10 Do you need to take a break? 12:38:16

11 I'm probably going to go about 20 to 12:38:18

12 30 minutes. 12:38:21

13 So would you like to take a break before 12:38:23

14 I go, or would you like me to just launch in? 12:38:25

15 A You can just launch in. 12:38:29

16 Q Okay. Great. 12:38:30

17 And I will try to move it as quickly as I 12:38:31

18 can, and I appreciate you doing this. 12:38:34

19 Let me just ask you some preliminary 12:38:37

20 questions. 12:38:38

O,R, 21 Since you didn't come to Children's 12:38:39

F/A, 22 Hospital until 2018, are you familiar with any of 12:38:41

PK 23 Amber Heard's work with Children's Hospital over 12:38:43

24 the years? 12:38:47

25 MR. MONIZ: Objection. Vague and 12:38:48

Transcript of Candie Davidson-Goldbronn, Designated Representative
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1 ambiguous, including as to "work." Assumes facts 12:38:49
2 not -- facts not in evidence. Lacks foundation. 12:38:51
3 Calls for speculation. Relevance. 12:38:52

4 THE WITNESS: Yeah. Prior to my arrival 12:38:57

O,R, 5 in July of 2018, I was not aware of Ms. Heard's 12:38:59
F/A,
PK

6 volunteering with CHLA. 12:39:05

7 BY MS. BREDEHOFT: 12:39:08

O,R, 8 Q And are you aware of any donations that 12:39:09
F/A,
PK

9 Ms. Heard made to the Children's Hospital prior to 12:39:11

10 2016? 12:39:15

11 MR. MONIZ: Relevance. Beyond the scope 12:39:17

12 of the deposition categories, which are explicitly 12:39:19

13 limited to donations made in the 2016 time frame 12:39:23

14 and forward. 12:39:26

15 So beyond the scope. Vague and 12:39:28

16 ambiguous. Calls for speculation. Lacks 12:39:30

17 foundation. 12:39:32

O,R, 18 THE WITNESS: No. I'm not aware. 12:39:36
F/A,
PK

19 BY MS. BREDEHOFT: 12:39:38

20 Q Okay. Now, I'm going to take you to what 12:39:38

21 was the exhibit -- I'm going to try to use the same 12:39:41

O,R, 22 exhibits, so bear with me a minute. We have what I 12:39:47
F/A,
PK

23 believe is Depp Exhibit Number 3. 12:39:51

24 MS. BREDEHOFT: If we can pull that up, 12:39:54

25 Alex. 12:39:56

1 THE REMOTE TECHNICIAN: This is Alex, the 12:40:09
2 tech, speaking. 12:40:11
3 (Short technical discussion off the 12:40:13
4 stenographic record.) 12:40:13
5 BY MS. BREDEHOFT: 12:40:48
6 Q Now, Ms. Goldbronn, you were asked a 12:40:49
7 number of questions about this, but I want to just 12:40:50
8 go just a little bit further on this. 12:40:54
9 You were not at Children's Hospital at 12:40:58
10 the time this letter came in and this check for 12:41:00
11 100,000, correct? 12:41:03
12 MR. MONIZ: Objection. Compound. 12:41:05
13 Leading. 12:41:06
14 MS. BREDEHOFT: I'm allowed to lead -- 12:41:07
15 THE WITNESS: Correct. 12:41:09
16 MS. BREDEHOFT: -- this is not my 12:41:09
17 witness. 12:41:10
18 Go ahead. 12:41:10
19 THE WITNESS: I was -- correct. I was 12:41:11
20 not at Children's Hospital Los Angeles in 2016. 12:41:13
21 BY MS. BREDEHOFT: 12:41:20
22 Q In preparation for the deposition today, 12:41:21
23 as the person with the most knowledge of the 12:41:22
24 corporate designee, did you have any communications 12:41:25
25 with anyone at Children's Hospital about 12:41:27

Transcript of Candie Davidson-Goldbronn, Designated Representative
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1 Mr. White's letter and any discussions that might 12:41:32
2 have surrounded this letter? 12:41:34
3 MR. MONIZ: Objection. Vague and 12:41:38
4 ambiguous, including as to discussions that might 12:41:38
5 have surrounded this letter. Compound. 12:41:41
6 Go ahead. 12:41:47
7 MR. BLESSEY: I will join. 12:41:49
8 But she can answer. 12:41:52
9 THE WITNESS: I spoke with Tiffanie 12:41:53
10 Al-Nasser, who this letter was directed to, about 12:41:55
11 the letter and the copy of the check that came in 12:42:03
12 to see if she had any other communication with 12:42:06
13 Mr. White. And she had not. 12:42:10
14 BY MS. BREDEHOFT: 12:42:19
15 Q All right. 12:42:19
16 Now, if I can draw your attention -- 12:42:19
17 MS. BREDEHOFT: And, Alex, if I can take 12:42:21
18 over the screen, please. 12:42:22
19 BY MS. BREDEHOFT: 12:42:25
IU,OA 20 Q If I can draw your attention to the 12:42:26
21 section that says: 12:42:27
22 "This donation is being made in 12:42:29
23 accordance with Ms. Heard's pledged 12:42:31
24 gift of 350,000 [sic]." 12:42:34
25 Do you see that? 12:42:38

1 pledged gift is three to five years. 12:44:00
2 BY MS. BREDEHOFT: 12:44:02
3 Q Okay. 12:44:02
4 A And -- but, no, there's not a time length 12:44:02
5 that we would go beyond without that -- without 12:44:11
6 that donor's acknowledgment. 12:44:13
7 Q All right. And a pledged gift, then, if 12:44:16
8 I'm understanding you, could be 7, 10, 15 years, 12:44:19
9 correct? 12:44:22
10 MR. MONIZ: Objection. Lacks foundation. 12:44:23
11 Contemplation. Incomplete hypothetical. 12:44:26
12 Relevance. Beyond the scope of the deposition 12:44:29
13 categories. Vague and ambiguous. And compound. 12:44:31
14 THE WITNESS: Yes, it could. 12:44:37
15 BY MS. BREDEHOFT: 12:44:38
16 Q Okay. What was the time frame of 12:44:39
17 Ms. Heard's pledged gift of the 3.5 million 12:44:43
18 supposed to be paid over? 12:44:48
19 MR. MONIZ: Objection. Calls for 12:44:50
20 speculation. Lacks foundation. 12:44:50
21 MS. BREDEHOFT: I'll rephrase it. 12:44:55
22 BY MS. BREDEHOFT: 12:44:56
23 Q What is your understanding of the length 12:44:57
24 of time over which Ms. Heard pledged the gift of 12:45:00
25 3.5 million to Children's Hospital? 12:45:05

1 MR. MONIZ: Same objections. Lack 12:45:10
2 personal knowledge. Calls for speculation. Lacks 12:45:13
3 foundation. Beyond the scope. Vague and 12:45:16
4 ambiguous. Object to the extent that it calls for 12:45:17
5 improper secondary evidence of writings. Calls for 12:45:25
6 speculation. 12:45:35
7 THE WITNESS: There was no date 12:45:37
8 arrangement with Ms. Heard to have this pledge paid 12:45:38
9 off in a particular time. 12:45:42
10 BY MS. BREDEHOFT: 12:45:46
11 Q If Ms. Heard were to pay this -- the rest 12:45:48
12 of the 3.5 million in two years or five years, 12:45:50
13 would CH- -- would Children's Hospital welcome 12:45:55
14 that? 12:45:57
15 MR. MONIZ: Objection. Argumentative. 12:45:58
16 Relevance. Improper, incomplete hypothetical. 12:46:00
17 Calls for speculation. Way beyond the scope of the 12:46:08
18 deposition categories. 12:46:11
19 The witness was not designated to testify 12:46:13
20 as to the mood of CHLA or to its emotional reaction 12:46:16
21 to donations. 12:46:20
22 THE WITNESS: CHLA welcomes every and any 12:46:21
23 donation that comes its way. 12:46:27
24 BY MS. BREDEHOFT: 12:46:29
25 Q The next part -- and I've asked you this 12:46:31

1 in some respect, but I just want to make sure we're 12:46:32
2 clear that this check represents the first of 12:46:36
3 multiple scheduled installments to honor the full 12:46:39
4 amount of Ms. Heard's 3.5 million pledged gift. 12:46:44
5 What is your understanding, on behalf of 12:46:50
6 Children's Hospital, of over what period of time 12:46:52
7 those multiple scheduled installments were to be 12:46:55
8 paid? 12:46:58
9 MR. MONIZ: Objection. The document 12:46:59
10 speaks for itself. The witness's understanding is 12:47:00
11 really irrelevant. Calls for speculation. Vague 12:47:03
12 and ambiguous. 12:47:07
13 And I believe the witness has previously 12:47:08
14 testified that there was no specific schedule that 12:47:10
15 she's aware of. 12:47:13
16 MS. BREDEHOFT: Sam, you are making 12:47:16
17 speaking objections. They're improper. I'm going 12:47:18
18 to ask you to stop. 12:47:20
19 BY MS. BREDEHOFT: 12:47:22
20 Q But go ahead. 12:47:23
21 A There was no time frame that was listed 12:47:23
22 to make the installments. 12:47:26
23 Q And I'm going to also point out there's 12:47:33
24 no cc here to Ms. Heard. 12:47:35
25 Would you agree? 12:47:38

1 MR. MONIZ: Objection. The document 12:47:40
2 speaks for itself. 12:47:41
3 THE WITNESS: Agreed. 12:47:43
4 BY MS. BREDEHOFT: 12:47:43
5 Q Okay. And it indicates -- while this 12:47:45
6 letter is saying that it's enclosing a check of 12:47:47
7 100,000 -- we've seen that, and I'm not going to 12:47:50
8 waste your time by going to that again -- it says 12:47:53
9 "in the name of Amber Heard." 12:47:56
10 But when you answered Mr. Depp's 12:47:59
11 counsel's questions about how much Amber Heard had 12:48:01
12 paid towards the pledged gift, you did not include 12:48:05
13 this 100,000, correct? 12:48:08
14 A Correct. 12:48:10
15 Q And why is that? 12:48:11
16 A This one was made in her name; the other 12:48:16
17 gift was made from her directly -- 12:48:19
18 Q Is there a -- 12:48:21
19 A -- and Fidelity. 12:48:21
20 Q Okay. I'm sorry. 12:48:23
21 And is there a distinction at Children's 12:48:24
22 Hospital whether a payment comes in directly from 12:48:26
23 the individual or it is paid as a donation on her 12:48:30
24 behalf? 12:48:35
25 MR. MONIZ: Objection. Vague. Calls for 12:48:36

Transcript of Candie Davidson-Goldbronn, Designated Representative
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1 speculation. Vague including especially as to the 12:48:42
2 word "distinction." 12:48:46
3 Go ahead. 12:48:49
4 THE WITNESS: Yes. CHLA does distinguish 12:48:50
5 between when a donor makes a gift from their own 12:48:54
6 funds, or they have funds that they direct 12:48:57
7 themselves, than from a third-party entity making a 12:49:01
8 donation in their name. 12:49:05
9 BY MS. BREDEHOFT: 12:49:09
10 Q Okay. Thank you. 12:49:09
11 The last thing I'm just going to point 12:49:10
12 out is the date on this letter of August 24, 2016. 12:49:12
13 In your preparation for this deposition 12:49:16
14 today, what, if any, discussions did you have about 12:49:19
15 whether Ms. Heard or any of her representatives may 12:49:27
16 have had conversations with other Children's 12:49:30
17 Hospital people other than the two you talked to, 12:49:33
18 Ms. Cheney and Ms. Al-Nasser? 12:49:36
19 MR. MONIZ: Objection. 12:49:40
20 THE WITNESS: I did not have any other 12:49:42
21 conversations besides those two individuals. 12:49:44
22 BY MS. BREDEHOFT: 12:49:46
23 Q Okay. And I just want to make sure that 12:49:47
24 I'm clear on that. 12:49:50
25 I thought that you asked -- at the 12:49:51

1 beginning of your deposition, you asked Ms. Cheney 12:49:53
2 and Ms. Nasser [sic] whether they had any 12:49:56
3 conversations from 2018 on. 12:50:00
4 Did you mean 2016? 12:50:02
5 A Correct. For Ms. Al-Nasser, I asked from 12:50:07
6 when she first received the check. 12:50:11
7 Q Okay. So just so that we can complete 12:50:13
8 that, you, in preparation for your deposition 12:50:16
9 today, asked Ms. Cheney and Ms. Al-Nasser whether 12:50:20
10 they had had any communications with Ms. Heard or 12:50:23
11 her representatives in connection with her pledge; 12:50:26
12 is that correct? 12:50:29
13 A That is correct. 12:50:31
14 Q And the two of them, Ms. Cheney and 12:50:32
15 Ms. Al-Nasser, had not had conversations with 12:50:34
16 Ms. Heard or any of her representatives about her 12:50:38
17 pledge of the 3.5 million, correct? 12:50:41
18 A That is correct. 12:50:45
19 Q All right. And that would include, then, 12:50:46
20 that they would not have had any communications 12:50:48
21 with Ms. Heard or her representatives over what 12:50:51
22 period of time she intended to pay her pledged 12:50:53
23 gift, correct? 12:50:58
24 MR. MONIZ: Objection. Asked and 12:50:59
25 answered. 12:51:00

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1 THE WITNESS: That is -- 12:51:00
2 MR. MONIZ: Vague. Calls for 12:51:00
3 speculation. Incomplete hypothetical. 12:51:01
4 (Reporter clarification.) 12:51:08
5 THE WITNESS: That's correct. 12:51:07
6 MS. BREDEHOFT: Okay. Thank you. 12:51:13
7 Now, I'm going to ask to take this one 12:51:13
8 down, Alex, if you will. 12:51:16
9 And let's go to what I think was Depp 12:51:19
10 Exhibit Number -- I think it was 4. Give me a 12:51:22
11 quick second. 12:51:25
12 No, 2. Let's go to 2. 12:51:26
13 BY MS. BREDEHOFT: 12:51:39
14 Q Now, the date on the letter from 12:51:39
15 Mr. White was August 24. And the date on this 12:51:41
16 exhibit is August 19, 2016. 12:51:45
17 Do you see that? 12:51:49
18 A Yes. 12:51:51
19 Q Okay. And this is the one that has -- if 12:51:52
20 I may -- this is the one that has the announcement 12:51:59
21 that starts out about the 7 million, correct? 12:52:06
22 MR. MONIZ: Objection. The document 12:52:10
23 speaks for itself. Vague and ambiguous as to 12:52:11
24 "announcement." 12:52:13
25

1 BY MS. BREDEHOFT: 12:52:15

2 Q All right. But would you -- would you 12:52:16

3 agree that this has predated the letter from 12:52:16

4 Mr. White? 12:52:21

5 MR. MONIZ: Objection. The documents 12:52:22

6 speak for themselves. 12:52:23

7 If you're asking the witness to testify 12:52:25

8 with respect to the generation of these documents, 12:52:27

9 I believe you've previously strenuously objected 12:52:32

10 that she has no personal knowledge on that. 12:52:35

11 MS. BREDEHOFT: I'm asking just about the 12:52:39

12 date. 12:52:42

13 BY MS. BREDEHOFT: 12:52:42

14 Q Would you agree that date is before -- 12:52:43

15 A Yes. 12:52:44

16 Q -- Mr. White's letter? 12:52:44

17 A The date -- correct. The date is 12:52:46

18 August 19th, 2016. 12:52:47

19 Q Thank you. 12:52:49

20 MS. BREDEHOFT: And then if we can go to 12:52:50

21 Exhibit Number 4, please. That's Depp Exhibit 12:52:51

22 Number 4. I'm going to try to use his to keep this 12:52:54

23 moving. 12:52:58

24 Are we at 4 yet? This is 2. 12:53:13

25 Alex -- okay. All right. 12:53:15

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1 And then I'm going to ask to take control 12:53:17
2 again. 12:53:18
3 BY MS. BREDEHOFT: 12:53:20
4 Q And I'm going to ask you to take a look 12:53:21
5 at the date on this article too. It's August 18. 12:53:22
6 There we go. August 18. Do you see 12:53:30
7 that? 12:53:31
8 That's -- that's also before Mr. White's 12:53:32
9 letter, correct? 12:53:34
10 A Correct. 12:53:38
11 Q All right. And this is the one that 12:53:39
12 includes the quote from the hospital's CEO Paul 12:53:43
13 Viviano -- correct? -- thanking Heard in a 12:53:51
14 statement: 12:53:56
15 "Her generosity will support the 12:53:56
16 lifesaving treatments and cures 12:53:59
17 that Children's Hospital 12:54:00
18 Los Angeles provides for critically 12:54:02
19 ill children each year." 12:54:04
20 Do you see that? 12:54:06
21 A Yes, I see that. 12:54:06
22 Q Okay. What, if any, communications did 12:54:12
23 you have with the CEO Paul Viviano in preparation 12:54:15
24 for your deposition today about any communications 12:54:18
25 he may have had with Ms. Heard or her 12:54:20

O, H, R,
F/A, PK

R, F/A,
PK

1 representatives about her pledged gift?

12:54:23

2

A I have not had any communication with

12:54:29

3

Paul Viviano about this gift.

12:54:32

4

Q So would it be fair to say that if there

12:54:34

5

were some direct communications between Mr. Viviano

12:54:37

6

and Ms. Heard or her representatives relating to

12:54:39

7

the \$3.5 million pledged gift, you would not be

12:54:42

8

aware of it?

12:54:47

9

MR. MONIZ: Objection. Calls for

12:54:48

10

speculation. Improper, incomplete hypothetical.

12:54:49

11

Lacks foundation. Assumes facts not in evidence.

12:54:52

12

Vague and ambiguous. And argumentative.

12:54:57

13

MS. BREDEHOFT: Okay.

12:55:02

R, F/A,
PK

14

THE WITNESS: If they had conversations,

12:55:03

15

I'm unaware.

12:55:04

16

BY MS. BREDEHOFT:

12:55:05

R, F/A,
PK

17

Q Okay. And you're not aware -- just so

12:55:06

18

we're clear on the record, you're not aware, one

12:55:06

19

way or the other, whether Mr. Viviano had any

12:55:09

20

communications with Ms. Heard or her

12:55:12

21

representatives respecting the \$3.5 million pledged

12:55:14

22

gift, correct?

12:55:20

23

A Correct.

12:55:24

24

MS. BREDEHOFT: Okay. We can take this

12:55:24

25

one down, Alex.

12:55:26

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1 And then let's go to -- 12:55:28

2 BY MS. BREDEHOFT: 12:55:33

3 Q Before we go to another one, let me just 12:55:33
4 ask you a question. 12:55:35

5 I thought that you said that you pulled 12:55:37
6 pledged payments or something along that line. And 12:55:44
7 I might have gotten that wrong. 12:55:47

8 Do you have some kind of a document -- 12:55:50

9 MS. BREDEHOFT: Alex, you can still take 12:55:52
10 this down. I'm not asking about this anymore. 12:55:54

11 BY MS. BREDEHOFT: 12:55:57

R 12 Q Do you have some type of document at 12:55:59
13 Children's Hospital that -- that tracks pledged 12:56:00
14 payments or shows over what period of time pledges 12:56:02
15 are going to be paid? 12:56:04

16 MR. MONIZ: Objection. Compound. Vague 12:56:07
17 and ambiguous. Calls for speculation. Lacks 12:56:12
18 foundation. And is beyond the scope of the 12:56:14
19 deposition categories. 12:56:17

20 MR. BLESSEY: I will join on the compound 12:56:18
21 aspect. 12:56:20

22 Go ahead. 12:56:21

R 23 THE WITNESS: Yes. We have a database 12:56:21
24 system that we track all of our pledges and gifts 12:56:23
25 and pledged payments for what some have referred to 12:56:28

Transcript of Candie Davidson-Goldbronn, Designated Representative
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R, F/A, 1 as "installments" in a structured system that we 12:56:32
PK 2 also keep all of our documentations for donors in. 12:56:37

3 BY MS. BREDEHOFT: 12:56:48

R, F/A, 4 Q So was there ever a document generated 12:56:49
PK 5 that reflected what the pledged payments were going 12:56:51
6 to be for Ms. Heard for the 3.5 million? 12:56:54

7 MR. MONIZ: Objection. Lacks foundation. 12:56:59

8 Calls for speculation. Vague and ambiguous. 12:57:02

9 Relevance. Beyond the scope. 12:57:12

R, F/A, 10 THE WITNESS: Not that I'm aware of. 12:57:14
PK

11 BY MS. BREDEHOFT: 12:57:16

12 Q Okay. Thank you. 12:57:16

13 Let's go to -- I just want to make sure 12:57:18

14 that I understood. 12:57:24

15 You were asked some questions about when 12:57:24

16 someone says that they want to remain anonymous, 12:57:27

17 but they tell you, you know, where the designation 12:57:29

18 goes. 12:57:36

19 And I thought you said that that happens 12:57:36

20 in times where people are not looking for 12:57:38

21 publicity; they generally don't want the press. 12:57:41

22 Is that accurate? 12:57:44

23 MR. MONIZ: Well, objection. Calls for 12:57:45

24 speculation. 12:57:47

25 Are you asking her to testify about the 12:57:48

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1	mental state of other people?	12:57:49
2	Objection. Lacks foundation. Calls for	12:57:52
3	speculation.	12:57:52
4	MS. BREDEHOFT: I'm asking to clarify her	12:57:53
5	testimony. I believe she said that, and I just	12:57:54
6	want to make sure that's what she said.	12:57:56
7	MR. MONIZ: Well, I -- first, I don't	12:57:58
8	think that's an accurate statement of her	12:58:00
9	testimony.	12:58:02
10	But, either way, object to -- to lacking	12:58:03
11	foundation. Calling for speculation.	12:58:05
12	THE WITNESS: We do have donors who allow	12:58:08
13	us, at the organization, Children's Hospital	12:58:10
14	Los Angeles, to know who they are, but they do want	12:58:13
15	to remain anonymous publicly.	12:58:18
16	BY MS. BREDEHOFT:	12:58:26
17	Q Okay. Now, I'm going to ask you to take	12:58:26
18	a look at what was --	12:58:28
19	MS. BREDEHOFT: I'm a little confused on	12:58:35
20	his order on this one, so maybe I might have to	12:58:36
21	pull mine up on this one.	12:58:40
22	So, Alex, I'm going to pull -- and I want	12:58:42
23	to do this quickly. I'm going to pull the -- I'm	12:58:45
24	going to pull our Exhibit Number 7.	12:58:52
25		

1 (Deposition Exhibit 18 was marked 12:59:22
2 for identification.) 12:59:22
3 BY MS. BREDEHOFT: 12:59:22
4 Q Now, you were already asked about -- from 12:59:22
5 Mr. Moniz, Mr. Depp's counsel, about the \$500,000 12:59:25
6 donation that was made on -- made on Ms. Heard's 12:59:30
7 behalf. 12:59:32
8 Do you recall that? 12:59:34
9 A Correct. In her honor. 12:59:34
10 Q In her honor. 12:59:38
11 And how does Children's Hospital 12:59:39
12 characterize that, or classify that, if you will, 12:59:42
13 in connection with donations made by a particular 12:59:45
14 person? 12:59:50
15 MR. MONIZ: I'm sorry. Can I have that 12:59:51
16 question read back. I'm not sure I followed. 12:59:53
17 (Record read as follows: "Q. How 12:59:56
18 does Children's Hospital 12:59:56
19 characterize that, or classify that, 12:59:56
20 if you will, in connection with 12:59:56
21 donations made by a particular 12:59:56
22 person?") 12:59:56
23 MR. MONIZ: So I'm going to object that 01:00:10
24 that's vague. Ambiguous. Beyond the scope. Lacks 01:00:11
25 foundation. And calls for speculation. 01:00:14

Transcript of Candie Davidson-Goldbrom, Designated Representative
March 30, 2021

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1 THE WITNESS: If you could -- 01:00:18
2 BY MS. BREDEHOFT: 01:00:19
3 Q Yeah. What I'm asking -- 01:00:20
4 A If you could repeat the question. 01:00:21
5 Q I'm sorry. Yes. Yes. I'll -- you look 01:00:22
6 a little confused, so let me try to see if I can 01:00:23
7 ask that better. 01:00:27

O,H
FSPK

8 You've got here, in this -- and this is a 01:00:29
9 letter to Ms. Heard from Children's Hospital on 01:00:31
10 July 18 -- if I could just try to get that -- on 01:00:34
11 July 18, 2017. And it's from Children's Hospital. 01:00:44
12 I'm going to scroll down just to show you 01:00:48
13 who wrote it. That's Ellen Cheney. 01:00:52
14 That's the person we talked about 01:01:01
15 earlier -- right? -- that you had spoken with? 01:01:03
16 A Yes. 01:01:05
17 Q And it says: 01:01:05
18 "Children's Hospital Los Angeles 01:01:06
19 would like to extend our heartfelt 01:01:07
20 appreciation to you for 01:01:09
21 recommending that a \$500,000 01:01:11
22 donation be made to the hospital by 01:01:13
23 an anonymous donor." 01:01:15
24 Do you see that? 01:01:17
25 A Correct. 01:01:18

1 Q Okay. So how did Children's Hospital 01:01:18
2 characterize this \$500,000 donation that was made 01:01:21
3 by the recommendation of Amber Heard? 01:01:27
4 MR. MONIZ: Objection. Vague and 01:01:33
5 ambiguous. Calls for speculation. 01:01:33
6 THE WITNESS: We characterized it as a 01:01:38
7 gift from the anonymous donor, and that Ms. Heard 01:01:39
8 helped assist recommending that the gift be made to 01:01:51
9 Children's Hospital Los Angeles. 01:01:55
10 BY MS. BREDEHOFT: 01:01:58
11 Q And so, in your database, how would you 01:01:59
12 reflect this \$500,000 payment? 01:02:02
13 MR. MONIZ: Same objections. Beyond the 01:02:07
14 scope. 01:02:09
15 I apologize, Ms. Goldbronn, if you can 01:02:09
16 just give me one moment to quickly interpose an 01:02:12
17 objection. 01:02:15
18 Vague and ambiguous. Lacks foundation. 01:02:16
19 Calls for speculation. Beyond the scope. 01:02:18
20 Please go ahead. 01:02:21
21 THE WITNESS: Yeah. Within our database, 01:02:23
22 it would be a gift -- a new gift of \$500,000 that 01:02:24
23 was in honor of Ms. Heard, but not -- not a payment 01:02:30
24 or installment to Ms. Heard. 01:02:38
25

1	BY MS. BREDEHOFT:	01:02:41
2	Q Okay. So if I'm understanding the	01:02:42
3	different characterizations by Children's Hospital	01:02:43
4	over this period August 24, 2016, into 2018,	01:02:46
5	Ms. Heard made a direct payment of 250,000, an	01:02:57
6	installment was made on her behalf of \$100,000, and	01:03:02
7	a \$500,000 donation was made at her recommendation.	01:03:07
8	Is that accurate?	01:03:11
9	MR. MONIZ: Objection. That's testimony,	01:03:12
10	not a question. Calls for speculation. Lacks	01:03:14
11	foundation. Hearsay to the extent that it -- and	01:03:19
12	it appears to be an improper secondary evidence of	01:03:22
13	writings. Vague and ambiguous. Calls for a legal	01:03:26
14	conclusion.	01:03:27
15	Calls for a conclusion, generally, as to	01:03:28
16	the categorization and labeling of payments made in	01:03:30
17	connection with Ms. Heard.	01:03:34
18	THE WITNESS: Yeah. There would be	01:03:42
19	\$100,000 was made, the \$250,000 was also applied to	01:03:44
20	the \$3.5 million pledge.	01:03:51
21	And this \$500,000 was made in her honor,	01:03:54
22	which does not reflect a pledge payment.	01:03:58
23	BY MS. BREDEHOFT:	01:04:01
24	Q All right. So would it be fair to say	01:04:02
25	that there was a total of \$850,000 that was paid to	01:04:04

1 Children's Hospital -- or donated to Children's 01:04:10
2 Hospital -- that was in some way connected to Amber 01:04:13
3 Heard, between August 2016 and January 2018? 01:04:16

4 MR. MONIZ: Objection. Argumentative. 01:04:24
5 Vague and ambiguous, including and especially as to 01:04:26
6 the phrase "in some way connected to." Lacks 01:04:28
7 foundation. Calls for speculation. And calls for 01:04:36
8 an opinion. 01:04:40

9 That's fine. Go ahead. 01:04:41

10 THE WITNESS: Yeah. If you want to 01:04:44
11 rephrase the question for me. 01:04:45

12 BY MS. BREDEHOFT: 01:04:47

13 Q Yes. 01:04:48

O,R,H 14 Would it be fair to say that Amber Heard 01:04:48
15 caused to be donated \$850,000 to Children's 01:04:50
16 Hospital over the period August 2016 through 01:04:54
17 January 2018? 01:04:59

18 MR. MONIZ: Objection. Lacks foundation. 01:05:01
19 Calls for speculation. The witness has no personal 01:05:03
20 knowledge -- or at least no foundation has been 01:05:07
21 laid for the witness's personal knowledge as to the 01:05:09
22 motivation or reasons for any anonymous donor. 01:05:14
23 Vague and ambiguous. Calls for an opinion. 01:05:19
24 Argumentative. 01:05:19

25 MR. BLESSEY: You're not trying to coach 01:05:24

1 the witness, are you, sir? 01:05:25

2 MS. BREDEHOFT: He definitely is. He 01:05:27

3 definitely is guilty of that, Mr. Blessey. Thank 01:05:30

4 you for pointing that out. I've never heard so 01:05:33

5 many objections. 01:05:37

6 MR. BLESSEY: Do you have the question in 01:05:40

7 mind? 01:05:43

8 THE WITNESS: Yeah, Ellen, could you -- 01:05:44

9 or, Lori, could you repeat the question. Sorry. 01:05:44

10 (Record read as follows: "Q. Would 01:05:46

11 it be fair to say that Amber Heard 01:05:46

12 caused to be donated \$850,000 to 01:05:46

13 Children's Hospital over the period 01:05:46

14 August 2016 through January 2018?") 01:05:46

15 MR. MONIZ: Same objections. Also -- 01:06:04

16 also vague and calls for a conclusion as to the 01:06:05

17 phrase "caused to be donated." 01:06:09

O, R, H, 18 THE WITNESS: Yes. CHLA would -- does 01:06:16

FSPK 19 look at that, because that -- Ms. Heard was the 01:06:18

20 cause for 850,000 during that time period. 01:06:25

21 MS. BREDEHOFT: Thank you. 01:06:30

22 MR. MONIZ: To the extent that my -- I 01:06:31

23 apologize, Elaine. 01:06:33

24 To the extent that my objection before 01:06:34

25 was incomplete -- and I actually can't recall 01:06:36

1	whether I specifically stated this objection or	01:06:39
2	not, but I want to make sure it's clear on the	01:06:40
3	record.	01:06:43
4	Lack of foundation. Calls for	01:06:44
5	speculation as to the reasons for any donation made	01:06:45
6	by an anonymous donor. And also beyond the scope	01:06:50
7	of the topics for which this witness was designated	01:06:53
8	to testify.	01:06:58
9	MS. BREDEHOFT: You don't get to do ones	01:06:59
10	after the fact, but that's okay. Let's keep	01:07:02
11	moving.	01:07:03
12	MR. MONIZ: We can fight about that later	01:07:04
13	on.	01:07:05
14	MS. BREDEHOFT: Alex, can you pull this	01:07:07
15	one down, and can you give me what we've marked as	01:07:08
16	Exhibit Number 9.	01:07:08
17	It has some duplication, but mine is so	01:07:09
18	much shorter, that I just thought it made some	01:07:12
19	sense.	01:07:15
20	Oh, and did we label this one? Is this	01:07:15
21	one of mine, or did we take theirs?	01:07:18
22	(Short technical discussion off the	01:07:23
23	stenographic record.)	01:07:23
24	MS. BREDEHOFT: So the letter dated	01:09:01
25	July 18, 2017, to Ms. Amber Heard from Children's	01:09:02

1 Hospital, is Exhibit Number 18. Correct? 01:09:06
2 THE STENOGRAPHER: Yes. 01:09:13
3 MS. BREDEHOFT: Okay. Let's take that 01:09:13
4 one down. 01:09:15
5 And what I would like you to bring up, if 01:09:16
6 you can, Alex, is my Exhibit Number 9. And we'll 01:09:18
7 go ahead and label it 19, so we can keep this 01:09:22
8 going. 01:09:25
9 (Deposition Exhibit 19 was marked 01:09:27
10 for identification.) 01:09:27
11 BY MS. BREDEHOFT: 01:09:40
12 Q Now, Ms. Goldbronn, I'm going to ask you 01:09:41
13 to take a look at this again. 01:09:42
14 You've already testified to it, but I 01:09:44
15 wanted to focus your attention on one particular 01:09:45
16 part of it. And that is that it says: 01:09:49
17 "This Honor Roll recognizes" -- 01:09:51
18 I'm having a hard time getting this 01:09:54
19 highlighted. There we go. 01:09:56
20 "This Honor Roll recognizes 01:09:58
21 donors" -- 01:10:02
22 It's up here, on that right-hand side. 01:10:03
23 Can you see my -- for some reason, it's not 01:10:04
24 working. 01:10:04
25 "This Honor Roll recognizes donors 01:10:06

1 for contributions of \$1,000 or more, 01:10:08
2 as well as the full value of any 01:10:12
3 active pledge commitments made in 01:10:15
4 prior fiscal years." 01:10:18
5 Do you see that? 01:10:20
6 A Yes. 01:10:21
7 Q Can you explain to me what that means? 01:10:21
8 MR. MONIZ: Objection. The document 01:10:23
9 speaks for itself. Beyond the scope. 01:10:24
10 THE WITNESS: It means any gift that was 01:10:27
11 either cash or a pledge payment within the time 01:10:30
12 period. 01:10:36
13 BY MS. BREDEHOFT: 01:10:36
14 Q All right. So if somebody pledged 01:10:37
15 3.5 million, you're giving the full value of that 01:10:39
16 in listing it, even though that might be over a 01:10:44
17 period of years? Is that correct? 01:10:47
18 A Correct. 01:10:51
19 MR. MONIZ: Objection. Improper, 01:10:51
20 incomplete hypothetical. 01:10:54
21 BY MS. BREDEHOFT: 01:10:55
22 Q Now, it also says: 01:10:56
23 "Additionally, we extend our 01:10:57
24 gratitude to donors who directed 01:11:00
25 their generosity through one of our 01:11:03

O, R, H
FSPK

1
2
3
4

Associate or Affiliate or allied
groups."
Do you see that?
A Yes.

01:11:06
01:11:09
01:11:10
01:11:11

5
6
7

Q Do you consider the Art of Elysium to be
an Associate, Affiliate, or allied group of
Children's Hospital?

01:11:12
01:11:13
01:11:13

8
9
10
11
12

MR. MONIZ: Objection. Vague and
ambiguous. Calls for a conclusion. The document
speaks for itself. The witness was not designated
to testify on that topic. Calls for an opinion.
Vague. Lacks foundation. Calls for speculation.

01:11:18
01:11:18
01:11:22
01:11:25
01:11:29

13
14
15

THE WITNESS: I'm sorry. I actually
didn't hear the name of the group that you said.
If you can repeat that.

01:11:35
01:11:36
01:11:39

16

BY MS. BREDEHOFT:

01:11:40

17
18

Q Sure. Art of Elysium.
So let me just ask a clean question.

01:11:41
01:11:43

O, R, H
FSPK

19
20
21
22

Does Children's Hospital consider Art of
Elysium -- it's E-L-L-Y-S-E-U-M [sic], I believe --
one of Children's Hospital's associate, affiliate,
or allied groups?

01:11:47
01:11:47
01:11:52
01:11:56

23
24
25

MR. MONIZ: Same objections. Calls for
an opinion. Beyond the scope of the topics for
which this witness can testify based on the

01:12:00
01:12:02
01:12:05

1 designation as person most qualified. 01:12:08

2 Also vague and ambiguous as to what being 01:12:12

3 an Associate, Affiliate, or allied group even 01:12:14

4 means. 01:12:19

O,R,H 5 THE WITNESS: The Associate and 01:12:19
FSPK

6 Affiliate, that particular group that you 01:12:21

7 mentioned, is not part of that. 01:12:23

8 I don't know about the other group. 01:12:26

9 BY MS. BREDEHOFT: 01:12:31

O,R,H 10 Q Allied? You don't know whether the Art 01:12:33
FSPK

11 of Elysium is allied with Children's Hospital; is 01:12:36

12 that correct? 01:12:43

13 MR. MONIZ: Same objections. 01:12:43

O,R,H 14 THE WITNESS: Yeah. I never -- I 01:12:44
FSPK

15 personally have not heard of that group that you 01:12:44

16 mentioned. 01:12:47

17 BY MS. BREDEHOFT: 01:12:48

18 Q Okay. Thank you. 01:12:48

19 And I'm just going to go down here, 01:12:48

20 because I just have this as one page. And maybe 01:12:50

21 that highlighter will work this time. 01:12:54

O,R,H 22 And we see here on the 1 million to 01:12:57
FSPK

23 4,999-, "Ms. Amber Heard." 01:13:00

24 Do you see that? 01:13:07

25 A Yes. 01:13:09

1 Q Okay. And who compiles this Honor Roll 01:13:09
2 on behalf of Children's Hospital? 01:13:12
3 MR. MONIZ: Objection. Relevance. 01:13:15
4 Beyond the scope. 01:13:17
5 THE WITNESS: The donor relations team 01:13:18
6 within the foundation. 01:13:20
7 MS. BREDEHOFT: Okay. Then, I'm going to 01:13:21
8 ask if we can go to Exhibit Number -- I think I'm 01:13:26
9 going to have to go to mine. 01:13:38
10 If we can pull up my Exhibit Number 10, 01:13:40
11 please, and we'll make it Number 20. 01:13:43
12 (Deposition Exhibit 20 was marked 01:13:46
13 for identification.) 01:13:46
14 MS. BREDEHOFT: It's the Honor Roll as 01:13:48
15 well. 01:13:50
16 BY MS. BREDEHOFT: 01:14:03
17 Q And if I can just ask you to turn, for a 01:14:04
18 moment, to this part, where it says "Lifetime 01:14:06
19 Giving." 01:14:09
20 Do you see that? 01:14:10
21 A Yes. 01:14:11
22 Q And it says: 01:14:11
23 "Our lifetime giving lists 01:14:13
24 recognize donors who have made 01:14:16
25 contributions of a million or more, 01:14:18

1 as well as those who have included 01:14:21
2 the hospital in their estate plans 01:14:24
3 or have made planned gift 01:14:27
4 commitments, as of June 1, 2018." 01:14:29
5 Do you see that? 01:14:32
6 A Yes. 01:14:33
7 Q So that would include, for example, if 01:14:34
8 someone had declared that they were leaving a 01:14:37
9 certain amount in their will to Children's 01:14:40
10 Hospital? Would that be correct? 01:14:42
11 MR. MONIZ: Objection. Beyond the scope. 01:14:44
12 The document speaks for itself. Improper, 01:14:46
13 incomplete hypothetical. 01:14:49
14 THE WITNESS: Yes. If somebody made a 01:14:50
15 gift -- a planned gift to their estate, and they 01:14:52
16 had let Children's Hospital Los Angeles know that 01:14:56
17 they had done so, they would be included in that 01:14:58
18 list. 01:15:01
19 BY MS. BREDEHOFT: 01:15:02
20 Q And that would be contingent, presumably, 01:15:03
21 upon their death. So it could be quite some time 01:15:05
22 out before they actually give it, correct? 01:15:09
23 MR. MONIZ: Objection. Lacks foundation. 01:15:11
24 Calls for speculation. Improper, incomplete 01:15:12
25 hypothetical. Relevance. Vague and ambiguous. 01:15:14

1 And the document speaks for itself. 01:15:17

2 THE WITNESS: Correct. It could be a 01:15:20

3 number of years. 01:15:21

4 BY MS. BREDEHOFT: 01:15:24

5 Q Okay. Thank you. 01:15:25

6 And then the part before, "have made 01:15:25

7 planned gift commitments, as of June 1, 2018," does 01:15:29

8 that include pledged gifts that might be over a 01:15:33

9 period of time? 01:15:37

10 MR. MONIZ: Document speaks for itself. 01:15:38

11 Calls for an opinion. 01:15:42

12 THE WITNESS: Correct. 01:15:45

13 BY MS. BREDEHOFT: 01:15:45

14 Q Okay. 01:15:46

15 A Pledged gifts over a period of time. 01:15:46

16 Q Thank you. 01:15:49

17 Then, I'm going to ask you -- I think 01:15:51

18 there was just a misunderstanding or mistake on the 01:15:53

19 testimony earlier on this Honor Roll. 01:15:56

20 If I can direct your attention to the -- 01:15:59

21 it's the 1 million to 499-. And if I can just show 01:16:02

22 you here that we have -- going up just the touch -- 01:16:08

23 "Ms. Amber Heard" there. 01:16:11

24 I think that there was some confusion, 01:16:14

25 when Mr. Moniz -- counsel for Mr. Depp was asking 01:16:15

1 you the question. 01:16:19
2 But Ms. Heard is listed under the 01:16:21
3 1 million to the 4,999- on this one as well, 01:16:24
4 correct? 01:16:28
5 A Correct. 01:16:29
6 Q I think there was just a mistake -- 01:16:29
7 A For the lifetime giving, correct. 01:16:34
8 (Reporter clarification.) 01:16:38
9 MS. BREDEHOFT: All right. I'm going to 01:16:47
10 ask you to go to -- if you can pull up the -- I'm 01:16:48
11 going to just have us pull up -- well, no. 01:16:55
12 Pull up Depp Number 9 -- because it's -- 01:16:59
13 no, no, no, it's not. I've got that wrong. I'll 01:17:00
14 do my 11. 01:17:04
15 Just bring up my 11, please. And I'll 01:17:05
16 make it -- I think we made that -- are we on 20 01:17:07
17 now, or 21? 01:17:11
18 THE REMOTE TECHNICIAN: 21. 01:17:15
19 MS. BREDEHOFT: Okay. Great. 01:17:17
20 (Deposition Exhibit 21 was marked 01:17:18
21 for identification.) 01:17:18
22 BY MS. BREDEHOFT: 01:17:25
23 Q I'm going to ask you to take a look at 01:17:26
24 this letter again. This was sent out by Mr. White, 01:17:28
25 I think by you, on June 14, 2019. 01:17:31

1 Do you see that? 01:17:35

2 A Yes. 01:17:35

O,R, 3 Q Were you aware that Mr. Depp had filed a 01:17:36
FSPK

4 lawsuit against Amber Heard seeking \$50 million on 01:17:40

5 March 1, 2019, before this letter was sent? 01:17:46

6 MR. MONIZ: Objection. Relevance. Lacks 01:17:51

7 foundation. 01:17:54

8 THE WITNESS: No, I was not aware. 01:17:59

9 MS. BREDEHOFT: And if we can then pull 01:18:02

10 up my Exhibit Number 12, and we'll make that 22. 01:18:05

11 (Deposition Exhibit 22 was marked 01:18:10

12 for identification.) 01:18:10

13 BY MS. BREDEHOFT: 01:18:33

O,R, 14 Q And I'm going to just ask you to take a 01:18:34
FSPK

15 look at this one. It also has a date in June of 01:18:36

16 2019. And I think you indicated that you did not 01:18:40

17 hear a response. 01:18:42

18 Again, were you aware when you sent this 01:18:43

19 letter that Mr. Depp had filed suit against Amber 01:18:46

20 Heard seeking \$50 million in damages? 01:18:49

21 MR. MONIZ: Same objections. Relevance. 01:18:54

22 Lacks foundation. 01:18:56

23 THE WITNESS: No. I was not aware of 01:18:57

24 that suit. 01:18:59

25

1 BY MS. BREDEHOFT: 01:19:00

O,R,
FSPK

2 Q And do you know whether that lawsuit has 01:19:01

3 concluded? 01:19:03

4 MR. MONIZ: Same objections. Relevance. 01:19:06

5 Calls for legal opinion. Way beyond the scope. 01:19:08

6 THE WITNESS: I'm not aware. 01:19:16

7 BY MS. BREDEHOFT: 01:19:17

8 Q Well, I'll tell you what. Since we're 01:19:18

9 taking your deposition, there's a pretty good 01:19:20

10 chance it's still ongoing, but that's my point. 01:19:23

11 Are you aware -- 01:19:25

12 MR. BLESSEY: Counsel -- Elaine, we're 01:19:26

13 starting to get beyond the scope of this -- 01:19:28

14 MS. BREDEHOFT: Yeah. I'm almost done. 01:19:32

15 MR. BLESSEY: Go ahead. 01:19:34

16 MS. BREDEHOFT: I'm almost done. 01:19:35

17 MR. BLESSEY: Okay. 01:19:36

18 MS. BREDEHOFT: I'm just trying to make 01:19:36

19 the points here. 01:19:38

20 BY MS. BREDEHOFT: 01:19:39

O,R,
FSPK,
H

21 Q Are you aware that Ms. Heard's counsel 01:19:39

22 has made representations on the record that she 01:19:42

23 fully intends to meet her pledge to Children's 01:19:45

24 Hospital once she's able to afford it? 01:19:51

25 MR. MONIZ: Objection. Relevance. 01:19:56

Transcript of Candie Davidson-Goldbronn, Designated Representative
March 30, 2021

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1 Beyond the scope. Lacks foundation. Calls for 01:19:58
2 speculation. Hearsay. 01:20:01
3 Go ahead. 01:20:05
4 MR. BLESSEY: I think the question is 01:20:07
5 relevant to the scope of this deposition in terms 01:20:09
6 of communication. 01:20:12
7 So you can answer that question. 01:20:13
8 O, R, THE WITNESS: No. I was not aware of 01:20:14
9 FSPK, H that. 01:20:17
10 MS. BREDEHOFT: Thank you. 01:20:20
11 BY MS. BREDEHOFT: 01:20:26
12 O, R, Q Are you aware of any communications by 01:20:27
13 FSPK, H Amber Heard with Children's Hospital that she did 01:20:28
14 not intend to honor the \$3.5 million pledge? 01:20:31
15 A No. I'm not aware of communications from 01:20:40
16 her about that. 01:20:43
17 Q Now, does Children's Hospital have any 01:20:48
18 knowledge whatsoever about whether Mr. Depp 01:20:52
19 committed domestic violence against Amber Heard? 01:20:57
20 MR. MONIZ: Objection. Beyond the scope. 01:21:03
21 MR. BLESSEY: I will join. 01:21:04
22 MR. MONIZ: Completely -- completely 01:21:06
23 beyond the scope. Relevance. Lacks foundation. 01:21:06
24 Calls for speculation. 01:21:09
25 MR. BLESSEY: Do you want to withdraw 01:21:12

Transcript of Candie Davidson-Goldbronn, Designated Representative

March 30, 2021

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1	that question, Elaine?	01:21:13
2	MS. BREDEHOFT: Well, here is my -- the	01:21:15
3	point I'm making, Mr. Blessey, is I think this	01:21:17
4	whole deposition is not relevant.	01:21:20
5	But, in Virginia, we don't make relevance	01:21:21
6	objections; we just establish it. So I'm trying to	01:21:24
7	make the point here that it has nothing to do with	01:21:27
8	this case.	01:21:31
9	I'm not the one who noticed this	01:21:31
10	deposition. I'm not the one who issued these	01:21:35
11	subpoenas. I'm just trying to make the point.	01:21:37
12	And so I would appreciate it if you --	01:21:40
13	MR. BLESSEY: I hear you.	01:21:42
14	MS. BREDEHOFT: I would appreciate it if	01:21:43
15	you could just --	01:21:43
16	MR. BLESSEY: I hear you. I'm going	01:21:43
17	to -- I'll let her answer, but the objection is	01:21:43
18	well beyond the designated scope of her deposition.	01:21:46
19	You can answer.	01:21:50
20	THE WITNESS: Sorry. With everything,	01:21:52
21	could you just repeat the question for me.	01:21:53
22	MS. BREDEHOFT: Can you read that back,	01:21:56
23	Lori, just to make it clean.	01:21:58
24	(Record read as follows: "Q. Does	01:22:00
25	Children's Hospital have any	01:22:00

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1	knowledge whatsoever about whether	01:22:00
2	Mr. Depp committed domestic violence	01:22:00
3	against Amber Heard?")	01:22:00
4	MR. MONIZ: Same objections. Also vague	01:22:16
5	and ambiguous as to "any knowledge whatsoever."	01:22:18
6	MR. BLESSEY: Calls for a legal	01:22:21
7	conclusion.	01:22:22
8	Go ahead.	01:22:23
9	MR. MONIZ: Join.	01:22:24
O, IU, OQ, R	10 THE WITNESS: No knowledge. No	01:22:25
	11 knowledge.	01:22:26
	12 BY MS. BREDEHOFT:	01:22:27
	13 Q All right. Do you have -- does	01:22:29
	14 Children's Hospital -- let me phrase it this way:	01:22:30
	15 Has Children's Hospital been contacted by anyone --	01:22:34
	16 by Mr. Depp or anyone on Mr. Depp's behalf,	01:22:41
	17 relating to these pledges -- the pledge by	01:22:44
	18 Ms. Heard, other than the letter that we saw from	01:22:50
	19 Mr. White, that you're aware of?	01:22:54
	20 MR. MONIZ: Objection. Vague and	01:22:58
	21 ambiguous, including as to the word "contact." The	01:22:58
	22 CHLA was subpoenaed. Relevance.	01:23:03
	23 But go ahead.	01:23:15
	24 THE WITNESS: We did receive the subpoena	01:23:16
	25 to provide documentation.	01:23:17

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1	BY MS. BREDEHOFT:	01:23:19
2	Q Was that subpoena issued by -- in this	01:23:20
3	case, or was it issued based on --	01:23:21
4	A It was issued -- yeah, it was issued for	01:23:25
5	this case.	01:23:27
6	MR. MONIZ: Objection. Beyond the scope	01:23:28
7	of -- and also calls for a legal conclusion. You	01:23:30
8	know, the subpoena speaks for itself.	01:23:35
9	BY MS. BREDEHOFT:	01:23:40
10	Q Has Children's Hospital been contacted at	01:23:41
11	any time on behalf of Mr. Depp's counsel from the	01:23:42
12	UK?	01:23:46
13	MR. MONIZ: On any topic?	01:23:52
14	Objection. Overbroad. Vague --	01:23:54
15	MS. BREDEHOFT: Yeah. Good point. I'll	01:23:57
16	ask that clean.	01:23:58
17	BY MS. BREDEHOFT:	01:23:59
18	Q Has Children's Hospital been contacted at	01:24:02
19	any point by Mr. Depp or his counsel or	01:24:03
20	representatives from the UK, in connection with his	01:24:06
21	litigation in the UK relating to Ms. Heard's pledge	01:24:08
22	and donations to Children's Hospital?	01:24:11
23	MR. MONIZ: Okay. This is beyond the	01:24:14
24	scope of the topics for which this witness was	01:24:16
25	designated to testify. So beyond the scope.	01:24:20

1 Relevance. Lacks foundation. Calls for 01:24:22
2 speculation. 01:24:24
3 And it arguably calls for a legal 01:24:25
4 conclusion as to the purpose for which anybody was 01:24:28
5 or was not contacting CHLA. 01:24:30
6 THE WITNESS: I'm not aware of any. 01:24:36
7 MS. BREDEHOFT: Thank you. I only have 01:24:39
8 three more questions. 01:24:41
9 BY MS. BREDEHOFT: 01:24:41
10 Q Do you have any information, as you sit 01:24:42
11 here today, that Amber Heard does not plan to 01:24:43
12 donate the full 3.5 million she pledged to 01:24:49
13 Children's Hospital? 01:24:53
14 MR. MONIZ: Objection. Beyond the scope. 01:24:54
15 Calls for speculation. Lacks foundation. The 01:24:55
16 witness was not designated to testify as to 01:24:58
17 Ms. Heard's motives or intentions. Argumentative. 01:25:01
18 Relevance. 01:25:04
19 MR. BLESSEY: Well, it has been asked and 01:25:05
20 answered. 01:25:06
21 You can answer again. 01:25:07
22 THE WITNESS: Yeah. There has not been 01:25:08
23 O, IU, any contact with her, and we have no knowledge of 01:25:09
24 QQ, R, it. 01:25:13
25 FSPK

1 BY MS. BREDEHOFT: 01:25:13

2 Q Okay. But so I just -- maybe I asked 01:25:14

3 that badly, so let me ask it a little differently. 01:25:16

R, 4 Do you have any information, one way or 01:25:20
FSPK

5 the other, whether Ms. Heard plans to donate the 01:25:22

6 full 3.5 million she pledged to Children's 01:25:25

7 Hospital? 01:25:28

8 MR. MONIZ: Same objections. Calls for 01:25:31

9 speculation. 01:25:33

R, 10 THE WITNESS: I'm not aware of any. 01:25:34
FSPK

11 BY MS. BREDEHOFT: 01:25:36

12 Q Thank you. 01:25:37

13 And my last question is: Has Amber 01:25:36

R, 14 Heard's pledge of the \$3.5 million to Children's 01:25:39
FSPK

15 Hospital expired, to your knowledge? 01:25:45

16 MR. MONIZ: Objection. Vague and 01:25:47

17 ambiguous, including as to the term "expired." 01:25:48

18 Calls for an opinion. Calls for a conclusion. 01:25:51

19 Beyond the scope. Argumentative. Calls for 01:25:53

20 speculation. 01:25:58

21 Go ahead. 01:25:58

R, 22 THE WITNESS: Not that I'm aware of, no. 01:26:03
FSPK

23 It has not expired. 01:26:05

24 MS. BREDEHOFT: Thank you. I have no 01:26:06

25 further questions. Thank you very much. I 01:26:07

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1	appreciate the time.	01:26:10
2	MR. MONIZ: All right. Well, I don't	01:26:14
3	think I have any further questions either, based	01:26:15
4	on -- based on Elaine's cross.	01:26:18
5	So I want to thank you again,	01:26:20
6	Ms. Goldbronn, for appearing here today.	01:26:23
7	Just so you know, you'll be given an	01:26:27
8	opportunity to review the deposition transcript,	01:26:29
9	once it's been prepared, and to make any	01:26:31
10	corrections that you want to make.	01:26:34
11	How have we been handling -- how have we	01:26:37
12	been handling the transcripts up until now, Elaine?	01:26:39
13	Are we doing the typical California stipulations,	01:26:43
14	or...	01:26:45
15	(Short discussion off the record.)	01:26:57
16	MS. BREDEHOFT: So, Mr. Blessey, maybe	01:27:04
17	the best way I can -- since this is a Virginia	01:27:04
18	procedure, Mr. Blessey, let me -- I appreciate Sam	01:27:04
19	jumping in with this.	01:27:04
20	The way that it works is the transcript	01:27:04
21	will be typed up. We'll be given copies. If	01:27:08
22	you -- if you want to read the copy -- if	01:27:12
23	Ms. Davidson-Goldbronn wants to read and then sign,	01:27:16
24	she can do that. She'll have 30 days from when she	01:27:21
25	receives the transcript.	01:27:24

1	It gives her the opportunity, if she	01:27:25
2	wants to correct anything -- you know, the types of	01:27:26
3	examples of that are typographical errors, spelling	01:27:29
4	errors, you know, maybe if there was a word missing	01:27:33
5	that might have changed something, that kind of	01:27:35
6	thing.	01:27:38
7	And she can certainly do that. And if	01:27:38
8	you want to do that, we'll certainly make	01:27:41
9	arrangements to get you a copy of the transcript.	01:27:44
10	If Ms. Davidson-Goldbronn would like to	01:27:47
11	waive her signature and says I think the court	01:27:49
12	reporter is going to do fine on this one, she also	01:27:52
13	has that option.	01:27:55
14	But it has to be stated on the record for	01:27:56
15	us, before you leave.	01:27:58
16	MR. BLESSEY: All right.	01:28:01
17	Counsel, so let me state it on the	01:28:02
18	record. I would prefer that a deposition	01:28:04
19	transcript be sent to me, and I will see to it that	01:28:06
20	the witness has the opportunity to read, review it,	01:28:09
21	make any changes, under penalty of perjury. And	01:28:12
22	then I will notify all counsel of her changes, if	01:28:15
23	that's okay with all of you.	01:28:19
24	MS. BREDEHOFT: Yes. There will be an	01:28:22
25	errata sheet, so you can send it in. That would be	01:28:23

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1	wonderful.	01:28:27
2	And I'll coordinate with you. I may need	01:28:28
3	to get your email address. I'm not sure I have it,	01:28:30
4	but...	01:28:32
5	MR. BLESSEY: Okay. That's fine. I can	01:28:32
6	give it to you. But it's also -- why don't I give	01:28:32
7	it to you right now, if that's okay with everybody.	01:28:35
8	MS. BREDEHOFT: Okay.	01:28:38
9	MR. BLESSEY: It's RBlessey --	01:28:38
10	B-L-E-S-S-E-Y -- @RM, as in Mary, BLawyer.com.	01:28:38
11	RBlessey@RMBLawyer.com.	01:28:49
12	MS. BREDEHOFT: Great. Thank you so	01:28:58
13	much. All right. That's wonderful.	01:28:59
14	THE VIDEOGRAPHER: This marks the end of	01:29:03
15	the deposition of Candie Davidson-Goldbronn as a	01:29:04
16	PMQ at Children's Hospital Los Angeles. We're	01:29:08
17	going off the record at 13:29 Pacific.	01:29:11
18	MS. BREDEHOFT: Lori, we have a standing	01:29:19
19	order; I think, so does the other side. So we have	01:29:20
20	a standing order, so we're good.	01:29:26
21	THE STENOGRAPHER: Okay. So no expedites	01:29:29
22	or roughs needed, correct?	01:29:30
23	MS. BREDEHOFT: Not for us.	01:29:32
24	MR. MONIZ: I don't think we need an	01:29:33
25	expedite. Unless Camille unmutes and tells me I'm	01:29:36

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1	wrong, no need.	01:29:41
2	MS. VASQUEZ: Sam, you're not wrong.	01:29:45
3	MR. MONIZ: Okay.	01:29:46
4	THE STENOGRAPHER: Okay. Thank you.	01:29:46
5	(Time noted 1:29 p.m.)	01:29:47
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1 STATE OF CALIFORNIA)
2)
3)

4 CERTIFICATE OF REPORTER

5 I, LORI STOKES, do hereby certify that the
6 witness in the foregoing deposition was by me duly
7 affirmed to tell the truth, the whole truth and
8 nothing but the truth in the within-entitled cause;
9 that said deposition was taken at the time and
10 place therein stated; that the testimony of said
11 witness was reported by me and was thereafter
12 transcribed under my direction and supervision;
13 that the foregoing is a full, complete and true
14 record of said testimony; that the witness was
15 given an opportunity to read and, if necessary,
16 correct said deposition and to subscribe the same.

17 I further certify that I am not of counsel or
18 attorney for either or any of the parties in the
19 foregoing deposition and caption named, or in any
20 way interested in the outcome of the cause named in
21 said caption.

22 IN WITNESS WHEREOF, I have hereunto set my
23 hand this 5th day of April, 2021.

24 

25 LORI STOKES, CSR No. 12732