

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

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

Case No. BC680066

Plaintiffs,

vs.

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

Defendants.

AND RELATED CROSS-ACTIONS.

VIDEOTAPED DEPOSITION OF CORNELIUS HARRELL
LOS ANGELES, CALIFORNIA
THURSDAY, JANUARY 31, 2019

REPORTED BY:
SHAWNA HIGGINS
CSR NO. 10646

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2 FOR THE COUNTY OF LOS ANGELES
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4 JOHN C. DEPP, II, SCARAMANGA)
BROS., INC., A CALIFORNIA)
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6 INFINITUM NIHIL, A CALIFORNIA)
CORPORATION,)
7)
Plaintiff,)
8)
vs.)
9)
BLOOM HERGOTT DIEMER ROSENTHAL LA)
10 VIOLETTE FELDMAN SCHENKMAN &)
GOODMAN, LLP, JACOB A. BLOOM, AND)
11 DOES 1-30,)
))
12 Defendants.)
))
13 AND RELATED CROSS-ACTIONS.)
))
14)
15)
16)
17 DEPOSITION OF CORNELIUS HARRELL, at South Grand
18 Avenue, Suite 2900, Los Angeles, California, beginning
19 at 1:11 p.m., ending at 2:14 p.m., on Thursday,
20 January 31, 2019, before Shawna Higgins, Certified
21 Shorthand Reporter No. 10646.
22)
23)
24)
25)

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1 APPEARANCES:
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15 ALSO PRESENT:
16 STEVEN TOGAMI - VIDEOGRAPHER
17
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9 INFORMATION REQUESTED
10 (NONE)
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17 QUESTIONS INSTRUCTED NOT TO ANSWER
18 (NONE)
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1 DEPOSITION EXHIBITS

2

3 EXHIBIT NUMBER DESCRIPTION PAGE

4 (NONE)

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1 in the outcome.

2 If there are any objections to proceeding,

3 please state them at the time of your appearance.

4 At this time will counsel and all present

5 please state their appearances and affiliations for

6 the record.

7 MS. BILES: Brit Biles, Stein Mitchell Beato &

8 Missner for Mr. Depp and his companies.

9 MR. WRENSHALL: Mathew Wrenshall, Reed Smith LLP

10 for Bloom Hergott and Jacob A. Bloom.

11 MR. WALDMAN: Adam Waldman Endeavor Law Firm for

12 Johnny Depp and his companies.

13 THE WITNESS: Cornelius Harrell, Eastern

14 Columbia concierge.

15 THE VIDEOGRAPHER: Thank you. Could we please

16 have the oath.

17

18 CORNELIUS HARRELL,

19 having been first duly sworn, testified as follows:

20

21 EXAMINATION

22

23 BY MS. BILES:

24 Q. Mr. Harrell, my name is Brit Biles and I

25 represent Mr. Depp and his production companies,

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1 LOS ANGELES, CALIFORNIA, THURSDAY, JANUARY 31, 2019

2

3 THE VIDEOGRAPHER: Good afternoon. We are on

4 the record at 1:11 p.m. on January 31, 2019. Please

5 note that the microphones are sensitive and may pick

6 up whispers, private conversations, and cellular

7 interference. Audio and video recording will

8 continue to take place unless all parties agree to

9 go off the record.

10 This is media unit number one of the video

11 recorded deposition of Cornelius Harrell taken by

12 counsel for the plaintiffs and cross-defendants in

13 the matter of John C. Depp, II, et al., versus Bloom

14 Hergott Diemer, et al., and related cross-complaint.

15 Filed in the Superior Court of the State of

16 California for the County of Los Angeles, case

17 number BC680066.

18 This deposition is being held at Reed Smith

19 located at 355 South Grand Avenue, Los Angeles,

20 California 90071.

21 My name is Steven Togami from the firm

22 Veritext Legal Solutions and I am the videographer.

23 The court reporter is Shawna Higgins from the firm

24 Veritext Legal Solutions. I am not related to any

25 party in this action nor am I financially interested

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1 some of his other business entities. You previously

2 testified in deposition related to some interactions

3 that you had with Amber Heard in 2016, so today I

4 would just want to follow up with you on some of

5 those interactions and ask you some more questions.

6 But before we do that I want to go through some

7 basics of a deposition. You have been deposed

8 before, but I just want to go over them again.

9 The court reporter is taking down

10 everything that anyone says and she can't take down

11 when people are talking over each other, so it's

12 important that I let you finish before I jump in

13 with a question and you let me finish my questions

14 before you jump in with an answer. When people are

15 just speaking, sometimes they finish each other's

16 sentences and things like that, but we have to be

17 artificial and stilted here where I finish speaking,

18 then you answer, then you finish speaking and then I

19 talk again. So will you do your best to do that

20 today?

21 A. Absolutely.

22 Q. And if you don't understand a question,

23 please let me know. I will do my best to rephrase

24 it in a way that's more understandable. But if you

25 answer my questions, I'm going to assume that you

Page 10

1 understood them.

2 Is that fair?

3 A. Yes.

4 Q. And if you need to take a break at any

5 time, just let us know and we can go off the record

6 and do that. I just ask that if I have a question

7 pending that you go ahead and answer before we go

8 off the record for a break.

9 A. Got it.

10 Q. Is that good?

11 A. Yes.

12 Q. Is there anything that would prevent you

13 from giving full and complete testimony today?

14 A. No.

15 Q. Okay. Well, let's get started then.

16 When you introduced yourself on the record

17 you said that you were a concierge at the Eastern

18 Columbia Building. Is that your occupation?

19 A. Yes.

20 Q. Okay. Where is the Eastern Columbia

21 Building?

22 A. 849 South Broadway.

23 Q. And what are your job responsibilities as

24 concierge at the Eastern Columbia Building?

25 A. At the Eastern Columbia our

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1 responsibilities are to ensure that all of the

2 tenants have what they need, whether that be

3 packages, whether that be guests letting -- being

4 checked in, as well as just the security operations

5 of the building.

6 Q. And how long have you been a concierge at

7 the Eastern Columbia Building?

8 A. Currently two and a half years.

9 Q. So did you start working there

10 approximately 2016?

11 A. Permanently, yes. I helped out before

12 prior, 2015, but I was assigned to a different

13 building at that moment, so I helped out prior to

14 2016, but I became permanently there in 2016.

15 Q. Okay. What month did you become

16 permanently stationed at Eastern Columbia, if you

17 recall?

18 A. If I were to give you a rough estimate

19 would that be okay?

20 Q. Sure.

21 A. Maybe in March.

22 Q. Of 2016?

23 A. Yes.

24 Q. Okay. You previously testified about an

25 interaction that you had with Amber Heard on May 21,

Page 12

1 2016. By May 21, 2016 were you permanently

2 stationed at Eastern Columbia?

3 A. Yes.

4 Q. Okay. And do you know Amber Heard?

5 A. When you say "know," can you clarify?

6 Q. Sure. Do you recognize her when you see

7 her?

8 A. Yes.

9 Q. Okay. And how did you come to recognize

10 her when you see her?

11 A. I met her at the Eastern Columbia Building.

12 We had interaction and I was able to identify her as

13 a resident there and in doing my job I serviced her

14 a few different times.

15 Q. When you say you "serviced her a few

16 different times" in your job, can you explain what

17 you mean by that?

18 A. We had many interactions in which I -- she

19 came down to get packages, I escorted her into the

20 lobby, we just had small talk just to get the things

21 that she needed from me.

22 Q. Was she -- sorry, go ahead.

23 A. Yeah, Just to get the things that she

24 needed from me kind of squared away.

25 Q. Was Ms. Heard a resident of the Eastern

Page 13

1 Columbia Building in May of 2016 to your knowledge?

2 A. Yes.

3 Q. Okay. Did you ever have any interactions

4 with Mr. Johnny Depp?

5 A. I did not.

6 Q. Okay. Let's focus in on the interaction

7 that you previously described having with Ms. Heard

8 on May 22, 2016. You previously testified about

9 providing a package to Ms. Heard on that date. Can

10 you tell us about your interaction with Ms. Heard on

11 May 22nd?

12 A. Yes. Ms. Heard and I, we talked, she

13 caught me at the front desk as I was sitting down

14 and she said that she had a package that she had

15 needed to pick up. She and I had dialogue that was

16 exchanged and she said it was some wine that she was

17 looking for, because I let her know there may be

18 more packages than just one. We walked over to the

19 package room and we were able to identify where her

20 packages went and she kind of picked out a couple.

21 There were a few others in there. She picked out

22 one that she wanted and we just exchanged some

23 dialogue when she had her dog and, yeah, that was

24 it. We walked to the elevator, I buzzed her button

25 with her and we kind of went from there.

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1 Q. Approximately what time of day was it?
2 A. I work at Eastern Columbia around -- the
3 only shifts I work are Sundays from 8:00 to 4:00
4 with the exception I believe of a couple weeks in
5 May that I worked a couple other shifts. I would
6 say that that was probably around the noon to 3:00
7 hour if I were to range in it.
8 Q. And when you were interacting with
9 Ms. Heard what did she look like?
10 A. Ms. Heard looked like a beautiful girl. It
11 was one of the few times that I got to interact with
12 her and we actually talked a little bit more than we
13 normally did. I can't remember if it was prior to
14 that or after that where she needed a jacket
15 dry-cleaned and it was like a really big deal for
16 her and I remember us either talking about it then
17 or bringing it back up at that interaction. So
18 overall seeing her was kind of refreshing. And she
19 just, again, physical appearance I just feel like
20 she's a beautiful girl and she was kind of in like a
21 sun outfit and I just kind of complimented her style
22 at that time and we just kind of small talked which
23 led me into getting her package.
24 Q. Okay. When you say that she looked like a
25 beautiful girl, did she have on makeup?

Page 15

1 A. If she had makeup it was very light because
2 she was very refreshed. It didn't look like she had
3 like a lot of makeup on. It didn't look like she
4 was going anywhere. So I have a lot of girlfriends
5 who do wear makeup. I would say she had bare
6 minimum because she was living in her everyday life.
7 Q. Okay. Did she appear to you to have any
8 injuries to her face on May 22, 2016?
9 A. She did not.
10 Q. Okay.
11 A. And that was one of the first times I seen
12 her like physically other than cameras and one of
13 the few times and I just remember staring at her
14 kind of being like, wow, this girl is beautiful.
15 And then I did have the interaction of talking to
16 her and I was obviously observing her because she
17 was radiant in the way she looked and she had like a
18 summer outfit on and, yeah.
19 Q. Okay. So it's fair to say you didn't see
20 any bruises on Ms. Heard's face on May 22, 2016?
21 A. That is correct.
22 Q. What about any cuts or scratches?
23 A. I did not see any of that either.
24 Q. Okay. Any swelling on her face on that
25 date?

Page 16

1 A. No.
2 Q. Okay. Did anything appear out of the
3 ordinary about Ms. Heard's face on May 22, 2016?
4 A. It did not.
5 Q. Okay. We actually have some surveillance
6 video from the Eastern Columbia Building that I
7 believe was captured on that date and I want to take
8 a look at those, but before that, can you explain
9 your understanding of the surveillance system at the
10 Eastern Columbia Building?
11 A. Yes. The surveillance system at the
12 Eastern Columbia Building allows us to have eyes
13 everywhere, analyze what we could do better and
14 analyze any threats to the residents' security.
15 With that being said, we have a lot of cameras that
16 show different things in the package room, just
17 interactions overall, as well as ensuring that
18 things are getting distributed appropriately. For
19 example, if a resident says they came down and
20 picked up a package, we can use that camera footage
21 to see if they indeed came down and picked up that
22 package.
23 Q. When you're on your job at the Eastern
24 Columbia Building is it your responsibility to
25 monitor the camera footage?

Page 17

1 A. Monitor the camera footage in what way?
2 Q. Do you see it, the footage as it's being
3 recorded in real time?
4 A. Yes.
5 Q. Okay. And where do you see that?
6 A. If sitting at the desk, we see the cameras
7 in real time to the right.
8 Q. Okay. And are they displayed somewhere,
9 your desk where you're sitting?
10 A. Yes, we have monitors; two of them that
11 show us every angle of the building in the most
12 accurate way so we can kind of see threats or see
13 problems that may occur.
14 Q. Okay. And where are you physically
15 stationed when you're in the Eastern Columbia
16 Building?
17 A. We have a front desk and it is I would say
18 200 feet from the door.
19 Q. Is that where you sit when you're working
20 there?
21 A. Yes.
22 Q. Okay. Do you ever leave the front desk for
23 anything?
24 A. Yes.
25 Q. Okay. Can you give me some examples of

Page 18

1 when you would leave the front desk?

2 A. We would leave the front desk to go to the

3 package room to take packages for our residents, we

4 would leave the front desk to accept packages, we

5 would leave the front desk to identify problems that

6 we'd seen in the cameras, we would also leave the

7 front desk if anyone needed some help or any

8 explanations, we would leave the front desk

9 ultimately to provide better service for the

10 residents that live in the building.

11 Q. And when you say "we" are you talking about

12 yourself personally?

13 A. The concierge team.

14 Q. Okay. Who is on the concierge team?

15 A. Currently or in that time? It's changed.

16 Q. In that time.

17 A. In that time we had, we had myself. We had

18 someone named Michael, Michael Wiener I believe his

19 last name is. We had someone named King Joe. We

20 have Trinity Esparza, she's the CEO of the company.

21 And then we had a couple part-timers at that time.

22 And Alex as well.

23 Q. Who is Alex?

24 A. Alex is the Monday through Friday lead.

25 His shift is the bottom half, so Trinity would have

Page 19

1 the morning shift and he would have the night shift.

2 Q. Okay. Is Trinity -- you said she was the

3 CEO. Is she your boss?

4 A. Yes.

5 Q. Okay. Let's take a look at some security

6 footage.

7 MR. WRENSHALL: What exhibit is this?

8 MS. BILES: This is 204-G.

9 BY MS. BILES:

10 Q. What is depicted in this surveillance

11 video?

12 A. In that video, it is the elevator.

13 Q. Which elevator?

14 A. That is the -- only one elevator goes to

15 the penthouse level, so depending on where you're

16 looking at, it can be elevator one or elevator

17 three.

18 Q. Okay. And what date was this footage shot?

19 Can you tell by the video?

20 A. May 22, 2016.

21 Q. Is that the same day that you interacted

22 with Ms. Heard that you previously described?

23 A. I believe so.

24 Q. Okay. Let me back up so you can see this

25 person again on the video, getting on the elevator I

Page 20

1 mean.

2 Take a look at the person who gets on this

3 elevator and let me know if that's someone you

4 recognize.

5 A. Yes.

6 Q. Who is that?

7 A. That's Amber Heard.

8 Q. Okay. Let's see. Where is she getting on

9 the elevator?

10 A. Penthouse level, which is the level she

11 lives -- at that time she lived in.

12 Q. Okay.

13 A. To my knowledge.

14 Q. Approximately what time is this? Can you

15 tell from the video?

16 A. It looks like it's 1:06.

17 Q. Is that approximately the same period of

18 time when you interacted with Ms. Heard about the

19 package?

20 A. (No response.)

21 Q. I believe you previously testified it was

22 between noon and 3:00?

23 A. Yes.

24 Q. Where did Ms. Heard just get off of this

25 elevator at?

Page 21

1 A. That's level one. That's where I would be.

2 Q. Okay. Let's take a look at another video.

3 Let's look at video number four which was previously

4 marked as 204-I.

5 What is this footage of?

6 A. That footage is of the hall leading to the

7 dog run, package room, bathroom, manager's office.

8 Q. Okay. And what is the date of this

9 footage?

10 A. May 22nd, 1:07.

11 Q. Okay. There will be some people -- do you

12 recognize who that was? Let me back up. It's right

13 at the bottom of the screen.

14 A. Yes, that looks like me.

15 Q. Who is that with you?

16 A. That's Amber.

17 Q. Where were you and Ms. Heard going in this

18 video?

19 A. That is the package room.

20 Q. Okay. Does this -- is it your belief that

21 this footage was shot on the surveillance cameras

22 when you were going with Ms. Heard to pick up the

23 package she requested?

24 A. I'm sorry, I don't understand the question.

25 Q. Sure. You previously testified that you

Page 22

1 worked with Ms. Heard to pick up a package on
2 May 22, 2016 sometime in the afternoon between 12:00
3 and 3:00. This is footage of you and Ms. Heard
4 going to a package room. Is it your understanding
5 by looking at this surveillance video that this is a
6 recording of the interaction you previously
7 described?
8 A. Yes.
9 Q. Okay. How big is the package room?
10 A. Fairly small. I would say it's no bigger
11 than a walk-in closet.
12 Q. Did Ms. Heard go into the package room with
13 you?
14 A. She did peek her head into the package room
15 with me because we identified like her area in the
16 package room which is the PH level and, again, I
17 believe she had more than one package and she was
18 looking for one specific package.
19 Q. Do you recall which specific package?
20 A. Wine.
21 Q. Okay. Is that her leaving with the
22 package?
23 A. Yes.
24 Q. Okay. Now I want to go to what has
25 previously been marked as 204-H.

Page 23

1 What is this surveillance footage of?
2 A. That's surveillance of the mezzanine level
3 and that leads to the mailbox access and the parking
4 structure elevator that the residents park in.
5 Q. Okay. Who is that? Let me back up.
6 A. That looks like Amber.
7 Q. Where is she going there?
8 A. She's going into the parking structure.
9 That door leads to the parking garage.
10 Q. Okay. You had mentioned earlier that one
11 of your responsibilities as concierge involves
12 interacting with guests or assisting residents with
13 guests. Can you describe what you do in relation to
14 guests?
15 A. If any of the residents have guests, I
16 would check them in and ensure that they are
17 expected guests, so we would call the resident and
18 ensure that they have access up.
19 Q. Did you ever check in any guests for
20 Ms. Heard?
21 A. Yes.
22 Q. When was that? Do you recall a specific
23 time you checked in a guest for Ms. Heard?
24 A. Specific time, no. Specific people, yes.
25 Q. Okay. Tell us about that. Who were some

Page 24

1 specific people you recall checking in for
2 Ms. Heard?
3 A. I have checked in her sister. I have
4 checked in Kara Devine, Devine, one of her friends,
5 amongst a couple other people who may work with her
6 or for her sister.
7 Q. Okay. In your prior deposition you
8 testified about seeing Ms. Heard on the surveillance
9 videos with a male guest.
10 Do you recall that?
11 A. Do I recall saying that or do I recall
12 seeing it?
13 Q. Let's start with saying that. Do you
14 recall saying it?
15 A. No, I don't actually.
16 Q. Okay. Well, do you recall seeing her with
17 a male guest?
18 A. Yes.
19 Q. Okay. Do you know who that male guest was?
20 A. No.
21 Q. Okay. I have some surveillance videos from
22 that date so we can see if that's the person you
23 recall seeing her with. Okay. This is 204-L.
24 What is the date of this surveillance
25 video?

Page 25

1 A. May 22, 2016.
2 Q. And what time is it?
3 A. It looks like it's 10:56 p.m.
4 Q. Okay. Do you recognize the person who is
5 getting on the elevator?
6 A. Yes, it looks like Amber.
7 Q. Okay. Where is Ms. Heard going?
8 A. That is the mezzanine level.
9 Q. Okay. What is on the mezzanine level?
10 A. That will be -- she turned right, which
11 would be the mail room and/or the access to the
12 parking structure.
13 Q. Okay. She didn't appear to be wearing
14 shoes. Was it typical for her to walk around the
15 building without shoes on?
16 A. Not that I recall. However, I do know that
17 a lot of residents do not -- do walk around the
18 building without shoes on.
19 Q. Okay. Who is that?
20 A. That looks like Amber.
21 Q. Is this the male guest that you described
22 seeing Ms. Heard with? I can back it up so you can
23 get a look at him.
24 Is that the guest you described in your
25 prior testimony?

Page 26

1 A. No. I don't, I don't recall this
2 interaction.
3 Q. Okay. Do you recall seeing this individual
4 with Ms. Heard at any other time?
5 A. I can't really see his face from this
6 footage. I'm trying to kind of like grasp it and
7 put pieces together, but I can't really -- and if
8 I -- I don't believe this is the shift I was
9 working, so I probably wasn't here. I would have
10 known if I was here during this time. However, I
11 did see her with many male guests and friends, so I
12 don't recognize him. I'm sorry.
13 Q. You said that you didn't believe you were
14 working at this time. What time is captured in this
15 video?
16 A. Looks like it's 10:57 p.m.
17 Q. On what date?
18 A. May 22, 2016.
19 Q. Okay. At some point in time did you come
20 to learn that police had been called to the
21 penthouse unit that Ms. Heard and Mr. Depp shared in
22 the Eastern Columbia Building on May 21, 2016?
23 A. I did.
24 Q. Okay. How did you come to learn that?
25 A. My next shift, TMZ or some photographers or

Page 27

1 something was outside of the building and I had no
2 idea. And then one of the residents came up to me
3 and told me.
4 Q. Who was the resident who told you that?
5 A. There were a few. I think the first
6 resident that may have said something -- maybe I
7 don't remember the first, but I remember a Sara
8 Azari telling me and she lived in the building.
9 Q. Do you know approximately when Sara Azari
10 told you that?
11 A. I don't recall the time, but I remember it
12 being one of the shifts after that whole -- me
13 working on the 22nd. It was later on in the week,
14 maybe the following Sunday.
15 Q. What did Ms. Azari tell you?
16 A. Not much. She just mentioned, as many of
17 the residents that day mentioned, "did you hear what
18 happened" and just kind of like quickly caught me
19 up. And at that moment I realized, oh, I didn't
20 know this.
21 Q. When you said that she and other residents
22 said "did you hear what happened" and they caught
23 you up, what did they tell you happened?
24 A. When they told me something happened, it
25 wasn't anything deep. I think it was just insight.

Page 28

1 I believe Ms. Azari may have mentioned something
2 happened in the penthouse, something happened with
3 Johnny Depp.
4 Q. Okay. Was she anymore specific than that?
5 A. No.
6 Q. Did you later come to have more of an
7 understanding of what allegedly happened in the
8 penthouse?
9 A. Yes.
10 Q. Okay. What did you come to understand
11 allegedly happened?
12 A. In quickly said, I would say there was a
13 physical assault and Johnny had to vacate the
14 premises.
15 Q. Who told you that?
16 A. I think I kind of captured it amongst a
17 bunch of different resources. I reached out to
18 Trinity just to ensure that I was doing everything
19 right and then when residents told me that there
20 were people, photographers outside, I didn't
21 understand what to do and I reached out to my
22 supervisor, who was Trinity, and she kind of let me
23 know a little bit more and then she mentioned that
24 some of the allegations -- not saying anything was
25 true or false, just, "hey, heads up, these are some

Page 29

1 of the things being said." And none of us knew
2 exactly what it was, so we were just proceeding with
3 caution with many allegations, I guess.
4 Q. Okay. You've used allegations a couple of
5 times. Can you explain what you mean, what you were
6 told the allegations were?
7 A. I would say I'm using allegation -- I could
8 completely be using it in the wrong context. It was
9 just something that was mentioned, it may not be a
10 fact, it was just a piece of information. That's
11 what I mean by allegation. And what we heard in
12 quick said as all of us kind of switched off shifts
13 is this was said during my, shift, whether it be
14 from a resident, whether it be from someone that as
15 I was monitoring the services, trying to capture
16 pictures, someone -- I guess the collaborative
17 message was that there was a domestic violence case
18 with Johnny Depp and Amber and just to proceed with
19 caution because at that moment we were not coming in
20 contact with Amber because she was around more
21 during that time to us and talking to us than she
22 has been living in there.
23 Q. Well, when you -- did you have any personal
24 opinions about the domestic violence allegations
25 that Ms. Heard had made?

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1 A. No.
2 Q. Okay. Backing up to earlier in your
3 testimony, you testified that when you interacted
4 with Ms. Heard on May 22nd, which was the day after
5 the police was called, she looked radiant and
6 beautiful. Did you see any evidence when you were
7 interacting with Ms. Heard on that day that she had
8 been the victim of domestic violence the day before?
9 A. No.
10 Q. Okay. In your interactions with the
11 residents and the other -- let's start with the
12 residents, the residents of the Eastern Columbia
13 Building. Did you get any sense from any of the
14 residents what their views were about the
15 allegations that Ms. Heard had made against
16 Mr. Depp?
17 A. Not clear views. I think everyone was
18 curious just saying other things maybe that they
19 read. No one had concrete facts and that's why I
20 proceeded with just doing my job and not trying to
21 look too much into it, but being informed when I do
22 run into like media or anyone, just being informed
23 what I wanted to take from everyone's sayings. I
24 think there was a lot of people saying different
25 things, but no one really knew what was happening

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1 and I think for me I had no idea that it was the
2 next day until later, way later that I interacted
3 with her. And I guess it put me in a weird
4 situation because I was like I had no idea that it
5 was like the next day that those allegations
6 happened that I came in contact with her. That's
7 why I am here is to ensure that, I guess, from what
8 you guys see me interactions, giving my feedback
9 about what happened.
10 Q. Well, given that you did interact with her
11 the very next day after the supposed incident
12 allegedly took place, based on your interactions
13 with her, what is your opinion of those allegations
14 that she made?
15 A. I'm not so 100 percent because I have never
16 seen what the allegations -- it's not something I
17 looked into to be honest. I'll be completely honest
18 with you. I have not looked into what exactly her
19 allegations were. I just know that I was doing my
20 job at that moment. And after hearing everything
21 and kind of piecing it together myself, I interacted
22 with her that specific day and I seen her and I
23 don't think she had heavy makeup on. I don't
24 believe that from my interaction with her and seeing
25 her, all the allegations don't match in my opinion,

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1 if that's what you're asking.
2 Q. Yes. So when you say in your opinion the
3 allegations don't match, can you explain more what
4 you mean by that?
5 A. Yes. So in piecing together -- can you
6 tell me what the allegations are and maybe we can go
7 from there?
8 Q. Sure.
9 A. Because I'm piecing it together. Sorry.
10 Q. I will represent to you that the allegation
11 that she made was that Mr. Depp threw a cell phone
12 and hit her in the face and punched her in the face
13 as well and that she had bruises and cuts on her
14 face as a result of those alleged physical assaults.
15 So with that representation of what her
16 allegation was and going back to your prior
17 testimony that you didn't think the allegations fit
18 with what you had seen, can you explain what you
19 mean?
20 A. So someone who was bruised and cut, that
21 when I -- the interaction I had with her, I would
22 say that wasn't a person that was bruised or cut. I
23 didn't see any of those. And I think the thing
24 about me that I do do is I look at everyone in their
25 eyes. So I looked at her in her eyes and I would

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1 notices things like that and just the humanistic
2 part of me, if I noticed anything wrong I would ask
3 like I always asked her with that interaction and
4 others that I had after that because I did have
5 interactions after that with her and I did see --
6 you know, I'm one of the people that's responsive.
7 If you look at the footage it wasn't like really
8 quick, it wasn't like I ran to the package room.
9 There was dialogue that happened, just to make sure
10 like all the residents have a good experience with
11 me and they trust me and feel comfortable. Going
12 back to the allegations is if someone said they were
13 bruised or cut, I think you would be able to see
14 those things and I at that moment did not see those
15 things. That doesn't necessarily mean that they
16 didn't happen; however, I was very like aware of her
17 and I think she's very radiant and beautiful and I
18 would notice if she was bruised or anything looked a
19 little odd and in my opinion of that day I didn't
20 see those.
21 Q. Okay. Did you have any conversations with
22 any of the other staff at the Eastern Columbia
23 Building about the allegations that Ms. Depp had
24 made against -- sorry, Ms. Heard had made against
25 Mr. Depp?

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1 A. I'm sorry, repeat your question.
2 Q. Let me back up. I misspoke.
3 At any point in time did you have
4 conversations with other people who worked in the
5 Eastern Columbia Building about the allegations that
6 Ms. Heard had made against Mr. Depp?
7 A. Prior to that day or after that day?
8 Q. At any point in time.
9 A. When I started my shift that specific day I
10 do remember just -- we do quick passes, pass-offs
11 meaning they clock out when I clock in so there's
12 not much dialogue. That day I wasn't set up for
13 that. I had no idea what was happening. And then
14 after that we would, we would have a little bit of a
15 touch base saying -- and I think one of the things
16 we all would say if you talk to us is we did just
17 mention we seen her, "did you see her?" "Yeah, I
18 seen her."
19 As far as the allegations, I don't think
20 any of us wanted to speak to them. I did come to my
21 boss as I started to hear different things just to
22 check in, and that's Trinity. I did try to check in
23 with her, as I said a little bit earlier, just
24 saying what's going on, this is happening, and then
25 she kind of, kind of gave me a little -- pieced it

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1 together a little bit better for me to help me
2 understand, but I don't think any of it was like
3 concrete or solid. From what you said, like a cell
4 phone and a punch, that wasn't in most of the
5 conversations I had. I think it was other things
6 and other assumptions of what happened. I think the
7 main thing that all of us would say is proceed with
8 caution, there's like a domestic violence situation
9 that's happening, so if you see any of the parties
10 just be professional and ensure that you give them
11 great service.
12 Q. Let me -- correct me if I'm wrong, but I
13 think you just said that you touched base with other
14 people who worked in the building and one of the
15 touch base comments that was going between you and
16 the other people was "have you seen her?" Did I
17 under that correctly?
18 A. Yes. And that came -- sorry, that came a
19 little after when I chimed in with my boss and I was
20 able to get a peace of mind. Because I typically
21 work on Sundays, so it was a whole week of time and
22 if I'm not there consistently I try to give a little
23 bit extra and sometimes I communicate to Trinity if
24 there's anything happening that happened in that
25 week that I should know before coming in blind-sided

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1 on a Sunday.
2 Q. So who were the people that you touched
3 base with about whether they had seen Ms. Heard or
4 not?
5 A. Michael.
6 Q. Okay.
7 A. Michael, he was the shift after me and
8 often he would take the shift before mine if he
9 needed the hours. And then I talked to Trinity
10 about it and I have seen Alex as well and Alex and I
11 just simply asked quick conversations about it.
12 Q. What quick conversations did you have with
13 Alex about Ms. Heard?
14 A. He just asked if I knew what was happening.
15 Q. Did he indicate to you that he had seen
16 Ms. Heard in person?
17 A. He did.
18 Q. Did he give you any opinion about whether
19 she appeared to be someone who was injured or not
20 when he saw her?
21 A. With me he did not.
22 Q. Okay. Did you talk to Trinity as far as
23 about whether she had seen Ms. Heard?
24 A. Talked about, talked to Ms. Esparza if she
25 seen her, yes.

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1 Q. Okay. Did Ms. Esparza indicate to you that
2 Ms. Heard looked like she was physically injured
3 when she saw her?
4 A. No.
5 Q. Okay. Take a quick break. Off the record.
6 THE VIDEOGRAPHER: Going off the record at
7 1:49 p.m.
8 (Off the record.)
9 THE VIDEOGRAPHER: Going back on the record at
10 1:53 p.m.
11 BY MS. BILES:
12 Q. Mr. Harrell, are you aware that we have
13 taken depositions of other people who work at the
14 Eastern Columbia Building?
15 A. Yes.
16 Q. Okay. Last week we took Ms. Esparza's
17 deposition. She testified about conversations that
18 she had had with you as well as other employees of
19 Eastern Columbia in the week after May 22, 2016.
20 The conversations that you described having with
21 Ms. Esparza just now before we went on our break,
22 were those conversations that took place the week of
23 May 22nd?
24 A. I believe those took place after that shift
25 of mine.

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1 Q. Okay.
2 A. So yes.
3 Q. Okay. In your conversations with
4 Ms. Esparza did you indicate to her that when you
5 saw Ms. Heard she didn't appear to have any injuries
6 to her face?
7 A. Yes. When I was asked, I told her that.
8 Q. Okay. Can you elaborate on what you told
9 Ms. Esparza?
10 A. Yes. She and I talked about the situation
11 just as I reached out to her and I said, "hey, this
12 is happening, I'm not sure how to navigate through
13 this." And then she kind of gave me an idea of what
14 was happening. With that being said, I think she
15 kind of stayed with, with me throughout the journey
16 I guess you can say in the aspects of following up
17 and making sure like several conversations happened
18 just so I felt comfortable going to work and
19 understanding kind of what was happening. She
20 didn't go into depth with the actual situation. She
21 just kind of asked questions that I felt like she
22 knew more about, so I just gave her the answers that
23 were appropriate. She did ask me if I seen her and
24 I said yes. She did ask me around timings, so I
25 gave her like a range of the timing and I imagine

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1 she was going to go and look at the surveillance
2 because we can roll it back. And then she also
3 asked me during one of those interactions if I seen
4 her and she looked hurt and at that moment I said
5 no, because she didn't look hurt while I seen her.
6 Q. I want to clean that up a little bit
7 because there's a lot of "shes" in there and I want
8 to make sure we know who we're talking about.
9 So the conversations you've described were
10 with Ms. Esparza just now?
11 A. Yes.
12 Q. When you say she asked you if she looked
13 hurt, who asked you if who looked hurt?
14 A. Trinity asked me if Amber looked hurt when
15 I seen her.
16 Q. And what was your response to Ms. Esparza
17 about whether Amber Heard looked hurt when you saw
18 her?
19 A. No.
20 Q. Okay. And that was based on your
21 interaction with Ms. Heard when?
22 A. That date and after that date.
23 Q. When you say "that date" you mean May 22,
24 2016?
25 A. Yes.

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1 Q. Okay. Among the guests that Ms. Heard has
2 had that you have seen in the Eastern Columbia
3 Building, you mentioned a couple that you recognized
4 or knew the names of. Is there anyone else that you
5 saw in the Eastern Columbia Building as a guest of
6 Ms. Heard whom you recognized, but you have not
7 named yet?
8 A. No.
9 Q. Did you ever see Elon Musk in the Eastern
10 Columbia Building?
11 A. Personally I would not be able to identify
12 who that is. Did I hear amongst the concierge team
13 that maybe he had came, yes.
14 Q. Okay. When you say you might have heard
15 among the concierge team, first of all, when did you
16 hear among the concierge team that Mr. Musk might
17 have come to the building?
18 A. Following that shift, so I'm not sure if it
19 was that week or week after, but throughout the --
20 like when it was like high profile, like when we
21 were like on it and consistently just tracking each
22 other's behavior with the situation, I think within
23 those weeks following. I would say like three weeks
24 prior I think someone said it and I can't exactly
25 tell you who said it, but I believe I remember one

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1 of them saying that Elon Musk visited the building
2 and he was Amber's guest.
3 Q. Okay. I want to break that down a little
4 bit. When you say the weeks following, you mean the
5 weeks after May 22, 2016 you heard from other staff
6 at the Eastern Columbia Building that Mr. Musk had
7 been a guest of Ms. Heard's?
8 A. Yes.
9 Q. When was Mr. -- what was your understanding
10 of when Mr. Musk had been a guest of Ms. Heard?
11 A. I'm sorry, can you say explain?
12 Q. Sure. What was your understanding of when
13 Mr. Musk had been a guest?
14 A. Like when, timing or --
15 Q. Yes. Yes. In your conversations with the
16 other staff people at the Eastern Columbia Building
17 about Mr. Musk being in the building as a guest of
18 Ms. Heard, in those conversations did you get any
19 other understanding of when he had been a guest?
20 A. I would, I -- I would only take from the
21 times they worked, so if it was a pass-off they work
22 a certain shift, so maybe the night. I usually
23 worked in morning and so it was more of a night
24 thing. So I would say he visited during the night
25 shift, so it may have been like the later nights.

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1 Q. Okay. And when you say during the night
2 shift, the later nights, was that in May of 2016 or
3 before May of 2016?
4 A. It never -- those conversations happened
5 after May 22nd primarily because I think at that
6 moment it was more of a high profile. I believe
7 that many of them may have saw him prior to that. I
8 personally wouldn't be able to identify him even if
9 he were the guy with the hat because I didn't really
10 look him up. I know who he is on paper, but I don't
11 know what he looks like in a -- like in face to
12 face. But then at that moment when I did hear that
13 he was a visitor, I didn't go and ask any questions.
14 I wasn't like "have you seen him before, when did he
15 come?" I wasn't really interested and if you ask
16 any of the concierges I probably was the least
17 interested in this whole idea. I just came there to
18 come to work. I didn't come there to be a witness
19 to any kind of scene. And I helped her
20 coincidentally during this time and I understand why
21 I'm here; however, I don't remember him being a
22 guest during the shifts that I worked. I do
23 remember women being guests during the shifts that I
24 worked and I do remember those interactions really
25 well.

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1 Q. Okay. But when you say that you heard in
2 the weeks after May 22, 2016 from other staff at the
3 Eastern Columbia Building that he had been a guest,
4 it was your understanding that Mr. Musk had been a
5 guest sometime during May 2016 or before May 2016?
6 A. Yes.
7 Q. Okay. Let's go off the record. I think
8 I'm almost finished. I just want to check my notes.
9 THE VIDEOGRAPHER: Going off the record at
10 2:00 p.m.
11 (Off the record.)
12 THE VIDEOGRAPHER: Going back on the record at
13 2:08 p.m.
14 BY MS. BILES:
15 Q. Mr. Harrell, when you were working the
16 Eastern Columbia Building after this May 21st
17 alleged incident, did you see any lawyers for
18 Mr. Depp enter the building?
19 A. Not that I recall.
20 Q. Did you hear that there were any lawyers
21 working on behalf of Mr. Depp who were collecting
22 surveillance videos?
23 A. I did hear something to that nature from
24 Trinity.
25 Q. Okay. Did you have any personal

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1 interactions with those lawyers?
2 A. I did not until I believe I got like a -- I
3 got the note from Trinity saying that I maybe have
4 to testify as a witness.
5 Q. Okay. Did you ever have any interactions
6 with anyone at any point in time from the Bloom
7 Hergott law firm?
8 A. (No response.)
9 Q. During this -- let me back up. Sorry.
10 Strike that.
11 After May 22, 2016 did you have any
12 interactions with anyone from the Bloom Hergott law
13 firm?
14 A. Was that the law firm that was handling the
15 case before?
16 Q. That was one law firm that represents
17 Mr. Depp, represented Mr. Depp. But do you recall
18 that name or having any interactions with them?
19 A. I do remember that name in some way. I
20 believe that's where I had to go and testify before,
21 if I'm not mistaken.
22 Q. Did you have any interactions with anyone
23 named Jake Bloom?
24 A. I don't believe so.
25 Q. Okay. I don't have anything further.

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1 Thank you.
2 MR. WRENSHALL: I just have a couple questions.
3
4 EXAMINATION
5
6 BY MR. WRENSHALL:
7 Q. Ready? Okay, Mr. Harrell, so just a few
8 questions.
9 You were previously deposed in connection
10 with the divorce proceeding between Mr. Depp and
11 Ms. Heard; is that correct?
12 A. I'm sorry, what was your question?
13 Q. You were previously deposed; is that
14 correct?
15 A. Yes.
16 Q. And that was in connection with the divorce
17 proceeding between Mr. Depp and Ms. Heard; is that
18 correct?
19 A. Yes.
20 Q. Okay. Do you recall the names of the
21 lawyers who took your deposition?
22 A. I do not. I believe I have some of the
23 things at home as far as the names that were
24 attached to the documents. I believe Trinity has
25 like the whole deposition.

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1 Q. Okay. Was it a man or a woman who took
 2 your deposition?
 3 A. There was a woman.
 4 Q. Okay. No more questions.
 5 MS. BILES: Okay. Same stipulation?
 6 MR. WRENSHALL: You have to read it.
 7 MS. BILES: I have to read it.
 8 MR. WRENSHALL: Sorry.
 9 MS. BILES: I'm not a California lawyer so this
 10 is going to be hard.
 11 Mr. Harrell, thank you for coming today.
 12 We very much appreciate you being here. We are
 13 going to read a brief stipulation into the record.
 14 I offer the following stipulation for the
 15 record; that the court reporter be relieved of her
 16 responsibility with respect to the original
 17 transcript and that the original be transcribed and
 18 signed by Mr. Harrell under penalty of perjury. The
 19 original will be sent to Mr. Harrell at the address
 20 you have provided. You'll read that transcript and
 21 make any corrections to it if necessary.
 22 Is two weeks enough time for you to review
 23 your deposition transcript?
 24 THE WITNESS: From this interaction?
 25 MS. BILES: Yes.

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1 THE WITNESS: Yeah, that's fine.
 2 MS. BILES: Okay. If we're not notified of any
 3 changes within that two-week time period the
 4 original shall be deemed signed and correct. The
 5 notice of any changes or corrections can be sent to
 6 Brown Rudnick LLP at Irvine, California, the same
 7 place that you got the deposition notice from. The
 8 original transcript will be maintained by that
 9 office. If the original is not available, then a
 10 certified copy of the same corrected can be used for
 11 any purpose for which the original might have been
 12 used. I think that's all.
 13 MR. WRENSHALL: I stipulate to that.
 14 THE VIDEOGRAPHER: We are off the record at
 15 2:13 p.m. and this marks -- I'm sorry. We are off
 16 the record at 2:13 p.m. and this concludes today's
 17 testimony given by Cornelius Harrell. The total
 18 number of media used was one and will be retained by
 19 Veritext Legal Solutions.
 20 THE REPORTER: Counsel, do you need a copy?
 21 MR. WRENSHALL: Yes.
 22 MS. BILES: If we could get a rough, that would
 23 be great.
 24 THE REPORTER: Mr. Waldman, do you need a copy?
 25 MR. WRENSHALL: He hung up.

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1 MS. BILES: Yes, he does need a copy.
 2 (The deposition was concluded at 2:14 p.m.)
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1 ACKNOWLEDGMENT OF DEPONENT
 2 I, CORNELIUS HARRELL, do hereby certify
 3 that I have read the foregoing transcript of my
 4 testimony taken on 1/31/19, and further certify
 5 that it is a true and accurate record of my
 6 testimony (with the exception of the corrections
 7 listed below):
 8 Page Line Correction
 9 _____
 10 _____
 11 _____
 12 _____
 13 _____
 14 _____
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 16 _____
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 18 _____
 19 _____
 20 _____
 21 _____
 22 Signed under the pains and penalties of perjury
 23 this ____ day of _____, 20__.
 24 _____
 25 CORNELIUS HARRELL

CERTIFICATE

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STATE OF CALIFORNIA) ss
COUNTY OF LOS ANGELES)
I, SHAWNA HIGGINS, Certified Shorthand Reporter
No. 10646 for the State of California, do hereby
certify:
That the foregoing deposition was taken before
me at the time and place therein set forth, at
which time the witness was put under oath by me;
That the testimony of the witness and all
objections made at the time of the examination were
recorded stenographically by me, were thereafter
transcribed by me by means of computer and the
foregoing is a true record of same.
I further certify that I am neither counsel for
nor related to any party to said action, nor in any
way interested in the outcome thereof.
IN WITNESS WHEREOF, I have subscribed my name
this 9th day of February 2019.


SHAWNA HIGGINS
CSR NO. 10646

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