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IN THE CIRCUIT COURT OF FAIRFAX COUNTY
SUPREME COURT OF VIRGINIA

FILED
CIVIL PROCESSING
2022 JUN 10 P 2:33

JOHN C. DEPP II,)

)

PLAINTIFF,)

)

CASE NO. CL-2019-2911

VS.)

)

AMBER LAURA HEARD,)

)

DEFENDANT.)

)

VIDEOTAPED DEPOSITION OF ELIZABETH RAE MARZ

TUESDAY, NOVEMBER 26, 2019

REPORTED BY: DAYNA HESTER, C.S.R. 9970

JOB NO. 3776627

PAGES 1 - 299

Page 1

<p>1 VIDEOTAPED DEPOSITION OF ELIZABETH RAE MARZ, TAKEN 2 ON BEHALF OF PLAINTIFF, AT 10:34 A.M., TUESDAY, 3 NOVEMBER 26, 2019, AT 1900 AVENUE OF THE STARS, 4 SUITE 1400, LOS ANGELES, CALIFORNIA, BEFORE DAYNA 5 HESTER, C.S.R. NO. 9970, PURSUANT TO NOTICE. 6 7 APPEARANCES OF COUNSEL: 8 FOR PLAINTIFF: 9 BROWN RUDNICK LLP BY: CAMILLE VASQUEZ, ESQ. 10 2211 MICHELSON DRIVE, 7TH FLOOR IRVINE, CALIFORNIA 92612 11 (949) 752-7100 CVASQUEZ@BROWNRUDNICK.COM 12 -AND- 13 THE ENDEAVOR LAW FIRM, P.C. 14 BY: ADAM WALDMAN, ESQ. 5163 TILDEN ST NW 15 WASHINGTON, DC 20016-1961 (202) 715-0966 16 AWALDMAN@THEENDEAVORGROUP.COM 17 18 FOR DEFENDANTS: 19 SUSMAN GODFREY LLP BY: DAVIDA BROOK, ESQ. 20 1900 AVENUE OF THE STARS, SUITE 1400 LOS ANGELES, CALIFORNIA 90067 21 (310) 789-3105 DBROOK@SUSMANGODFREY.COM 22 23 24 25 -- APPEARANCES CONTINUED ON NEXT PAGE --</p>	<p>1 I N D E X 2 DEPONENT EXAMINATION PAGE 3 ELIZABETH RAE MARZ 4 EXAMINATION BY MS. VASQUEZ 8, 81 5 EXAMINATION BY MS. BROOK 239 6 7 8 QUESTIONS INSTRUCTED BY COUNSEL NOT TO ANSWER 9 PAGE LINE 10 14 7 11 12 E X H I B I T S 13 EXHIBIT NO. PAGE DESCRIPTION 14 EXHIBIT 1 19 COURT DOCUMENT TITLED "DEPOSITION SUBPOENA FOR PERSONAL APPEARANCE 15 AND PRODUCTION OF DOCUMENTS, ELECTRONICALLY STORED INFORMATION, 16 AND THINGS IN ACTION PENDING OUTSIDE CALIFORNIA" 17 EXHIBIT 2 25 SCREENSHOT OF TEXT MESSAGE 18 EXCHANGE; BATES NO. DEPP V. HEARD EM 002 19 EXHIBIT 3 68 COURT DOCUMENT TITLED "DEPOSITION 20 OF ELIZABETH MARZ, VOLUME I" 21 EXHIBIT 4 162 COURT DOCUMENT TITLED "DEPOSITION OF OFFICER MELISSA SAENZ" 22 EXHIBIT 5 177 COURT DOCUMENT TITLED "VIDEOTAPED 23 DEPOSITION OF AMBER LAURA DEPP, VOLUME II" 24 25 -- EXHIBITS CONTINUED ON NEXT PAGE --</p>
<p>1 APPEARANCES OF COUNSEL (CONTINUED): 2 FOR THE WITNESS: 3 SUMMA, LLP BY: ANYA GOLDSTEIN, ESQ. 4 800 WILSHIRE BOULEVARD, SUITE 1050 LOS ANGELES, CALIFORNIA 90017 5 (213) 260-9451 ANYA@SUMMALLP.COM 6 7 ALSO PRESENT: 8 MONA GOODARZI, BROWN RUDNICK LLP 9 BRITTANY FOWLER, SUSMAN GODFREY LLP 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>	<p>1 E X H I B I T S (CONTINUED) 2 EXHIBIT NO. PAGE DESCRIPTION 3 EXHIBIT 6 180 COURT DOCUMENT TITLED "DEPOSITION OF OFFICER TYLER HADDEN" 4 EXHIBIT 7 190 E-MAIL FROM LIZ MARZ TO ANYA 5 GOLDSTEIN, TRANSMIT DATE THU. NOV 14, 2019, WITH FORWARD E-MAIL AND 6 ATTACHMENT; BATES NOS. DEPP V. HEARD EM 003 - DEPP V. HEARD EM 008 7 EXHIBIT 8 204 E-MAIL FROM LIZ MARZ TO ANYA 8 GOLDSTEIN, TRANSMIT DATE THU. NOV 14, 2019, WITH FORWARD E-MAIL AND 9 ATTACHMENT; BATES NOS. DEPP V. HEARD EM 027 - DEPP V. HEARD EM 036 10 11 EXHIBIT 9 232 FLASH DRIVE CONTAINING SURVEILLANCE VIDEO CLIPS 12 EXHIBIT 10 241 STILL PHOTOGRAPH TAKEN FROM EXHIBIT 13 9 14 EXHIBIT 11 243 STILL PHOTOGRAPH TAKEN FROM EXHIBIT 9 WITH WITNESS MARKING 15 EXHIBIT 12 260 DOCUMENT DESCRIBED AS FLOOR PLAN OF 16 849 SOUTH BROADWAY PENTHOUSE 17 EXHIBIT 13 274 PHOTOGRAPHS; BATES NOS. ALH_00000504 - ALH_00000499 18 19 20 21 22 23 24 25</p>

<p>1 LOS ANGELES, CALIFORNIA</p> <p>2 TUESDAY, NOVEMBER 26, 2019; 10:34 A.M.</p> <p>3</p> <p>4 THE VIDEOGRAPHER: Good morning.</p> <p>5 We're on the record at 10:34 a.m. on 10:34</p> <p>6 November 26th, '20 -- sorry, November 26th, 2019. 10:34</p> <p>7 Please note that the microphones are 10:34</p> <p>8 sensitive and may pick up whispers, private 10:34</p> <p>9 conversations, and cellular interference. 10:34</p> <p>10 Audio and video recording will continue to 10:34</p> <p>11 take place unless all parties agree to go off the 10:34</p> <p>12 record. 10:34</p> <p>13 This is Media Unit Number 1 of the 10:34</p> <p>14 video-recorded deposition of Elizabeth Marz taken by 10:34</p> <p>15 counsel for the plaintiff in the matter of John C. 10:34</p> <p>16 Depp, II, versus Amber Laura Heard, filed in the 10:34</p> <p>17 Circuit Court of Fairfax County, Virginia. Case 10:34</p> <p>18 Number CL-2019-2911. 10:34</p> <p>19 This deposition is being held at Susman 10:34</p> <p>20 Godfrey located at 1900 Avenue of the Stars, Los 10:34</p> <p>21 Angeles, California 90067. 10:35</p> <p>22 My name is Steven Togami from the firm 10:35</p> <p>23 Veritext Legal Solutions, and I am the videographer. 10:35</p> <p>24 The court reporter is Dayna Hester from 10:35</p> <p>25 the firm Veritext Legal Solutions. 10:35</p> <p style="text-align: right;">Page 6</p>	<p>1 THE REPORTER: Do you affirm the testimony</p> <p>2 you are about to give in the cause now pending will</p> <p>3 be the truth, the whole truth, and nothing but the</p> <p>4 truth?</p> <p>5 THE WITNESS: Yes.</p> <p>6 THE REPORTER: Thank you.</p> <p>7</p> <p>8 ELIZABETH RAE MARZ,</p> <p>9 having been first duly sworn, was</p> <p>10 examined and testified as follows:</p> <p>11</p> <p>12 EXAMINATION 10:36</p> <p>13 BY MS. VASQUEZ: 10:36</p> <p>14 Q. Good morning, Ms. Marz. 10:36</p> <p>15 A. Good morning. 10:36</p> <p>16 Q. We -- I introduced myself to you off the 10:36</p> <p>17 record. My name is Camille Vasquez, and I represent 10:36</p> <p>18 Mr. Depp. 10:36</p> <p>19 Ms. Marz, do you prefer to be called 10:36</p> <p>20 "Elizabeth," "Liz," or "Ms. Marz"? 10:36</p> <p>21 A. Liz. 10:36</p> <p>22 Q. Liz. And I understand, Liz, you have been 10:36</p> <p>23 deposed before in Mr. Depp and Ms. Amber Heard's 10:36</p> <p>24 divorce proceeding back in July of 2016. Have you 10:36</p> <p>25 ever been deposed since then? 10:36</p> <p style="text-align: right;">Page 8</p>
<p>1 I am not related to any party in this 10:35</p> <p>2 action nor am I financially interested in the 10:35</p> <p>3 outcome. 10:35</p> <p>4 If there are any objections to proceeding, 10:35</p> <p>5 please, state them at the time of your appearance. 10:35</p> <p>6 At this time, will counsel and all present 10:35</p> <p>7 please state their appearances and affiliations for 10:35</p> <p>8 the record. 10:35</p> <p>9 MS. VASQUEZ: Camille Vasquez from Brown 10:35</p> <p>10 Rudnick for Mr. Depp. 10:35</p> <p>11 MS. GOODARZI: Mona Goodarzi from Brown 10:35</p> <p>12 Rudnick for Mr. Depp. 10:35</p> <p>13 MR. WALDMAN: Adam Waldman from Debra law 10:35</p> <p>14 for Johnny Depp. 10:35</p> <p>15 MS. BROOK: Davida Brook from Susman 10:35</p> <p>16 Godfrey for Ms. Heard. And with me today is my 10:35</p> <p>17 associate Brittany Fowler. 10:35</p> <p>18 MS. GOLDSTEIN: Anya Goldstein, Summa LLP 10:35</p> <p>19 for the witness, Elizabeth Marz. And I'm here with 10:35</p> <p>20 the witness, Elizabeth Marz. 10:35</p> <p>21 THE VIDEOGRAPHER: Thank you. 10:36</p> <p>22 Could we, please, have the oath. 10:36</p> <p>23 THE REPORTER: Please raise your right</p> <p>24 hand.</p> <p>25 THE WITNESS: (Witness did as requested.)</p> <p style="text-align: right;">Page 7</p>	<p>1 A. No. 10:36</p> <p>2 Q. Okay. Were you -- had you been deposed 10:36</p> <p>3 before the deposition that you took in July of 2016? 10:36</p> <p>4 A. Have I been deposed before? 10:36</p> <p>5 Q. Yes. 10:36</p> <p>6 A. No. 10:36</p> <p>7 Q. Since it was a few years ago, if you don't 10:36</p> <p>8 mind, I'm just going to go over some ground rules to 10:36</p> <p>9 remind you and refresh your recollection. 10:37</p> <p>10 So as you can see, the shorthand certified 10:37</p> <p>11 court reporter just gave you an oath today, and you 10:37</p> <p>12 are expected give truthful and complete answers. 10:37</p> <p>13 Do you understand that? 10:37</p> <p>14 A. Yes. 10:37</p> <p>15 Q. I am also entitled to your best 10:37</p> <p>16 recollection of your questions that I pose so I ask 10:37</p> <p>17 that you not guess. If you don't know an answer to 10:37</p> <p>18 a question that I pose, just tell me you don't 10:37</p> <p>19 understand or you don't know the answer versus 10:37</p> <p>20 guessing. But I am entitled to your best estimate. 10:37</p> <p>21 A. Uh-huh. 10:37</p> <p>22 Q. Do you understand? 10:37</p> <p>23 A. Yes. 10:37</p> <p>24 Q. Okay. The oath that you took today has 10:37</p> <p>25 the same force and effect, and penalties of penalty 10:37</p> <p style="text-align: right;">Page 9</p>

1 of perjury remain the same as if we were in a 10:37
2 courtroom with a judge present. 10:37
3 Do you understand that? 10:37
4 A. Yes. 10:37
5 Q. And you understand that perjury is a 10:37
6 crime? 10:37
7 A. Yes. 10:37
8 Q. Okay. The court reporter is taking down 10:37
9 everything that is said. So that I ask that you, 10:37
10 please, not give nonverbal responses or gestures 10:37
11 like shaking your head and the common phrase is 10:37
12 "uh-huh," that's also not preferred. Please answer 10:37
13 the questions with "yes," "no" and an explanation if 10:38
14 the question calls for it. 10:38
15 Do you understand that? 10:38
16 A. Yes. 10:38
17 Q. Okay. Let's try not to speak over one 10:38
18 another. I know it's natural for people to, you 10:38
19 know, get into, like, a conversational rapport with 10:38
20 one another, but because the court reporter can only 10:38
21 take down one at a time, please, allow me to finish 10:38
22 my question before answering and also give your 10:38
23 attorney time to object, if she chooses to. And I 10:38
24 will try to do the same as to not speak over one 10:38
25 another. 10:38

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1 Do you understand that instruction? 10:38
2 A. Yes. 10:38
3 Q. Okay. And if you don't understand one of 10:38
4 my questions, please just ask me to rephrase it, so 10:38
5 I can -- you know, I'm not here to trick you. I 10:38
6 just want to ask you the questions, and if my 10:38
7 question isn't clear, please, ask me to rephrase it, 10:38
8 and I'll do my best to do so. 10:38
9 At the end of this testimony, you'll 10:38
10 receive a notebook of sorts, a booklet with your 10:38
11 testimony transcribed, and you'll have an 10:39
12 opportunity to review that and make any changes. I 10:39
13 will caution you, though, that if you make any 10:39
14 substantive changes, I or another attorney could 10:39
15 comment on those changes at trial. So I am entitled 10:39
16 to your best testimony today. 10:39
17 Could you, please, state your full name 10:39
18 for the record? 10:39
19 A. Elizabeth Rae Marz. 10:39
20 Q. And is there any reason that you are 10:39
21 unable to provide me with accurate testimony today? 10:39
22 A. No. 10:39
23 Q. Okay. Have you ingested alcohol in the 10:39
24 last 12 hours? 10:39
25 A. No. 10:39

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1 Q. Have you taken any medication? 10:39
2 A. No. 10:39
3 Q. Did you prepare for this deposition today? 10:39
4 A. Yes. 10:39
5 Q. How did you prepare for this deposition? 10:39
6 A. I met with my lawyer. 10:39
7 Q. How many times did you meet with your 10:39
8 lawyer? 10:39
9 A. Twice. 10:39
10 Q. And how long would you say you met with 10:39
11 your lawyer each of those two meetings? 10:39
12 A. The first, about -- little over two hours 10:39
13 and then the second maybe a little over an hour. 10:40
14 Q. When was the first meeting with your 10:40
15 lawyer? 10:40
16 A. The first meeting in person? Yesterday. 10:40
17 Q. Is that the meeting that lasted a little 10:40
18 bit over an hour? 10:40
19 A. Yes. 10:40
20 Q. Okay. 10:40
21 A. A little over two hours. 10:40
22 Q. A little over two hours? 10:40
23 A. Uh-huh. 10:40
24 Q. So the first meeting with your lawyer was 10:40
25 over the phone? 10:40

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1 A. We had a conversation over the phone. 10:40
2 Q. Was anybody else present with you when you 10:40
3 met with your lawyer? 10:40
4 A. No. 10:40
5 Q. Did you review any documents to prepare 10:40
6 for your deposition today? 10:40
7 MS. GOLDSTEIN: Objection. Calls for 10:40
8 privileged information. You can ask her whether she 10:40
9 reviewed any documents that she wasn't directed to 10:40
10 review by her lawyer, and then you'll see the basis 10:40
11 for my objection. 10:40
12 MS. VASQUEZ: I'm asking her, and the 10:40
13 court reporter can read back my question -- do you 10:40
14 mind actually reading it back. 10:40
15 (The following record was read: 10:41
16 "QUESTION: Did you review any 10:40
17 documents to prepare for your 10:40
18 deposition today?") 10:40
19 MS. VASQUEZ: So it's a "yes" or "no" 10:41
20 question, it's not the substance of -- 10:41
21 MS. GOLDSTEIN: She can answer that 10:41
22 question. 10:41
23 MS. VASQUEZ: She can answer? 10:41
24 MS. GOLDSTEIN: Yes. 10:41
25 MS. VASQUEZ: So you withdraw your 10:41

Page 13

1 objection.	10:41	1 was it within the last month?	10:42
2 BY MS. VASQUEZ:	10:41	2 A. No.	10:42
3 Q. Okay. Please answer it.	10:41	3 Q. Was it within the last two months?	10:43
4 A. [Witness nods head up and down].	10:41	4 MS. BROOK: Objection. Calls for	10:43
5 Q. You did?	10:41	5 speculation.	10:43
6 A. Yes.	10:41	6 THE WITNESS: No.	10:43
7 Q. What documents did you review?	10:41	7 BY MS. VASQUEZ:	10:43
8 MS. GOLDSTEIN: Objection. Calls for	10:41	8 Q. Was it within the last three months?	10:43
9 privileged information.	10:41	9 MS. BROOK: Same objection.	10:43
10 MS. VASQUEZ: The documents that she	10:41	10 THE WITNESS: No.	10:43
11 reviewed is privileged?	10:41	11 BY MS. VASQUEZ:	10:43
12 MS. GOLDSTEIN: Yes. She -- the only	10:41	12 Q. More than six months ago?	10:43
13 documents she reviewed in preparation for her	10:41	13 MS. BROOK: Same objection.	10:43
14 deposition were at the direction of her lawyer and	10:41	14 THE WITNESS: No.	10:43
15 the selection of those documents was privileged.	10:41	15 BY MS. VASQUEZ:	10:43
16 MS. VASQUEZ: I disagree with your	10:41	16 Q. A week ago?	10:43
17 objection, Counsel, but...	10:41	17 A. No.	10:43
18 MS. GOLDSTEIN: Noted.	10:41	18 Q. More than a year ago?	10:43
19 MS. VASQUEZ: Can you mark that, please?	10:41	19 A. No.	10:43
20 THE REPORTER: Yes.	10:41	20 Q. Less than a year ago?	10:43
21 BY MS. VASQUEZ:	10:41	21 MS. BROOK: Same objection.	10:43
22 Q. Are you going to accept the advice of your	10:41	22 THE WITNESS: Yes.	10:43
23 counsel and not respond to my question, Ms. Marz?	10:41	23 BY MS. VASQUEZ:	10:43
24 A. Yes.	10:41	24 Q. Okay. So you have spoken to Ms. Heard	10:43
25 Q. Okay. Independent of your lawyer, did you	10:41	25 less than a year ago today?	10:43
Page 14		Page 16	
1 review any documents by yourself?	10:42	1 A. Yes.	10:43
2 A. Can you rephrase the question?	10:42	2 Q. And is that the last time you spoke with	10:43
3 Q. Do you not understand it?	10:42	3 her?	10:43
4 A. Yeah. I don't understand the question.	10:42	4 A. Yes.	10:43
5 Q. Okay. Did you review any documents that	10:42	5 Q. How did you speak? Were you in person?	10:43
6 your lawyer did not provide to you ahead of this	10:42	6 A. No.	10:43
7 deposition?	10:42	7 Q. Over the phone?	10:43
8 MS. GOLDSTEIN: And I -- I also advise you	10:42	8 A. We didn't speak over the phone, no.	10:43
9 to exclude documents that I directed you to review.	10:42	9 Q. How did you speak?	10:43
10 THE WITNESS: Uh-huh.	10:42	10 A. Text message.	10:44
11 No.	10:42	11 Q. Do you have your phone with you today?	10:44
12 BY MS. VASQUEZ:	10:42	12 A. No.	10:44
13 Q. Are you paying for your attorney,	10:42	13 Q. You didn't bring your phone?	10:44
14 Ms. Marz?	10:42	14 A. Huh-uh. No.	10:44
15 A. No.	10:42	15 Q. Can I have a verbal answer to my question,	10:44
16 Q. Who is?	10:42	16 please?	10:44
17 A. Amber.	10:42	17 A. I'm sorry. No.	10:44
18 Q. And when you say "Amber," are you	10:42	18 Q. Is there a reason you didn't bring your	10:44
19 referring to Amber Heard?	10:42	19 phone today?	10:44
20 A. Yes.	10:42	20 A. I left it in the car.	10:44
21 Q. Okay. When is the last time you spoke to	10:42	21 Q. Is there a reason you left it in the car?	10:44
22 Ms. Heard?	10:42	22 A. I --	10:44
23 A. I don't remember the specific date or	10:42	23 MS. GOLDSTEIN: It's a "yes" or "no"	10:44
24 time.	10:42	24 question that --	10:44
25 Q. I am entitled to your best estimate, so	10:42	25 You can answer.	10:44
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1	THE WITNESS: Sorry?	10:44	1	BY MS. VASQUEZ:	10:46
2	MS. GOLDSTEIN: It's -- she asked a "yes"	10:44	2	Q. Have you seen this document before,	10:46
3	or "no" question that --	10:44	3	Ms. Marz?	10:46
4	You can answer.	10:44	4	A. Yes.	10:46
5	THE WITNESS: Can you repeat the question?	10:44	5	Q. When did you see this document first?	10:46
6	BY MS. VASQUEZ:	10:44	6	A. When it was handed to me.	10:46
7	Q. Is there a reason you left your phone in	10:44	7	Q. When was it handed to you?	10:46
8	the car?	10:44	8	A. I don't remember the specific date.	10:46
9	A. Yes.	10:44	9	Q. Again, I'm entitled to your best estimate.	10:46
10	Q. Why?	10:44	10	Can you give me a best estimate as to when you	10:46
11	MS. GOLDSTEIN: Objection. Calls for	10:44	11	received this document, when you first saw it?	10:47
12	privileged information.	10:44	12	A. I really don't remember the specific date	10:47
13	MS. VASQUEZ: I disagree with that	10:44	13	when it was handed to me. So, I mean --	10:47
14	objection, Counsel. The reason --	10:44	14	Q. Within the last month or two?	10:47
15	BY MS. VASQUEZ:	10:44	15	A. Within -- yeah, within the last two	10:47
16	Q. Do you usually leave your phone in the	10:44	16	months,	10:47
17	car?	10:44	17	Q. Okay. Did you review the document when	10:47
18	A. Sometimes.	10:44	18	you first received it?	10:47
19	Q. Would reviewing your phone refresh your	10:45	19	A. Yes.	10:47
20	recollection as to when you last texted with	10:45	20	Q. Okay. Turning your attention to Page 4 of	10:47
21	Ms. Heard?	10:45	21	Attachment 3.	10:47
22	A. Yes.	10:45	22	A. [Witness complies].	10:47
23	Q. Okay. Did you produce any text messages	10:45	23	Q. Do you see the paragraph entitled	10:47
24	with Ms. Heard in response to the subpoena that	10:45	24	"Document Request"?	10:47
25	Mr. Depp served on you?	10:45	25	A. Uh-huh. Yes.	10:47
Page 18			Page 20		
1	A. Can you rephrase the question?	10:45	1	Q. And you see that there are approximately	10:47
2	Q. Do you not understand the question?	10:45	2	23 document requests?	10:48
3	A. I don't understand the question.	10:45	3	A. Yes.	10:48
4	MS. VASQUEZ: Do you mind reading back the	10:45	4	Q. Did you review those document requests?	10:48
5	question to the witness, please.	10:45	5	A. Yes.	10:48
6	(The following record was read:	10:45	6	Q. Did you review your files for any	10:48
7	"QUESTION: Okay. Did you produce.	10:45	7	responsive documents?	10:48
8	any text messages with Mr. Depp	10:45	8	A. Responsive documents, what --	10:48
9	[verbatim] in response to the subpoena	10:45	9	Q. To these requests?	10:48
10	that Mr. Depp served on you?")	10:45	10	A. Did I review my files to responsive	10:48
11	MS. VASQUEZ: I believe the	10:45	11	documents?	10:48
12	question was -- well, I could be wrong.	10:45	12	Q. Uh-huh. For responsive documents to	10:48
13	BY MS. VASQUEZ:	10:45	13	these?	10:48
14	Q. But did you produce any text messages with	10:45	14	A. Oh. For responsive -- yes.	10:48
15	Ms. Heard in response to the subpoena that Mr. Depp	10:45	15	Q. Okay. And did you find any responsive	10:48
16	served on you?	10:45	16	documents to these requests?	10:48
17	A. No.	10:45	17	A. Yes.	10:48
18	MS. VASQUEZ: Let's actually mark as	10:45	18	Q. Okay. And are those the documents that	10:48
19	Exhibit Marz I, Deposition Subpoena.	10:45	19	your attorney produced to me this morning?	10:48
20	(Deposition Exhibit I was marked for	10:45	20	A. Yes.	10:48
21	identification and is attached hereto.)	10:46	21	Q. Do you have any other documents in your	10:48
22	MS. BROOK: Ms. Vasquez, you are starting	10:46	22	possession, custody, or control, including text	10:48
23	with Marz I?	10:46	23	messages, that are responsive to any requests posed	10:48
24	MS. VASQUEZ: Yes.	10:46	24	here?	10:48
25	MS. BROOK: Great.	10:46	25	A. No.	10:48
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6 (Pages 18 - 21)

1	Q. Okay. Do you see request Number 2?	10:48	1	time.	10:50
2	A. Yes.	10:48	2	BY MS. VASQUEZ:	10:50
3	Q. Where it asks [reading]:	10:48	3	Q. When you last spoke to Ms. Heard --	10:50
4	"For all documents and all	10:48	4	MS. VASQUEZ: That is a fair objection.	10:50
5	communications by and between you and	10:48	5	BY MS. VASQUEZ:	10:50
6	any person including but not limited to	10:48	6	Q. When you last spoke to Ms. Heard, did she	10:50
7	Ms. Heard relating to the purported	10:48	7	talk to you about this lawsuit?	10:50
8	incident in Los Angeles, California in	10:49	8	A. When I last spoke with her, no.	10:50
9	late 2012 or 2013 in -- "involving	10:49	9	Q. Okay. Has she ever talked to you,	10:50
10	Mr. Depp and Ms. Heard."	10:49	10	Ms. Heard, about this lawsuit?	10:50
11	Do you see that?	10:49	11	MS. BROOK: Same objection.	10:50
12	A. Yes.	10:49	12	THE WITNESS: Just through the text	10:50
13	Q. Okay. Is it your testimony that you have	10:49	13	message that I provided.	10:50
14	no responsive documents in your possession, custody,	10:49	14	BY MS. VASQUEZ:	10:51
15	or control in response to Request Number 2?	10:49	15	Q. The text message you provided?	10:51
16	A. I think I did provide a document -- I did	10:49	16	A. Uh-huh.	10:51
17	provide a text message. Text message, yeah.	10:49	17	Q. [Attorney reviews document].	10:51
18	Q. And is it relating to -- a text message	10:49	18	This doesn't have a year date?	10:51
19	between whom?	10:49	19	MS. BROOK: Sorry. Counsel, can you refer	10:51
20	A. Well, relating to there -- there was text	10:49	20	to -- if you are going to be referring to a	10:51
21	messages that were given.	10:49	21	document --	10:51
22	Q. Do you recall who the text messages were	10:49	22	MS. VASQUEZ: I will.	10:51
23	between?	10:49	23	MS. BROOK: -- will you mark as an	10:51
24	A. There was one with Amber --	10:49	24	exhibit.	10:51
25	Q. Uh-huh.	10:49	25	MS. VASQUEZ: I will.	10:51
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1	A. -- and one with Isalia.	10:49	1	I'm going to mark as Exhibit Marz 2 what	10:51
2	Q. Who is Isalia?	10:49	2	has been provided to me by counsel for the deponent.	10:51
3	A. A friend from New York.	10:49	3	It's Bates labeled Depp v. Heard EM -002.	10:51
4	Q. Is she your friend?	10:49	4	(Deposition Exhibit 2 was marked for	10:51
5	A. Yes.	10:49	5	identification and is attached hereto.)	10:51
6	Q. Is she also Ms. Heard's friend?	10:49	6	BY MS. VASQUEZ:	10:51
7	A. No.	10:49	7	Q. Ms. Marz, referring to your attention to	10:52
8	Q. Has Isalia, to your knowledge, ever met	10:49	8	what has been marked as Marz 2 --	10:52
9	Ms. Heard?	10:49	9	MS. BROOK: Can I have a copy?	10:52
10	A. No.	10:49	10	MS. GOODARZI: Yes.	10:52
11	Q. Has Ms. Isalia ever met Mr. Depp?	10:49	11	MS. BROOK: Thank you.	10:52
12	A. No.	10:49	12	BY MS. VASQUEZ:	10:52
13	Q. When you and Amber last spoke less than a	10:50	13	Q. This appears to be a screenshot of a text	10:52
14	year ago, what did you speak about?	10:50	14	message between you and Amber.	10:52
15	A. We --	10:50	15	Is Amber saved in your phone as	10:52
16	MS. BROOK: Objection. Calls for hearsay.	10:50	16	"Ms. Heard," Amber Heard?	10:52
17	BY MS. VASQUEZ:	10:50	17	A. No.	10:52
18	Q. You can answer.	10:50	18	MS. BROOK: And Ms. Vasquez, just so that	10:52
19	A. Okay. The last time we spoke, it was --	10:50	19	there's no confusion for the record, I believe that	10:52
20	we were both in Italy traveling, so that was -- our	10:50	20	I received the same production of documents this	10:52
21	last text message was about that.	10:50	21	morning and that this document was produced in	10:52
22	Q. Okay. Did Ms. Heard talk to you about	10:50	22	color. I assumed you just didn't have time to make	10:52
23	this lawsuit?	10:50	23	color copies --	10:53
24	MS. BROOK: Same objection.	10:50	24	MS. VASQUEZ: No.	10:53
25	MS. GOLDSTEIN: Objection. Vague as to	10:50	25	MS. BROOK: -- but I'll represent that the	10:53
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7 (Pages 22 - 25)

1 original was produced in color. 10:53	1 Would it be all right if he called 10:54
2 MS. VASQUEZ: It was not produced to me in 10:53	2 you?" 10:54
3 color. 10:53	3 Is that the text message that you received 10:54
4 MS. BROOK: The e-mail? 10:53	4 from Ms. Heard? 10:54
5 MS. VASQUEZ: The copies were not produced 10:53	5 A. Yes. 10:54
6 in color. 10:53	6 Q. Is that the only communication you have 10:54
7 MS. BROOK: Okay. I believe if you check 10:53	7 received from Ms. Heard relating to this lawsuit? 10:54
8 the e-mail, the e-mail is in color. 10:53	8 A. Yes. 10:54
9 BY MS. VASQUEZ: 10:53	9 Q. So you never reached out to Ms. Heard 10:54
10 Q. Is Ms. Heard saved in your phone as 10:53	10 after you spoke to her attorney? 10:54
11 "Amber"? 10:53	11 A. No. 10:54
12 A. Yes. 10:53	12 Q. Did you speak with her attorney? 10:54
13 Q. Okay. Is this the text message, the last 10:53	13 A. Yes. 10:54
14 communication that you had with Ms. Heard this year? 10:53	14 Q. Okay. What was the name of the attorney 10:55
15 A. No. 10:53	15 that you spoke to for Ms. Heard? 10:55
16 Q. So you have had subsequent text message 10:53	16 A. Richard Schwartz. 10:55
17 conversations with Ms. Heard this year? 10:53	17 Q. How many times did you speak with Richard 10:55
18 MS. BROOK: Objection. Misstates the 10:53	18 Schwartz? 10:55
19 testimony. 10:53	19 A. I don't remember. 10:55
20 THE WITNESS: I had conversations with her 10:53	20 Q. More than five? 10:55
21 after this conversation. 10:53	21 A. No. 10:55
22 BY MS. VASQUEZ: 10:53	22 Q. Less than five? 10:55
23 Q. Okay. 10:53	23 A. Around there. Or less, yeah. I don't 10:55
24 A. Text messaging. 10:53	24 remember specifically. 10:55
25 Q. Okay. What is the date of this 10:53	25 Q. Did you speak with him on the phone? 10:55
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1 conversation that you had with Ms. Heard? 10:53	1 A. Yes. 10:55
2 A. Well, it looks like it's Monday, 10:53	2 Q. Did you speak with him in person? 10:55
3 April 29th. 10:53	3 A. Yes. 10:55
4 Q. Is that your response [reading]: 10:53	4 Q. Okay. How many times did you meet with 10:55
5 "I'll call him back"? 10:54	5 Mr. Schwartz in person? 10:55
6 A. Yes. 10:54	6 A. Once. 10:55
7 Q. Okay. So is it your testimony that 10:54	7 Q. How long did your meeting last? 10:55
8 Ms. Heard texted you on or about April 29th of this 10:54	8 A. I don't remember. 10:55
9 year? 10:54	9 Q. An hour? 10:55
10 A. Yes. 10:54	10 A. Around. 10:55
11 Q. Okay. And in her text message she says 10:54	11 Q. Again, I'm entitled to your best 10:55
12 [reading]: 10:54	12 estimate -- 10:55
13 "Is it okay for my lawyer" -- "if my 10:54	13 A. Uh-huh. 10:55
14 lawyer," excuse me, "calls you to talk 10:54	14 Q. -- so when I ask you how much or how long, 10:55
15 to you just on the background? It be 10:54	15 please, do your best to -- 10:55
16 extremely helpful to me and wouldn't 10:54	16 A. Uh-huh. 10:55
17 jeopardize or compromise your anonymity 10:54	17 Q. -- answer my questions with your best 10:55
18 or privacy at all because it's my 10:54	18 estimate? 10:55
19 lawyers. He just needs some background 10:54	19 A. Uh-huh. Okay. 10:55
20 from other perspectives surrounding 10:54	20 Q. Okay. It will make this go a lot 10:56
21 certain events, like the one night you 10:54	21 faster -- 10:56
22 were there. Any and all information 10:54	22 A. Yeah. 10:56
23 that you could share with him would be 10:54	23 Q. -- if I don't have to ask each time. 10:56
24 extremely helpful. He needs as many 10:54	24 Who was with you at the meeting with 10:56
25 perspectives and details as possible. 10:54	25 Mr. Schwartz? 10:56
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1 A. Another woman on -- I guess -- I don't 10:56	1 A. Correct. 10:58
2 know who she was but she was there. She was 10:56	2 Q. You never received a copy for you to sign? 10:58
3 present. I don't know her name. 10:56	3 A. A final one. After I had done the edits. 10:58
4 Q. Does she work with Mr. Schwartz? 10:56	4 Q. Did you follow up with Mr. Schwartz or any 10:58
5 A. I am assuming. 10:56	5 of Ms. Heard's attorneys about signing a final 10:58
6 Q. What did you discuss with Mr. Schwartz? 10:56	6 version? 10:58
7 A. We discussed the events from a specific 10:56	7 A. No. 10:58
8 evening. He was asking me specific questions about 10:56	8 Q. Did Ms. Heard ever follow up with you 10:58
9 what I knew from the events from the evening that I 10:56	9 about signing a final version of the declaration? 10:58
10 was present for. 10:56	10 A. No. 10:58
11 Q. For... 10:56	11 Q. So your testimony today is that the only 10:58
12 A. For the night that they were wanting 10:56	12 time Ms. Heard has talked to you about this lawsuit 10:58
13 information on for this -- the certain events, 10:56	13 is in relation to this text message, which you 10:58
14 "surrounding certain events," the night that I was 10:56	14 produced and has been marked as Marz 2; is that your 10:59
15 present for one of the events. 10:56	15 testimony? 10:59
16 Q. When you say "Events" what are you 10:56	16 A. There was one other -- now that I am 10:59
17 referring to? 10:56	17 having this conversation -- 10:59
18 A. Right. A night where I was there when 10:56	18 Q. Uh-huh. 10:59
19 there was, you know, a situation between Johnny and 10:56	19 A. -- I am remembering there's one other 10:59
20 Amber. 10:57	20 moment where -- it was a very short conversation. 10:59
21 Q. When you say "there," where is there? 10:57	21 Q. Was it over the phone? 10:59
22 A. Means I was present -- I was present. 10:57	22 A. Yes. 10:59
23 Q. Where is there? 10:57	23 Q. Okay. And what did you talk about with 10:59
24 A. Oh. Sorry. 10:57	24 Ms. Heard? 10:59
25 Downtown at the Eastern Columbia building. 10:57	25 A. It was a moment when I was called with 10:59
Page 30	Page 32
1 Q. Do you know who owned the penthouse at the 10:57	1 Rick Schwartz and Amber to -- to talk about the 10:59
2 Eastern Columbia building? 10:57	2 signing of that declaration, is that what it is 10:59
3 A. I don't know, but I am assuming that 10:57	3 called? And yeah, so it was, like, a very brief 10:59
4 Johnny owned it. 10:57	4 conversation about it. 10:59
5 Q. What is your assumption based on? 10:57	5 And that was the only other time. 10:59
6 A. Based on the fact that he lived there for 10:57	6 Q. And what did you -- 10:59
7 some of the time, had his belongings there. 10:57	7 MS. BROOK: Move to strike. Hearsay. 10:59
8 Q. Did Mr. Schwartz draft a declaration for 10:57	8 MS. VASQUEZ: I don't think she actually 10:59
9 you to sign? 10:57	9, testified about any conversations that were had on 10:59
10 A. Yes. 10:57	10 that conversation, but that's fine. 10:59
11 MS. BROOK: Objection. Lack of 10:57	11 BY MS. VASQUEZ: 10:59
12 foundation. 10:57	12 Q. What did Ms. Heard say during that 10:59
13 BY MS. VASQUEZ: 10:57	13 telephone conference? 10:59
14 Q. Did you ever execute that declaration? 10:57	14 A. I don't remember specifically but it 11:00
15 A. No. 10:57	15 was -- you know, this situation happened a long time 11:00
16 Q. Is there a reason you didn't execute it? 10:57	16 ago, so trying to remember specific things is 11:00
17 A. I had -- I had sort of -- you know, 10:58	17 difficult for me. And there are some things I 11:00
18 obviously all this is very new to me in the terms of 10:58	18 really remember, and then there's some things that 11:00
19 signing a declaration and having these 10:58	19 are a little shady in my memory. 11:00
20 conversations, and so I was going through it to edit 10:58	20 So it was just a discussion of, you know, 11:00
21 it and to get it back to a place where I felt like, 10:58	21 whether or not I could receive a copy of my prior 11:00
22 okay, what I could really state and remember. And 10:58	22 testimony to see if that would refresh my memory 11:00
23 so I never received a final copy to sign. 10:58	23 about anything. And that was the extent of our 11:00
24 Q. From Ms. Heard's attorney, Mr. Schwartz; 10:58	24 conversation. 11:00
25 is that correct? 10:58	25 MS. BROOK: Same objection. 11:00
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1 BY MS. VASQUEZ:	11:00	1 Ms. Pennington that relate to the allegations	11:03
2 Q. And did Mr. Schwartz or Ms. Heard send you	11:00	2 Ms. Heard has made against Mr. Depp for domestic	11:03
3 your prior deposition testimony?	11:00	3 violence?	11:03
4 A. No.	11:00	4 A. Can you rephrase it?	11:03
5 Q. Have you ever e-mailed with Ms. Heard?	11:01	5 MS. VASQUEZ: Can you read back the	11:03
6 A. Yeah. But not -- yeah. Yeah. I guess	11:01	6 question, please.	11:03
7 so.	11:01	7 (The following record was read:	11:03
8 Q. Have you ever e-mailed about the	11:01	8 "QUESTION: Do you have any text	11:03
9 allegation she has made against Mr. Depp for	11:01	9 messages with Ms. Pennington that	11:03
10 domestic violence?	11:01	10 relate to the allegations Ms. Heard has	11:03
11 A. No.	11:01	11 made against Mr. Depp for domestic	11:03
12 Q. Have you ever texted with Ms. Heard about	11:01	12 violence?")	11:03
13 the allegations she has made against Mr. Depp for	11:01	13 THE WITNESS: Not that I remember. I	11:03
14 domestic violence?	11:01	14 don't remember.	11:03
15 A. No.	11:01	15 BY MS. VASQUEZ:	11:03
16 Q. How often, today, do you text with Raquel,	11:01	16 Q. Did you review your telephone and review	11:03
17 or Rocky, Pennington?	11:01	17 your text messages with Ms. Pennington --	11:03
18 A. I mean, I am going to say maybe once,	11:01	18 A. Uh-huh.	11:03
19 sometimes once a month, sometimes every two months.	11:01	19 Q. -- in preparation to provide documents in	11:03
20 Not very often.	11:02	20 response to the subpoena that was served on you?	11:03
21 Q. How long have you known Rocky Pennington?	11:02	21 A. Yes.	11:03
22 A. Since we were 14 or 15. So high school.	11:02	22 Q. Okay. And did any of those text messages	11:03
23 Q. Would you describe your friendship as best	11:02	23 reflect communications between you and	11:04
24 friends at some point?	11:02	24 Ms. Pennington relating to the allegations Ms. Heard	11:04
25 A. At some point, yeah.	11:02	25 has made against Mr. Depp for domestic violence?	11:04
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1 Q. At what point would you have described	11:02	1 A. The -- what I can remember is the last	11:04
2 your friendship as best friends?	11:02	2 thing was I just asked her if she was subpoenaed.	11:04
3 A. I mean, I don't -- I don't really use that	11:02	3 Q. And did she respond to you?	11:04
4 word "best friends" --	11:02	4 A. Yes.	11:04
5 Q. Okay.	11:02	5 Q. And what did she say?	11:04
6 A. -- with just like one person ever.	11:02	6 A. Yes.	11:04
7 Q. Okay.	11:02	7 Q. So it's your testimony that you have never	11:04
8 A. She is definitely someone who I have grown	11:02	8 communicated with Ms. Pennington via text message	11:04
9 up with and who knows me from when I was -- you	11:02	9 about any allegations Ms. Heard has made relating to	11:04
10 know, knows where I come from, I know where she	11:02	10 Mr. Depp abusing her?	11:04
11 comes from. So I would say there is definitely,	11:02	11 A. No.	11:04
12 like, a deep connection between us. But I wouldn't	11:02	12 Q. Okay. Have you communicated via e-mail	11:04
13 say she is my best, best friend.	11:02	13 with Ms. Pennington about allegations Ms. Heard has	11:04
14 Q. At any point would you have described her	11:02	14 made against Mr. Depp for domestic violence?	11:04
15 as your best friend?	11:02	15 A. No.	11:04
16 MS. BROOK: Objection. Asked and	11:02	16 Q. Have you spoken to Ms. Pennington on the	11:04
17 answered.	11:02	17 phone or in person about the allegations Ms. Heard	11:04
18 THE WITNESS: Maybe. I don't -- I don't	11:02	18 has made against Mr. Depp for domestic violence?	11:04
19 remember.	11:02	19 A. I have spoken her to about this situation.	11:04
20 BY MS. VASQUEZ:	11:02	20 I don't think I have spoken to her specifically	11:04
21 Q. Did something occur between you and	11:02	21 about Amber's accusations and what she's done or	11:04
22 Ms. Pennington that caused you to speak only once or	11:03	22 said.	11:05
23 maybe twice every other month?	11:03	23 Q. When you say "this situation" --	11:05
24 A. No.	11:03	24 A. More about like our -- our role in it.	11:05
25 Q. Do you have any text messages with	11:03	25 Q. When you say "our role," who are you	11:05
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10 (Pages 34 - 37)

1 referring to? 11:05	1 A. I was in the cosmetics business. So I 11:07
2 A. My specific -- the things that I -- like 11:05	2 worked for a company that essentially represented 11:07
3 my specific connection to this -- to this case. 11:05	3 big makeup brands -- like smaller and bigger makeup 11:07
4 Q. Okay. And what have you discussed with 11:05	4 brands, but we were kind of the middle man between 11:07
5 her specifically? 11:05	5 big -- you know, the brands and the retail stores 11:07
6 A. You know, just -- that we are involved in 11:05	6 which they -- you know, sales essentially. So it 11:07
7 some way, shape, or form and how we have been 11:05	7 was... 11:07
8 reached out to and whether or not lawyers have 11:05	8 Q. Are you also a makeup artist? 11:07
9 reached out to us. Yeah, I mean, basically just -- 11:05	9 A. I'm not practicing anymore, but I used to 11:07
10 that's -- I think that's it. 11:05	10 be a makeup artist. 11:07
11 Q. Okay. So you haven't spoken with 11:05	11 Q. Did you ever do Ms. Heard's makeup? 11:07
12 Ms. Pennington about -- specifically about the 11:05	12 A. No. 11:07
13 allegations of abuse that Ms. Heard has alleged 11:05	13 Q. Did you ever do Ms. Pennington's makeup? 11:07
14 against Mr. Depp? 11:05	14 A. Yeah. 11:07
15 A. Not that I remember. But maybe in the 11:05	15 Q. Did you ever teach Ms. Pennington how to 11:07
16 past. But not that I remember or any time recently. 11:05	16 do makeup? 11:07
17 Q. Would reviewing your text messages or 11:06	17 A. I don't think so. I don't remember. 11:07
18 e-mails with Ms. Pennington refresh your 11:06	18 Q. When did you first meet Amber Heard? 11:07
19 recollection as to whether those conversations -- 11:06	19 A. The summer -- so it was the summer after 11:07
20 whether in text form, or e-mail form, or over the 11:06	20 my freshman year of college. So I don't know 11:08
21 phone have taken place? 11:06	21 specifically what year that was. 11:08
22 A. I did review and there was nothing there 11:06	22 Q. Do you remember what year you graduated 11:08
23 that refreshed any memory, so I can't remember 11:06	23 college? 11:08
24 specific conversations. But I can say that there 11:06	24 A. I graduated in -- so I graduated college 11:08
25 were no text messages or e-mails related to any of 11:06	25 2007, and I met her the summer after my freshman 11:08
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1 it. 11:06	1 year of college. 11:08
2 Q. Let's talk a little bit about you. 11:06	2 Q. So some time maybe in 2003? 11:08
3 What is your education level after high 11:06	3 A. 2003 or 2004. 11:08
4 school? 11:06	4 Q. And how did you meet Ms. Heard? 11:08
5 A. I went to college. I have a bachelor's, 11:06	5 A. At -- we overlapped a little bit at -- I 11:08
6 four years under- -- you know, undergrad. 11:06	6 worked at a store in Austin that summer that I had 11:08
7 Q. Where did you go to college? 11:06	7 got -- you know, and so I met her there, originally, 11:08
8 A. Indiana University. 11:06	8 in that store. 11:08
9 Q. And what did you receive your bachelor's 11:06	9 Q. You were working in the store -- was it a 11:08
10 in? 11:06	10 retail space? 11:08
11 A. It was, like, general studies with, you 11:06	11 A. Uh-huh. 11:08
12 know, a minor in business, I would say, or apparel, 11:06	12 Q. And she came in as a customer? 11:08
13 fashion, merchandising. I actually don't remember, 11:06	13 A. No. She was working there. 11:08
14 but... 11:06	14 Q. Is this when Ms. Heard was still living in 11:08
15 Q. And what do you do for a living? 11:06	15 Texas? 11:08
16 A. I'm a life coach. 11:06	16 A. Uh-huh. 11:08
17 Q. Okay. Do I understand you correctly that 11:06	17 Q. So you didn't meet Ms. Heard through 11:08
18 you work for yourself? 11:06	18 Ms. Pennington; is that correct? 11:09
19 A. Yes. 11:06	19 A. I mean, I -- I essentially did -- Raquel 11:09
20 Q. Okay. And how long have you been a life 11:07	20 got me the job there, and it was, like, introduced 11:09
21 coach? 11:07	21 as "This is" -- we were introduced through Raquel, 11:09
22 A. About a little over a year. Less than a 11:07	22 but we had one day where we worked in the store 11:09
23 year and a half, over a year. 11:07	23 together and I -- I think that was the first time I 11:09
24 Q. What did you do before working as a life 11:07	24 ever like met her, met her. 11:09
25 coach? 11:07	25 But our connection is through Raquel, I 11:09
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1	would say.	11:09	1	that phone when you purchased it?	11:26
2	Q. Do you currently live alone?	11:09	2	A. I don't remember. I think some of the --	11:27
3	A. Yeah.	11:09	3	some of my photos were transferred over. But even	11:27
4	THE WITNESS: Actually, I have to use the	11:09	4	the phone previous to that was not the phone -- was	11:27
5	restroom. I don't know how to --	11:09	5	still not the phone -- I've gotten probably - I	11:27
6	BY MS. VASQUEZ:	11:09	6	don't specifically remember - but maybe at least two	11:27
7	Q. Sure. Yeah.	11:09	7	phones since that time period in my life.	11:27
8	MS. VASQUEZ: Let's take a break.	11:09	8	Q. Okay.	11:27
9	THE WITNESS: Okay. Thank you.	11:09	9	A. So...	11:27
10	THE VIDEOGRAPHER: Going off the record at	11:09	10	Q. Got it.	11:27
11	11:10 a.m.	11:09	11	And I know we just took a break?	11:27
12	(Brief recess.)	11:21	12	A. Uh-huh.	11:27
13	THE VIDEOGRAPHER: Going back on the	11:25	13	Q. Did you meet with anyone besides your	11:27
14	record at 11:25 a.m.	11:25	14	attorney during that break?	11:27
15	MS. GOLDSTEIN: Mr. Vasquez.	11:25	15	A. No.	11:27
16	MS. VASQUEZ: Yeah.	11:25	16	Q. Okay. To my left is Davida Brooks	11:27
17	MS. GOLDSTEIN: There was one thing that	11:25	17	[verbatim] and she represents Ms. Heard. Have you	11:27
18	the witness wanted to clarify about your earlier	11:25	18	ever met Davida?	11:27
19	testimony.	11:25	19	A. No.	11:27
20	MS. VASQUEZ: Okay. Sure.	11:25	20	Q. Before today, you never met her?	11:27
21	THE WITNESS: So my phone that I currently	11:25	21	A. Not before today.	11:27
22	have since 2013, 2012, I have two phones since that	11:25	22	Q. Okay. And you testified earlier that	11:27
23	phone. So my text messages actually, I wanted to	11:25	23	Ms. Heard is paying for your attorney; is that	11:27
24	clarify, don't go back as far as 2016 or even I -- I	11:25	24	correct?	11:27
25	mean, I don't specifically remember even 2017. So I	11:25	25	A. Yes.	11:27
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1	don't even have access to these text messages from	11:25	1	Q. Okay. How did you come to learn that	11:27
2	that far back.	11:25	2	Ms. Heard was going to pay for your attorney?	11:27
3	So I just wanted to make that clear. I	11:25	3	A. Through -- through -- when I was offered	11:27
4	provided all -- everything I had on my phone, but	11:26	4	to, you know, chose to work with lawyers, and I said	11:27
5	there could have been text messages that I actually	11:26	5	yes. There was --	11:28
6	just don't have access to because I got a new phone.	11:26	6	Q. Who --	11:28
7	BY MS. VASQUEZ:	11:26	7	A. There was a series of documents I had to	11:28
8	Q. Thank you for clarifying that.	11:26	8	sign off on to -- to say that I wanted to have my	11:28
9	Ms. Marz, is it your testimony that you do	11:26	9	own lawyer. And I think that's how I found -- I	11:28
10	not backup your iPhones to the cloud?	11:26	10	think that's how I found out.	11:28
11	A. I think I do now. But I don't remember if	11:26	11	Q. Okay. Let's unpackage that a little bit.	11:28
12	I did then. I mean, I did everything I could to try	11:26	12	A. Right.	11:28
13	to find text messages -- text messages from that	11:26	13	Q. Who offered you an attorney?	11:28
14	time. So I guess not. I guess I didn't make it up	11:26	14	MS. GOLDSTEIN: And I know this is	11:28
15	at that point.	11:26	15	difficult, but I'm going to caution you, do not	11:28
16	Q. Okay. Do you remember when you started	11:26	16	disclose communications you and I had --	11:28
17	backing up your iPhone?	11:26	17	THE WITNESS: Uh-huh.	11:28
18	A. I don't remember.	11:26	18	MS. GOLDSTEIN: -- but if there are	11:28
19	Q. Okay. The phone -- when did you purchase	11:26	19	communications with other people about who is paying	11:28
20	this phone that you currently have?	11:26	20	for your lawyer.	11:28
21	A. I don't remember.	11:26	21	THE WITNESS: Uh-huh.	11:28
22	Q. Within the last year?	11:26	22	MS. GOLDSTEIN: That is fair game.	11:28
23	A. I don't remember.	11:26	23	THE WITNESS: Uh-huh. Yeah.	11:28
24	Q. When you purchased that phone, did you put	11:26	24	Oh, I think -- one of Amber's lawyers	11:28
25	a backup of that -- of the iCloud information on to	11:26	25	reached out to me.	11:28
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1 BY MS. VASQUEZ:	11:28	1 MS. BROOK: Object to the form.	11:30
2 Q. Do you remember who?	11:28	2 THE WITNESS: You want me to answer the	11:30
3 A. I think she goes by Robbie. I think --	11:28	3 question -- is that --	11:30
4 Q. Robbie Kaplan?	11:28	4 BY MS. VASQUEZ:	11:30
5 A. Yes.	11:28	5 Q. Uh-huh.	11:30
6 Q. Okay. When did you speak to Robbie	11:28	6 A. Okay. Yes. I think she -- from what I	11:30
7 Kaplan?	11:28	7 remember, she was the link between me and my lawyer.	11:30
8 A. I don't remember the specific date.	11:28	8 Q. So she introduced you, "she" meaning	11:30
9 Q. Within the last year?	11:28	9 Ms. Kaplan introduced you to your attorney	11:30
10 A. Yes.	11:28	10 Ms. Goldstein; is that correct?	11:30
11 Q. Within the last six months?	11:28	11 A. Uh-huh. Yes.	11:30
12 A. Yes.	11:28	12 Q. Okay. And just to put something on the	11:30
13 Q. Okay. Within the last three months?	11:28	13 record, at times you may hear your attorney or	11:30
14 A. Yeah.	11:28	14 Ms. Brooks [verbatim] make an objection; please	11:30
15 Q. Okay. Was it after you received the	11:28	15 ignore them unless your attorney instructs you not	11:30
16 subpoena for your deposition?	11:28	16 to answer a question of mine.	11:30
17 A. Yes.	11:29	17 A. Uh-huh.	11:30
18 Q. You sure about that?	11:29	18 Q. Okay.	11:30
19 A. I'm pretty sure. Yes.	11:29	19 MS. BROOK: And Ms. Vasquez, it's Ms.	11:30
20 Q. Okay. Did Ms. Kaplan reach out to you?	11:29	20 Brook, there is no "s."	11:31
21 A. Yes.	11:29	21 MS. VASQUEZ: I apologize, Ms. Brook.	11:31
22 Q. Did Amber make an introduction to	11:29	22 MS. BROOK: No worries.	11:31
23 Ms. Kaplan?	11:29	23 BY MS. VASQUEZ:	11:31
24 A. No.	11:29	24 Q. Did Ms. Kaplan talk to you about the	11:31
25 Q. So it was a cold call from Roberta Kaplan;	11:29	25 document requests that were served on you in	11:31
Page 46		Page 48	
1 is that correct?	11:29	1 relation to the subpoena?	11:31
2 A. Uh-huh. Yes.	11:29	2 A. Not that I remember.	11:31
3 Q. How long did you speak to Ms. Kaplan?	11:29	3 Q. Okay. Did you ask her any questions about	11:31
4 A. It was pretty brief. I don't remember the	11:29	4 the document requests?	11:31
5 specific amount of time.	11:29	5 A. No, not that I remember.	11:31
6 Q. And what did she say to you?	11:29	6 Q. So to summarize your phone call with	11:31
7 A. I don't remember specifically. Just	11:29	7 Ms. Kaplan -- was it one phone call, by the way?	11:31
8 introducing herself.	11:29	8 A. It was one phone call.	11:31
9 Q. And how did she introduce herself to you?	11:29	9 Q. Okay. Did you exchange any e-mails with	11:31
10 A. By her name. That she was working on the	11:29	10 Ms. Kaplan?	11:31
11 case. And that's all I really remember.	11:29	11 A. I think so.	11:31
12 Q. Did she tell you that she represented	11:29	12 Q. Is there a reason you didn't produce those	11:31
13 Ms. Heard?	11:29	13 e-mails to us today?	11:31
14 A. Something of that nature. That it was	11:29	14 A. I mean, I think I produced everything -- I	11:31
15 clear that she was on Ms. Heard's side of things,	11:29	15 gave my lawyer everything that I had that was -- so	11:31
16 but I don't remember specifically how she said she	11:29	16 if I didn't produce it, it means there wasn't -- I	11:31
17 was -- yeah, I don't remember the specifics of it.	11:29	17 don't remember.	11:31
18 Q. Did she offer to represent you in this	11:29	18 Q. Would reviewing your e-mail refresh your	11:31
19 litigation?	11:29	19 recollection as to whether Ms. Kaplan and you	11:31
20 A. Not that I remember.	11:30	20 exchanged e-mails?	11:32
21 Q. Did she provide you any paperwork for you	11:30	21 A. Uh-huh. Yes.	11:32
22 to sign to be represented by an attorney?	11:30	22 Q. Okay. And you understand that a document	11:32
23 A. Not that I remember.	11:30	23 request requires you to review your e-mails and your	11:32
24 Q. Did she refer you to your current	11:30	24 files, text messages, phone records, et cetera, to	11:32
25 attorney, Ms. Goldstein?	11:30	25 see if you have any responsive documents?	11:32
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1	A. Yes.	11:32	1	Q. Okay. How did you first meet Mr. Depp?	11:34	
2	Q. You understand that?	11:32	2	A. Through Amber.	11:34	
3	A. Yes.	11:32	3	Q. Do you recall where you were when you	11:34	
4	Q. Okay. And it's your testimony today that	11:32	4	first met Mr. Depp?	11:34	
5	you did do that, and you did not find any e-mail	11:32	5	A. At the Bowery Hotel in New York.	11:34	
6	communications between you and Ms. Kaplan?	11:32	6	Q. Were you there on vacation?	11:34	
7	A. I did do that and I -- I don't remember if	11:32	7	A. No.	11:34	
8	I found any. And if I did, I would have passed	11:32	8	Q. Did you live in New York at the time?	11:34	
9	it -- everything I did find, I passed it over to my	11:32	9	A. Yes.	11:34	
10	lawyer.	11:32	10	Q. And the purpose of the meeting with	11:34	
11	Q. Okay.	11:32	11	Mr. Depp was to meet Mr. Depp?	11:34	
12	MS. GOLDSTEIN: And Ms. Vasquez, for the	11:32	12	A. Yeah. And to see Amber.	11:34	
13	record, I am happy to discuss the document	11:32	13	Q. Okay. Did you have dinner with Mr. Depp	11:34	
14	production with you at any time.	11:32	14	and Amber?	11:34	
15	MS. VASQUEZ: Okay.	11:32	15	A. No.	11:34	
16	BY MS. VASQUEZ:	11:32	16	Q. Tell me the circumstances by which you met	11:34	
17	Q. Do you recall producing any document -- or	11:32	17	him. Obviously, it happened in New York at the	11:34	
18	passing them to your -- any -- let me start over.	11:32	18	Bowery Hotel; what were the circumstances of meeting	11:34	
19	Do you recall finding and giving your	11:32	19	him?	11:34	
20	attorney any documents or communications between you	11:32	20	A. Just Amber and Johnny were in town, and I	11:34	
21	and any of Ms. Heard's attorneys, including Roberta	11:32	21	went over there just to see -- to just hang out. I	11:34	
22	Kaplan?	11:32	22	think we had a glass of wine. My boyfriend at the	11:34	
23	MS. BROOK: Objection. The witness has	11:32	23	time came, so it was just the four of us. And it	11:35	
24	already testified that she produced and handed over	11:32	24	was just cool. Like I was excited to meet Johnny	11:35	
25	documents with Ms. Heard's former attorney,	11:33	25	and see Amber.	11:35	
Page 50			Page 52			
1	Mr. Schwartz.	11:33	1	Q. Do you recall what Amber had told you	11:35	
2	THE WITNESS: Yes. I -- you know,	11:33	2	about Johnny at the time?	11:35	
3	there -- it could have been that there was an e-mail	11:33	3	A. No.	11:35	
4	chain between my lawyer and someone else that she	11:33	4	Q. Were they boyfriend and girlfriend at the	11:35	
5	would have had that I didn't produce for some	11:33	5	time, Johnny and Amber?	11:35	
6	reason. I don't remember.	11:33	6	A. Yeah. I think so. Yeah.	11:35	
7	BY MS. VASQUEZ:	11:33	7	Q. Did she describe their relationship to you	11:35	
8	Q. Okay. But you don't --	11:33	8	in any way, prior to you meeting him?	11:35	
9	A. But I passed over everything that I could	11:33	9	A. No.	11:35	
10	find that was in relation to this to my lawyer.	11:33	10	Q. You testified you were excited to meet	11:35	
11	Q. Okay. And to confirm, Ms. Kaplan has	11:33	11	him?	11:35	
12	never represented you; is that correct?	11:33	12	A. Well --	11:35	
13	A. Correct.	11:33	13	Q. Is there a reason you were excited to meet	11:35	
14	Q. And she is not representing you in this	11:33	14	Mr. Depp?	11:35	
15	lawsuit?	11:33	15	A. Yeah. Because he's Johnny Depp, and I was	11:35	
16	A. Correct.	11:33	16	a fan of his work and so -- celebrity.	11:35	
17	Q. Okay. Do you recall the first time you	11:33	17	Q. Okay. Can you estimate for me how many	11:35	F/A, SP, Lack of
18	met Mr. Depp?	11:33	18	times you spent time with Johnny Depp?	11:35	Pers. Know., Vague/Ambig.
19	A. Yes.	11:33	19	MS. BROOK: Objection. Form.	11:35	
20	Q. When was that?	11:33	20	THE WITNESS: Are you asking me how many	11:35	F/A, SP, Lack of
21	A. I don't remember the year.	11:33	21	times I spent time with him for elongated time or	11:35	Pers. Know.,
22	Q. In the last five years?	11:33	22	just in his presence?	11:36	Vague/Ambig.
23	A. No.	11:33	23	BY MS. VASQUEZ:	11:36	
24	Q. Ten?	11:33	24	Q. Any time? In his presence?	11:36	F/A, SP, Lack of Pers.
25	A. Around that.	11:34	25	MS. BROOK: Same objection.	11:36	Know., Vague/Ambig.
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14 (Pages 50 - 53)

F/A, SP, Lack of
Pers. Know.

1 THE WITNESS: I think just three or four 11:36
2 times -- four times. Three or four times. I think. 11:36
3 BY MS. VASQUEZ: 11:36
4 Q. What year did you live in New York -- what 11:36
5 years? 11:36
6 A. It was, I think, 2007 or 2008 up until 11:36
7 2015, '16, '15. 11:36
8 Q. And you lived in New York full-time? 11:36
9 A. Yeah. 11:36

F/A, SP, Lack of
Pers. Know.

10 Q. Between the time that you lived in New 11:36
11 York so, let's say, 2007, 2008 through 2015, 2016? 11:36
12 A. Uh-huh. 11:36
13 Q. How many times would you estimate that you 11:36
14 saw Ms. Heard? 11:36
15 A. I don't remember. 11:37
16 Q. More than four times? 11:37
17 A. No. 11:37

18 Q. Is it fair to say while you were living in 11:37
19 New York, you saw Ms. Heard the same number of times 11:37
20 that you saw Mr. Depp? 11:37
21 A. No. 11:37
22 Q. You saw Ms. Heard more? 11:37
23 A. Yes. 11:37
24 Q. Significantly more times? 11:37
25 MS. BROOK: Objection. Vague. 11:37

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1 THE WITNESS: A little bit more. 11:37
2 BY MS. VASQUEZ: 11:37
3 Q. Okay. When you saw Ms. Heard, let's say, 11:37
4 between 2007 and 2016, on the long end -- 11:37
5 A. Uh-huh. 11:37
6 Q. -- did she ever talk to you about her 11:37
7 relationship with Mr. Depp? 11:37
8 A. I don't remember. 11:37
9 Q. Would you agree with me that if Ms. Heard 11:37
10 had mentioned something significant to you about her 11:37
11 relationship with Mr. Depp, you would remember that 11:37
12 conversation? 11:37

13 MS. BROOK: Objection. -- object to the 11:37
14 form. 11:37
15 THE WITNESS: I mean, they were together, 11:37
16 right, so -- I think -- that was -- she was -- I 11:38
17 don't remember if there was anything, like, specific 11:38
18 that she said to me so... 11:38
19 BY MS. VASQUEZ: 11:38
20 Q. How about significant? 11:38
21 A. Not that I remember. 11:38
22 Q. Okay. For example, if Ms. Heard had told 11:38
23 you that Johnny Depp regularly abused her, would you 11:38
24 remember that? 11:38
25 MS. BROOK: Objection. Lacks foundation. 11:38

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1 THE WITNESS: Yeah. 11:38
2 BY MS. VASQUEZ: 11:38
3 Q. Okay. So is it your testimony that 11:38
4 Ms. Heard never told you between 2007 and 2015, 11:38
5 let's say, that Mr. Depp was physically abusive 11:38
6 towards her? 11:38
7 A. No. 11:38
8 Q. She never told you that; is that correct? 11:38
9 A. No -- that's correct. 11:38
10 Q. Okay. Are you and Ms. Pennington still 11:38
11 friends today? 11:38
12 A. Yeah. 11:38
13 Q. And I believe you testified earlier, and 11:38
14 please feel free to correct me, that the last time 11:39
15 you spoke to Ms. Pennington was a month ago? 11:39
16 A. I text -- we texted within the month. And 11:39
17 I have seen her maybe within that time frame or a 11:39
18 little bit more once. 11:39
19 Q. Okay. Did you speak with Ms. Pennington 11:39
20 about this lawsuit specifically when you saw her 11:39
21 last? 11:39
22 A. No. 11:39
23 Q. Did you text with Ms. Pennington about 11:39
24 this lawsuit specifically, last time you texted with 11:39
25 her? 11:39

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1 A. The last time I texted with her is when I 11:39
2 asked her "Are you subpoenaed?" And she said "Yes." 11:39
3 And that was the last time we spoke or texted. 11:39
4 Q. Okay. Who is Josh Drew? 11:39
5 A. That is Raquel's ex-husband. 11:39
6 Q. When was the last time you spoke with 11:39
7 Josh? 11:39
8 A. I don't remember. I don't remember. 11:39
9 Q. Has it been years? 11:39
10 A. I don't remember the specific -- I guess 11:39
11 so. I mean, they have been -- for as long as they 11:39
12 have been divorced, so I don't know. 11:39
13 Q. Do you know how long they have been 11:40
14 divorced? 11:40
15 A. I don't know. 11:40
16 Q. Do you know the cause of their divorce? 11:40
17 A. I don't specifically know, but -- I -- I 11:40
18 don't know. 11:40
19 Q. Are you aware that Ms. Pennington had an 11:40
20 affair? 11:40
21 A. Yes. 11:40
22 Q. Okay. Were you aware while Ms. Pennington 11:40
23 was married to Josh Drew that she was having an 11:40
24 affair? 11:40
25 A. I found out after. 11:40

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15 (Pages 54 - 57)

1 Q. When is after? 11:40
2 A. After she had the affair. 11:40
3 Q. How long after she had the affair did you 11:40
4 find out? 11:40
5 A. When she -- I guess soon -- like soon 11:40
6 after -- maybe, I don't know, I would within -- I 11:40
7 would say within a month after. 11:40
8 Q. And when you say you found out after she 11:40
9 had the affair? 11:40
10 A. Uh-huh. 11:40
11 Q. She married the person she had the affair 11:40
12 with; is that correct? 11:40
13 A. Yes. 11:40
14 Q. Okay. So when you say you found out after 11:40
15 she had the affair, you mean one month, 11:40
16 approximately, after she started the affair? 11:41
17 A. Exactly. 11:41
18 Q. Okay. 11:41
19 A. I think around then. 11:41
20 Q. And she was still married to Josh, 11:41
21 correct? 11:41
22 A. When I found out? 11:41
23 Q. When you found out? 11:41
24 A. She -- yes. 11:41
25 Q. Okay. Did you consider Josh a friend of 11:41

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1 yours? 11:41
2 A. No. 11:41
3 Q. Okay. Have you ever spoken to Ms. Drew or 11:41
4 Josh about this lawsuit? 11:41
5 A. No. 11:41
6 Q. Okay. Have you ever spoken to Mr. Drew 11:41
7 about the allegations Ms. Heard has made against 11:41
8 Mr. Depp for domestic violence? 11:41
9 A. Not that I remember. 11:41
10 Q. Okay. Do you recall Ms. Pennington ever 11:41
11 discussing with you Mr. Depp -- sorry -- strike 11:41
12 that. 11:41
13 Do you recall Ms. Pennington ever 11:41
14 discussing with you Ms. Heard and Mr. Depp's 11:41
15 relationship? 11:41
16 MS. BROOK: Objection. Form. 11:41
17 THE WITNESS: So have I ever heard -- has 11:41
18 she ever discussed with me their relationship -- 11:42
19 anything about their relationship? 11:42
20 BY MS. VASQUEZ: 11:42
21 Q. Uh-huh? 11:42
22 A. Yes. 11:42
23 Q. Okay. When was the first time that 11:42
24 Ms. Pennington, that you remember, talked to you 11:42
25 about Johnny and Amber's relationship? 11:42

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1 MS. BROOK: Object to the form. 11:42
2 THE WITNESS: First time I heard her talk 11:42
3 about their relationship, it was -- I mean, I am 11:42
4 assuming it was around the time they met, 11:42
5 originally. 11:42
6 BY MS. VASQUEZ: 11:42
7 Q. Uh-huh. 11:42
8 A. When they were filming a movie together, 11:42
9 she just said that they were filming and they had 11:42
10 met, that was the first time I heard about their 11:42
11 relationship. 11:42

12 Q. How would you describe Ms. Pennington's 11:42
13 descriptions over the years of her relationship -- 11:42
14 of Johnny's relationship with Amber? 11:42

H, R, F/A, SP,
Lack of Pers.
Know.

15 MS. BROOK: Objection. Calls for hearsay. 11:42
16 THE WITNESS: That's a good question. I 11:42
17 mean, there's -- it's been a long span. I think 11:42
18 they have been together in a long span of my 11:42
19 relationship with Raquel, so I don't specifically 11:42
20 remember, you know, details. But there's been a lot 11:43
21 of -- you know, there's been -- I don't specifically 11:43
22 remember details, but I have definitely been hearing 11:43
23 about their relationship. 11:43

H, R, F/A, SP,
Lack of Pers.
Know.

24 BY MS. VASQUEZ: 11:43

25 Q. Okay. But isn't it true, Ms. Marz, that 11:43

H, R, F/A, SP, Lack
Page 60 of Pers. Know.

1 Ms. Pennington never told you that Mr. Depp had been 11:43
2 abusive towards Amber until May 21st, 2016? 11:43

H, F/A, SP,
Lack of Pers. Know.

3 MS. BROOK: Objection. Form. 11:43
4 THE WITNESS: So I -- I don't remember 11:43
5 specifically when I found out that there was abuse 11:43
6 happening. I don't remember -- I know I read over 11:43
7 my previous testimony, and I know that I said no and 11:43
8 then -- as I am, like, thinking back I'm, like, I am 11:43
9 confused about what I read in the press versus what 11:43
10 I actually heard and when. So the specific timeline 11:43
11 of things is a little foggy for me. 11:43

H, F/A, SP,
Lack of Pers.
Know.

12 BY MS. VASQUEZ: 11:43

13 Q. Right. But you would agree -- 11:43

14 A. Because it's been many years. 11:43

H, F/A, SP, Lack Pers. Know.

15 Q. Right. But you would agree with me that 11:43
16 there was nothing in the press until Ms. Heard filed 11:43
17 for divorce and filed for temporary restraining 11:43
18 order; is that correct? 11:43
19 MS. BROOK: Objection. Lacks foundation. 11:43
20 THE WITNESS: There was nothing in the 11:43
21 press, yeah, I -- from my knowledge, I didn't -- I 11:44
22 hadn't experienced anything in the press about this 11:44
23 before, before. Yeah. 11:44
24 BY MS. VASQUEZ: 11:44

25 Q. Before she filed for divorce, correct? 11:44

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16 (Pages 58 - 61)

1	A. I think so.	11:44	1	Q. Okay. But you would agree with me having	11:45	
2	Q. Right.	11:44	2	issues or even fighting --	11:46	
3	A. I don't know when she filed for divorce.	11:44	3	A. Uh-huh.	11:46	
4	I don't know -- I don't know when things came out.	11:44	4	Q. -- to use your words, is different than a	11:46	
5	I don't know the specific dates of things.	11:44	5	man beating his wife?	11:46	
6	Q. Okay. And you would agree with me that	11:44	6	A. Uh-huh.	11:46	
7	you would have remembered something as significant	11:44	7	Q. Correct?	11:46	
8	as your friend, Ms. Pennington, telling you that	11:44	8	A. Correct.	11:46	
9	your other mutual friend, Ms. Heard, was in an	11:44	9	Q. Okay. So you would remember if	11:46	H, F/A, SP,
10	abusive relationship?	11:44	10	Ms. Pennington told you that Johnny Depp had struck	11:46	Lack of Pers.
11	You would remember that, correct?	11:44	11	Ms. Heard before May 21st, 2016?	11:46	Know.
12	A. Yes. Yes.	11:44	12	A. And I --	11:46	
13	MS. BROOK: Object --	11:44	13	Q. You would have remembered that?	11:46	
14	BY MS. VASQUEZ:	11:44	14	A. I don't know.	11:46	
15	Q. Okay. And you don't recall Ms. Pennington	11:44	15	MS. BROOK: Objection. Form.	11:46	
16	ever telling you that Ms. Heard was being abused by	11:44	16	THE WITNESS: Honestly, I don't know,	11:46	H, F/A, SP,
17	Johnny Depp?	11:44	17	It's been so many years and so many conversations	11:46	Lack
18	MS. BROOK: Objection.	11:44	18	that I actually don't know the answer to that. I	11:46	of Pers. Know.
19	Let me get my objection in. I'm sorry.	11:44	19	could have been told that before, or it could have	11:46	
20	Objection. Misstates testimony. Calls	11:44	20	been after, but I actually don't remember.	11:46	
21	for -- I'm sorry, misstates the testimony. Lack of	11:44	21	BY MS. VASQUEZ:	11:46	
22	foundation and form.	11:44	22	Q. I'm not asking you -- thank you for your	11:46	
23	MS. GOLDSTEIN: I'll join that it	11:44	23	answer.	11:46	
24	misstates the testimony. Objection.	11:44	24	I'm not asking you if you were told; I'm	11:46	
25	THE WITNESS: Sorry. Can you ask the	11:44	25	asking would you remember? You would agree with me	11:46	
Page 62			Page 64			
1	question again?	11:44	1	that --	11:46	
2	MS. VASQUEZ: Do you mind reading back the	11:44	2	A. I don't know. That's the truth. I don't	11:46	
3	question. Thank you.	11:44	3	know if I would remember.	11:46	
4	(The following record was read:	11:45	4	Q. Do you have a lot of friends that are in	11:46	
5	"QUESTION: And you don't recall	11:44	5	abusive relationships?	11:46	
6	Ms. Pennington ever telling you that	11:44	6	A. No.	11:46	
7	Ms. Heard was being abused by Johnny	11:44	7	Q. Okay. Would you agree that this is	11:46	
8	Depp?")	11:44	8	probably the first friend that's been in an abusive	11:46	
9	THE WITNESS: So she told me about some	11:45	9	relationship in your life?	11:46	
10	situations between the two of them, but I don't	11:45	10	MS. BROOK: Objection. Lack of foundation	11:46	
11	specifically remember to what extent. It felt -- I	11:45	11	personal knowledge, and just argumentative.	11:47	
12	know that they were fighting and that was what I had	11:45	12	THE WITNESS: I'm trying to think if I had	11:47	
13	heard. I didn't -- I don't remember if I knew to	11:45	13	any other friends in abusive relationships. I don't	11:47	
14	what extent things were going -- what was really	11:45	14	know. I don't think I have had that many, and if I	11:47	
15	going on. I wasn't -- yeah, I don't remember to	11:45	15	have, I can't think of the person in this moment.	11:47	
16	what extent.	11:45	16	BY MS. VASQUEZ:	11:47	
17	BY MS. VASQUEZ:	11:45	17	Q. Okay. In 2015 and 2016, do you recall how	11:47	
18	Q. Okay. So you recall Ms. Pennington,	11:45	18	close you and Ms. Pennington were as friends?	11:47	
19	before May 21st, 2016, telling you that Amber and	11:45	19	A. Yeah. We were pretty close. Pretty	11:47	
20	Johnny were quote "fighting"?	11:45	20	close. Yeah.	11:47	
21	A. Again, yeah, yes. There was -- yes, I --	11:45	21	Q. Uh-huh. How often would you communicate?	11:47	
22	I don't remember knowing. I don't remember how I	11:45	22	A. I don't remember specifics about the	11:47	
23	knew or in what the context was of me finding out,	11:45	23	frequency of our communication.	11:47	
24	but I knew there was -- they were having issues in	11:45	24	Q. Is it safe to assume that if you were	11:47	
25	their relationship.	11:45	25	close friends during that time period, you would	11:47	
Page 63			Page 65			

H, F/A, SP, Lack of Pers. Know.

H, F/A, SP, Lack of Pers. Know.

	1 communicate weekly? 11:48	1 A. -- and then there were moments where there 11:50
	2 MS. BROOK: Objection. Lacks foundation, 11:48	2 was larger gaps in our communication. 11:50
	3 personal knowledge. She already said she didn't 11:48	3 Q. Okay. Would reviewing your deposition 11:50
	4 know. 11:48	4 transcript from the divorce case in July of 2016 11:50
	5 THE WITNESS: We didn't communicate 11:48	5 refresh your recollection as to how often you would 11:50
	6 weekly. 11:48	6 communicate with Ms. Pennington? 11:50
	7 BY MS. VASQUEZ: 11:48	7 A. I don't know. I don't know if it was 11:50
	8 Q. Would you communicate with Raquel in 2015 11:48	8 written -- I don't -- I don't know. 11:50
	9 and '16 more frequently than weekly? Was it every 11:48	9 Q. Let's show it to you. 11:50
	10 day? Every other day? 11:48	10 I'm going to ask you, Ms. Marz, to keep 11:50
	11 MS. BROOK: Same objections. 11:48	11 this handy because we're probably going to be 11:50
	12 THE WITNESS: No. 11:48	12 referring to this often. 11:50
	13 BY MS. VASQUEZ: 11:48	13 MS. VASQUEZ: I'm sorry. Counsel, I don't 11:50
F/A, SP, Lack of Pers. Know.	14 Q. So is it your testimony that throughout 11:48	14 have a lot of copies of this; do you mind reading 11:50
	15 your friendship with Raquel, Ms. Pennington, you 11:48	15 over her shoulder? 11:50
	16 only communicated with her once a month, once every 11:48	16 MS. GOLDSTEIN: No problem. 11:50
	17 two months? 11:48	17 THE REPORTER: Exhibit 3. 11:50
	18 A. I mean, there was fluctuations, like -- 11:48	18 (Deposition Exhibit 3 was marked for 11:50
	19 but when I was living -- yeah, I mean, fluctuations, 11:48	19 identification and is attached hereto.) 11:50
	20 And I mean, sometimes it was once every two months, 11:48	20 MS. VASQUEZ: Thank you. 11:50
	21 sometimes once every six months and then maybe in 11:49	21 BY MS. VASQUEZ: 11:50
	22 certain situations where we were in close quarters, 11:49	22 Q. I'm going to show you, Ms. Marz, if you 11:50
	23 we would talk more often. 11:49	23 could, please, Exhibit -- what has been marked as 11:51
	24 So it's -- it's pretty much a fluctuation. 11:49	24 Exhibit 3. 11:51
	25 Q. But you never communicated with 11:49	25 Would you, please -- 11:51
	Page 66	Page 68
IR	1 Ms. Pennington in 2015 and 2016 weekly; is that your 11:49	1 MS. BROOK: Let me just get an objection 11:51
	2 testimony? 11:49	2 on the record that the exhibit that has been marked 11:51
	3 A. I don't remember. I don't remember. 11:49	3 as Marz 3 does not appear to have been signed by 11:51
	4 There could have been moments where we were -- you 11:49	4 Ms. Marz on Page 63. 11:51
	5 know, I came to visit, I stayed with her -- there 11:49	5 BY MS. VASQUEZ: 11:51
	6 was moments where maybe we communicated more 11:49	6 Q. Ms. Marz, actually that's -- that's a good 11:51
	7 frequently. But there were also moments where there 11:49	7 point. 11:51
	8 were big gaps in our communication, depending on 11:49	8 Let's -- have you ever seen the deposition 11:51
	9 context of what was going on our lives. 11:49	9 transcript that's in front of you? 11:51
	10 Q. In your previous testimony, I'll represent 11:49	10 A. Yes. 11:51
	11 to you, Ms. Marz, that you testified that -- in at 11:49	11 Q. When did you first see it? 11:51
	12 least in July of 2016, you would communicate with 11:49	12 A. I don't remember. 11:51
IR	13 Ms. Pennington weekly. 11:49	13 Q. Was it in 2016? 11:51
	14 Is your testimony different today than it 11:49	14 A. No. 11:51
	15 was in July of 2016? 11:49	15 Q. Did you ever receive a booklet with your 11:51
	16 MS. BROOK: And let me get an objection on 11:49	16 deposition testimony back in 2016 and accompanied 11:51
	17 the record here. Lacks foundation referring to a 11:49	17 with probably a letter of some kind asking you to 11:51
	18 document that is not part of the record in this 11:49	18 review it and make any changes and execute that 11:51
	19 case. 11:49	19 copy? 11:51
	20 THE WITNESS: I don't remember. Maybe at 11:50	20 A. No. Not that I remember. 11:51
	21 that time, perhaps we were communicating -- like I 11:50	21 Q. Okay. So you never executed a -- you 11:51
	22 said, there were moments where we were communicating 11:50	22 never executed a -- that deposition transcript; is 11:51
	23 weekly or daily -- 11:50	23 that correct? 11:51
	24 BY MS. VASQUEZ: 11:50	24 A. Not that I remember. 11:51
	25 Q. Uh-huh. 11:50	25 Q. Okay. Turning your attention to Page 12. 11:51
	Page 67	Page 69

18 (Pages 66 - 69)

1	A. [Witness complies].	11:51	1	assuming -- I don't remember specific times. Let me	11:54	
2	Q. If you could, please, read starting on	11:52	2	just put it -- yeah, I don't remember.	11:54	
3	Page -- on Line 5, line numbers are to the left.	11:52	3	Q. My question isn't as to how many times.	11:54	
4	A. Uh-huh. You want me to read it out loud?	11:52	4	A. Uh-huh.	11:54	
5	Q. No. Just read it to yourself.	11:52	5	Q. The question is: Do you remember	11:54	
6	A. Uh-huh.	11:52	6	Ms. Heard ever talking about her relationship with	11:54	
7	Q. Through Line 16?	11:52	7	Mr. Depp with you? It's different.	11:54	
8	A. Uh-huh. Okay.	11:52	8	A. Right. But if I say yes, then I want to	11:54	
9	[Witness reviews document].	11:52	9	know the specific moments in time and I don't	11:54	
10	Okay.	11:52	10	remember specific moments in time, so...	11:54	
11	Q. Actually, could you read for me out loud	11:52	11	Q. But that's not my question.	11:54	
12	Lines 13 through 16?	11:52	12	A. Right.	11:54	
13	A. [Reading]:	11:52	13	Q. My question is specific.	11:54	
14	"QUESTION: And do you text message	11:52	14	A. Uh-huh.	11:54	
15	with Raquel?	11:52	15	Q. Do you recall Ms. Heard ever talking to	11:54	
16	"ANSWER: Yes.	11:52	16	you about her relationship with Mr. Depp?	11:54	
17	"QUESTION: How often do you text	11:52	17	A. No. Not that I remember.	11:54	
18	message with her?	11:52	18	Q. Okay. Do you recall Ms. Heard ever	11:54	F/A, SP, Lack of Pers. Know.
19	"ANSWER: Weekly."	11:52	19	telling you that Mr. Depp would hit her?	11:54	
20	Q. Is it safe to assume, Ms. Marz, that your	11:52	20	A. After -- yeah, not before -- I think so.	11:55	
21	testimony in July of 2016 was accurate and truthful?	11:52	21	I think after it came out.	11:55	
22	A. Yes.	11:52	22	Q. When you say it "came out," are you	11:55	
23	Q. You understood -- you took the same oath	11:53	23	referring --	11:55	
24	that you took today, right, to tell the truth under	11:53	24	A. I think after the incident --	11:55	
25	the penalty of perjury?	11:53	25	Q. -- to May 21st?	11:55	
Page 70			Page 72			
1	A. Yes.	11:53	1	A. I think after the incident, I think I	11:55	
2	Q. Okay. So when you testified in July of	11:53	2	became more clear about what was happening.	11:55	
3	2016 that you would communicate with Raquel, and	11:53	3	Q. Okay. So when you say "the incident," are	11:55	
4	Raquel is Ms. Pennington, for the record, weekly,	11:53	4	you referring to the May 21st, 2016, incident?	11:55	
5	was that a truthful and honest answer?	11:53	5	A. Yes.	11:55	
6	A. Yeah. I think -- I was definitely	11:53	6	Q. Between Mr. Depp and Ms. Heard, correct?	11:55	
7	referring to in that moment in time that --	11:53	7	A. Yes. Yes.	11:55	
8	apparently, if I said that, then it meant that I was	11:53	8	Q. Okay. So your testimony is that Ms. Heard	11:55	
9	clear that at that point we were texting weekly.	11:53	9	never told you about the abuse she was supposedly	11:55	
10	Q. Okay.	11:53	10	experiencing at the hands of Mr. Depp until after	11:55	
11	A. But I don't know for how many weeks.	11:53	11	May 21st, 2016?	11:55	
12	Q. Right.	11:53	12	MS. BROOK: Objection. Misstates the	11:55	
13	A. I don't know -- you know... that meant,	11:53	13	record.	11:55	
14	like, we weren't texting every day, but maybe, like,	11:53	14	MS. GOLDSTEIN: Join.	11:55	
15	once a week or something of that nature.	11:53	15	THE WITNESS: Not that I remember.	11:55	F/A, SP, Lack Pers. Know.
16	Q. Uh-huh. Do you recall Ms. Heard ever	11:53	16	BY MS. VASQUEZ:	11:55	
17	discussing her relationship with Mr. Depp with you?	11:53	17	Q. Okay. And you would agree with me that	11:55	
18	A. I don't recall specific moments. No.	11:54	18	you'd remember something as significant as one of	11:55	
19	Q. Do you ever recall her ever discussing her	11:54	19	your girlfriends telling you, somebody you have	11:55	
20	relationship with Mr. Depp with you?	11:54	20	known since Texas, when you were young girls, you	11:55	
21	MS. BROOK: Objection. Vague.	11:54	21	would remember if Ms. Heard told you that her	11:55	
22	THE WITNESS: Probably. Yes.	11:54	22	husband or fiancée or boyfriend was beating her; you	11:56	
23	BY MS. VASQUEZ:	11:54	23	would remember that, correct?	11:56	
24	Q. You do recall?	11:54	24	MS. GOLDSTEIN: Objection -- objection.	11:56	
25	A. I mean, I remember -- I mean -- I'm	11:54	25	Asked and answered.	11:56	
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19 (Pages 70 - 73)

1 MS. BROOK: Same objection. I also would 11:56
2 request that we not refer to them as "young girls." 11:56
3 MS. VASQUEZ: Davida, you can ask your 11:56
4 questions the way you want. 11:56
5 BY MS. VASQUEZ: 11:56
6 Q. Go ahead. 11:56
7 A. So the question is what? 11:56
8 MS. VASQUEZ: Go ahead. Do you mind 11:56
9 reading it back? 11:56
10 (The following record was read: 11:56
11 "QUESTION: Okay. And you would 11:55
12 agree with me that you'd remember 11:55
13 something as significant as one of your 11:55
14 girlfriends telling you, somebody you 11:55
15 have known since Texas, when you were 11:55
16 young girls, you would remember if 11:55
17 Ms. Heard told you that her husband or 11:55
18 fiancée or boyfriend was beating her; 11:56
19 you would remember that, correct?") 11:56
20 THE WITNESS: Yes. 11:56
21 BY MS. VASQUEZ: 11:56
22 Q. Okay. Are you familiar with the Eastern 11:56
23 Columbia building located 849 South Broadway Street 11:57
24 in Los Angeles, California? 11:57
25 A. Yes. 11:57

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1 Q. How are you familiar with that building? 11:57
2 A. That's where Raquel lived and Amber lived. 11:57
3 Q. And Mr. Depp lived? 11:57
4 A. I think he lived there part-time, yeah. 11:57
5 Q. Did Ms. Heard also live there part-time? 11:57
6 A. I don't know. I know that -- yeah, I 11:57
7 think so. I think. 11:57
8 Q. Didn't you live there part-time as well? 11:57
9 A. No. I didn't live there part-time. 11:57
10 Q. Did you ever live there? 11:57
11 A. I stayed there. But I didn't live there. 11:57
12 Q. So you always had another residence while 11:57
13 you stayed at the Eastern Columbia building? 11:57
14 A. No. 11:57
15 Q. Okay. So wouldn't you agree with me that 11:57
16 if you were staying there and didn't have another 11:57
17 residence, you were living at the Eastern Columbia 11:57
18 building? 11:57
19 A. For a very short time. 11:57
20 Q. Okay. 11:57
21 A. Yes. 11:57
22 Q. How short of a time? 11:57
23 A. A little over, maybe, two weeks. 11:57
24 Q. What year did you live at the Eastern 11:57
25 Columbia building? 11:58

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1 A. 2016. 11:58
2 Q. Do you recall what months you lived at the 11:58
3 Eastern Columbia building in 2016? 11:58
4 A. February. 11:58
5 Q. Or what month? 11:58
6 A. Yeah, it was in February. 11:58
7 Q. And your testimony is that you only lived 11:58
8 at the Eastern Columbia building in February of 2016 11:58
9 for two weeks? 11:58
10 A. It was around two weeks. I don't remember 11:58
11 the specific amount of time, but it was definitely a 11:58
12 little over two weeks, less than a month. And -- 11:58
13 yes. 11:58
14 Q. Did you stay at the Eastern Columbia 11:58
15 building, to use your words, after February of 2016? 11:58
16 A. Stay overnight? 11:58
17 Q. Uh-huh? 11:58
18 A. Yes. 11:58
19 Q. For how many nights would you stay 11:58
20 overnight at the Eastern Columbia building after 11:58
21 February of 2016? 11:58
22 A. I don't remember. 11:58
23 Q. A week at a time? 11:58
24 A. I don't think so. 11:58
25 Q. But after February of 2016, you had a 11:59

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1 residence? 11:59
2 A. Uh-huh. Yes. 11:59
3 Q. That you went to? 11:59
4 A. Yes. 11:59
5 Q. That you rented or owned; is that correct? 11:59
6 A. Yes. Yes. 11:59
7 Q. That was not the Eastern Columbia 11:59
8 building, right? 11:59
9 A. Yes. 11:59
10 Q. Okay. And when you stayed at the Eastern 11:59
11 Columbia building, did you stay in one of the 11:59
12 penthouses? 11:59
13 A. Yes. 11:59
14 Q. Okay. And did you understand that that 11:59
15 penthouse was owned by Mr. Depp at the time? 11:59
16 A. I assumed it was. Yes. 11:59
17 Q. Did you stay in the penthouse where Josh 11:59
18 Drew and Raquel Pennington lived? 11:59
19 A. Yes. 11:59
20 Q. Okay. Did you ever stay in the penthouse 11:59
21 where Amber Heard and Mr. Depp lived? 11:59
22 A. No. 11:59
23 Q. Were you aware at the time that Josh Drew 11:59
24 and Raquel Pennington were not paying rent to 11:59
25 Mr. Depp to live there? 11:59

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Vague/
Ambig.

20 (Pages 74 - 77)

1 MS. BROOK: Objection. Lacks foundation. 11:59
2 THE WITNESS: I was not aware of -- I 11:59
3 don't think I ever had those conversations. 11:59
4 BY MS. VASQUEZ: 12:00
5 Q. You never asked your friend Raquel 12:00
6 Pennington how she could afford to live at a nice 12:00
7 building? 12:00
8 A. I think I assumed that she was not paying 12:00
9 rent. I don't know if we ever actually talked about 12:00
10 it. I don't think we -- I don't remember. 12:00
11 Q. Okay. When you stayed at the Eastern 12:00
12 Columbia building in 2016 for two, three weeks, did 12:00
13 you pay Mr. -- rent -- did you pay Mr. Depp any 12:00
14 rent? 12:00
15 A. No. 12:00
16 Q. Okay. Did you ask Mr. Depp whether you 12:00
17 could pay him rent? 12:00
18 A. No. 12:00
19 Q. Is there a reason you didn't do that? 12:00
20 A. I never saw -- I mean, I -- no. There's 12:00
21 no specific reason why I didn't do it. 12:00
22 Q. Did you ask Ms. Heard whether you needed 12:00
23 to pay rent to stay at the Eastern Columbia 12:00
24 building? 12:00
25 A. I did not ask her. 12:00

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1 Q. Do you remember the first time you went to 12:00
2 the Eastern Columbia building? Approximately what 12:01
3 year that was? 12:01
4 A. I don't remember. 12:01
5 Q. How often do you think you visited the 12:01
6 Eastern Columbia building? How many times? 12:01
7 A. I don't -- 12:01
8 MS. GOLDSTEIN: Object. Objection. Vague 12:01
9 as to the time. 12:01
10 Do you mean how many times ever? 12:01
11 BY MS. VASQUEZ: 12:01
12 Q. Yeah. How many times ever? 12:01
13 A. I don't remember. 12:01
14 Q. More than ten? 12:01
15 A. Yeah. Probably. 12:01
16 Q. More than 20? 12:01
17 A. Probably around 20, I would say, more or 12:01
18 less. 12:01

19 Q. Okay. And when you went to the Eastern 12:01
20 Columbia building, is it fair to assume that you 12:01
21 were visiting Raquel Pennington and Josh Drew? 12:01
22 A. Yes. 12:01
23 Q. Did you ever go to the Eastern Columbia 12:01
24 building to visit Amber Heard or Johnny Depp? 12:01
25 A. Not that I remember. 12:01

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1 Q. I'm going to try to bring us to May 21st, 12:01
2 2016? 12:01
3 Do you -- 12:02
4 MS. BROOK: Before you start 12:02
5 Ms. Vasquez -- sorry, I don't want to interrupt. 12:02
6 But I just want to check in. 12:02
7 I think lunch is here, so if this is going 12:02
8 to be a long segment of questioning, I can check. 12:02
9 But I'm not positive lunch is here or not. 12:02
10 MS. VASQUEZ: Okay. Do you mind checking? 12:02
11 MS. BROOK: All right. Sure. 12:02
12 MS. VASQUEZ: Okay. We'll go off the 12:02
13 record quickly, but we'll stay here if that's okay 12:02
14 with everyone, unless we need to use the restroom. 12:02
15 THE VIDEOGRAPHER: This marks the end of 12:02
16 Media 1. Going off the record at 12:03 p.m. 12:02
17 12:02
18 (At the hour of 12:03 p.m. a luncheon 12:02
19 recess was taken. The deposition was
20 resumed at 1:04 p.m., with the same
21 persons being present.)
22
23
24
25

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1 Los Angeles, California,
2 Tuesday, November 26, 2019
3 1:04 p.m.
4 13:04
5 THE VIDEOGRAPHER: This marks the 13:04
6 beginning of Media Number 2. Going back on the 13:04
7 record at 1:05 p.m. 13:04
8 13:04
9 EXAMINATION (CONTINUED) 13:04
10 BY MS. VASQUEZ: 13:04
11 Q. Hello, Ms. Marz. We just took a lunch 13:04
12 break. 13:04
13 Did you meet with anybody during the lunch 13:04
14 break besides your attorney? 13:04
15 A. No. 13:04
16 Q. Okay. Did you speak to anybody on the 13:05
17 phone -- well, you don't have your phone? 13:05
18 A. No. 13:05
19 Q. I am going to take that back. 13:05
20 Okay. Let's go to May 21st, 2016. Do you 13:05
21 remember approximately what time you arrived at the 13:05
22 Eastern Columbia building? 13:05
23 A. I don't. 13:05
24 Q. Do you recall if it was the morning? 13:05
25 Afternoon? Evening? 13:05

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F/A, SP, Lack of
Pers. Know.

21 (Pages 78 - 81)

1 A. Around the afternoon. 13:05
2 Q. And for what purpose did you go to the 13:05
3 Eastern Columbia building on May 21st, 2016? 13:05
4 A. To assist Raquel in getting ready for a 13:05
5 bead show that she was going to be doing the 13:05
6 following day. 13:05
7 Q. And when you say a "Bead show," is it -- 13:05
8 am I correct to assume that she made jewelry using 13:05
9 beads? 13:05
10 A. Yes. 13:05
11 Q. Okay. So she was going to be selling some 13:05
12 of the jewelry she was making? 13:05
13 A. Yes. 13:05
14 Q. Okay. So who invited you over to the 13:05
15 Eastern Columbia building on May 21st, 2016? 13:05
16 A. Raquel. 13:05
17 Q. Okay. Did Raquel tell you that Amber was 13:05
18 going to be also at the Eastern Columbia building on 13:06
19 May 21st, 2016? 13:06
20 A. I don't remember if she told me. 13:06
21 Q. Were you surprised when you saw Amber at 13:06
22 the Eastern Columbia building on May 21st, 2016? 13:06
23 MS. BROOK: Objection. Assumes facts not 13:06
24 in evidence. 13:06
25 THE WITNESS: No. 13:06

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1 BY MS. VASQUEZ: 13:06
2 Q. Okay. And the reason you weren't 13:06
3 surprised is because you knew Ms. Heard lived at the 13:06
4 Eastern Columbia building; is that correct? 13:06
5 A. Correct. 13:06
6 Q. Okay. So when you first got to the 13:06
7 Eastern Columbia building, whose penthouse did you 13:06
8 go to first? 13:06
9 A. I don't remember. 13:06
10 Q. Is it safe to assume that you would not go 13:06
11 to anybody else's penthouse besides Rocky and 13:06
12 Josh's? 13:06
13 MS. GOLDSTEIN: Objection. Calls for 13:06
14 speculation. 13:06
15 BY MS. VASQUEZ: 13:06
16 Q. Without an invitation? 13:06
17 A. Ask the question again. 13:06
18 MS. VASQUEZ: Do you mind reading it back? 13:06
19 (The following record was read: 13:06
20 "QUESTION: Is it safe to assume 13:06
21 that you would not go to anybody else's 13:06
22 penthouse besides Rocky and Josh's? 13:06
23 Without an invitation?") 13:06
24 THE WITNESS: Yes. 13:07
25 ///

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1 BY MS. VASQUEZ: 13:07
2 Q. Okay. So is it your testimony that you 13:07
3 don't remember whether you went to Ms. Pennington 13:07
4 and Mr. Drew's penthouse first, when you first got 13:07
5 to the Eastern Columbia building on May 21st, 2016? 13:07
6 A. Yes. 13:07
7 Q. You don't remember one way or the other? 13:07
8 A. I don't remember one way or the other. 13:07
9 Q. Where else would you have gone at the 13:07
10 Eastern Columbia building on May 21st, 2016, if not 13:07
11 Rocky and Josh's penthouse? 13:07
12 A. I mean, I could have walked into one of 13:07
13 the other penthouses. 13:07
14 Q. Including Mr. Depp and Ms. Heard's? 13:07
15 A. Uh-huh. Yes. 13:07
16 Q. Okay. But you don't remember one way or 13:07
17 the other; is that correct? 13:07
18 A. I don't remember the first place I walked 13:07
19 in. 13:07
20 Q. Okay. What is your first memory of 13:07
21 May 21st, 2016? Where were you? 13:07
22 A. At the Eastern Columbia building -- that 13:07
23 day? 13:07
24 Q. Yes. 13:07
25 A. In general? 13:07

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1 Q. Well, no. At the Eastern Columbia 13:07
2 building when you got there, what is your first 13:07
3 memory of where you were? 13:08
4 A. My first memory of where I was -- my first 13:08
5 memory of where I was, I guess was in the penthouse 13:08
6 that was across the hall from Rocky and Josh's, a 13:08
7 little bit to the left. I don't remember what 13:08
8 specific unit it was. 13:08
9 Q. Okay. 13:08
10 A. That was my first memory. 13:08
11 Q. Okay. And what is in that penthouse? Is 13:08
12 there a bedroom in that penthouse? 13:08
13 A. From my memory, it was -- there was an 13:08
14 office, there was a closet, and I don't remember if 13:08
15 there was a bedroom in that specific unit. There 13:08
16 were -- you know, I think -- I don't remember. But 13:08
17 mainly, an office and a closet and a -- like a 13:08
18 downstairs hang out area. 13:08
19 Q. Okay. And whose items, if any, where in 13:08
20 that penthouse? 13:08
21 A. Most -- from my -- from my knowledge, 13:08
22 mostly Amber's items. 13:08
23 Q. Okay. Have you ever heard of that 13:09
24 penthouse described as "Penthouse 5" or "Amber's 13:09
25 closet"? 13:09

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F/A, SP,
Lack of
Pers.
Know.

H, F/A, SP, Lack of Pers. Know.	1 A. I feel like more so it was like -- I heard 13:09		1 Q. Okay. Was she there when you first got to 13:11	
	2 it referred to as Amber's studio. 13:09		2 Penthouse 5? 13:11	
	3 Q. Okay. And is that where Rocky was making 13:09		3 A. I don't remember. 13:11	
	4 the jewelry on May 21st, 2016? 13:09		4 Q. Was Josh there when you first got to 13:11	
	5 A. Yes. That's where we were set up. We 13:09		5 Penthouse 5? 13:11	
	6 were set up in that room. 13:09		6 A. I don't remember when I first got there. 13:11	
H, F/A, SP, Lack of Pers. Know.	7 Q. Okay. So your first memory is being -- 13:09		7 I don't remember. 13:11	
	8 I'm going to represent to you that that was 13:09		8 Q. Okay. Is it your testimony that Amber was 13:11	
	9 Penthouse 5. Okay? 13:09		9 with you in Penthouse 5 and Rocky and Josh for the 13:11	
	10 A. Uh-huh. 13:09		10 majority of the afternoon on May 21st, 2016? 13:11	
	11 Q. And that's important for you to remember. 13:09		11 MS. BROOK: Objection. Vague. 13:11	
	12 But -- so I'll represent to you that was Penthouse 13:09		12 THE WITNESS: Yeah. I would -- yes. For 13:11	
	13 5. 13:09		13 the majority -- for the most part. 13:11	
	14 So your first memory is being in Penthouse 13:09		14 BY MS. VASQUEZ: 13:11	
	15 5. So you don't remember if you visited either Josh 13:09		15 Q. Do you recall any point whether or not 13:11	F/A, SP, Lack of Pers. Know.
	16 and Rocky's penthouse before or Johnny and Amber's 13:09		16 there was a dog or multiple dogs in Penthouse 5, at 13:11	
	17 penthouse before being in Penthouse 5; is that your 13:09		17 any point on May 21st, 2016? 13:12	
	18 testimony? 13:09		18 A. Probably. There -- they both had dogs. 13:12	
	19 A. I don't remember, yes. 13:09		19 But I don't remember if the dogs were -- I think so. 13:12	
	20 Q. Okay. When you first remember being in 13:09		20 I think probably -- I'm pretty sure that there was 13:12	
	21 Penthouse 5, who was there with you? 13:09		21 dogs in the apartment at some points [verbatim]. 13:12	
	22 A. I don't remember who was there when I 13:09		22 Q. Who -- when you say "They both had dogs," 13:12	F/A, SP, Lack of Pers. Know.
	23 first arrived. But I can tell you who was there -- 13:10		23 who are you referring to? 13:12	
	24 in there throughout the evening or in the -- when I 13:10		24 A. Raquel and Amber both have dogs. 13:12	
	25 first got there it was Raquel -- I mean, maybe 13:10	Page 86	25 Q. Okay. And it was your understanding that 13:12	
F/A, SP, Lack of Pers. Know.	1 people are walking in and out, but for the most 13:10		1 neither of the dogs that were there belonged to 13:12	
	2 part, Raquel, Josh, and Amber. 13:10		2 Mr. Depp; is that correct? 13:12	
	3 Q. Okay. Anybody else that you saw that day 13:10		3 A. I don't -- neither of the dogs belonged to 13:12	
	4 on May 21st, 2016, at the Eastern Columbia building 13:10		4 Mr. Depp. I don't remember if Amber's dogs were in 13:12	
	5 in any of the penthouses? 13:10		5 there. I think, probably, Raquel's dog was in there 13:12	
	6 A. Yes. 13:10		6 and maybe Amber's and -- I mean, I am assuming they 13:12	
	7 Q. Who else did you see that day? 13:10		7 shared the dog. I don't know specifically. But I 13:12	
	8 A. I saw Johnny Depp, and I saw some police 13:10		8 am -- I don't remember specifically but there was -- 13:12	
	9 officers, and I saw some men with Johnny. 13:10		9 Amber does have a dog, so it could have very well 13:12	
	10 Q. Safe to assume that the men with Johnny 13:10		10 been in there. But I don't remember. 13:13	
	11 were his bodyguards? 13:10		11 Q. Do you recall at any time in the afternoon 13:13	F/A, SP, Lack of Pers. Know.
	12 A. Safe to assume so. 13:10		12 of May 21st, 2016, Raquel not being in Penthouse 5 13:13	
	13 Q. Okay. So you got to the penthouse some 13:10		13 with you while making jewelry and setting up for the 13:13	
	14 time after the afternoon of May 21st, 2016, correct? 13:10		14 show the next day? 13:13	
	15 A. Yes. 13:10		15 A. Yes. 13:13	
	16 Q. Okay. What did you do when you first go 13:10		16 Q. Okay. When do you recall her not being in 13:13	
	17 to Penthouse 5? 13:11		17 the penthouse on May 21st, 2016, Penthouse 5? 13:13	
	18 A. I was hanging out with my friends. We 13:11		18 A. When she left the apartment to -- at one 13:13	
	19 were figuring out what needed to be done to get the 13:11		19 point she left. 13:13	
	20 show ready to -- to go for the next day. 13:11		20 Q. Besides the one time she left Penthouse 5? 13:13	
	21 Q. Were you making jewelry? 13:11		21 A. Uh-huh. 13:13	
	22 A. I was helping -- yeah, I was helping with 13:11		22 Q. Do you recall any other time where Raquel 13:13	
	23 making the jewelry. 13:11		23 was not in Penthouse 5 with you? 13:13	
	24 Q. Okay. Was Amber there with you? 13:11		24 A. Not that I can remember. 13:13	
	25 A. Yes. 13:11	Page 87	25 Q. Okay. When you saw Ms. Heard for the 13:13	
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23 (Pages 86 - 89)

H, F/A, SP, Lack of
Pers. Know.

1 first time on May 21st, 2016, do you recall if she 13:13
2 was wearing any makeup? 13:14
3 A. I don't remember. 13:14
4 Q. Did she tell you what she was doing later 13:14
5 that day, Ms. Heard? 13:14
6 A. No. 13:14

H, F/A, SP, Lack of
Pers. Know

7 Q. Did she tell you -- Ms. Heard, did she 13:14
8 tell you she was seeing Mr. Depp later that day? 13:14
9 A. A little bit later on in the hangout, she 13:14
10 had mentioned that he was going to come by, but I 13:14
11 don't think -- I don't -- it wasn't my recollection 13:14
12 that she knew that that was happening when I first 13:14
13 arrived. 13:14
14 Q. Okay. And why do you say that, that it 13:14
15 wasn't your recollection that she knew he was coming 13:14
16 back by until later in the evening? 13:14
17 A. Because I think he -- from my -- from what 13:14
18 I took from it, he had not -- they hadn't seen each 13:14
19 other in a little while and so she found out that he 13:14
20 was coming by. And so it was voiced that he would 13:14
21 be stopping by to pick some things up, and they were 13:14
22 going to have a conversation. 13:14
23 Q. Did she tell you why they had not seen 13:14
24 each other in a little while? 13:14
25 A. I don't remember if she specifically told 13:14

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F/A, SP, Lack of
Pers. Know.

1 me why, but it felt like it was because they were, 13:15
2 you know, fighting. 13:15
3 Q. Okay. 13:15
4 A. And I don't know if anybody told me that 13:15
5 or that was just, like, what was insinuated from the 13:15
6 situation but -- yeah. 13:15
7 Q. And, again, using your word "fighting"? 13:15
8 A. Uh-huh. 13:15
9 Q. Did you -- was it conveyed to you in word 13:15
10 or substance that the fact that Johnny and Amber 13:15
11 were fighting -- 13:15
12 A. Uh-huh. 13:15
13 Q. -- that included physical violence? 13:15
14 A. No. 13:15
15 Q. "No," it was never conveyed to you? 13:15
16 A. In that -- 13:15
17 Q. That it included physical violence? 13:15
18 A. No, not in that moment. I don't remember 13:15
19 thinking or feeling like there was physical 13:15
20 violence. More just, you know -- 13:15
21 Q. And to confirm, up until May 21st, 2016, 13:15
22 and after, you never saw Mr. Depp ever lay a hand on 13:15
23 Ms. Heard; is that correct? 13:15
24 A. Up until that -- yeah, never saw him lay a 13:15
25 hand on Ms. Heard. 13:15

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1 Q. And after May 21st, 2016? 13:15
2 A. Right. 13:16
3 Q. And on May 21st, 2016, you never saw 13:16
4 Mr. Depp lay a hand on Ms. Heard? 13:16
5 A. Correct. 13:16
6 Q. Did you ever see him throw anything at 13:16
7 Ms. Heard? 13:16
8 A. No. 13:16
9 Q. Kick her? 13:16
10 A. No. 13:16

11 Q. Did you ever see Mr. Depp be violent 13:16 F/A, SP, Lack of
12 towards anyone? 13:16 Pers. Know., UN

13 MS. GOLDSTEIN: Objection. Vague. 13:16
14 THE WITNESS: I experienced him that night 13:16 F/A, SP, Lack
15 as -- like, I was -- personally, I was scared of 13:16 of Pers. Know.,
16 him. 13:16 UN

17 BY MS. VASQUEZ: 13:16

18 Q. Uh-huh. 13:16

19 A. So I -- that's all I can say from the 13:16 F/A, SP, Lack
20 moment that -- the one interaction I had with him 13:16 of Pers.
21 that night, it was frightening to me. His behavior 13:16 Know., UN
22 was frightening to me. 13:16

23 Q. Okay. We'll talk about that. 13:16

24 When you would go to the Eastern Columbia 13:16

25 building to hang out with Rocky or see Ms. Heard, 13:16
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1 based on your observations, would Ms. Heard 13:16
2 regularly wear makeup when she was at the apartment? 13:17

3 MS. BROOK: Objection. To form. 13:17

4 MS. GOLDSTEIN: Objection. Lacks 13:17

5 foundation. 13:17

6 THE WITNESS: No, I don't -- no. 13:17

7 BY MS. VASQUEZ: 13:17

8 Q. "No" she wouldn't wear makeup? 13:17

9 A. I mean, I didn't -- I don't think of her 13:17

10 as someone who wears a lot of makeup. No. 13:17

11 Q. Yeah. You have known her a long time -- 13:17

12 A. Right. 13:17

13 Q. -- she has never been somebody that wears 13:17

14 a lot of makeup, correct? 13:17

15 A. Exactly. Unless she is going to something 13:17

16 that she needs to put makeup on for. 13:17

17 Q. Right. But other than that, she is 13:17

18 usually bare faced and beautiful? 13:17

19 A. Yeah. 13:17

20 Q. Yeah. 13:17

21 Okay. Do you recall her wearing makeup -- 13:17

22 I think you already testified that so I'll strike 13:17

23 that. 13:17

24 You don't recall Ms. Heard, whether she 13:17 F/A, SP, Lack
25 was wearing makeup or not on May 21st, 2016. 13:17 of Pers. Know.

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F/A, SP, Lack of Pers. Know.	1 correct? 13:17		
	2 A. I don't know. I know at -- I know at one 13:17		
	3 point she went upstairs to, like, get ready to see 13:17		
	4 Mr. Depp. And I remember being, like, "Oh, wow. 13:17		
	5 You look really beautiful. You like perked yourself 13:17		
	6 up." So she very well could have been wearing very 13:18		
	7 natural makeup. 13:18		
	8 Q. Okay. So you recall Ms. Heard leaving 13:18		
	9 Penthouse 5 or going upstairs to Penthouse 5 and 13:18		
	10 getting ready to see Mr. Depp? 13:18		
	11 A. Yeah. I don't know specific -- I was in 13:18		
	12 the penthouse that we discussed, I guess Penthouse 13:18		
	13 5, where we were doing the beads, and I remember at 13:18		
	14 one point her leaving and changing and coming back. 13:18		
	15 Q. And you commented on her appearance? 13:18		
	16 A. Yeah. 13:18		
	17 Q. And what did you say to her exactly? 13:18		
	18 A. I don't remember specifically. But I 13:18		
	19 mentioned that I liked her outfit and that -- I 13:18		
	20 don't -- yeah, something of that nature. I don't 13:18		
	21 specifically remember. 13:18		
F/A, SP, Lack of Pers. Know.	22 Q. Did it appear to you that she had put on 13:18		
	23 makeup? 13:18		
	24 A. She had spruced herself up enough for me 13:18		
	25 to notice a difference in her appearance and that 13:18		
	Page 94		
Impr. Opinion, F/A, SP, Lack of Pers. Know.	1 she had gotten ready for this meeting. Not over the 13:18		
	2 top but in a casual sense. 13:18		
	3 Q. Do you recall whether Ms. Heard told you 13:19		
	4 that her and Mr. Depp had been fighting and arguing? 13:19		
	5 A. I don't recall specifically. But I know 13:19		
	6 there was talk of -- that they hadn't seen each 13:19		
	7 other and so there was definitely -- it didn't feel 13:19		
	8 like it was a happy marriage where they were 13:19		
	9 spending a lot of time together. So I do recall 13:19		
	10 hearing that he was spending a lot of time sleeping 13:19		
	11 elsewhere. 13:19		
Impr. Opinion, F/A, SP, Lack of Pers. Know.	12 And so that's what I remember. 13:19		
	13 MS. GOLDSTEIN: Ms. Vasquez, just to 13:19		
	14 clarify, were you asking about on that -- on that 13:19		
	15 afternoon or that -- 13:19		
	16 MS. VASQUEZ: Yeah. On May 21st, 2016. 13:19		
	17 MS. GOLDSTEIN: Thank you. 13:19		
	18 MS. VASQUEZ: Yeah. Thank you. 13:19		
	19 BY MS. VASQUEZ: 13:19		
	20 Q. Can you describe for me Ms. Heard's 13:19		
	21 general mood, demeanor that afternoon on May 21st, 13:19		
	22 2016, in relation to seeing Mr. Depp later? 13:19		
Impr. Opinion, F/A, SP, Lack of Pers. Know.	23 MS. BROOK: Object to form. 13:19		
	24 THE WITNESS: I don't really remember it 13:20		
	25 being -- 13:20		
	Page 95		
Impr. Opin. F/A, SP, Lack of Pers. Know.	1 BY MS. VASQUEZ: 13:20		
	2 Q. Do you recall if -- I'm sorry. 13:20		
	3 A. Yeah. I don't really remember it being, 13:20		
	4 like, drastically one way or another. 13:20		
	5 Q. Did she appear nervous to you? 13:20		
	6 MS. BROOK: Objection. Leading. 13:20		
	7 THE WITNESS: I don't know. I don't know. 13:20		
	8 BY MS. VASQUEZ: 13:20		
	9 Q. Why don't you know? You don't remember or 13:20		
	10 because? 13:20		
	11 A. I don't remember -- yeah, I don't remember 13:20		
Impr. Opin. F/A, SP, Lack of Pers. Know.	12 specifically, like, what her behavior was. I guess 13:20		
	13 I vaguely remember -- yeah, I vaguely remember 13:20		
	14 feeling like maybe she -- it did feel like maybe she 13:20		
	15 was a little nervous. I vaguely felt that. But I 13:20		
	16 don't have necessarily proof of that because I'm not 13:20		
	17 her, and I don't know what was actually going on in 13:20		
	18 her head. 13:20		
	19 Q. Why do you think she was perhaps nervous? 13:20		
	20 A. The -- from my perspective maybe because 13:20		
	21 she hadn't seen him for some time, maybe they had 13:21		
	22 been, you know, fighting in some way, shape, or 13:21		
Impr. Opin. F/A, SP, Lack of Pers. Know.	23 form. And so -- and I know -- I remember hearing, 13:21		
	24 like, he was coming back to pick up some clothing 13:21		
	25 before he was about to go on tour, so maybe that's 13:21		
	Page 96		
Impr. Opin. F/A, SP, Lack of Pers. Know.	1 the last time she was going to see him for a 13:21		
	2 little -- you know, it was just maybe a moment where 13:21		
	3 there was -- like they were going to be having a 13:21		
	4 conversation. So it felt like it was... 13:21		
	5 Q. But it's your testimony that you don't 13:21		
	6 remember her telling you anything specifically, 13:21		
	7 correct? 13:21		
	8 A. I don't remember her telling me anything 13:21		
	9 specifically, no. 13:21		
	10 Q. Do you recall Rocky Pennington telling you 13:21		
	11 anything specifically about Johnny and Amber meeting 13:21		
Impr. Opin. F/A, SP, Lack of Pers. Know.	12 up on May 21st, 2016? 13:21		
	13 MS. BROOK: Object to form. 13:21		
	14 THE WITNESS: I think similar to what I 13:21		
	15 had just expressed was that there was -- they had 13:21		
	16 been -- they hadn't seen each other. I mean, what 13:21		
	17 I -- from what I remember, it was similar to what I 13:21		
	18 expressed is they hadn't seen each other, he was 13:21		
	19 going off, they were going to see each other and 13:22		
	20 have a conversation. I don't know what about. I 13:22		
	21 don't know the details or anything. But I just know 13:22		
	22 that there had been some argument -- arguments and 13:22		
Impr. Opin. F/A, SP, Lack of Pers. Know.	23 they hadn't seen each other in awhile. 13:22		
	24 BY MS. VASQUEZ: 13:22		
	25 Q. But neither Ms. Pennington nor Ms. 13:22		
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25 (Pages 94 - 97)

Impr. Opinion, F/A,
SP, Lack of Pers.
Know.

1 Depp-- well, she was Ms. Depp at the time, but 13:22
2 Ms. Heard told you what they were arguing about or 13:22
3 what the conversation with Mr. Depp was going to be 13:22
4 about; is that correct? 13:22
5 A. There -- I -- so I'm sure there was 13:22
6 conversations about -- something that they were 13:22
7 arguing about. But I don't remember. So I -- I 13:22
8 can't -- I don't remember specifics. 13:22

9 Q. Okay. Do you know who Elon Musk is? 13:22
10 A. Yes. 13:22
11 Q. Who is Elon Musk? 13:22
12 A. He is a human being. He's a person. 13:22
13 Q. In relation to this case and the people in 13:22
14 this case, the parties involved in this case, do you 13:22
15 know who he is? 13:22
16 A. Yes, I do know who he is. Yeah. 13:22
17 Q. How do you know who Mr. Musk is? 13:23
18 A. Through Raquel and through Amber. 13:23
19 Q. Okay. And what do you know about Elon 13:23
20 Musk through Raquel? 13:23
21 A. That -- well, that he and Amber dated 13:23
22 after -- some time after. That they were friends, 13:23
23 knew each other socially, and then ended up, at some 13:23
24 point, dating. 13:23
25 Q. You said "after." When you say "after," 13:23
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1 after what are you referring to? 13:23
2 A. I mean, after this incident. Some time 13:23
3 after this incident. 13:23
4 Q. Do you know that for sure that they 13:23
5 dated -- let me -- let me -- strike that. 13:23
6 And start over. 13:23
7 Do you know for certain that Ms. Heard and 13:23
8 Mr. Musk dated after May 21st, 2016? 13:23
9 A. Do I know for sure? Yeah, I mean, as far 13:23
10 as I am aware, yes. 13:23
11 Q. And how do you know that for certain? 13:23
12 A. I don't. 13:23
13 Q. You just testified that you do know for 13:23
14 certain that they dated -- 13:24
15 A. Yeah. From my -- 13:24
16 Q. Let me finish my question. She can't take 13:24
17 down both of us talking at the same time. 13:24
18 You just testified that you know for 13:24
19 certain that they, meaning Ms. Heard and Mr. Musk, 13:24
20 dated after May 21st, 2016? 13:24
21 A. Uh-huh. 13:24
22 Q. And now you are saying you don't know for 13:24
23 sure. 13:24
24 So how do you know? Do you know that they 13:24
25 dated only after May 21st, 2016? 13:24
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1 A. Yes. 13:24
2 Q. Okay. How do you know that? 13:24
3 A. That's what I know. That's what I have 13:24
4 heard -- 13:24
5 Q. That's what you have been told? 13:24
6 A. That's what I have been told, yes. 13:24
7 Q. And you have been told that by 13:24
8 Ms. Pennington; is that correct? 13:24
9 A. Yes. 13:24
10 Q. And by Ms. Heard, correct? 13:24
11 MS. BROOK: Objection. Move to strike. 13:24
12 THE WITNESS: Yes. 13:24
13 MS. VASQUEZ: What are you moving to 13:24
14 strike, Davida? 13:24
15 MS. BROOK: Sorry. She was going a little 13:24
16 fast. The testimony you are soliciting about 13:24
17 Ms. Pennington told her, move to strike as hearsay. 13:24
18 BY MS. VASQUEZ: 13:24
19 Q. Did you ever meet Mr. Musk? 13:24
20 A. Yes. 13:25
21 Q. When did you meet him? 13:25
22 A. Multiple times. 13:25
23 Q. When was the first time you met him? 13:25
24 A. I don't remember. I don't remember the 13:25
25 dates. 13:25
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1 Q. Before or after May 21st, 2016? 13:25
2 A. After. 13:25
3 Q. You are certain about that? 13:25
4 A. Yes. 13:25
5 Q. Do you recall how long after May 21st, 13:25
6 2016, you met Mr. Musk? 13:25
7 A. I don't recall. 13:25
8 Q. Within that year of 2016? 13:25
9 A. I think so. 13:25
10 Q. When you met Mr. Musk, I assume you met 13:25
11 him with Ms. Heard; is that correct? 13:25
12 A. Yes. 13:25
13 Q. Did Raquel Pennington ever tell you that 13:25
14 Mr. Musk was violent towards Ms. Heard? 13:25
15 A. No. 13:25
16 Q. Did Ms. Heard ever tell you that Mr. Musk 13:25
17 was violent with Ms. Heard? 13:25
18 A. No. 13:25
19 Q. Considering you and Ms. Heard and 13:26
20 Ms. Pennington were all girlfriends; is that a fair 13:26
21 description of your relationship? 13:26
22 A. Yeah. 13:26
23 Q. Yeah. 13:26
24 Would you talk about lovers, sexual 13:26
25 experiences that you had? 13:26
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26 (Pages 98 - 101)

1	MS. GOLDSTEIN: Objection. Vague.	13:26	1	Q. Okay. Would it surprise you to know that	13:28
2	THE WITNESS: Yeah.	13:26	2	Mr. Franco and Ms. Heard had indeed a sexual	13:28
3	BY MS. VASQUEZ:	13:26	3	relationship?	13:28
4	Q. Did Ms. Heard ever tell you that she	13:26	4	MS. BROOK: Objection. Assumes facts not	13:28
5	enjoyed rough sex?	13:26	5	in evidence. Lack of foundation. Lack of personal	13:28
6	A. No.	13:26	6	knowledge.	13:28
7	Q. Did Ms. Pennington ever tell you that	13:26	7	THE WITNESS: Would it surprise me? Yeah.	13:28
8	Ms. Heard enjoyed rough sex?	13:26	8	BY MS. VASQUEZ:	13:28
9	A. No.	13:26	9	Q. Why would it surprise you?	13:28
10	Q. Did she tell you that she liked to be hit	13:26	10	A. Well, it wouldn't surprise -- I just -- I	13:28
11	during sex?	13:26	11	had no recollection of them dating, so it would be	13:28
12	A. No.	13:26	12	new news to me.	13:28
13	Q. Did Ms. Heard ever tell you she liked to	13:26	13	Q. Did Ms. Heard ever tell you before	13:28
14	be hit during sex?	13:26	14	May 21st, 2016, or on May 21st, 2016, that she was	13:28
15	A. No.	13:26	15	engaging in a sexual relationship with Mr. Musk?	13:28
16	MS. BROOK: I move to strike this whole	13:26	16	A. No.	13:28
17	line of questioning as assuming facts not in	13:26	17	Q. Same question as to Mr. Franco; did	13:28
18	evidence. Lack of foundation.	13:27	18	Ms. Heard ever tell you she was engaging in a sexual	13:28
19	BY MS. VASQUEZ:	13:27	19	relationship with Mr. Franco before or on May 21st,	13:28
20	Q. Did Ms. Heard ever tell you that she was	13:27	20	2016?	13:29
21	violent towards Mr. Musk?	13:27	21	A. No.	13:29
22	A. No.	13:27	22	Q. So after Ms. Heard left Penthouse 5 or	13:29
23	Q. Did Ms. Pennington ever tell you that	13:27	23	went upstairs in Penthouse 5 to spruce herself up,	13:29
24	Ms. Heard was violent towards Mr. Musk?	13:27	24	did she come back to Penthouse 5?	13:29
25	A. No.	13:27	25	A. Yes.	13:29
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1	MS. BROOK: Same objections.	13:27	1	Q. Okay. And at some point after she came	13:29
2	BY MS. VASQUEZ:	13:27	2	back, did she leave again?	13:29
3	Q. Did Ms. Pennington ever tell you that	13:27	3	A. Yes.	13:29
4	Ms. Heard was violent with Mr. Depp?	13:27	4	Q. Okay. Do you recall approximately what	13:29
5	A. No.	13:27	5	time that was?	13:29
6	Q. Did Ms. Heard ever tell you that she was	13:27	6	A. No. I don't remember.	13:29
7	violent with Mr. Depp?	13:27	7	Q. Can you give me an estimate as to how much	13:29
8	A. No.	13:27	8	time had elapsed between the time you got to the	13:29
9	MS. BROOK: Same objections.	13:27	9	Eastern Columbia building on May 21st, 2016, and	13:29
10	BY MS. VASQUEZ:	13:27	10	when Amber Heard left to meet up, presumably, with	13:29
11	Q. Do you know who James Franco is?	13:27	11	Mr. Depp?	13:29
12	A. Yeah.	13:27	12	A. I don't remember times or timeline of --	13:29
13	Q. How do you know who James Franco is?	13:27	13	amount of time.	13:29
14	A. Just through, you know, movies.	13:27	14	Q. More than an hour?	13:29
15	Q. Do you know whether James Franco and Amber	13:27	15	A. Maybe.	13:29
16	Heard ever dated?	13:27	16	Q. Less than five hours?	13:29
17	A. No.	13:27	17	A. Less than five hours.	13:29
18	Q. You don't know one way or the other?	13:27	18	Q. Okay. Less than three hours?	13:29
19	A. I don't think they did, but from my	13:27	19	A. Yeah. Less than three hours.	13:30
20	knowledge, no.	13:27	20	Q. At any point did Ms. Pennington leave with	13:30
21	Q. What was your impression of	13:27	21	Ms. Heard before Mr. Depp arrived to the Eastern	13:30
22	her relationship -- Ms. Heard's relationship with	13:28	22	Columbia building on May 21st, 2016?	13:30
23	Mr. Franco?	13:28	23	MS. BROOK: Objection. She's testified	13:30
24	A. I was aware that she filmed a movie	13:28	24	she doesn't know when Mr. Depp arrived to the	13:30
25	together and that's about it.	13:28	25	Eastern Columbia building on May 21st, 2016.	13:30
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27 (Pages 102 - 105)

1 MS. VASQUEZ: Actually, she hasn't 13:30
2 testified that she doesn't know when Mr. Depp 13:30
3 arrived. 13:30
4 THE WITNESS: Not that I remember. 13:30
5 BY MS. VASQUEZ: 13:30
6 Q. So it's your recollection, your best 13:30
7 recollection that Ms. Pennington was with you in 13:30
8 Penthouse 5 and never left with Ms. Heard before 13:30
9 Mr. Depp arrived; is that correct? 13:30
10 A. Correct. 13:30
11 Q. Same question as to Mr. Drew; do you 13:30
12 recall if Mr. Drew ever left with Ms. Heard before 13:30
13 Mr. Depp arrived at the Eastern Columbia building on 13:30
14 May 21st, 2016? 13:30
15 A. Not from my recollection. 13:30
16 Q. He was with you the entire time in 13:30
17 Penthouse 5? 13:30
18 A. You know, unless he went back to his place 13:31
19 to go grab something quickly. For the most part, I 13:31
20 think so. 13:31
21 Q. Okay. Do you recall Ms. Heard saying 13:31
22 anything to either you or Ms. Pennington when she 13:31
23 left to meet up with Mr. Depp on May 21st, 2016? 13:31
24 A. No. 13:31
25 Q. Do you recall her saying anything -- 13:31
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H, F/A, SP, Lack of
Pers. Know.

1 they had -- there had been talk of them fighting 13:32
2 so... 13:32
3 BY MS. VASQUEZ: 13:32
4 Q. But never any fighting that included 13:32
5 violence, correct? 13:32
6 A. Not from my -- at that point, that wasn't 13:32
7 what I was expecting. 13:32
8 Q. Right. 13:32
9 So what happened next, Ms. Heard leaves 13:33
10 and then what happens? 13:33
11 Ms. Pennington has her phone, I assume, 13:33
12 with her -- 13:33
13 A. Yeah. 13:33
14 Q. -- and she is there in Penthouse 5, what 13:33
15 happened next? 13:33
16 A. At some point, and I don't remember 13:33
17 what -- what -- you know, ignited it, but Raquel 13:33
18 went over there. And I think it was -- maybe that 13:33
19 there was a text -- I don't remember specifically, 13:33
20 but I -- from my memory, from what I can remember, I 13:33
21 think there was a text message that summoned her. 13:33
22 But I don't remember if that was the case or 13:33
23 if she -- I don't remember how it happened, but she 13:33
24 at one point got up to leave. 13:33
25 Q. And when Raquel got up to leave? 13:33
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H, F/A, SP,
Lack of
Pers. Know.

1 Ms. Heard saying anything to the effect of -- to 13:31
2 Rocky, "I may need you, so keep your phone on you"? 13:31
3 Do you recall anything like that? 13:31
4 A. I recall there was an interaction, and I 13:31
5 don't remember if it came from Amber's or Raquel's 13:31
6 mouth. But something like, it could have been -- it 13:31
7 could have been that Raquel said "I'll have my phone 13:31
8 if you need me." Or it could have been Amber saying 13:31
9 "Have your phone in case I need you." I don't 13:31
10 remember who, but there was some sort of interaction 13:31
11 between them where Raquel is like "If you need me, 13:31
12 I'm here." Something. 13:32
13 Q. Did you think that that was strange, that 13:32
14 either one of them was, you know, saying to one 13:32
15 another "I'll have my phone if you need me"? 13:32
16 A. Did I think it was strange? 13:32
17 No, not necessarily. I didn't -- I don't 13:32
18 remember thinking in the moment that it was strange. 13:32
19 Q. When you go meet with your boyfriend, do 13:32
20 you often tell your girlfriends "Please have your 13:32
21 phone with me" -- or "With you in case I need you"? 13:32
22 A. No. 13:32
23 MS. GOLDSTEIN: Objection. Relevance. 13:32
24 THE WITNESS: No. But the reason why I 13:32
25 didn't think it was that strange was because I knew 13:32
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H, F/A, SP, Lack of
Pers. Know.

1 A. Uh-huh 13:33
2 Q. Did she seem flustered, scared, nervous? 13:33
3 MS. BROOK: Objection. 13:33
4 BY MS. VASQUEZ: 13:33
5 Q. Or did she normally get up calmly and 13:33
6 leave? 13:33
7 MS. BROOK: Objection. Leading. 13:33
8 THE WITNESS: I mean, I don't -- I think 13:33
9 there was a mixture of some, you know, intensity in 13:33
10 her. 13:34
11 BY MS. VASQUEZ: 13:34
12 Q. What makes you say that there was a 13:34
13 mixture of intensity in Raquel? 13:34
14 A. I think that -- I think she felt like she 13:34
15 was like -- that there could have been -- I think 13:34
16 there was -- could have been something that was 13:34
17 going to be happening that she needed to be able to 13:34
18 be there for to -- to -- that could have caused some 13:34
19 nerves. Like, maybe there was a little bit of 13:34
20 nervousness, but I can't specifically remember. It 13:34
21 happened really fast where she kind of got up and 13:34
22 left, from what I remember. 13:34
23 Q. Do you recall if Raquel said anything to 13:34
24 you before she left? 13:34
25 A. I don't recall. 13:34
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F/A, SP, Lack of
Pers. Know.

F/A, SP, Lack of
Pers. Know.

F/A, SP, Lack of
Pers. Know.

F/A, SP, Lack of
Pers. Know.

1 Q. Do you recall Raquel saying anything to 13:34	1 Q. But you do remember it being early 13:36
2 Josh before she left? 13:34	2 evening, correct? 13:36
3 A. I don't recall. 13:34	3 A. Yeah. From what I remember. 13:36
4 Q. If Raquel would have said something to the 13:34	4 Q. Okay. So Ms. Pennington leaves Penthouse 13:36
5 effect of "She needs me," referring to Amber, would 13:34	5 5, presumably she goes to Penthouse 3 where 13:36
6 you remember that? 13:34	6 Ms. Heard is. Prior to her leaving, Ms. Pennington, 13:36
7 MS. BROOK: Objection. 13:34	7 do you recall hearing anything unusual? Yelling? 13:36
8 MS. GOLDSTEIN: Objection. Calls for 13:34	8 Screaming? 13:36
9 speculation. 13:34	9 A. I don't recall. 13:36
10 MS. BROOK: Yeah. And lacks foundation. 13:34	10 Q. You don't recall hearing it, or you didn't 13:36
11 THE WITNESS: I don't remember -- I don't 13:34	11 hear it? 13:37
12 know. 13:34	12 A. No, I don't remember hearing anything. 13:37
13 BY MS. VASQUEZ: 13:34	13 Q. Okay. I know you have testified earlier 13:37
14 Q. You don't know if you would remember that? 13:34	14 that you have been to the Eastern Columbia building, 13:37
15 A. I don't know if I would remember -- yeah. 13:34	15 visited it maybe 20 times, give or take, correct? 13:37
16 Q. Okay. Did you see the text that Raquel 13:34	16 A. Correct. 13:37
17 received from Amber Heard on May 21st, 2016, 13:35	17 Q. Do you recall whether they were noisy 13:37
18 summoning her to Penthouse 3? 13:35	18 penthouses, in other words, were the walls thin? 13:37
19 A. No. 13:35	19 Could you hear people walking in the hallway or 13:37
20 MS. BROOK: Objection. Assumes facts not 13:35	20 walking -- or speaking between the penthouses? 13:37
21 in evidence. 13:35	21 MS. BROOK: Objection. Leading. 13:37
22 BY MS. VASQUEZ: 13:35	22 THE WITNESS: Like if I was in one -- are 13:37
23 Q. Okay. So Ms. Pennington leaves Penthouse 13:35	23 you asking if I was in one penthouse, would I be 13:37
24 5, where you are making beads, and she, you assume, 13:35	24 able to hear someone speaking in another penthouse? 13:37
25 goes to the penthouse where Mr. Depp and Ms. Heard 13:35	25 ///
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1 resided; is that correct? 13:35	1 BY MS. VASQUEZ: 13:37
2 A. Uh-huh. Correct. 13:35	2 Q. Correct? 13:37
3 Q. Okay. Do you remember approximately what 13:35	3 A. No. 13:37
4 time in the day on May 21st, 2016, the text message 13:35	4 Q. They were -- 13:37
5 came from Ms. Heard? 13:35	5 A. I would not -- I wouldn't be able -- I 13:37
6 A. Again, I don't know if it was a text 13:35	6 don't think if it was normal speaking voice, I don't 13:37
7 message or... 13:35	7 think I would be able to hear. No. 13:37
8 Q. Right. 13:35	8 Q. How about yelling? Shouting? 13:37
9 A. Or if it was -- I don't know. 13:35	9 A. I don't know. 13:37
10 But no, I don't remember timing of 13:35	10 Q. Did you ever hear anybody yelling or 13:37
11 anything. 13:35	11 shouting in one of the penthouses, if you were in 13:38
12 Q. Was it dark outside? 13:35	12 one of the other penthouses at the Eastern Columbia 13:38
13 A. I don't remember. 13:35	13 building? 13:38
14 Q. Okay. Would reviewing your -- would 13:36	14 A. That night I heard that kind of noise. I 13:38
15 reviewing your previous deposition testimony refresh 13:36	15 don't know if it -- they were in the hallway or I 13:38
16 your recollection as to the time that Ms. Pennington 13:36	16 don't know exactly where they were though. 13:38
17 left Penthouse 5 and went to Penthouse 3 where 13:36	17 Q. Okay. So after Ms. Pennington leaves, 13:38
18 Ms. Heard was? 13:36	18 what happened next? 13:38
19 A. You know, it was in the early evening. I 13:36	19 A. Josh and I stayed back and continued to 13:38
20 don't remember if it was dark out. 13:36	20 make stuff. Josh visibly kind of nervous because at 13:38
21 Q. Okay. 13:36	21 some point in that time we started to hear noises. 13:38
22 A. I just remember early evening and -- but 13:36	22 Like, you know, more of a commotion. 13:38
23 the specific time, I have no idea. I don't think 13:36	23 And so Joshua was kind of -- I remember 13:38
24 reviewing the deposition would help me remember any 13:36	24 him pacing a little bit by the door of the penthouse 13:38
25 time. 13:36	25 we were in and kind of looking through the peephole 13:38
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H, F/A, SP,
Lack of
Pers. Know.

1 to see what was going on. 13:38
 2 Q. Okay. I'm going to back up a little bit. 13:39
 3 A. Uh-huh. 13:39
 4 Q. How much time between Ms. Pennington 13:39
 5 leaving Penthouse 5, where you and Josh were -- 13:39
 6 A. Uh-huh. 13:39
 7 Q. -- and from the time you started hearing 13:39
 8 some commotion? Again, best estimate? 13:39
 9 A. I would say less than an hour, but it's 13:39
 10 hard to say. 13:39
 11 Q. Okay. So Ms. Pennington left -- 13:39
 12 A. Uh-huh. 13:39
 13 Q. -- Penthouse 5, and within less than an 13:39
 14 hour, you start hearing a commotion; is that 13:39
 15 correct? 13:39
 16 A. Yes. 13:39
 17 Q. Okay. Less than hour but more than 13:39
 18 30 minutes? 13:39
 19 A. Could have been less than 30 minutes. 13:39
 20 Q. Well, which one was it? 13:39
 21 A. I don't know. I don't know. It was 13:39
 22 within -- it could have been around 30 minutes or -- 13:39
 23 I guess -- it wasn't -- it was probably less -- I 13:39
 24 mean it's really -- I don't know, it's hard to say. 13:39
 25 But it definitely wasn't more than 45 minutes. It 13:39
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1 could have been also 20 minutes. I don't remember 13:40
 2 the time -- the timing but it felt like it was fast 13:40
 3 so... 13:40

4 Q. But when Ms. Pennington first left 13:40
 5 Penthouse 5, did Josh appear nervous to you, or was 13:40
 6 he pacing? 13:40
 7 A. From my recollection, from what I 13:40
 8 remember, in the beginning, no. But then very soon 13:40
 9 after is when we heard the noises, and that's when I 13:40
 10 experienced him pacing and getting up and you -- 13:40
 11 Q. When you say "Very soon after," you mean 13:40
 12 less than an hour? 13:40
 13 A. Yeah. 13:40

14 Q. Okay. 13:40
 15 A. And it could have been less than 13:40
 16 30 minutes. I don't remember specific timing. 13:40
 17 Q. Okay. But you would agree that is 13:40
 18 different than very soon after? Very soon after 13:40
 19 implies within five minutes? Ten minutes? 13:40
 20 A. It could have been, though. So I don't -- 13:40
 21 timing, again, is rough for me. I don't remember 13:40
 22 specifically. I remember it happening soon. There 13:40
 23 wasn't a long period of time where Josh and I were 13:40
 24 in the apartment. It was shorter than it was 13:40
 25 longer. 13:40
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1 Q. Okay. So you hear some type of commotion, 13:41 F/A, SP, Lack
 2 you don't know where it is coming from, correct? 13:41 of Pers. Know.
 3 A. It sounds like -- yeah, it sounds like 13:41
 4 it's coming from -- I hear -- we hear commotion and 13:41
 5 then it feels like it's getting closer and closer 13:41
 6 and closer. 13:41

7 Q. What type of commotion? Could you 13:41
 8 describe for me the commotion? Was it a man's 13:41
 9 voice? Was it a woman's voice? Was it a 13:41
 10 combination of men and women? What was the 13:41
 11 commotion like that you heard? 13:41
 12 MS. BROOK: Objection. Leading. 13:41
 13 THE WITNESS: I don't remember if -- if 13:41
 14 you want to ask me the specifics of the noise, I -- 13:41
 15 I don't remember. 13:41
 16 BY MS. VASQUEZ: 13:41

17 Q. Did it sound like voices, or did it sound 13:41 F/A, SP, Lack
 18 like destruction? 13:41 of Pers. Know.
 19 A. It sounded like voices and destruction. 13:41
 20 Q. Okay. Going back, you said Josh's 13:41
 21 reaction was he was pacing? 13:42
 22 A. Uh-huh. 13:42
 23 Q. And looking through the peephole, correct? 13:42
 24 A. Uh-huh. 13:42

25 Q. At any point did Josh open the door to 13:42
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1 Penthouse 5? 13:42
 2 A. No. 13:42
 3 Q. And to confirm, his wife or fiancée at the 13:42
 4 time, correct? They were fiancée? 13:42
 5 A. They were fiancée. 13:42
 6 Q. Right. So his fiancée was not in 13:42
 7 Penthouse 5 with you, correct? 13:42
 8 A. Correct. 13:42
 9 Q. She was where the commotion was coming 13:42
 10 from? 13:42
 11 A. Correct. 13:42
 12 MS. BROOK: Objection. It assumes facts 13:42
 13 not in evidence. Lack of personal knowledge. 13:42
 14 THE WITNESS: From -- from my knowledge 13:42

15 she was -- yeah, she was there. 13:42
 16 BY MS. VASQUEZ: 13:42
 17 Q. Okay. Did you think it was strange that 13:42
 18 Josh didn't open the door to Penthouse 5 to see what 13:42
 19 the commotion was? 13:43
 20 MS. BROOK: Objection. Calls for 13:43
 21 speculation. 13:43
 22 THE WITNESS: I don't remember thinking it 13:43
 23 was strange in that moment. 13:43
 24 BY MS. VASQUEZ: 13:43
 25 Q. Did it seem like Joshua was concerned for 13:43
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F/A, SP, Lack of Pers. Know.	1 his fiancée's safety? 13:43	1 A. So it all happened very fast. He 13:44	F/A, SP, Lack of Pers. Know.
	2 A. Yes. 13:43	2 basically -- the door kind of burst open and he came 13:45	
	3 Q. And his reaction was to look through a 13:43	3 in very -- just, from my perspective, really under 13:45	
	4 peephole? 13:43	4 the influence of something, drugs or alcohol, 13:45	
	5 A. I mean -- it was all -- it all happened 13:43	5 because he was very sloppily like -- he looked 13:45	
	6 very fast. So like from the moment we heard the 13:43	6 wasted. 13:45	
	7 commotion and him standing -- it wasn't like a long 13:43	7 He was holding a very large bottle of 13:45	
	8 period of time when he was standing by the door. It 13:43	8 wine, looked like some sort of, like, magnum of 13:45	
	9 was all very fast. 13:43	9 bottle of wine, which was kind of spilling all over 13:45	
F/A, SP, Lack of Pers. Know.	10 Q. It was funny to you that he looked through 13:43	10 the place. And as he opened the door, he just -- 13:45	F/A, SP, Lack of Pers. Know.
	11 a peephole versus open the door? 13:43	11 what I remember, what he mumbled was, "Get your 13:45	
	12 A. Well, no. I think that -- I'm just -- I 13:43	12 bitch out of here." 13:45	
	13 don't think anything is funny. I am just assuming 13:43	13 And I just remember it all happened very 13:45	
	14 that -- I am remembering how quickly it was. It 13:43	14 fast. Like the door slamming, him saying "Get your 13:45	
	15 wasn't like he was cowering behind the door. It was 13:43	15 bitch out of here," the wine, that whole -- you 13:45	
	16 more just -- it was you all really fast from the 13:43	16 know, his way -- his whole being really frightened 13:45	
	17 moment -- from my experience, from the moment we 13:43	17 me and almost felt like he was coming towards me, 13:45	
	18 heard the commotion. From what I remember, it fast 13:43	18 from my perspective. Whether he was coming toward 13:45	
F/A, SP, Lack of Pers. Know., Vague/Ambig.	19 from the moment -- we heard the commotion to the 13:43	19 me or not, it scared me, and I just ran out past 13:45	F/A, SP, Lack of Pers. Know.
	20 moment the door slammed open. 13:44	20 him. 13:45	
	21 Q. But the door was abruptly opened, correct? 13:44	21 Q. Let's start unpacking that. 13:45	
	22 A. Abruptly opened. 13:44	22 Okay. So Mr. Depp comes through the door. 13:45	
	23 Q. Yeah. Okay. So you hear the commotion, 13:44	23 Where were you standing? 13:46	
	24 it feels like it's getting closer -- 13:44	24 A. In the -- you know, that was like a -- 13:46	
	25 A. Uh-huh. 13:44	25 there was a couch in there, there was a table. I 13:46	
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F/A, SP, Lack of Pers. Know., Vague/Ambig.	1 Q. -- and closer? 13:44	1 don't specifically remember where exactly I was 13:46	F/A, SP, Lack of Pers. Know.
	2 A. Uh-huh. 13:44	2 standing but I was -- I could have been sitting. 13:46	
	3 Q. What happened next? 13:44	3 Q. Where was Josh -- I'm sorry. 13:46	
	4 A. Then, you know, soon after the door 13:44	4 Go ahead. 13:46	
	5 slammed open and Johnny came, like, bursting through 13:44	5 A. Joshua closer to the door. 13:46	
	6 the door. 13:44	6 Q. Okay. When Mr. Depp came through the 13:46	
	7 Q. Who opened the door? 13:44	7 door, was Josh appearing through the peephole still? 13:46	
	8 A. Johnny. 13:44	8 A. He was standing by the door, from what I 13:46	
	9 Q. Was Johnny alone? 13:44	9 remember. 13:46	
F/A, SP, Lack of Pers. Know., Vague/Ambig.	10 A. It was the two men behind him. 13:44	10 Q. Okay. The door hit him? 13:46	F/A, SP, Lack of Pers. Know.
	11 Q. Okay. 13:44	11 A. I don't remember if the door hit him. 13:46	
	12 A. Following him. 13:44	12 Q. And I believe you testified that Mr. Depp 13:46	
	13 Q. Did you -- sorry. 13:44	13 said something to the effect of "Get your bitch out 13:46	
	14 Did you see Ms. Heard? 13:44	14 of here"? 13:46	
	15 A. In that moment? 13:44	15 A. Uh-huh. 13:46	
	16 Q. Yes. 13:44	16 Q. Who was Mr. Depp referring to when he made 13:46	
	17 A. No. 13:44	17 that comment? 13:46	
	18 Q. Did you see Ms. Pennington? 13:44	18 MS. BROOK: Objection. Calls for 13:46	
F/A, SP, Lack of Pers. Know., Vague/Ambig.	19 A. Not in that moment. 13:44	19 speculation. 13:46	F/A, SP, Lack of Pers. Know.
	20 Q. Could you hear Ms. Pennington or 13:44	20 THE WITNESS: I do not know. 13:46	
	21 Ms. Heard? 13:44	21 BY MS. VASQUEZ: 13:46	
	22 A. No. 13:44	22 Q. Who did he direct that comment to? Was it 13:46	
	23 Q. Okay. So Johnny opens the door, he's got 13:44	23 Josh? 13:46	
	24 his two, what we'll assume, are his bodyguards with 13:44	24 MS. BROOK: Objection. Leading. 13:46	
	25 him, what happens next? 13:44	25 THE WITNESS: I don't remember. 13:46	
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F/A, SP, Lack of Personal Know., Impr. Opinion	1 BY MS. VASQUEZ: 13:46	1 A. He was -- it was much more sloppy and all 13:49	F/A, SP, Lack of Pers. Know.
	2 Q. Did you think in that moment that Mr. Depp 13:46	2 over the place and frightening and -- yeah, 13:49	
	3 was referring to you? 13:46	3 combative, you know, felt very angry. He felt angry 13:49	
	4 A. I had no idea who he was referring to. 13:46	4 and -- yeah, 13:49	
	5 Q. You said Mr. Depp appeared to be either 13:47	5 Q. And when you say "combative," what was 13:49	
	6 drunk or high; is that correct? 13:47	6 combative specifically about his demeanor? 13:49	
	7 A. He was -- seemed to be intoxicated. 13:47	7 A. Just the way he burst through the room, 13:49	
	8 Q. Okay. Is that different than drunk? 13:47	8 just very forcefully and rushed in very quickly. To 13:49	
	9 A. No. I mean, yeah, I guess -- yeah, he 13:47	9 the point it made me want to get past him and run 13:50	
	10 definitely seemed like he was under the influence of 13:47	10 out very quickly. It wasn't inviting -- it was 13:50	
	11 something. 13:47	11 very -- yeah, it was intense. 13:50	
	12 Q. Had you ever seen Mr. Depp under the 13:47	12 Q. Okay. So Mr. Depp comes through the door 13:50	
	13 influence of anything prior to May 21st, 2016? 13:47	13 to Penthouse 5, and you hear him say something to 13:50	
	14 A. No. 13:47	14 the effect of "Get your bitch out of here," correct? 13:50	
	15 Q. Okay. 13:47	15 A. Uh-huh. 13:50	
	16 A. Yes. 13:47	16 Q. And then you ran out immediately 13:50	
	17 Q. Okay. When? 13:47	17 thereafter? 13:50	
	18 A. In the Bowery Hotel, I remember he was 13:47	18 A. Yes. 13:50	
	19 smoking marijuana. 13:47	19 Q. Okay. Did you see Mr. Depp break anything 13:50	
	20 Q. Uh-huh. 13:47	20 in Penthouse 5 in that moment, before you ran out? 13:50	
	21 A. And I saw him holding a glass of wine 13:47	21 A. No. 13:50	
	22 another time so... 13:47	22 Q. "No," you did not, correct? 13:50	
F/A, SP, Lack of Pers. Know.	23 Q. Okay. How was Mr. Depp's demeanor when he 13:47	23 A. No. 13:50	F/A, SP, Lack of Pers. Know.
	24 was smoking marijuana at the Bowery Hotel? 13:47	24 Q. Did you see Mr. Depp spill any wine in 13:50	
	25 A. Very -- yeah, just -- charming. 13:48	25 Penthouse 5 before you ran out? 13:50	
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	1 Q. Calm? 13:48	1 A. Yes. 13:50	
	2 A. Uh-huh. Calm-ish. I mean, I wouldn't 13:48	2 Q. How much wine did you see him spill? 13:50	
	3 know if that's -- there's a scale of calm -- 13:48	3 A. I don't remember. 13:50	
	4 Q. Right. 13:48	4 Q. A lot? The entire bottle? 13:51	
	5 A. -- to different people's demeanors but... 13:48	5 A. Not the entire bottle. What my -- so what 13:51	
	6 Q. So charming? 13:48	6 I remember is it was flailing and it was -- there 13:51	
	7 A. Uh-huh. 13:48	7 was definitely wine that was coming out. 13:51	
	8 Q. Violent? Was he violent? 13:48	8 Q. Would you say that being sloppy is 13:51	
	9 A. Not violent. 13:48	9 different than being combative? 13:51	
	10 Q. Okay. Was he sweet? 13:48	10 A. Yeah. I would say sloppy and combative 13:51	
	11 MS. BROOK: Objection. Leading. 13:48	11 are two different things. 13:51	
	12 THE WITNESS: He was very -- I remember 13:48	12 Q. And it's your testimony that Mr. Depp was 13:51	
	13 thinking he was very animated. 13:48	13 on May 21st, 2016, both combative and sloppy, 13:51	
	14 BY MS. VASQUEZ: 13:48	14 correct? 13:51	
	15 Q. Was he mellow? 13:48	15 A. Yeah. I would describe it that there was 13:51	
	16 A. Very mellow. 13:48	16 a little bit of both of -- yes, that combative and 13:51	
	17 Q. But animated, how so? 13:48	17 sloppy. 13:51	
	18 A. Just -- you know, he was -- he was 13:48	18 Q. Was he more sloppy than he was combative? 13:51	
	19 interacting with us. He was hanging out, 13:49	19 A. It felt more combative than sloppy. 13:51	
	20 interacting and... 13:49	20 Q. And just to clarify, the only thing that 13:51	
	21 Q. On May 21st, 2016 -- 13:49	21 was combative was the words he was speaking? 13:51	
	22 A. He was present. Like, he was very 13:49	22 A. No. It was his -- completely the way he 13:51	
	23 present, like hanging out. 13:49	23 entered into the room, rushed in, his energy, the 13:51	
	24 Q. Okay. And on May 21st, 2016, how was 13:49	24 way it felt like he was coming after me, like he -- 13:51	
	25 Mr. Depp's demeanor different? 13:49	25 almost felt like -- from my -- from where I was 13:51	
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F/A, SP, Lack of Pers. Know.	1 standing, it felt like he was charging towards me, 13:51	1 "QUESTION: And what did you do 13:54	F/A, SP, Lack of Pers. Know
	2 and I was scared. It was -- it felt -- it felt -- 13:52	2 after he said "Get out"? 13:54	
	3 yeah, combative. It felt -- I'm trying to look for 13:52	3 "ANSWER: Ran out. 13:54	
	4 another word that can describe what I felt, but it 13:52	4 "QUESTION: And where did you go? 13:54	
	5 was -- you know, it was scary. My heart was beating 13:52	5 "ANSWER: Ran out the door where 13:54	
	6 really fast, very quickly, and I was freaked out. 13:52	6 behind where there is a little workout	
F/A, SP, Lack of Pers. Know	7 Q. When you exited Penthouse 5, did you see 13:52	7 room kind of by the pool."	F/A, SP, Lack of Pers. Know
	8 what happened to Josh and what Josh did or -- where 13:52	8 THE REPORTER: Slow down a little bit,	
	9 he was? 13:52	9 please.	
	10 A. No. 13:52	10 THE WITNESS: Sorry?	
	11 Q. Okay. When you left Penthouse 5, was Josh 13:52	11 THE REPORTER: Slow down a little bit.	
	12 still in Penthouse 5 with Mr. Depp and his 13:52	12 THE WITNESS: Sorry.	
F/A, SP, Lack of Pers. Know	13 bodyguards? 13:52	13 [Reading cont'd]:	F/A, SP, Lack of Pers. Know
	14 A. From what I remember, he was still there, 13:52	14 "QUESTION: Is that Amber and 13:54	
	15 yeah. 13:52	15 Johnny's workout room? 13:54	
	16 Q. Okay. Did you hear Mr. Drew say anything 13:52	16 "ANSWER: The building's workout 13:54	
	17 to Mr. Depp? 13:52	17 room. 13:55	
	18 A. I don't remember hearing him say anything. 13:52	18 "QUESTION: And how long did you 13:55	
F/A, SP, Lack of Pers. Know	19 Q. Okay. So you ran out of Penthouse 5; 13:52	19 stay up near the workout room? 13:55	F/A, SP, Lack of Pers. Know
	20 where did you go? 13:52	20 "ANSWER: I don't -- I don't -- I 13:55	
	21 A. I went up the stairs to -- there was a 13:52	21 don't remember. Less than ten minutes, 13:55	
	22 pool on the roof with, like, a workout room, and I 13:53	22 maybe less than 15 minutes." 13:55	
	23 just went up the stairs and turned to the left and, 13:53	23 BY MS. VASQUEZ: 13:55	
	24 kind of, just stayed there. I hid, essentially. 13:53	24 Q. Okay. Would you agree with me that your 13:55	
F/A, SP, Lack of Pers. Know	25 Q. Did you go into the room where the workout 13:53	25 testimony in July of 2016 is different than the 13:55	F/A, SP, Lack of Pers. Know
	Page 126	Page 128	
	1 room was or... 13:53	1 testimony you just gave today, that you were in the 13:55	
	2 A. I don't remember if I went into that room 13:53	2 workout room for an hour? Less than an hour? 13:55	
	3 or if I was just close to it. 13:53	3 MS. GOLDSTEIN: Objection. One moment. 13:55	
	4 Q. Okay. What did you hear, if anything, 13:53	4 I thought you were misstating testimony 13:55	
F/A, SP, Lack of Pers. Know	5 while you were there? 13:53	5 when you said for an hour. But when you corrected 13:55	F/A, SP, Lack of Pers. Know
	6 A. I don't remember. I don't remember what I 13:53	6 it to less than an hour, that's accurate. 13:55	
	7 heard after that. 13:53	7 MS. VASQUEZ: Okay. 13:55	
	8 Q. Could you hear anything? 13:53	8 THE WITNESS: What she said. I corrected 13:55	
	9 A. I feel like initially, yes, and then 13:53	9 it to less than an hour. So are you -- 13:55	
	10 perhaps no, because then it -- I think it got quiet. 13:53	10 What is the question? 13:55	
F/A, SP, Lack of Pers. Know	11 Q. Approximately how long do you think you 13:53	11 MS. VASQUEZ: Do you mind repeating the 13:55	F/A, SP, Lack of Pers. Know
	12 were in that room adjacent to the pool? 13:53	12 question? Thank you. 13:55	
	13 A. I was hiding in that area. I don't 13:53	13 (The following record was read: 13:55	
	14 remember if I was in the room or if I was next to 13:53	14 "QUESTION: Would you agree with me 13:55	
	15 it. 13:53	15 that your testimony in July of 2016 is 13:55	
	16 I mean, I think less than an hour. Maybe 13:53	16 different than the testimony you just 13:55	
F/A, SP, Lack of Pers. Know	17 more like 20 to 30 minutes, I'm assuming. But I 13:53	17 gave today, that you were in the 13:55	F/A, SP, Lack of Pers. Know
	18 don't specifically remember how long I was there. 13:54	18 workout room for an hour? Less than an 13:55	
	19 Q. Let's direct your attention to your 13:54	19 hour?") 13:56	
	20 deposition that was taken May -- excuse me, 13:54	20 THE WITNESS: Yeah. I would agree that 13:56	
	21 July 2016. 13:54	21 this is different than what I just said, and I'm 13:56	
	22 A. [Witness complies]. 13:54	22 doing the best I can to remember the specific 13:56	
F/A, SP, Lack of Pers. Know	23 Q. Page 43, if you could start reading out 13:54	23 details. 13:56	F/A, SP, Lack of Pers. Know
	24 loud from Line 15? 13:54	24 BY MS. VASQUEZ: 13:56	
	25 A. [Reading]: 13:54	25 Q. I understand that. 13:56	
	Page 127	Page 129	

1 A. So... 13:56
2 Q. And I appreciate that you are doing the 13:56
3 best you can. 13:56
4 A. Uh-huh. 13:56
5 Q. Would you agree with me also that your 13:56
6 testimony in July of 2016, since it was closer in 13:56
7 time to the incident on May 21st, 2016, is accurate 13:56
8 or more accurate than the testimony you just gave 13:56
9 that you were possibly in the workout room for less 13:56
10 than an hour? 13:56
11 A. Uh-huh. I corrected myself to say less 13:56
12 than 30 minutes, which, I mean, could imply -- yeah, 13:56
13 so maybe then I was more clear that was a shorter 13:56
14 amount of time and now, I am thinking that it was -- 13:56
15 looking back, the timing, I don't remember as -- as 13:56
16 well. 13:56
17 Q. Okay. 13:56
18 A. Probably had more of a memory at this 13:56
19 point [witness indicates document]. 13:56
20 Q. Okay. So in July of 2016, just to make 13:56
21 the record really clear, your memory was probably 13:56
22 better than it is now, correct? 13:57
23 A. I would say yes. And also, I could -- you 13:57
24 know, again, like, I'm not sitting in deposition 13:57
25 rooms on a -- ever basis. So I -- I see that that's 13:57
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1 "Where are you?" And -- or maybe she said to me, 13:58
2 "Where are you?" I had my phone. So I just 13:58
3 remember texting something about "Where are you?" 13:58
4 And then she -- her saying something to the -- to 13:58
5 the manner of "Come to my apartment." 13:58
6 BY MS. VASQUEZ: 13:58
7 Q. Okay. You testified that you had your 13:58
8 phone. Did you have your phone in a pocket on 13:59
9 May 21st, 2016, or were you holding your phone when 13:59
10 Johnny came into the penthouse? 13:59
11 A. I don't remember. 13:59
12 Q. Is it your -- or was it your practice in 13:59
13 2016 to put your phone in a pocket? 13:59
14 MS. GOLDSTEIN: Objection. 13:59
15 MS. BROOK: Objection. Assumes facts. 13:59
16 THE WITNESS: I don't remember. 13:59
17 BY MS. VASQUEZ: 13:59
18 Q. You don't remember? 13:59
19 A. I could have put it in a back pocket if I 13:59
20 was wearing jeans. I don't remember what I was 13:59
21 wearing. I don't remember if I grabbed -- what I 13:59
22 grabbed and how I grabbed it. But I do remember 13:59
23 having my phone. I don't remember how I got 13:59
24 anywhere. 13:59
25 Q. So you don't remember if you had time to 13:59
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F/A, SP,
Lack of Pers.
Know.,
Cumulative

F/A, SP, Lack of
Pers. Know.,
Cumulative

1 what I said there, and I'm not -- I'm still not 13:57
2 sure. 13:57
3 Like, I can't say for sure that I'm, like, 13:57
4 "Oh, yeah, that's -- that's" -- I'm remembering now 13:57
5 that it was that amount of time. So seeing that, 13:57
6 yes, but doesn't help me remember any more than... 13:57
7 Q. Okay. So I assume at some point after you 13:57
8 were near or in the workout room on May 21st, 2016, 13:57
9 you left, correct? You came out of the hiding spot? 13:58
10 A. Uh-huh. 13:58
11 Q. Is that right? 13:58
12 A. Uh-huh. 13:58
13 Q. Verbal answers, please. 13:58
14 A. Yes. Yes. 13:58
15 Q. Thanks. 13:58
16 What happened next, if you remember? 13:58
17 A. I remember going into Raquel and Josh's 13:58
18 penthouse apartment. 13:58

1 grab your phone before leaving the penthouse when 13:59
2 Johnny came in? 13:59
3 A. Uh-huh. 13:59
4 Q. Is that your testimony? You don't 13:59
5 remember one way or the other? 13:59
6 MS. BROOK: Objection. Misstates the 13:59
7 testimony. 13:59
8 MS. GOLDSTEIN: Join. 13:59
9 THE WITNESS: I don't remember. 13:59
10 BY MS. VASQUEZ: 14:00

F/A, SP, Lack of
Pers. Know.,
Cumulative

19 Q. Okay. Do you recall if you left the 13:58
20 workout room or that area by yourself, or were you 13:58
21 summoned with a text message, or did somebody come 13:58
22 get you? 13:58
23 A. I -- 13:58
24 MS. BROOK: Objection. Leading 13:58
25 THE WITNESS: I remember texting Raquel, 13:58
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11 Q. Do you remember thinking to yourself, "I 14:00
12 might need this," so grabbing your cellphone before 14:00
13 leaving the apartment? 14:00
14 A. It feels like I was probably already 14:00
15 holding it. I mean, I left very abruptly. I don't 14:00
16 remember ever being like, "Oh, my God" -- there was 14:00
17 no, "Oh, my God, I need to find my phone," it was 14:00
18 like "Get the fuck out of here." 14:00
19 So I am assuming that my phone was in my 14:00
20 hand or in my pocket. 14:00
21 Q. Okay. So after you exchanged some text 14:00
22 messages with Ms. Pennington, you came out of your 14:00
23 hiding spot and then went to Ms. Pennington and 14:00
24 Mr. Drew's penthouse; is that correct? 14:00
25 A. Right. Correct. 14:00
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F/A, SP,
Lack of Pers.
Know.,
Cumulative

F/A, SP, Lack of
Pers. Know.,
Cumulative

F/A, SP, Lack of Pers. Know., Cumulative

F/A, SP, Lack of Pers. Know., Cumulative

F/A, SP, Lack of Pers. Know., Impr. Opinion Cumulative

1	Q. Okay. Who was in that penthouse?	14:00	1	know what I mean - I think it was -- yeah, I	14:02
2	And I will represent to you that was	14:00	2	think -- looking at her, it was on my left and her	14:02
3	Penthouse 1.	14:00	3	right side.	14:02
4	So who was in Penthouse 1 when you got out	14:00	4	Q. Okay. So let's talk about her hair seemed	14:02
5	of the hiding spot and came to Penthouse 1?	14:00	5	disheveled; is that what you said?	14:02
6	A. I don't remember who was in there in that	14:00	6	A. Uh-huh.	14:02
7	moment. Like, I don't remember specifically who was	14:00	7	Q. Her hair was disheveled?	14:02
8	in the penthouse in that moment. I think Raquel. I	14:00	8	A. Uh-huh.	14:03
9	think Raquel -- I think -- I mean, it was Josh,	14:01	9	Q. Was she crying?	14:03
10	Raquel, Amber, and I were the people that were, at	14:01	10	A. Yeah. There was definitely tears.	14:03
11	some point, in there during that time.	14:01	11	Q. Okay. Was she shaking?	14:03
12	Q. Okay. Do you remember the first time you	14:01	12	A. She --	14:03
13	saw Ms. Heard after this incident?	14:01	13	MS. BROOK: Objection. Leading.	14:03
14	A. I remember seeing her after the -- that	14:01	14	THE WITNESS: I mean, I don't remember	14:03
15	incident and it was in the -- that apartment.	14:01	15	specifically, like, how -- what types of movements.	14:03
16	Q. In Penthouse 1?	14:01	16	I don't remember her movements, her body movements.	14:03
17	A. Correct.	14:01	17	BY MS. VASQUEZ:	14:03
18	Q. Okay.	14:01	18	Q. I mean, was she animated?	14:03
19	MS. BROOK: Well, objection. It was in	14:01	19	A. Yeah. She was visibly really upset.	14:03
20	the apartment where -- I believe she testified it	14:01	20	Q. Okay. So visibly very upset means what?	14:03
21	was in the apartment where Mr. Drew and --	14:01	21	She was crying?	14:03
22	MS. VASQUEZ: Which is Penthouse 1?	14:01	22	A. Uh-huh.	14:03
23	MS. BROOK: -- Ms. Pennington lived.	14:01	23	Q. Okay. And what else?	14:03
24	BY MS. VASQUEZ:	14:01	24	A. Tears, sadness, felt like confusion. Felt	14:03
25	Q. Is that correct?	14:01	25	like -- those were the main things that happen.	14:03
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1	A. Correct. It was in Raquel and Josh's	14:01	1	Q. Would you describe her as catatonic in	14:03
2	apartment is when I first saw her.	14:01	2	this case?	14:03
3	Q. And I will represent to you that that was	14:01	3	A. Describe what catatonic means to you.	14:03
4	Penthouse 1.	14:01	4	How --	14:03
5	A. Got it.	14:01	5	Q. Do you know what catatonic means?	14:03
6	Q. Okay. So the first time you saw Ms. Heard	14:01	6	A. I mean, yeah, why don't you give me -- no.	14:03
7	after this incident on May 21st, 2016, was in	14:01	7	What is the definition?	14:04
8	Penthouse 1. What do you recall seeing -- the first	14:01	8	Q. Yeah. I mean, immobile, unresponsive.	14:04
9	thing you saw when you saw Ms. Heard?	14:01	9	Did she seem unresponsive to you, Ms. Heard?	14:04
10	A. I just remembered she looked really upset	14:01	10	A. No. She didn't seem unresponsive.	14:04
11	and disheveled, and her hair was a mess, and she had	14:02	11	Q. Did she seem immobile to you?	14:04
12	like swollen face.	14:02	12	A. No.	14:04
13	Q. Okay.	14:02	13	Q. Catatonic means, like, almost in a coma.	14:04
14	A. Red -- she had a red swollen face.	14:02	14	A. Yeah.	14:04
15	Q. Okay. Had you ever seen Ms. Heard cry	14:02	15	Q. Right?	14:04
16	before May 21, 2016?	14:02	16	Shocked?	14:04
17	A. I don't think so. Not that I can	14:02	17	A. Right.	14:04
18	remember.	14:02	18	Q. Okay. She didn't seem that way to you,	14:04
19	Q. Okay. What side of her face was swollen?	14:02	19	correct?	14:04
20	A. I think it was her right side of her face.	14:02	20	A. She didn't seem immobile; she did seem	14:04
21	Q. Do you have an independent recollection	14:02	21	shocked.	14:04
22	that it was the right side of her face that was	14:02	22	Q. Okay. But she was crying?	14:04
23	swollen?	14:02	23	A. Uh-huh.	14:04
24	A. I'm taking myself back there and trying to	14:02	24	Q. Upset?	14:04
25	remember, like, where I was standing versus - you	14:02	25	A. Uh-huh.	14:04
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1 Q. Animated? 14:04
 2 A. Uh-huh. 14:04
 3 Q. Correct? 14:04
 4 A. Crying, upset, from what I remember, sad, 14:04
 5 really sad -- 14:04
 6 Q. Okay. 14:04
 7 A. -- and confused. 14:04
 8 Q. All right. What did she say to you, if 14:04
 9 anything? 14:04
 10 A. I don't remember. 14:04
 11 Q. What did Ms. Pennington say to you, if 14:04
 12 anything? 14:04
 13 A. I mean, I just remember hearing about 14:04
 14 there was -- what I remember is that they're -- 14:04
 15 Raquel entered, they were fighting, he was being 14:04
 16 violent towards her, Raquel got in the middle of 14:05
 17 them, and that some sort of -- a phone -- a phone 14:05
 18 was thrown at her face. And Raquel was sort of, 14:05
 19 like, the barrier in between -- and I just remember 14:05
 20 it being like, you know, Amber really grateful that 14:05
 21 Raquel had entered into the room because she was in 14:05
 22 a vulnerable position. And that was sort of what -- 14:05
 23 the conversation was sort of just in regards to the 14:05
 24 events that had just happened so... 14:05
 25 Q. Do you recall whether Raquel told you that 14:05

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1 A. I don't know specifically, but from what I 14:07
 2 was told, it was i.O. 14:07
 3 Q. Was i.O. there on May 21st, 2016, at the 14:07
 4 Eastern Columbia building? 14:07
 5 A. No. 14:07
 6 Q. Okay. Who told you that i.O. called the 14:07
 7 police? 14:07
 8 A. I don't remember who told me. 14:07
 9 Q. Was there a discussion amongst you, 14:07
 10 Mr. Drew, Ms. Pennington, and Ms. Heard to call the 14:07
 11 police on May 21st, 2016? 14:07
 12 A. Was there a discussion between us to call 14:07
 13 the police? 14:07
 14 Q. Uh-huh. 14:07
 15 A. No. Because the police had already been 14:07
 16 called. It sounds like -- they were called -- they 14:07
 17 came -- they arrived shortly after we were all in 14:07
 18 the unit, PH 1, together. So it was my 14:07
 19 understanding i.O. called the police. We didn't 14:07
 20 talk about calling the police. i.O. apparently had 14:08
 21 called the police. 14:08
 22 Q. Okay. So your testimony is when you 14:08
 23 entered Penthouse 1 where Ms. Heard was visibly 14:08
 24 upset, you had no discussions about calling the 14:08
 25 police? 14:08

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H

1 she saw Mr. Depp throw a phone at Ms. Heard? 14:05
 2 A. I don't recall. 14:05
 3 Q. What did Mr. Drew say, if anything? 14:05
 4 A. I don't remember him saying -- what he 14:05
 5 said, I think everybody was just shaken up. 14:05
 6 Q. Did Ms. Pennington tell you that Mr. Depp 14:05
 7 had assaulted her that evening? 14:06
 8 A. She mentioned that he had -- was yelling 14:06
 9 at her. And that, you know, it felt very violent -- 14:06
 10 yeah, it was violent, but he didn't assault -- I 14:06
 11 don't -- I don't remember her telling me that he 14:06
 12 assaulted her. 14:06
 13 Q. You don't remember Ms. Pennington telling 14:06
 14 you that Mr. Depp slapped her hand away, did you? 14:06
 15 A. I don't remember. 14:06
 16 Q. Okay. So what happened next? After you 14:06
 17 go into Penthouse 1, what happened next? 14:06
 18 A. I remember that there -- there was a 14:06
 19 couple of police officers that showed up who I -- 14:06
 20 that stayed in the hallway, and I think I might have 14:06
 21 seen one of them. But they didn't come into the 14:07
 22 unit that I was in, so I didn't hear any 14:07
 23 conversation that happened there. 14:07
 24 Q. Okay. Let's back up. 14:07
 25 Who called the police on May 21st, 2016? 14:07

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1 A. We did not talk about calling the police. 14:08
 2 Q. Okay. Was it your impression when you 14:08
 3 entered Penthouse 1 that the police already had been 14:08
 4 called? 14:08
 5 A. I don't remember. I just remember them 14:08
 6 coming soon after. 14:08
 7 Q. So soon after you went into Penthouse 1, 14:08
 8 you remember some police officers coming? 14:08
 9 A. I remember -- yeah. I remember there was 14:08
 10 police officers in the hallway. Uh-huh. 14:08
 11 Q. Okay. When you were in Penthouse 1, did 14:08
 12 you see Mr. Drew leave at any time before the police 14:08
 13 came? 14:08
 14 A. I don't remember. 14:08
 15 Q. You don't remember him leaving? 14:08
 16 A. I don't remember. I mean, I'm sure he 14:08
 17 did. I'm sure he left at some point, but I don't 14:08
 18 remember -- 14:09
 19 Q. Why are you sure that he left at some 14:09
 20 point before the police arrived? 14:09
 21 A. I don't know. I don't know. 14:09
 22 Q. Did you see Ms. Pennington leave 14:09
 23 Penthouse 1 before the police arrived? 14:09
 24 A. I don't remember. 14:09
 25 Q. Did you see Ms. Heard leave Penthouse 1 14:09

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36 (Pages 138 - 141)

F/A, SP, Lack of Pers. Know., Cumulative	1	before the police arrived on May 21st, 2016?	14:09		
	2	A. I don't remember.	14:09		
	3	Q. Was Ms. Heard icing her face after the	14:09		
	4	incident, but before the police arrived?	14:09		
	5	A. I think so.	14:09		
	6	Q. Who gave her the ice?	14:09		
	7	A. I don't remember.	14:09		
	8	Q. So you were in Penthouse 1 when the police	14:09		
	9	came. How do you know that they came? What did you	14:09		
	10	hear? What did you see?	14:10		
	11	A. Because it -- they said the police are	14:10		
	12	here so I --	14:10		
	13	Q. Who said that?	14:10		
	14	A. I don't remember. Again, this is a very	14:10		
	15	long time ago so specific details are going to be	14:10		
	16	really hard for me to remember.	14:10		
	17	Q. Okay.	14:10		
	18	A. I just know -- knowing that the police	14:10		
	19	were there in the hallway, two of them.	14:10		
F/A, SP, Lack of Pers. Know., Cumulative	20	Q. Okay. Was it a man and a woman?	14:10		
	21	A. I don't remember.	14:10		
	22	Q. Okay. Did you at any point before the	14:10		
	23	police came leave Penthouse 1?	14:10		
	24	A. Not that I can remember.	14:10		
	25	Q. Okay. So you are in Penthouse 1 with	14:10		
			Page 142		
	1	Ms. Pennington, Mr. Drew, and Ms. Heard, and the	14:10		
	2	police come, two police officers, correct?	14:10		
	3	A. Correct.	14:10		
	4	Q. And how much time elapsed between you	14:10		
	5	going into Penthouse 1 and the police coming?	14:10		
	6	A. I don't know. I don't remember. Maybe	14:10		
	7	30 minutes, to two an -- yeah, 30 minutes or so.	14:11		
	8	Around that. More or less.	14:11		
	9	Q. Okay. And while you were in Penthouse 1	14:11		
	10	with Ms. Heard and Ms. Pennington and Mr. Drew	14:11		
	11	waiting for the police to arrive, what were you	14:11		
	12	doing?	14:11		
	13	A. Talking about what had just happened.	14:11		
	14	Q. Was Amber holding Mr. Depp's cellphone?	14:11		
	15	Do you recall?	14:11		
	16	A. I don't remember. I don't remember.	14:11		
F/A, SP, Lack of Pers. Know., Cumulative	17	Q. Okay. And just -- I know that you don't	14:11		
	18	remember a lot of details about that night, but your	14:11		
	19	testimony so far has been that you were hiding	14:11		
	20	perhaps for 15, 20 minutes, less than an hour,	14:12		
	21	correct?	14:12		
	22	A. Uh-huh.	14:12		
	23	Q. And then the police came 30 minutes after	14:12		
	24	you went back into Penthouse 1, after the incident;	14:12		
	25	was that correct?	14:12		
			Page 143		
	1	A. Again, I don't remember timing. So it's	14:12		
	2	all speculation. I don't remember timing.	14:12		
	3	Q. But in terms of your best recollection	14:12		
	4	today, as you sit here today, your testimony is that	14:12		
	5	the police came some time about 30 minutes after you	14:12		
	6	went back into Penthouse 1, correct?	14:12		
	7	A. I don't remember the timing, but they came	14:12		
	8	after I entered into Penthouse 1.	14:12		
	9	Q. Okay. Was it more than 30 minutes?	14:12		
	10	A. I don't remember.	14:12		
	11	MS. GOLDSTEIN: Counsel, when you get to	14:12		
	12	the end of the line of questioning, we have been	14:12		
	13	going for, like, an hour and ten minutes. I think	14:12		
	14	it would be good for a little break.	14:12		
	15	MS. VASQUEZ: Okay.	14:12		
	16	BY MS. VASQUEZ:	14:13		
	17	Q. So when you previously testified that the	14:13		
	18	police came about 30 minutes after you entered	14:13		
	19	Penthouse 1, were you guessing? Was that a fair	14:13		
	20	estimate?	14:13		
	21	A. I think I was -- yeah, I think I was	14:13		
	22	probably estimating -- I mean, as I have been doing	14:13		
	23	this whole time because I have been very clear, I	14:13		
	24	don't remember the timing of things because this was	14:13		
	25	over - how many years ago - four, five years --	14:13		
			Page 144		
F/A, SP, Lack of Pers. Know., Cumulative	1	Q. Right.	14:13		
	2	A. I don't remember specific timing.	14:13		
	3	Q. Okay. So you were giving me --	14:13		
	4	A. So I was guessing. I was guessing. I	14:13		
	5	apologize.	14:13		
	6	I was guessing that it was around	14:13		
	7	30 minutes. But, again, I -- I don't know, so I --	14:13		
	8	I will retract that and say I don't know.	14:13		
	9	MS. VASQUEZ: Okay. You want to take a	14:13		
	10	short break?	14:13		
	11	MS. GOLDSTEIN: Yeah. Just a short break.	14:13		
	12	MS. VASQUEZ: Yeah. Of course.	14:13		
	13	MS. GOLDSTEIN: Thank you.	14:13		
	14	THE VIDEOGRAPHER: This marks the end of	14:13		
	15	Media Number 2. Going off the record at 2:14 p.m.	14:13		
	16	(Brief recess.)	14:26		
	17	THE VIDEOGRAPHER: This marks the	14:26		
	18	beginning of Media Number 3. Going back on the	14:26		
	19	record at 2:27 p.m.	14:26		
	20	BY MS. VASQUEZ:	14:26		
	21	Q. Ms. Marz, I understand we just took a	14:27		
	22	quick break, so I assume the answer to my question:	14:27		
	23	Did you meet with anybody besides your lawyer during	14:27		
	24	that break is "no"?	14:27		
	25	A. No.	14:27		
			Page 145		

1 Q. "No." 14:27
2 So when first two police officers came to 14:27
3 the penthouse on May 21st, 2016, you were inside 14:27
4 Penthouse 1, correct? 14:27
5 A. Correct. 14:27
6 Q. Okay. And did Mr. Drew open the door and 14:27
7 walk out of Penthouse 1 to meet with the police 14:27
8 officers when they came; is that your recollection? 14:27
9 A. I don't remember who -- 14:27
10 Q. Then -- 14:27
11 A. Who met with them or who walked out. 14:27
12 Q. Okay. Did the police officers, to your 14:27
13 recollection, come into Penthouse 1 at any point? 14:27
14 A. Not to my recollection, no. 14:27
15 Q. Okay. So it's safe to assume that 14:27
16 somebody, besides you, walked out of Penthouse 1 and 14:28
17 spoke with the police officers, correct? 14:28
18 A. Correct. 14:28
19 Q. Did you see Ms. Heard leave Penthouse 1 to 14:28
20 speak with the police officers? 14:28
21 MS. BROOK: Objection. Calls for 14:28
22 speculation. 14:28
23 THE WITNESS: I don't remember. 14:28
24 BY MS. VASQUEZ: 14:28
25 Q. Did you see Ms. Heard speak to the police 14:28
Page 146
1 officers at any point on May 21st, 2016? 14:28
2 A. Yes. 14:28
3 Q. Okay. At what point do you remember 14:28
4 Ms. Heard speaking to the police officers on May 14:28
5 21st, 2016? 14:28
6 A. I remember the second -- there were two 14:28
7 sets of officers that came. 14:28
8 Q. Uh-huh. 14:28
9 A. The second set I remember Amber speaking 14:28
10 to. 14:28
11 Q. And you don't remember one way or the 14:28
12 other if she spoke, Ms. Heard spoke to the first set 14:28
13 of police officers that came on May 21st, 2016? 14:28
14 A. I don't remember. 14:28
15 Q. Okay. But it's possible that she spoke to 14:28
16 the first police officers and the second set of 14:28
17 police officers that came on May 21st, 2016, 14:28
18 correct? 14:29
19 MS. BROOK: Objection. Calls for 14:29
20 speculation. 14:29
21 THE WITNESS: It's possible. 14:29
22 BY MS. VASQUEZ: 14:29
23 Q. Okay. Do you recall if Mr. Drew spoke to 14:29
24 either sets of the police officers that came on May 14:29
25 21st, 2016? 14:29
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F/A, SP, Lack of
Pers. Know.,
Cumulative

F/A, SP, Lack of
Pers. Know.,
Cumulative

F/A, SP, Lack of
Pers. Know.,
Cumulative

1 MS. BROOK: Objection. Lacks foundation. 14:29
2 THE WITNESS: It's possible. 14:29
3 BY MS. VASQUEZ: 14:29
4 Q. Okay. Do you recall if Ms. Pennington 14:29
5 spoke to the police officers that came on May 21st, 14:29
6 2016? 14:29
7 MS. BROOK: Same objection. 14:29
8 THE WITNESS: It's possible. 14:29
9 BY MS. VASQUEZ: 14:29
10 Q. Okay. Did you speak to any of the police 14:29
11 officers that came on May 21st, 2016? 14:29
12 A. No. 14:29
13 Q. Is there a reason you didn't speak to the 14:29
14 police officers? 14:29
15 A. Not specifically. 14:29
16 Q. Isn't it your testimony that Mr. Depp -- 14:29
17 you felt frightened by Mr. Depp and he charged at 14:29
18 you? 14:29
19 A. Yeah. 14:29
20 Q. Did you not think that that was important 14:29
21 to relay to the police officers on May 21st, 2016? 14:29
22 A. I didn't -- it was -- yeah, it didn't feel 14:30
23 like that was the most important thing for -- for 14:30
24 the time period that the police officers were there. 14:30
25 I think it was more focused on some -- Amber -- 14:30
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1 yeah, there was not an opportunity, slash, did I 14:30
2 feel like -- yeah, I guess I don't know. I guess I 14:30
3 could have. Very well could have. 14:30
4 Q. But you didn't, correct? 14:30
5 A. But I did not. 14:30
6 Q. All right. At any point in the evening on 14:30
7 May 21st, 2016, did you hear Ms. Heard speak with a 14:30
8 woman by the name of Samantha Spector? 14:30
9 A. I do not know. 14:30
10 Q. Did you hear Ms. Heard speak with her 14:30
11 attorney on the evening of May 21st, 2016? 14:30
12 MS. BROOK: Objection. Assumes facts. 14:30
13 Lack of personal knowledge. 14:30
14 THE WITNESS: I did hear Ms. -- I did hear 14:30
15 Amber on the phone. I don't know who she was 14:30
16 speaking to. 14:30
17 BY MS. VASQUEZ: 14:30
18 Q. What do you recall about Amber's 14:30
19 conversation with whoever she was on the phone with 14:31
20 on the evening of May 21st, 2016? 14:31
21 A. I remember that she was -- from what I 14:31
22 remember, it was conversation of, you know, it -- 14:31
23 "Do I need to do something about this now" type of a 14:31
24 thing. "Do I need to speak up about this?" "Do I 14:31
25 need to get -- take action against this?" That's 14:31
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F/A, SP, Lack
of Pers. Know.

F/A, SP, Lack
of Pers. Know.

F/A, SP, Lack
of Pers. Know.

F/A, SP, Lack
of Pers.
Know.

F/A, SP, Lack of Pers. Know.	1	kind of what I remember.	14:31	1	career?	14:34	F/A, SP, Lack of Pers. Know., H		
	2	Q. When Ms. Heard was speaking to whoever on	14:31	2	A. Not anything about a career. It was --	14:34			
	3	the phone about taking action, speaking up about	14:31	3	from my perspective, it was more -- it felt like	14:34			
	4	this, was it after the police had been called?	14:31	4	this has been happening for a while. Like after I	14:34			
	5	A. From my -- from my recollection, it was --	14:31	5	experienced that, it was, like, what -- what was	14:34			
	6	from my knowledge, the police were called by I.O.	14:31	6	said on the phone and what was being talked about	14:34			
	7	previously during the altercation at the time when	14:31	7	was, like, from my perspective, this was not the	14:34			
	8	Amber and Johnny were in the apartment. So I am	14:31	8	first time she had been, you know, physically, you	14:34			
	9	assuming that it was after the police were called	14:31	9	know, abused by him in some way.	14:34			
	10	that this conversation was being had.	14:32	10	And so it was, like, how long is this	14:34			
	11	Q. Okay. Do you recall Ms. Heard having	14:32	11	going to go on for, type of thing, before reporting	14:34			
	12	multiple conversations on the phone with multiple	14:32	12	this. And it -- you know, these are celebrities we	14:34			
	13	people, or do you just recall that one conversation?	14:32	13	are talking about, so it's, you know, a big deal to	14:34			
	14	A. I recall that one conversation. I don't	14:32	14	say to the press and to go and file for any type of	14:34			
	15	remember if there were multiple conversations.	14:32	15	a thing.	14:34			
	16	Q. Did Ms. Heard ever tell you on May 21st,	14:32	16	So I think she was at a crossroads because	14:34			
	17	2016 that her lawyer advised her to report the	14:32	17	I think she truly loved him and cared about him.	14:34			
	18	domestic violence that had allegedly occurred?	14:32	18	And from my perspective, it almost felt like -- I've	14:34			
	19	A. She did not tell me that. No.	14:32	19	never experienced someone that has been abused in a	14:34			
	20	Q. Did she tell you, Ms. Heard, that her	14:32	20	relationship, but I think -- from what I have been	14:34			
	21	publicist, Jodi Gottlieb had advised her to report	14:32	21	told, a lot of people try to cover it up a little	14:34			
	22	the alleged domestic violence that had occurred on	14:32	22	bit and defend their partner.	14:34			
	23	May 21st, 2016?	14:32	23	And so from my perspective, it felt like	14:35			
	24	MS. BROOK: Objection. Assumes facts.	14:32	24	she was at a crossroads of, like, "Do I come out	14:35			
	25	Lacks foundation.	14:32	25	with this? This is a big deal. These are like --	14:35			
	Page 150			Page 152					
	F/A, SP, Lack of Pers. Know., H	1	THE WITNESS: No. She did not	14:32	1	this is a celebrity. This is -- you know, I'm a		14:35	F/A, SP, Lack of Pers. Know., H
		2	specifically tell me any of that stuff.	14:32	2	celebrity. Like what -- how much do I want to		14:35	
		3	BY MS. VASQUEZ:	14:32	3	share? And when and how?"		14:35	
		4	Q. Even though she may not have specifically	14:32	4	And like it -- you know, like a discussion		14:35	
5		told you, did you hear or do you remember hearing	14:32	5	was being had.	14:35			
6		Ms. Heard tell the group, whether it was you,	14:32	6	Q. You said that it appeared to you that	14:35	F/A, SP, Lack of Pers. Know., H		
7		Mr. Drew, Ms. Pennington, that her attorney or her	14:33	7	Ms. Heard had been experiencing this domestic	14:35			
8		publicist advised her to report the sexual abuse --	14:33	8	violence for a while?	14:35			
9		excuse me, the domestic abuse by Mr. Depp?	14:33	9	A. In that moment, it had appeared to me	14:35			
10		MS. BROOK: Same objections.	14:33	10	because from what I heard from the conversations, it	14:35			
11	THE WITNESS: What I remember is that	14:33	11	was, like, this feeling of how much longer can this	14:35				
12	there was hesitation around whether or not she	14:33	12	go on for that. Like, she is continuing to be hurt	14:35				
13	wanted to put this out into the world because it	14:33	13	and not speak up about it. And --	14:35				
14	would mean the end of their relationship, from her	14:33	14	Q. Were -- sorry.	14:35				
F/A, SP, Lack of Pers. Know., H	15	perspective. And I could -- I felt like she wasn't	14:33	15	A. That is okay.	14:35			
	16	sure if that's -- if she was -- you know, I mean, I	14:33	16	Q. Were you surprised by that --	14:35			
	17	think from my perspective, she was scared to do that	14:33	17	A. Yeah.	14:35			
	18	for the aftermath of what that could mean. So I did	14:33	18	Q. -- revelation?	14:35			
	19	feel there was uncertainty around what she was going	14:33	19	A. Yeah. I was surprised by it, yeah.	14:35			
	20	to do so she was talking to people.	14:33	20	Q. Were you upset with your friend	14:35			
	21	BY MS. VASQUEZ:	14:33	21	Ms. Pennington for not telling you?	14:35			
	22	Q. Was there uncertainty that you -- you	14:33	22	A. I wasn't upset with her. I wasn't mad at	14:35			
	23	know, observed about the end of her relationship	14:33	23	her. No.	14:36			
	24	with Mr. Depp or the uncertainty about the	14:33	24	Q. Were you surprised Ms. Pennington had	14:36	F/A, SP, Lack of Pers. Know., H		
25	implications it would have perhaps on Ms. Heard's	14:34	25	never shared with you that Ms. Heard was	14:36				
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F/A, SP, Lack of
Pers. Know., H

1 experiencing this terrible domestic violence at the 14:36
2 hands of her husband, Mr. Depp? 14:36
3 A. You know, I -- from what I -- I don't 14:36
4 remember when or how, but I -- I feel like there was 14:36
5 moments where I had been told bits and pieces of 14:36
6 violence, but not to the extent that I had later 14:36
7 realized was the case. 14:36
8 So it was shocking to me that it had -- 14:36
9 yeah, that it was all very shocking to me. Like, 14:36
10 what I experienced, what I saw, and then what came 14:36
11 out after that was all very shocking to me. I 14:36
12 wasn't mad at Raquel for not telling me private 14:36
13 information about somebody that I am, again, I'm 14:36
14 not -- was not super, super close to. 14:36
15 Q. But it was somebody you had known for - 14:36
16 what - going on at least 15 years, correct? 14:36
17 A. Yeah. I could see how it would look. I 14:37
18 knew -- I met Amber when I was younger, but I hadn't 14:37
19 actually really seen her or spent time with her 14:37
20 until that February when I came, you know, to move 14:37
21 to L.A. 14:37
22 So, you know, I think it's different. The 14:37
23 relationship with Raquel and I was super close on 14:37
24 and off for many years, where Amber and I's really 14:37
25 wasn't. I just would hear -- I would, you know -- 14:37

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1 I -- 14:37
2 Q. And you -- sorry. Were you done? 14:37
3 A. Yeah. I mean that's it. You know, I 14:37
4 wasn't surprised or upset, to answer your question, 14:37
5 that Raquel hadn't shared, like, details. 14:37
6 Q. And in February when you lived at the 14:37
7 penthouse for a few weeks, you didn't hear or see 14:37
8 any abuse by Mr. Depp towards Ms. Heard, correct? 14:37
9 A. Correct. 14:37
10 Q. So at some point, I assume you left 14:38
11 Penthouse 1? 14:38
12 A. Uh-huh. 14:38
13 Q. Correct? 14:38
14 A. Correct. 14:38
15 Q. And did you go to Amber and Johnny's 14:38
16 penthouse thereafter, or where did you go next? 14:38
17 A. So I just remember at some point ending 14:38
18 up -- yes, at some point we were in their penthouse 14:38
19 afterwards, in Johnny and Amber's. 14:38
20 Q. Okay. 14:38
21 A. At some point we went over there. 14:38
22 Q. And did you go over there, you think, 14:38
23 after the police came? 14:38
24 A. It was after the first two police officers 14:38
25 came. 14:38

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1 Q. Okay. And when you got to the penthouse, 14:38 F/A, SP, Lack
2 what did you see? 14:38 of Pers., Know.
3 A. I don't remember. 14:38

4 Q. Do you remember glass on the floor? 14:38
5 A. At this point in time, I don't remember 14:38
6 what I saw. I don't remember if it was cleaned up 14:38
7 by the time I got there or if there was glass on the 14:38
8 floor when I walked in. 14:38

9 Q. Do you recall seeing wine spilled? 14:38 F/A, SP, Lack
10 A. I recall seeing wine spilled in the 14:38 of Pers., Know.
11 hallway, like a lot of wine spilled in the hallway. 14:39

12 Q. When do you recall seeing the wine spilled 14:39
13 in the hallway? 14:39
14 A. At some point in the night. Maybe 14:39
15 after -- you know, before -- I -- I recall -- I 14:39
16 mean, I don't remember specifically, but I remember 14:39
17 seeing wine spilled in the hallway. 14:39

18 Q. Okay. 14:39
19 A. I remember that being one of the things 14:39 F/A, SP, Lack
20 that I saw that was part of the destruction of 14:39 of Pers., Know.
21 whatever happened. 14:39

22 Q. So the police come and you stayed in 14:39
23 Penthouse 1? 14:39

24 A. Uh-huh. 14:39
25 Q. Correct? 14:39

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1 A. Correct. 14:39 F/A, SP, Lack of Pers., Know.

2 Q. Okay. The police leave, the first set of 14:39
3 police officers leave. It was after the police 14:39 F/A, SP, Lack of
4 officers left that you went to Penthouse 3, correct, 14:39 Pers. Know.
5 where Amber and Johnny lived? 14:39
6 A. Correct. 14:39

7 Q. All right. And so when you got to 14:39
8 Penthouse 3, you recall seeing, perhaps, glass? 14:39
9 A. I don't remember. 14:39
10 Q. You don't remember? 14:39
11 A. Uh-huh. 14:39

12 Q. Do you remember seeing wine spilled in the 14:39 F/A, SP, Lack of
13 hallway? 14:39 Pers. Know.
14 A. I remember seeing wine spilled in the 14:39
15 hallway, yeah. 14:40

16 Q. Okay. And you saw the wine after the 14:40
17 police officers came, correct? 14:40
18 A. I think so. 14:40
19 Q. Okay. Do you recall seeing utensils on 14:40
20 the ground in Penthouse 3, where Johnny and Amber 14:40
21 lived? 14:40

22 MS. BROOK: Objection. Leading. 14:40
23 THE WITNESS: I don't remember. 14:40
24 BY MS. VASQUEZ: 14:40
25 Q. Okay. What destruction, if any, do you 14:40

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40 (Pages 154 - 157)

1 I remember seeing in Penthouse 3 where Johnny and 14:40
 2 Amber lived, after the police came? 14:40
 3 A. I remember wine spilled, and that's all I 14:40
 4 can remember at this moment -- for this moment. 14:40
 5 Q. Just -- 14:40
 6 A. All I can remember at this moment is there 14:40
 7 was wine spilled. 14:40
 8 Q. Okay. Do you think sitting here today, 14:40
 9 you would remember if the apartment was trashed, I 14:40
 10 mean, do you understand what the word "trashed" 14:40
 11 means? 14:40
 12 A. I do, yeah. 14:40
 13 Q. Yeah. 14:40

F/A, SP, Lack of Pers.
Know.

14 A. I only went into one section of the 14:40
 15 apartment, so just on the bottom level. 14:40
 16 Q. Uh-huh. 14:40

F/A, SP, Lack of Pers.
Know.

17 A. And I remember wine spilled on the floor 14:40
 18 and I remember -- I don't specifically remember -- 14:41
 19 like if you were to ask me specifically what 14:41
 20 destruction, I don't remember. 14:41

21 Q. At any point in the evening, did you take 14:41
 22 any photographs of the scene? 14:41
 23 A. No. 14:41
 24 Q. Did Josh take any photographs of the 14:41
 25 scene, to your best recollection? 14:41

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1 A. I don't remember. 14:41
 2 Q. Did Ms. Pennington take any photographs of 14:41
 3 the scene? 14:41
 4 A. I remember Raquel taking photographs of 14:41
 5 Amber's face. 14:41

F/A, SP, Lack of
Pers. Know

6 Q. At what point did Raquel take photographs 14:41
 7 of Amber's face, before or after the first set of 14:41
 8 police officers came? 14:41
 9 A. I don't remember if it was before or 14:41
 10 after. 14:41
 11 Q. Before or after Amber iced her face? Do 14:41
 12 you recall? 14:41
 13 A. I don't remember. 14:41
 14 Q. Is it your testimony -- 14:41
 15 A. I don't -- 14:41
 16 Q. I'm sorry. Go ahead. 14:41

F/A, SP, Lack of
Pers. Know

17 A. I want to retract the icing on the face 14:41
 18 because I don't remember specifically if she iced 14:41
 19 her face. I don't remember -- or, like, where -- 14:42
 20 when that happened in the sequence or if she did. 14:42
 21 Like, I think I remember that, but I'm trying to be 14:42
 22 clear that I am not specifically remembering. 14:42
 23 Q. So you want to change your testimony? 14:42
 24 A. Yeah. 14:42
 25 Q. You testified earlier today that 14:42

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1 Ms. Heard -- you saw Ms. Heard ice her face after 14:42
 2 the incident -- 14:42
 3 A. I said I think -- 14:42
 4 Q. -- on May 21st, 2016? 14:42
 5 A. -- I remember her icing her face. So -- 14:42
 6 Q. Well, the record will -- 14:42
 7 A. -- you just repeated it to me that -- like 14:42
 8 I said that, so I think I remember seeing her ice 14:42
 9 her face. 14:42
 10 Q. Safe to assume, though, if somebody 14:42
 11 experiences a cell phone being thrown at close range 14:42
 12 by a man, they would ice their face, correct? 14:42
 13 A. Exactly. Correct. 14:42
 14 MS. BROOK: Objection. Assumes facts. 14:42
 15 Calls for speculation. 14:42
 16 MS. GOLDSTEIN: Objection. Calls for 14:42
 17 speculation. 14:42
 18 MS. BROOK: And argumentative. 14:42
 19 BY MS. VASQUEZ: 14:42
 20 Q. Okay. Just to clarify, you are changing 14:42
 21 your testimony after you met with your attorney, 14:42
 22 correct? 14:42
 23 MS. BROOK: Objection. Misstates her 14:42
 24 testimony. She just told you she is making a 14:42
 25 clarification. 14:43

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1 MS. GOLDSTEIN: Join. 14:43
 2 THE WITNESS: I was making a clarification 14:43
 3 that what I said was "I think." 14:43
 4 BY MS. VASQUEZ: 14:43
 5 Q. Okay. 14:43

F/A, SP, Lack
of Pers. Know., Impr. Opin.

6 A. And I think that's what I specifically 14:43
 7 said when I said it. 14:43
 8 Q. Okay. Now, going to your description of 14:43
 9 Ms. Heard's face, you said it was the right side of 14:43
 10 her face? You said it was what? Swollen? 14:43
 11 A. Uh-huh. 14:43
 12 Q. And red? 14:43
 13 A. Uh-huh. 14:43
 14 Q. What else? 14:43
 15 A. Correct. 14:43
 16 Yeah. It was swollen and red. 14:43
 17 Q. Was any part of her face more swollen than 14:43
 18 others? 14:43
 19 A. It was around her eye. 14:43
 20 Q. Had bruising developed already? 14:43
 21 A. No. It was red and swollen. 14:43
 22 Q. Okay. So you did not see any bruising on 14:43
 23 Ms. Heard's face the evening of May 21st, 2016, 14:43
 24 correct? 14:43

F/A, SP, Lack
of Pers. Know., Impr. Opin.

25 MS. BROOK: Objection. Vague. 14:43

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41 (Pages 158 - 161)

F/A, SP, Lack of Pers. Know., Impr. Opin.	1	THE WITNESS: I saw a red, swollen, puffy	14:43
	2	face.	14:43
	3	BY MS. VASQUEZ:	14:43
F/A, SP, Lack of Pers. Know., Impr. Opin.	4	Q. And just on the right side, correct?	14:43
	5	A. Correct.	14:43
	6	Q. Okay. Do you recall Ms. Heard taking any	14:44
	7	photographs of the damage in Penthouse 1 -- or	14:44
	8	excuse me, Penthouse 3, where Johnny and Amber	14:44
	9	lived?	14:44
	10	A. I don't recall.	14:44
	11	Q. And correct me if I am wrong, but is it	14:44
	12	your testimony that you did not overhear any	14:44
	13	conversations that the police officers had with	14:44
	14	Ms. Heard, Mr. Drew, or Ms. Pennington, to the	14:44
	15	extent they had any conversations with them; is that	14:44
	16	correct?	14:44
	17	A. Correct. I didn't hear specific words	14:44
	18	spoken.	14:44
	19	Q. Okay.	14:44
	20	MS. VASQUEZ: I'm going to mark as	14:44
	21	Exhibit 4 a deposition transcript of Officer Melissa	14:44
	22	Saenz, S-A-E-N-Z, taken on July 18th, 2016, in	14:45
	23	relation to the Depp V. Depp divorce.	14:45
	24	(Deposition Exhibit 4 was marked for	14:45
	25	identification and is attached hereto.)	14:45
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	1	MS. GOLDSTEIN: Do you have a copy for me?	14:45
	2	MS. VASQUEZ: I'm sorry. These are big.	14:45
	3	Do you mind reading over? I'm sorry.	14:45
	4	MS. BROOK: I do. Hold on one second.	14:45
	5	MS. GOLDSTEIN: Okay. Thank you.	14:45
	6	MS. BROOK: [Attorney hands attorney	14:45
	7	document].	14:45
	8	MS. GOLDSTEIN: Thank you.	14:46
	9	BY MS. VASQUEZ:	14:46
	10	Q. Okay. Directing your attention to	14:46
	11	Page 21, would you, please, read out loud Lines 5	14:46
	12	through 17?	14:46
	13	A. [Reading]:	14:46
	14	"QUESTION: You as part of your	14:46
	15	training in the investigation of a	14:46
	16	potential domestic violence incident,	14:46
	17	I'm assuming you deal with plenty of	14:46
	18	folks who indicate that nothing	14:46
	19	happened when something happened,	14:46
	20	correct?	14:46
	21	"ANSWER: Correct."	14:46
	22	Where do you want me to read through?	14:46
	23	Q. Through 17, please.	14:46
	24	A. [Reading]:	14:46
	25	"QUESTION: And likewise, you deal	14:46
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	1	with folks who indicate that something	14:46
	2	happened when possibly nothing	14:46
	3	happened, correct?	14:46
	4	"ANSWER: Correct.	14:46
	5	"QUESTION: Okay. In this incident,	14:46
	6	I'm assuming whatever Ms. Heard was	14:46
	7	telling you, you were still	14:46
	8	independently investigating any indica,	14:46
	9	any signs that a crime had been	14:47
	10	committed, correct?"	14:47
	11	Q. So I'm going to represent to you that this	14:47
	12	deposition is of the responding police officer	14:47
	13	Melissa Saenz that came to the penthouse with her	14:47
	14	partner Tyler -- Officer Tyler Hadden on the evening	14:47
	15	of May 21st, 2016 in response to whatever calls were	14:47
	16	made that evening.	14:47
	17	MS. BROOK: Before you ask your question,	14:47
	18	I have an objection, Mr. Vasquez. I don't want to	14:47
	19	interrupt.	14:47
	20	MS. VASQUEZ: Go ahead.	14:47
	21	MS. BROOK: And I just want to object for	14:47
	22	the record to the use of this deposition testimony	14:47
	23	from a different matter, and with the witness, who	14:47
	24	as far as I know, has never seen it before and not	14:47
	25	been given the opportunity to review it in its	14:47
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	1	entirety.	14:47
	2	MS. VASQUEZ: That's fine.	14:47
	3	MS. GOLDSTEIN: I would join that	14:47
	4	objection. I -- I've never seen this before,	14:47
	5	Exhibit 4, and I do not think the witness has seen	14:47
	6	it either.	14:47
	7	BY MS. VASQUEZ:	14:47
	8	Q. Ms. Marz, I assume you have not seen this	14:47
	9	deposition transcript before today?	14:47
	10	A. I have not.	14:48
	11	Q. Okay. That's fine.	14:48
	12	Do you have any reason to believe after	14:48
	13	reading the passage that Officer Saenz was not	14:48
	14	investigating whether a crime had been committed on	14:48
	15	May 21st, 2016?	14:48
	16	MS. GOLDSTEIN: Objection. Calls for	14:48
	17	speculation. Lacks foundation. She has no idea	14:48
	18	what this is or --	14:48
	19	MS. VASQUEZ: Okay.	14:48
	20	BY MS. VASQUEZ:	14:48
	21	Q. Do you have any reason to believe that	14:48
	22	when Officer Saenz -- and I will represent to you	14:48
	23	that she was one of the responding police officers	14:48
	24	from the LAPD that responded to the domestic	14:48
	25	violence call that was made by whoever on May 21st,	14:48
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	1 2016, that she was not acting in good faith and 14:48		1 Q. Okay. So your statement that it's your 14:50	F/A, SP, Lack
	2 investigating whether a crime had been committed? 14:48		2 recollection that the police officers didn't spend 14:50	of Pers. Know.
	3 MS. BROOK: Objection. Calls for 14:48		3 quote, "a lot of time investigating," is that a 14:50	
	4 speculation. Lack of foundation. Lack of personal 14:48		4 guess? 14:50	
	5 knowledge. 14:49		5 A. I -- the second group of officers, as I 14:50	
F/A, SP, Lack of Pers. Know.	6 THE WITNESS: I don't remember the police 14:49		6 mentioned before, did not spend a lot of time -- 14:50	
	7 officers spending much time. 14:49		7 when they came, they quickly seemed to have left. 14:50	
	8 BY MS. VASQUEZ: 14:49		8 Q. Okay. And how about the first set of 14:50	
F/A, SP, Lack of Pers. Know.	9 Q. But wasn't it your testimony, Ms. Marz, 14:49		9 police officers? 14:50	
	10 that you were inside Penthouse 1 when the first 14:49		10 A. I don't know how long they were there. 14:50	
	11 police officers came to the scene? 14:49		11 And I don't even -- 14:51	
	12 A. Correct. Correct. 14:49		12 Q. Because you were inside Penthouse -- 14:51	F/A, SP, Lack
	13 Q. Okay. And how much time do you estimate 14:49		13 A. Because I was inside. 14:51	of Pers. Know.
	14 they spent in the penthouses? 14:49		14 Q. -- I? 14:51	
	15 A. I don't remember. The second group of 14:49		15 A. Yeah. Because I didn't see if they 14:51	
	16 officers -- there were two sets of officers that 14:49		16 entered into any of the -- they didn't enter into 14:51	
	17 came. 14:49		17 the unit I was in. 14:51	
	18 Q. Right. 14:49		18 Q. Right. 14:51	
F/A, SP, Lack of Pers. Know.	19 A. The second set of officers that I 14:49		19 A. And I don't know. 14:51	
	20 actually -- was in the apartment, in at PH 3, I 14:49		20 Q. Okay. 14:51	
	21 think it was. 14:49		21 MS. BROOK: And I would just ask that 14:51	
	22 Q. Right. 14:49		22 counsel stop interrupting the witness and allow her 14:51	
F/A, SP, Lack of Pers. Know.	23 A. Four came in and did not come deeply into 14:49		23 to finish her testimony. 14:51	
	24 the apartment. So they didn't walk farther in, they 14:49		24 MS. VASQUEZ: I think she has an attorney 14:51	
	25 stayed very close -- from my recollection -- from my 14:49		25 present that can make the objections if she feels 14:51	
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	1 memory, they stayed very close to the front door and 14:49		1 that is appropriate. 14:51	
	2 did not spend a lot of time. 14:49		2 MS. GOLDSTEIN: I join that objection. 14:51	
	3 Q. Right. 14:49		3 MS. VASQUEZ: Okay. 14:51	
F/A, SP, Lack of Pers. Know.	4 A. I don't know specifically how long, but 14:49		4 BY MS. VASQUEZ: 14:51	
	5 they weren't there investigating, looking around, 14:49		5 Q. All right. Can you, please, turn your 14:51	
	6 spending a lot of time. 14:50		6 attention to Lines 24 on Page 21, where you are at, 14:51	
	7 Q. And that's based on your observations from 14:50		7 and read through, out loud, Line 15 on Page 22, 14:51	
	8 inside Penthouse 3, correct? 14:50		8 please. 14:51	
	9 A. Correct. 14:50		9 A. Uh-huh. [Reading]: 14:51	
	10 Q. And that's in relation to the second 14:50		10 "QUESTION: When you first 14:51	
	11 police officers that came in? 14:50		11 encountered Ms. Heard, you testified 14:51	
	12 A. This in relation to the second -- yes, the 14:50		12 earlier that she was crying, correct? 14:51	
	13 second set of police officers. 14:50		13 "ANSWER: Correct. 14:51	
F/A, SP, Lack of Pers. Know.	14 Q. Okay. And the first set of police 14:50		14 "QUESTION: And -- but that you 14:51	
	15 officers, do you have any way of knowing one way or 14:50		15 looked at her face, correct? 14:51	
	16 the other how much time they spent -- 14:50		16 "ANSWER: Correct. 14:51	
	17 A. I don't know. 14:50		17 "QUESTION: And could you describe? 14:51	
	18 Q. -- at the penthouses? 14:50		18 Did you see any marks of any kind on 14:51	
	19 A. I don't even know if they entered into any 14:50		19 her face at all? 14:51	
	20 of the units, the first set. 14:50		20 "ANSWER: No, I did not. 14:51	
	21 Q. And you have no way of knowing because you 14:50		21 "QUESTION: Did you see any signs of 14:51	
	22 were inside Penthouse 1 where -- 14:50		22 swelling or injury on her face at all? 14:52	
	23 A. Correct. 14:50		23 "ANSWER: No, I did not. 14:52	
	24 Q. -- Josh and Rocky lived, correct? 14:50		24 "QUESTION: Okay. Did you see any 14:52	
	25 A. Correct. 14:50		25 bruises or marks under her" -- "under 14:52	
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1	either eye?	14:52	1	MS. GOLDSTEIN: Misstates testimony.	14:54
2	"ANSWER: No, I did not.	14:52	2	Calls for speculation. Lacks foundation. Lack of	14:54
3	"QUESTION: Did you see any bruises	14:52	3	personal knowledge and argumentative.	14:54
4	or marks of any kind on her cheeks?	14:52	4	MS. BROOK: I'll join all of those	14:54
5	"ANSWER: No, I did not."	14:52	5	objections. And we argue motion to strike all	14:54
6	Q: Thank you, Ms. Marz.	14:52	6	testimony surrounding this deposition transcript,	14:54
7	Do you have any reason to --	14:52	7	which lacks foundation, was not taken in this	14:54
8	MS. BROOK: I just have the same	14:52	8	lawsuit, the witness has never seen it before, has	14:54
9	objection. I move to strike the portion of the	14:52	9	no personal knowledge of the events, has testified	14:54
10	transcript where Ms. Marz is being asked to read	14:52	10	she had minimal to no involvement with the police	14:54
11	from a deposition transcript that she has never seen	14:52	11	officers that arrived. And thus, has no relevance	14:54
12	before and has no personal knowledge of or cannot	14:52	12	to this witness's testimony.	14:54
13	comment on in a material way to this litigation.	14:52	13	THE WITNESS: I don't know. I've never	14:54
14	MS. GOLDSTEIN: Join.	14:52	14	seen this before, and I don't know.	14:54
15	BY MS. VASQUEZ:	14:52	15	BY MS. VASQUEZ:	14:54
16	Q: Do you have reason to disbelieve Officer	14:52	16	Q: Okay. Can you, please, turn to Page 23	14:54
17	Saenz's sworn testimony?	14:52	17	and start reading at Line 20 through Line 17 on	14:54
18	MS. BROOK: Same objection.	14:52	18	Page 24?	14:54
19	BY MS. VASQUEZ:	14:52	19	A: Starting with 20? You said Line 20 on 23?	14:54
20	Q: As you sit here today?	14:52	20	Q: Yes. Please.	14:54
21	A: Do I have any reason to disbelieve? I	14:52	21	A: Okay. [Reading]:	14:54
22	mean, I -- I don't know -- I mean, I don't know. I	14:52	22	"QUESTION: Okay. And when you got	14:54
23	think it's -- I have no idea. I don't know this	14:52	23	inside the apartment, did you have an	14:54
24	person. I don't know, you know, how closely they	14:52	24	opportunity to see the -- the inside of	14:54
25	were paying attention. I don't know what the time	14:53	25	the penthouse?	14:54
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1	period. I don't know if Amber had gone to cover --	14:53	1	"ANSWER: Yes, I did:	14:54
2	like I have no idea what could have happened in that	14:53	2	"QUESTION: Okay. Can you describe	14:55
3	time or why they said no.	14:53	3	for me that there was a sofa located in	14:55
4	Q: Did you say that Amber could have gone to	14:53	4	the penthouse?	14:55
5	cover -- were you saying?	14:53	5	"ANSWER: Yes, there was.	14:55
6	A: I'm saying --	14:53	6	"QUESTION: Okay. Is that where you	14:55
7	Q: To finish your thought?	14:53	7	spoke with Ms. Heard or somewhere else?	14:55
8	A: I am just saying I have no idea. Like, I	14:53	8	"ANSWER: Yes. She was standing in	14:55
9	don't know this person, and I don't know the time	14:53	9	front of a sofa in the entryway.	14:55
10	period that they spent looking at her face to know	14:53	10	"QUESTION: Okay. And as you are	14:55
11	if I believe it or not. I just -- I have never seen	14:53	11	inside the penthouse, did you see any	14:55
12	this before.	14:53	12	broken glass of any kind?	14:55
13	Q: I understand that.	14:53	13	"ANSWER: No, I did not.	14:55
14	At any point on May 21, 2016, did	14:53	14	"QUESTION: Did you see any broken	14:55
15	Ms. Heard leave to go cover up whatever bruising or	14:53	15	picture frames of any kind?	14:55
16	swelling was allegedly on her face?	14:53	16	"ANSWER: No, I did not.	14:55
17	A: Not from my knowledge, no.	14:53	17	"QUESTION: Did you see any wine	14:55
18	Q: Okay. So is it your testimony today that	14:53	18	bottles on the floor or broken in any	14:55
19	this police officer, that I will represent to you is	14:53	19	manner?	14:55
20	a female police officer with the LAPD that's trained	14:53	20	"ANSWER: No, I did not.	14:55
21	in responding to domestic violence calls, is lying;	14:53	21	"QUESTION: Did you see any spilled	14:55
22	is that your testimony?	14:53	22	wine of any kind, spilled liquids of	14:55
23	MS. GOLDSTEIN: Objection.	14:53	23	any kind?	14:55
24	MS. BROOK: Let me -- yeah.	14:53	24	"ANSWER: No, I did not."	14:55
25	Go ahead. I'll follow you, Ms. Goldstein.	14:53	25	MS. BROOK: Same objections.	14:55
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	1 MS. GOLDSTEIN: Same objections. 14:55	1 Q. Okay. And you walked over to Penthouse 3 14:57
	2 BY MS. VASQUEZ: 14:55	2 after the police came, correct? 14:57
	3 Q. At any point on May 21st, 2016, did you 14:55	3 A. After the first set of police came. 14:57
	4 see anybody clean up any of the destruction 14:55	4 Q. Okay. So is it your testimony that you 14:57
	5 allegedly caused by Mr. Depp? 14:55	5 believe or you saw Josh clean up before or after the 14:57
	6 A. I did not. 14:55	6 police came, the first set of police officers? 14:57
	7 Q. Did you clean up anything that Mr. Depp 14:56	7 A. I didn't see him cleaning. But I 14:57
	8 allegedly destroyed? 14:56	8 remember -- from what I remember, I was being told 14:58
	9 A. No. 14:56	9 that -- yeah, that it was cleaned up in that time 14:58
F/A, SP, Lack of Pers. Know.	10 Q. Did you hear about either Ms. Heard, 14:56	10 frame or being cleaned up. 14:58
	11 Mr. Drew, or Ms. Pennington cleaning anything that 14:56	11 Q. Before or after -- 14:58
	12 Mr. Depp allegedly destroyed? 14:56	12 A. I don't remember. 14:58
	13 MS. BROOK: Objection. Calls for hearsay. 14:56	13 Q. -- the first police officers came? 14:58
F/A, SP, Lack of Pers. Know.	14 THE WITNESS: I don't remember, but I'm 14:56	14 A. I don't -- I don't remember. 14:58
	15 pretty -- I do remember that -- I'm pretty sure that 14:56	15 Q. Do you recall who told you that 14:58
	16 Joshua was helping to clean up. 14:56	16 Penthouse 3 had been cleaned up? 14:58
	17 BY MS. VASQUEZ: 14:56	17 A. I don't remember -- no one specifically 14:58
	18 Q. Do you recall -- 14:56	18 told me. It was just -- what I was expressing is 14:58
F/A, SP, Lack of Pers. Know.	19 A. Before I got into -- I remember that -- 14:56	19 that it was cleaned up before I got there, for the 14:58
	20 knowing that the place was cleaned up before I 14:56	20 most part. I just remember that -- for the most -- 14:58
	21 entered in there. 14:56	21 I don't remember. 14:58
	22 Q. Before you entered into where? 14:56	22 MS. VASQUEZ: Can we go off the record 14:59
	23 A. Into the main apartment. Into -- 14:56	23 for, like, two minutes, please. 14:59
	24 Q. The main apartment, meaning Ms. Heard and 14:56	24 THE VIDEOGRAPHER: Going off the record at 14:59
	25 Mr. Depp's apartment? 14:56	25 2:59 p.m. 14:59
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	1 A. Correct. Correct. 14:56	1 (Brief recess.) 15:03
	2 Q. Okay. 14:56	2 (Deposition Exhibit 5 was marked for 15:03
	3 MS. GOLDSTEIN: Ms. Vasquez, could you 14:56	3 identification and is attached hereto.) 15:05
	4 slow down and give the witness a chance to finish 14:56	4 THE VIDEOGRAPHER: Going back on the 15:05
	5 her answer? 14:56	5 record at 3:06. 15:05
	6 MS. VASQUEZ: Absolutely. Thank you. 14:56	6 BY MS. VASQUEZ: 15:05
F/A, SP, Lack of Pers. Know.	7 BY MS. VASQUEZ: 14:56	7 Q. Ms. Marz, can I -- I'm going to mark the 15:05
	8 Q. So you recall Josh Drew cleaning up before 14:56	8 deposition transcript of Amber Laura Heard -- I'm 15:05
	9 you entered Penthouse 3. What was he cleaning up 14:57	9 sorry, Amber Laura Depp taken on August 13th, 2016, 15:06
	10 exactly? 14:57	10 in the Depp v. Depp Divorce case, as Exhibit 5. 15:06
	11 MS. GOLDSTEIN: Objection. Misstates 14:57	11 And can I, please, have you turn to 15:06
	12 testimony. 14:57	12 Page 339 and read from Lines 20 to Line 340 15:06
F/A, SP, Lack of Pers. Know.	13 THE WITNESS: I just remember by the time 14:57	13 [verbatim] on Line 7. 15:06
	14 that I had got -- gotten into that apartment, that 14:57	14 MS. BROOK: And before she reads, let me 15:06
	15 someone had cleaned up the glass and the wine that 14:57	15 just get my objection on the record, if that's all 15:06
	16 had been -- that was on the floor. 14:57	16 right. 15:06
	17 BY MS. VASQUEZ: 14:57	17 I object to the use of this deposition 15:06
	18 Q. And you testified earlier, correct me if I 14:57	18 that is not a deposition of Ms. Marz. It's from 15:06
	19 am wrong, that you walked into that main apartment, 14:57	19 another matter, my understanding of it is; I don't 15:06
	20 Penthouse 3 where Johnny and Amber lived, after 14:57	20 know. And I have never discussed this or anything 15:06
	21 being in Penthouse 1, where Josh and Rocky lived, 14:57	21 else with Ms. Marz of substance. 15:06
	22 correct? 14:57	22 And she's never seen it before and hasn't 15:06
	23 A. Correct. 14:57	23 had a chance to review the entire deposition, which, 15:06
	24 Q. Okay. 14:57	24 from the stack of paper counsel just passed from the 15:06
	25 A. At some point, I walked over. Yeah. 14:57	25 table, I understand to be many hundreds of pages. 15:06
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45 (Pages 174 - 177)

1 MS. GOLDSTEIN: Join in the objection. 15:06	1 A. Yeah. I don't remember seeing it. I 15:09
2 BY MS. VASQUEZ: 15:06	2 don't remember. But, again, as I am reading this -- 15:09
3 Q. Mr. Marz, I assume you have never seen the 15:06	3 when I say the statute, I kind of -- there's 15:09
4 transcript of Ms. Heard that she gave in the divorce 15:06	4 something that is, like, "Oh, maybe. Yeah. I feel 15:09 F/A, SP, Lack
5 proceeding against Mr. Depp, have you? 15:07	5 like I remember there was some -- something that -- 15:09 of Pers. Know.
6 A. No. 15:07	6 some things that were broken." But I don't 15:09
7 Q. If you could, please, read out loud on 15:07	7 specifically remember what they were. 15:09
8 Page 339, start on Line 20 through Line 7 on 340? 15:07	8 Q. And you don't specifically- -- 15:09
9 A. [Verbatim as read]: 15:07	9 A. And I don't specifically remember seeing 15:09
10 "QUESTION: Okay. And were there 15:07	10 it. 15:09
11 any other broken objects scattered on 15:07	11 Q. Okay. Perfect. Thank you. 15:09
12 the floor of Penthouse 5 after you 15:07	12 Now, turning your attention to what we'll 15:09
13 say" -- "after you say he hit you with 15:07	13 mark as Exhibit 6. 15:09
14 the phone? 15:07	14 (Deposition Exhibit 6 was marked for 15:09
15 "ANSWER: Yes. 15:07	15 identification and is attached hereto.) 15:09
16 "QUESTION: What were they? 15:07	16 BY MS. VASQUEZ: 15:09
17 "ANSWER: Some candle things. We 15:07	17 Q. And I will represent to you, Ms. Marz, 15:09
18 have huge, heavy silver candlesticks, 15:07	18 that that is a deposition of Officer Tyler Hadden 15:09
19 Candelabra sticks, those were on the 15:07	19 who came to the Eastern Columbia building on 15:09
20 floor broken. Baskets of our fruit 15:07	20 May 21st, 2016, with Officer Melissa Saenz. 15:10
21 that we had on the kitchen island; 15:07	21 If I could -- 15:10
22 there was fruit everywhere. Baskets on 15:07	22 MS. BROOK: Ms. Goldstein, do you need 15:10
23 the ground with the containers holding 15:07	23 one? 15:10
24 the spoons and forks; kitchen utensils, 15:07	24 MS. GOLDSTEIN: I do. 15:10
25 those were spilled things. Things that 15:07	25 MS. BROOK: Go ahead. Sorry. 15:10
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1 were a lamp, a little statute thing 15:07	1 BY MS. VASQUEZ: 15:10
2 among other things." 15:07	2 Q. And if I could turn your attention to 15:10
3 Q. Okay. And to clarify, Ms. Marz, when you 15:07	3 Page 35, Lines 3 through 20. If you could, please, 15:10
4 came into Penthouse 5 -- I'm sorry. Strike that. 15:08	4 read that out loud? 15:10
5 To clarify, Ms. Marz, when you came into 15:08	5 MS. BROOK: Before she reads, let me just 15:10
6 Penthouse 3 after the police officers, the first set 15:08	6 make my objection for the record. Which is once 15:10
7 of police officers came and left, you did not see 15:08	7 again, this is a deposition from another matter, 15:10
8 silver candlesticks, Candelabra sticks, broken on 15:08	8 that I assume, though, do not know for sure, that 15:10
9 the floor, baskets of fruit that had been on the 15:08	9 the witness has never seen before, has no personal 15:10
10 kitchen island, fruit everywhere, baskets on the 15:08	10 knowledge of, and has not had an opportunity to read 15:10
11 ground, containers holding the spoons and forks, 15:08	11 in full. And, therefore, it is irrelevant to this 15:10
12 kitchen utensils spilled, a lamp and a little statue 15:08	12 examination. 15:10
13 thing broken in Penthouse 5 -- I'm sorry, Penthouse 15:08	13 MS. GOLDSTEIN: I join. 15:10
14 3? 15:08	14 MS. VASQUEZ: Well, the judge will 15:10
15 A. Now that I am reading this, I am sort of 15:08	15 determine what is relevant and not relevant. 15:10
16 remembering that there was, like, some stuff that 15:08	16 MS. BROOK: I agree. I am just making my 15:10
17 had like -- something had been broken, like a 15:08	17 objection. 15:10
18 statute -- like the statue thing kind of sounds 15:08	18 MS. VASQUEZ: That's fine. 15:10
19 familiar to me now, that I am reading this. But, 15:08	19 THE WITNESS: "Did you see" -- so you want 15:10
20 again, I don't remember when I walked in, I think 15:08	20 me to read 3 through what? 15:10
21 there was -- I don't remember this being on the 15:09	21 BY MS. VASQUEZ: 15:10
22 floor. 15:09	22 Q. 20, please. 15:10
23 Q. Okay. 15:09	23 A. 3 through 20. Okay. [Reading]: 15:10
24 A. I don't remember seeing -- 15:09	24 "QUESTION: Did you see any spilled 15:10
25 Q. Okay. So you don't remember seeing it? 15:09	25 wine on the floor? 15:10
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F/A, SP, Lack of
Pers. Know.

1 "ANSWER: No. 15:10
2 "ANSWER: Did you see any other 15:10
3 indica of vandalism or property 15:11
4 destruction when you" -- "When you 15:11
5 observed the living room area of the 15:11
6 penthouse? 15:11
7 "ANSWER: No. 15:11
8 "QUESTION: Did you inspect the 15:11
9 kitchen of the penthouse? 15:11
10 "ANSWER: Yes. 15:11
11 "QUESTION: And did you see any 15:11
12 shattered glass in the kitchen? 15:11
13 "ANSWER: No. 15:11
14 "QUESTION: Did you see any broken 15:11
15 bottles in the kitchen? 15:11
16 "ANSWER: No. 15:11
17 "QUESTION: Did you see any signs of 15:11
18 vandalism or other property destruction 15:11
19 in the kitchen? 15:11
20 "ANSWER: No. 15:11
21 "QUESTION: Did you see any spilled 15:11
22 wine in the kitchen? 15:11
23 "ANSWER: No." 15:11
24 BY MS. VASQUEZ: 15:11
25 Q. After reading Officer Hadden's testimony, 15:11
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1 sworn testimony -- 15:11
2 MS. GOLDSTEIN: Objection. 15:11
3 BY MS. VASQUEZ: 15:11
4 Q. -- Ms. Marz -- 15:11
5 MS. GOLDSTEIN: Sorry. Finish your 15:11
6 question. 15:11
7 MS. VASQUEZ: Yeah. Maybe I should finish 15:11
8 the question. 15:11
9 BY MS. VASQUEZ: 15:11
10 Q. After reading Officer Hadden's sworn 15:11
11 testimony and after reading Ms. Heard's sworn 15:11
12 testimony, both from 2016, would you agree with me 15:11
13 that both Officer Hadden and Ms. Heard can't be both 15:11
14 telling the truth? 15:11
15 MS. GOLDSTEIN: Objection. Assumes facts 15:11
16 not in evidence. Calls for speculation. Lacks 15:12
17 foundation. Lack of personal knowledge. 15:12
18 MS. BROOK: I would add the same. 15:12
19 objections or join. 15:12
20 THE WITNESS: I can see how they both 15:12
21 could be true. 15:12
22 BY MS. VASQUEZ: 15:12
23 Q. How? 15:12
24 A. Because -- are you -- are you saying these 15:12
25 are the second round of officers that came? 15:12
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1 Q. I'm not saying anything. 15:12
2 A. So there was two different sets of 15:12
3 officers. And as I mentioned, it had seemed that 15:12
4 things were cleaned up by the time I got in there, 15:12
5 which means that by the time that the officers came 15:12
6 things would have been cleaned up. So it would be 15:12
7 true that they didn't see what I didn't see is the 15:12
8 same as what they didn't see. So my -- yeah, I 15:12
9 think they can both be true. 15:12
10 Q. Did Amber direct Mr. Drew to clean up the 15:12
11 carnage that Mr. Depp allegedly had caused the 15:12
12 vandalism in Penthouse 3? 15:12
13 A. I don't know. 15:12
14 Q. Before the police officers came? 15:12
15 A. I don't know. I didn't see -- I didn't 15:12
16 see that. 15:13
17 Q. Does that make sense to you that a 15:13
18 domestic violence victim whose husband had just 15:13
19 thrown a phone at close range at her face and caused 15:13
20 all this havoc in the home that they shared, would 15:13
21 instruct her friend to clean up the vandalism before 15:13
22 the police officers responding to a domestic 15:13
23 violence call came to the apartment? 15:13
24 Does that make sense to you? 15:13
25 MS. BROOK: Ms. Marz, let me get an 15:13
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1 objection in here. 15:13
2 Objection. Lack of personal knowledge. 15:13
3 Lack of foundation. Calls for speculation and 15:13
4 argumentative. 15:13
5 MS. GOLDSTEIN: Join. 15:13
6 THE WITNESS: As I mentioned before, I 15:13
7 think Amber was maybe not ready to report her 15:13
8 husband even though the police were called by a 15:13
9 friend from -- from what I heard, the police were 15:13
10 called by i.O., because she heard screaming and 15:13
11 yelling and fighting happening. I don't know if 15:13
12 Amber would have called the police. 15:13
13 So from my perspective, yes, it feels like 15:13
14 she would clean it up because she wasn't -- I don't 15:13
15 know, maybe she was still trying to protect his 15:14
16 name. Like, I don't -- I don't think she wanted the 15:14
17 police to investigate, or look at the face, or see 15:14
18 the destruction because that would mean, again, that 15:14
19 she was reporting it. And I don't know if she was 15:14
20 ready to do that. 15:14
21 BY MS. VASQUEZ: 15:14
22 Q. Right. 15:14
23 But yet there were photographs taken of 15:14
24 the scene, correct? 15:14
25 A. I don't know. 15:14
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1 Q. I will represent to you that photographs 15:14
2 were taken on May 21st, 2016 of this crime scene. 15:14
3 Does that surprise you that there were 15:14
4 photographs taken but then the scene was cleaned up? 15:14
5 A. I don't know the timeline. 15:14
6 Q. Okay. 15:14
7 MS. BROOK: And just to go back, 15:14
8 objection. Assumes facts. Lacks foundation. 15:14
9 BY MS. VASQUEZ: 15:14
10 Q. Okay. Does it make sense that somebody 15:14
11 would take pictures of a crime scene and then clean 15:14
12 it before from the police came? Does that make 15:14
13 sense to you? 15:14
14 MS. BROOK: Objection. Incomplete 15:14
15 hypothetical. 15:14
16 MS. GOLDSTEIN: Calls for speculation. 15:14
17 THE WITNESS: I don't know. 15:14
18 BY MS. VASQUEZ: 15:15
19 Q. Okay. So after the second round of police 15:15
20 officers came, did you stay in one of the penthouses 15:15
21 that evening on May 21st, 2016? 15:15
22 A. Did I sleep over? 15:15
23 Q. Uh-huh? 15:15
24 A. Yes. 15:15
25 Q. Okay. Where did you sleep? 15:15

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1 A. I would have slept in Raquel and Josh's -- 15:15
2 unless I went home. I don't remember actually to be 15:15
3 honest if I slept over that night or if I went home. 15:15
4 I don't remember. 15:15
5 Q. When was the next time you saw Ms. Heard 15:15
6 after May 21, 2016? 15:15
7 A. The following day. 15:15
8 Q. So you saw her on May 22nd, 2016? 15:15
9 A. Yes. 15:15
10 Q. Okay. Did she appear to have bruises on 15:15
11 her face, swelling? 15:15
12 A. I didn't speak to her. 15:15
13 Q. You saw her though? 15:15
14 A. Yeah. So she came by the bead show. And 15:58
15 so we set up a booth, and I was actually there
16 reading taro cards, and I was having my own
17 experience.
18 So I -- I did see her come by, but I
19 didn't actually speak to her when she came. So we
20 were not face-to-face. 15:58
21 Q. Did you have a chance to look at her face, 15:58
22 though, on May 22nd, 2016? 15:58
23 A. No. We didn't speak. I mean, I saw her; 15:58
24 she was there; but I didn't -- for a little bit, but 15:58
25 I didn't speak to her. 15:58

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F/A, SP, Lack of
Pers. Know.

1 Q. You didn't look at her face either; is 15:58 F/A, SP, Lack
2 that your testimony? 15:58 of Pers. Know.
3 A. I don't remember looking at her face. 15:58
4 Q. Was she wearing sunglasses, if you 15:58
5 remember? 15:58
6 A. I don't remember. 15:58
7 Q. Did she have her hair up or down? Do you 15:58
8 remember? 15:58
9 A. I don't remember. 15:58
10 Q. Would you remember if Ms. Heard had any 15:58 F/A, SP, Lack
11 marks on her face on May 22nd, 2016? 15:58 of Pers. Know.
12 MS. GOLDSTEIN: Objection. Calls for 15:58
13 speculation. 15:58
14 THE WITNESS: Again, I don't remember. I 15:58 F/A, SP, Lack
15 was very focused on what I was doing. I was helping 15:58 of Pers. Know.
16 Raquel, and there was people coming in and out, so I 15:58
17 didn't speak to her. And I don't remember what her 15:58
18 face looked like the next day. 15:58
19 BY MS. VASQUEZ: 15:58
20 Q. And just to be clear, your testimony is 15:58
21 that Ms. Heard was beat the night before by her 15:58
22 husband, Johnny Depp, and you don't remember the 15:58
23 next day seeing her and looking at her face and 15:58
24 seeing if she had any marks on her face on May 22nd, 15:58
25 2016, after this traumatic event that you all went 15:58

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1 through? 15:58
2 MS. GOLDSTEIN: Objection. Misstates 15:58
3 prior testimony. And argumentative. 15:58
4 MS. BROOK: Join. 15:58
5 THE WITNESS: Yeah, I never said -- I 15:58
6 didn't say -- what you just insinuated was not words 15:58
7 from my mouth. 15:58
8 BY MS. VASQUEZ: 15:58
9 Q. I didn't say you said anything. 15:58
10 A. I had heard that he threw a phone at her. 15:58 H, F/A, SP, Lack
11 And what I saw was an aftermath where her face was 15:58 of Pers.
12 swollen and red so -- 15:58 Know.
13 Q. Right. 15:58
14 And so after this incident on May 21st, 15:58 H, F/A, SP, Lack
15 2016, where Johnny Depp threw a phone at his wife 15:58 of Pers.
16 to -- at close range, her face was swollen and red, 15:58 Know.
17 you see her the next day, and you don't remember 15:58
18 whether her face had any marks on it? 15:58
19 A. Again, I didn't talk to her. She was -- 15:58
20 Q. I understand that. 15:58
21 A. She was -- I could have just seen her 15:58 H, F/A, SP, Lack
22 back. I didn't interact with her the next day, so I 15:58 of Pers.
23 didn't look at her face. 15:58 Know.
24 Q. Okay. 15:58
25 A. I was head -- I was doing my own thing. 15:58

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1	Q. So you don't know one way or the other	15:58	1	MS. BROOK: I'm sorry. What is the	15:58
2	whether Ms. Heard actually had any marks on her face	15:58	2	question? I'm confused.	15:58
3	on March 22nd, 2016; is that right?	15:58	3	MS. VASQUEZ: I'm asking what version of	15:58
4	A. Right. I didn't speak with her that day.	15:58	4	the declaration she is reviewing currently she has	15:58
5	Q. I'm going to show you and mark on the	15:58	5	in front of her.	15:58
6	record what you produced to me this morning, which	15:58	6	MS. BROOK: Got it. Thank you.	15:58
7	is e-mails and a declaration. What's been Bates	15:58	7	THE WITNESS: [Witness reviews document	15:58
8	labeled Depp vs. Heard EM 003 through 008.	15:58	8	cont'd].	15:58
9	A. I have my own copy of this.	15:58	9	I think this is -- yeah, I think this is	15:58
10	MS. VASQUEZ: Can we go off the record,	15:58	10	the first.	15:58
11	please, I'm trying to save some time.	15:58	11	BY MS. VASQUEZ:	15:58
12	THE VIDEOGRAPHER: We're going off the	15:58	12	Q. Did you draft this declaration, Ms. Marz?	15:58
13	record at 3:20 p.m.	15:58	13	A. No.	15:58
14	(Brief recess.)	15:58	14	Q. Who did?	15:58
15	THE VIDEOGRAPHER: Going back on the	15:58	15	A. I don't know.	15:58
16	record at 3:22 p.m.	15:58	16	MS. GOLDSTEIN: Objection. Calls for	15:58
17	(Deposition Exhibit 7 was marked for	15:58	17	speculation.	15:58
18	identification and is attached hereto.)	15:58	18	BY MS. VASQUEZ:	15:58
19	BY MS. VASQUEZ:	15:58	19	Q. You don't know who drafted the	15:58
20	Q. Ms. Marz, I'm going to show you what has	15:58	20	declaration?	15:58
21	been marked Exhibit Number 7, which you -- your	15:58	21	A. I don't know who drafted it. I know that	15:58
22	attorney produced to us today in response to our	15:58	22	it was sent by Rick Schwartz -- or, Rich Schwartz.	15:58
23	subpoena.	15:58	23	Q. And it was sent by Mr. Schwartz after you	15:58
24	This appears to be an e-mail between you	15:58	24	met with him on or about July 10th, 2019, correct?	15:58
25	and Richard Schwartz, dated July 11th, 2019.	15:58	25	A. Correct.	15:58
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1	Do you recall receiving this e-mail from	15:58	1	Q. So is it safe to assume Mr. Schwartz or	15:58
2	Mr. Schwartz?	15:58	2	somebody at his office drafted this declaration	15:58
3	A. Sorry.	15:58	3	after you met with them some time in July of 2019?	15:58
4	Yes. Yes. Yes.	15:58	4	MS. GOLDSTEIN: Objection. Calls for	15:58
5	Q. Do you recall reviewing the declaration	15:58	5	speculation.	15:58
6	that was attached to this e-mail starting on Bates	15:58	6	THE WITNESS: It's -- yeah. It's safe to	15:58
7	label -005 through -007?	15:58	7	assume that it was drafted after I met with him.	15:58
8	A. Oh, -005 through -007 -- I don't know	15:58	8	BY MS. VASQUEZ:	15:58
9	what -- oh.	15:58	9	Q. Because you didn't draft the declaration	15:58
10	Yes. I recall reviewing it on two	15:58	10	yourself, correct?	15:58
11	different occasions and making edits.	15:58	11	A. [Witness nods head up and down].	15:58
12	Q. Okay. Do you know, sitting here today, as	15:58	12	Q. Is that right?	15:58
13	you review that declaration, whether this is the	15:58	13	A. Correct.	15:58
14	final version of the declaration or were there	15:58	14	Q. Okay. Let's go to Bates labeled -005,	15:58
15	subsequent edits?	15:58	15	first page of your declaration, Paragraph 6.	15:58
16	A. It was never signed.	15:58	16	A. During --	15:58
17	Q. I understand that.	15:58	17	Q. Would you mind reading that out loud for	15:58
18	A. So there's not a final version of	15:58	18	me please.	15:58
19	anything.	15:58	19	A. [Reading]:	15:58
20	But let me check. [Witness reviews	15:58	20	"During that time period in early	15:58
21	document].	15:58	21	2016, Rocky told me that Johnny had	15:58
22	Are you asking if this was the first one	15:58	22	been volatile, especially towards	15:58
23	or the second?	15:58	23	Amber. Rocky told me that Johnny had	15:58
24	Q. Yes.	15:58	24	shoved or pushed Amber on a private	15:58
25	A. [Witness reviews document].	15:58	25	flight, and that there was strife	15:58
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1	between Johnny and Amber. Rocky also	15:58	1	BY MS. VASQUEZ:	15:58
2	told me that Amber was still in love	15:58	2	Q. Okay. Ms. Marz, could I have you turn the	15:58
3	with Johnny, so it was not surprising	15:58	3	what was previously marked as your -- your	15:58
4	to me that Amber did not tell me these	15:58	4	deposition in the divorce matter is that --	15:58
5	details herself."	15:58	5	A. My deposition?	15:58
6	Q. Do you recall telling Mr. Schwartz that	15:58	6	Q. Is it marked 2 --	15:58
7	early in 2016 Rocky had told you that Johnny had	15:58	7	A. 3.	15:58
8	been, quote, "volatile, especially towards Amber,"	15:58	8	Q. That's been previously marked as	15:58
9	and "had shoved or pushed Amber on a private	15:58	9	Exhibit 3.	15:58
10	flight"?	15:58	10	Do you mind turning to Page 36, Lines 12	15:58
11	A. I remember hearing about the flight	15:58	11	through 23.	15:58
12	situation that they -- that he -- that he shoved her	15:58	12	A. [Reading]:	15:58
13	on a flight. But I don't -- I don't remember if I	15:58	13	"QUESTION: Has Raquel ever told you	15:58
14	heard about it before May 21st or after. I don't	15:58	14	that in a conversation, that Johnny is	15:58
15	remember.	15:58	15	abusive toward Amber?"	15:58
16	And when I was giving this deposition	15:58	16	MS. BROOK: Ms. Marz, I'm sorry to	15:58
17	[verbatim], I was very much -- it felt very casual	15:58	17	interrupt. The court reporter has to get this	15:58
18	and, like, story -- I wasn't being asked, like,	15:58	18	verbatim. If you could slow down a bit and read	15:58
19	super specific questions, and so it was more	15:58	19	slower, that would be appreciated.	15:58
20	speaking as I would normally speak and just pulling	15:58	20	THE WITNESS: Yes.	15:58
21	from what I remember. But then maybe there was	15:58	21	12 through what?	15:58
22	some -- I didn't go through it.	15:58	22	BY MS. VASQUEZ:	15:58
23	When he -- yeah, it gave me the	15:58	23	Q. 23.	15:58
24	opportunity to really go through it. But, yes, I do	15:58	24	A. [Reading]:	15:58
25	remember giving some of this information during	15:58	25	"QUESTION: Has Raquel ever told you	15:58
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1	that -- that time when I met with Richard.	15:58	1	that in a conversation, that Johnny is	15:58
2	Q. Yeah, I'm specifically focused on the	15:58	2	abusive towards Amber?	15:58
3	first part of the paragraph that reads [reading]:	15:58	3	"ATTORNEY: Same objection.	15:58
4	"During that time period in early	15:58	4	Hearsay.	15:58
5	2016, Rocky told me that Johnny had	15:58	5	"ATTORNEY: Same.	15:58
6	been volatile."	15:58	6	"QUESTION: You can answer.	15:58
7	Today you testified that you don't	15:58	7	"ANSWER: Not -- not before -- it	15:58
8	remember, but you don't believe that Rocky or	15:58	8	was never discussed before that night,	15:58
9	anybody had ever told you that Mr. Depp had been	15:58	9	no.	15:58
10	violent towards Ms. Heard before May 21st, 2016.	15:58	10	"QUESTION: So the first instance	15:58
11	A. I don't remember -- yeah, so I think	15:58	11	you're aware of that Johnny was violent	15:58
12	the -- what I am trying to express is I don't	15:58	12	towards Amber is on the night of	15:58
13	remember if I was told before May 21st or after	15:58	13	May 21st?	15:58
14	May 21st. But I remember being told about these two	15:58	14	"ANSWER: Yes."	15:58
15	instances, but I don't remember if it was before the	15:58	15	Q. Okay. So your testimony that you gave in	15:58
16	May 21st situation or if it was after.	15:58	16	July of 2016 is different than the testimony that's	15:58
17	Because after, there was all this press,	15:58	17	in your declaration that was drafted this year in	15:58
18	and, like, media, and also more stories kind of came	15:58	18	2019, correct?	15:58
19	out after, so I don't -- I actually don't remember.	15:58	19	MS. BROOK: Objection. Mischaracterizes	15:58
20	Q. Do you recall telling Mr. Schwartz	15:58	20	the document. It's an unsigned declaration. It's	15:58
21	specifically that it was in early 2016 that Rocky	15:58	21	improper to call it testimony.	15:58
22	had told you?	15:58	22	MS. GOLDSTEIN: Join.	15:58
23	A. I don't remember saying specifically.	15:58	23	THE WITNESS: Correct. I actually edited	15:58
24	MS. BROOK: And I would just add	15:58	24	this testimony, again, a second time, so I don't	15:58
25	objection; it assumes facts not in evidence.	15:58	25	know if you have that.	15:58
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1	Also, yeah, I'm seeing -- I'm really doing	15:58
2	the best I can to tell the truth and nothing but the	15:58
3	truth, and I -- specific facts, I don't remember.	15:58
4	So I remember being told about a plane	15:58
5	situation and some fights, but I don't remember when	15:58
6	I was told.	15:58
7	So here I see that I wrote that. I see	15:58
8	that I said yes, that I -- it was not before that	15:58
9	night.	15:58
10	But I am doing the best I can to remember,	15:58
11	and I don't remember.	15:58
12	BY MS. VASQUEZ:	15:58
13	Q. And were you doing the best you can when	15:58
14	you spoke to Ms. Heard's attorney, Richard Schwartz,	15:58
15	on July 10th, 2019?	15:58
16	A. Yeah. I was doing the best I can to	15:58
17	recall.	15:58
18	Q. And were you being honest with him?	15:58
19	A. I always have been honest as I could be in	15:58
20	every moment.	15:58
21	Q. So is it your testimony that Mr. Schwartz	15:58
22	or somebody at his office was dishonest when they	15:58
23	drafted this declaration, this draft of the	15:58
24	declaration?	15:58
25	MS. GOLDSTEIN: Objection. Misstates	15:58
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1	testimony.	15:58
2	MS. BROOK: Objection. Yes, and	15:58
3	argumentative. And join in Ms. Goldstein's	15:58
4	objections.	15:58
5	THE WITNESS: It's not -- reading this,	15:58
6	it's not my -- it's not my -- I don't think that	15:58
7	words were put into my mouth, but I think that	15:58
8	perhaps when I was -- you know, when I met with the	15:58
9	lawyer, and we were speaking about it, and it was	15:58
10	much more conversational than it was like I am on	15:58
11	the record, and I am answering "yes" or "no"	15:58
12	questions. And it was, like, telling a story,	15:58
13	right?	15:58
14	So as anybody who is telling a story about	15:58
15	events that happened four-plus years ago, I'm doing	15:58
16	the best that I can to be as clear, right?	15:58
17	Having not read this deposition [verbatim]	15:58
18	until it was -- until very recently, having not	15:58
19	signed that deposition [verbatim], I did the best	15:58
20	that I could to recount the events from	15:58
21	four-something-years ago.	15:58
22	So, again, doing the best I can to	15:58
23	remember, and it doesn't, to me, feel like anything	15:58
24	was taken out of context. It's just that when I was	15:58
25	given the opportunity to really look through it and	15:58
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1	take it line-by-line and what I actually remember,	15:58
2	because I am about to sign my name next to something	15:58
3	that is in the media or public, I want to make sure	15:58
4	I remember exactly what I --	15:58
5	BY MS. VASQUEZ:	15:58
6	Q. You were about to sign something that was	15:58
7	signing under the penalty of perjury, and you	15:58
8	understood that this declaration that was being	15:58
9	prepared for you was equivalent of a deposition?	15:58
10	Was that explained to you?	15:58
11	A. No, not really.	15:58
12	Q. "No"?	15:58
13	A. I mean, I -- it wasn't even called a	15:58
14	"deposition." It was --	15:58
15	Q. A declaration?	15:58
16	A. A declaration, exactly. It was a	15:58
17	declaration. I'm not in law, so it's not something	15:58
18	that I am --	15:58
19	Q. Did you read the last sentence of the --	15:58
20	MS. BROOK: Objection. And can you let	15:58
21	the witness finish her testimony?	15:58
22	BY MS. VASQUEZ:	15:58
23	Q. -- draft declaration?	15:58
24	A. Again, busy life over here [witness	15:58
25	indicates]. Lots going on. Not necessarily	15:58
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1	thumbing through these types of things. This is	15:58
2	definitely not my first priority.	15:58
3	So, again, I -- I didn't go to law school.	15:58
4	I don't -- I'm not -- I'm doing the best I can.	15:58
5	Q. Did you -- Okay. And I appreciate that.	15:58
6	A. Yeah.	15:58
7	Q. Do you read documents before you sign	15:58
8	them?	15:58
9	A. Of course. Of course. Which is why I	15:58
10	didn't sign it yet because, again, I didn't have	15:58
11	the -- didn't have the time to actually, like, look	15:58
12	through it.	15:58
13	And the time period that I was -- yeah,	15:58
14	when I realized I was signing something that could	15:58
15	potentially be -- put my name next to something that	15:58
16	would be out in the world, it is why I waited to	15:58
17	sign.	15:58
18	Q. It's why you never signed it, correct?	15:58
19	A. Right. Well, I sent -- there were -- so I	15:58
20	sent one correction and then I sent another	15:58
21	correction. And after the second round of	15:58
22	corrections, it was never corrected, so there was	15:58
23	nothing to sign.	15:58
24	Q. Okay. On Paragraph 7, can you read that	15:58
25	out loud, please.	15:58
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1	A. Paragraph 7? Yes.	15:58	1	sentence and indicates that it needs to be edited.	15:58
2	[Reading]:	15:58	2	MS. VASQUEZ: Okay. That's fine.	15:58
3	"On May 21, 2016, I witnessed	15:58	3	BY MS. VASQUEZ:	15:58
4	firsthand what Amber had been going	15:58	4	Q. Why don't we use the later declaration?	15:58
5	through. I had come over to the	15:58	5	A. Okay.	15:58
6	Eastern Columbia Building to help Rocky	15:58	6	Q. So why don't we mark as Exhibit Number 8	15:58
7	with her first jewelry show. Rocky	15:58	7	what counsel for the deponent has produced to me,	15:58
8	designs and creates bead jewelry, and	15:58	8	which is Bates labeled Depp v. Heard EM 027 through	15:58
9	she asked for my assistance in setting	15:58	9	036.	15:58
10	up the various pieces for the sale the	15:58	10	(Deposition Exhibit 8 was marked for	15:58
11	following day."	15:58	11	identification and is attached hereto.)	15:58
12	Q. Is it your testimony, though, Ms. Marz,	15:58	12	MS. GOLDSTEIN: Do you have a copy of	15:58
13	that you never witnessed firsthand Mr. Depp strike	15:58	13	that?	15:58
14	Ms. Heard; is that correct?	15:58	14	MS. BROOK: Sorry. I didn't catch the	15:58
15	A. That is correct.	15:58	15	exhibit number. Where are we?	15:58
16	Q. And you never witnessed firsthand Mr. Depp	15:58	16	MS. VASQUEZ: 27 through -- I actually	15:58
17	throw something at Ms. Heard, correct?	15:58	17	just gave...	15:58
18	A. Correct.	15:58	18	MS. BROOK: And it's marked 8, correct?	15:58
19	Q. So when your declaration reads [reading]:	15:58	19	MS. VASQUEZ: Yes.	15:58
20	"On May 21, 2016, I witnessed	15:58	20	Can we go off the record for a quick	15:58
21	firsthand what Amber had been going	15:58	21	second, please.	15:58
22	through"...	15:58	22	THE VIDEOGRAPHER: Going off the record at	15:58
23	...what specifically firsthand were you	15:58	23	3:36 p.m.	15:58
24	referring to?	15:58	24	(Brief recess.)	15:58
25	MS. GOLDSTEIN: Objection. The witness	15:58	25	THE VIDEOGRAPHER: Going back on the	15:58
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1	has testified that she did not draft this	15:58	1	record at 3:38 p.m.	15:58
2	declaration.	15:58	2	MS. VASQUEZ: I just informed counsel for	15:58
3	MS. VASQUEZ: But she contributed to it.	15:58	3	Ms. Heard that despite my partner's agreement to	15:58
4	She met with the attorneys, and they sent her this	15:58	4	split third-party depositions evenly between both	15:58
5	declaration, specifically saying, "After meeting	15:58	5	counsels, I may go a little bit after my three and a	15:58
6	with us, here is a summary, a draft declaration for	15:58	6	half hours allotted to me. And I believe Ms. Brook	15:58
7	you to review."	15:58	7	has an objection she would like to say on the	15:58
8	THE WITNESS: Okay. So...	15:58	8	record.	15:58
9	MS. BROOK: What is the question?	15:58	9	MS. BROOK: Yeah, we'll reserve the right	15:58
10	MS. VASQUEZ: Do you do mind reading back	15:58	10	to quibble about this off the record so that it	15:58
11	the question, please.	15:58	11	doesn't implicate the witness who has already made	15:58
12	(The following record was read:	15:58	12	herself available today, but we can talk about it	15:58
13	"QUESTION: So when your declaration	15:58	13	later down the road.	15:58
14	reads [reading]:	15:58	14	MS. VASQUEZ: Great.	15:58
15	"On May 21, 2016, I witnessed	15:58	15	MS. GOLDSTEIN: And I'll just object	15:58
16	firsthand what Amber had been going	15:58	16	briefly to the record to any procedures that result	15:58
17	through"...	15:58	17	in the witness being delayed or called back on a	15:58
18	"...what specifically firsthand were	15:58	18	separate day.	15:58
19	you referring to?")	15:58	19	MS. VASQUEZ: That's fine.	15:58
20	MS. GOLDSTEIN: Same objection.	15:58	20	BY MS. VASQUEZ:	15:58
21	MS. BROOK: Yeah, and I also object to you	15:58	21	Q. So turning your attention, Ms. Marz, to	15:58
22	asking this with the earlier version of the	15:58	22	what has now been marked to Exhibit 7 --	15:58
23	declaration that Ms. Marz produced this morning.	15:58	23	MS. GOLDSTEIN: Ms. Vasquez, Exhibit 8.	15:58
24	She has produced a later version of this	15:58	24	MS. VASQUEZ: Thank you.	15:58
25	declaration where she specifically highlights this	15:58	25	///	
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1 BY MS. VASQUEZ:	15:58	1 there was an awareness that the phone -- like she	15:58
2 Q. -- Exhibit 8, on Paragraph 7, you have	15:58	2 might need support.	15:58
3 highlighted the sentence that says, "On May 21st,	15:58	3 Q. But when you were reading this version of	15:58
4 2016," and you highlighted this portion [reading]:	15:58	4 the declaration to yourself, that didn't ring true	15:58
5 "I witnessed firsthand what Amber	15:58	5 to you and so you asked Mr. Schwartz to delete that;	15:58
6 had been going through [period]."	15:58	6 is that true?	15:58
7 When you highlighted that, did you	15:58	7 A. As I was reading it, I was very aware in	15:58
8 indicate to Mr. Schwartz or somebody at his office	15:58	8 that moment that I should be very clear about what I	15:58
9 that that part of the sentence needed to be deleted?	15:58	9 remember and what I don't remember because I was	15:58
10 A. Yes. I --	15:58	10 signing this. And so -- yes, so I went -- I took	15:58
11 Q. And -- I'm sorry.	15:58	11 out anything that I didn't know exact specifics of.	15:58
12 A. Yes.	15:58	12 Q. Okay. Paragraph 11, specifically	15:58
13 Q. Okay. Is there a reason that you wanted	15:58	13 highlighted --	15:58
14 that part of the sentence deleted?	15:58	14 Well, do you mind reading out loud	15:58
15 A. Because I did not witness firsthand.	15:58	15 Paragraph 11?	15:58
16 Q. You did not witness firsthand what?	15:58	16 A. [Reading]:	15:58
17 A. Firsthand anything. I didn't -- I didn't	15:58	17 "Josh and I stayed in the apartment	15:58
18 witness firsthand Johnny abusing Amber.	15:58	18 we were in, and soon heard the sounds	15:58
19 Q. Okay. Turning your attention to	15:58	19 of screaming, yelling, doors slamming,	15:58
20 Paragraph 8, the last sentence of Paragraph 8, which	15:58	20 and other disturbing noises. Josh	15:58
21 begins on Page 2 of your declaration.	15:58	21 appeared to be getting nervous, pacing	15:58
22 A. Last sentence in paragraph -- okay. What	15:58	22 by the door. Josh appeared to be	15:58
23 I highlighted?	15:58	23 physically preparing himself for some	15:58
24 Q. Yes.	15:58	24 confrontation."	15:58
25 Can you repeat that out loud?	15:58	25 Q. Do you recall telling Ms. Heard's	15:58
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1 A. [Reading]:	15:58	1 attorneys that you heard disturbing noises?	15:58
2 "At that point, Amber told Rocky to	15:58	2 A. Again, I specifically don't remember	15:58
3 have her phone handy 'in case something	15:58	3 everything I said when I was describing what was	15:58
4 gets out of hand."	15:58	4 going on.	15:58
5 Q. Why did you request that Mr. Schwartz or	15:58	5 But I -- the reason why I deleted that is	15:58
6 somebody at his office delete that sentence from	15:58	6 because that "disturbing noises" is questionable,	15:58
7 your declaration?	15:58	7 like what does that sound like?	15:58
8 MS. BROOK: Objection. Assumes facts.	15:58	8 So I felt like "screaming, yelling, and	15:58
9 THE WITNESS: Because I, essentially, went	15:58	9 door slamming" was sufficient enough to describe	15:58
10 through this entire thing and took out anything that	15:58	10 what I was feeling or what I heard.	15:58
11 I didn't specifically remember.	15:58	11 So that felt vague to me so I wanted to	15:58
12 So as I mentioned before, I remember there	15:58	12 delete it.	15:58
13 being conversation around it, but I don't remember	15:58	13 (Cell phone interruption.)	15:58
14 if it was -- I don't remember someone saying "in	15:58	14 MS. BROOK: Your 3:15 is up [attorney	15:58
15 case something gets out of hand," I don't remember	15:58	15 indicates cell phone]. I'll turn it off. Sorry.	15:58
16 this.	15:58	16 BY MS. VASQUEZ:	15:58
17 BY MS. VASQUEZ:	15:58	17 Q. And the other sentence that you had --	15:58
18 Q. Do you remember telling Mr. Schwartz when	15:58	18 that you requested Mr. Schwartz to delete was	15:58
19 you met with him that at one point Amber had told	15:58	19 [reading]:	15:58
20 Rocky to have her phone handy in case, quote,	15:58	20 "Josh appeared to be physically	15:58
21 "something gets out of hand"?	15:58	21 preparing himself for some	15:58
22 A. I believe that I could have said something	15:58	22 confrontation."	15:58
23 to that nature. I don't specifically remember.	15:58	23 Why did you have that deleted?	15:58
24 Again, it was very conversational, so I	15:58	24 A. I think I was just trying to be as concise	15:58
25 don't remember specifically how I described that	15:58	25 as possible.	15:58
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1	I mean [reading]:	15:58	1	approaching me [...] I reacted by	16:46	
2	"Josh appeared to be getting nervous	15:58	2	running past him as soon as he got	16:46	
3	and pacing by the door"...	15:58	3	close to me."	16:46	
4	...felt like sufficient enough for me	15:58	4	Yeah, he got close to me. I don't know if	16:46	
5	to -- to get across what I was -- what I was	15:58	5	specifically Johnny was charging me --	16:46	
6	experiencing was his alertness, you know, so...	15:58	6	Q. Was that your testimony -- I'm sorry. Go	16:47	
7	Q. Is it because Josh did not appear to you	15:58	7	ahead.	16:47	
8	to be physically preparing himself for some	15:58	8	A. -- but I know that it felt like he was	16:47	
9	confrontation?	15:58	9	running quickly towards me, and it felt like -- and	16:47	
10	A. I don't really know, like, what that -- I	15:58	10	it was his energy, the way he was running in the	16:47	
11	very well could have said that in the moment when I	15:58	11	room, the way he busted open the door was scary to	16:47	
12	was speaking to Rick Schwartz. But I don't really	15:58	12	me, and I ran out.	16:47	
13	know what that necessarily -- there are so many	15:58	13	So, again, I don't know if it was his	16:47	
14	things that could mean.	15:58	14	intention to hurt me; I can't say that. I can't say	16:47	
15	Q. If you don't know what that means, you	15:58	15	that he was charging at me, but it felt like he was,	16:47	
16	really think you would have described Josh that way	15:58	16	and so I reacted by running past him.	16:47	
17	to Rick Schwartz?	15:58	17	Q. It felt like he was charging at you and	16:47	
18	MS. BROOK: Objection. Argumentative.	15:58	18	yet you have --	16:47	
19	THE WITNESS: I know what it means, right?	15:58	19	A. He was running in towards me.	16:47	
20	I think there's a lot of -- I took it out because I	15:58	20	Q. Let me finish my question, please.	16:47	
21	think -- and I very well could have said it, but I	15:58	21	A. Sure.	16:47	
22	think I took it out because there's a lot of room	15:58	22	Q. You felt like he was charging at you, and	16:47	
23	for interpretation around what someone could look	15:58	23	you testified earlier today that Johnny charged at	16:47	
24	like when they are physically preparing themselves	15:58	24	you and that you felt scared.	16:47	
25	for confrontation.	15:58	25	That was your testimony earlier today,	16:47	
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1	I mean, again, as I experienced Josh, he	15:58	1	correct?	16:47	
2	got up, he stood by the door, and we started to hear	16:46	2	MS. GOLDSTEIN: Objection. Misstates	16:47	
3	noise. It all happened very fast. He was looking	16:46	3	prior testimony.	16:47	
4	out the peephole, and then boom, the door exploded,	16:46	4	MS. VASQUEZ: Well, the record will	16:47	
5	right?	16:46	5	reflect it.	16:47	
6	So he was up, at the front of the door.	16:46	6	BY MS. VASQUEZ:	16:47	
7	He wasn't sort of chilling back on the couch.	16:46	7	Q. But do you recall testifying to that	16:47	F/A, SP, Lack of
8	BY MS. VASQUEZ:	16:46	8	effect, that Johnny charged at you and you were	16:47	Pers. Know.,
9	Q. Paragraph 15, you write [reading]:	16:46	9	scared?	16:47	Vague/Ambig.
10	"Johnny" -- or, excuse me.	16:46	10	A. He charged towards me --	16:47	
11	Mr. Schwartz, somebody drafted this.	16:46	11	Q. Okay.	16:47	
12	[Reading]:	16:46	12	A. -- and I was scared --	16:47	F/A, SP, Lack of Pers. Know., Vague/Ambig.
13	"Johnny was swinging the	16:46	13	Q. Right.	16:47	
14	magnum-sized bottle and rapidly	16:46	14	A. -- and I ran past him.	16:47	F/A, SP, Lack of Pers. Know., Vague/Ambig.
15	approaching me, and I felt like Johnny	16:46	15	Q. Okay. Why did you have Mr. Schwartz	16:48	
16	was charging at me. Scared. I reacted	16:46	16	delete that exact language that you testified to	16:48	
17	by running past him as soon as he got	16:46	17	today?	16:48	
18	close to me."	16:46	18	A. Because I --	16:48	
19	Why did you delete the words [reading]:	16:46	19	MS. BROOK: Just real quick, Ms. Marz.	16:48	
20	"[...] and I felt like Johnny was	16:46	20	Objection. Misstates the testimony. And	16:48	
21	charging at me. Scared"?	16:46	21	argumentative.	16:48	
22	A. Yeah, I think because...	16:46	22	THE WITNESS: Again, reviewing these	16:48	
23	[Reading]:	16:46	23	documents, trying to remember as much as possible,	16:48	
24	"Johnny was swinging the	16:46	24	being as clear as possible - right? - you know, I	16:48	
25	magnum-sized bottle and rapidly	16:46	25	think part of me was, like, I don't want there to be	16:48	
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1 reports in the paper that says, "Liz Marz charged at	16:48	1 many years ago and in a situation that I was not	16:50
2 by"...	16:48	2 closely connected to, having people reach out to me,	16:50
3 You know, I just don't want my name -- I	16:48	3 texting me why they are seeing my name attached to	16:50
4 didn't -- I just was trying to be as clear as	16:48	4 this, yeah, I would rather speak the truth of what I	16:50
5 possible with what happened, which was he was	16:48	5 experienced and try to stay as far removed as	16:50
6 rapidly approaching me, swinging his magnum-sized	16:48	6 possible.	16:50
7 bottle and, you know...	16:48	7 Q. Even if speaking the truth about what you	16:50
8 Looking back at this that now, I,	16:48	8 experienced on the evening of May 21st, 2016, is	16:50
9 actually, probably would put "scared" back in, to be	16:48	9 going to, in fact, put you in the paper?	16:50
10 honest, because that's the truth. I was scared,	16:48	10 You understand that right, that speaking	16:50
11 which is why I reacted and ran past him out of the	16:49	11 the truth about what you allegedly experienced on	16:50
12 room.	16:49	12 May 21st, 2016, is going to put you at the forefront	16:50
13 BY MS. VASQUEZ:	16:49	13 of this?	16:50
14 Q. You didn't run past him because he told	16:49	14 MS. BROOK: I'll just note for the record	16:50
15 everyone in the penthouse to get out of his	16:49	15 this is a lawsuit and actually not a media battle.	16:50
16 penthouse?	16:49	16 MS. GOLDSTEIN: And I object that it	16:50
17 MS. GOLDSTEIN: Objection.	16:49	17 assumes facts not in evidence.	16:51
18 MS. BROOK: Objection. Misstates	16:49	18 BY MS. VASQUEZ:	16:51
19 testimony.	16:49	19 Q. Okay. Let's go to Paragraph 16. Can you	16:51
20 MS. GOLDSTEIN: Objection. And assumes	16:49	20 please read out loud the sentences that you deleted	16:51
21 facts.	16:49	21 or asked Mr. Schwartz to delete?	16:51
22 THE WITNESS: I ran past him for two --	16:49	22 A. [Reading]:	16:51
23 because he was -- because he ran into the unit, and	16:49	23 "After I left the unit where Rocky's	16:51
24 it scared the shit out of me because he was wasted	16:49	24 jewelry was being prepared, I heard	16:51
25 and screaming.	16:49	25 sounds of destruction and things being	16:51
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1 So that's why I ran out. If there's a	16:49	1 knocked over. I later saw Johnny had	16:51
2 grown ass man coming at you and saying, "Get your	16:49	2 made an absolute mess of the room and	16:51
3 bitch out of here," and swaying a magnum-sized	16:49	3 destroyed a number of" --	16:51
4 bottle of wine, I'm sure -- I don't know what anyone	16:49	4 THE REPORTER: Could you please slow down.	16:51
5 would do. I can't say what anyone would do, but I	16:49	5 THE WITNESS: Sorry. [Reading cont'd]:	16:51
6 ran out.	16:49	6 "I later saw that Johnny had made an	16:51
7 BY MS. VASQUEZ:	16:49	7 absolute mess of the room and destroyed	16:51
8 Q. You have testified several times that you	16:49	8 a number of Rocky's pieces of jewelry	16:51
9 have been concerned about what is going to be	16:49	9 in the process."	16:51
10 reported in the media.	16:49	10 BY MS. VASQUEZ:	16:51
11 MS. BROOK: Objection. Misstates her	16:49	11 Q. Did you have Mr. Schwartz delete those	16:51
12 testimony.	16:49	12 sentences because you actually, in fact, never saw	16:51
13 BY MS. VASQUEZ:	16:49	13 Johnny make, quote [reading]:	16:51
14 Q. What is going to be in the paper. Do you	16:49	14 "An absolute mess of the room and	16:51
15 recall that testimony? You have said it several	16:49	15 destroyed a number of Rocky's pieces of	16:51
16 times today.	16:50	16 jewelry in the process"?	16:51
17 MS. BROOK: Same objection.	16:50	17 A. Yes.	16:51
18 MS. GOLDSTEIN: Join.	16:50	18 Q. Any other reason you asked Mr. Schwartz to	16:51
19 THE WITNESS: As I mentioned before, I	16:50	19 delete that testimony?	16:52
20 want to be as uninvolved in anything that I could	16:50	20 A. Because I -- yeah, because I didn't	16:52
21 possibly be in because it's not -- this isn't a fun	16:50	21 specifically remember hearing sounds of destruction,	16:52
22 experience for me.	16:50	22 things being knocked over.	16:52
23 BY MS. VASQUEZ:	16:50	23 And, you know, I didn't actually see it,	16:52
24 Q. I understand that.	16:50	24 but I do remember at the jewelry bead show the	16:52
25 A. Reliving a night that happened however	16:50	25 following day there were certain beads from the	16:52
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55 (Pages 214 - 217)

1	stuff that we were selling that had been cracked and	16:52	1	her face" if you never told him that you saw visible	16:55
2	broken so --	16:52	2	bruises on Ms. Heard's face?	16:55
3	Q. But you don't --	16:52	3	MS. BROOK: Objection.	16:55
4	A. -- I experienced that.	16:52	4	MS. GOLDSTEIN: Objection.	16:55
5	But no, I did not.	16:52	5	MS. BROOK: Go ahead.	16:55
6	I asked him to delete it because I did not	16:52	6	MS. GOLDSTEIN: Objection. Calls for	16:55
7	see firsthand the mess of the room.	16:52	7	speculation. And misstates prior testimony.	16:55
8	Q. And because you did not see Mr. Depp	16:52	8	MS. BROOK: Join.	16:55
9	actually break those beads, correct?	16:52	9	THE WITNESS: Again, I don't remember what	16:55
10	A. Correct.	16:52	10	I specifically said. I wasn't being careful with my	16:55
11	Q. Can you please pull Exhibit 7, which is	16:52	11	words during that. It was more conversational.	16:55
12	the earlier version of the declaration that is in	16:53	12	This was the opportunity for me to get more	16:55
13	front of you.	16:53	13	specific, so I was very specific.	16:55
14	A. [Witness complies].	16:53	14	So I don't -- I don't know why he wrote	16:55
15	Q. And on Exhibit 7, do you mind going to	16:53	15	that. It could have been something that I said or	16:55
16	Paragraph 18, which is on Page 3.	16:53	16	that he -- yeah, that he heard me say.	16:55
17	A. [Reading]:	16:53	17	BY MS. VASQUEZ:	16:55
18	"Amber had visible bruises on her	16:53	18	Q. And I don't think you testified to this at	16:55
19	face. There was a large red mark on	16:53	19	all, but do you recall seeing Amber on May 23rd,	16:55
20	half the side of her face, which had	16:53	20	2016?	16:55
21	been" -- "which [has] verbally swollen,	16:53	21	A. I don't remember.	16:55
22	and her hair disheveled. Amber was	16:53	22	Q. Do you recall seeing her on May 24th,	16:55
23	also visibly flustered."	16:53	23	2016?	16:55
24	Q. Can you turn to Exhibit 8, please, and	16:53	24	A. I don't remember.	16:55
25	read that version of Paragraph 18.	16:53	25	Q. How about May 25th?	16:55
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1	A. [Reading]:	16:53	1	A. I don't remember.	16:55
2	"Amber's face was visibly red and	16:53	2	Q. May 26th?	16:55
3	swollen. She was very disheveled, and	16:53	3	A. I don't remember.	16:55
4	visibly flustered."	16:53	4	Q. How about May 27th?	16:55
5	Q. Do you recall making those changes to	16:54	5	A. I do not remember.	16:55
6	Paragraph 18 between these two versions?	16:54	6	Q. And I'll represent to you that Ms. Heard	16:55
7	A. Yes.	16:54	7	filed for divorce on May 27th, 2016. Do you recall	16:55
8	Q. Okay. What do you specifically recall	16:54	8	seeing her that day?	16:56
9	changing?	16:54	9	A. I do not.	16:56
10	A. I specifically recall changing that --	16:54	10	Q. Do you recall after May 22nd, when you saw	16:56
11	that part, you know, removing that "Amber had	16:54	11	her at the craft fair that you were at with	16:56
12	visible bruises on her face."	16:54	12	Ms. Pennington, when you saw Ms. Heard again?	16:56
13	Q. Why do you recall -- or, why did you have	16:54	13	A. I don't remember specifically how long it	16:56
14	Mr. Schwartz delete that language?	16:54	14	was until the next time I saw her, but it was	16:56
15	A. Because I had -- I was just getting more	16:54	15	definitely after she filed because -- yeah, that was	16:56
16	specific about what I saw, which was red, swollen --	16:54	16	when -- yeah, it was definitely after that because	16:56
17	It hadn't -- you know, I think right after	16:54	17	that's when it came out into the public so it was	16:56
18	that happened, it's like a bruise doesn't usually	16:54	18	after.	16:56
19	form -- a black-and-blue is what I consider a bruise	16:54	19	Q. So your testimony is that you saw	16:56
20	and it doesn't usually form in that moment.	16:54	20	Ms. Heard on May 22nd, 2016, and then after she	16:56
21	So what I saw was red, swollen, markings	16:54	21	filed for divorce from Mr. Depp?	16:56
22	on her face.	16:54	22	A. From what I remember, there -- yes, I	16:56
23	Q. Do you have any idea why Mr. Schwartz	16:54	23	think so, from what I remember.. I don't remember	16:56
24	would have included in your declaration, previous	16:54	24	seeing her before that. I can't -- I honestly can't	16:56
25	version, that Amber had, quote, "visible bruises on	16:54	25	remember.	16:56
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1 Q. How long after she filed for divorce from	16:56	1 speculation.	16:59
2 Mr. Depp do you recall seeing her?	16:57	2 MS. BROOK: Join. Also, lack of	16:59
3 A. I don't remember. I don't remember.	16:57	3 foundation. Also, assumes facts.	16:59
4 Q. When you saw her after she filed for	16:57	4 And I'll just note that if we go after	16:59
5 divorce, did Ms. Heard still have bruises on her	16:57	5 4:00, I'll just ask that we switch and if you want	16:59
6 face?	16:57	6 to continue your questions after that time, that is	16:59
7 A. I don't remember.	16:57	7 fine.	16:59
8 Q. Sitting here today, do you think you would	16:57	8 THE WITNESS: I don't remember.	16:59
9 remember whether Ms. Heard had bruising on her face	16:57	9 MS. VASQUEZ: Turning to Exhibit 9, or no?	15:58
10 after she filed for divorce on May 27th, 2016?	16:57	10 THE REPORTER: 9 is next the one.	15:58
11 MS. GOLDSTEIN: Objection. Calls for	16:57	11 MS. VASQUEZ: Okay. No.	15:58
12 speculation.	16:57	12 BY MS. VASQUEZ:	15:58
13 MS. BROOK: Join.	16:57	13 Q. So turning to Exhibit 8 --	15:58
14 THE WITNESS: I don't remember because I	16:57	14 THE REPORTER: Oh. I'm sorry.	15:58
15 didn't spend a lot of time with her even when I --	16:57	15 MS. VASQUEZ: No. That's okay. That's	15:58
16 if I did see her.	16:57	16 fine.	15:58
17 BY MS. VASQUEZ:	16:57	17 BY MS. VASQUEZ:	15:58
18 Q. So you don't know one way or another	16:57	18 Q. -- Paragraphs 19, 20, and 21 are all	15:58
19 whether Ms. Heard actually had bruises on her face	16:57	19 highlighted in red by you. Taking as much time as	15:59
20 after she filed for divorce from Mr. Depp when you	16:57	20 you need to review those paragraphs, do you mind	15:59
21 saw her; is that correct?	16:57	21 telling me why you asked that they be deleted?	15:59
22 A. I don't remember how many days after I saw	16:57	22 A. [Witness reviews document].	15:59
23 her, and I don't remember whether she had bruises on	16:57	23 Because I don't remember this specific --	15:59
24 her face or not.	16:57	24 I don't remember the specifics of this. And so even	15:59
25 Q. After May 22nd, 2016, do you recall ever	16:57	25 if I had said it, I took it out. So I very well,	15:59
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1 seeing bruises on Ms. Heard's face, body at all?	16:57	1 again, could have said it, but I don't remember, you	15:59
2 A. I do not remember.	16:57	2 know -- I'm clear that she filed for divorce, but I	15:59
3 Q. If Ms. Heard had been bruised after	16:58	3 don't know how soon after that night. And I don't	15:59
4 May 21st or -- let's say May 22nd, 2016, when you	16:58	4 remember actually if I -- yeah, all of this stuff	15:59
5 last saw her, would you have remembered that?	16:58	5 was foggy to my memory, so I took it out.	15:59
6 MS. GOLDSTEIN: Objection. Calls for	16:58	6 Q. Okay. Turning to Paragraph 20 where it	16:00
7 speculation.	16:58	7 says [reading]:	16:00
8 MS. BROOK: Join. Also, assumes facts not	16:58	8 "We were consoling Amber while Amber	16:00
9 in evidence. Also, lack of personal knowledge.	16:58	9 worried out loud" -- "aloud," excuse	16:00
10 THE WITNESS: I don't know.	16:58	10 me, "about whether or not to report	16:00
11 BY MS. VASQUEZ:	16:58	11 Johnny to the police."	16:00
12 Q. You don't know whether you would have	16:58	12 Is it your testimony today that you don't	16:00
13 remembered that?	16:58	13 remember telling Mr. Schwartz that Amber worried	16:00
14 A. Yeah, I don't know.	16:58	14 aloud whether or not to report Johnny to the police?	16:00
15 Q. When you would see Ms. Heard before	16:58	15 MS. GOLDSTEIN: Objection. Misstates	16:00
16 May 21st, 2016, do you recall ever seeing bruises on	16:58	16 prior testimony.	16:00
17 her?	16:58	17 MS. BROOK: Join.	16:00
18 A. Not that I can remember.	16:58	18 THE WITNESS: You know, what I do remember	16:00
19 Q. Do you recall seeing Ms. Heard in --	16:58	19 was there was conversation about whether she should	16:00
20 sometime in June of 2016?	16:59	20 report Johnny or not. And that's kind of what I	16:00
21 A. Some time in June -- I don't remember.	16:59	21 expressed earlier.	16:00
22 Q. If Ms. Heard had, let's say, a bruised	16:59	22 And how much information she wanted to	16:00
23 left eye, do you recall -- do you think sitting here	16:59	23 give in that moment to the police.	16:00
24 today you would remember that?	16:59	24 So there was conversation around that	16:00
25 MS. GOLDSTEIN: Objection. Calls for	16:59	25 like, just what her next step should be, and I know	16:00
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1	that she was kind of unsure of what to do. But --	16:00
2	yeah, I don't -- I took it out because I don't	16:00
3	really remember specifics about what was said.	16:01
4	BY MS. VASQUEZ:	16:01
5	Q. Turning your attention to the last	16:01
6	sentence of Paragraph 22, do you mind reading that	16:01
7	out loud?	16:01
8	A. Paragraph 22?	16:01
9	Q. The last sentence starting on Line 15?	16:01
10	A. Uh-huh. [Reading]:	16:01
11	"Building to stay for a while in	16:01
12	order to avoid the press."	16:01
13	Q. Read the entire sentence. I'm sorry.	16:01
14	A. I'm sorry. [Reading cont'd]:	16:01
15	"When I mentioned this to Rocky, she	16:01
16	and Amber told me to come over to the	16:01
17	Eastern Columbia building to stay for a	16:01
18	while in order to avoid the press."	16:01
19	Q. And I will note for the record that that	16:01
20	sentence is not highlighted red, correct?	16:01
21	A. Yes. I think -- you know, again, I	16:01
22	haven't signed this, but Rocky specifically was the	16:01
23	one who told me to come over --	16:01
24	Q. Did you --	16:01
25	A. -- to stay.	16:01
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1	Q. And did you stay for a while in order to	16:01
2	avoid the press?	16:01
3	A. I did stay. Yeah. I did go over there	16:01
4	and stay. I don't remember how many nights.	16:01
5	Q. Do you recall when after -- how long after	16:02
6	May 21st, 2016, that you went over to the Eastern	16:02
7	Columbia building to stay?	16:02
8	A. I don't remember the number of days. No.	16:02
9	Q. Not the number of days?	16:02
10	A. Or weeks -- I don't remember.	16:02
11	Q. Do you know when you went over to the	16:02
12	Eastern Columbia building on -- after May 21st,	16:02
13	2016?	16:02
14	A. I don't remember specifically, no.	16:02
15	Q. Safe to assume it was after Amber filed	16:02
16	for divorce?	16:02
17	A. Yes. Yes.	16:02
18	Q. But you don't remember one way or the	16:02
19	other seeing Ms. Heard after she filed for divorce,	16:02
20	correct?	16:02
21	A. I don't remember when I saw her after she	16:02
22	filed for divorce.	16:02
23	Q. But it's your unsigned testimony in this	16:02
24	declaration --	16:02
25	A. Right.	16:02
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1	Q. -- that you stayed after at the Eastern	16:02
2	Columbia building, what one would assume, after	16:03
3	Ms. Heard filed for divorce in order to avoid the	16:03
4	press, correct?	16:03
5	A. Correct.	16:03
6	Q. Okay.	16:03
7	MS. BROOK: And objection. Misstates the	16:03
8	testimony record and improper use of her testimony.	16:03
9	MS. GOLDSTEIN: Join.	16:03
10	BY MS. VASQUEZ:	16:03
11	Q. Paragraph 23, you deleted the sentence	16:03
12	that reads "She often" -- I'm sorry [reading]:	16:03
13	"And she often mentioned that she	16:03
14	felt she could not leave the apartment	16:03
15	except to her lawyers because of the	16:03
16	paparazzi and press."	16:03
17	Why did you have Mr. Schwartz delete that	16:03
18	sentence?	16:03
19	A. Because I didn't remember her actually	16:03
20	saying it. I just remember that being, like, the	16:03
21	feeling of her staying, kind of, like, insular	16:03
22	because she was really having -- she was going	16:03
23	through it. She was having a hard time. And there	16:03
24	was definitely paparazzi and the press so...	16:03
25	Q. Does reading this paragraph 23, where you	16:03
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1	say [reading]:	16:03
2	"These few days were particularly	16:03
3	hard time for Amber. I witnessed her	16:03
4	crying frequently."	16:04
5	And then the last sentence that reads	16:04
6	[reading]:	16:04
7	"At the time, Amber still had a	16:04
8	visible mark on her face from the night	16:04
9	of May 21st."	16:04
10	Does that refresh your recollection as to	16:04
11	whether or not you actually saw Ms. Heard after	16:04
12	May 21st, 2016, with the exception of May 22nd,	16:04
13	2016?	16:04
14	MS. GOLDSTEIN: Objection. Misstates	16:04
15	prior testimony.	16:04
16	THE WITNESS: So I did see her after. I	16:04
17	just mentioned I don't know how long after, but I	16:04
18	assumed it was after she filed for divorce. Right.	16:04
19	Because like I mentioned here, I went after the	16:04
20	press found out only because I was getting harassed	16:04
21	by the press. They were coming to my home. And I	16:04
22	didn't -- I don't have security at the time in my	16:04
23	home.	16:04
24	So I was told "Come over so that you feel	16:04
25	safe and not intruded upon." So I definitely saw	16:04
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F/A, SP, Lack of Pers. Know., Vague/Ambig.	1	her when I did come over. I don't -- not very	16:04	1	Noting your objection on the record.	16:07
	2	often. And I don't remember how many -- you know, I	16:04	2	I'm going to mark as Exhibit Number 9.	16:07
	3	don't remember how many days I stayed and I don't	16:04	3	(Deposition Exhibit 9 was marked for	16:07
	4	remember, like, how much I saw Amber during that	16:05	4	identification and is attached hereto.)	16:07
	5	time. But I know when I did, she was -- there was a	16:05	5	MS. VASQUEZ: Counsel, here is some video	16:07
	6	lot of crying, and a lot of sadness, and a lot of --	16:05	6	clips for you.	16:07
	7	a lot of talking to figuring out stuff, talking to	16:05	7	MS. BROOK: Do you guys have a copy for	16:07
	8	people.	16:05	8	us?	16:07
	9	BY MS. VASQUEZ:	16:05	9	MS. VASQUEZ: Yes. We will give you this	16:07
F/A, SP, Lack of Pers. Know., Vague/Ambig.	10	Q. And she still had a visible mark on her	16:05	10	copy as soon as we are done -- using the -- before	16:07
	11	face?	16:05	11	you show the witness.	16:07
	12	A. So I didn't -- again, I didn't sign this	16:05	12	MS. BROOK: All right.	16:07
	13	declaration. And I don't remember -- I see that	16:05	13	MS. VASQUEZ: Actually, here this one has	16:07
	14	that's here [witness indicates document] and I	16:05	14	been marked, so here you go.	16:07
	15	actually -- and, again, I'm just not remembering	16:05	15	MS. BROOK: Well, the marked copy should	16:07
	16	what her face looked like, specifically.	16:05	16	stay with the court reporter.	16:07
	17	Q. And just --	16:05	17	MS. VASQUEZ: So are you rejecting the	16:07
	18	A. After.	16:05	18	marked copy?	16:07
F/A, SP, Lack of Pers. Know., Vague/Ambig.	19	Q. And just to note -- I'm sorry.	16:05	19	MS. BROOK: I -- in the future, if you	16:07
	20	A. Yeah. I don't remember specifically if I	16:05	20	guys plan on showing video at the --	16:07
	21	ever saw a bruise on her face after.	16:05	21	MS. VASQUEZ: We'll show it to you. We'll	16:07
	22	Q. After?	16:05	22	hand you one. We just had three copies made.	16:07
	23	A. After the initial swollen, like, red	16:05	23	Actually, since --	16:07
	24	marked up face.	16:05	24	MS. GOLDSTEIN: I don't need to watch this	16:07
	25	Q. Okay. And just to note, the sentence that	16:05	25	now.	16:07
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	1	reads [reading]:	16:05	1	MS. VASQUEZ: Right.	16:07
	2	"At the time Amber still had a	16:05	2	MS. BROOK: I am not going to watch it.	16:07
	3	visible mark on her face from the night	16:05	3	MS. GOLDSTEIN: Okay.	16:07
	4	of May 21st."	16:06	4	MS. BROOK: It's going to create a	16:07
	5	That is not highlighted in red, correct?	16:06	5	problem.	16:07
	6	A. Correct.	16:06	6	What I was trying to say before	16:07
	7	MS. BROOK: Ms. Vasquez, I'm going to ask	16:06	7	Ms. Vasquez interrupted is that in the future, we	16:07
	8	are you almost done? And if not --	16:06	8	would be happy to set up audio and visual so we can	16:07
	9	MS. VASQUEZ: We are almost done.	16:06	9	watch it at the same time.	16:07
	10	BY MS. VASQUEZ:	16:06	10	In the meantime, I'll stand over the	16:07
	11	Q. Ms. Marz, we're going to show you some	16:06	11	witness so that I can see what she is seeing.	16:08
	12	very short video clips and I'm going to --	16:06	12	BY MS. VASQUEZ:	16:08
	13	MS. BROOK: So I'm going to object at this	16:06	13	Q. Okay. Ms. Marz, and I appreciate your	16:08
	14	point before you mark your exhibits. At this point,	16:06	14	patience with the setup.	16:08
	15	there's a cutoff on the tape, and counsel for the	16:06	15	A. Uh-huh.	16:08
	16	witness has indicated that she's not going to allow	16:06	16	Q. So you are going to be shown what's been	16:08
	17	her to stay on anymore.	16:06	17	marked as Exhibit Number 9 and it is -- it's a video	16:08
	18	I don't think I am going to use up all my	16:06	18	clip that's been Bates labeled -36. And the clip is	16:08
	19	time, but I ask that we switch. And if you guys	16:06	19	from the 2-minute 50-second point.	16:08
	20	want to continue afterwards, we can do so.	16:06	20	And I will represent to you that these are	16:08
	21	MS. VASQUEZ: I understand your position,	16:06	21	surveillance videos taken at the Eastern Columbia	16:09
	22	Davida, but I'm going to respectfully decline the	16:06	22	building. And the date is below, I believe, on the	16:09
	23	switch at this time. I have a couple more minutes	16:06	23	left-hand side. And that video clip that you are	16:09
	24	left. It should be very short. So as soon as we	16:06	24	being shown -- about to be shown is dated May 24th,	16:09
	25	are done, I would be happy to switch with you.	16:06	25	2016?	16:09
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F/A, SP, Lack of Pers. Know.	1	MS. BROOK: Let me just make my objection.	16:09	1	what you just saw in the video clip Bates	16:13	F/A, SP, Lack of Pers. Know.
	2	Counsel's representations aside, these	16:09	2	labeled -42?	16:13	
	3	video clips have not been authenticated, there is no	16:09	3	A. I saw, again, the same women get in the	16:13	
	4	custodian of records document that was produced in	16:09	4	elevator and then get out of the elevator.	16:13	
	5	connection with them, and so we object to the use of	16:09	5	Q. And what is the date on that video clip?	16:13	
	6	them at this time.	16:09	6	A. May 24th, 2016.	16:13	F/A, SP, Lack of Pers. Know.
	7	MS. GOLDSTEIN: And I'll also object on	16:09	7	Q. And did --	16:13	
	8	the basis that we have never seen them before and I	16:09	8	MS. GOLDSTEIN: Just to be clear for the	16:13	
	9	don't believe Ms. Marz has.	16:09	9	record, Ms. Marz is reading what is written on the	16:13	
	10	MS. VASQUEZ: Thank you.	16:09	10	screen.	16:13	
	11	(Video deposition Exhibit 9 was played	16:09	11	MS. VASQUEZ: That's fine.	16:13	F/A, SP, Lack of Pers. Know.
	12	in the deposition room).	16:09	12	BY MS. VASQUEZ:	16:13	
	13	BY MS. VASQUEZ:	16:10	13	Q. Ms. Marz, did you see any marks on	16:14	
	14	Q. Ms. Marz, do you mind -- or, describing	16:10	14	Ms. Heard's face in that video clip?	16:14	
	15	for me what you just saw on the tape?	16:10	15	A. Very hard -- really hard to see to tell.	16:14	
	16	MS. BROOK: Can you note the second mark	16:10	16	Q. Going to show you what's been Bates	16:14	F/A, SP, Lack of Pers. Know.
	17	when the clip ended.	16:10	17	stamped video clip -51, and it's from 2:50 to 3:23?	16:14	
	18	MS. VASQUEZ: Yes, absolutely.	16:10	18	MS. BROOK: I'm going to do the same	16:14	
	19	MS. GOODARZI: 3:30.	16:10	19	objections. And I'll also add to this clip and as	16:14	
	20	MS. VASQUEZ: 3:30.	16:10	20	well as the previous two clips that these videos	16:14	
F/A, SP, Lack of Pers. Know.	21	THE WITNESS: I saw Amber, Whitney, and	16:10	21	were produced yesterday evening. I understand most	16:14	F/A, SP, Lack of Pers. Know.
	22	Raquel get in an elevator and then exit	16:10	22	if not all of them have been edited, such that they	16:14	
	23	BY MS. VASQUEZ:	16:10	23	are missing certain time ranges, and thus, are not	16:14	
	24	Q. Okay. And Whitney is Whitney Heard, is	16:10	24	complete.	16:14	
	25	that correct, Ms. Heard's sister?	16:10	25	MS. GOLDSTEIN: And I'd also like to add	16:14	
			Page 234			Page 236	F/A, SP, Lack of Pers. Know.
	1	A. Correct.	16:10	1	and ask, Ms. Marz is obviously not a percipient to	16:14	
	2	Q. In the video clip, did Ms. Heard appear to	16:10	2	whatever is being shown in these videos.	16:14	
	3	have any marks on her face?	16:10	3	And given that we're so far over time, I'd	16:15	
	4	A. Kind of, yeah. It looks like she had a	16:11	4	like to ask why they are being shown to her.	16:15	
	5	little mark, something on her face.	16:11	5	MS. VASQUEZ: We can discuss that off the	16:15	F/A, SP, Lack of Pers. Know.
	6	Q. On what side?	16:11	6	record. I don't -- you are not -- I'm not -- I'm	16:15	
	7	A. On the right.	16:11	7	not the deponent. So you can ask me any questions	16:15	
	8	Q. Okay.	16:11	8	you want off the record, and I'll be happy to	16:15	
	9	MS. VASQUEZ: Mona, do you mind, please,	16:11	9	show -- share with you.	16:15	
	10	marking up Number 42.	16:11	10	MS. GOODARZI: I'll go ahead and play.	16:15	F/A, SP, Lack of Pers. Know.
	11	(Discussion between counsel held off	16:11	11	(Video deposition Exhibit 9 was	16:15	
	12	the record.)	16:12	12	played in the deposition room).	16:16	
	13	MS. GOODARZI: You want me to play it?	16:12	13	BY MS. VASQUEZ:	16:16	
	14	BY MS. VASQUEZ:	16:12	14	Q. Ms. Marz, finally, could you, please	16:16	
F/A, SP, Lack of Pers. Know.	15	Q. So, Ms. Marz, we're going to show you	16:12	15	explain to me what you just -- what you just watched	16:16	F/A, SP, Lack of Pers. Know.
	16	what's been Bates labeled video clip Number -42 and	16:12	16	on the Video Clip 51?	16:16	
	17	the clip range starts at 16 and goes through 1:19 --	16:12	17	A. I saw Amber get in an elevator and then	16:16	
	18	one minute, 19 seconds.	16:12	18	towards the end, I think -- that might have been	16:16	
	19	MS. BROOK: Same objections to this video.	16:12	19	Josh getting out, but I couldn't tell until the very	16:16	
	20	MS. VASQUEZ: That's fine.	16:12	20	end. I thought it might be him.	16:16	F/A, SP, Lack of Pers. Know.
	21	MS. GOLDSTEIN: Same objections.	16:12	21	Q. Did you see any marks on Ms. Heard's face	16:16	
	22	(Video deposition Exhibit 9 was	16:12	22	in that video clip?	16:16	
	23	played in the deposition room).	16:13	23	A. I really just saw the back of her head.	16:16	
	24	BY MS. VASQUEZ:	16:13	24	Q. Okay. So is that a "no"?	16:16	
	25	Q. Mr. Marz, do you mind describing to me	16:13	25	A. Right.	16:16	F/A, SP, Lack of Pers. Know.
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1 Q. You couldn't see any marks on her face -- 16:16
2 A. Right. 16:16
3 Q. -- correct? 16:16
4 MS. VASQUEZ: Okay. We're done. 16:16
5 BY MS. VASQUEZ: 16:16
6 Q. Do you recall Ms. Heard ever telling you 16:17
7 that she had a friend that worked at People 16:17
8 Magazine? 16:17
9 A. No. 16:17
10 Q. Do you recall Ms. Pennington ever telling 16:17
11 you that Ms. Heard had a connection or a friend that 16:17
12 worked at People Magazine? 16:17
13 A. No. 16:17
14 Q. At this time, I have nothing further, and 16:17
15 I thank you very much for your patience and 16:17
16 testimony -- 16:17
17 A. Thank you. 16:17
18 Q. -- Ms. Marz. 16:17
19 MS. VASQUEZ: So we'll go off the record 16:17
20 and switch places with Ms. Brook, who is counsel for 16:17
21 Ms. Heard. 16:17
22 THE VIDEOGRAPHER: This marks the end of 16:17
23 Media Number 3. Going off the record at 4:18 p.m. 16:17
24 (Brief recess.) 16:41
25 THE VIDEOGRAPHER: This marks the 16:41
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1 beginning of Media Number 4. Going back on the 16:41
2 record at 4:42 p.m. 16:41
3 16:41
4 EXAMINATION 16:41
5 BY MS. BROOK: 16:41
6 Q. Good afternoon, Ms. Marz. 16:41
7 A. Good afternoon. 16:41
8 Q. My name is Davida Brook, and I'm an 16:41
9 attorney for Ms. Heard in this matter. I want to 16:41
10 thank you again for taking the time to be with us 16:41
11 today. 16:41
12 I understand that counsel for Mr. Depp has 16:42
13 used a little bit over four hours of the tape time. 16:42
14 The parties have an agreement where each side would 16:42
15 use about half the tape time, three and a half. I 16:42
16 will do my best to limit myself to the seven hours 16:42
17 of tape time, so we can get you out of here on time. 16:42
18 As Ms. Vasquez explained this morning, I'm 16:42
19 going to have some questions for you today. If at 16:42
20 any point you don't understand my question, just ask 16:42
21 me to clarify, and I will do so. 16:42
22 Similarly, if at any point you need to 16:42
23 take a break, just let me know, and we can take a 16:42
24 break. Sound good? 16:42
25 A. Yes. 16:42
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1 Q. Prior to the deposition today, have you 16:42
2 and I ever met in person? 16:42
3 A. No. 16:42
4 Q. Prior to the deposition today, have you 16:42
5 and I ever spoken on the phone? 16:42
6 A. No. 16:42
7 Q. Prior to the deposition today, have you 16:42
8 and I ever communicated in any way whatsoever? 16:42
9 A. No. 16:42
10 Q. To clarify, earlier today you testified 16:42
11 you met with a lawyer in order to help prepare for 16:42
12 your deposition today; I was not that lawyer, 16:42
13 correct? 16:42
14 A. Yes. 16:42
15 Q. Just before the break, counsel for 16:43
16 Mr. Depp, Ms. Vasquez, showed you some video clips. 16:43
17 Do you recall that? 16:43
18 A. Yes. 16:43
19 Q. I believe she showed you three video 16:43
20 clips; they were marked as Depp Exhibit 9. 16:43
21 I would like to mark -- oh, before I mark 16:43
22 anything, let me do this. 16:43
23 Have you ever seen those video clips 16:43
24 before? 16:43
25 A. No. 16:43
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1 Q. Do you know how those video clips were 16:43 F/A, SP, Lack
2 collected? 16:43 of Pers. Know.
3 A. No. 16:43
4 Q. Do you know who collected the video clips? 16:43
5 A. No. 16:43

6 Q. Do you know when those video clips were 16:43
7 collected? 16:43
8 A. I just heard that they were collected last 16:43
9 night. 16:43
10 Q. They were produced last night. 16:43
11 A. Produced last night. 16:43

12 Q. Do you know when they were collected from 16:43 F/A, SP, Lack
13 the Eastern Columbia building Security Footage 16:43 of Pers. Know.
14 Repository? 16:43
15 A. No. 16:43

16 Q. Do you know whether one those video clips 16:43
17 were collected, all of the video footage from that 16:43
18 time period May 21st, 22nd was collected? 16:43
19 A. I don't know. 16:43
20 MS. BROOK: I'd like to mark Exhibit 10. 16:43
21 (Deposition Exhibit 10 was marked for 16:43
22 identification and is attached hereto.) 16:43
23 BY MS. BROOK: 16:43

24 Q. It's a still from one of the videos that 16:44 F/A, SP, Lack
25 you were shown just a few minutes ago. 16:44 of Pers. Know.
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	<p>1 The court reporter will hand you your 16:44</p> <p>2 copy. 16:44</p> <p>3 THE REPORTER: [Reporter hands witness a 16:44</p> <p>4 Exhibit]. 16:44</p> <p>5 BY MS. BROOK: 16:44</p> <p>6 Q. So this is a still of one of the three 16:44</p> <p>7 videos that you watched just a little bit ago; you 16:44</p> <p>8 remember watching those videos, correct? 16:44</p> <p>9 A. Yes. 16:44</p> <p>10 Q. And you remember being asked about whether 16:44</p> <p>11 or not you could see any marks on Ms. Amber's 16:44</p> <p>12 face -- on Ms. Heard's face during those videos, 16:44</p> <p>13 correct? 16:44</p> <p>14 A. Correct. 16:44</p> <p>15 Q. And you remember testifying that in some 16:44</p> <p>16 of the videos you thought you could, correct? 16:44</p> <p>17 A. Correct. 16:44</p> <p>18 Q. So Exhibit 10 is from the second video 16:44</p> <p>19 clip you were shown, which was Depp -42 is the Bates 16:44</p> <p>20 label. The timestamp is 23:19:10:92:7. The date is 16:44</p> <p>21 May 24th, 2016. 16:44</p> <p>22 You testified earlier that you don't 16:44</p> <p>23 recall whether or not you saw Ms. Heard on May 24th, 16:45</p> <p>24 2016, correct? 16:45</p> <p>25 A. Correct. 16:45</p> <p>Page 242</p>	<p>1 And will you just remind us what side of 16:46</p> <p>2 Ms. Heard's face you recall the marks being on on 16:46</p> <p>3 May 21st, 2016? 16:46</p> <p>4 A. The right side of her face. 16:46</p> <p>5 Q. Thank you. You can put that aside. 16:46</p> <p>6 A. [Witness complies]. 16:46</p> <p>7 Q. Also, before -- or also earlier today, 16:46</p> <p>8 Ms. Vasquez was asking you about a conversation you 16:46</p> <p>9 had with Ms. Heard's former attorney, Richard 16:46</p> <p>10 Schwartz. 16:46</p> <p>11 Do you remember that? 16:46</p> <p>12 A. Yes. 16:46</p> <p>13 Q. I said former attorney. Are you aware of 16:46</p> <p>14 whether or not Mr. Schwartz is still counsel for 16:46</p> <p>15 Ms. Heard in this matter? 16:46</p> <p>16 A. I saw his name on the subpoena. That's as 16:46</p> <p>17 much as I know. 16:46</p> <p>18 Q. But you don't know whether he's still 16:46</p> <p>19 counsel of record in this case? 16:46</p> <p>20 A. I do not know. 16:46</p> <p>21 Q. And you indeed met with Mr. Schwartz, 16:46</p> <p>22 correct? 16:46</p> <p>23 A. Correct. 16:46</p> <p>24 Q. Was Ms. Heard present when you met with 16:47</p> <p>25 Mr. Schwartz? 16:47</p> <p>Page 244</p>	Vague/Ambig.
Vague/Ambig.			
F/A, SP, Lack of Pers. Know.	<p>1 Q. But you can see her on this video footage 16:45</p> <p>2 still, correct? 16:45</p> <p>3 A. Correct. 16:45</p> <p>4 Q. So I'm going to mark a new exhibit of the 16:45</p> <p>5 same exact video footage. It's going to be 16:45</p> <p>6 Exhibit 11, the same still. And I'm going to ask 16:45</p> <p>7 that if you see any marks on Ms. Heard's face in 16:45</p> <p>8 that Exhibit 11, the court reporter will hand you 16:45</p> <p>9 the new document, you indicate where they are on the 16:45</p> <p>10 document by circling it? 16:45</p> <p>11 A. Uh-huh. You want me to circle that one 16:45</p> <p>12 [witness indicates document]. 16:45</p> <p>13 (Deposition Exhibit 11 was marked for 16:45</p> <p>14 identification and is attached hereto.) 16:45</p> <p>15 BY MS. BROOK: 16:45</p> <p>16 Q. So do you see any marks on Ms. Heard's 16:45</p> <p>17 face in this exhibit -- I'm sorry, Marz Exhibit 11? 16:45</p> <p>18 A. There's a -- a slight shadow under her 16:45</p> <p>19 right -- yeah, under her right eye. It's hard for 16:45</p> <p>20 me to tell if it's -- what it is, but there is a 16:45</p> <p>21 shadow there. 16:46</p> <p>22 Q. Will you circle where you see the shadow 16:46</p> <p>23 on Exhibit 11, please. 16:46</p> <p>24 A. [Witness writes on exhibit]. 16:46</p> <p>25 Q. Thank you. 16:46</p> <p>Page 243</p>	<p>1 A. No. 16:47</p> <p>2 Q. Was there a court reporter there like 16:47</p> <p>3 there is today? 16:47</p> <p>4 A. No. 16:47</p> <p>5 Q. Was counsel for Mr. Depp there like they 16:47</p> <p>6 are today? 16:47</p> <p>7 A. No. 16:47</p> <p>8 Q. So that wasn't a deposition, correct? 16:47</p> <p>9 A. Correct. 16:47</p> <p>10 Q. How would you describe what that 16:47</p> <p>11 conversation was? 16:47</p> <p>12 A. It was -- I would describe it as just 16:47</p> <p>13 that, a conversation. Very informal. Very brief, 16:47</p> <p>14 like, in and out. Very -- yeah, informal, brief, 16:47</p> <p>15 and there was another woman in the room, which I 16:47</p> <p>16 assumed was the note -- someone that was taking 16:47</p> <p>17 notes. But it was very conversational and just 16:47</p> <p>18 informal. 16:47</p> <p>19 Q. And did Mr. Schwartz tell you in that 16:47</p> <p>20 meeting that he would be drafting a draft 16:47</p> <p>21 declaration for your review and comment? 16:47</p> <p>22 A. I think so. 16:47</p> <p>23 Q. If you could turn back to Exhibit 8, Marz 16:47</p> <p>24 8? 16:48</p> <p>25 A. [Witness complies]. 16:48</p> <p>Page 245</p>	
F/A, SP, Lack of Pers. Know.			

1	Q. This is a document we looked at earlier	16:48	1	include those"?	16:49
2	today. It's one of the e-mail exchanges between you	16:48	2	A. No.	16:49
3	and Mr. Schwartz.	16:48	3	Q. He didn't write you back and say, "This	16:49
4	Do you recall looking at this exhibit?	16:48	4	renders this document useless"?	16:49
5	A. Yes.	16:48	5	A. No.	16:49
6	Q. And if you look at the page -- we call	16:48	6	Q. Okay. Did he ever tell you he would not	16:49
7	these weird numbers at the bottom Bates labels -- if	16:48	7	incorporate them?	16:49
8	you look at Depp v. Heard EM -028.	16:48	8	A. No.	16:49
9	Do you see that?	16:48	9	Q. Following the e-mail that you produced	16:49
10	A. Yep.	16:48	10	this morning, where you sent him some edits on	16:50
11	Q. That bottom of that page, there's an	16:48	11	August 8th, 2019, and I'm looking on the first page	16:50
12	e-mail from Richard Schwartz to you dated Thursday,	16:48	12	of Marz 8, did you ever hear from Mr. Schwartz	16:50
13	July 11th, 2019, at 9:45 a.m.	16:48	13	again?	16:50
14	Do you see that?	16:48	14	A. Yes.	16:50
15	A. I do.	16:48	15	Q. When?	16:50
16	Q. And he says [reading]:	16:48	16	A. I don't remember the specific dates.	16:50
17	"Liz, thanks for taking the time to	16:48	17	Q. And what was the nature of the	16:50
18	meet with us yesterday. Attached,	16:48	18	communication?	16:50
19	please, find a draft declaration for	16:48	19	A. He wanted to chat about -- about it. Chat	16:50
20	you to review."	16:48	20	with me about the final edit to the declaration.	16:50
21	Do you see that?	16:48	21	Q. And did you ever have that conversation?	16:50
22	A. Uh-huh.	16:48	22	A. A short, brief conversation, yes.	16:50
23	Q. Did you consider this to be a final	16:48	23	Q. Did he ever follow up with you to get your	16:50
24	declaration when you received it?	16:48	24	signature on the signed declaration?	16:50
25	A. No.	16:48	25	A. No.	16:50
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1	Q. [Reading cont'd]:	16:48	1	Q. And you didn't affirmatively offer to	16:50
2	"As I mentioned yesterday, please	16:48	2	provide it?	16:50
3	feel free to give me a call to discuss	16:48	3	A. Exactly, yes.	16:50
4	if you have any questions or comments."	16:48	4	Q. You can put that away.	16:50
5	Do you see that?	16:48	5	A. [Witness complies].	16:50
6	A. I do.	16:49	6	Q. Way earlier today, you testified that you	16:50
7	Q. Did you understand Mr. Schwartz to be	16:49	7	met Ms. Heard in around, I believe, it was 2003 or	16:51
8	inviting you to make comments on the declaration?	16:49	8	2004.	16:51
9	A. Yes.	16:49	9	Do you recall that testimony?	16:51
10	Q. Did you, in fact, make comments on the	16:49	10	A. Yes.	16:51
11	declaration?	16:49	11	Q. And you met because you and Ms. Heard were	16:51
12	A. Yes.	16:49	12	working in retail together in Texas; is that right?	16:51
13	Q. And you sent some of those comments to	16:49	13	A. Yes.	16:51
14	Mr. Schwartz, correct?	16:49	14	Q. How would you describe your relationship	16:51
15	A. Correct.	16:49	15	with Ms. Heard around that time period, 2003, 2004?	16:51
16	Q. And you sent those comments after	16:49	16	A. Very minimal. I mean, she -- she had --	16:51
17	carefully reviewing the declaration, correct --	16:49	17	she was a new friend, a new friend of Raquel's and	16:51
18	strike that.	16:49	18	so it was very -- introduced through Raquel and	16:51
19	You sent those comments after carefully	16:49	19	maybe had a couple of hangouts that summer. We	16:51
20	reviewing the draft declaration, correct?	16:49	20	crossed paths at that retail shop that one day and	16:51
21	A. Correct.	16:49	21	then maybe had, like, a couple of hangouts that	16:51
22	Q. Did Mr. Schwartz ever push back in any way	16:49	22	summer.	16:51
23	in response to the edits that you sent him?	16:49	23	Q. So you and Ms. Heard didn't work side by	16:51
24	A. No.	16:49	24	side at that retail shop for the summer?	16:51
25	Q. He didn't call you up and say, "We can't	16:49	25	A. No. Not for the summer. We -- we worked	16:51
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F/A, SP, Lack of Pers. Know., R	1	together one day and that -- not even a full day	16:51	1	Q. Has Ms. Heard ever done you any special	16:54
	2	that I remember.	16:51	2	favours?	16:54
	3	Q. Would you describe yourself as having been	16:51	3	A. No.	16:54
	4	close friends with Ms. Heard during that time	16:51	4	Q. Do you feel indebted to Ms. Heard in any	16:54
	5	period?	16:52	5	way?	16:54
	6	A. I wouldn't, no.	16:52	6	A. No.	16:54
	7	Q. Ms. Marz, where are you from originally?	16:52	7	Q. Earlier today you testified that you have	16:54
	8	A. Austin, Texas.	16:52	8	met Johnny Depp on a few occasions, correct?	16:54
	9	Q. And when did you first move to	16:52	9	A. Uh-huh. Correct.	16:54
	10	Los Angeles?	16:52	10	Q. And you said that the first time you were	16:54
	11	A. February of 2016.	16:52	11	going to meet Mr. Depp, you were excited about that,	16:54
F/A, SP, Lack of Pers. Know., R	12	Q. Since moving to Los Angeles in	16:52	12	correct?	16:54
	13	February 2016, about how many times have you hung	16:52	13	A. Correct.	16:54
	14	out with Ms. Heard in person?	16:52	14	Q. Because you were a fan of his work?	16:54
	15	A. It's hard to say how many times.	16:52	15	A. Correct.	16:54
	16	Q. I don't want you to guess.	16:52	16	Q. And in the few occasions where you have	16:54
F/A, SP, Lack of Pers. Know., R	17	A. Yeah. I don't --	16:52	17	met Mr. Depp, excluding May 21, 2016, how did he	16:54
	18	Q. Was it a daily occurrence?	16:52	18	treat you?	16:54
	19	A. No.	16:52	19	A. Nice.	16:54
	20	Q. Was it a weekly occurrence?	16:52	20	Q. Nice guy?	16:54
	21	A. No.	16:52	21	A. Yeah.	16:54
	22	Q. Would you describe it as a regular	16:52	22	Q. You don't have any ill will towards	16:54
	23	occurrence?	16:52	23	Mr. Depp, do you?	16:54
	24	A. At one portion, earlier on when I had	16:52	24	A. No.	16:55
	25	moved here, it was more regular than now.	16:52	25	Q. We have talked a lot today about a woman	16:55
			Page 250			Page 252
R	1	Q. About -- and now, about how often do you	16:52	1	name Raquel Pennington, and just for the record, can	16:55
	2	meet with Ms. Heard?	16:52	2	you confirm that Raquel is sometimes referred to as	16:55
	3	A. Close to never.	16:52	3	Rocky?	16:55
	4	Q. And when did it stop being a regular	16:52	4	A. Yes.	16:55
	5	occurrence?	16:52	5	Q. Thank you.	16:55
	6	A. I don't remember but I -- I mean, I don't	16:52	6	What is your current relationship with	16:55
	7	think I have seen her -- I can't remember the last	16:53	7	Ms. Pennington?	16:55
	8	time I actually saw her.	16:53	8	A. My current relationship is we're friends.	16:55
R	9	Q. How would you describe your relationship	16:53	9	And we don't -- but we don't have the same tight	16:55
	10	with Ms. Heard around the time of May 2016?	16:53	10	knit group of friends. So she is not someone who I	16:55
	11	A. Very new. And even though we knew each	16:53	11	see every weekend, who is part of my intimate	16:55
	12	other and had met and whatnot, we weren't super	16:53	12	circle, but she is someone who I love and have, you	16:55
	13	close.	16:53	13	know, a lot of history with. I also live on the	16:55
	14	Q. Were you ever super close friends with	16:53	14	west side, she lives on the east side, you know how	16:55
	15	Ms. Heard?	16:53	15	that goes.	16:55
	16	A. Not really, no. Not -- always very much	16:53	16	Q. Forget about it.	16:55
	17	through Raquel.	16:53	17	A. Yeah. So she told me -- she said to me,	16:55
	18	Q. And how would you describe your	16:53	18	"If you move to the west side, I'll see you for	16:56
	19	relationship with Ms. Heard presently, as we sit	16:53	19	maybe birthday and holidays." And we still don't	16:56
	20	here today?	16:53	20	see each other for that. So -- but, you know,	16:56
	21	A. I -- I mean, we -- we don't interact very	16:53	21	there's no hard feelings.	16:56
	22	often. If I were to see her, it would be great to	16:53	22	Q. I understand that you asked Ms. Pennington	16:56
	23	see her. And -- there's no hard feelings at all.	16:54	23	whether she ever received a subpoena in this case,	16:56
	24	We're -- I have a lot of love for her, and we are	16:54	24	correct?	16:56
	25	just not super close.	16:54	25	A. Correct.	16:56
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H	1	Q. Did Ms. Pennington ever call you up and	16:56	1	did a little bit of fashion, a little bit of -- just	16:58	
	2	say "You must sit for a deposition in this case"?	16:56	2	going to people's homes and doing their makeup for	16:58	
	3	A. No.	16:56	3	events, and then mostly weddings. And then	16:58	
	4	Q. Did she ever tell you, you had to do it	16:56	4	obviously stuff that was involved in the salon.	16:58	
	5	for Amber?	16:56	5	Q. And to clarify, have you ever done	16:58	Vague/Ambig.
	6	A. No.	16:56	6	Ms. Heard's makeup?	16:58	L
	7	Q. Did anyone ever tell you that?	16:56	7	A. No.	16:58	
	8	A. No.	16:56	8	Q. On any occasion?	16:58	
	9	Q. Earlier today you were asked about a	16:56	9	A. Never.	16:58	
	10	gentleman named Josh Drew.	16:56	10	Q. You testified earlier today that Ms. Heard	16:58	Vague/Ambig.
	11	Do you remember that?	16:56	11	often, in the times you saw her, would not be	16:58	L
	12	A. Yes.	16:56	12	wearing makeup; is that correct?	16:58	
	13	Q. And that's Ms. Pennington's ex-husband,	16:56	13	A. Correct.	16:58	
	14	correct?	16:56	14	Q. Is it possible in some of those times that	16:58	
	15	A. Correct.	16:56	15	she was wearing the type of makeup we, ladies,	16:58	
	16	Q. What is your current relationship with	16:56	16	sometimes use to not appear as though we are wearing	16:58	
H	17	Mr. Drew?	16:56	17	makeup?	16:59	
	18	A. There is no relationship currently.	16:56	18	A. Yeah.	16:59	
	19	Q. So I take it you have never talked to	16:56	19	Q. So you wouldn't necessarily be able to	16:59	
	20	Mr. Drew about this -- sorry -- yes, Mr. Drew about	16:56	20	tell whether she was wearing basic concealer or	16:59	
	21	this litigation?	16:57	21	foundation?	16:59	
	22	A. No.	16:57	22	A. Correct.	16:59	
	23	Q. And so he never told you, "You got to sit	16:57	23	Q. I would like you to turn back to what was	16:59	
	24	for a deposition in this case," correct?	16:57	24	marked earlier today as Marz Exhibit 2.	16:59	
	25	A. Correct.	16:57	25	A. [Witness complies].	16:59	
			Page 254				Page 256
	1	Q. Or "You got to do it for Amber's sake"?	16:57	1	Q. So this is a text message that you	16:59	
	2	A. Correct.	16:57	2	produced in this lawsuit. And in it, Ms. Heard	16:59	
	3	Q. Earlier today you testified that some	16:57	3	writes to you [reading]:	16:59	
	4	years back you worked as a makeup artist.	16:57	4	"Hey, babe. Is it okay if my lawyer	16:59	
	5	Do you remember that?	16:57	5	calls you to talk to you just on	16:59	
	6	A. Yes.	16:57	6	background? It would be extremely	16:59	
	7	Q. About what year was that?	16:57	7	helpful to me and wouldn't jeopardize	16:59	
	8	A. Oh, it was over a span of years. I think	16:57	8	or compromise your anonymity or privacy	16:59	
	9	I went to makeup school about a year after I moved	16:57	9	at all because it's my lawyers. He	16:59	
	10	to New York, so it was either 2008, 2009. And then,	16:57	10	just needs some background from other	16:59	
	11	you know, was, I guess, for that span of time	16:57	11	perspectives surrounding certain	16:59	
	12	after -- even when I started working, you know, on	16:57	12	events, like that night" -- "like that	16:59	
	13	the business side of things, I would still do random	16:57	13	one night" - excuse me - "you were	16:59	
	14	makeup jobs here and there. But always, like,	16:57	14	there."	16:59	
	15	weddings and, you know, like, just sort of beauty	16:57	15	Do you see that?	16:59	
	16	makeup was my -- my specialty. I didn't really do	16:57	16	A. Yes.	16:59	
	17	that -- I stopped -- when I moved to L.A., I kind of	16:57	17	Q. And reading through the rest of the text	17:00	
	18	stopped.	16:58	18	message thread on this page, you just say -- you	17:00	
	19	Q. So you actually anticipated my next	16:58	19	responded to Amber simply by saying [reading]:	17:00	
	20	question, which was going to be what type of makeup	16:58	20	"I'll call him back. XX."	17:00	
	21	work did you do when you were working as a makeup	16:58	21	Do you see that?	17:00	
	22	artist?	16:58	22	A. Yes.	17:00	
	23	A. So I worked at a salon for the first part	16:58	23	Q. So nowhere in this thread did Ms. Heard	17:00	
	24	of it. And I was -- so that you, you know,	16:58	24	identify specifically May 21st, 2016, correct?	17:00	
	25	obviously, making people look beautiful. And then	16:58	25	MS. VASQUEZ: Objection. Leading.	17:00	
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65 (Pages 254 - 257)

1 MS. BROOK: I'll rephrase the question. 17:00	1 A. [Witness complies]. 17:02
2 BY MS. BROOK: 17:00	2 Q. You testified earlier today that you saw 17:02
3 Q. So Ms. Heard tells you that her lawyer 17:00	3 Ms. Heard on May 21, 2016, correct? 17:02
4 wants background, quote [reading]: 17:00	4 A. Correct. 17:02
5 "Surrounding certain events like 17:00	5 Q. And you saw Mr. Depp on that same day, 17:02
6 that one night you were there." 17:00	6 correct? 17:02
7 Do you see that? 17:00	7 A. Uh-huh. Correct. 17:02
8 A. Yes. 17:00	8 Q. Where were you where you saw Ms. Heard and 17:02
9 Q. Did you know from those words on the page 17:00	9 Mr. Depp? 17:02
10 what night Ms. Heard was referring to? 17:00	10 A. I was in the various penthouse apartments 17:02
11 A. Yes. 17:00	11 in the Eastern Columbia building. 17:02
12 Q. What night was she referring to? 17:00	12 Q. And I would like to mark as Marz 12. It's 17:02
13 A. The night of -- the night in May of 2016. 17:00	13 an architectural rendering of the various 17:03
14 Q. May -- do you remember the date? 17:00	14 penthouses. If at any point in time it's helpful 17:03
15 A. May 21st. 17:00	15 for you to refer to the document, you are more than 17:03
16 Q. And how did you know that Ms. Heard was 17:00	16 welcome to. I might ask you some questions about 17:03
17 referring to that night? 17:00	17 it, but it's also just there for your use to -- 17:03
18 A. Because it was the only night where I was 17:00	18 should you need it. 17:03
19 present during -- it was -- it was a night to 17:00	19 (Deposition Exhibit 12 was marked for 17:03
20 remember. I mean it was -- I remember that night. 17:00	20 identification and is attached hereto.) 17:03
21 It was hard to forget and it was only -- yeah. 17:00	21 BY MS. BROOK: 17:03
22 Q. You say it was a night to remember or hard 17:01	22 Q. About what time did you arrive at the 17:03
23 to forget. Talk to me what you mean about that. 17:01	23 Eastern Columbia building? 17:03
24 A. I mean, you know, having just moved to 17:01	24 A. I don't remember. 17:03
25 L.A. in February, in May having been present for 17:01	25 MS. VASQUEZ: Vague as to time. 17:03
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1 this type of experience was definitely like -- like 17:01	1 BY MS. BROOK: 17:03
2 a very big deal, I would say, for me. 17:01	2 Q. Morning? Afternoon? Night? 17:03
3 So -- so -- yeah, I mean, I think it was 17:01	3 A. Afternoon. 17:03
4 just -- it was definitely, like, a night that was -- 17:01	4 Q. And where did you go when you got there? 17:03
5 it was a dramatic evening and there was -- you know, 17:01	5 A. I don't remember specifically where I 17:03
6 it was the only night that -- you know, that she 17:01	6 first went, but most of the evening -- or not most 17:03
7 would have been referring to. 17:01	7 of the evening, but soon after into Amber's studio. 17:03
8 Q. And when you say quote, "this type of 17:01	8 Q. The penthouse that Ms. Heard used as her 17:03
9 experience," do you mean getting to hang out with 17:01	9 studio, correct? 17:04
10 Amber Heard and Johnny Depp? 17:01	10 A. Correct. 17:04
11 A. No. 17:01	11 Q. And who was there? Who were you hanging 17:04
12 Q. What do you -- what are you referring to? 17:01	12 out with in that studio? 17:04
13 A. I'm referring to, like, being a witness to 17:01	13 A. Throughout the evening, it was in that 17:04
14 like -- to what I saw. To seeing the aftermath of 17:01	14 studio hanging was Raquel, Amber, myself and Josh. 17:04
15 the situation that was, you know, really intense and 17:01	15 Q. And what was the purpose of you going over 17:04
16 emotional. 17:02	16 there? 17:04
17 Q. And I know you already had to talk about 17:02	17 A. To assist in completing all the jewelry 17:04
18 that night at length, and I know it is intense and 17:02	18 that needed to be completed before the show the 17:04
19 emotional, but if you'll bear with me, I want to 17:02	19 following day that Raquel was doing, her first -- 17:04
20 just revisit some of the key events of that night. 17:02	20 her first bead show. 17:04
21 A. Uh-huh. 17:02	21 Q. Do you remember where the bead show was? 17:04
22 Q. I'm going to try to do through them in a 17:02	22 A. Either -- I don't specifically -- I mean, 17:04
23 little more chronological order. 17:02	23 either in the arts district or maybe it was 17:04
24 A. Uh-huh. 17:02	24 downtown. Somewhere... 17:04
25 Q. You can put Exhibit 2 to the side. 17:02	25 Q. Somewhere in L.A.? 17:04
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Vague/Ambig.

F/A, SP, Lack of Pers. Know.	1	A. Somewhere in L.A.	17:04	1	that there was -- it was -- there had been, like,	17:06	F/A, SP, Lack of Pers. Know.
	2	Q. And at what point did you see Ms. Heard	17:04	2	arguments, fighting, whatever, I don't know	17:06	
	3	that evening?	17:04	3	specifics to any of it going on and, you know, he	17:06	
	4	A. I don't specifically remember the time,	17:04	4	hadn't been sleeping -- they hadn't seen each other	17:06	
	5	but soon after I arrived.	17:04	5	in a while, right? So I could only assume that they	17:06	
	6	Q. Was she helping you and Ms. Pennington	17:04	6	were having trouble in their marriage.	17:06	
	7	with the beading?	17:04	7	BY MS. BROOK:	17:06	
	8	A. She was -- yeah, she was helping doing	17:04	8	Q. How did you find out that Mr. Depp had	17:06	
	9	actually all the calig- -- the writing for the	17:04	9	arrived at the premises?	17:06	
	10	signs, for the descriptions of things. More	17:05	10	A. Well, I just assumed when she left that he	17:06	
	11	calligraphic style.	17:05	11	had arrived pretty soon before that.	17:06	
F/A, SP, Lack of Pers. Know.	12	Q. At any point was Mr. -- was Mr. Depp	17:05	12	Q. So let me try to put it differently.	17:06	F/A, SP, Lack of Pers. Know.
	13	helping you guys with the beading project, so to	17:05	13	A. Uh-huh.	17:07	
	14	speak?	17:05	14	Q. You, Ms. Heard, Ms. Pennington, Mr. Drew,	17:07	
	15	A. No.	17:05	15	you are hanging out in Penthouse 5 helping	17:07	
	16	Q. But at some point Mr. Depp arrived at the	17:05	16	Ms. Pennington get ready for her show, correct?	17:07	
	17	penthouses, correct?	17:05	17	What happens next?	17:07	
	18	A. Yes.	17:05	18	A. At some point, as I mentioned -- at some	17:07	
	19	Q. And I know that you have testified that	17:05	19	point Amber went upstairs and changed and that might	17:07	
	20	it's difficult to remember the specifics of the	17:05	20	have been -- that might have been when we were,	17:07	
	21	timing, but if you arrived around the afternoon, I	17:05	21	like, "Oh, you know, you look like" -- "What are you	17:07	
	22	believe your testimony was that Mr. Depp got there	17:05	22	getting ready for?" And maybe that was when we	17:07	
H, L	23	sometime early evening, evening?	17:05	23	found out that he was coming.	17:07	F/A, SP, Lack of Pers. Know., H
	24	A. Correct.	17:05	24	And then at whatever point it was that, I	17:07	
	25	Q. Did you know that Mr. Depp was arriving	17:05	25	guess, he arrived, she left. And there was a	17:07	
			Page 262			Page 264	
	1	before he got there?	17:05	1	conversation, you know, that Raquel either said, you	17:07	
	2	A. Yeah. There was conversation that he was	17:05	2	know, I'll -- "I'm here if you need me." Or, you	17:07	
	3	coming, yes.	17:05	3	know, it -- it felt like there was -- that there	17:07	
	4	Q. And what was the nature of that	17:05	4	could be a situation where Raquel was going to be	17:07	
	5	conversation?	17:05	5	needed to come in to be supportive for -- to Amber.	17:07	
	6	A. Nature of the conversation was he was	17:05	6	So -- yeah, so, then, Amber left and then	17:07	
	7	going to come by to pick up clothes to -- because he	17:05	7	sometime after I think there was -- you know, there	17:07	
	8	was leaving to go on tour. He hadn't been by in a	17:05	8	could have been a text received or some way Raquel	17:08	
	9	while, they hadn't seen each other in a while, so	17:05	9	was notified or felt like she was -- I think there	17:08	
	10	they were going to have a moment together to catch	17:05	10	was a text. Pretty sure. But I don't remember	17:08	O
	11	up and chat.	17:05	11	specifically. But either way, it was very clear	17:08	
	12	Q. "They" being Mr. Depp and Ms. Heard,	17:05	12	that Raquel needed -- felt called to go to see what	17:08	
	13	correct?	17:05	13	was going on over there and to be supportive to	17:08	
	14	A. Correct.	17:05	14	Amber.	17:08	
	15	Q. And did you have any sense that that might	17:06	15	MS. VASQUEZ: Objection. Hearsay. Move	17:08	
	16	include a difficult conversation?	17:06	16	to strike everything with regards to what Raquel	17:08	
	17	MS. VASQUEZ: Objection. Leading.	17:06	17	felt. The witness is testifying -- it's hearsay.	17:08	
	18	MS. BROOK: I'll withdraw the question.	17:06	18	And I'm going to move to strike everything	17:08	
	19	BY MS. BROOK:	17:06	19	about what Raquel felt, whatever Raquel needed to be	17:08	
	20	Q. Did you have any concerns about how their	17:06	20	quote "supportive for Amber."	17:08	
	21	communication was going to go?	17:06	21	BY MS. BROOK:	17:08	F/A, SP, Lack of Pers. Know., H
	22	MS. VASQUEZ: Objection. Leading as to	17:06	22	Q. So you testified that she left, I assume	17:08	
	23	"concerns."	17:06	23	you meant Ms. Heard left?	17:08	
	24	THE WITNESS: I could feel that there was	17:06	24	A. Ms. Heard left.	17:08	
	25	tension and there had been -- what I could tell was	17:06	25	Q. And you testified that somehow -- and that	17:08	
			Page 263			Page 265	

F/A, SP, Lack of Pers. Know., H, L	1	Raquel offered some words of support, correct?	17:08	1	A. No. Not that I can remember.	17:10	F/A, SP, Lack of Pers. Know.
	2	A. Correct.	17:08	2	Q. So Ms. Pennington leaves; what happened	17:10	
	3	Q. And you testified -- and what was your	17:08	3	next?	17:10	
	4	understanding of why Ms. Pennington was offering	17:08	4	A. She leaves and, again, pretty soon after -	17:10	
	5	words of support to Ms. Heard?	17:09	5	I don't know the time - was when we started to hear	17:11	
	6	A. My understanding was that they had been	17:09	6	the -- kind of loud noises and then Josh gets up,	17:11	
	7	fighting and that perhaps, you know -- perhaps -- I	17:09	7	he's peeping out the door and pacing and, then, the	17:11	
	8	mean, I guess my understanding was that, perhaps, it	17:09	8	door burst open, and there's Johnny Depp.	17:11	
	9	could get out of hand in some way, so that she was	17:09	9	Q. So just to clarify, were you present for	17:11	
	10	going to need to support -- she could have -- might	17:09	10	any conversation between Ms. Depp [verbatim] and	17:11	
	11	have been needed to support her -- you know, Amber.	17:09	11	Ms. Heard that evening?	17:11	
	12	Q. And when you said "they had been	17:09	12	A. Any conversation at all?	17:11	
	13	fighting," who are you referring to?	17:09	13	Q. Well, the conversation that took -- that	17:11	
	14	A. To Johnny and Amber.	17:09	14	took place during the period of time that	17:11	
	15	Q. And when you say that she thought she	17:09	15	Ms. Pennington left?	17:11	
	16	might need to offer some support, who is the "she"?	17:09	16	A. No.	17:11	
	17	A. It was clear that Raquel was -- she was --	17:09	17	Q. And so going back to what you just said,	17:11	
	18	she was putting herself in the role of, like, "I got	17:09	18	you said there was some -- I don't have the exact	17:11	
	19	you. I'll be there. You know, if you need me."	17:09	19	word in front of me, let me get it. [Reading	17:11	
F/A, SP, Lack of Pers. Know., H, L	20	MS. VASQUEZ: Objection. Move to strike	17:09	20	realtime monitor];	17:11	F/A, SP, Lack of Pers. Know.
	21	that answer as nonresponsive.	17:09	21	"We started to hear kind of a loud	17:11	
	22	BY MS. BROOK:	17:09	22	noises."	17:11	
	23	Q. So at some point, you become aware that	17:09	23	Talking about the loud noises, what did	17:11	
	24	Ms. Pennington feels like she needs to go check on	17:09	24	you hear?	17:11	
F/A, SP, Lack of Pers. Know.	25	Ms. Heard, correct?	17:10	25	A. Yeah. Just screaming, yelling, doors	17:11	F/A, SP, Lack of Pers. Know.
			Page 266			Page 268	
F/A, SP, Lack of Pers. Know.	1	MS. VASQUEZ: Objection. Leading.	17:10	1	slamming, commotion.	17:11	F/A, SP, Lack of Pers. Know.
	2	THE WITNESS: Correct.	17:10	2	Q. Anything else you can remember?	17:11	
	3	BY MS. BROOK:	17:10	3	A. No.	17:11	
	4	Q. How did you become aware of that?	17:10	4	Q. Could you tell whether the screaming and	17:11	
	5	A. I don't remember the specifics.	17:10	5	the yelling was a male voice or a female voice?	17:12	
	6	Q. What was your understanding in that moment	17:10	6	A. From what I could remember, a male.	17:12	
	7	of why Ms. Pennington needed to go check on	17:10	7	Q. And could you tell where the screaming and	17:12	
	8	Ms. Heard?	17:10	8	the yelling was coming from?	17:12	
	9	MS. VASQUEZ: Objection. Leading.	17:10	9	A. It felt like it was coming -- started	17:12	
	10	Assumes facts not in evidence.	17:10	10	farther down the hallway and then it was coming,	17:12	
	11	BY MS. BROOK:	17:10	11	like, closer. So essentially, it -- I mean, I don't	17:12	
	12	Q. What was --	17:10	12	know, but it could have been the hallway.	17:12	
	13	MS. BROOK: The witness testified that	17:10	13	Q. And so after you start hearing the	17:12	
	14	Ms. Pennington felt like she needed to go check on	17:10	14	screaming and the yelling and the door slamming and	17:12	
	15	Ms. Heard, but I'll rephrase.	17:10	15	the commotion, you testified that Mr. Drew got up	17:12	
	16	BY MS. BROOK:	17:10	16	and went to the door?	17:12	
F/A, SP, Lack of Pers. Know.	17	Q. What is your understanding of why	17:10	17	A. Uh-huh. Yeah.	17:12	F/A, SP, Lack of Pers. Know.
	18	Ms. Pennington left the apartment, the penthouse	17:10	18	Q. And what did Mr. Drew do?	17:12	
	19	where you guys were working, on her jewelry project?	17:10	19	A. He was kind of pacing by the door. And	17:12	
	20	A. My impression was that there was some sort	17:10	20	looking through the peephole.	17:12	
	21	of danger that she felt like she needed to support	17:10	21	Q. And what happened next?	17:12	
	22	Amber with to -- yeah, to be -- to be -- to be	17:10	22	A. And then the door, like, burst open and	17:12	
	23	there.	17:10	23	Johnny came charging in and screamed, again, holding	17:12	
	24	Q. And did you have any sense at that time of	17:10	24	the magnum size bottle of wine, you know, flailing	17:13	
	25	what the source of the danger was?	17:10	25	it around, looked intoxicated, kind of stumbling,	17:13	
			Page 267			Page 269	

Impr. Char. Evid	<p>1 and screamed, "Get your bitch out of here" as he ran 17:13</p> <p>2 in my direction. 17:13</p> <p>3 And I was scared. It was very -- it was 17:13</p> <p>4 very frightening, and I -- you know, just scary and 17:13</p> <p>5 unexpected. So I just darted out past him and ran 17:13</p> <p>6 up towards the pool, gym area, and hid there. 17:13</p> <p>7 Q. Prior to the night of May 21, 2016, had a 17:13</p> <p>8 man ever charged at you holding a magnum bottle of 17:13</p> <p>9 wine, screaming profanities? 17:13</p> <p>10 A. No. 17:13</p> <p>11 MS. VASQUEZ: Objection. 17:13</p> <p>12 BY MS. BROOK: 17:13</p>	<p>1 to leave that area until, like, I was clear that 17:15</p> <p>2 there was -- that I wasn't going to be attacked. 17:15</p> <p>3 Q. And at some point did you leave the area? 17:15</p> <p>4 A. Yes. 17:16</p> <p>5 Q. And what prompted you to leave the area? 17:16</p> <p>6 A. A text with Raquel just telling her to 17:16</p> <p>7 come to her and Josh's apartment. 17:16</p> <p>8 Q. And did you do as Ms. Pennington said and 17:16</p> <p>9 go to her and Josh's apartment? 17:16</p> <p>10 A. Yes. 17:16</p> <p>11 Q. And did you see anyone on your way down 17:16</p> <p>12 from the communal exercise area to their apartment? 17:16</p> <p>13 A. Not that I remember, no. 17:16</p> <p>14 Q. I understand it's a long time ago. 17:16</p>	F/A, SP, Lack of Pers. Know.
Impr. Char. Evid	<p>13 Q. And what was your reaction to this event 17:13</p> <p>14 when it happened on May 21, 2016? 17:13</p> <p>15 A. Fear. 17:13</p> <p>16 Q. Besides the screaming and the door 17:14</p> <p>17 slamming and the wine waving, do you recall anything 17:14</p> <p>18 else about Mr. Depp's actions that evening, during 17:14</p> <p>19 that moment, I guess I should say? 17:14</p> <p>20 A. It was erratic -- I would describe it as 17:14</p> <p>21 erratic behavior. 17:14</p> <p>22 Q. Was Mr. -- was anyone else with Mr. Depp 17:14</p> <p>23 when he charged into Penthouse 5? 17:14</p> <p>24 A. Behind him were two men. 17:14</p> <p>25 Q. What about Ms. Heard? 17:14</p>	<p>15 Sitting here today, do you remember what 17:16</p> <p>16 you were thinking as you were sort of coming out of 17:16</p> <p>17 your hiding spot and walking towards the penthouses 17:16</p> <p>18 again? 17:16</p> <p>19 A. I think I -- I think the whole thing was 17:16</p> <p>20 just bizarre, like, really frightening and bizarre 17:16</p> <p>21 to me. I don't -- I don't specifically remember 17:16</p> <p>22 what I was thinking other than like "Holy shit, 17:16</p> <p>23 What the fuck just happened," you know? 17:16</p> <p>24 And "Is he gone?" Maybe I was thinking 17:16</p> <p>25 that. I don't remember specifically. 17:16</p>	F/A, SP, Lack of Pers. Know.
L	<p>1 A. No. 17:14</p> <p>2 Q. What about Ms. Pennington? 17:14</p> <p>3 A. No. 17:14</p> <p>4 Q. So you testified that after Mr. Depp burst 17:14</p> <p>5 into the apartment and started charging towards you, 17:14</p> <p>6 that you darted out and hid in, I believe, it's a 17:15</p> <p>7 communal exercise area; is that correct? 17:15</p> <p>8 A. Yeah. I darted out and I went up the 17:15</p> <p>9 stairs and hid somewhere over by there. 17:15</p> <p>10 Q. Why did you hide? 17:15</p> <p>11 A. Because I was scared. 17:15</p> <p>12 MS. VASQUEZ: Objection. Leading. 17:15</p> <p>13 BY MS. BROOK: 17:15</p>	<p>1 Q. And when you say "Is he gone," who is the 17:17</p> <p>2 "he" you are referring to there? 17:17</p> <p>3 A. Johnny. 17:17</p> <p>4 Q. When you got to Ms. Pennington's and 17:17</p> <p>5 Mr. Drew's penthouse, who did you see? Who was 17:17</p> <p>6 there? 17:17</p> <p>7 A. I don't remember who was specifically 17:17</p> <p>8 there when I first walked in. But throughout the 17:17</p> <p>9 time being in there, in that moment, definitely 17:17</p> <p>10 Amber, Raquel, and Josh, and maybe, like, just by 17:17</p> <p>11 peeping into the hallway, one of the police 17:17</p> <p>12 officers. 17:17</p> <p>13 Q. When you saw Ms. Heard after you came back 17:17</p> <p>14 down from your hiding spot and you are in Mr. Drew's 17:17</p> <p>15 and Ms. Pennington's apartment, how did she look? 17:17</p> <p>16 A. She looked frazzled and just completely 17:17</p> <p>17 dishevelled. Her hair was all over the place. She 17:17</p> <p>18 had a swollen face. It looked like she had been 17:18</p> <p>19 crying and -- yeah. 17:18</p> <p>20 Q. Do you think the swollen face was a result 17:18</p> <p>21 of her having been crying? 17:18</p> <p>22 A. No. 17:18</p> <p>23 Q. What do you think it was a result of? 17:18</p> <p>24 A. It looked like she had been, like, hit in 17:18</p> <p>25 some way. Like, it was definitely -- it was not 17:18</p>	F/A, SP, Lack of Pers. Know.
L	<p>14 Q. Sorry. Say it again. Why did you hide? 17:15</p> <p>15 A. Because I was scared. 17:15</p> <p>16 Q. What were you scared of? 17:15</p> <p>17 A. I just didn't know what he would do. I 17:15</p> <p>18 didn't -- I didn't -- I didn't know what he would 17:15</p> <p>19 do. 17:15</p> <p>20 Q. And the "he" there is who? 17:15</p> <p>21 A. Johnny. 17:15</p> <p>22 Q. What were you thinking when you were 17:15</p> <p>23 hiding in the communal exercise area? 17:15</p> <p>24 A. I don't remember. Just that I was -- I 17:15</p> <p>25 mean, I just remember being scared and not wanting 17:15</p>	<p>Page 270</p>	<p>Page 272</p>
	<p>Page 270</p>	<p>Page 273</p>	

F/A, SP, Lack of Pers. Know

1 from crying. She had markings on her face. 17:18
2 Q. And do you recall whether at that point in 17:18
3 time Ms. Heard told you anything about what had 17:18
4 happened between her and Mr. Depp? 17:18
5 A. Just that there was a phone -- just that 17:18
6 he had gotten really upset and was, you know, 17:18
7 intoxicated and was -- threw a phone at her, 17:18
8 Q. Were the marks that you saw on Ms. Heard's 17:18
9 face after you came down from your hiding spot 17:18
10 present when you had been hanging out with her 17:19
11 earlier in the day? 17:19
12 A. No. 17:19
13 Q. You testified earlier today that you 17:19
14 witnessed some -- I believe it was Mr. -- 17:19
15 Ms. Pennington or Mr. Drew take some photos of 17:19
16 Ms. Heard's face. 17:19
17 Do you remember that? 17:19
18 A. Yeah. 17:19
19 MS. BROOK: I'd like to mark what will be 17:19
20 Marz Exhibit 13. 17:19

21 (Deposition Exhibit 13 was marked for 17:19
22 identification and is attached hereto.) 17:19
23 BY MS. BROOK: 17:19

F/A, SP, Lack of Pers. Know

24 Q. Ms. Marz, as the court reporter hands you 17:19
25 Exhibit 13, I'll represent to you that these were 17:19
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Vague/Ambig.

1 some photos taken on the night of May 21, 2016. 17:19
2 I'll give you a chance to go through them. 17:19
3 Let me know when you have had an 17:19
4 opportunity. 17:19
5 A. [Witness reviews document]. 17:19
6 Uh-huh. Okay. 17:19

Vague/Ambig.

7 Q. So if you turn to the second photo in the 17:20
8 set? 17:20
9 A. [Witness complies]. 17:20
10 Uh-huh. 17:20
11 Q. It's a photograph of -- well, I guess, 17:20
12 I'll let you tell me. 17:20

Vague/Ambig.

13 Do you recognize the person in this 17:20
14 photograph? 17:20
15 A. Yes. 17:20
16 Q. Who is it? 17:20
17 A. Amber. 17:20
18 Q. And do you see any marks on her face in 17:20
19 this photograph? 17:20
20 A. Yes. 17:20
21 Q. And do these marks look like the marks 17:20
22 that you saw in person on her face on the evening of 17:20
23 March 21, 2016? 17:20
24 A. Yes. 17:20
25 Q. And just to clarify, these marks were not 17:20
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1 on her face when you saw Ms. Heard earlier that same 17:20
2 afternoon and were helping Ms. Pennington make 17:20
3 beads? 17:20
4 A. Correct. 17:20
5 Q. There are other photos in this set. Why 17:20
6 don't we turn back to the first one. Some broken 17:20
7 frames on a bed. Do you know what this picture is 17:20
8 of? 17:20
9 A. Yeah. I mean, this is Amber and Johnny's 17:20
10 bed and there's broken -- there's photographs on it. 17:20
11 Q. So I take it that you have seen Amber and 17:20
12 Johnny's bedroom before? 17:21
13 A. Yes. 17:21
14 Q. Did you see this particular scene, did you 17:21
15 see frames collected on their bed the night of 17:21
16 May 21, 2016? 17:21
17 A. No. 17:21
18 Q. Do you recall whether you went into 17:21
19 Mr. Depp's and Ms. Heard's bedroom that night? 17:21
20 A. No. 17:21

21 Q. "No" you don't recall? Or "No" you 17:21
22 didn't? 17:21
23 A. No. I don't recall. 17:21

24 Q. Okay. The next photo in the set is the 17:21
25 picture of Ms. Heard. Just after that, there is a 17:21
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1 photo -- you are with me -- of what appears to be a 17:21
2 hallway. 17:21
3 Are you with me? 17:21
4 A. Yes. 17:21
5 Q. Do you recognize what this is an image of? 17:21
6 A. Yes. 17:21
7 Q. What is it an image of? 17:21
8 A. It's the hallway between all the penthouse 17:21
9 apartments. 17:21
10 Q. So you have been on this hallway many 17:21
11 times? 17:21
12 A. Yes. 17:21
13 Q. Do you see the sort of red staining on the 17:21
14 right-hand corner of the page? 17:21
15 A. Yes. 17:21
16 Q. Do you recall seeing that red staining the 17:21
17 night of May 21, 2016? 17:21
18 A. Yes. 17:21
19 Q. And what was it? 17:21
20 A. It was wine. 17:21

21 MS. VASQUEZ: Objection. Calls for 17:21
22 speculation. 17:22
23 BY MS. BROOK: 17:22

24 Q. So you saw that staining on the night of 17:22
25 May 21, 2016? 17:22
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F/A, SP, Lack of Pers. Know.

F/A, SP, Lack of Pers. Know.

F/A, SP, Lack of Pers. Know.

1 A. Yes. 17:22
2 Q. Do you recall whether it was there when 17:22
3 you arrived in the afternoon? 17:22
4 A. I don't remember seeing it, no. 17:22
5 Q. So when was the first time you remember 17:22
6 seeing it? 17:22
7 A. I think when I came out of my hiding spot 17:22
8 and came down stairs, back into Raquel and Josh's 17:22
9 apartment. 17:22
10 Q. But you didn't see the wine get spilled? 17:22
11 A. Not this, no. 17:22
12 Q. You saw other wine get spilled? 17:22
13 A. I saw -- yeah, as he was -- when he came 17:22
14 in the apartment with -- when he was flailing the 17:22
15 wine. 17:22
16 Q. And the "he" there is? 17:22
17 A. Johnny. 17:22

18 Q. The next photo in the batch is what looks 17:22
19 to be a staircase. Do you recognize what this is a 17:22
20 picture of? 17:22
21 A. Yeah. It looks like a staircase and I 17:22
22 don't specifically -- I mean, it looks like it's the 17:22
23 one inside their apartment. 17:22
24 Q. I don't want you to speculate. 17:22
25 A. Yeah. I don't -- 17:22

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1 Q. So -- 17:23
2 A. I don't know specifically. But yes, it's 17:23
3 a staircase. 17:23
4 Q. So you don't recall exactly where this 17:23
5 staircase is? 17:23
6 A. Not specifically, no. 17:23
7 Q. Then we'll zoom on by it. 17:23
8 A. Okay. 17:23
9 Q. The next photo, which I believe - no. 17:23
10 There's two more - the next photo in this set is 17:23
11 what looks to me to sort of be a platform. 17:23
12 Do you see it? 17:23
13 A. Yes. 17:23
14 Q. Do you recognize this shot, what it is a 17:23
15 photo of? 17:23
16 A. No. 17:23
17 Q. Then you can zoom on by it. 17:23
18 The next photograph in Exhibit 13 is a 17:23
19 picture of a wine bottle and then what appears to be 17:23
20 some wine on the ground, next to it. 17:23
21 Do you see that? 17:23
22 A. Yes. 17:23
23 Q. Do you recognize what this is a photograph 17:23
24 of? I know you can see the things on the pages as 17:23
25 well as me and the members of the jury [verbatim] -- 17:23

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1 A. No. 17:23
2 Q. -- but do you recognize the space that you 17:23
3 are looking at? 17:23
4 A. No. 17:23
5 Q. Then you can move by it. 17:23

6 And then the last photo in this set 17:23
7 appears to be of some picture frames hanging on a 17:23
8 wall. 17:24
9 Do you see that? 17:24
10 A. Yes. 17:24

11 Q. Do you know where this is a photo of? 17:24
12 A. Do I know where this is? 17:24
13 Q. Have you seen this before? 17:24
14 A. I have seen the photo before. 17:24
15 Q. Where is the photo? 17:24
16 A. Hanging on a wall. 17:24
17 Q. In... 17:24

18 A. I think it's in Amber and Johnny's 17:24
19 apartment, I think. But, again, I don't remember if 17:24
20 it's in her studio -- I don't know. 17:24
21 Q. I don't want you to speculate. 17:24
22 A. Yeah. 17:24

23 Q. Do you recall seeing -- but do you recall 17:24
24 seeing this photo in one of the penthouses before? 17:24
25 A. Yes. 17:24

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1 Q. And when you saw it, was it broken? 17:24
2 A. No. 17:24
3 Q. Did you see it the night of May 21, 2016? 17:24
4 A. No. 17:24
5 Q. You can put that aside. 17:24
6 A. [Witness complies]. 17:24
7 Q. So going back to our timeline, we were 17:24
8 talking about you're in Ms. Pennington's and 17:24
9 Mr. Drew's apartment following the incident and you 17:24
10 were looking at Amber. You mentioned -- you 17:25
11 testified that you also saw Ms. Pennington and 17:25
12 Mr. Drew when you returned to their apartment, 17:25
13 correct? 17:25
14 A. Correct. 17:25

15 Q. And what, if anything, do you remember 17:25
16 about Ms. Pennington's state? 17:25
17 A. Also distraught, upset. 17:25

18 Q. Anything else? 17:25
19 A. That's all I remember. 17:25

20 Q. You had been friends with Ms. Pennington 17:25
21 for many years at that point, correct? 17:25
22 A. Correct. 17:25
23 Q. Had you ever seen her similarly 17:25
24 distraught? 17:25
25 A. Not similarly. But I have seen her sad. 17:25

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71 (Pages 278 - 281)

F/A, SP, Lack of Pers. Know., H	1 Q. But had you ever seen her have the same 17:25	1 in the situation that was going to, like, really be 17:28	F/A, SP, Lack of Pers. Know., H
	2 reaction that she had that evening? 17:25	2 grounded amongst, like, women that were sort of, 17:28	
	3 A. No. 17:25	3 like, frightened and sort of a little more frantic. 17:28	
	4 Q. What, if anything, did Ms. Pennington tell 17:25	4 He was very grounded and very, like, clear and I 17:28	
	5 you in that time period when you returned to her 17:25	5 remember, like, feeling safe with him. Like he 17:28	
	6 apartment about what happened between Ms. Heard -- 17:25	6 was -- it was, like, protection. 17:28	
	7 Ms. Heard and Mr. Depp that evening? 17:26		
F/A, SP, Lack of Pers. Know., H	8 MS. VASQUEZ: Objection. I'm sorry -- 17:26	7 Q. Anything else you remember about 17:28	F/A, SP, Lack of Pers. Know., H
	9 objection. Hearsay. 17:26	8 Mr. Drew's appearance in that time frame? 17:28	
	10 THE WITNESS: I remember her telling me 17:26	9 A. No. 17:28	
	11 that she came in, you know, they were fighting and 17:26	10 Q. And what, if anything, did Mr. Drew tell 17:28	
	12 that there was -- she got between the two of them. 17:26	11 you about what had transpired between Mr. Depp and 17:28	
	13 And that something, like, ignited within her that 17:26	12 Ms. Heard that evening? 17:28	
	14 was just, like, an energy that was like -- I don't 17:26	13 MS. VASQUEZ: Objection. Calls for 17:28	
F/A, SP, Lack of Pers. Know., H	15 know. Just something that she -- it seemed, like, 17:26	14 hearsay. 17:28	F/A, SP, Lack of Pers. Know., H
	16 she was -- it was, like, an energy of, like, 17:26	15 THE WITNESS: I didn't remember him saying 17:29	
	17 [witness indicates], you know, fight or flight, you 17:26	16 anything specific to me. 17:29	
	18 know. You are just going to, like, step in and, 17:26	17 BY MS. BROOK: 17:29	
	19 like, be strong for your friend in this moment. 17:26	18 Q. At that point in time, after Mr. Depp has 17:29	
	20 So it was -- yeah. I just remember her 17:26	19 charged into the penthouse you were in, after you 17:29	
	21 talking just -- there was conversation around that. 17:26	20 fled, after you returned, and had regrouped of sorts 17:29	
F/A, SP, Lack of Pers. Know., H	22 Like her willingness to get in the middle of a fight 17:26	21 with Ms. Heard, Ms. Pennington, and Mr. Drew, what 17:29	F/A, SP, Lack of Pers. Know., H, UN, Cumulative
	23 with her best friend, and I remember thinking, like, 17:26	22 was your understanding of what had transpired 17:29	
	24 "Wow, that's -- that's intense." 17:26	23 between Mr. Depp and Ms. Heard that evening? 17:29	
	25 ///	24 MS. VASQUEZ: Objection. Calls for 17:29	
	Page 282	25 hearsay testimony. 17:29	
		Page 284	
	1 BY MS. BROOK: 17:26	1 BY MS. BROOK: 17:29	
F/A, SP, Lack of Pers. Know., H	2 Q. So you testified this a little bit at the 17:26	2 Q. To clarify, as I asked, I want your 17:29	F/A, SP, Lack of Pers. Know., H, UN, Cumulative
	3 end there. But what was your reaction to what 17:27	3 understanding. 17:29	
	4 Ms. Pennington told you in that moment? 17:27	4 A. Right. 17:29	
	5 A. I think the whole time I was just kind of, 17:27	5 Yeah. My understanding was that there 17:29	
	6 like, in shock about the whole situation. 17:27	6 was -- there was fighting and it was around a 17:29	
	7 And it was upsetting and frightening. 17:27	7 certain situation with Johnny thinking that, you 17:29	
	8 Q. Were you concerned about Ms. Pennington? 17:27	8 know, they had -- someone had pooped in the bed and 17:29	
F/A, SP, Lack of Pers. Know., H	9 A. In that moment, she was -- I mean, she 17:27	9 that, you know, it was not true, basically. That 17:29	F/A, SP, Lack of Pers. Know., H, UN, Cumulative
	10 wasn't in that moment, but I was concerned -- yeah, 17:27	10 like someone had pooped in the bed and left it there 17:29	
	11 I think I was probably concerned about her state a 17:27	11 for him. That the dog must have gone to the 17:29	
	12 little bit. Just, you know, caring -- I care about 17:27	12 bathroom and Johnny had, like -- there was some 17:30	
	13 her. So it was visibly upsetting, I think, all 17:27	13 situation about pooping in the bed. And dog -- I 17:30	
	14 around. 17:27	14 have no idea. 17:30	
	15 Q. Is there anything else you remember about 17:27	15 And then i.O. at some point was called to 17:30	
F/A, SP, Lack of Pers. Know., H	16 your interactions with Ms. Pennington during that 17:27	16 like, you know, support in that moment. And then 17:30	F/A, SP, Lack of Pers. Know., H, UN, Cumulative
	17 specific time block? 17:27	17 from there, I think whatever happened was i.O. ended 17:30	
	18 A. No. 17:27	18 up calling the police because she was -- she could 17:30	
	19 Q. So you also testified that you saw 17:27	19 hear things were getting out of hand. And then at 17:30	
	20 Mr. Drew in his and Ms. Pennington's penthouse. 17:27	20 some point Raquel came in and kind of got between 17:30	
	21 What, if anything, do you remember about Mr. Drew's 17:28	21 and, you know, that was basically what I remember. 17:30	
	22 state? 17:28	22 BY MS. BROOK: 17:30	
F/A, SP, Lack of Pers. Know., H	23 A. I just remember him being just a grounding 17:28	23 Q. And I just want to clarify for the record. 17:30	F/A, SP, Lack of Pers. Know., H, UN, Cumulative
	24 energy. Just trying to be supportive to Amber and 17:28	24 You said "She could hear things were 17:30	
	25 Raquel and just really trying to be, like, the man 17:28	25 getting out of hand," who are you referring to in 17:30	
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F/A, SP, Lack of Pers. Know., H, UN, Cumulative	1	that instance?	17:30	1	witness any damage in that apartment?	17:33	F/A, SP, Lack of Pers. Know.
	2	A. So I'm assuming that i.O. called the cops	17:30	2	A. No.	17:33	
	3	because she was trying to protect Amber or trying to	17:30	3	MS. VASQUEZ: Objection. Leading.	17:33	
	4	like, make sure that no one was hurt and -- yeah.	17:30	4	BY MS. BROOK:	17:33	
	5	MS. VASQUEZ: I'm going to move to strike	17:30	5	Q. When you were in the apartment that	17:33	
	6	everything after -- or I'm going to move to strike	17:30	6	belongs -- or that Mr. Depp and Ms. Heard were	17:33	
	7	that entire answer as nonresponsive to the question.	17:31	7	living in at the time, the one you just referred to	17:33	
	8	And it assumes facts not in evidence. Speculation	17:31	8	as, I believe, the main apartment, did you witness	17:33	
	9	and hearsay.	17:31	9	any damage in that apartment?	17:33	
	10	BY MS. BROOK:	17:31	10	A. I really -- I can't remember.	17:33	
F/A, SP, Lack of Pers. Know., H, UN, Cumulative	11	Q. When you say i.O., are you referring to	17:31	11	Q. Anything broken?	17:33	
	12	i.O. Tillett?	17:31	12	A. Slightly remember a statue, like, a little	17:33	
	13	A. Yes.	17:31	13	thing -- I slightly remember there was, like, things	17:33	
	14	Q. And are you friends with i.O. Tillett?	17:31	14	that were picked up before I got there, but I don't	17:33	
	15	A. Not really. I know her acquaintance -- I	17:31	15	remember specifically.	17:33	
	16	mean I know her.	17:31	16	Q. You have mentioned that you saw two	17:33	
	17	Q. Met on a couple of occasions?	17:31	17	different sets of police officers sort of come in	17:33	
	18	A. Yeah.	17:31	18	and out of the space, correct?	17:33	
	19	Q. Sitting here today, could you recall the	17:31	19	A. Yeah. I was aware. Uh-huh.	17:33	
	20	last time you spoke with her?	17:31	20	Q. Sorry. You are aware of them, you might	17:33	
F/A, SP, Lack of Pers. Know.	21	A. Yeah.	17:31	21	not have seen all of them?	17:33	
	22	Q. When was it?	17:31	22	A. Correct.	17:33	
	23	A. I mean, I don't remember specific dates.	17:31	23	Q. All right. So I take it that you didn't	17:33	
	24	I just remember -- I can remember the thread, but I	17:31	24	do a walkthrough with any of them, correct?	17:33	
	25	don't -- it's been -- it's been some time.	17:31	25	A. Correct.	17:34	
			Page 286			Page 288	
	1	Q. So you have regrouped with Ms. Heard,	17:31	1	Q. Did you talk to any of them?	17:34	
	2	Ms. Pennington, and Mr. Drew in the penthouse that	17:31	2	A. No.	17:34	
	3	belongs to Ms. Pennington or Mr. Drew or where they	17:31	3	Q. Were you asked by anyone to talk to any	17:34	
	4	were living at the time; what happened next?	17:32	4	one of them?	17:34	
	5	A. I don't remember the sequence of events.	17:32	5	A. No.	17:34	
	6	I just remember at some point going over to like --	17:32	6	Q. Did you overhear any conversations between	17:34	
	7	I don't remember when, but at some point, going over	17:32	7	anyone else and the police officers --	17:34	
	8	to Amber and Johnny's main unit. And I just -- from	17:32	8	A. No.	17:34	
	9	what I can remember, I remember sitting on the	17:32	9	Q. -- in enough loudness in order to recount	17:34	
F/A, SP, Lack of Pers. Know.	10	couch.	17:32	10	what you heard?	17:34	
	11	I remember -- I sort of remember that we	17:32	11	A. No.	17:34	
	12	were -- none of us had eaten and I feel like	17:32	12	Q. Sitting here today, do you know who the	17:34	
	13	pizza -- we might have ordered food or something --	17:32	13	police officers even spoke to?	17:34	
	14	we were, like, all frantic and hungry. So I barely	17:32	14	A. No.	17:34	
	15	remember, like, something about getting food or	17:32	15	Q. I take it that by the time you came down	17:34	
	16	something. And then the police -- two separate	17:32	16	from your hiding spot, Mr. Depp was gone?	17:34	
	17	police came in for a short time.	17:32	17	A. Yes.	17:34	
	18	And then again, I don't remember if -- I	17:32	18	Q. Did you see Mr. Depp any more that	17:34	
	19	think we were all exhausted, or at least I was, and	17:32	19	evening?	17:34	
	20	we were waking up very early the next day for this	17:32	20	A. No.	17:34	
F/A, SP, Lack of Pers. Know.	21	bead show, at least Raquel and I.	17:32	21	Q. Did you have any confirmation that he	17:34	
	22	So I don't remember if I stayed -- where I	17:32	22	wouldn't be returning?	17:34	
	23	stayed that night.	17:32	23	A. Not confirmation.	17:34	
	24	Q. And before you left Ms. Drew -- sorry --	17:32	24	Q. What did you know?	17:35	
	25	Mr. Drew and Ms. Pennington's apartment, did you	17:33	25	A. I knew that he had left. But I remember	17:35	
			Page 287			Page 289	

F/A, SP, Lack of Pers. Know., H	1 feeling scared about whether or not he might return. 17:35	1 Prior to May 21, 2016, do you recall one 17:37	F/A, SP, Lack of Pers. Know., H
	2 Q. Do you remember talking to anyone about 17:35	2 way or the other whether or not you had been told 17:37	
	3 that? 17:35	3 that Mr. Depp had been violently with Ms. Heard? 17:37	
	4 MS. VASQUEZ: Objection. Calls for 17:35	4 MS. VASQUEZ: Objection. Assumes facts 17:37	
	5 hearsay. 17:35	5 not in evidence. 17:37	
	6 THE WITNESS: Not specific -- not that I 17:35	6 THE WITNESS: I remember hearing there 17:37	F/A, SP, Lack of Pers. Know., H
	7 can specifically recount. 17:35	7 was -- you know, I don't remember if there was 17:37	
	8 BY MS. BROOK: 17:35	8 actual physical stuff that I was -- that I heard 17:37	
F/A, SP, Lack of Pers. Know., H	9 Q. Sitting here today, is there anything else 17:35	9 about. But I remember hearing about just a very 17:37	
	10 you remember about that night, May 21, 2016, that we 17:35	10 tumultuous dynamic where, you know -- you know -- 17:37	
	11 haven't talked about? 17:35	11 and I don't remember if it was before. Like, I 17:37	
	12 A. I think I -- I think one thing that I do 17:35	12 remember hearing him showing up really late to her 17:37	
	13 remember is that Amber was not wanting to be, like, 17:35	13 birthday and her being upset about that. I just 17:37	
	14 forth-telling with the police officers about what 17:35	14 remember that they -- yeah, that there was problems. 17:37	
	15 had happened. 17:35	15 But I don't remember if I heard about 17:38	
	16 Q. And -- 17:35	16 physical stuff before that date or if I heard about 17:38	
	17 MS. VASQUEZ: Objection. Calls for -- 17:35	17 it after that date. 17:38	
	18 that's hearsay. 17:35	18 MS. VASQUEZ: Move to strike the entire 17:38	
	19 BY MS. BROOK: 17:35	19 answer as speculation and nonresponsive. 17:38	
F/A, SP, Lack of Pers. Know., H	20 Q. And what was your understanding of why 17:35	20 BY MS. BROOK: 17:38	
	21 Ms. Heard didn't want to be forth-telling with the 17:35	21 Q. But at some point, you did hear about 17:38	F/A, SP, Lack of Pers. Know., H
	22 police officers? 17:35	22 Mr. Depp being physically violent with Ms. Heard? 17:38	
	23 MS. VASQUEZ: Objection. Calls for 17:35	23 MS. VASQUEZ: Objection. Calls for -- or 17:38	
	24 speculation. Calls for hearsay. 17:35	24 excuse me, assumes facts not in evidence. 17:38	
F/A, SP, Lack of Pers. Know., H	25 THE WITNESS: From my understanding, it 17:36	25 THE WITNESS: Correct. 17:38	F/A, SP, Lack of Pers. Know., H
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F/A, SP, Lack of Pers. Know., H	1 was that, you know, she -- I mean, I don't know how 17:36	1 BY MS. BROOK: 17:38	
	2 these things work, but I guess, right? That, you 17:36	2 Q. And do you remember who told you that or 17:38	F/A, SP, Lack of Pers. Know., H, Vague/Ambig.
	3 know, by telling the police officers that, you know, 17:36	3 which -- if it was multiple people, which people 17:38	
	4 this was Johnny Depp, and there was an altercation, 17:36	4 told you that? 17:38	
	5 and that there was, you know, any kind of abuse 17:36	5 MS. VASQUEZ: Objection. Calls for 17:38	
	6 happening; that would mean she was coming out with 17:36	6 hearsay. 17:38	
	7 that information publicly. 17:36	7 THE WITNESS: I remember hearing it from 17:38	F/A, SP, Lack of Pers. Know., H, Vague/Ambig.
	8 And I think, again, she was sort of not 17:36	8 Raquel. 17:38	
	9 sure what to do and wanted to take a step back to, 17:36	9 BY MS. BROOK: 17:38	
	10 like, think about how she was going to report this 17:36	10 Q. Anyone else? 17:38	
	11 or talk to her -- whoever she wanted to talk to 17:36	11 A. Not that I remember. 17:38	
	12 about it, to do it in a way that felt -- yeah, felt, 17:36	12 Q. What about the night of May 21, 2016, do 17:38	
	13 like, I guess -- I don't know. But there was a 17:36	13 you remember anyone else talking about it? 17:38	
	14 feeling like she wasn't -- I remember there was a 17:36	14 MS. VASQUEZ: Objection. Calls for 17:38	
	15 feeling, like, she didn't want to, like, disclose. 17:36	15 hearsay. 17:38	
	16 MS. VASQUEZ: I'm going to strike 17:36	16 THE WITNESS: No. 17:38	
	17 Ms. Marz's answer as pure speculation. 17:36	17 BY MS. BROOK: 17:38	
	18 BY MS. BROOK: 17:36	18 Q. You testified earlier today that, quote, 17:38	F/A, SP, Lack of Pers. Know., H, Vague/Ambig.
	19 Q. Ask did you agree with that decision? 17:36	19 "There are some things that I really remember and 17:38	
	20 A. I didn't have any -- I didn't have a 17:36	20 some things that are a little shady," end quote. 17:38	
	21 preference -- I didn't have an opinion on it. 17:37	21 Which bucket did the marks that you saw on 17:38	
F/A, SP, Lack of Pers. Know., H	22 Q. You have been asked a lot today about when 17:37	22 Ms. Heard's face on the evening of May 21, 2016 fall 17:38	
	23 you first may have heard that Mr. Depp was violent 17:37	23 into? 17:39	
	24 with Ms. Heard. I just want to get your best 17:37	24 MS. VASQUEZ: Objection. Assumes facts 17:39	
	25 recollection. 17:37	25 not in evidence. 17:39	
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Vague/Ambig.

1	BY MS. BROOK:	17:39	1	witness, Ms. Goldstein;	17:48
2	Q. The things that were a little shady or the	17:39	2	And from whatever date that is, there will	17:48
3	things that you really remember?	17:39	3	be 30 days for errata;	17:48
4	A. That I really remember.	17:39	4	And the parties will come to an agreement	17:48
5	MS. BROOK: I'm going to take a quick	17:39	5	over the next couple of days for the number of days	17:48
6	break off the record.	17:39	6	for confidentiality designations and in the meantime	17:48
7	THE WITNESS: Can -- I have to go to the	17:39	7	agree to keep it confidential.	17:48
8	bathroom.	17:39	8	MS. VASQUEZ: The -- Mr. Depp will not	17:48
9	THE VIDEOGRAPHER: Going off the record at	17:39	9	actually agree to the confidential in the meantime,	17:48
10	5:39 p.m.	17:39	10	but we will designate the deposition transcript	17:48
11	(Brief recess.)	17:39	11	confidential within ten days.	17:48
12	THE VIDEOGRAPHER: Going back on the	17:46	12	Or if counsel for Ms. Heard wants to	17:48
13	record at 5:47 p.m.	17:46	13	designate the deposition transcript confidential,	17:49
14	BY MS. BROOK:	17:46	14	she can do so within ten days. But we're not going	17:49
15	Q. Ms. Marz, you understand you are still	17:46	15	to agree to mark the entire deposition transcript as	17:49
16	under oath?	17:46	16	confidential at this time.	17:49
17	A. Yes.	17:46	17	MS. BROOK: That's fine.	17:49
18	Q. Earlier today you testified that Ms. Heard	17:46	18	MS. VASQUEZ: So stipulated.	17:49
19	at some point started dating Elon Musk.	17:46	19	THE REPORTER: And -- so where will the	17:49
20	Do you remember that?	17:46	20	original be sent? Are we as per Code or..	17:49
21	A. Yes.	17:46	21	MS. VASQUEZ: The original will go to	17:49
22	Q. Do you know if that was when Ms. Heard was	17:46	22	Mr. Depp's attorney.	17:49
23	still married to Mr. Depp?	17:46	23	THE REPORTER: Okay.	17:49
24	A. I do not know.	17:46	24	MS. VASQUEZ: To my office, at my	17:49
25	Q. Do you think that if one spouse cheats on	17:46	25	attention, please.	17:49
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1	the other, the spouse has the right to become	17:47	1	And I will then send it to Ms. Goldstein	17:49
2	physically violent with them?	17:47	2	for the witness to review and execute.	17:49
3	A. No.	17:47	3	And the original will be -- will be	17:49
4	MS. BROOK: No further questions.	17:47	4	maintained by my office and a copy can be used in	17:49
5	The stipulation -- can I enter the	17:47	5	lieu of the original, if it's lost.	17:49
6	stipulation?	17:47	6	MS. BROOK: Sounds good.	17:49
7	MS. VASQUEZ: Yeah. Absolutely.	17:47	7	MS. VASQUEZ: Sounds- -- so stipulated.	17:49
8	MS. BROOK: Great. So you want to do your	17:47	8	(Whereupon, at 5:49 p.m., the deposition	
9	thing?	17:47	9	of ELIZABETH RAE MARZ was adjourned.)	
10	THE VIDEOGRAPHER: Do you want me to	17:47	10	--- oOo ---	
11	conclude the video?	17:47	11		
12	MS. BROOK: Why don't you conclude the	17:47	12		
13	video.	17:47	13		
14	THE VIDEOGRAPHER: Okay. We're off the	17:47	14		
15	video record at 5:48 p.m., and this concludes	17:47	15		
16	today's testimony given by Elizabeth Marz. The	17:47	16		
17	total number of media used was four, and it will be	17:47	17		
18	retained by Veritext Legal Solutions.	17:47	18		
19	Thank you.	17:47	19		
20	MS. BROOK: Thank you. And we had a	17:47	20		
21	stipulation that I am forgetting.	17:47	21		
22	(Discussion held off the record.)	17:47	22		
23	MS. BROOK: All right. So, for the	17:48	23		
24	record, counsel for Mr. Depp will provide the	17:48	24		
25	certified copy of the transcript to counsel for the	17:48	25		
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1 STATE OF CALIFORNIA)	
2 COUNTY OF LOS ANGELES) SS.	
3	
4	
5 I, ELIZABETH RAE MARZ, hereby certify	
6 under penalty of perjury under the laws of the State	
7 of California that the foregoing is true and	
8 correct.	
9 Executed this _____ day of	
10 _____, 2019, at _____,	
11 California.	
12	
13	
14 _____	
15 ELIZABETH RAE MARZ	
16	
17	
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22	
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24	
25	Page 298
1 STATE OF CALIFORNIA)	
2 COUNTY OF LOS ANGELES) SS.	
3 I, Dayna Hester, C.S.R. No. 9970, in	
4 and for the State of California, do hereby certify:	
5 That, prior to being examined, the witness	
6 named in the foregoing deposition was by me duly	
7 sworn to testify to the truth, the whole truth, and	
8 nothing but the truth;	
9 That said deposition was taken down by me	
10 in shorthand at the time and place therein named and	
11 thereafter reduced to typewriting under my	
12 direction, and the same is a true, correct, and	
13 complete transcript of said proceedings;	
14 That if the foregoing pertains to the	
15 original transcript of a deposition in a Federal	
16 Case, before completion of the proceedings, review	
17 of the transcript { } was { } was not required;	
18 I further certify that I am not interested	
19 in the event of the action.	
20 Witness my hand this 2nd day of December,	
21 2019	
22 	
23	
24 Certified Shorthand Reporter	
25 for the State of California	Page 299