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Transcript of John C. Depp, II

Date: November 10, 2020

Case: Depp, II -v- Heard

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V I R G I N I A:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

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

----- x
Videotaped Deposition of JOHN C. DEPP, II
Reston, Virginia
Tuesday, November 10, 2020
10:40 a.m.
Volume 1

CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER

Job No. 328692
Pages 1 - 266
Reported by: Karen Young

1 Videotaped Deposition of JOHN C. DEPP, II,

2 held at the offices of:

3 CHARLSON BREDEHOFT COHEN & BROWN, P.C.

4 11260 Roger Bacon Drive

5 Suite 201

6 Reston, Virginia 20190

7 (703) 318-6800

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12 Pursuant to notice, before Karen Young,

13 Notary Public of the Commonwealth of Virginia.

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A P P E A R A N C E S

ON BEHALF OF JOHN C. DEPP, II:

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1 ON BEHALF OF AMBER LAURA HEARD:

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16 ALSO PRESENT:

17 Dustin Thomason, Videographer

18 Amber Laura Heard, by mobile videoconference

19 Leslie Hoff, Charlson Bredehoff Cohen & Brown, P.C.

20

21

22

1	BY MS. CHARLSON BREDEHOFT:	12:14:07
2	Q So -- so I just want to make sure I	12:14:07
3	understand this last -- this last answer.	12:14:09
4	MR. CHEW: You may answer this one	12:14:10
5	question.	12:14:11
6	BY MS. CHARLSON BREDEHOFT:	12:14:12
7	Q So none of the \$7 million that you paid	12:14:12
8	to Amber Heard --	12:14:17
9	A Uh-huh.	12:14:18
10	Q -- was because or as a result of her	12:14:19
11	alleging that you'd engaged in domestic abuse or	12:14:22
12	violence; is that correct?	12:14:25
13	MR. CHEW: And Mr. Depp, I would instruct	12:14:26
14	you not to answer that question to the extent it	12:14:28
15	requires you to divulge attorney-client privilege.	12:14:30
16	If you can answer it without disclosing any	12:14:33
17	communications with counsel, you can, but if you	12:14:35
18	can't, don't answer it.	12:14:37
19	THE WITNESS: May I hear the question	12:14:40
20	again?	12:14:42
21	MS. CHARLSON BREDEHOFT: Can you just	12:14:42
22	read it back?	12:14:44

1 THE REPORTER: Question: "So none of the 12:15:00
2 \$7 million that you paid to Amber Heard was because
3 or as a result of her alleging that you'd engaged
4 in domestic abuse or violence; is that correct?" 12:15:01
5 MR. CHEW: And same instruction. 12:15:01
6 THE WITNESS: None of the \$7 million that 12:15:04
7 she was awarded in the divorce had anything 12:15:07
8 whatsoever to do with any -- any of her claims, any 12:15:10
9 of that, no. 12:15:18
10 MS. CHARLSON BREDEHOFT: You can take 12:15:20
11 your break now. 12:15:21
12 MR. CHEW: Thank you. 12:15:22
13 THE VIDEOGRAPHER: We're going off the 12:15:23
14 record. The time is 12:15. 12:15:25
15 (Recessed at 12:15 p.m.) 12:15:28
16 (Reconvened at 1:32 p.m.) 12:15:28
17 THE VIDEOGRAPHER: We are back on the 13:31:54
18 record. The time is 13:32. 13:32:15
19 BY MS. CHARLSON BREDEHOFT: 13:32:17
20 Q Mr. Depp, while we were talking this 13:32:17
21 morning, you had indicated that Ms. Heard had 13:32:23
22 engaged in I believe you called it a campaign of 13:32:27

1 yellow bellied? 14:17:39

2 A No, I didn't consider Jerry Bruckheimer 14:17:41
3 to be yellow -- 14:17:46

4 Q Did you consider Sean Bailey to be yellow 14:17:46
5 bellied? 14:17:50

6 A Yeah. 14:17:50

7 Q Why? 14:17:50

8 A Because he wasn't man enough to -- 14:17:52
9 listen, I was involved in five films in that series 14:17:59
10 of Pirates of the Caribbean, and I was very lucky 14:18:06
11 to be a part of that, and I was very happy -- I'm 14:18:10
12 happy still that I was a part of that because I 14:18:14
13 have a character that has made a lot of people 14:18:16
14 smile and happy, and that gives me great pleasure, 14:18:20
15 but when -- when these people, who have made 14:18:26
16 upwards of four, five, six, seven billion, eight 14:18:35
17 billion dollars on a ration of films that you've 14:18:42
18 done for them and your character is on the ride in 14:18:49
19 Disneyland in three different spots and in Shanghai 14:18:58
20 and in Orlando and all over the place, I've found 14:19:02
21 it fascinating that not one call. 14:19:06

22 Nobody was man enough to give me the boot 14:19:09

1 based on allegations, and -- but it was still okay 14:19:14
2 to leave the supposed wife-beater on the rides, and 14:19:24
3 it's still okay for them to sell merchandise of the 14:19:31
4 supposed wife-beater, and they can still sell 14:19:35
5 action figures of the supposed wife-beater. They 14:19:40
6 haven't taken me off their rides. So I would say 14:19:44
7 that something's rotten in the state of Denmark. 14:19:50
8 Q Do you know for sure that you are not 14:19:55
9 going to be part of Pirates 6? 14:19:58
10 A Without question. 14:20:00
11 Q And is that based only on the article 14:20:02
12 that came out sometime after the op ed? 14:20:05
13 MR. CHEW: Objection to form of the 14:20:08
14 question. I think it misstates the testimony, but 14:20:13
15 you may answer. 14:20:16
16 A I don't -- I don't recall the dates of 14:20:17
17 what went first, how this all went down. I'm 14:20:23
18 sorry, your question again? 14:20:30
19 Q Do you know for certain -- 14:20:32
20 A Right. 14:20:33
21 Q -- that you are not on Pirates 6? 14:20:34
22 A Oh, that I said yes, no. 14:20:36

1	Q	And then I said is that --	14:20:38
2	A	Correct.	
3	Q	-- based on the article in the newspaper	14:20:40
4		sometime shortly after the op ed from Amber Heard.	14:20:43
5	A	Yes, I believe it's from that, and I	14:20:49
6		believe it's from the global barrage of -- of	14:20:52
7		fraudulent claims against me that -- that have	14:20:59
8		flown throughout the world on this thing called the	14:21:04
9		internet and in various magazines and all that. As	14:21:11
10		I've stated earlier, things that she said, did,	14:21:18
11		yeah, I believe of course, there was no way they	14:21:28
12		were going to let me in Pirates -- they were going	14:21:35
13		to bring me into Pirates 6 if someone's out there	14:21:38
14		screaming about you being this horrible human being	14:21:42
15		and then the press backs it up and sells it to you,	14:21:44
16		sells it, you know?	14:21:49
17	Q	So you assume that because of everything	14:21:51
18		that's been continuing on in these allegations,	14:21:54
19		that you're not going to be in Pirates 6?	14:21:58
20	MR. CHEW:	Objection to the form of the	14:22:00
21		question. It misstates the testimony.	14:22:02
22	A	I can tell you the God's honest truth	14:22:05

1 right now, based on everything, if they came to me 14:22:08
2 with \$300 million and a million alpacas, nothing 14:22:10
3 under this earth, on this earth would get me to go 14:22:21
4 back and work with Disney on a Pirates of the 14:22:26
5 Caribbean film. 14:22:29
6 Q Okay, thank you. If -- in your 14:22:30
7 complaint, you said at paragraph 5, quote, "Mr. 14:22:40
8 Depp's reputation and career were devastated when 14:22:45
9 Ms. Heard first accused him of domestic violence on 14:22:50
10 May 27, 2016," end of quote. In what way was your 14:22:53
11 career devastated at that point? 14:23:01
12 MR. CHEW: Excuse me. Which complaint 14:23:03
13 are you referring to? 14:23:04
14 MS. CHARLSON BREDEHOFT: His complaint. 14:23:05
15 MR. CHEW: Could you show it to him? 14:23:06
16 MS. CHARLSON BREDEHOFT: No, I don't need 14:23:08
17 to show it to him. I just quoted it. 14:23:09
18 MR. CHEW: You don't need to show him a 14:23:11
19 document you're asking him about? 14:23:13
20 BY MS. CHARLSON BREDEHOFT: 14:23:15
21 Q That's correct, I absolutely don't have 14:23:15
22 to. I'm asking him what his -- was your career in 14:23:16

1 suggest that Elon Musk is financing or behind Amber 17:02:04
2 Heard claiming that she has been domestically 17:02:10
3 abused and violent -- and the victim of domestic 17:02:14
4 violence by you? 17:02:19

5 MR. CHEW: And just to be clear, Johnny, 17:02:20
6 you cannot answer that if the information came from 17:02:21
7 your counsel. 17:02:25

8 A It's not going to be answered. It can't 17:02:26
9 be answered. 17:02:28

10 Q So the answer would be no, you have 17:02:29
11 nothing other than communications with counsel; is 17:02:31
12 that correct? 17:02:34

13 A Yes. 17:02:34

14 Q So let's go back. Do you have any 17:02:35
15 evidence of even a dollar that Amber Heard has made 17:02:43
16 based on the fact that she has come forward and 17:02:47
17 said she's the victim of domestic abuse and 17:02:50
18 violence by you? 17:02:53

19 MR. CHEW: Objection, asked and answered, 17:02:54
20 calls for speculation, but you may answer one last 17:02:56
21 time. 17:02:59

22 A You want to know if I have proof of that. 17:02:59

1	No, I can't say that I do. I haven't really	17:03:02
2	checked in with her.	17:03:04
3	Q Do you have any evidence at all that	17:03:05
4	Amber Heard has received any kind of movie role or	17:03:08
5	opportunity as a result of saying -- coming forward	17:03:13
6	and saying that she was the victim of domestic	17:03:17
7	violence and abuse by you?	17:03:19
8	A I don't know the answer to that.	17:03:21
9	Q All right. What do you think your	17:03:27
10	reputation is today?	17:03:33
11	MR. CHEW: Objection. That's vague and	17:03:34
12	ambiguous.	17:03:35
13	THE WITNESS: That's --	17:03:36
14	MR. CHEW: Objection to the form of the	17:03:37
15	question, vague and ambiguous.	17:03:38
16	BY MS. CHARLSON BREDEHOFT:	17:03:40
17	Q You have contended that you are damaged	17:03:40
18	in your complaint, your reputation is damaged.	17:03:42
19	What is your reputation --	17:03:46
20	MR. CHEW: Objection to the form of the	17:03:48
21	question.	17:03:49
22	BY MS. CHARLSON BREDEHOFT:	17:03:50

Transcript of John C. Depp, II
Conducted on November 10, 2020

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1 MR. CHEW: Objection to the form of the 17:46:40
2 question, asked and answered. He's already said 17:46:41
3 that he knew that he was ordered to be here today. 17:46:44
4 BY MS. CHARLSON BREDEHOFT: 17:46:46
5 Q At 10:00 a.m. 17:46:46
6 A Yes, ma'am. 17:46:49
7 Q Were you aware of that? 17:46:50
8 A I wasn't driving. I'm sorry I didn't 17:46:51
9 make it at 10:00 on the spot. 17:46:53
10 Q So it's somebody else's fault that you 17:46:55
11 weren't here at 10:00. 17:46:57
12 MR. CHEW: Objection to the form of the 17:46:59
13 question, argumentative. 17:47:00
14 A I cannot -- okay, I'll take the hit. My 17:47:02
15 apologies. As I said earlier, my apologies for 17:47:05
16 arriving late. It was about midnight when I got 17:47:09
17 back, but you don't want to hear that. 17:47:16
18 Q So -- 17:47:18
19 A Or when I arrived. Sorry. 17:47:20
20 Q **So let's go back to talk a little bit** 17:47:22
21 **about your reputation and what was going on in your** 17:47:24
22 **life back in 2015 and 2016. You had pretty** 17:47:27

1 **significant financial issues in that time frame,** 17:47:32
2 **didn't you?** 17:47:36
3 MR. CHEW: Objection to the form of the 17:47:36
4 question, vague and ambiguous. 17:47:38
5 A **I had been -- yes, I was -- a lot of** 17:47:42
6 **money was stolen from me by my business manager --** 17:47:52
7 **my former business managers and my former lawyer,** 17:47:56
8 **Jake Bloom, Joel Mandel and his brother, Rob** 17:48:00
9 **Mandel.** 17:48:05
10 Q **How much money did Joel Mandel and Rob** 17:48:07
11 **Mandel steal from you?** 17:48:10
12 A **I was told it was somewhere in the** 17:48:12
13 **neighborhood of 650 million.** 17:48:13
14 MR. CHEW: And again, I would instruct 17:48:17
15 you not to answer to the extent that you would have 17:48:20
16 to disclose attorney-client communication, but you 17:48:23
17 can answer to the extent you have information 17:48:26
18 outside of what you discussed with any of your 17:48:29
19 counsel. 17:48:32
20 A Yeah, no, this was something that I was 17:48:33
21 told, and it didn't -- I didn't ever dream that I 17:48:36
22 had made that much money. 17:48:44

1 Q Did Edward White tell you that Joel 17:48:47
2 Mandel and Rob Mandel stole \$650 million from you? 17:48:50

3 A Edward White was brought in as my 17:48:55
4 business manager to conduct a forensic audit on the 17:48:59
5 Mandels, but prior to that, it was pretty clear 17:49:06
6 that that was -- that was what had happened, and I 17:49:16
7 engaged them in a lawsuit. 17:49:22

8 Q What do you mean by it was pretty clear 17:49:27
9 that that had happened? 17:49:29

10 A Well, when I was -- I found out from 17:49:32
11 Mandel on a phone call just after I'd finished 17:49:37
12 Pirates 5 when Ms. Heard and I had taken the Orient 17:49:43
13 Express and went to San Francisco for our belated 17:49:48
14 honeymoon, I received a phone call from Joel 17:49:52
15 Mandel, who started telling me to start selling 17:49:54
16 houses and things of that nature, which I found 17:49:58
17 quite surprising, since I'd just finished a film 17:50:01
18 where I'd made, as I said, 35 million as a salary. 17:50:05
19 So it didn't seem to make a whole lot of sense, and 17:50:12
20 then we had more of a conversation, and then I 17:50:20
21 found out he'd done some extracurricular things. 17:50:22

22 Q Like what? 17:50:26

1 A Just things that you wouldn't do. For 17:50:27
2 example, if I buy a couple of penthouses in a 17:50:30
3 building and I'm paying full price and he's 17:50:34
4 negotiating the deal but I pay full price for all 17:50:38
5 of these penthouses, and from that, he makes a deal 17:50:41
6 and gets \$800,000 cut off his -- his purchase, his 17:50:48
7 and his brother's purchase of one of those -- or 17:50:59
8 one of those lofts downtown in that same building, 17:51:01
9 and they got it for one million as opposed to 1.8, 17:51:05
10 after I'd pay full price for five of them. 17:51:13
11 Q Anything else? 17:51:16
12 A That's -- there are -- yeah, there are a 17:51:17
13 lot of things, but you know, I don't want to go on 17:51:30
14 a tangent, so ask me specifically what you'd like 17:51:34
15 me to talk about. 17:51:37
16 (Deposition Exhibit Number 3 was marked 17:51:50
17 for identification.) 17:51:50
18 MR. CHEW: May we have a copy please? 17:51:54
19 BY MS. CHARLSON BREDEHOFT: 17:51:56
20 Q Yeah, I'm working on that. I wanted to 17:51:56
21 make sure I wasn't giving you the wrong one. I'm 17:51:59
22 going to ask you to take a look at what has been 17:52:01

1 marked as Deposition Exhibit Number 3. Now, you 17:52:07
2 said you filed a suit against Mr. Mandel and his -- 17:52:09
3 The Mandel Company, correct? 17:52:12
4 A Yes, ma'am. 17:52:13
5 Q Or the management group, and did Adam 17:52:14
6 Waldman represent you in this endeavor? 17:52:18
7 A Yes, yes, ma'am. 17:52:21
8 Q And in fact, Mr. Mandel then filed a 17:52:22
9 cross-claim against you, your -- a couple of your 17:52:29
10 companies, Scaramanga Brothers, Inc., LRD 17:52:34
11 Productions, and then Edward White and Edward White 17:52:39
12 & Company, correct? 17:52:42
13 A Yes. 17:52:43
14 Q Okay. Now, I'm going to ask you to take 17:52:43
15 a look at the second page in that actually has page 17:52:48
16 1, and if you can go to paragraph 3, I'm going to 17:52:51
17 take you through, just so you know what I'm doing 17:52:57
18 here, I'm going to take you through a number of the 17:53:00
19 allegations in here. This -- this cross-claim was 17:53:03
20 filed in public court, right, in Los Angeles, 17:53:07
21 public record? 17:53:11
22 A Okay. 17:53:13

1 Q Well, do you have any reason to believe 17:53:13

2 that's not the case? 17:53:15

3 A No, I mean, I don't -- I'm just agreeing 17:53:16

4 with you. 17:53:23

5 MR. CHEW: Mr. Depp -- Mr. Depp, I would 17:53:23

6 say that you should, before answering any specific 17:53:24

7 questions about this, you should read as much or as 17:53:27

8 little of the cross-complaint filed by Mandel that 17:53:30

9 you feel is necessary to give you context. 17:53:33

10 BY MS. CHARLSON BREDEHOFT: 17:53:36

11 Q So I'm going to ask you to take a look at 17:53:36

12 paragraph 3 on the first page. 17:53:40

13 A Uh-huh. 17:53:44

14 Q And it says, "Over a 17-year 17:53:45

15 relationship, TMC and Joel Mandel did everything 17:53:47

16 within their power to professionally and 17:53:50

17 competently handle the vast array of transactions, 17:53:52

18 expenses and demands made by Depp. They used the 17:53:55

19 full resources of TMC and outside professionals to 17:53:58

20 handle his many matters. TMC repeatedly warned and 17:54:01

21 advised Depp to reduce his spending and sell 17:54:05

22 unnecessary assets, but ultimately the decision 17:54:08

1 (whether and how to spend his money was a decision) 17:54:11
2 for Depp to make. Depp listened to no one, 17:54:13
3 including TMG and his other advisors, and he 17:54:16
4 demanded they fund a lifestyle that was extravagant 17:54:19
5 and extreme." Would you agree with that? 17:54:22
6 A (No.) 17:54:24
7 Q (In paragraph 4, he says, "By his 17:54:24
8 complaint, Depp disingenuously suggested he cannot 17:54:29
9 remember, A, where he spent his money, or B, being 17:54:34
10 told by TMJ to stop spending. To remind him, 17:54:37
11 throughout the entire 17-year period that TMJ 17:54:41
12 represented Depp, Depp lived in an 17:54:44
13 ultra-extravagant lifestyle that often knowingly 17:54:46
14 cost Depp in excess of \$2 million per month to 17:54:51
15 maintain, which he simply could not afford." Would 17:54:54
16 you agree with that? 17:54:57
17 A (Two million dollars per month to maintain 17:54:58
18 my ultra-extravagant lifestyle would be -- no, I 17:55:06
19 mean --) 17:55:22
20 Q (How much were you spending?) 17:55:23
21 A (It is possible that in terms of the -- 17:55:24
22 the various salaries that I was paying for the) 17:55:28

1 **company, my production company or for the people** 17:55:35
2 **who take care of the various houses, that doesn't** 17:55:41
3 **-- per month, seems excessive, but okay, if that's** 17:55:49
4 **what he wants to say, then it's 24 million a year.** 17:55:55
5 Q Do you believe that's an accurate figure, 17:55:59
6 the two million per month? 17:56:02
7 MR. CHEW: Objection to the form of the 17:56:04
8 question. What year are we talking about? This 17:56:06
9 talks about a 17-year period. Are you asking for 17:56:12
10 -- which year in that 17-year period? 17:56:15
11 MS. CHARLSON BREDEHOFT: I'm asking if 17:56:17
12 what he said here in excess of two million per 17:56:18
13 month to maintain. 17:56:21
14 MR. CHEW: For what year? 17:56:21
15 MS. CHARLSON BREDEHOFT: You know what? 17:56:23
16 I don't have to answer your question. When did 17:56:24
17 they file it? 17:56:26
18 MR. CHEW: If you don't want a record 17:56:27
19 that's clear, that's fine, okay. Answer the 17:56:28
20 question if you know what she's talking about. I 17:56:30
21 don't. 17:56:32
22 BY MS. CHARLSON BREDEHOFT: 17:56:34

1 Q (In 2016, was it two million per year -- 17:56:34
2 per month? 17:56:38
3 A (I'm not going to sit here and agree with 17:56:39
4 Joel Mandel's numbers because it's very clear that 17:56:41
5 Mandel was protecting his ass -- excuse me.) 17:56:49
6 Pardon, pardon, but he was protecting himself -- 17:56:53
7 Q (All right, you said that -- 17:56:57
8 (A) -- because you do that when you steal. 17:56:58
9 (Q) Well, and you said he stole \$650 million. 17:57:01
10 (What was your net worth -- 17:57:04
11 (A) I was -- 17:57:05
12 (Q) -- if he stole 650 million? 17:57:06
13 A (I was told that it was in excess of 650 17:57:06
14 million since Pirates 2 and 3.) 17:57:11
15 Q (What was your net worth? 17:57:15
16 A (I don't know. 17:57:17
17 Q (Was it more than 650 million? 17:57:19
18 A (I don't know any of that. I don't follow 17:57:21
19 those things. I'm not looking -- I'm not in a 17:57:23
20 popularity contest or any competition or looking 17:57:26
21 for more money than anybody else.) 17:57:29
22 Q (Paragraph 5 says, "Depp spent in excess 17:57:32

1 (of 75 million to acquire, improve and furnish 14) 17:57:34
2 (residences, including a 45 acre chateau in the) 17:57:38
3 (south of France, a chain of islands in the Bahamas,) 17:57:43
4 (multiple houses in Hollywood, several penthouse) 17:57:46
5 (lofts in downtown Los Angeles, and a fully) 17:57:50
6 (functioning horse farm in Kentucky. In addition to) 17:57:51
7 (property taxes, upkeep and insurance, all of these) 17:57:54
8 (residences required a staff of employees to service) 17:57:56
9 (and maintain." Would you agree with that?) 17:57:58
10 A (Seventy-five million to acquire, improve) 17:58:01
11 (and furnish 14 residences, including all that, no,) 17:58:06
12 (I would not. I would say that that is a man who) 17:58:07
13 (was covering his -- his -- his -- his misgivings) 17:58:11
14 (because the one thing that is not in here that Joel) 17:58:22
15 (Mandel is not going to -- did not mention is the) 17:58:25
16 (fact that there were about eight or nine boxes of) 17:58:28
17 (my records -- when we were finally allowed to get) 17:58:33
18 (my records, there were about eight or nine boxes) 17:58:38
19 (that were not there, and when Ed White asked where) 17:58:42
20 (they were, the Mandels' answer was well, there are) 17:58:46
21 (no -- there are no -- there's no paper, there's --) 17:58:50
22 (there are no files and boxes on those, and Mr.) 17:58:54

1 White said and where -- then where are they, and he 17:58:58
2 said -- Mr. Mandel said they're in my head. 17:59:02
3 Q (So how many -- how much did you spend to 17:59:06
4 acquire, improve and furnish those 14 residences?) 17:59:09
5 A (I don't know, but judging from the amount 17:59:13
6 of work that I did not do, it wasn't 75 million.) 17:59:16
7 Q (Was it more or less?) 17:59:20
8 A (I would say it was far less.) 17:59:21
9 Q (Fifty million?) 17:59:25
10 A (At least.) 17:59:27
11 Q (Okay.) 17:59:29
12 A (I mean, if I was really going to put 17:59:30
13 something together, then it would have been -- it 17:59:33
14 would look like that.) 17:59:36
15 Q (Paragraph 6, "During this same time, Depp 17:59:37
16 spent lavishly on various luxury items, including 17:59:40
17 spending over 18 million to acquire and renovate a 17:59:43
18 150 luxury yacht. Depp spent millions more 17:59:46
19 acquiring and/or maintaining at least 45 luxury 17:59:49
20 vehicles. He spent 30,000 per month on expensive 17:59:54
21 wines that he had flown to him around the world for 17:59:58
22 his personal consumption.) (Depp also paid over \$3 18:00:01

1 million to blast from a specially made canon the 18:00:05
2 ashes of author Hunter Thompson over Aspen, 18:00:08
3 Colorado." 18:00:12
4 A Right. 18:00:12
5 Q Now, do you recall saying that it was 18:00:13
6 actually five million when you were in the U.K.? 18:00:15
7 A It was five million. 18:00:18
8 Q So he's low on this one. It was actually 18:00:19
9 more than you spent. 18:00:22
10 A Yeah. Maybe that's because he was there 18:00:23
11 and he flew on my plane with -- he flew on the 18:00:26
12 plane with me to get a free ride, and he was 18:00:27
13 actually -- he actually attended the blast-off and 18:00:29
14 enjoyed himself. 18:00:35
15 Q Do you remember giving an interview to 18:00:37
16 Rolling Stone saying that the 30,000 a month was 18:00:42
17 wrong and an insult and that you spent much more 18:00:48
18 than that on wine? 18:00:52
19 MR. CHEW: Objection to the form of the 18:00:53
20 question, assumes facts not in evidence, lack of 18:00:54
21 foundation. 18:00:56
22 A I did say that, but in saying that, we're 18:00:57

1 (talking about living in a penthouse with Ms. Heard, 18:01:10
2 her entourage, Rocky Pennington and Josh Beard, the 18:01:14
3 Beard guy, and their friends, and the \$30,000 of 18:01:22
4 wine was, especially when I was out of town, 18:01:32
5 certainly not consumed by me. When I was in town, 18:01:36
6 if I were drinking at the time, Amber and I would 18:01:41
7 have some wine, but otherwise, that wine was free 18:01:44
8 rein to all her friends, and that's where they went 18:01:51
9 and got it and that's what they drank, and they 18:01:55
10 weren't shy. 18:01:58
11 Q So the 30,000 is Amber and Amber's 18:01:59
12 friends that are -- that are drinking this, not 18:02:02
13 you. 18:02:04
14 A It's kind of like sitting down to dinner, 18:02:06
15 buying everyone dinner and saying they're not 18:02:11
16 eating, they're not going to eat theirs. The wine 18:02:13
17 was accessible by everyone, and Amber would -- 18:02:17
18 she's not shy about making sure she has some. 18:02:22
19 Q How often was Amber traveling on films 18:02:26
20 during the time you were married? 18:02:30
21 A Three, four, five maybe, six. 18:02:32
22 Q And how often did you stay at the 18:02:37

1 Sweetzer residence rather than at the penthouse 18:02:43
2 while you were married to Amber? 18:02:45
3 A Occasionally when things got to the point 18:02:47
4 where there was no talking her down from her 18:02:57
5 tirades and her violence, there were a number of 18:03:01
6 occasions when I would call Mr. Bett or I would 18:03:04
7 call any -- whoever security was there at the time, 18:03:08
8 because we had security at the penthouses all the 18:03:14
9 time, then -- 18:03:17
10 Q My question was how often. 18:03:21
11 A I would have left her about 20 to 25 18:03:22
12 times and gone to Sweetzer to get away from her. 18:03:27
13 Q For what period of time would you 18:03:31
14 typically stay at Sweetzer when you left? 18:03:32
15 A Typically? There was nothing typical, so 18:03:35
16 I can't say. I mean, if I would leave -- well, 18:03:39
17 I've left her in the middle of the night before 18:03:42
18 when she went nuts and made it home, everything was 18:03:45
19 fine, and within five minutes, she's in the parking 18:03:51
20 lot, having driven over in her pajamas and she's 18:03:54
21 crying and she's screaming out for me to come out 18:04:00
22 of the house. 18:04:04

1	Q	So --	18:04:05
2	A	That happened frequently.	18:04:06
3	Q	How many -- you were married for 15	18:04:07
4		months, correct?	18:04:11
5	A	Sure.	18:04:12
6	Q	Of the 15 months, how much of that time	18:04:13
7		did you spend the night at Sweetzer?	18:04:16
8	A	Of those 15 months, well, for sure,	18:04:18
9		between August 22nd -- excuse me, April 22nd,	18:04:26
10		Ms. Heard's birthday, and -- and May 20 -- well,	18:04:32
11		3rd was the -- no, 21st was when she had her whole	18:04:46
12		other allegation and incident. That was the 21st.	18:04:53
13		That was the last time I saw her. So I was away	18:05:00
14		there for nearly a month there, right, something,	18:05:06
15		and prior to that, I would say I probably had to	18:05:12
16		leave her presence no less than two dozen times.	18:05:16
17	Q	No less than 2,000, and how many --	18:05:21
18	A	Two dozen.	18:05:23
19	Q	Two dozen. I was going to say, I don't	18:05:24
20		even think there's that many days, but okay.	18:05:27
21		MR. CHEW: That must have been really	18:05:29
22		bad.	18:05:30

1	MS. CHARLSON BREDEHOFT: If he wants to	18:05:30
2	say 2,000, he's got it.	18:05:32
3	MR. CHEW: Sorry.	18:05:33
4	BY MS. CHARLSON BREDEHOFT:	18:05:34
5	Q So -- so less than two dozen times, so	18:05:34
6	that's 24, right?	18:05:37
7	MR. CHEW: Sorry.	18:05:38
8	BY MS. CHARLSON BREDEHOFT:	18:05:39
9	Q As opposed to 2,000, right? All right.	18:05:39
10	So of those no less than two dozen times,	18:05:41
11	approximately how much of that -- how long -- what	18:05:44
12	was the average amount of time you spent over at	18:05:48
13	Sweetzer on each of those two dozen times?	18:05:50
14	A One time it was maybe two or three days.	18:05:53
15	Another time it was just one day. So it varied	18:05:56
16	depending on the situation and how stubborn either	18:06:01
17	one of us were going to be.	18:06:11
18	Q Let me just jump back for a moment,	18:06:12
19	because we were talking about it earlier. You said	18:06:15
20	that you left from April 22nd early in the morning,	18:06:17
21	I think you said 4:30 in the morning, and didn't	18:06:21
22	return until May 21, correct?	18:06:24

1	A	Yes.	18:06:25
2	Q	And I believe you testified earlier this	18:06:26
3		morning when you were telling some stories that --	18:06:28
4		and I didn't mean that like stories. I meant a	18:06:30
5		long answer, that you had told her you were leaving	18:06:34
6		her; is that correct? At 4:30 in the morning April	18:06:37
7		22nd, you told her you were leaving her, correct?	18:06:43
8		You were going to divorce her?	18:06:45
9	A	No.	18:06:47
10	Q	You didn't tell her that?	18:06:48
11	A	No, I didn't tell her I was going to	18:06:49
12		divorce her then, no.	18:06:52
13	Q	What did you tell her when you left that	18:06:54
14		day?	18:06:57
15	A	I said don't follow me, don't -- don't --	18:06:57
16		don't hit me, don't touch me, don't come near me,	18:07:07
17		I'm getting a few things, don't follow me, I'm	18:07:11
18		leaving, and I left.	18:07:14
19	Q	Okay.	18:07:15
20	A	And I had believe it was Sean -- I	18:07:16
21		believe it was Sean Bett who came up and helped me	18:07:19
22		get things out without there being a scene.	18:07:24

1 Q Okay, that's -- 18:07:26

2 A Sure, yeah, yeah. I won't continue. 18:07:28

3 Don't worry. 18:07:30

4 Q That answers my question. Okay, so let's 18:07:30

5 go back to this one. Is it true that you had a 150 18:07:32

6 foot luxury yacht that you spent over 18 million to 18:07:39

7 acquire and renovate? 18:07:42

8 A Yes. 18:07:43

9 Q All right. Is it true that you had 45 18:07:43

10 luxury vehicles? 18:07:45

11 A No, no, ma'am. 18:07:46

12 Q How many did you have? 18:07:47

13 A I have about five or six cars, and I have 18:07:49

14 about eight motorcycles. 18:07:56

15 Q Paragraph 7, "Depp also spent wildly on 18:07:58

16 expensive collectibles, including millions to 18:08:04

17 acquire and maintain a massive and extremely 18:08:06

18 expensive art collection, including over 200 18:08:08

19 collectable pieces and works by world-famous 18:08:10

20 artists such as Warhol, Klimt, Basquiat" -- I'm 18:08:13

21 going to screw these up -- "and Modigliani, many 18:08:19

22 pieces of expensive world-class jewelry, and 18:08:20

1 (approximately 70 collectable guitars. Depp also) 18:08:23
2 spent many millions more over the years on) 18:08:27
3 (extremely rare and expensive Hollywood) 18:08:30
4 (collectibles, including" -- I'm doing a dot dot dot) 18:08:31
5 (here -- "Marilyn Monroe, John Dillinger and Marlon) 18:08:34
6 (Brando. The collection was so extensive that it) 18:08:39
7 (took approximately 12 storage facilities and has) 18:08:41
8 (cost over a million additional dollars to attempt) 18:08:44
9 (to archive." (Would you agree with that?) 18:08:46
10 A (Oh, I think that he's exaggerating quite) 18:08:49
11 (a lot. I bought Hunter S. Thompson's archive, yes,) 18:08:52
12 (for -- for the -- he had asked me if I would buy it) 18:08:57
13 (while he was still alive. I said no, I can't do) 18:09:04
14 (that to you, and I bought it after he passed away) 18:09:07
15 (because we were going -- it was going to be) 18:09:12
16 (piecemealed out, so I bought it and preserved it,) 18:09:14
17 (and I have it preserved all in one safe place so) 18:09:18
18 (that it can stand the test of time.) 18:09:21
19 Q (Do your collectibles --) 18:09:25
20 A (That cost a million -- that was a million) 18:09:27
21 (dollars.) 18:09:29
22 Q (Okay, cost over a million. Do you have) 18:09:30

1 (12 storage facilities that you were keeping all) 18:09:33
2 (these collectibles in?) 18:09:36
3 A (Not that I'm aware of. I know that) 18:09:38
4 (there's some storage facilities.) 18:09:42
5 Q (How many --) 18:09:44
6 A (I've been living in Los Angeles for a) 18:09:45
7 (long time. I've never been to one, so I don't) 18:09:46
8 (know.) 18:09:49
9 Q (Do you know how many collectable pieces) 18:09:49
10 (you have in your art collection?) 18:09:51
11 A (Well, let's see. To pay the taxes that) 18:09:53
12 (the Mandels never paid to the U.S. government for) 18:10:02
13 (17 years, I sold a -- quite a nice collection of) 18:10:06
14 (Basquiat paintings to be able to pay the) 18:10:15
15 (government.) 18:10:19
16 Q (Did you have 70 collectable guitars?) 18:10:20
17 A (Oh, I have, yeah, at least 70 guitars,) 18:10:23
18 (and the boat, yes, I think I bought it for 15, put) 18:10:28
19 (a few million into it, and then when I sold the) 18:10:33
20 (boat when I was told sell, I sold it to a very very) 18:10:37
21 (-- someone who had chartered the boat who had loved) 18:10:43
22 (it, and I sold it to them for 22 or 23 million.) So 18:10:47

1 I'm one of the only few people -- 18:10:54

2 Q Is that J.K. Rowling? 18:10:56

3 A -- who actually made a profit on a boat. 18:10:57

4 Q Was that J.K. Rowling that you sold that 18:11:00

5 to? 18:11:03

6 A Who purchased the boat? 18:11:03

7 Q Yes. 18:11:05

8 A Yes, it was, yeah. 18:11:05

9 Q All right, Paragraph 8, "Depp employed a 18:11:06

10 staff of approximately 40 full-time employees 18:11:09

11 around the world, which cost Depp at least 300,000 18:11:12

12 per month to maintain." Would you agree with that? 18:11:15

13 A No. 18:11:17

14 Q How many employees do you have full time? 18:11:18

15 MR. CHEW: Objection to the form of the 18:11:20

16 question as to -- vague as to at what time. 18:11:27

17 A I mean, you know, probably at the office, 18:11:32

18 maybe there were -- my production company, maybe 18:11:37

19 there were eight. In the south of France, there 18:11:41

20 were three. On the island, there are four. Two or 18:11:44

21 three security guards, that is to say, a security 18:11:53

22 guard with my kids to take them to school and pick 18:11:59

1 **them -- and keep an eye on them. No, 40 employees,** 18:12:05
2 **no. Again, I think he's reaching for the stars.** 18:12:13
3 Q Was Tara Roberts one of the employees 18:12:17
4 that you -- 18:12:19
5 A Tara Roberts is one of four who lives on 18:12:20
6 the island, yes. 18:12:23
7 Q Do you know how much you pay her per 18:12:23
8 year? 18:12:29
9 A I don't. 18:12:29
10 Q Okay. You've got several companies, 18:12:29
11 don't you? 18:12:31
12 A I have several -- what are they? LLCs, 18:12:31
13 and Scaramanga Brothers is one that I believe I get 18:12:34
14 paid through from the films, I believe, and then I 18:12:39
15 don't know what the other -- then there's the LLC 18:12:44
16 that owns the hamlet in the south of France, and 18:12:50
17 then there's Infinitum Nihil and a couple of things 18:12:58
18 around that, yes. 18:13:02
19 Q Do you know how many people you 18:13:03
20 physically have on a payroll where they're actually 18:13:04
21 getting paid through a payroll? 18:13:08
22 A I don't. I really don't. 18:13:10

1 Q Paragraph 9, "Depp also refused to fly by 18:13:12
2 any means other than by private plane and required 18:13:16
3 at least a Gulfstream GV or above. Depp's constant 18:13:21
4 use of private planes amounted to an additional 18:13:22
5 200,000 a month in expenses." Was that correct in 18:13:23
6 2016? 18:13:27
7 A In 2016, no. In 2000 -- no, in 2016, no, 18:13:27
8 I didn't have the dough to do that. 18:13:41
9 Q What do you mean? 18:13:43
10 A I didn't have the money to do that. In 18:13:44
11 2016, when I finished up Pirates and we went on our 18:13:46
12 honeymoon, that was when I got the call from Mr. 18:13:59
13 Mandel when I was in San Francisco telling me that 18:14:02
14 it was time to sell -- I have to sell the house in 18:14:08
15 France immediately, you know, I have to -- my mom 18:14:12
16 was -- at the time was very ill and dying and I was 18:14:17
17 told that I had to have -- she had to be in a house 18:14:23
18 without stairs, so I rented a house for her, and it 18:14:27
19 was quite expensive. 18:14:33
20 I was told she had three months to live. 18:14:35
21 I rented it and had 24-hour nurses for her. There 18:14:38
22 was no agreement as to the amount of time that we 18:14:46

1 were supposed to be there. So I didn't know what 18:14:54
2 was going to happen with my mother, and basically 18:14:57
3 what happened is Mandel had extended the period on 18:15:00
4 that rental property by about six months without 18:15:03
5 asking me, which ultimately I think it cost us -- 18:15:09
6 it was 120 grand or something like that that he 18:15:13
7 cost me just because he had decided to extend some 18:15:21
8 lease that did not need to be extended. 18:15:29
9 Q So did you fly commercial airlines in 18:15:32
10 2016? 18:15:37
11 A I've flown commercial airlines since 2016 18:15:38
12 a number of times. I've also flown private a 18:15:44
13 number of times. 18:15:47
14 Q In 2015, did you spend over 200,000 a 18:15:48
15 month in jets? 18:15:51
16 A I would have to look at my working 18:15:53
17 schedule. Nine times out of ten, when you're doing 18:15:55
18 a film and you're going across to Europe or you're 18:15:59
19 going somewhere far away, it is the production's 18:16:04
20 responsibility to get you there. Because of -- 18:16:10
21 because it's not really all that possible for me to 18:16:16
22 go out into the street or stand in a line at an 18:16:24

1	airport or go through all that, it is -- it can be	18:16:30
2	challenging.	18:16:34
3	It can be challenging because you're	18:16:35
4	essentially -- or I was -- I'm essentially a	18:16:40
5	novelty, and it does -- it does take its toll on	18:16:44
6	you. There are times when you'd like to be -- feel	18:16:50
7	normal. I mean, if you don't have anonymity	18:16:55
8	anymore like at least to be -- feel okay and	18:17:03
9	normal.	18:17:03
10	Q "In addition," paragraph 10, "throughout	18:17:04
11	the years, Depp supported his friends, family and	18:17:05
12	certain employees at a cost of over ten million	18:17:08
13	dollars. For example, Depp requested, approved and	18:17:11
14	expected TMG to pay certain living expenses for his	18:17:14
15	sisters and mother. By way of another example, for	18:17:15
16	over seven years, Depp funded a start-up music	18:17:18
17	label, Unison, which was run by his childhood	18:17:21
18	friend." I take it that's Bruce -- is that Bruce	18:17:24
19	Witkins?	18:17:27
20	A Yes, ma'am.	18:17:28
21	Q "After years of advising Depp that the	18:17:29
22	venture was not generating revenue, and after	18:17:31

1 expending over four million, Depp finally allowed 18:17:33
2 TMG to stop funding the operation in 2015." Is 18:17:38
3 that accurate? 18:17:39

4 A It's not accurate at all, no. I had 18:17:40
5 asked Joel Mandel to have a talk with Bruce Witkin 18:17:43
6 at least a year before and probably a year before 18:17:51
7 that. Mr. Witkin's very stubborn and he was very 18:17:53
8 happy with the amount of money that Joel Mandel was 18:17:57
9 giving him every month to run this record company. 18:18:00
10 Mandel did not stop the record company with Mr. 18:18:03
11 Witkin. I had tried to get Mr. Witkin to merge, 18:18:07
12 and Mandel wasn't able to do that, so it was -- it 18:18:11
13 was a failure, and it had been a failure, that 18:18:18
14 record company, and Mandel actually let it continue 18:18:21
15 for another two years. 18:18:27

16 Q Did you ever accuse Bruce Witkin of 18:18:29
17 stealing from you? 18:18:33

18 A Bruce Witkin of stealing from me? 18:18:33

19 Q Yes. 18:18:36

20 A No. 18:18:37

21 Q Paragraph 13, "When Depp's spending 18:18:37
22 outpaced his earnings and he refused to change his 18:18:41

1 lifestyle, he was forced to borrow large sums of 18:18:44
2 money to continue living the lifestyle he chose. 18:18:46
3 Every purchase, expenditure and borrowing for Depp 18:18:50
4 was approved by him and/or Dembrowski, and every 18:18:51
5 check written on his behalf was signed by or 18:18:55
6 approved by Depp and/or Dembrowski. Dembrowki on 18:18:56
7 behalf of Depp also signed all of Depp's payments 18:19:00
8 to TMG for management fees." Is that correct? 18:19:03
9 A No, this is -- no, this is -- no, this is 18:19:06
10 leading towards -- when Depp's spending outpaced 18:19:19
11 his earnings and he refused to change his 18:19:24
12 lifestyle, he was forced to borrow large sums of 18:19:27
13 money to continue living the lifestyle he chose. 18:19:30
14 No, I was forced to borrow large sums of money to 18:19:32
15 pay the United States government millions, tens and 18:19:36
16 tens and tens of millions of dollars because they 18:19:43
17 had not paid my taxes in 17 years. 18:19:46
18 I'd also gotten an \$8.6 million tax 18:19:51
19 penalty that I had to pay in the interim, during -- 18:19:55
20 during that whole time. So that went to the 18:20:02
21 government at some point without me knowing about 18:20:05
22 it because they will pay the -- they had to pay the 18:20:07

1 penalty, but they could postpone them on the taxes 18:20:10
2 for some reason, so -- 18:20:13
3 Q Do you remember testifying in the U.K. 18:20:14
4 that Mandel did not file your tax returns for 17 18:20:16
5 years? 18:20:20
6 A Yes, I think I -- I believe I did. I 18:20:20
7 don't remember if it came up, but it's -- it's the 18:20:25
8 truth. 18:20:28
9 Q Well, I'm going to ask you to take a look 18:20:29
10 at page 5, paragraph 18B that quoted from your 18:20:32
11 complaint, "TMJ never once timely filed Mr. Depp's 18:20:40
12 income tax returns or timely paid Mr. Depp's income 18:20:43
13 tax." 18:20:47
14 A I'm sorry, where are we? 18:20:47
15 Q Go to page 5. 18:20:48
16 A Page 5. 18:20:50
17 Q Top of -- very top of the page. 18:20:50
18 A Oh, okay, yes. 18:20:52
19 Q It's B. 18:20:53
20 A Yes, yes. 18:20:54
21 Q And then it goes on, "For 17 years, TMG 18:20:54
22 always timely filed his tax returns, and, funds 18:20:58

1	permitting, always timely paid his income tax."	18:21:00
2	Now, you were --	18:21:04
3	A I will -- I will see if we can produce	18:21:06
4	those.	18:21:09
5	Q Well, the court already ordered you to	18:21:10
6	produce them and you did not. Are you aware of	18:21:14
7	that?	18:21:16
8	A I am not aware of that, no.	18:21:17
9	MR. CHEW: Mr. Depp, I'm going to	18:21:19
10	instruct you not to answer any questions relating	18:21:21
11	to your communications with your counsel, and I	18:21:24
12	would also note for the record that most of these	18:21:26
13	paragraphs that you're citing were stricken by	18:21:31
14	subsequent order of the judge. Most of this	18:21:34
15	cross-complaint was stricken because there were all	18:21:37
16	kinds of allegations in the complaint that the	18:21:41
17	court struck. I'm just saying.	18:21:44
18	MS. CHARLSON BREDEHOFT: Mr. Chew, you	18:21:45
19	can --	18:21:47
20	MR. CHEW: It's a fact.	18:21:47
21	MS. CHARLSON BREDEHOFT: -- make those	18:21:49
22	arguments, you can come back and redirect.	18:21:49

1	MR. CHEW: No, I'm just pointing -- I	18:21:52
2	didn't know whether you knew that. I'm not trying	
3	to be provocative.	
4	MS. CHARLSON BREDEHOFT: Right, right.	
5	MR. CHEW: But I filed the motion. It	18:21:54
6	was granted.	18:21:56
7	MS. CHARLSON BREDEHOFT: I think you're	18:21:56
8	trying to coach here, but I think --	18:21:58
9	MR. CHEW: No, it's not --	18:21:59
10	MS. CHARLSON BREDEHOFT: We have the	18:22:01
11	documents, so --	18:22:01
12	MR. CHEW: I'm not. I'm just informing	18:22:02
13	you of what happened to these allegations. You're	18:22:03
14	also aware of what happened in the case.	18:22:06
15	BY MS. CHARLSON BREDEHOFT:	18:22:07
16	Q So Mr. Depp --	18:22:08
17	A Yes.	18:22:09
18	Q You have -- you have tax returns. Is	18:22:10
19	there a reason why you didn't produce your tax	18:22:14
20	returns in response to the court order in this case	18:22:17
21	for you to produce them?	18:22:20
22	MR. CHEW: I'm going to instruct you not	18:22:22

1 to answer any questions that require you to divulge 18:22:23
2 attorney-client privileges. If you want to talk 18:22:26
3 about document issues, you can address that to us 18:22:29
4 off line, so I'm instructing you not to answer that 18:22:31
5 question. 18:22:35

6 THE WITNESS: Uh-huh. 18:22:36

7 MR. CHEW: So move on please. 18:22:36

8 BY MS. CHARLSON BREDEHOFT: 18:22:38

9 Q Are you aware that we have filed a motion 18:22:38
10 for sanctions because you did not produce the tax 18:22:40
11 returns after the court ordered them? 18:22:43

12 MR. CHEW: And I'm going to instruct you 18:22:45
13 not to answer any questions that require you to 18:22:46
14 disclose attorney-client privilege, and he's 18:22:49
15 following that instruction, so you may go on to 18:22:52
16 your next question. 18:22:54

17 BY MS. CHARLSON BREDEHOFT: 18:22:55

18 Q Independent of your counsel, are you 18:22:55
19 aware of that? 18:22:57

20 A Independent of my counsel am I aware that 18:22:59

21 -- 18:23:01

22 Q Of the fact that -- that we have filed 18:23:02

1	motions for sanctions because you did not file --	18:23:04
2	you did not produce the tax returns that were	18:23:09
3	ordered by the court?	18:23:11
4	MR. CHEW: I would instruct you not to	18:23:12
5	answer that question unless you have any knowledge	18:23:14
6	of the subject independent of your communications	18:23:17
7	with any of your counsel.	18:23:19
8	A I'm going to say -- I'm going to take my	18:23:23
9	attorney's advice because I don't want to waste	18:23:46
10	your time.	18:23:49
11	Q My question is independent of your	18:23:50
12	counsel, do you have any knowledge of that.	18:23:52
13	A I'm sorry, I was just listening to what	18:23:54
14	my counsel said.	18:23:56
15	Q So the answer then would be independent	18:23:57
16	of anything your counsel had, you were not aware;	18:23:59
17	is that correct?	18:24:02
18	A No.	18:24:02
19	Q That's not correct? I asked that badly.	18:24:03
20	MR. CHEW: He said no, he doesn't have	18:24:06
21	independent --	18:24:07
22	BY MS. CHARLSON BREDEHOFT:	18:24:08

1 Q Okay, thank you. As long as we're all 18:24:08
2 clear on that one. Now, I'm going to flip you back 18:24:11
3 to the page before that, page 4. On paragraph 17, 18:24:15
4 near the end of it, it says, "In October 2015, 18:24:22
5 months before Depp fired TMG, Depp finally sent 18:24:26
6 Mandel a text message stating," quote, "I am ready 18:24:30
7 to face the music in whatever way I must. I know 18:24:33
8 there's a way to dig ourselves out of this hole and 18:24:36
9 I'm bound and determined to do it," end of quote. 18:24:40
10 Did you send that e-mail to Joel Mandel? 18:24:42
11 A Yes, I did. Now -- yes, I did, yeah, 18:24:45
12 sure. That's your answer. 18:24:48
13 Q You talked about -- a minute ago you 18:24:50
14 talked about the records, or lack of records. I'm 18:24:55
15 going to ask you to go to page 5 again, paragraph 18:24:59
16 D. The allegation that you made was, "TMG failed 18:25:03
17 to maintain a proper set of detailed accounting 18:25:07
18 records for Mr. Depp. In handling Depp's matters, 18:25:10
19 TMG maintained meticulous books and records. TMG 18:25:13
20 employed the Datafaction accounting software 18:25:17
21 system, which is the gold standard for business 18:25:19
22 managers in the entertainment industry. Every 18:25:21

1 expense and payment was booked, accounted for and 18:25:23
2 backed up." Do you see that? 18:25:26
3 A I see where it says that, yes. 18:25:28
4 Q Okay. Was it -- was there a software 18:25:29
5 system that they used? 18:25:31
6 A I don't know what their software -- I 18:25:32
7 know a few things of their -- well, I know their 18:25:38
8 lies, but this is -- that is absolutely 18:25:44
9 unequivocally a full-on bare-faced lie. Boxes 18:25:52
10 never arrived, files did not arrive. There's a 18:26:00
11 great discrepancy between them, and when you 18:26:04
12 receive those things, my apologies that they didn't 18:26:11
13 get to you when you wanted them, but when you do 18:26:15
14 receive Mandel's records and Ed White's 18:26:20
15 accompanying records and the description thereof, I 18:26:24
16 think you'll understand a little better about Mr. 18:26:28
17 Mandel and Rob Mandel's statements. 18:26:32
18 Q So your counsel just said a minute ago 18:26:35
19 you know how this ended. You settled the case with 18:26:38
20 TMG, did you not? 18:26:43
21 A I needed to -- you know, it was a 18:26:44
22 question of picking -- picking your battles just in 18:26:51

1 -- with regard to -- that was going -- it was 18:27:05
2 already a long and drawn-out situation. **You know,** 18:27:12
3 **we're dealing with Joel Mandel, who, you know,** 18:27:17
4 **starts threatening to destroy me and destroy my** 18:27:20
5 **career in front of a bunch of different lawyers.** 18:27:24
6 Q So how was the -- how was that settled? 18:27:33
7 A Well, it was -- it was settled in a sense 18:27:36
8 that obviously they -- they didn't -- they didn't 18:27:40
9 settle because all this was true. They settled 18:27:48
10 because they were looking at very serious legal -- 18:27:53
11 Q What were the terms of the settlement? 18:28:01
12 MR. CHEW: Now, I would just caution the 18:28:04
13 witness that the amount of the settlement -- the 18:28:06
14 settlement terms -- 18:28:08
15 THE WITNESS: No, not going to answer 18:28:10
16 that. 18:28:10
17 MR. CHEW: -- are strictly confidential, 18:28:10
18 so -- 18:28:12
19 MS. CHARLSON BREDEHOFT: But we have a 18:28:12
20 protective order here, and we have allegations and 18:28:13
21 they all relate -- they relate completely to the 18:28:16
22 reputation in this case and -- 18:28:18

1	MR. CHEW: Well, I'm going to --	18:28:20
2	THE WITNESS: Allegations --	18:28:21
3	MR. CHEW: I'm going to instruct you not	18:28:22
4	to answer until we go -- we'll go back and look at	18:28:24
5	that, but the agreement is Draconian. That's why	18:28:25
6	they settled, it was so -- the terms of disclosing	18:28:29
7	-- the confidentiality provisions of that	18:28:37
8	settlement agreement are Draconian imposed by the	18:28:41
9	other side, and so I'm going to instruct him not to	18:28:45
10	answer until I go back and look at it, but we've	
11	got two more days of deposition.	18:28:49
12	MS. CHARLSON BREDEHOFT: All right.	18:28:49
13	Well, go look and it and then we will --	18:28:50
14	MR. CHEW: Yeah.	
15	MS. CHARLSON BREDEHOFT: Because I think	
16	it's --	
17	MR. CHEW: Believe me, I would love to	18:28:53
18	tell you what the terms were, but as I recall, the	18:28:54
19	penalty for disclosing the amount is Draconian. We	18:28:58
20	cannot do it. If we have to go to Judge White, we	18:29:02
21	will, but I'll get a copy of the settlement	18:29:05
22	agreement. I just don't want to get him in trouble	18:29:07

1 and I don't want to get ourselves in trouble. 18:29:10

2 BY MS. CHARLSON BREDEHOFT: 18:29:13

3 Q So in addition to this cross-claim -- 18:29:13

4 THE WITNESS: Is it time? 18:29:14

5 MR. CHEW: It's almost -- 18:29:15

6 MS. CHARLSON BREDEHOFT: Yeah, let me 18:29:16

7 just finish this because it's Mandel. 18:29:17

8 MR. CHEW: Okay, sure. 18:29:19

9 BY MS. CHARLSON BREDEHOFT: 18:29:19

10 Q Also filed a complaint of judicial 18:29:19

11 foreclosure of deeds of trust. Do you recall that? 18:29:22

12 A Mr. Mandel? 18:29:23

13 Q Well, The Mandel Company. 18:29:24

14 A Right, yes. 18:29:26

15 Q Was that part of this settlement? 18:29:27

16 A Mandel and his brother, and also there's 18:29:30

17 another person at his company called Layne Dicker. 18:29:37

18 They're all in cahoots. Mr. Mandel had taken out a 18:29:42

19 couple of loans without my -- without asking me, 18:29:54

20 without asking me my permission or asking -- or 18:30:01

21 talking to me about any of it. One of the loans 18:30:07

22 was from himself and his brother Rob together. 18:30:13

1 They loaned me money, and they were using the 18:30:19
2 houses that I own on Sweetzer as their -- as the 18:30:24
3 collateral. 18:30:29
4 When I fired him, he gave me 20 days to 18:30:31
5 give him five million dollars or he was going to 18:30:35
6 foreclose on all of the houses based on a loan that 18:30:38
7 I wasn't aware of. 18:30:43
8 He also -- he and Jake Bloom were 18:30:46
9 involved in taking hard-money loans from a company 18:30:48
10 that Jake Bloom represented and was involved with 18:30:52
11 on financial levels, which were quite against the 18:30:58
12 law. 18:31:04
13 Q Was that Tycon?
14 A Mandel as well. Huh? 18:31:04
15 Q Was that Tycon? 18:31:04
16 A I don't know. 18:31:08
17 Q Did you use Gibson, Dunn & Crutcher for 18:31:08
18 that? 18:31:12
19 A I don't know. I don't remember exactly. 18:31:12
20 Q The complaint that was filed for judicial 18:31:15
21 foreclosure was November 6th, 2017, correct? Do 18:31:18
22 you want to take judicial notice or do you want me 18:31:26

1 to label it? 18:31:28

2 MR. CHEW: I think we should probably 18:31:28

3 label it. 18:31:29

4 MS. CHARLSON BREDEHOFT: All right. 18:31:30

5 MR. CHEW: That was just, so you know, so 18:31:30

6 we can short -- 18:31:32

7 MS. CHARLSON BREDEHOFT: Hold on. Don't 18:31:33

8 talk --

9 MR. CHEW: Okay.

10 MS. CHARLSON BREDEHOFT: -- because then

11 she can't label. 18:31:35

12 (Deposition Exhibit Number 4 was marked 18:31:43

13 for identification.) 18:31:43

14 MR. CHEW: Just to shortcut this, this 18:31:44

15 was part of the settlement of the other -- that was 18:31:45

16 part of this -- the TMG settlement. 18:31:49

17 BY MS. CHARLSON BREDEHOFT: 18:31:54

18 Q So the date that this was filed, if you 18:31:54

19 look on the first page, Mr. Depp, is November 6th, 18:31:56

20 2017, correct? 18:31:59

21 A Okay, yes, yes. 18:32:00

22 Q All right, and you terminated The Mandel 18:32:01

1 Company March 14, 2016, correct? 18:32:03

2 A I don't believe so because I -- 2016, 18:32:08

3 March 2016 -- yes, that could have been it, yes, 18:32:28

4 yes. My first -- my initial talk with Mandel was 18:32:31

5 in September when Ms. Heard and I were in San 18:32:36

6 Francisco. From there, when we went back to Los 18:32:39

7 Angeles, I -- I had extensive meetings with Mandel, 18:32:42

8 and of course, first and foremost, I wasn't going 18:32:50

9 anywhere near the idea of having been taken by 18:32:54

10 them. I just needed to understand the situation, 18:33:02

11 and -- and then he started to tell me what that 18:33:07

12 was. So that was in September, October, all 18:33:13

13 through then, and then I think it all -- yeah, it 18:33:19

14 probably came to the -- it was probably around 18:33:24

15 March. You would -- if it's on record, then you 18:33:28

16 would know for sure, but I guess -- sure. 18:33:29

17 Q Well, if you look at Depp Exhibit Number 18:33:34

18 3, page 3, paragraph 15 -- 18:33:37

19 A Exhibit Number 3. What -- 18:33:39

20 MR. CHEW: Three is their 18:33:42

21 cross-complaint. 18:33:43

22 A Yes, 3. Which paragraph? 18:33:45

1 Q Page 3, paragraph 15. It says -- 18:33:47

2 A There we go. 18:33:58

3 Q **It says, "Proving no good deed goes** 18:33:59

4 **unpunished, Depp, with no notice of any kind,** 18:34:03

5 **terminated TMG's services in March 2016," and I** 18:34:04

6 **know that it also has March 14 in here.** 18:34:08

7 A **So yes, TMG started -- in October 2016** 18:34:22

8 **started nonjudicial foreclosure proceedings against** 18:34:24

9 **certain of Depp's properties.** 18:34:29

10 Q While we're at it, go to page 20 real 18:34:32

11 quick. 18:34:49

12 MR. CHEW: Of Exhibit 4 or Exhibit -- 18:34:49

13 MS. CHARLSON BREDEHOFT: Exhibit 3. 18:34:51

14 MR. CHEW: Exhibit 3. Okay. Just so you 18:34:52

15 know, we're at about 6:35. 18:34:54

16 BY MS. CHARLSON BREDEHOFT: 18:34:56

17 Q Yeah, I'll finish up. I just want to 18:34:57

18 finish with this line. That's -- that's where it 18:34:59

19 talks -- paragraph 85 has Tryon Management 18:35:08

20 Services. That's what you were talking about, 18:35:11

21 right? 18:35:14

22 A Sure, that seems like it. 18:35:14

1 Q All right, and then go to paragraph 86. 18:35:16
2 At the end of it, it says, "Depp was at all times 18:35:18
3 represented by the preeminent law firm Gibson, Dunn 18:35:22
4 & Crutcher." Do you see that? End of paragraph 18:35:27
5 86, very end. 18:35:30
6 A Uh-huh, yes, yes. 18:35:32
7 Q Okay, then flip back to 19, page 19. 18:35:33
8 A Tryon -- in connecting with Tryon, Depp 18:35:37
9 was at all times represented by the preeminent law 18:35:42
10 firm Gibson, Dunn & Crutcher, that is -- that's not 18:35:46
11 anything that I was aware of at any point. 18:35:52
12 Q Okay. Can you flip back to page 19 just 18:35:56
13 real quickly so we can -- 18:35:59
14 A Sure thing. 18:36:00
15 Q -- that March 14 date? There is a method 18:36:01
16 to my madness. 18:36:03
17 A I've never heard of Gibson, Dunn & 18:36:05
18 Crutcher. 18:36:08
19 Q Paragraph 84 -- they'll be really 18:36:08
20 disappointed to hear that. 18:36:10
21 MR. CHEW: That would be good for that to 18:36:12
22 crimp their ego. 18:36:14

1 BY MS. CHARLSON BREDEHOFT: 18:36:15
2 Q Yeah. Paragraph 84 says he terminated 18:36:15
3 TMG as his business manager on March 14, 2016. 18:36:18
4 That's where I came up with that number. 18:36:21
5 A Okay. 18:36:23
6 Q Do you see that? 18:36:24
7 A Yes. 18:36:24
8 MS. CHARLSON BREDEHOFT: All right, we'll 18:36:25
9 go off the record. 18:36:27
10 MR. CHEW: Thank you. 18:36:27
11 THE VIDEOGRAPHER: We are going off 18:36:28
12 record. The time is 18:36. 18:36:30
13 (Off the record at 6:36 p.m.)
14
15
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1 CERTIFICATE OF SHORTHAND REPORTER - NOTARY PUBLIC

2 I, Karen Young, the officer before whom
3 the foregoing deposition was taken, do hereby
4 certify that the foregoing transcript is a true and
5 correct record of the testimony given; that said
6 testimony was taken by me stenographically and
7 thereafter reduced to typewriting under my
8 direction, and that I am neither counsel for or
9 related to, nor employed by any of the parties to
10 this case and have no interest, financial or
11 otherwise, in its outcome.

12 IN WITNESS WHEREOF, I have hereunto set
13 my hand and affixed my notarial seal this 17th day
14 of November, 2020.

15  
16 _____

17 NOTARY PUBLIC IN AND FOR
18 THE COMMONWEALTH OF VIRGINIA

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Transcript of John C. Depp, II, Volume 2

Date: November 11, 2020
Case: Depp, II -v- Heard

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V I R G I N I A:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

----- x

JOHN C. DEPP, II, :

Plaintiff, :

v. : Case No.

AMBER LAURA HEARD, : CL-2019-0002911

Defendant. :

----- x

Continued Videotaped Deposition of JOHN C. DEPP, II
Reston, Virginia

Wednesday, November 11, 2020

10:04 a.m.

Volume 2

CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER

Job No. 328714

Pages 267 - 571

Reported by: Karen Young

1 Continued Videotaped Deposition of JOHN C.
2 DEPP, II, held at the offices of:
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12 Pursuant to notice, before Karen Young,
13 Notary Public of the Commonwealth of Virginia.
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Amber Laura Heard, by mobile videoconference
Leslie Hoff, Charlson Bredehoft Cohen & Brown, P.C.
Michelle Bredehoft, Charlson Bredehoft Cohen &
Brown, P.C.

1 all right, but --

2 A I don't know, letters --

3 Q There were certainly communications of
4 different types.

5 A Communications is a -- is a --

6 Q Okay.

7 A Sure.

8 Q All right. And there were medical
9 records, correct?

10 A Of what?

11 Q There were some medical records that were
12 in evidence, do you recall? Including of your
13 finger.

14 A I remember that there was -- there were
15 medical records for my finger. The other medical
16 records may -- I mean, there was Kipper. Yeah, I
17 think a few things were touched on, but the --
18 well, in terms of medical records and such, I think
19 the other side was lacking in some of their medical
20 evidence.

21 Q Was there any witness that you wanted to
22 call that was unable to be called?

1 MR. CHEW: I'm going to instruct the
2 witness not to answer to the extent that requires
3 you to disclose communications between yourself and
4 your counsel.

5 THE WITNESS: Uh-huh.

6 MR. CHEW: The choice of witnesses
7 certainly would be a subject discussed between you
8 and your counsel, so I would instruct you not to
9 answer.

10 THE WITNESS: I'll -- I'll have to go
11 with Ben's suggestion.

12 MS. CHARLSON BREDEHOFT: All right. So
13 you're instructing him not to answer on the basis
14 of attorney-client privilege?

15 MR. CHEW: Yes, the choice of witnesses
16 would be -- I wasn't counsel --

17 MS. CHARLSON BREDEHOFT: I wasn't asking
18 for choice of witnesses. I was asking if there was
19 anyone that he wanted to call that was not called,
20 in other words, that wouldn't come, that was
21 unavailable, you know, was sick, anything that he
22 wanted but was not available to present.

1 MR. CHEW: Well, I would still instruct
2 you not to answer to the extent this was --
3 entailed communications between you and your
4 counsel in the U.K. If you can answer it without
5 that, you can answer it, but that would be
6 something that would normally be the subject
7 between attorney-client.

8 THE WITNESS: I don't think that I can go
9 into any discussions that I've had with any of my
10 counsel, but I don't recall that there were any
11 witnesses that I wanted, that I was desperate for
12 and we didn't get, no.

13 BY MS. CHARLSON BREDEHOFT:

14 Q Was there any evidence that you wanted to
15 present that you were unable to present for any
16 reason?

17 MR. CHEW: And again, I would instruct
18 the witness not to answer to the extent it would
19 require him to disclose communications between
20 himself and counsel. If you can't answer the
21 question without disclosing attorney-client
22 communications, you should not answer the question.

1 A The fact is I can't, as it would be
2 breaching attorney -- attorney-client privilege.
3 Those would have been things that I would discuss
4 with my lawyers, so I don't know how to answer
5 that, or if I can.

6 Q But separate from your attorneys, you
7 can't think of anything you wanted to present but
8 it was unavailable for some reason.

9 MR. CHEW: Same instruction.

10 A Yeah, and I got it, and you're right, I
11 get it, but I don't want to leave you hanging. I
12 can say this. Again, this is from -- just on a
13 personal -- out of personal experience, the -- the
14 protocol and the -- and the way things play out in
15 a U.K. court are at times quite complicated. For
16 example, if something is not brought up by the
17 defending counsel, then the other side -- the
18 plaintiff has no ability to bring -- bring certain
19 things up that have not been discussed before even
20 though they are a part of the case.

21 So that is something that I noticed in
22 the U.K. proceedings. It's very, very different

1 than United States.

2 Q In that context, is there anything you
3 can think of that -- and we've already talked about
4 witnesses, so I'm on evidence.

5 A Uh-huh.

6 Q Is there anything you can think of that
7 you wanted to present evidentiary wise in the High
8 Court that you were unable to?

9 MR. CHEW: And again, instruct the
10 witness not to answer to the extent it requires him
11 to divulge attorney-client privilege, and I also
12 object to the extent the question purports to call
13 for legal conclusion.

14 A Yeah, I'll stay with Ben on that one if
15 you don't mind.

16 Q So you can't answer it outside of
17 whatever your counsel may have --

18 A I don't think so. I think it would -- it
19 would -- I would have to step into this arena of
20 attorney-client privilege, and I don't see any
21 other way to even try to speak without -- without
22 breaching that, so --

1 Q So outside of communications with
2 counsel, you cannot think of any evidence that you
3 would have liked to --

4 MR. CHEW: Objection, asked and --
5 BY MS. CHARLSON BREDEHOFT:

6 Q -- present but you were unable to?

7 MR. CHEW: Asked and answered, but you
8 may answer again.

9 THE WITNESS: I think unfortunately, it
10 would require me to -- to have to -- even if I had
11 to dip my toe into the attorney-client privilege,
12 it would -- it would -- that would be -- if I were
13 -- if I were to answer the question fully, it would
14 definitely require me to -- to breach that.

15 MR. CHEW: Now a time for lunch?

16 MS. CHARLSON BREDEHOFT: Yeah, we can do
17 that, sure.

18 THE WITNESS: You're just looking for
19 cookies aren't you?

20 MR. CHEW: I am. You've got me again.

21 THE VIDEOGRAPHER: We are going off the
22 record. The time is 13:11.

1 question, argumentative.

2 A Yes, I understood it pretty well.

3 Q And the opinion, the judgment found that
4 the statements that were made in Mr. Wootton's
5 article that's Deposition Exhibit Number 8 were
6 substantially true. Do you recall that?

7 A Based on probabilities I believe is how
8 the judge put it. Is that not correct? I think it
9 is. The probability is -- I believe is how he
10 phrased it.

11 Q Do you remember him finding that the
12 statements were, quote, substantially true, end of
13 quote?

14 MR. CHEW: Objection to the form of the
15 question, argumentative. The document speaks for
16 itself.

17 A Res ipsa loquitur. I -- if he finds that
18 substantially true, then he finds that
19 substantially true. That's one man's opinion, and
20 he's entitled to that.

21 Q Well, it's not just one man's opinion,
22 right? This is a judge in a court that you

1 geez, what's the word count and all that? I don't
2 need it. It's now -- this -- is it public, this
3 right here, his -- his decision?

4 Q You don't get to ask me a question, but I
5 did ask you, you're aware that it's public.

6 A Ah, that's a good --

7 Q So --

8 A Well --

9 Q If it had been in your favor, you
10 would've agreed with him and thought he was right
11 and have been thrilled with his decision, wouldn't
12 you?

13 MR. CHEW: Objection to the form of the
14 question, calls for speculation, but you may
15 answer.

16 BY MS. CHARLSON BREDEHOFT:

17 Q You would have believed you were
18 vindicated, would you not?

19 MR. CHEW: Objection to the form of the
20 question. It's a hypothetical question to a fact
21 witness.

22 A I'm going to say the same thing that I

1 did yesterday to you, and I hope -- I hope this
2 makes sense. Whether Justice Nicol saw things in
3 favor of my case against The Sun or not, whether
4 this case, wherever this may land us, let's say, if
5 -- if I won every case, if I won every little
6 trinket or whatever, I still will lose -- I've
7 still lost, and that started April 22nd and then
8 the last time I saw her in May or whatever it was
9 or --

10 Q 2016.

11 A Somewhere. I've still lost, you
12 understand, because I will carry this with me,
13 baggage, the baggage of it, the accusations.
14 Whether I win or whether I'm deemed some kind of
15 horrible creature that should be locked in a jail
16 cell or in a tomb or whether I'm king of the
17 universe, I've lost. I've already lost by the
18 damage done. So my continuing my search for the
19 truth, my continuing to demand the truth is not for
20 me to win, but it's for the people out there, the
21 women, the victims of this type of thing who are
22 not believed, who are being lied to by your client

1 pretending to be some new messiah of the women's
2 movement. She is a fraud. Anything else? So if I
3 can help other people by continuing, I certainly
4 will now.

5 MR. CHEW: This is 11? Thank you.

6 (Deposition Exhibit Number 11 was marked
7 for identification.)

8 THE WITNESS: Thank you.

9 BY MS. CHARLSON BREDEHOFT:

10 Q I want to show you what has been marked
11 as Deposition Exhibit Number 11, and this is an
12 article in February 2019 talking about a lawsuit
13 that was brought in May of 2018 by two of your body
14 guards, Eugene Arreola and Miguel Sanchez.

15 A Yes, ma'am.

16 Q Do you see that?

17 A Yes, ma'am.

18 Q And if you could move down to the bottom
19 of the first page, this is an article about it from
20 Blumenthal et cetera. BNBD is easier than saying
21 all those names.

22 MR. CHEW: And De Blouw.

1 CERTIFICATE OF SHORTHAND REPORTER - NOTARY PUBLIC
2 I, Karen Young, the officer before whom
3 the foregoing deposition was taken, do hereby
4 certify that the foregoing transcript is a true and
5 correct record of the testimony given; that said
6 testimony was taken by me stenographically and
7 thereafter reduced to typewriting under my
8 direction, and that I am neither counsel for or
9 related to, nor employed by any of the parties to
10 this case and have no interest, financial or
11 otherwise, in its outcome.

12 IN WITNESS WHEREOF, I have hereunto set
13 my hand and affixed my notarial seal this 22nd day
14 of November, 2020.



17 NOTARY PUBLIC IN AND FOR
18 THE COMMONWEALTH OF VIRGINIA

19
20 My commission expires:

21 June 30, 2022

22 Registration No. 7046852

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V I R G I N I A:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

----- x

JOHN C. DEPP, II, :

Plaintiff, :

v. : Case No.

AMBER LAURA HEARD, : CL-2019-0002911

Defendant. :

----- x

Continued Videotaped Deposition of JOHN C. DEPP, II

Reston, Virginia

Thursday, November 12, 2020

9:46 a.m.

Volume 3

CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER

Job No. 328740

Pages 572 - 855

Reported by: Karen Young



5

Conducted on November 12, 2020

<p style="text-align: right;">600</p> <p>1 and made. So Jack has been, yeah, integral and 2 very important. 3 Q Jack Whigham moved to another agency 4 recently; is that correct? 5 A Yes, he did. 6 Q And do you know the name of the new 7 agency? 8 A No, I don't. 9 Q Are you still with him even though he has 10 moved? 11 A I will definitely go with Jack, yes, of 12 course. 13 Q That just hasn't come up yet for you? 14 A No, as far as I'm concerned, Jack Whigham 15 is my agent whether he's at CAA or not, he's my 16 film agent. At present, it's entirely normal and 17 possible that Christian Carino could remain my 18 commercial agent, as they say, in CAA. 19 Q And what role does Bryan Lourd play? 20 A Bryan Lourd is the -- he's the head of 21 CAA. He's the chairman I suppose, chairman of CAA. 22 Q Does he do anything personally for you</p>	<p style="text-align: right;">602</p> <p>1 Mandel situation, and though Jake Bloom's thing was 2 coming out as -- it wasn't looking great, I waited 3 because I -- because I loved Jake Bloom in many 4 ways, and I couldn't bring myself to believe that 5 he would have done that to me, though when it came 6 to light, yes, Adam Waldman started with me 7 basically around then as an outside Hollywood 8 attorney, which I did not want a Hollywood 9 attorney. 10 MR. CHEW: And Mr. Depp, these questions 11 are fine, but I just want to -- 12 THE WITNESS: Remind me that -- 13 MR. CHEW: -- advise you -- 14 THE WITNESS: Yes. 15 MR. CHEW: -- that when Adam became your 16 attorney, your communications are 100 percent -- 17 THE WITNESS: Of course. 18 MR. CHEW: -- privileged. 19 THE WITNESS: Of course. Thank you. 20 BY MS. CHARLSON BREDEHOFT: 21 Q Who recommended Adam Waldman to you? 22 A It was kind of a -- it was a guy that I'd</p>
<p style="text-align: right;">601</p> <p>1 with your career? 2 A Bryan Lourd? 3 Q Yes. 4 A No, not very much, no. 5 Q Okay. When did you first meet Adam 6 Waldman? 7 A First met Adam Waldman, was it 2016? I'm 8 thinking. 9 Q Was it in the time frame of Tracey Jacobs 10 -- the Tracey Jacobs switch, was it around that 11 same time frame? 12 A I can't remember if Tracey was still in 13 my life at that moment. I believe that she was 14 not, and I met Adam with Ed White, at Ed White's 15 house, and -- 16 Q Did Ed White introduce you to Adam 17 Waldman? 18 A Adam Waldman was someone that was brought 19 up -- his name was brought up as a -- as a very 20 capable and brilliant attorney, and he was someone 21 that I wanted to talk with regarding the Mandel 22 situation at that time, first and foremost, the</p>	<p style="text-align: right;">603</p> <p>1 met who turned out to be a very, very sweet man who 2 understood my dilemma and felt that I was being 3 dealt a dirty hand, and he recommended someone 4 named Adam Waldman and -- 5 Q What's the name of that man that 6 recommended him? 7 A He was like a -- it was an attorney in 8 the U.K. that I'd met. 9 Q You don't recall his name? 10 A No, I don't. I don't recall his name. 11 Q So how is it that you ended up meeting 12 Adam Waldman at Ed White's house? 13 A I requested to meet with Mr. Waldman. I 14 believe it was Ed White who facilitated that 15 meeting because there was a dinner held at Ed 16 White's house. 17 Q Had Ed White worked with Adam Waldman 18 before? 19 A I don't believe so, no. 20 Q Okay. So do you recall when you first 21 hired Adam Waldman? 22 A Well, after -- after our first discussion</p>

Conducted on November 12, 2020

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1 **and after he -- he had received enough information**
 2 **on the case and enough -- enough facts, he gave it**
 3 **some thought and then he got back to me on his --**
 4 **what he felt I had to -- what he felt was the right**
 5 **thing to do.**
 6 Q Do you remember approximately when this
 7 was?
 8 A **I mean --**
 9 Q Are we still in 2016 or are we --
 10 A **Yes, I believe we're still in 2016, yes.**
 11 Q All right.
 12 A **It wasn't long after that that I -- once**
 13 **I discussed the case with Mr. Waldman, I felt that**
 14 **he was the man for the -- for the job.**
 15 Q And is this before or after you resolved,
 16 for lack of a better word, your divorce with Amber
 17 that you met Mr. Waldman?
 18 A **Oh, boy. Oh, before we broke up or**
 19 **before the divorce?**
 20 Q Before the August settlement. August
 21 2016 is when you reached the settlement.
 22 A **That's the settlement, okay, so it was**

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1 **after.**
 2 Q Okay, so sometime between August 2016 and
 3 the end of 2016 is when you met Adam Waldman and
 4 hired him.
 5 A **I'm going to guess -- I think it was**
 6 **somewhere in the -- I think it was around**
 7 **Octoberish.**
 8 Q All right, and has Adam Waldman worked
 9 for you since that time?
 10 A **Yes, ma'am.**
 11 Q Okay. Consistently?
 12 A **Yes, ma'am.**
 13 Q And you consider him a trusted advisor?
 14 A **Oh, yes, ma'am.**
 15 Q Okay. Is he -- is Adam Waldman
 16 authorized to speak on your behalf?
 17 MR. CHEW: Objection to the form of the
 18 question. It calls for a legal conclusion. It's
 19 also vague as to instance.
 20 A **Instance is very important. Is he**
 21 **allowed to speak on my behalf? Well, of course,**
 22 **there's a yes and a no in there. It depends on the**

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1 **situation, it depends on what -- you know, what's**
 2 **presented.**
 3 Q Is Adam Waldman authorized to speak on
 4 your behalf with respect to your position on Amber
 5 Heard and her statements?
 6 MR. CHEW: Objection. Same objection.
 7 Objection to the form of the question to the extent
 8 it calls for a legal conclusion and to the extent
 9 it depends -- it's vague as to instance.
 10 A **I think -- just --**
 11 Q You know what?
 12 A **Excuse my ignorance. Is that also not**
 13 **privileged?**
 14 MR. CHEW: Yes, any communications you
 15 had with Mr. --
 16 THE WITNESS: I do feel like --
 17 MR. CHEW: Any -- I'll instruct you not
 18 to answer --
 19 THE WITNESS: -- we're entering the arena
 20 of privilege.
 21 MR. CHEW: Yeah, Mr. Depp, I will
 22 definitely instruct you not to answer any questions

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1 about communications you had to or from Adam
 2 Waldman or any of your attorneys.
 3 BY MS. CHARLSON BREDEHOFT:
 4 Q Let me do it this way. I think this
 5 might be the easiest way. When Mr. -- were you
 6 familiar with some requests for admissions that we
 7 served in this case that you filed responses last
 8 Friday to? Let me phrase it a little differently
 9 because based on the look on your face, no.
 10 A **Yes, I was confused, yes.**
 11 Q Okay. We filed a series of what we call
 12 request for admissions, and we attached the
 13 articles that Mr. -- one that you had made
 14 statements in, the GQ article, and then we also
 15 attached the articles in which Mr. Waldman had made
 16 statements. We asked whether those were genuine
 17 and authentic and -- and the specific quotes were
 18 genuine and authentic, and the responses to those
 19 were yes, they were genuine and authentic.
 20 I'm going to go through, because I --
 21 just to make it move as quickly as possible, and
 22 then that way Mr. Chew can, you know, figure -- to

1 after. 10:23:07

2 Q Okay, so sometime between August 2016 and 10:23:07

3 the end of 2016 is when you met Adam Waldman and 10:23:09

4 hired him. 10:23:14

5 A I'm going to guess -- I think it was 10:23:14

6 somewhere in the -- I think it was around 10:23:18

7 Octoberish. 10:23:21

8 Q All right, and has Adam Waldman worked 10:23:22

9 for you since that time? 10:23:27

10 A Yes, ma'am. 10:23:28

11 Q Okay. Consistently? 10:23:29

12 A Yes, ma'am. 10:23:30

13 Q And you consider him a trusted advisor? 10:23:31

14 A Oh, yes, ma'am. 10:23:33

15 Q Okay. Is he -- is Adam Waldman 10:23:34

16 authorized to speak on your behalf? 10:23:38

17 MR. CHEW: Objection to the form of the 10:23:40

18 question. It calls for a legal conclusion. It's 10:23:41

19 also vague as to instance. 10:23:45

20 A Instance is very important. Is he 10:23:50

21 allowed to speak on my behalf? Well, of course, 10:23:54

22 there's a yes and a no in there. It depends on the 10:24:03

1 situation, it depends on what -- you know, what's 10:24:06
2 presented. 10:24:17
3 Q Is Adam Waldman authorized to speak on 10:24:19
4 your behalf with respect to your position on Amber 10:24:21
5 Heard and her statements? 10:24:29
6 MR. CHEW: Objection. Same objection. 10:24:30
7 Objection to the form of the question to the extent 10:24:32
8 it calls for a legal conclusion and to the extent 10:24:34
9 it depends -- it's vague as to instance. 10:24:39
10 A I think -- just -- 10:24:42
11 Q You know what? 10:24:46
12 A Excuse my ignorance. Is that also not 10:24:47
13 privileged? 10:24:51
14 MR. CHEW: Yes, any communications you 10:24:52
15 had with Mr. -- 10:24:53
16 THE WITNESS: I do feel like -- 10:24:54
17 MR. CHEW: Any -- I'll instruct you not 10:24:55
18 to answer -- 10:24:57
19 THE WITNESS: -- we're entering the arena 10:24:57
20 of privilege. 10:24:59
21 MR. CHEW: Yeah, Mr. Depp, I will 10:25:00
22 definitely instruct you not to answer any questions 10:25:02

1 about communications you had to or from Adam 10:25:04
2 Waldman or any of your attorneys. 10:25:07
3 BY MS. CHARLSON BREDEHOFT: 10:25:08
4 Q Let me do it this way. I think this 10:25:08
5 might be the easiest way. When Mr. -- were you 10:25:11
6 familiar with some requests for admissions that we 10:25:23
7 served in this case that you filed responses last 10:25:26
8 Friday to? Let me phrase it a little differently 10:25:30
9 because based on the look on your face, no. 10:25:37
10 A Yes, I was confused, yes. 10:25:40
11 Q Okay. We filed a series of what we call 10:25:42
12 request for admissions, and we attached the 10:25:44
13 articles that Mr. -- one that you had made 10:25:47
14 statements in, the GQ article, and then we also 10:25:52
15 attached the articles in which Mr. Waldman had made 10:25:55
16 statements. We asked whether those were genuine 10:25:58
17 and authentic and -- and the specific quotes were 10:26:01
18 genuine and authentic, and the responses to those 10:26:05
19 were yes, they were genuine and authentic. 10:26:08
20 I'm going to go through, because I -- 10:26:11
21 just to make it move as quickly as possible, and 10:26:14
22 then that way Mr. Chew can, you know, figure -- to 10:26:16

1 help you where you know you want to be instructed 10:26:20
2 or not, I'm just trying to make this as transparent 10:26:23
3 as possible. I'm going to go through and ask you 10:26:26
4 on each of these whether Mr. Waldman was authorized 10:26:28
5 to make these statements, okay? So -- 10:26:31

6 MR. CHEW: And just so you know -- and 10:26:34
7 first of all, it would be helpful if we had the 10:26:36
8 document to which you're referring. Secondly, I 10:26:39
9 will instruct him not to answer any specific 10:26:41
10 question about what he communicated to or from Mr. 10:26:43
11 Waldman, but you can go through this for the 10:26:47
12 record. 10:26:49

13 MS. CHARLSON BREDEHOFT: I'm not going to 10:26:49
14 ask him that so that we don't get into that issue. 10:26:50
15 That's what I'm trying to -- 10:26:54

16 MR. CHEW: Okay. 10:26:54

17 MS. CHARLSON BREDEHOFT: When I say I'm 10:26:55
18 trying to be transparent, I'm literally going 10:26:57
19 through the statements and just saying was Mr. 10:26:59
20 Waldman authorized on your behalf to say X. 10:27:01

21 MR. CHEW: Right, and I will give the 10:27:04
22 appropriate instruction, so please -- 10:27:07

1	MS. CHARLSON BREDEHOFT: That's --	10:27:09
2	MR. CHEW: Please delay your answer.	10:27:09
3	MS. CHARLSON BREDEHOFT: Yeah, that's --	
4	MR. CHEW: I know it's somewhat	10:27:11
5	artificial, but she has to make a record on this.	10:27:12
6	THE WITNESS: Sure thing.	10:27:16
7	BY MS. CHARLSON BREDEHOFT:	10:27:17
8	Q So on April 12, 2019, was Adam Waldman	10:27:17
9	authorized on your behalf to make the quote in page	10:27:25
10	6, accusing Ms. Heard of committing, quote,	10:27:29
11	"Defamation, perjury and filing and receiving a	10:27:34
12	fraudulent temporary restraining order demand with	10:27:38
13	the court," end of quote?	10:27:40
14	MR. CHEW: Mr. Depp, I will instruct you	10:27:42
15	not to answer that question because you cannot do	10:27:43
16	so without disclosing your communications with Adam	10:27:47
17	Waldman.	10:27:51
18	A Thank you, Ben.	10:27:52
19	Q On June -- in June of 2019, was Adam	10:27:52
20	Waldman authorized on your behalf to tell The Blast	10:27:57
21	that, quote, "Ms. Heard continues to defraud her	10:28:00
22	abused hoax victim, Mr. Depp, the Me Too movement	10:28:04

1 she masquerades as the leader of, and other real 10:28:08

2 abuse victims worldwide," end of quote. 10:28:12

3 MR. CHEW: Mr. Depp, I would instruct you 10:28:14

4 not to answer that question on the basis of 10:28:16

5 attorney-client communication. 10:28:17

6 A Indeed. 10:28:19

7 Q On July 2nd, 2019, was Adam Waldman 10:28:20

8 authorized on your behalf to tell The Blast that 10:28:27

9 Ms. Heard, quote, "Went to court with painted on 10:28:30

10 bruises to obtain a temporary restraining order on 10:28:34

11 May 27," end of quote? 10:28:37

12 MR. CHEW: Mr. Depp, I would instruct you 10:28:39

13 not to answer that question based on 10:28:41

14 attorney-client privilege. 10:28:42

15 A Absolutely, Ben. 10:28:44

16 Q So you're -- just for the record, so you 10:28:46

17 are, based on the instructions of your counsel, you 10:28:49

18 are declining to answer each of these questions, 10:28:53

19 correct? I just want to make sure the record is 10:28:55

20 clear. 10:28:57

21 MR. CHEW: Yes, he's going to follow my 10:28:58

22 instruction. 10:29:00

1	A	It seems pointless for me to sit here and	10:29:00
2		go against my counsel -- my counsel's wishes.	10:29:03
3	Q	I wasn't asking you to go against it. I	10:29:09
4		just --	10:29:09
5	MR. CHEW:	He's going to follow the	10:29:09
6		instructions of counsel, as I'm sure Mr. Heard will	10:29:11
7		when her turn comes.	10:29:13
8	MS. CHARLSON BREDEHOFT:	I just want a	10:29:13
9		clear record is all I'm trying to --	10:29:15
10	MR. CHEW:	She's entitled to ask.	10:29:16
11	THE WITNESS:	Oh, no, I --	
12	MR. CHEW:	And I will make an objection	10:29:17
13		to each one. She has to make her record.	10:29:18
14	THE WITNESS:	I get you.	10:29:21
15	BY MS. CHARLSON BREDEHOFT:		10:29:22
16	Q	On July 3, 2019, was Adam Waldman	10:29:22
17		authorized on your behalf to state to People	10:29:27
18		Magazine that, quote, "Ms. Heard's battered face	10:29:32
19		was a hoax," end of quote?	10:29:35
20	MR. CHEW:	I respectfully direct Mr. Depp	10:29:36
21		-- instruct Mr. Depp not to answer that question	10:29:41
22		based on attorney-client privilege.	10:29:43

1	A	Thank you.	10:29:44
2	Q	And you are following your counsel's	10:29:46
3		instructions not to answer, correct?	10:29:48
4	A	Yes, ma'am, I'll follow my counsel's	10:29:49
5		instructions, thank you.	10:29:51
6	Q	Okay. Then on April 8, 2020, was Adam	10:29:52
7		Waldman authorized on your behalf to say, quote,	10:29:59
8		"Amber Heard and her friends in the media use fake	10:30:04
9		sexual violence allegations as both a sword and a	10:30:07
10		shield depending on their needs. They have	10:30:11
11		selected some of her sexual violence hoax facts as	10:30:13
12		the sword, inflicting them on the public and Mr.	10:30:17
13		Depp," end of quote.	10:30:19
14	MR. CHEW:	I would instruct -- you're	10:30:21
15		asking whether he authorized that, and I would	10:30:23
16		instruct him not to answer that question based on	10:30:25
17		attorney-client communication.	10:30:28
18	MS. CHARLSON BREDEHOFT:	And just -- I	10:30:29
19		neglected to say in The Daily Mail in --	10:30:31
20	MR. CHEW:	I apologize, I --	10:30:34
21	MS. CHARLSON BREDEHOFT:	No, no.	
22	MR. CHEW:	I jumped the gun.	10:30:35

1	MS. CHARLSON BREDEHOFT: No, no, that was	10:30:37
2	my fault. So can we just amend that and have the	10:30:37
3	--	
4	MR. CHEW: Sure.	
5	MS. CHARLSON BREDEHOFT: -- same	
6	instruction?	
7	MR. CHEW: Same instruction.	10:30:41
8	BY MS. CHARLSON BREDEHOFT:	10:30:42
9	Q On April 27, 2020, was Adam Waldman	10:30:42
10	authorized on your behalf to tell The Daily Mail	10:30:46
11	that, quote, "Quite simply, this was an ambush, a	10:30:49
12	hoax. They set Mr. Depp up by calling the cops,	10:30:52
13	but the first attempt didn't do the trick. The	10:30:56
14	officers came to the penthouses, thoroughly	10:31:00
15	searched and interviewed and left after seeing no	10:31:00
16	damage to face or property, so Amber and her	10:31:03
17	friends spilled a little wine and roughed the place	10:31:06
18	up, got their stories straight under the direction	10:31:09
19	of a lawyer and publicist and then placed a second	10:31:10
20	call to 911," end of quote.	10:31:12
21	MR. CHEW: I would instruct the witness	10:31:17
22	not to answer the question based on attorney-client	10:31:18

1 privilege. 10:31:22

2 A I'll -- I'll take Ben's advice. Thank 10:31:23

3 you. 10:31:27

4 Q Okay. On June 24, 2020, was Adam Waldman 10:31:28

5 authorized on your behalf to accuse Ms. Heard in 10:31:33

6 The Daily Mail of committing a, quote, "abuse 10:31:38

7 hoax," end of quote, against you? 10:31:41

8 MR. CHEW: And I would instruct Mr. Depp 10:31:43

9 not to answer that question based on 10:31:45

10 attorney-client privilege. 10:31:46

11 THE WITNESS: Thank you, Ben. I will -- 10:31:50

12 I take your advice and I appreciate it. Thank you. 10:31:55

13 MR. CHEW: You're most welcome. 10:31:57

14 MS. CHARLSON BREDEHOFT: And now with 10:31:58

15 respect to each of those that I just asked, I want 10:32:00

16 to just phrase it a little bit differently, but to 10:32:02

17 save time and us having to go through it -- 10:32:06

18 MR. CHEW: Sure. 10:32:09

19 MS. CHARLSON BREDEHOFT: I would just 10:32:09

20 substitute the word "authorized" to was he acting 10:32:11

21 as your agent when he said. Do you want me to go 10:32:14

22 through all of them again and ask that or -- 10:32:18

1 MR. CHEW: I'm going to -- first of all, 10:32:20
2 it would call for a legal conclusion, but I would 10:32:22
3 give the same instruction -- 10:32:24
4 MS. CHARLSON BREDEHOFT: Okay. 10:32:25
5 MR. CHEW: -- for him not to answer -- 10:32:26
6 MS. CHARLSON BREDEHOFT: So -- 10:32:28
7 MR. CHEW: -- whether you're asking as an 10:32:28
8 agent or an attorney. 10:32:30
9 MS. CHARLSON BREDEHOFT: So for the 10:32:31
10 record purposes, we can agree that I was going to 10:32:32
11 go back and then ask for each of those same ones 10:32:34
12 acting as your agent, and you would have instructed 10:32:37
13 him also on attorney-client privilege not to 10:32:40
14 answer, and he would have followed your advice. 10:32:43
15 MR. CHEW: Yes, to spare your time -- 10:32:45
16 THE WITNESS: Yes, indeed. 10:32:48
17 MR. CHEW: Let's do that. 10:32:48
18 MS. CHARLSON BREDEHOFT: Okay. 10:32:49
19 THE WITNESS: The one thing that I am 10:32:49
20 confused about, I'd love to have defined in a way, 10:32:51
21 as an attorney, there's that, but agent -- what -- 10:32:57
22 what is the definition of agent in this -- in this 10:33:04

1	instance? An agent as in Tracey Jacobs, a Jack	10:33:06
2	Whigham or a --	10:33:11
3	MR. CHEW: It's confusing. We can talk	10:33:12
4	--	10:33:14
5	MS. CHARLSON BREDEHOFT: Speaking on your	10:33:14
6	behalf.	10:33:15
7	MR. CHEW: We can talk --	10:33:15
8	THE WITNESS: Okay.	
9	MR. CHEW: -- about it off the record.	10:33:16
10	THE WITNESS: I just didn't know, yeah.	10:33:17
11	MR. CHEW: It's confusing because agent	10:33:18
12	-- an attorney can also be an agent, so it's	10:33:20
13	tricky, but I'll give the instruction just so that	
14	we don't have to --	10:33:24
15	THE WITNESS: It's just -- the one thing	10:33:24
16	is he's not my -- not a -- he's not a talent agent	10:33:26
17	or he's not a --	10:33:31
18	MS. CHARLSON BREDEHOFT: No.	10:33:33
19	THE WITNESS: -- an agent of my -- has	10:33:33
20	anything to do with --	10:33:35
21	MS. CHARLSON BREDEHOFT: And I think Mr.	10:33:35
22	Chew and I knew.	10:33:36

1	THE WITNESS: Okay, yeah.	10:33:37
2	MR. CHEW: It's -- the -- the --	
3	THE WITNESS: This is just my --	10:33:37
4	MR. CHEW: The confusing thing about	10:33:38
5	agent, as you said, agent can be a commercial	10:33:41
6	agent, can be a talent agent, and technically we	10:33:44
7	lawyers can be agents in a different context.	10:33:47
8	THE WITNESS: Of course.	10:33:49
9	MR. CHEW: But I think we're clear on --	10:33:49
10	THE WITNESS: Yeah, I just wanted the	10:33:51
11	context.	10:33:53
12	MR. CHEW: No, it's very -- yeah.	10:33:53
13	THE WITNESS: I need to know the	
14	definition.	
15	MR. CHEW: Context is key. Sorry.	10:33:54
16	MS. CHARLSON BREDEHOFT: But for your	10:33:55
17	purposes, Mr. Chew, just me substituting and asking	10:33:57
18	in each of those questions if Mr. Waldman was	10:34:01
19	acting as Mr. Depp's agent in making those same	10:34:04
20	statements --	10:34:07
21	MR. CHEW: Same instruction not to answer	10:34:08
22	because he was --	10:34:09

1 MS. CHARLSON BREDEHOFT: Attorney-client 10:34:10
2 privilege. 10:34:11
3 MR. CHEW: Attorney-client privilege. 10:34:11
4 BY MS. CHARLSON BREDEHOFT: 10:34:12
5 Q And Mr. Depp, you are following your 10:34:12
6 counsel's instructions with respect to all of that, 10:34:13
7 correct? 10:34:15
8 A Yes, ma'am. Thank you. 10:34:16
9 Q Okay. Do you have a social media team? 10:34:17
10 A No, I have a -- social media's something 10:34:32
11 I've never -- I've never participated in. It 10:34:38
12 wasn't until the Covid pandemic started to hit and 10:34:44
13 then people were stuck in isolation that I -- that 10:34:50
14 I thought if there was ever a time to open an 10:34:57
15 account like an Instagram account to be able to 10:35:02
16 talk directly to the people to try to lighten at 10:35:06
17 least their moment with a couple of posts, this or 10:35:14
18 that, thanking them for various things, that's the 10:35:18
19 first time I've ever had any kind of social -- 10:35:22
20 social media experience, and to be honest, I don't 10:35:27
21 have a team. I have -- there's a woman friend of 10:35:32
22 mine's misses who runs it for me. I myself don't 10:35:38

1	even know how -- I don't see it, I don't know how	10:35:46
2	to log into it. I don't -- I'm not particularly	10:35:50
3	tech savvy, so --	10:35:53
4	Q I'm going to back up for a minute. I	10:35:56
5	forgot to ask one more series on that set of the --	10:35:58
6	MR. CHEW: Okay.	10:36:01
7	BY MS. CHARLSON BREDEHOFT:	10:36:02
8	Q -- counterclaims, and my apologies for	10:36:02
9	the inconvenience.	10:36:06
10	A Sure thing.	10:36:07
11	Q With respect to each of the quotes that I	10:36:07
12	just gave, and to make it easier, beginning with	10:36:09
13	the April 12, 2019 statement to page 6, for each of	10:36:39
14	those statements, do you adopt those statements or	10:36:46
15	have you adopted those statements that Mr. Waldman	10:36:51
16	made?	10:36:55
17	MR. CHEW: I'm going to instruct him not	10:36:55
18	to answer based on attorney-client privilege as to	10:36:57
19	each of the statements that Mr. Waldman made.	10:37:00
20	That's excluding the GQ statement, which I	10:37:02
21	believe's the first one in --	10:37:05
22	MS. CHARLSON BREDEHOFT: Correct.	10:37:06

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<p style="text-align: right;">620</p> <p>1 MR. CHEW: Okay.</p> <p>2 MS. CHARLSON BREDEHOFT: All right.</p> <p>3 MR. CHEW: I think we're clear. I think</p> <p>4 the record's clear on that.</p> <p>5 MS. CHARLSON BREDEHOFT: All right, yeah,</p> <p>6 and it's -- the paragraph where I read these from</p> <p>7 is paragraph 66A through F of the counterclaim.</p> <p>8 MR. CHEW: No, understood. It's a little</p> <p>9 difficult because you haven't provided us a copy,</p> <p>10 but I think we're clear.</p> <p>11 MS. CHARLSON BREDEHOFT: Okay, so that</p> <p>12 same question of do you adopt or have you adopted</p> <p>13 these statements also would be imposing</p> <p>14 attorney-client privilege --</p> <p>15 MR. CHEW: Correct.</p> <p>16 MS. CHARLSON BREDEHOFT: -- and</p> <p>17 instructing him not to answer, correct?</p> <p>18 MR. CHEW: Correct.</p> <p>19 BY MS. CHARLSON BREDEHOFT:</p> <p>20 Q And Mr. Depp, you would not answer based</p> <p>21 on your counsel's direction?</p> <p>22 A That is correct. Thank you.</p>	<p style="text-align: right;">622</p> <p>1 me -- do you have a publicist?</p> <p>2 A I do. I've had a publicist for a number</p> <p>3 of years. I've been with a woman named Robin Baum,</p> <p>4 and -- and --</p> <p>5 Q What does she do for you?</p> <p>6 A Well, that's a good question. Since the</p> <p>7 -- ever since the -- Ms. Heard's allegations and</p> <p>8 accusations and the People Magazine cover and</p> <p>9 reporting me to be a monster and a wife-beater and</p> <p>10 all that, since then, Ms. Baum's work or her</p> <p>11 responsibilities or her representation of me, our</p> <p>12 communication lessened a great deal.</p> <p>13 We did speak a couple of times. I think</p> <p>14 she was overwhelmed -- I think Ms. Baum was</p> <p>15 overwhelmed with the -- with what appeared to be</p> <p>16 the imminent death of me, and therefore, didn't</p> <p>17 really take much -- well, many many many many many</p> <p>18 people in Hollywood were scared to take a stand on</p> <p>19 anyone because it could cost them their livelihood,</p> <p>20 it could cost -- if you back someone who's been</p> <p>21 defined as a ne'er-do-well, you know, I mean, and</p> <p>22 that's a -- it's not enough to say a ne'er-do-well.</p>
<p style="text-align: right;">621</p> <p>1 MR. CHEW: And I assume Ms. Heard will do</p> <p>2 the same at her deposition. She will follow your</p> <p>3 instructions. I don't think I'll ask --</p> <p>4 MS. CHARLSON BREDEHOFT: I was going to</p> <p>5 say, I don't know that I can speak for her just yet</p> <p>6 on that.</p> <p>7 MR. CHEW: No, but I -- I don't think you</p> <p>8 need to ask him that each time.</p> <p>9 MS. CHARLSON BREDEHOFT: Oh, you know, it</p> <p>10 depends -- depends upon the judge, but some of them</p> <p>11 require that on the record. That's -- that's why.</p> <p>12 MR. CHEW: I think Mr. Depp is going to</p> <p>13 follow my instructions, right or wrong.</p> <p>14 MS. CHARLSON BREDEHOFT: Okay, great.</p> <p>15 MR. CHEW: So the house will fall upon me</p> <p>16 and not upon him.</p> <p>17 BY MS. CHARLSON BREDEHOFT:</p> <p>18 Q That makes it -- that makes it easier,</p> <p>19 okay. So let me go back to the social media, and I</p> <p>20 apologize for --</p> <p>21 A Not at all.</p> <p>22 Q -- jumping around a little bit, but let</p>	<p style="text-align: right;">623</p> <p>1 Fear was rampant throughout Hollywood of</p> <p>2 -- you know, people suddenly realize yeah, I like</p> <p>3 Johnny, but you know what? I don't have a dog in</p> <p>4 this race and I don't want to get in trouble and --</p> <p>5 you know, so yeah, I was -- I was not a safe bet,</p> <p>6 or I was not a safe person to represent, let's say.</p> <p>7 Q So is there a point where Ms. Baum</p> <p>8 stopped being your publicist? I'm just a little</p> <p>9 confused.</p> <p>10 A Well, there's a point where she stopped</p> <p>11 being my publicist, but she's still technically my</p> <p>12 publicist because I have not -- I have not, you</p> <p>13 know, relieved her of her duties because she's not</p> <p>14 doing anything, so I just -- she is there if I --</p> <p>15 if I need to call her, but I have had no need to</p> <p>16 call her, as she's not really been involved in any</p> <p>17 of my attempts to get the truth out there into the</p> <p>18 world.</p> <p>19 Q Did you ask Robin Baum to assist you in</p> <p>20 getting your truth out?</p> <p>21 A I asked. I certainly asked her for</p> <p>22 advice and asked her, you know, what is the -- how</p>

1	at my mother lying in a hospital bed as if she were	11:12:20
2	on a deli platter. So things were somewhat	11:12:25
3	difficult in my --	11:12:29
4	Q Do you have a recollection of speaking	11:12:30
5	with Ms. Wasser before your mom died?	11:12:32
6	A I can't say. I don't know.	11:12:35
7	Q Okay. You started to talk about having a	11:12:39
8	person after Covid-19 who did some postings for you	11:12:50
9	I think or -- when I asked questions about social	11:12:57
10	media.	11:13:01
11	A Yes.	11:13:02
12	Q Do you still have that person? Is that	11:13:02
13	person still working for you?	11:13:04
14	A She doesn't work for me. She's a --	11:13:05
15	she's the wife of a friend of mine, a dear friend	11:13:09
16	of mine.	11:13:13
17	Q Is this Gina Deuters?	11:13:14
18	A It is indeed, yes.	11:13:16
19	Q Have you paid Gina Deuters to perform any	11:13:17
20	services for you relating to social media?	11:13:21
21	A No, ma'am.	11:13:23
22	Q She's just doing this because --	11:13:24

1 A She's a friend.

11:13:27

2 Q As a friend and because Mr. Deuters is
3 your partner and works with you.

11:13:28

11:13:31

4 MR. CHEW: Objection, form of the
5 question, argumentative, but you may answer.

11:13:33

11:13:34

6 BY MS. CHARLSON BREDEHOFT:

11:13:38

7 Q She's married to Stephen Deuters, right?

11:13:38

8 A Right, but the way you're turning it, you
9 want to make it sound like it's an obligation that
10 she must do it. She offered to do it as my friend.

11:13:41

11:13:44

11 She has not asked for money. Mr. Deuters didn't
12 come to me and say hey, can you give my wife a gig.

11:13:47

11:13:51

13 It was actually quite a sweet -- sweet thing --
14 sweet offer because I don't know how to do that
15 stuff. I don't know how to get on to that.

11:13:54

11:13:58

16 Q What exactly did Gina Deuters offer to
17 do?

11:14:05

11:14:07

11:14:09

11:14:12

18 A Whenever I wanted something posted, all I
19 have to do is create the content, and then she can
20 -- she knows how to get on to the Instagram
21 account, which I don't, and then she can post it.
22 So she will post whatever content I would like to

11:14:12

11:14:20

11:14:28

11:14:33

11:14:36

1 give to the people.

11:14:41

2 Q So did Gina Deuters actually create your
3 Instagram account too for you?

11:14:42

11:14:47

4 A No, she did not.

11:14:49

5 Q Who did?

11:14:51

6 A I don't -- I don't even know. It was
7 just sort of a request to the various -- you know,
8 various partners in my work and, you know, beyond
9 -- from Deuters to others, I don't know who
10 actually set up the account and did all the work to
11 do that, but it was something that I thought was
12 important at the time of Covid, to be able to send
13 messages to people's homes who have been, you know,
14 in isolation for months already.

11:14:52

11:14:56

11:15:01

11:15:07

11:15:14

11:15:18

11:15:22

11:15:27

11:15:34

15 Q So sometimes after -- sometime after
16 Covid started is when you first asked to have an
17 Instagram account?

11:15:36

11:15:39

11:15:44

18 A That's the only time I thought it was
19 ever a necessary tool.

11:15:45

11:15:47

20 Q So you didn't have one before Covid?

11:15:52

21 A No, never.

11:15:54

22 Q And when we're talking about Covid,

11:15:55

1 approximately when did you start the Instagram

11:15:57

2 account?

11:16:01

3 A Oh, I'm going to say it's March. I had
4 just made it out of London before the shut-down and
5 got back to the south of France just in time.

11:16:01

11:16:04

11:16:10

6 Q Okay. And who did you tell to create
7 this? You said you got various partners, you
8 requested various partners.

11:16:14

11:16:20

11:16:23

9 A Well, it's sort of -- you know, it's kind
10 of if you're sitting around with your -- a couple
11 of pals and you say you know, I think it's -- this
12 is the first time I've ever even toyed with
13 the idea of having any kind of social media
14 presence. I don't -- that stuff's a mystery to me,
15 so I thought, as it is a way to have a direct
16 communication with the people themselves, and the
17 people are my bosses and they're my employers, I
18 thought it would be a good opportunity to be able
19 to do whatever bit I could do. If I could do a
20 little skit and make people smile or laugh, great.
21 If I could give them my feelings and some support,
22 help them get through it, that's what it was for,

11:16:24

11:16:27

11:16:31

11:16:37

11:16:42

11:16:46

11:16:52

11:16:58

11:17:01

11:17:06

11:17:08

11:17:14

11:17:18

11:17:26

1 and that's still what it's for. 11:17:29

2 Q So who were the people that were in -- 11:17:31
3 I'm trying to figure out who set it up for you. 11:17:33

4 A I don't know. 11:17:37

5 Q How can -- how would -- where would we be 11:17:38
6 able to look to find out who set up your Instagram 11:17:40
7 account? 11:17:44

8 A I would say the man to ask for that is Ed 11:17:44
9 White. 11:17:47

10 Q Because he would have paid for it, right? 11:17:47

11 A Oh, I think, yeah, at the end of the day, 11:17:49
12 everything's going to come back to Ed. 11:17:51

13 Q Did you discuss setting up the Instagram 11:17:55
14 account with Adam Waldman? 11:17:59

15 MR. CHEW: You may answer that yes or no. 11:18:00

16 THE WITNESS: I can answer that? 11:18:03

17 MR. CHEW: You can answer yes or no. You 11:18:05
18 shouldn't disclose your communications with Mr. 11:18:07
19 Waldman. 11:18:10

20 THE WITNESS: Oh, I see, so yes, of 11:18:11

21 course, yes. 11:18:13

22 BY MS. CHARLSON BREDEHOFT: 11:18:14

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1 **and that's still what it's for.**
 2 Q So who were the people that were in --
 3 I'm trying to figure out who set it up for you.
 4 **A I don't know.**
 5 Q How can -- how would -- where would we be
 6 able to look to find out who set up your Instagram
 7 account?
 8 **A I would say the man to ask for that is Ed**
 9 **White.**
 10 Q Because he would have paid for it, right?
 11 **A Oh, I think, yeah, at the end of the day,**
 12 **everything's going to come back to Ed.**
 13 Q Did you discuss setting up the Instagram
 14 account with Adam Waldman?
 15 MR. CHEW: You may answer that yes or no.
 16 THE WITNESS: I can answer that?
 17 MR. CHEW: You can answer yes or no. You
 18 shouldn't disclose your communications with Mr.
 19 Waldman.
 20 THE WITNESS: Oh, I see, so yes, of
 21 course, yes.
 22 BY MS. CHARLSON BREDEHOFT:

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1 Q Do you -- with the Instagram account, do
 2 you have any Twitter account?
 3 **A No.**
 4 Q Have you ever Tweeted?
 5 **A I've never Tweeted in my life.**
 6 Q Have you ever accessed somebody's Twitter
 7 account to read other people's Tweets?
 8 **A No, ma'am, I don't -- I don't read -- I**
 9 **don't read things in newspapers, I don't -- I don't**
 10 **-- I don't -- I don't know what Twitter or Tweeter**
 11 **is.**
 12 Q Okay.
 13 **A I'm --**
 14 Q Do you have a Facebook account?
 15 **A No.**
 16 Q Do you have any other kind of -- other
 17 than the Instagram, do you have any other kind of
 18 social media account?
 19 **A I mean, I have the ability to text and**
 20 **send e-mails, and that's -- that's about as far as**
 21 **I can get with a computer.**
 22 Q Okay. So other than the conversation

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1 that you told me -- or conversations you had with
 2 Ms. Baum, Robin Baum, about how to deal with the
 3 publicity after the obtaining of the temporary
 4 restraining order, did you speak with anyone about
 5 how to -- how to handle in the press and in the
 6 public this type of situation?
 7 MR. CHEW: Objection to the form of the
 8 question.
 9 MS. CHARLSON BREDEHOFT: You know, I
 10 asked it pretty terribly. I agree with you, so let
 11 me ask --
 12 MR. CHEW: I didn't say it was terrible.
 13 I was just going to say it was ambiguous.
 14 MS. CHARLSON BREDEHOFT: It was nice of
 15 you to use restraint on that one. I appreciate
 16 that, Ben.
 17 MR. CHEW: Thank you.
 18 BY MS. CHARLSON BREDEHOFT:
 19 Q I think we've established that Ms. Baum
 20 hasn't done anything for you by way of publicity
 21 since May 27, 2016, correct?
 22 **A That's safe, yeah, to say.**

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1 Q Has anyone else done anything for you by
 2 way of publicity since May 27, 2016?
 3 **A No, that's really the job of the**
 4 **publicist. When -- yeah, when you're -- when**
 5 **you're not particularly allowed in the door to**
 6 **discuss that kind of thing and you know that the**
 7 **person that you should be discussing it with has a**
 8 **bad case of the fear because of the situation,**
 9 **anything that I wanted to say I couldn't say so I**
 10 **didn't say for a very long time.**
 11 **I kept stum, as it were. I kept my mouth**
 12 **closed because I would rather -- it was my feeling**
 13 **that I would rather just continue to take the hits**
 14 **and then deal with them when I got -- when it got**
 15 **to a point where you could deal with a lot, as**
 16 **opposed to it becoming a he said she said. I was**
 17 **not remotely interested in a he said she said or**
 18 **any kind of contest about it. I wanted the truth**
 19 **out there, and my truth was not going to be heard**
 20 **by the mainstream media, so I went on tour, kept my**
 21 **mouth shut and did that for quite a long time.**
 22 Q And then you filed the lawsuit against

1	rely on my counsel to alert me to those -- those	12:41:06
2	things.	12:41:12
3	Q And do you understand in this lawsuit,	12:41:12
4	you have the burden of proof to prove that it's	12:41:15
5	false?	12:41:20
6	A All right.	12:41:21
7	Q Do you understand that?	12:41:21
8	MR. CHEW: Objection to the form of the	12:41:23
9	question to the extent -- well, clearly it calls	12:41:24
10	for a legal conclusion.	12:41:27
11	A The burden of proof is on me to prove	12:41:28
12	that it's false. Well --	12:41:34
13	Q I'm just asking if you understand that.	12:41:38
14	A I walk into this case with what I walked	12:41:41
15	into the other case with, and that's the truth, and	12:41:45
16	the outcome is the outcome is the outcome. I can't	12:41:47
17	-- I have nothing to do with that. I can only	12:41:51
18	speak my truth and hope that justice will in fact	12:41:57
19	prove that Ms. Heard was not ever touched, abused	12:42:07
20	by me in any way, shape or form. That's -- that is	12:42:16
21	the truth.	12:42:24
22	Q If you view the decision in the U.K. as	12:42:25

1 an opinion of one man and we go to trial by the 12:42:29
2 jury and the jury decides in favor of Amber Heard, 12:42:34
3 is your decision -- is your position going to be 12:42:39
4 that's the opinion of seven people? 12:42:44

5 MR. CHEW: Objection to the form of the 12:42:46
6 question. It's a hypothetical question to a fact 12:42:47
7 witness and it's argumentative. 12:42:50

8 A No, I'm not going to say that's the 12:42:54
9 opinion of seven people. Listen, it can be the 12:42:56
10 opinion of one man, it can be the opinion of 200 12:43:01
11 people, it can be the opinion of a thousand people, 12:43:04
12 and they could believe that I did do these things, 12:43:07
13 which I did not take part in any of what Ms. Heard 12:43:12
14 accuses me of. It is outright fiction, therefore, 12:43:16
15 I -- I can only hope that people will hear the 12:43:24
16 truth and understand it to be the truth, but I 12:43:28
17 don't think that the -- the young soldiers who were 12:43:33
18 storming the beaches at Normandy -- I don't think 12:43:39
19 they were saying hey, let's have pizza tonight. I 12:43:43
20 think that they knew what they'd gone into. 12:43:48

21 So what I'm saying is if -- if this does 12:43:52
22 come out, the decision in this particular case 12:43:56

1 comes out in Mrs. -- Ms. Heard's favor, then that 12:44:03
2 is what will happen, but that's not going to make 12:44:07
3 me go oh, my God, I must have done it. Do you 12:44:11
4 understand? 12:44:15

5 Q All right, so you're not going to get 12:44:16
6 what you're seeking anyway. You're not going to 12:44:17
7 get -- 12:44:20

8 MR. CHEW: Object. 12:44:21

9 A I told you already, I can go through this 12:44:21
10 case, and if it's -- if it goes in my favor and the 12:44:24
11 truth is -- it comes out, I think that what that 12:44:30
12 will do will help the people out there, the women 12:44:33
13 out there to -- to not have to listen to someone 12:44:40
14 who's built a foundation, some foundation that they 12:44:55
15 can stand on, a platform, and then use that 12:44:59
16 platform to further their image as this great 12:45:02
17 savior and public speaker and an ambassador to this 12:45:07
18 or that or this or that. Clearly those are her 12:45:11
19 goals, and I -- I am not going to be the 12:45:17
20 springboard that gets her there based on her lies. 12:45:22

21 Q You've asked in your complaint to be 12:45:26
22 awarded all expenses and costs, including 12:45:29

<p>704</p> <p>1 A No.</p> <p>2 Q Did that stop at the same time in around</p> <p>3 October 2018?</p> <p>4 A Yes, right around the time that, yes,</p> <p>5 everything went down with Mr. Bloom.</p> <p>6 Q What was the reason that you stopped the</p> <p>7 relationship with Marty Singer?</p> <p>8 A Marty Singer's essentially Jake Bloom's</p> <p>9 fix-it, henchman.</p> <p>10 Q And I apologize. I said the wrong date.</p> <p>11 I said October 2018. I meant October --</p> <p>12 A Oh.</p> <p>13 Q -- 2016.</p> <p>14 A '16, of course. Sorry. I missed that</p> <p>15 too. Thank you though.</p> <p>16 Q I had asked you a series of questions</p> <p>17 earlier about Adam Waldman, but there were a couple</p> <p>18 more that I needed to -- for the record, and I'm</p> <p>19 anticipating -- wake up, Ben.</p> <p>20 MR. CHEW: I'm awake.</p> <p>21 MS. CHARLSON BREDEHOFT: I'm just teasing</p> <p>22 you.</p>	<p>706</p> <p>1 MR. CHEW: Same instruction not to</p> <p>2 answer, attorney-client privilege.</p> <p>3 BY MS. CHARLSON BREDEHOFT:</p> <p>4 Q Okay. Did Adam Waldman act as your agent</p> <p>5 or with your authority in communicating with the</p> <p>6 press relating to this litigation and to the Sun</p> <p>7 and Wootton litigation?</p> <p>8 MR. CHEW: Instruct Mr. Depp not to</p> <p>9 answer the question.</p> <p>10 MS. CHARLSON BREDEHOFT: On the grounds</p> <p>11 of attorney-client privilege again, right?</p> <p>12 MR. CHEW: Yes.</p> <p>13 MS. CHARLSON BREDEHOFT: I just want to</p> <p>14 make sure.</p> <p>15 MR. CHEW: I'm sorry, yeah, all of these</p> <p>16 are attorney-client privilege.</p> <p>17 THE WITNESS: And I'll of course follow</p> <p>18 Ben's --</p> <p>19 MR. CHEW: Thank you.</p> <p>20 MS. CHARLSON BREDEHOFT: The -- I think</p> <p>21 we raised it off the record, and I just want to</p> <p>22 make another on the record. My understanding was</p>
<p>705</p> <p>1 MR. CHEW: I'm writing my summary.</p> <p>2 BY MS. CHARLSON BREDEHOFT:</p> <p>3 Q So I just want to ask you a few more</p> <p>4 questions here with respect to Adam Waldman. So</p> <p>5 was Adam Waldman acting as your agent or with your</p> <p>6 authority in contacting potential witnesses in this</p> <p>7 litigation?</p> <p>8 MR. CHEW: I would -- I would first</p> <p>9 object because it calls for a legal conclusion, and</p> <p>10 then I would instruct Mr. Depp not to answer</p> <p>11 because that would require disclosing</p> <p>12 attorney-client privilege, so I would instruct you</p> <p>13 not to answer, and he will, as he said earlier,</p> <p>14 follow my instructions.</p> <p>15 A Thank you.</p> <p>16 Q I have like several here, and they're all</p> <p>17 in a row. I just need to put them on the record.</p> <p>18 A Yes, ma'am.</p> <p>19 Q Did Adam Waldman act as your agent or</p> <p>20 with your authority in drafting declarations for</p> <p>21 potential witnesses that had the header from this</p> <p>22 litigation?</p>	<p>707</p> <p>1 that you were going to think more about</p> <p>2 confidentiality of the settlements on the Mandel</p> <p>3 suit and the Brooks -- not the Brooks.</p> <p>4 MR. CHEW: Yes.</p> <p>5 MS. CHARLSON BREDEHOFT: The Mandel suit</p> <p>6 and the --</p> <p>7 MR. CHEW: Yeah, unfortunately --</p> <p>8 MS. CHARLSON BREDEHOFT: Jake --</p> <p>9 MR. CHEW: Unfortunately --</p> <p>10 MS. CHARLSON BREDEHOFT: -- Bloom.</p> <p>11 MR. CHEW: They both have Draconian</p> <p>12 confidentiality provisions.</p> <p>13 MS. CHARLSON BREDEHOFT: And so you're</p> <p>14 instructing him not to answer.</p> <p>15 MR. CHEW: Yes, because doing so would</p> <p>16 subject him and -- well, more importantly him, and</p> <p>17 also me, but more importantly him, to Draconian</p> <p>18 penalties.</p> <p>19 MS. CHARLSON BREDEHOFT: Even though we</p> <p>20 have a protective order.</p> <p>21 MR. CHEW: Despite having a protective</p> <p>22 order.</p>

Conducted on November 12, 2020

<p style="text-align: right;">716</p> <p>1 A -- on the phone with Amber Heard's --</p> <p>2 Q Okay.</p> <p>3 A -- person that we introduced her to so</p> <p>4 that she would understand what a postnup is.</p> <p>5 That's it.</p> <p>6 Q Do you -- did Adam Waldman act as your</p> <p>7 agent or with your authority in any conduct</p> <p>8 associated with computers that related to Amber</p> <p>9 Heard?</p> <p>10 MR. CHEW: I would instruct Mr. Depp not</p> <p>11 to answer on the grounds of attorney-client</p> <p>12 privilege.</p> <p>13 BY MS. CHARLSON BREDEHOFT:</p> <p>14 Q And you are following your counsel's</p> <p>15 instructions, correct?</p> <p>16 A Yes, I'm going to do that. Thank you</p> <p>17 very much.</p> <p>18 Q When did Amber Heard move into the</p> <p>19 penthouse?</p> <p>20 A I don't know exactly the date.</p> <p>21 Q Do you remember the year?</p> <p>22 A I feel like it's maybe 2014 maybe. I</p>	<p style="text-align: right;">718</p> <p>1 wanted to do basically.</p> <p>2 Q So timing wise, were you engaged at the</p> <p>3 time that Amber Heard moved into the penthouse?</p> <p>4 A I don't know if we were officially -- no,</p> <p>5 we weren't officially engaged, no.</p> <p>6 Q When did you get officially engaged?</p> <p>7 A I don't know exactly, but it wasn't that</p> <p>8 early.</p> <p>9 Q When you said officially, is there some</p> <p>10 distinction between engaged and officially engaged?</p> <p>11 A Well, no, I think this just -- I don't</p> <p>12 think if someone is my girlfriend, you know, if the</p> <p>13 word "engaged" comes in, are you obligated to</p> <p>14 change that to my fiancée? Then you get married</p> <p>15 and you're obligated to change it to your wife?</p> <p>16 Why these rules -- she's my girl, I'm her guy, and</p> <p>17 I don't want to think about it -- about something</p> <p>18 as abstract and as beautiful as love in official</p> <p>19 kind of status and names.</p> <p>20 Q You said yesterday I believe that you</p> <p>21 believed that Elon Musk was behind Amber's</p> <p>22 allegations of domestic violence and domestic</p>
<p style="text-align: right;">717</p> <p>1 believe it's somewhere in 2014. Very difficult to</p> <p>2 --</p> <p>3 Q Did you move in at the same time with</p> <p>4 Amber to the penthouse?</p> <p>5 A It was a penthouse that I'd bought years</p> <p>6 before, so I had already taken residence there. It</p> <p>7 was a place that I would go to and stay from time</p> <p>8 to time.</p> <p>9 Q Did you and Amber decorate it for her --</p> <p>10 in preparation for her moving in, redecorate?</p> <p>11 A Well, sure, yes.</p> <p>12 Q Okay, so do you remember approximately</p> <p>13 when that was, when the redecoration took place?</p> <p>14 A Well, I would say from the git-go, she</p> <p>15 had -- she had free rein to choose where -- where</p> <p>16 she wanted to be, where she wanted her things up.</p> <p>17 Of course, all of that would have been done. In</p> <p>18 fact, her -- her decision to use the master bedroom</p> <p>19 and the guest bedroom in penthouse 5 as her shoe</p> <p>20 closet and her clothing closet might have taken me</p> <p>21 a little by surprise, but no, that was all</p> <p>22 provided, and she had a choice of whatever she</p>	<p style="text-align: right;">719</p> <p>1 abuse. Why do you believe that?</p> <p>2 MR. CHEW: Objection to the form of the</p> <p>3 question. I think that mischaracterizes his</p> <p>4 testimony, but you may correct me.</p> <p>5 A I don't know. I don't know that --</p> <p>6 exactly. What you're asking me is -- is far away</p> <p>7 from what I stated. So there is perfect proof that</p> <p>8 the transcript is all of our saving grace, so maybe</p> <p>9 if you want to look back in the transcript and see</p> <p>10 what I said --</p> <p>11 Q Well --</p> <p>12 A -- then that could help you.</p> <p>13 Q Why don't you just tell me what you</p> <p>14 think. Do you think Elon Musk has any -- has any</p> <p>15 role in --</p> <p>16 A Any role?</p> <p>17 Q In Amber Heard's decision to move forward</p> <p>18 with the temporary restraining order against you</p> <p>19 and --</p> <p>20 A I never said that once.</p> <p>21 Q And domestic violence?</p> <p>22 A Never said that once, ma'am.</p>

1 CERTIFICATE OF SHORTHAND REPORTER - NOTARY PUBLIC

2 I, Karen Young, the officer before whom
3 the foregoing deposition was taken, do hereby
4 certify that the foregoing transcript is a true and
5 correct record of the testimony given; that said
6 testimony was taken by me stenographically and
7 thereafter reduced to typewriting under my
8 direction, and that I am neither counsel for or
9 related to, nor employed by any of the parties to
10 this case and have no interest, financial or
11 otherwise, in its outcome.

12 IN WITNESS WHEREOF, I have hereunto set
13 my hand and affixed my notarial seal this 23rd day
14 of November, 2020.

15

16



17

NOTARY PUBLIC IN AND FOR

18

THE COMMONWEALTH OF VIRGINIA

19

20 My commission expires:

21

June 30, 2022

22

Registration No. 7046852



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Transcript of John C. Depp, II, Volume 4

Date: December 14, 2021
Case: Depp, II -v- Heard

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V I R G I N I A:
IN THE CIRCUIT COURT OF FAIRFAX COUNTY
- - - - -x
JOHN C. DEPP, II, :
Plaintiff and :
Counter-Defendant, : Civil Action No.
v. : CL-2019-0002911
AMBER LAURA HEARD, :
Defendant and :
Counter-Plaintiff. :

- - - - -x

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VIDEOTAPED DEPOSITION OF JOHN C. DEPP, II
VOLUME 4
Conducted Virtually
Tuesday, December 14, 2021
9:41 a.m. ET

Job No.: 413766
Pages: 856 - 1022
Reported By: Victoria Lynn Wilson, RMR, CRR

1 CONFIDENTIAL VIDEOTAPED DEPOSITION OF JOHN C.
2 DEPP, II, VOLUME 4, conducted virtually.

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 Pursuant to docketing, before Victoria Lynn
Wilson, Registered Merit Reporter, Certified
Realtime Reporter, E-Notary Public in and for the
State of Maryland.

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A P P E A R A N C E S C O N T I N U E D

ON BEHALF OF THE DEFENDANT:

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CLARISSA PINTADO, ESQUIRE

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ALSO PRESENT:

John Parkman, Videographer

Austin Costello, Planet Depos Remote Tech

1 to not get loaded and continue drinking. That was 12:11:15
2 their little joke. 12:11:20

3 Q How has your use of alcohol and 12:11:21
4 medications and nonprescription illegal or 12:11:27
5 recreational drugs impacted your short-term and 12:11:30
6 long-term memory? 12:11:34

7 MR. CHEW: Objection. Lack of foundation. 12:11:36
8 Argumentative. Assumes facts not in evidence. 12:11:40
9 Calls for expert conclusion. Calls for 12:11:44
10 speculation. 12:11:48

11 A My memory is pretty good. My memory is 12:11:51
12 actually very good. I don't think my cognitive -- 12:11:54
13 cognitive memory is -- I don't think anything has 12:11:56
14 been affected by an overabundance of foreign 12:11:59
15 chemicals into my brain. 12:12:02

16 I think that that has been really -- it's 12:12:06
17 been played out in every act of this sort of 12:12:09
18 Chekhovian -- Chekhovian kind of puppet show that, 12:12:15
19 you know, every incident starts with -- I'm sorry. 12:12:23
20 What? What? I don't even know what I'm talking 12:12:32
21 about now. 12:12:35

22 Q How long -- how long have you been using 12:12:35

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Transcript of John C. Depp, II, Volume 4

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1	that down. Thank you. And if you can bring up	12:45:02
2	Exhibit Number 52?	12:45:07
3	REMOTE TECH: Yes, ma'am. Stand by.	12:45:12
4	(Depp Exhibit 52, previously marked, is	
5	attached to the transcript.)	12:45:32
6	Q Mr. Depp, I'm going to show you what has	12:45:32
7	been marked as Deposition Exhibit Number 52. It	12:45:34
8	is dated March 6th, 2020, and is a disclosure	12:45:38
9	order from the High Court of Justice in London in	12:45:42
10	the UK matter. And I'm going to direct your	12:45:45
11	attention --	
12	MS. BREDEHOFT: If I can take control --	12:45:51
13	there we go. Thank you, Austin.	12:45:53
14	Q -- going to direct your attention to the	12:45:54
15	second page, paragraph one. And it says -- let's	12:45:58
16	see if I can color that. No, I didn't do that	12:46:05
17	very well. "In respect of all recordings, whether	12:46:08
18	made digitally or by any other means, which	12:46:11
19	include the voice of Amber Heard, whether or not	12:46:14
20	they also include the voice of claimant, 'the	12:46:17
21	recordings,' the claimant do by 4:00 p.m. on 10th	12:46:20
22	March 2020 provide a witness statement verified	12:46:25

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Transcript of John C. Depp, II, Volume 4

Conducted on December 14, 2021

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1	with a statement of truth from him personally	12:46:28
2	listing all of the recordings within his control	12:46:31
3	that fall within the scope of CPR 31.6." Do you	12:46:36
4	see that?	12:46:39
5	MR. CHEW: Objection. Lack of foundation.	12:46:41
6	Assumes facts not in evidence.	12:46:43
7	A I see what you're talking about, yeah, I	12:46:47
8	mean I see the paragraph.	12:46:48
9	Q Do you -- do you have a recollection of	12:46:49
10	being asked to provide all of the recordings that	12:46:52
11	you made that include the voice of Amber Heard?	12:46:59
12	MR. CHEW: I would instruct the witness	12:47:04
13	not to answer that question on the -- if you	12:47:06
14	cannot answer that without disclosing	12:47:09
15	attorney-client privilege, and I don't know how he	12:47:11
16	could possibly answer it without disclosing	12:47:13
17	communications you had with your attorneys at	12:47:16
18	Shillings and other -- and perhaps other	12:47:21
19	attorneys.	12:47:27
20	A I mean the one thing that I -- here's the	12:47:27
21	only thing that -- I mean the one thing that I can	12:47:33
22	say is that my devices were given to my	12:47:35

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1 representatives on more than one occasion, and 12:47:45
2 they have everything and have had everything for 12:47:55
3 well over -- well-well over a year now. It's been 12:48:00
4 a couple years. So, there's been -- if you wanted 12:48:04
5 to know, you'd have to ask my attorneys, to be 12:48:12
6 honest. 12:48:17

7 Q Do you recall turning over all of the 12:48:17
8 recordings that you made which include the voice 12:48:21
9 of Amber Heard? 12:48:24

10 MR. CHEW: Objections. Asked and 12:48:26
11 answered. And I would instruct you not to answer 12:48:29
12 to the extent that you can't do so without 12:48:32
13 disclosing communications with your attorneys. 12:48:35

14 A I think that -- no disrespect but I 12:48:38
15 believe -- but I believe you got your -- your -- 12:48:44
16 your answer. 12:48:46

17 Q Now, you said, "over a year ago." Do you 12:48:47
18 recall producing these in the range of March 10, 12:48:51
19 2020? 12:48:57

20 A I have given my devices over long prior to 12:48:57
21 the Sun case, long prior to this case, all the 12:49:05
22 way -- I mean it's been one, two, three -- I don't 12:49:11

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Transcript of John C. Depp, II, Volume 4

Conducted on December 14, 2021

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1 know how many times. My devices have been, 12:49:14
2 whatever, whatever you do. You go through them. 12:49:19
3 You scan them. You do whatever. You get -- so, 12:49:21
4 in terms of specifics, I -- I don't know -- I 12:49:28
5 think the -- the only way to get that information 12:49:35
6 is really from my attorneys. 12:49:38
7 MR. CHEW: Yeah, and I instruct you not to 12:49:39
8 answer that. 12:49:41
9 Ms. Bredehoft, if you'd attended the 12:49:42
10 hearing on December 10, you would know that 12:49:44
11 Mr. Depp is not waiving attorney-client privilege 12:49:46
12 and has not done so and will not do so in future. 12:49:50
13 MS. BREDEHOFT: Austin, can you pull up 12:49:53
14 Depp Number 53, please. 12:49:56
15 REMOTE TECH: Stand by. 12:50:01
16 (Depp Exhibit 53, previously marked, is 12:50:02
17 attached to the transcript.) 12:50:18
18 Q Mr. Depp I'm going to show you what has 12:50:18
19 been marked as Deposition Exhibit Number 53. 12:50:21
20 A Okay. 12:50:24
21 Q It's a portion of -- it's dated March 10, 12:50:24
22 2020, and it's a portion of a second witness 12:50:32

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975

1	statement of Jenny Afia. Do you recognize Jenny	12:50:35
2	Afia's name? Was she counsel for you?	12:50:41
3	A Yes.	12:50:44
4	Q All right. Then I'm going to take you to	12:50:46
5	paragraph 16, and it starts out with, "We are	12:50:52
6	currently in the process of listening to all of	12:51:00
7	the audio and video files which have been	12:51:03
8	extracted from claimant's devices that were	12:51:05
9	supplied to our firm by the claimant's previous	12:51:08
10	solicitors." Do you see that?	12:51:11
11	A It's quite small. If you could make the	12:51:14
12	document larger --	12:51:17
13	Q I sure will. I sure will.	12:51:18
14	A Helpful. Thank you.	12:51:20
15	Q So, what I was just referring to was here.	12:51:21
16	A Yes. Yes.	12:51:25
17	Q Do you see that?	12:51:26
18	A Uh-huh.	12:51:26
19	Q And --	12:51:27
20	A Yes.	12:51:28
21	Q And then it says, "There are in excess of	12:51:29
22	50 files. Of the 50 files so far reviewed, none	12:51:36

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Transcript of John C. Depp, II, Volume 4

Conducted on December 14, 2021

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1	of the documents fall to be -- fail to be	12:51:38
2	disclosed fall to that." I don't know what that	12:51:42
3	means. "In addition" -- this is the part I want	12:51:42
4	to call your attention to -- "In addition to those	12:51:43
5	files, our team extracted more than 15-and-a-half	12:51:46
6	hours of audio recordings that include the voice	12:51:50
7	of Ms. Heard, which a senior lawyer has started to	12:51:53
8	review in order to apply the tests of disclosure	12:51:57
9	pursuant to CPR 31.6." Do you see that?	12:52:01
10	A I do.	12:52:04
11	Q Is it your best recollection that you	12:52:05
12	recorded 15-and-a-half hours of audio recording	12:52:08
13	that included Amber Heard?	12:52:11
14	A Oh, I don't think that I could have stuck	12:52:15
15	it out for 15 hours of recording, no.	12:52:19
16	Q You think it was less than that?	12:52:21
17	A I would -- I would say that it wouldn't	12:52:25
18	come anywhere near that.	12:52:31
19	Q Do you have any explanation for why your	12:52:32
20	attorneys are representing to the court that	12:52:35
21	there's 15-and-a-half hours of audio recordings	12:52:37
22	that include the voice of Ms. Heard?	12:52:40

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Conducted on December 14, 2021

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1	MR. CHEW: Objection. I'm going to	12:52:42
2	instruct the witness not to answer that question	12:52:44
3	because he can't possibly answer that question	12:52:46
4	without disclosing communications with his	12:52:48
5	attorneys. Again, I think you should ask his	12:52:51
6	attorneys.	12:52:54
7	Q Is it your testimony under oath, Mr. Depp,	12:52:57
8	that you did not have in your possession 15-and-a-	12:52:59
9	half hours of audio recordings that include the	12:53:04
10	voice of Ms. Heard?	12:53:07
11	A 15 hours of audio record -- it sounds to	12:53:12
12	me like what is being said is that there are 15-	12:53:26
13	and-a-half hours of audio recordings and that a	12:53:33
14	portion of those audio recordings include the	12:53:40
15	voice of Amber Heard. But I don't believe that	12:53:42
16	there are 15-and-a-half hours of me recording	12:53:45
17	Ms. Heard. There's no way. 15-and-a-half hours?	12:53:51
18	No. It's likely that she has, though.	12:53:58
19	MS. BREDEHOFT: Austin, can you pull up	12:54:02
20	Exhibit 54, please.	12:54:04
21	REMOTE TECH: Stand by.	12:54:09
22	MS. BREDEHOFT: Thank you.	12:54:10

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Transcript of John C. Depp, II, Volume 4

Conducted on December 14, 2021

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1	(Depp Exhibit 54, previously marked, is	12:54:10
2	attached to the transcript.)	12:54:17
3	MS. BREDEHOFT:	12:54:17
4	Q I'm going to show you what -- as soon as	12:54:17
5	he shows it to us --	12:54:20
6	A If there's a pause, it's because the	12:54:28
7	battery dropped dead.	12:54:32
8	Q I'm going to ask you to take a look at	12:54:37
9	Deposition Exhibit Number 54. This is the fourth	12:54:40
10	witness statement of John Christopher Depp, II.	12:54:43
11	That's you; correct?	12:54:46
12	A That is me, yes, ma'am.	12:54:48
13	Q Okay. And --	12:54:49
14	A What's the date on this?	12:54:51
15	Q It's March 12, 2020.	12:54:53
16	A Uh-huh.	12:54:57
17	Q Do you see that?	12:54:58
18	A Yes, ma'am.	12:54:58
19	Q Okay. And then I'm going to scroll down,	12:54:59
20	and I'm going to direct your attention to -- as	12:55:02
21	soon as I can scroll -- paragraph number seven.	12:55:06
22	I'm going to try to make this a little bit larger	12:55:10

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Transcript of John C. Depp, II, Volume 4

Conducted on December 14, 2021

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1	for you.	12:55:14
2	A That's great.	12:55:15
3	Q And it says, "Following this search and	12:55:16
4	analysis, I am advised that all of the recordings	12:55:21
5	which include the voice of Ms. Heard which fall	12:55:24
6	within my control and which fall within the scope	12:55:28
7	of CPR 31.6 are as follows:" And you list two of	12:55:30
8	them there. The first is an audio recording with	12:55:36
9	the file name, and I'm not going to read that,	12:55:39
10	recorded on 26 March 2015 at 11:01:16 p.m. Do you	12:55:42
11	see that?	12:55:49
12	A Uh-huh. I do, ma'am, yes.	12:55:49
13	Q Okay. And then the second one is an audio	12:55:51
14	recording with the file name, and I'm not going to	12:55:54
15	read that, recorded on 4 January 2016 at 2:38 p.m.	12:55:56
16	Do you see that?	12:56:02
17	A 2:38. Yes, I do. Yes, ma'am.	12:56:03
18	Q Okay. Now, were those full audio	12:56:06
19	recordings at that time?	12:56:09
20	A I don't -- I do not know what -- what --	12:56:12
21	what they were exactly.	12:56:16
22	Q Oh.	12:56:18

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1	A It would be hard to say. It's a sort of	12:56:20
2	like trying to keep track of those file numbers,	12:56:22
3	you know.	12:56:25
4	Q All right. Now, on August 14, 2020, you	12:56:25
5	produced in this litigation as Depp Bates stamp	12:56:30
6	number 8259 a partial of this first audio	12:56:35
7	recording. Do you know where the rest of the	12:56:41
8	audio recording is?	12:56:44
9	MR. CHEW: Objection. Argumentative.	12:56:46
10	Lack of foundation. Assumes facts not in	12:56:47
11	evidence.	12:56:50
12	A So, the question is do I know where the	12:56:55
13	beginning of something is, the beginning of an	12:56:58
14	audio recording?	12:56:59
15	Q The full recording.	12:57:00
16	A The full record --	12:57:01
17	Q It's probably a partial. Where is the	12:57:03
18	full recording?	12:57:05
19	MR. CHEW: Again, I'll object.	12:57:05
20	Argumentative. Lack of foundation. Assumes facts	12:57:08
21	not in evidence.	12:57:10
22	A I don't know what the full recording is,	12:57:10

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1	was, or -- so --	12:57:14
2	Q What steps did you take to preserve the	12:57:18
3	full recording?	12:57:21
4	MR. CHEW: Objection. Vague. Ambiguous.	12:57:22
5	He's already answered as to turning over his	12:57:25
6	devices to his counsel. And I would instruct the	12:57:32
7	witness not to answer to the extent that answering	12:57:41
8	would require him to disclose communications with	12:57:44
9	any counsel, present or former.	12:57:47
10	A I'm going to take Mr. Chew's advice.	12:57:57
11	Q So, you cannot answer that question?	12:58:02
12	A Apparently not.	12:58:04
13	Q Did you delete any part of the audio	12:58:06
14	recording recorded on 26 March 2015 at	12:58:10
15	11:01:16 p.m. prior to turning it over to your	12:58:15
16	counsel?	12:58:20
17	A I deleted nothing.	12:58:20
18	Q Okay. And then I'll now ask you, on the	12:58:23
19	second one, did you delete any portion of the	12:58:26
20	audio recording that was recorded on 4	12:58:29
21	January 2016 at 2:38:58 p.m. prior to turning it	12:58:33
22	over to counsel?	12:58:38

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1 MR. CHEW: Argumentative. Objection to 12:58:39
2 the form of the question. Argumentative. Assumes 12:58:41
3 facts not in evidence. 12:58:44

4 But you may answer the question. 12:58:45

5 A Again, I -- I destroyed nothing from any 12:58:47
6 recording. I would -- destroyed no recordings. 12:58:53
7 I -- I destroyed nothing. 12:58:57

8 Q Okay. So, when -- as far as you know, 12:59:00
9 when you turned these two recordings over to your 12:59:02
10 counsel, they were the full recordings; is that 12:59:05
11 correct? 12:59:08

12 A I turned over my devices and counsel took 12:59:08
13 what, I imagine, they -- was necessary. But I 12:59:13
14 don't -- I don't -- I didn't specifically say, 12:59:23
15 "Oh, here's this; here's this; here's this; here's 12:59:25
16 this." That's -- I just gave my devices without, 12:59:27
17 of course -- without even pondering the idea of 12:59:34
18 trying to clean something, I mean because that can 12:59:37
19 always be found and, plus, I don't need to. I 12:59:44
20 don't need to clean anything up. 12:59:47

21 Q All right. Now, as of 12 March 2020, had 12:59:48
22 you turned these devices over to your counsel that 12:59:54

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1	included these two audio recordings?	12:59:56
2	MR. CHEW: Objection. Asked and answered.	13:00:00
3	A Those audio recordings were included in	13:00:07
4	the -- if they were in my devices --	13:00:11
5	Q Okay.	13:00:16
6	A -- then they got -- then they were sent to	13:00:16
7	all counsel, all my counsel.	13:00:19
8	Q Now, in the two files that were turned	13:00:21
9	over in this litigation, the first of them Depp	13:00:26
10	8259, it has a -- has no file create date and has	13:00:30
11	a last modified date as of August 13, 2020, which	13:00:36
12	is several months after this. Do you know who	13:00:41
13	modified or manipulated the recording as of	13:00:44
14	August 13, 2020?	13:00:47
15	MR. CHEW: Objection. Assumes facts not	13:00:51
16	in evidence. Lack of foundation. Unintelligible.	13:00:52
17	A I don't know anything about anyone	13:00:58
18	deleting anything.	13:01:01
19	Q Do you know where the missing metadata is	13:01:03
20	on creating the file?	13:01:06
21	MR. CHEW: Objection. Assumes facts not	13:01:08
22	in evidence. Argumentative. Lack of foundation.	13:01:10

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1	Calls for speculation.	13:01:12
2	A No, I don't -- I don't know anything	13:01:17
3	about -- as far as I've ever known, if you take a	13:01:22
4	photograph, if you do -- if you make a recording,	13:01:26
5	whatever, the metadata will automatically record	13:01:28
6	itself and be there to -- to access. And there	13:01:34
7	shouldn't be any problem accessing any of the	13:01:41
8	metadata because I'm not as -- I'm not computer	13:01:44
9	literate enough to really go in and know what --	13:01:48
10	much about metadata.	13:01:51
11	Q Do you know who leaked a partial recording	13:01:53
12	to The Daily Mail of this audio recording	13:01:58
13	identified in paragraph 7A of Exhibit Number 55 --	13:02:02
14	54?	13:02:11
15	MR. CHEW: Objection. Argumentative.	13:02:11
16	Lack of foundation. Assumes facts not in	13:02:13
17	evidence. Calls for speculation.	13:02:16
18	A I -- I don't quite know exactly what	13:02:22
19	you're asking.	13:02:28
20	Q So, a partial of the audio recording that	13:02:30
21	was recorded on 26 March 2015, which you've	13:02:34
22	identified in paragraph 7A of your witness	13:02:38

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1 statement, was leaked to The Daily Mail. Do you 13:02:43
2 know who did that? 13:02:46
3 MR. CHEW: Objection. Assumes facts not 13:02:48
4 in evidence. Facts -- assumes facts that aren't 13:02:50
5 true. Lack of foundation. 13:02:56
6 A I -- I don't know -- 13:03:02
7 Q Did you leak it?
8 A -- of anyone who would have touched the 13:03:10
9 metadata. I don't know of anyone who would 13:03:16
10 have -- of -- of -- 13:03:20
11 Q Mr. Depp, I'm asking you -- 13:03:23
12 A -- pulled anything out or partialized 13:03:25
13 something. 13:03:28
14 Q I'm asking you a different question. Do 13:03:28
15 you know who provided a partial recording of the 13:03:30
16 audio recording from 26 March 2015 to The Daily 13:03:34
17 Mail? 13:03:39
18 MR. CHEW: Objection. Assumes facts not 13:03:39
19 in evidence. Lack of foundation. 13:03:41
20 A You're -- you're asking me something 13:03:46
21 that -- I don't know that the answer you're going 13:03:51
22 to receive from me is going to be -- 13:03:54

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1	Q I'm asking if you know. If you don't	13:03:57
2	know, then the answer is no, you don't know.	13:03:59
3	A Well, I --	13:04:01
4	Q Do you know?	13:04:02
5	MR. CHEW: And, again, I would object.	13:04:03
6	You're just making assertions. You're assuming	13:04:04
7	facts that aren't in evidence without any	13:04:07
8	foundation. So, I -- I --	13:04:10
9	A Which doesn't make it any easier for me to	13:04:14
10	understand what you're talking about.	13:04:17
11	Q Let me ask you this: Did you leak a	13:04:18
12	partial recording of the 26 March 2015 audio	13:04:21
13	recording that you've identified in paragraph 7A	13:04:26
14	of your witness statement to The Daily Mail?	13:04:28
15	A Did I --	13:04:31
16	MR. CHEW: Objection. Argumentative.	13:04:32
17	Lack of foundation. Assumes facts not in	13:04:33
18	evidence. Contradicts the witness statements	13:04:36
19	you're directing him to.	13:04:41
20	A You want to figure out how to -- how do	13:04:47
21	we -- how we get through this with her or I don't	13:04:49
22	know --	13:04:52

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1	Q I asked you whether you did. Did you leak	13:04:52
2	or not?	13:04:54
3	A I was just discussing something with my	13:04:56
4	attorney. His name is Ben Chew.	13:04:58
5	MR. CHEW: It's vague. I mean object on	13:05:02
6	the ground it's vague. Do you understand what	13:05:03
7	she's asking you?	13:05:05
8	A Well --	13:05:07
9	MR. CHEW: If you don't, then you can't	13:05:07
10	answer it.	13:05:09
11	MS. BREDEHOFT: I object to your coaching,	13:05:10
12	Ben. It's a very simple question.	13:05:13
13	MR. CHEW: I'm not coaching. You're just	13:05:14
14	asking really bad questions and wasting a lot of	13:05:16
15	time.	13:05:18
16	A Are you -- are you asking me a question?	13:05:21
17	Are you insinuating as you ask the question? Are	13:05:23
18	you asking about me? Are you asking about someone	13:05:25
19	else? Are you saying that I made the tape partial	13:05:28
20	prior to? Are you -- who -- because the --	13:05:34
21	everything went to my attorneys. All the devices,	13:05:37
22	all the information, so if something ended up	13:05:42

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1	partial, I don't know. If something ended up not	13:05:45
2	to your liking, I don't know.	13:05:49
3	Q Did Adam Waldman represent you as of 20	13:05:53
4	March 2020?	13:05:59
5	A I think -- I think we might be getting	13:06:01
6	into something that's attorney-client privilege,	13:06:04
7	and I -- didn't the judge also just recently find	13:06:06
8	that kind of an unpleasant thing for you to be --	13:06:12
9	MR. CHEW: I would -- I would instruct the	13:06:16
10	witness not to answer any questions about any	13:06:17
11	communications between you and Adam Waldman, who	13:06:20
12	Ms. Bredehoft knows better than anybody is one of	13:06:23
13	your counsel. So, I instruct you not to answer	13:06:27
14	and we can move on.	13:06:29
15	Q Well -- well, we've got to move backwards.	13:06:32
16	A I'm invoking attorney-client privilege.	13:06:34
17	Q Mr. Depp, I'm going to ask you one more	13:06:35
18	time. Did you provide a partial audio recording	13:06:38
19	of the 26 March 2015 audio recording that you've	13:06:41
20	identified as paragraph -- in paragraph 7A of your	13:06:46
21	witness statement to The Daily Mail? Yes or no,	13:06:50
22	did you provide it to them?	13:06:53

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1	A My devices were given to my attorneys.	13:06:55
2	Q That's not the question I'm asking you.	13:07:02
3	Did you give a partial of the audio recording to	13:07:04
4	The Daily Mail?	13:07:07
5	A Did I personally give an audio recording	13:07:09
6	to anyone? No.	13:07:11
7	Q Do you know who did?	13:07:13
8	MR. CHEW: No, I'm going to instruct you	13:07:17
9	not to answer that question. You've already --	13:07:18
10	you've already answered the one question she asked	13:07:20
11	that she was entitled to ask. You said you didn't	13:07:23
12	do it. Let's move on.	13:07:25
13	A I think she said -- she's getting -- she's	13:07:27
14	getting into territory where the judge has	13:07:29
15	already -- I think the judge has made an order	13:07:32
16	about --	13:07:35
17	Q Mr. Depp, did you provide --	13:07:36
18	A I'm sorry. I was just talking.	13:07:37
19	Q But you weren't answering the question.	13:07:40
20	Mr. Depp --	
21	A You think that I answered your question	13:07:44
22	wrong --	

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1	Q Mr. Depp --	13:07:45
2	MR. CHEW: (Indecipherable) he did not.	13:07:45
3	Q Mr. Depp, did you provide a partial of the	13:07:46
4	audio recording on 4 January 2016 that you	13:07:49
5	identified in paragraph 7B of your witness	13:07:53
6	statement to The Daily Mail?	13:07:56
7	MR. CHEW: Objection. It assumes facts	13:08:01
8	not in evidence, misstates his testimony, lack of	13:08:03
9	foundation, and contradicts the document, and	13:08:09
10	asked and answered.	13:08:12
11	Q What's your answer?	13:08:19
12	A I told you that's (indecipherable).	13:08:21
13	Q You need to answer the question.	13:08:23
14	MR. CHEW: You may answer the question	13:08:25
15	again if you understand.	13:08:26
16	A Did you -- did you -- maybe you were	13:08:27
17	working up a --	13:08:29
18	Q Are you refusing to answer the question,	13:08:33
19	Mr. Depp?	13:08:34
20	MR. CHEW: No, he already answered the	13:08:35
21	question.	13:08:36
22	MS. BREDEHOFT: No, he didn't, Mr. Chew.	13:08:36

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1	He answered the one that's 7A, not 7B.	13:08:38
2	THE WITNESS: Austin, I know you're the	
3	gentleman -- Vicky, Ms. Wilson, is it possible,	13:08:45
4	are you able to read back --	13:08:48
5	Q No, you don't get to ask that question.	13:08:49
6	A I'm not asking you, ma'am.	13:08:51
7	Q Have you made any effort at all to try to	13:08:53
8	locate the full recordings that you've identified	13:08:56
9	here in paragraph 7A and B of your witness	13:09:00
10	statement?	13:09:03
11	MR. CHEW: Objection. Asked and answered.	13:09:05
12	Lack of foundation. Argumentative. Misstates the	13:09:07
13	document. He said what he did with his devices	13:09:12
14	three or four times.	13:09:17
15	MS. BREDEHOFT: That's not what I'm	13:09:18
16	asking.	13:09:20
17	Q Have you made any effort at all to find	13:09:20
18	out where the full recordings are of the audio	13:09:24
19	recording from 26 March 2015 and the audio	13:09:28
20	recording from 4 January 2016?	13:09:32
21	MR. CHEW: Objection. Argumentative.	13:09:35
22	Lack of foundation. Assumes facts not in	13:09:37

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1 evidence. Assuming partial recordings. 13:09:39

2 A I just looked at a piece of paper that you 13:09:42

3 showed me with these file names on them. You even 13:09:46

4 yourself skipped through the file names because 13:09:51

5 it's a bunch of numbers. You're saying one is 13:09:53

6 partial. Did I make it partial or did I give it? 13:09:57

7 I don't know what these are. 13:10:00

8 So, I don't -- I cannot tell you 13:10:02

9 1,000 percent what these things are, so I cannot 13:10:06

10 answer your questions in any way that's going to 13:10:09

11 please you and make you jump for joy. I can only 13:10:14

12 tell you, as I did say -- 13:10:19

13 Q But the answer is no. The answer is no, 13:10:20

14 you have not made any effort -- 13:10:22

15 MR. CHEW: Ms. Bredehoft, please let -- 13:10:25

16 please let him finish. You say -- 13:10:26

17 MS. BREDEHOFT: He's not answering the 13:10:26

18 question. He's being -- 13:10:27

19 MR. CHEW: He was trying. He was trying 13:10:29

20 to answer your question. 13:10:30

21 MS. BREDEHOFT: He's not trying. 13:10:31

22 All right. Let's go. Take this one out, 13:10:34

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1	Austin.	13:10:35
2	MR. CHEW: Now you're just being nasty,	13:10:36
3	and if you continue --	13:10:37
4	MS. BREDEHOFT: I'm not being nasty.	13:10:37
5	You're intentionally trying to drag this out so	13:10:39
6	that I don't get to ask the questions, and you	13:10:41
7	know it.	13:10:44
8	MR. CHEW: You're projecting your value or	13:10:44
9	lack thereof onto me.	13:10:45
10	BY MS. BREDEHOFT:	
11	Q All right. Let's talk about the op-ed,	13:10:47
12	all right, that Amber Heard published in The	13:10:50
13	Washington Post. Do you recall that?	13:10:53
14	A When the article was published in the	13:10:55
15	Washington Post was December 18th, 2000 --	13:10:58
16	December something 2018, was it?	13:11:05
17	Q I'm asking -- okay. Let's just go to the	13:11:07
18	next question. Yes, that's correct. Okay. Other	13:11:10
19	than --	13:11:12
20	A That's good. My memory worked. That's	13:11:12
21	great.	13:11:15
22	Q So, other than -- you're looking down at	13:11:15

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1 evidence. Assuming partial recordings.
 2 A I just looked at a piece of paper that you
 3 showed me with these file names on them. You even
 4 yourself skipped through the file names because
 5 it's a bunch of numbers. You're saying one is
 6 partial. Did I make it partial or did I give it?
 7 I don't know what these are.
 8 So, I don't -- I cannot tell you
 9 1,000 percent what these things are, so I cannot
 10 answer your questions in any way that's going to
 11 please you and make you jump for joy. I can only
 12 tell you, as I did say --
 13 Q But the answer is no. The answer is no,
 14 you have not made any effort --
 15 MR. CHEW: Ms. Bredehoff, please let --
 16 please let him finish. You say --
 17 MS. BREDEHOFT: He's not answering the
 18 question. He's being --
 19 MR. CHEW: He was trying. He was trying
 20 to answer your question.
 21 MS. BREDEHOFT: He's not trying.
 22 All right. Let's go. Take this one out,

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1 Austin.
 2 MR. CHEW: Now you're just being nasty,
 3 and if you continue --
 4 MS. BREDEHOFT: I'm not being nasty.
 5 You're intentionally trying to drag this out so
 6 that I don't get to ask the questions, and you
 7 know it.
 8 MR. CHEW: You're projecting your value or
 9 lack thereof onto me.
 10 BY MS. BREDEHOFT:
 11 Q All right. Let's talk about the op-ed,
 12 all right, that Amber Heard published in The
 13 Washington Post. Do you recall that?
 14 A When the article was published in the
 15 Washington Post was December 18th, 2000 --
 16 December something 2018, was it?
 17 Q I'm asking -- okay. Let's just go to the
 18 next question. Yes, that's correct. Okay. Other
 19 than --
 20 A That's good. My memory worked. That's
 21 great.
 22 Q So, other than -- you're looking down at

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1 something. What are you looking at?
 2 A It's a drawing.
 3 Q All right. Other than your attorneys, did
 4 you have any communications with anyone about the
 5 op-ed between December 18, 2018, and March 1,
 6 2019, when you filed this lawsuit? I'm asking for
 7 anyone other than your attorneys.
 8 A I don't recall.
 9 Q Okay. Now, between the time of the op-ed
 10 being published on December 18, 2018, and March 1,
 11 2019, when you filed the lawsuit, did you lose any
 12 roles or career opportunities?
 13 A Yes --
 14 Q What?
 15 A -- I did. Well, I had a decent -- a
 16 decent run with Disney for a while there on a
 17 series of films called Pirates of the Caribbean
 18 that I was removed from after the op-ed was
 19 released.
 20 Q Has there been a Pirates of the Caribbean
 21 6?
 22 A Not just yet. I think they're trying to

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1 figure out exactly how to do it.
 2 Q Has anyone spoken with you from Disney
 3 about any role that you may have in Pirates 6?
 4 A No.
 5 Q Now, after the U.K. judgment, you were
 6 asked to resign from Fantastic Beast 3, and you
 7 testified about that earlier, and I'm not going to
 8 go through all of that again. What has your
 9 career been like since you were asked to leave the
 10 Fantastic Beast 3 and the U.K. judgment was
 11 released?
 12 MR. CHEW: Objection. Ambiguous. Vague.
 13 A The only way that I can explain it is --
 14 well, it's very simple. Everybody is told, "Turn
 15 off. Flick that light. There's no -- he doesn't
 16 exist no more. Out," you know. Basically, it --
 17 yes, it's been -- I've been -- yeah, it was kind
 18 of -- I'm a leper in Hollywood.
 19 Q Okay. Have you had any roles? Have you
 20 received any roles since the U.K. judgment came
 21 out in November 2 of 2021?
 22 A From --

<p style="text-align: right;">996</p> <p>1 Q Sorry.</p> <p>2 A From -- from Hollywood?</p> <p>3 Q Yes, anyone, anywhere.</p> <p>4 A Not from Hollywood, no. I have a</p> <p>5 production company, and we've developed a number</p> <p>6 of projects, one of which, Minamata, we did --</p> <p>7 shot a film and it was released, although had --</p> <p>8 back from MGM because they wouldn't release it</p> <p>9 because of the situation with my name being linked</p> <p>10 to leper colonies.</p> <p>11 Q And this is after the U.K. judgment.</p> <p>12 A Yes, it is. It is after the U.K.</p> <p>13 judgment.</p> <p>14 Q All right. I'm going to jump to Tokyo for</p> <p>15 a moment.</p> <p>16 A Boy, that's hard.</p> <p>17 Q Do you recall -- do you recall going to</p> <p>18 Tokyo in January of 2015 with Amber Heard?</p> <p>19 A Oh, yes.</p> <p>20 Q Okay. Do you recall what the movie was</p> <p>21 that you were going to for the premier?</p> <p>22 A Tokyo. No, ma'am, I don't. I don't.</p>	<p style="text-align: right;">998</p> <p>1 Q All right. Do you recall where you stayed</p> <p>2 in Tokyo?</p> <p>3 A I -- I have a feeling that it was the Park</p> <p>4 Hyatt, I believe.</p> <p>5 Q And did the children stay in the same room</p> <p>6 with you?</p> <p>7 A The children stayed in -- we had adjoining</p> <p>8 rooms, but it was sort of like a -- it was like a</p> <p>9 nightly sleepover. You know, there was --</p> <p>10 everyone would gather in the living room, couches</p> <p>11 and chairs, and sleep on floors and pillows and</p> <p>12 things like that.</p> <p>13 Q And that was true of Brittany and Steven</p> <p>14 Deuters, as well?</p> <p>15 A No, Steven keeps to himself. Brittany</p> <p>16 Eustice is -- was a very close friend of -- of</p> <p>17 Ms. Heard's and -- and she was -- she was very</p> <p>18 good with kids. My kids liked her, Brittany.</p> <p>19 Q Okay.</p> <p>20 A I can't remember if there was anyone --</p> <p>21 there might have been. I don't remember if her</p> <p>22 sister, Ms. Enriques was there or not.</p>
<p style="text-align: right;">997</p> <p>1 It's a -- there's a lot -- I've been to Tokyo a</p> <p>2 number of times for premieres. I can't remember</p> <p>3 which --</p> <p>4 Q Do you recall whether your children --</p> <p>5 A Yes, my children --</p> <p>6 Q -- with you on that trip?</p> <p>7 A Yes, they were with us, yes.</p> <p>8 Q Was there anyone else besides Amber Heard,</p> <p>9 your children, and you that went on that trip to</p> <p>10 Tokyo in 2015?</p> <p>11 A Yes, there was her friend Brittany</p> <p>12 Eustice.</p> <p>13 Q Okay. Anyone else?</p> <p>14 A I believe one of the -- one or two of the</p> <p>15 guys from my camp, maybe Steven Deuters, or one of</p> <p>16 security, maybe. I can't remember. Maybe it was</p> <p>17 Jerry Jost. I don't -- I don't remember.</p> <p>18 Q Did anyone else accompany the children?</p> <p>19 A The children were with -- no, pretty</p> <p>20 much -- so, I don't -- no, we didn't bring a nanny</p> <p>21 there. They were older -- they were old enough to</p> <p>22 not have a nanny.</p>	<p style="text-align: right;">999</p> <p>1 MS. BREDEHOFT:</p> <p>2 Q Okay. Austin, can you bring up</p> <p>3 Exhibit 51, please?</p> <p>4 REMOTE TECH: Stand by.</p> <p>5 (Depp Exhibit 51, previously marked, is</p> <p>6 attached to the transcript.)</p> <p>7 Q Mr. Depp, I'm going to ask you to look --</p> <p>8 take a look at what has been marked as Depp</p> <p>9 Exhibit Number 51. It's page 12 of Amber Heard's</p> <p>10 counterclaim. And, in particular, I'm just going</p> <p>11 to ask you, and this is my last series of</p> <p>12 questions and then I'm done, but I'm going to ask</p> <p>13 you to take a look at paragraphs 45, 46, and 47</p> <p>14 for a moment. And let me make that a little bit</p> <p>15 larger.</p> <p>16 A Oh, that's good. Yeah.</p> <p>17 Q Oops. Oops. I'll scroll down so you can</p> <p>18 see it. Okay. Do you see -- let me know when</p> <p>19 you're done.</p> <p>20 A Yes, I'm -- I've finished.</p> <p>21 Are you finished?</p> <p>22 Q Was -- was Adam Waldman acting as your</p>

<p style="text-align: right;">1000</p> <p>1 attorney when these statements were made? 2 MR. CHEW: Mr. Depp, I'm instructing you 3 not to answer that question based on 4 attorney-client privilege. 5 Q Did Adam Waldman have the authority to 6 speak on your behalf in making these statements 7 that are reflected in paragraphs 45 through 47 of 8 the counterclaim? 9 MR. CHEW: Mr. Depp, I'm instructing you 10 not to answer that question based on the 11 attorney-client privilege. 12 Q Did you authorize Adam Waldman to make 13 these statements that are reflected in paragraphs 14 45, 46, and 47 of the counterclaim? 15 MR. CHEW: I respectfully instruct you not 16 to answer that question based on attorney-client 17 privilege. 18 Q Have you at any time -- I'm sorry. 19 Have you at any time -- I'm assuming 20 you're taking your -- your attorney's advice and 21 that's why I'm not making you say more. Fair 22 enough?</p>	<p style="text-align: right;">1002</p> <p>1 A True. Yes, I said it before but you 2 started early, so I just went with it. 3 Q Okay. Is Adam -- have you ever asked Adam 4 Waldman to retract these statements that are 5 reflected in paragraphs 35, 36, and 37? 6 MR. CHEW: I would instruct you not to 7 answer the question based on attorney-client 8 privilege. 9 Q Is Adam Waldman still your attorney and 10 agent? 11 MR. CHEW: Objection to the form of the 12 question. It's compound and calls for a legal 13 conclusion. 14 A Is Adam Waldman still my -- is still legal 15 counsel for me? 16 Q Yes. 17 A Yes. 18 Q Okay. And that has not changed at any 19 point between April 8, 2020, and the present; is 20 that correct? 21 A No, ma'am. 22 MS. BREDEHOFT: Okay. I think that I</p>
<p style="text-align: right;">1001</p> <p>1 A Yes. 2 Q Do you -- have you ever retracted these 3 statements reflected in paragraphs 45, 46, and 47? 4 MR. CHEW: Assumes facts not in evidence. 5 He didn't make the statements. 6 Q Do you remember the question? 7 A Yes, I remember the question. 8 Q Have you at any time retracted these or 9 said these were false? 10 MR. CHEW: Objection to the form of the 11 question. Compound. 12 And I would instruct you not to answer the 13 question to the extent it would require you to 14 disclose attorney-client privilege. So, I'm going 15 to instruct you not to answer. So, I instruct you 16 not to answer. 17 MS. BREDEHOFT: Okay. And, Ben, just so 18 we're clear on the record, when you instruct him 19 not to answer, we're assuming he's accepting your 20 instruction; correct? So, I don't have to say, 21 "Are you following your attorney's advice"; right? 22 MR. CHEW: Correct.</p>	<p style="text-align: right;">1003</p> <p>1 might be out of time. 2 John, what is the running time here? I'm 3 trying to respect my time here. 4 MR. CHEW: There's no rule requiring you 5 to fill out the time. 6 MS. BREDEHOFT: Yeah, I know, but I'm also 7 going to respect if I only have three-and-a-half, 8 I think I've hit that. If I didn't, though, I 9 have more questions. That's why I'm asking John. 10 John, would it be better if we go off the 11 record and then check that and then we'll see? 12 MR. CHEW: I think we should stay on the 13 record. 14 MS. BREDEHOFT: Oh, okay. I thought he 15 said last time he had to go off in order to 16 calculate. 17 THE VIDEOGRAPHER: Yeah, to get an 18 accurate precise calculation, I'd have to go off 19 the record to stop the recording. 20 MS. BREDEHOFT: All right. Let's do that 21 real quick and check because I do think I'm out 22 and I don't want to --</p>

CONFIDENTIAL

Transcript of John C. Depp, II, Volume 4

42 (1020 to 1023)

Conducted on December 14, 2021

<p style="text-align: right;">1020</p> <p>1 COURT REPORTER: And is standard delivery 2 okay? 3 MR. CHEW: Yes, ma'am. 4 COURT REPORTER: Okay. Thank you all very 5 much. 6 (Off the record at 1:43 p.m. ET.) 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22</p>	<p style="text-align: right;">1022</p> <p>1 CERTIFICATE OF SHORTHAND REPORTER-NOTARY PUBLIC 2 I, Victoria L. Wilson, the officer before 3 whom the foregoing deposition was taken, do hereby 4 certify that the foregoing transcript is a true 5 and correct record of the testimony given; that 6 said testimony was taken by me stenographically 7 and thereafter reduced to typewriting under my 8 direction; that reading and signing was not 9 discussed; and that I am neither counsel for, 10 related to, nor employed by any of the parties to 11 this case and have no interest, financial or 12 otherwise, in its outcome. 13 IN WITNESS WHEREOF, I have hereunto set my 14 hand and affixed my notarial seal this 19th day of 15 December, 2021. 16 My commission expires February 3, 2024. 17 18  19 _____ 20 VICTORIA L. WILSON 21 NOTARY PUBLIC IN AND FOR 22 THE STATE OF MARYLAND</p>
<p style="text-align: right;">1021</p> <p>1 ACKNOWLEDGEMENT OF DEPONENT 2 I, JOHN C. DEPP, II, do hereby acknowledge 3 that I have read and examined the foregoing 4 testimony, and the same is a true, correct and 5 complete transcription of the testimony given by 6 me, and any corrections appear on the attached 7 Errata sheet signed by me. 8 9 _____ 10 (DATE) (SIGNATURE) 11 12 13 14 15 16 17 18 19 20 21 22</p>	