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JOHN T. FREY
CLERK, CIRCUIT COURT
FAIRFAX, VA

Transcript of Melanie Inglessis

Date: February 2, 2021

Case: Depp, II -v- Heard

**APPEALED TO THE COURT OF APPEALS
(ELECTRONIC APPEALS)**

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WORLDWIDE COURT REPORTING & LITIGATION TECHNOLOGY

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Transcript of Melanie Inglessis
Conducted on February 2, 2021

1 (1 to 4)

1	VIRGINIA:	1		1	A P P E A R A N C E S cont'd	3
2	IN THE CIRCUIT COURT FOR FAIRFAX COUNTY			2		
3	-----X			3	ON BEHALF OF DEFENDANT AMBER LAURA	
4	JOHN C. DEPP, II, :			4	HEARD:	
5	Plaintiff, : Civil Action No.:			5	ELAINE CHARLSON BREDEHOFT, ESQ.	
6	v. : CL-2019-0002911			6	CHARLSON BREDEHOFT COHEN & BROWN, P.C.	
7	AMBER LAURA HEARD, :			7	11260 Roger Bacon Drive	
8	Defendant. :			8	Suite 201	
9	-----X			9	Reston, VA 20190	
10				10	(703) 318-6800	
11	VIDEOTAPED DEPOSITION			11		
12	MELANIE INGLESSIS			12	ALSO PRESENT:	
13	CONDUCTED VIRTUALLY			13	JEAN-LOUIS ZIESCH, Videographer	
14	TUESDAY, FEBRUARY 2, 2021			14	ALEX SUSSMAN, Audio/Video Technician	
15	12:16 p.m.			15	AMBER LAURA HEARD	
16				16	MJ CANARY	
17	Job No.: 344480			17		
18	Pages 1 - 235			18		
19	Reported by: APRIL REID			19		
20				20		
21				21		
22				22		

1	Videotaped Deposition of MELANIE INGLESSIS	2		1	I N D E X	4
2	held virtually. All appeared remotely.			2		
3				3	MELANIE INGLESSIS PAGE	
4	A P P E A R A N C E S			4	Examination by Ms. Bredehoft 8	
5				5	Examination by Ms. Vasquez 87	
6	ON BEHALF OF PLAINTIFF JOHN C. DEPP, II:			6	Examination by Ms. Bredehoft 211	
7	CAMILLE VASQUEZ, ESQ.			7		
8	STEPHANIE CALNAN, ESQ.			8		
9	BROWN RUDNICK, LLP			9	E X H I B I T S	
10	2211 Michelson Drive			10		
11	Seventh Floor			11	INGLESSIS DESCRIPTION PAGE	
12	Irvine, CA 92612			12	Exhibit 4 Trial Testimony 7/22/20 28	
13	(949) 752-7100			13	4 pages	
14	and			14	Exhibit 6 audio/video recording 14	
15	BENJAMIN G. CHEW, ESQ.			15	Exhibit 7 picture of gold writing 24	
16	BROWN RUDNICK, LLP			16	Exhibit 8 picture of candle & CD 33	
17	601 Thirteenth Street, N.W.			17	Exhibit 9 picture of broken bed 34	
18	Washington, DC 20005			18	2 pages	
19	(202) 536-1700			19	Exhibit 10 picture of hair 40	
20				20	Exhibit 11 picture of hair w/red spot 45	
21				21	Exhibit 12 picture of hairline 47	
22				22	Exhibit 14 picture of Amber Heard 49	

Transcript of Melanie Inglessis
Conducted on February 2, 2021

2 (5 to 8)

5			7		
1	E X H I B I T S cont'd		1	P R O C E E D I N G S	
2			2	THE VIDEOGRAPHER: This is the beginning	
3	INGLESSIS	DESCRIPTION	3	of media number one of the Videotaped	
4	Exhibit 15	picture of Amber Heard	4	Deposition of Melanie Inglessis in the matter	
5	Exhibit 17	picture of Amber Heard	5	of Johnny Depp, et al., vs. Amber Heard, et	
6	Exhibit 19	picture of Amber Heard	6	al., in the Circuit Court of Fairfax County,	
7	Exhibit 20	picture of lip	7	Virginia, Case No. CL-2019-0002911.	
8	Exhibit 22	picture of Amber Heard	8	Today's date is February 2nd, 2021.	
9		on the Late Late Show	9	The time on the video monitor is 12:16	
10		w/James Corden	10	p.m. Eastern Standard Time.	
11	Exhibit 24	text messages	11	The certified videographer today is	
12	Exhibit 25	text messages	12	Jean-Louis Ziesch, representing Planet Depos.	
13	Exhibit 26	text messages	13	This video deposition is taking place	
14	Exhibit 27	text messages	14	remotely.	
15	Exhibit 28	e-mail - 2 pages	15	Will counsel please identify yourself	
16	Exhibit 29	Subpoena	16	and state who you represent.	
17	Exhibit 30	Declaration	17	MS. BREDEHOFT: Hello. My name is	
18		Melanie Inglessis	18	Elaine Bredehoft and I represent Amber Heard.	
19	Exhibit 31	Witness Summary	19	MS. VASQUEZ: Good morning. Camille	
20		Melanie Inglessis	20	Vasquez on behalf of Mr. Depp, joined by	
21	Exhibit 33	Sun Newspaper article	21	Stephanie Calnan and Mr. Chew.	
22			22	THE VIDEOGRAPHER: The court reporter	

6			8		
1	E X H I B I T S cont'd		1	today is April Reid, representing Planet	
2			2	Depos.	
3	INGLESSIS	DESCRIPTION	3	Will the court reporter please swear in	
4	Exhibit 34	text messages	4	the witness.	
5	Exhibit 35	text messages	5	THEREUPON:	
6	Exhibit 36	text messages	6	MELANIE INGLESSIS	
7	Exhibit 37	audio/video recording	7	being first duly sworn or affirmed to	
8			8	testify to the truth, the whole truth, and	
9	- - - - -		9	nothing but the truth, was examined and	
10			10	testified as follows:	
11			11	EXAMINATION	
12			12	BY MS. BREDEHOFT:	
13			13	Q. Will you please state your name and	
14			14	address, for the record.	
15			15	A. My name is Melanie Inglessis. My	
16			16	address is 344 Stowe Terrace, Los Angeles, 90042,	
17			17	California.	
18			18	Q. And Ms. Inglessis, what is your	
19			19	occupation?	
20			20	A. I'm a makeup artist.	
21			21	Q. And you, in fact, are a professional	
22			22	makeup artist; correct?	

<p>9</p> <p>1 A. Correct.</p> <p>2 Q. And -- and you obtained a Bachelor of</p> <p>3 Arts from London College of Fashion in 2000?</p> <p>4 MS. VASQUEZ: Objection, leading.</p> <p>5 Q. Okay. Where -- I'll re-ask it.</p> <p>6 Where did you obtain -- where did you</p> <p>7 obtain your Bachelor of Arts?</p> <p>8 A. From London College of Fashion in</p> <p>9 London.</p> <p>10 Q. And in what year?</p> <p>11 A. Around 2000.</p> <p>12 Q. Okay. Thank you.</p> <p>13 When did you first meet Amber Heard?</p> <p>14 A. April 2015.</p> <p>15 Q. And what was the occasion?</p> <p>16 A. Tribeca Film Festival in New York.</p> <p>17 Q. And were you providing makeup services</p> <p>18 for her on that occasion?</p> <p>19 A. Correct.</p> <p>20 Q. Okay. And did you become friends with</p> <p>21 Amber Heard after that?</p> <p>22 A. I did.</p>	<p>11</p> <p>1 leading, lack of foundation, assumes facts</p> <p>2 not in evidence.</p> <p>3 BY MS. BREDEHOFT:</p> <p>4 Q. I'll -- I'll restate the question.</p> <p>5 On any occasion that you were visiting</p> <p>6 Amber Heard at the penthouses, did Mr. Depp appear</p> <p>7 to be passed out? Vague & ambig.; R;</p> <p>8 MS. VASQUEZ: Objection, vague and improper</p> <p>9 ambiguous, assumes facts not in evidence. character</p> <p>10 A. Am I answering? evid.; F/A;</p> <p>11 Q. Yes. SP; lack of</p> <p>12 A. Okay. personal</p> <p>13 Yeah, I -- not at a penthouse, no. Not knowledge</p> <p>14 correct, no.</p> <p>15 Q. Okay. You still --</p> <p>16 A. I saw --</p> <p>17 Q. Go ahead. Go ahead. Finish your -- I</p> <p>18 didn't mean to interrupt you. Go ahead.</p> <p>19 A. Not in the penthouse, no. In his other</p> <p>20 house, at the main house.</p> <p>21 Q. The Sweetzer?</p> <p>22 A. In the Sweetzer, that's correct.</p>
<p>10</p> <p>1 Q. Okay. And did you have opportunities to</p> <p>2 visit Amber Heard at the penthouses that she lived</p> <p>3 in on -- in the Eastern Columbia building?</p> <p>4 A. Yeah.</p> <p>5 MS. VASQUEZ: Objection, vague and</p> <p>6 ambiguous as to time.</p> <p>7 Q. During 2015?</p> <p>8 A. Yes.</p> <p>9 Q. Okay. When did you first met -- meet</p> <p>10 Mr. Depp?</p> <p>11 A. I don't exactly recall the date, but I</p> <p>12 would think within maybe the end of 2015.</p> <p>13 Q. Okay. Now, you saw Mr. Depp on a number</p> <p>14 of occasions when you visited Amber Heard at the</p> <p>15 penthouse; is that correct?</p> <p>16 A. Right.</p> <p>17 MS. VASQUEZ: Objection, lack of</p> <p>18 foundation, leading.</p> <p>19 Q. And -- and would it be fair to state</p> <p>20 that on at least one occasion Mr. Depp was</p> <p>21 intox- -- intoxicated and passed out?</p> <p>22 MS. VASQUEZ: Objection, compound,</p>	<p>12</p> <p>1 Q. That's the Sweetzer home? Vague &</p> <p>2 A. Yeah. ambig.; R;</p> <p>3 Q. Okay. And what did you see then? improper char.</p> <p>4 A. Mr. Depp passed out. evid.; F/A; SP;</p> <p>5 Q. Do you recall whether there was any lack of pers.</p> <p>6 doctor or nurse that was visiting Mr. Depp on any know.</p> <p>7 of the occasions you were there?</p> <p>8 A. I don't --</p> <p>9 MS. VASQUEZ: Objection, compound,</p> <p>10 assumes facts not in evidence, lack of</p> <p>11 foundation, calls for speculation.</p> <p>12 Q. I'm sorry. Did you answer?</p> <p>13 A. I -- I don't recall, no.</p> <p>14 Q. Okay. Do you -- did you ever meet</p> <p>15 Dr. Kipper?</p> <p>16 A. No.</p> <p>17 MS. VASQUEZ: Objection, lack of</p> <p>18 foundation, leading.</p> <p>19 Q. Did -- I guess she had some objections</p> <p>20 there.</p> <p>21 Now you're answering. I guess you have</p> <p>22 to give your answer again. I'm sorry.</p>

L; R

Transcript of Melanie Inglessis
Conducted on February 2, 2021

4 (13 to 16)

<p>13</p> <p>1 A. No.</p> <p>2 Q. Okay. All right. So were there any</p> <p>3 occasions that you observed Mr. Depp acting in an</p> <p>4 angry manner?</p> <p>5 A. No.</p> <p>6 MS. VASQUEZ: Objection, vague and</p> <p>7 ambiguous.</p> <p>8 Sorry, Ms. Inglessis. I -- I'm trying</p> <p>9 to get my objections on the record, but it</p> <p>10 helps if you just give me that two-second</p> <p>11 delay.</p> <p>12 THE WITNESS: Sure. Sorry. Of course.</p> <p>13 MS. VASQUEZ: No, no, nothing to be</p> <p>14 sorry about. Just April would be very</p> <p>15 grateful if we do that.</p> <p>16 THE WITNESS: Okay.</p> <p>17 MS. VASQUEZ: I'm sorry, Elaine. Do you</p> <p>18 mind repeating the question or having it read</p> <p>19 back?</p> <p>20 MS. BREDEHOFT: Go ahead. April, you</p> <p>21 want to read it back.</p> <p>22 THE COURT REPORTER: Of course.</p>	<p>15</p> <p>1 (Audio/Video recording played.)</p> <p>2 BY MS. BREDEHOFT:</p> <p>3 Q. Ms. Inglessis, do you recognize the two</p> <p>4 people in that video?</p> <p>5 A. Yes.</p> <p>6 Q. And who are they?</p> <p>7 A. Yes. Amber Heard --</p> <p>8 Q. And who are they?</p> <p>9 A. -- and Johnny Depp.</p> <p>10 Q. Okay. Did you ever see Mr. Depp act in</p> <p>11 that manner around you?</p> <p>12 MS. VASQUEZ: Objection, vague and</p> <p>13 ambiguous.</p> <p>14 A. No.</p> <p>15 Q. Does it surprise you?</p> <p>16 MS. VASQUEZ: Objection, calls for</p> <p>17 speculation.</p> <p>18 A. I don't know. I mean, it's not my -- I</p> <p>19 don't know.</p> <p>20 Q. Okay. Do you recall talking with Ms.</p> <p>21 Heard about Mr. Depp abusing her --</p> <p>22 MS. VASQUEZ: Objection, lack of</p>
<p>14</p> <p>1 MS. BREDEHOFT: Thank you.</p> <p>2 (Thereupon, the above-referred to</p> <p>3 portion of the Record was read back by</p> <p>4 the Court Reporter)</p> <p>5 MS. VASQUEZ: Right. The objection is</p> <p>6 vague and ambiguous, lack of foundation.</p> <p>7 A. No.</p> <p>8 Q. Okay.</p> <p>9 MS. BREDEHOFT: Alex, I'm going to ask</p> <p>10 you to bring up Exhibit Number 6, please.</p> <p>11 (Exhibit 6 was marked for identification</p> <p>12 and is attached to the transcript)</p> <p>13 MS. VASQUEZ: Counsel, I'm just going to</p> <p>14 object to you showing this witness this video</p> <p>15 clip that has been shown several times in the</p> <p>16 media and otherwise. She was not present on</p> <p>17 this occasion and lack of foundation and</p> <p>18 hearsay and assumes facts not in evidence.</p> <p>19 I'm sure you're going to play it for her</p> <p>20 anyways.</p> <p>21 MS. BREDEHOFT: Alex, can you please</p> <p>22 play the video.</p>	<p>16</p> <p>1 foundation, assumes facts not in evidence,</p> <p>2 vague and ambiguous as to time.</p> <p>3 MS. BREDEHOFT: Let -- let me finish my</p> <p>4 question.</p> <p>5 MS. VASQUEZ: I'm sorry, Elaine.</p> <p>6 Q. I'll start again.</p> <p>7 MS. VASQUEZ: I'm sorry. I apologize,</p> <p>8 Elaine. I'm not trying to cut you off.</p> <p>9 MS. BREDEHOFT: All right.</p> <p>10 BY MS. BREDEHOFT:</p> <p>11 Q. Did you ever -- during the time that</p> <p>12 you -- that Amber Heard was married to Mr. Depp</p> <p>13 and you were friends with Amber, did she ever</p> <p>14 discuss with you any abuse by Mr. Depp of her?</p> <p>15 MS. VASQUEZ: Objection, assumes facts</p> <p>16 not in evidence, calls for hearsay, lack of</p> <p>17 foundation, vague and ambiguous.</p> <p>18 A. Yes.</p> <p>19 Q. What do you recall?</p> <p>20 MS. VASQUEZ: Objection, calls for</p> <p>21 hearsay, vague and ambiguous.</p> <p>22 A. What do I recall? I mean, do you want</p>

H; F/A;
SP; lack
of pers.
know.

H; F/A;
SP; lack
of pers.
know.

H

H

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<p>17</p> <p>1 to ask me more precise questions? I'm just not 2 sure what you want me to tell you. 3 Q. I -- I'm trying to be careful not to ask 4 leading questions -- 5 A. Okay. 6 Q. -- because I'm not allowed to ask 7 leading questions, so that's why I've inserted 8 little, you know, in between there. So let me see 9 if I can... 10 What, if anything, do you recall about 11 Amber Heard telling you that she was being abused 12 by Mr. Depp? 13 MS. VASQUEZ: Objection, assumes facts 14 not in evidence, calls for hearsay, lack of 15 foundation, it's vague and ambiguous, and 16 compound. 17 A. There was -- there was many occasions 18 throughout the time I've known Amber where she 19 confided in me about the abuse that she faced. 20 Q. Okay. And what, if anything, did Amber 21 say about trying to get out of the marriage and 22 leave the relationship as a result of the abuse?</p>	<p>19</p> <p>1 Ms. Inglessis, I would love to ask you questions 2 that just let you say yes or no, but that's what 3 lawyers call leading; and you hear one of Ms. 4 Vasquez' objections is if I ask a leading 5 question. So I can't imply or infer that a 6 question's going to be a yes or no. So I'm trying 7 very carefully to -- I understand. And I'm trying 8 not to make it confusing. 9 A. Right. 10 Q. So I am just doing my best to balance 11 that. So please bear with me and I'll do my best 12 on this. 13 In these occasions that Amber Heard told 14 you about Mr. Depp abusing her, what, if anything, 15 did she say about being conflicted and being in 16 love with him but not being able to deal with the 17 abuse? 18 MS. VASQUEZ: Objection, compound, 19 leading, assumes facts not in evidence, calls 20 for hearsay. 21 A. I mean, throughout her relationship she 22 was -- yeah, she was in a -- she was in love with</p>
<p>18</p> <p>1 MS. VASQUEZ: Objection, leading, 2 compound, assumes facts not in evidence and 3 calls for hearsay. 4 A. Can you rephrase the question, please? 5 Q. Yes. I will. I'll try. 6 During these many conversations that you 7 had with Ms. Heard about Mr. Depp abusing her and 8 her confiding in you, what, if anything, did Ms. 9 Heard say about wanting to leave the relationship 10 or trying to fix it or how she was handling it? 11 MS. VASQUEZ: Objection, compound, 12 assumes facts not in evidence, leading, lack 13 of foundation, calls for hearsay. 14 A. I don't -- I don't know what to say. 15 I -- I just -- I just -- I don't know. I don't 16 know how to answer this. 17 I just wish you ask me questions that 18 would be a yes or no. I just don't want to start 19 talking and making -- like, I just need for you to 20 give a little more, you know -- I just don't know 21 how to answer that question. I'm sorry. 22 Q. Okay. And let me just explain to you,</p>	<p>20</p> <p>1 him. And she tried to leave him many times, but 2 couldn't. I -- I -- yeah, I don't know. 3 I just -- I mean, I'm confused because I 4 thought a deposition was just a matter of me 5 answering yes or no to a question. And I just 6 don't want to start speculating and telling 7 stories. I'm just a little confused. I thought 8 it was a yes or no or I don't know or I don't 9 recall. I just don't want to start... R, UR 10 I -- I -- 11 Q. No. I -- yeah. And I understand that. 12 A. I -- I just don't know what to say. I 13 don't know how to lead. I don't know what -- 14 yeah. 15 Okay. Well, let's try this again. 16 Yeah. I don't know. 17 Q. Yeah. 18 And, I'm sorry, I totally understand 19 that you haven't done this before so you don't 20 realize that. 21 A. No. 22 Q. But -- but we have rules so that we</p>

Vague &
ambig.; C;

F/A; SP;
lack of
pers.
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Vague &
ambig.; C;
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SP; lack
of pers.
know.

Vague
&
ambig.;
R F/A;
SP; lack
of pers.
know.;
H

<p>21</p> <p>1 don't manipulate or try to do it so it doesn't 2 look like we're manipulating your testimony by 3 trying to force you to say a yes or a no. You 4 understand? 5 So there's a balance there. And that's 6 why they have certain rules, so we have to ask you 7 in the right manner. 8 So I'll do my best. But -- but -- and 9 I'm going to try to move it as quickly as I can. 10 Okay? 11 A. Right. Right. 12 Well, I mean, for my relationship with 13 Amber, on my friendship with Amber for the last -- 14 you know, when we were friends for three years, I 15 felt she was in a abusive relationship; she was in 16 love with Johnny and she tried to live with him 17 but just couldn't.</p> <p>Vague & ambig.; R; H; F/A; SP; lack of pers. know.</p>	<p>23</p> <p>1 bowling. So I think December 14th we had made 2 a -- you know, a plan for Amber to come to my 3 neighborhood and go bowling with myself and my 4 husband, correct. 5 And then we've never -- she never showed 6 up. And then I got a text, which I know you guys 7 have, around like maybe 9:30, 10, explaining why 8 she never made it to bowling that night. 9 That was the night before James Corden, 10 if I recall properly. 11 Q. Okay. And then, what did you do when 12 you received the text from Amber Heard? 13 MS. VASQUEZ: Objection, vague and 14 ambiguous. 15 A. When I received the text from Amber I 16 must -- I think I, you know, asked her if she was 17 okay, asked her if I could/should come see her 18 straight-away at the penthouse. Yeah. 19 Q. And then, did you go to the penthouse 20 that night? 21 A. Not that -- I don't recall. 22 Oh, God. Let me just think.</p> <p>Vague & ambig.; R; F/A; SP; lack of pers. know.; H</p>
<p>22</p> <p>1 first time that you actually observed any signs of 2 Amber Heard being physically abused by Johnny 3 Depp? 4 MS. VASQUEZ: Objection, compound, 5 assumes facts not in evidence, lack of 6 foundation. 7 A. The first time I witnessed Amber's 8 physical bruises was the day of the James Corden 9 show. 10 Q. Okay. And that was -- I'm sorry. 11 A. That is the day that I witnessed bruises 12 on her face. 13 Q. Okay. And that was December 15th, 2015. 14 Does that ring a bell? 15 A. Correct. December 15th, 2015, correct. 16 Q. And can you -- were you supposed to -- 17 that particular night, were you supposed to meet 18 up with Amber Heard someplace? 19 A. The night before -- 20 MS. VASQUEZ: Objection, vague and 21 ambiguous. 22 A. The night before we were supposed to go</p> <p>IC; R</p> <p>Vague & ambig.; IC; R; F/A; SP; lack of pers. know.</p>	<p>24</p> <p>1 You know it was awhile -- it was a long 2 time ago. 3 Q. Yeah. Yeah. Well, let me do this. 4 MS. BREDEHOFT: Let me bring up -- Alex, 5 can you bring up Exhibit Number 7, please. 6 (Exhibit 7 was marked for identification 7 and is attached to the transcript). 8 Q. Ms. Inglessis, I'm going to show you 9 what has been marked as Exhibit Number 7. 10 Do you recognize what's depicted in this 11 photograph? 12 MS. VASQUEZ: Objection, vague and 13 ambiguous, assumes facts not in evidence. 14 A. Yes. 15 Q. What do you recall? 16 A. I recall seeing this on the kitchen of 17 the penthouse. When you enter, that's the -- they 18 have a bar, a kitchenette to the left and that was 19 there. Yes. 20 Q. And -- and does that help refresh your 21 recollection on whether it was that night or the 22 next day that you were there?</p> <p>Vague & ambig.; R; H</p> <p>Vague & ambig.; R; H</p>

Vague &
ambig.;
IC; R; F/A;
SP; lack of
pers.
know.

R; F/A;
SP; lack of
pers.
know.

25
1 MS. VASQUEZ: Objection, vague and
2 ambiguous.
3 **A. It -- not really. I mean -- not really.**
4 **I'm sorry.**
5 Q. Okay. But when you came to the
6 penthouse after -- after Amber had texted you,
7 whether it was that night or the next day, you saw
8 this in the kitchen; is that correct, painted?
9 MS. VASQUEZ: Objection --
10 **A. Yes.**
11 MS. VASQUEZ: -- lack of foundation,
12 assumes facts not in evidence.
13 Q. Okay. And it -- it -- would -- could
14 you just describe that color --
15 MS. VASQUEZ: Objection, vague and
16 ambiguous.
17 **A. What color?**
18 Q. Let me just finish my question.
19 Can you describe the color of the
20 writing?
21 MS. VASQUEZ: Same objection.
22 **A. Gold.**
26
1 Q. Okay.
2 MS. VASQUEZ: And assumes facts not in
3 evidence.
4 **A. It's gold.**
5 MS. BREDEHOFT: All I asked her was the
6 color of the writing.
7 MS. VASQUEZ: It assumes that there's
8 writing in that picture and a bunch of other
9 assumptions.
10 Q. Okay. Ms. Inglessis, can you read the
11 writing that's in this picture?
12 **A. "Why be a fraud? All is such bull**
13 **shit."**
14 Q. Do -- do you know who wrote that?
15 **A. I don't know, no.**
16 Q. Okay. But it was there.
17 And this -- can you just describe where
18 this was in the penthouse, this writing, this
19 picture?
20 **A. When you enter the penthouse, you have a**
21 **little corridor, and you turn left to the main**
22 **kitchen and the main room, and to the left there's**

27
1 **like a little bar. It was there to the left. So**
2 **basically, on a kitchen counter.**
3 Q. Okay. All right. And does this picture
4 accurately depict what you saw?
5 MS. VASQUEZ: Objection, vague and
6 ambiguous.
7 **A. I don't know what you're asking.**
8 Q. What I'm asking -- what I'm asking is:
9 **Does this picture accurately portray what you saw?**
10 In other words, does it -- is that what
11 you recall seeing or is that there's been
12 something -- something wrong with the picture or
13 it looks like it's been altered or anything like
14 that?
15 MS. VASQUEZ: Objection, calls for
16 speculation, vague and ambiguous, compound.
17 **A. I mean, it does -- it does fit what I**
18 **remember that day --**
19 Q. Okay.
20 **A. -- was writing.**
21 Q. Okay. Thank you. Thank you.
22 MS. BREDEHOFT: Alex, if you can take
28
1 that down.
2 **And if you can bring up Exhibit Number**
3 **4.**
4 (Exhibit 4 was marked for identification
5 and is attached to the transcript).
6 BY MS. BREDEHOFT:
7 Q. Ms. Inglessis, you provided testimony in
8 the United Kingdom proceedings in which Mr. Depp
9 brought a lawsuit against the Sun newspaper and
10 Mr. Wootton, the editor-in-chief.
11 Do you recall that?
12 **A. Yes.**
13 Q. Okay. And do you recall that that
14 testimony was on July 22nd, 2020?
15 **A. Yes.**
16 Q. All right. I'm going to ask you to take
17 a look --
18 MS. BREDEHOFT: And Alex, I guess I will
19 just take control. That might be easier.
20 Q. I'm going to go down to page -- page
21 1980 because that's where it starts.
22 And forgive me for a minute. Sometimes

Vague &
ambig.; R;
C; F/A; SP;
lack of
pers. know.

29
1 this goes a little crazy when you're trying to do
2 it.
3 Now, here's where -- you remember Sasha
4 Waas, the queen's counsel for the Sun, asked you
5 some questions?
6 A. Yes.
7 Q. And so you had said -- she said:
8 "QUESTION: Can you tell us what you saw
9 on Amber's face on that day?"
10 A. Yes.
11 Q. "QUESTION: On that occasion?"
12 And you said:
13 "ANSWER: So on -- "
14 I can't get my -- there you go.
15 "ANSWER: So on December 2015, it was
16 the day before the James Corden show --
17 A. Uh-huh.
18 Q. "ANSWER -- which was December 16th --
19 I'm having a little trouble exactly remembering
20 the December 15 event.
21 I am going to tell you what I remember.
22 I was supposed to go bowling -- my husband and I

30
1 were supposed to go bowling with Amber by my
2 husband."
3 A. Uh-huh.
4 Q. "ANSWER: I believe around 8:30 or 9.
5 And she never showed up. I went back home. She
6 did send a text around 10, 10:30, which I'm sure
7 you have in your files somewhere."
8 Which is what you just said.
9 A. Uh-huh.
10 Q. "ANSWER: And I asked her if she was
11 okay. And she said no, not really; Johnny came
12 around to talk, you know, and we had a fight and
13 he beat on me, and so on and so forth. And I
14 said, do you need me to come? And she said, yes.
15 So I came to the penthouse on December 15th."
16 Does that help refresh your recollection
17 as to whether you went over that night?
18 A. Yes.
19 Q. Okay. And then, the next question she
20 said:
21 "QUESTION: What did you see when you
22 came to the house?"

31
1 Answer: You said.
2 "ANSWER: Well, a couple of things that
3 I remember entering penthouse 5, which I do
4 believe is the penthouse where they lived
5 together. You enter, you have a small
6 corridor, and then to the left, you turn
7 left, the kitchen was there and the kitchen
8 counters. So a couple of things that I do
9 remember is this writing in gold paint or
10 gold marker on the left, a couple of broken
11 frames, glass or floor and damage on the bed
12 upstairs."
13 Do you recall that?
14 A. Yes.
15 Q. Okay. And does that help refresh your
16 recollection?
17 A. Yes.
18 MS. VASQUEZ: Objection, vague and
19 ambiguous, document speaks for itself, lack
20 of foundation, assumes facts not in evidence.
21 Q. I'm -- I'm sorry. You -- we need you to
22 answer again, Ms. Inglessis.

32
1 A. Yes. Yes.
2 Q. Okay. Okay. And so you do recall being
3 there that that evening?
4 MS. VASQUEZ: Objection, vague and
5 ambiguous.
6 A. I do recall being there.
7 You know, my -- my only concern with all
8 of this is that -- was it the day before or during
9 another incident? But it says -- if -- if my text
10 said I was there the night before, then I was
11 there the night before.
12 Q. Okay. And -- and you -- that's what you
13 testified under oath at that time.
14 Did you remember it better then than you
15 do now, do you think?
16 MS. VASQUEZ: Objection, vague and
17 ambiguous.
18 A. I mean, I -- I just -- not really. It's
19 all the same.
20 Q. Okay.
21 A. You know what I mean? It's like...
22 Q. I -- I understand.

C; F/A;
SP; lack of
personal
knowledge;
H

Vague &
ambig.; C;
F/A; SP;
lack of
personal
know.; H

H; C;
vague &
ambig.;
F/A; SP;
lack of
personal
know.

Vague &
ambig.; C;
F/A; SP;
lack of
pers.
know.; R

33

1 Okay.

2 MS. BREDEHOFT: Alex, can you --

3 **A. You know what I mean? This takes --**

4 **it's very important for other people. It's not**

5 **that important to me, so.**

6 **It -- it -- yes, I was there the night**

7 **before if it say so, if my text says so, if my**

8 **testimony say so, then I was there the night**

9 **before, correct.**

10 Q. Okay. Thank you very much.

11 MS. BREDEHOFT: Alex, can you take this

12 down and bring me Exhibit Number 8.

13 (Exhibit 8 was marked for identification

14 and is attached to the transcript).

15 Q. Ms. Inglessis, I'm going to ask you to

16 take a look at Exhibit Number 8.

17 Do you -- do you recall seeing this

18 damage that night on December 15th, 2015?

19 MS. VASQUEZ: Objection, assumes facts

20 not in evidence, lack of foundation.

21 **A. I don't recall.**

22 Q. But you did recall that there was some

34

1 other damage to property that night; correct?

2 **A. Correct.**

3 MS. VASQUEZ: Objection, assumes facts

4 not in evidence, vague and ambiguous,

5 leading.

6 **A. Correct.**

7 Q. Thank you.

8 Okay. Do you recall any of the

9 specifics of the property that was damaged?

10 MS. VASQUEZ: Objection, vague and

11 ambiguous, assumes facts not in evidence.

12 **A. I don't recall.**

13 Q. All right.

14 MS. BREDEHOFT: Alex, can you bring up

15 number 9, please?

16 (Exhibit 9 was marked for identification

17 and is attached to the transcript).

18 Q. Ms. Inglessis, I'm going to ask you to

19 look at what has been marked as Deposition

20 Exhibit Number 9.

21 Do you recognize what is depicted in

22 this photo?

35

1 **A. Well, it's a bed, it looks like. I**

2 **mean, it's a very tight picture of the bed, but**

3 **I'm a -- I mean, it's a bed.**

4 Q. And do you recall seeing this the night

5 of -- of December 15 with a broken part of the bed

6 frame?

7 MS. VASQUEZ: Objection, assumes facts

8 not in evidence, vague and ambiguous.

9 **A. Upstairs, yes.**

10 Q. Okay. And when you say "upstairs,"

11 what -- what do you mean?

12 **A. Well, her bed -- their bedroom was**

13 **upstairs.**

14 Q. Okay.

15 **A. There's a downstairs and there's an**

16 **upstairs.**

17 Q. Okay. And the downstairs had the

18 kitchen with the writing.

19 Do you remember where the other property

20 that you saw was? Was that downstairs or upstairs

21 --

22 MS. VASQUEZ: Objection, vague and

36

1 ambiguous, assumes facts not in evidence,

2 calls for speculation.

3 Q. I'm sorry. I wasn't quite finished.

4 The property that was damaged, was that

5 upstairs or downstairs?

6 MS. VASQUEZ: Same objection.

7 **A. Downstairs.**

8 Q. And then, at some point you went

9 upstairs and saw the bed; is that correct?

10 MS. VASQUEZ: Objection, leading.

11 Q. All right. At some point did you see

12 the bed?

13 MS. VASQUEZ: Same objection.

14 Q. All right. What, if anything, did you

15 see with relationship to a bed and it being

16 broken?

17 MS. VASQUEZ: And vague and ambiguous as

18 to time.

19 **A. I'm sorry. So what's the -- what's the**

20 **final question?**

21 Q. What -- what, if anything, did you see

22 in the penthouse that evening about -- relating to

F/A; SP;
lack of
pers. know
R

Vague &
ambig.; C;
F/A; SP;
lack of
personal
know.

R; vague &
ambig.; C;
F/A; SP;
lack of
pers. know

R; vague &
ambig.; C;
F/A; SP;
lack of
pers. know.

<p>37</p> <p>1 a broken bed?</p> <p>2 MS. VASQUEZ: Objection, vague and</p> <p>3 ambiguous as to time. It also misstates her</p> <p>4 testimony.</p> <p>5 A. Look, do I answer or I don't answer?</p> <p>6 Q. Yes, you still answer.</p> <p>7 A. So I remember the bed upstairs because</p> <p>8 Amber talked through what happened.</p> <p>9 If I recall properly, it was me and</p> <p>10 Rocky, and she talked through us and what</p> <p>11 happened. So we were upstairs while she tell</p> <p>12 us -- told us what happened.</p> <p>13 Q. What do you recall Amber Heard telling</p> <p>14 you about what happened that night, December 15th,</p> <p>15 2015?</p> <p>16 MS. VASQUEZ: Objection, vague and</p> <p>17 ambiguous, calls for hearsay.</p> <p>18 A. She said that they had a bad fight. She</p> <p>19 said that she was scared for her life. She said</p> <p>20 that he tried -- really, a couple of things that</p> <p>21 stick in my mind, that she tried -- that he tried</p> <p>22 to suffocate her with a pillow and she said that</p>	<p>39</p> <p>1 MS. VASQUEZ: Objection, vague and</p> <p>2 ambiguous as to time.</p> <p>3 A. I don't recall. L; F/A; SP;</p> <p>4 Q. Okay. Do you recall that there was lack of pers.</p> <p>5 something broken on the bed, that it -- something know.</p> <p>6 was wrong with the bed?</p> <p>7 MS. VASQUEZ: Objection, vague and</p> <p>8 ambiguous, asked and answered.</p> <p>9 A. I recall some -- some damages, yes. I</p> <p>10 don't recall exactly what damages.</p> <p>11 Q. All right. And just so I'm clear, you</p> <p>12 recall damage to the bed; is that correct?</p> <p>13 MS. VASQUEZ: Objection, asked and</p> <p>14 answered --</p> <p>15 A. Correct.</p> <p>16 MS. VASQUEZ: -- assumes facts not in</p> <p>17 evidence.</p> <p>18 Q. Thank you.</p> <p>19 MS. BREDEHOFT: Alex, can you take that</p> <p>20 down, please.</p> <p>21 And could you bring up, please, Exhibit</p> <p>22 Number 10.</p>
<p>38</p> <p>1 she thought she was going to die.</p> <p>2 That's really the thing that stuck into</p> <p>3 my mind, is the suffocating with the pillow.</p> <p>4 Q. What, if anything, do you recall about</p> <p>5 Amber talking about being dragged across the room</p> <p>6 by her hair?</p> <p>7 MS. VASQUEZ: Objection, leading,</p> <p>8 assumes facts not in evidence, calls for</p> <p>9 hearsay.</p> <p>10 A. Amber described the fight. There were</p> <p>11 some -- there was some hair dragging.</p> <p>12 And that I remember specifically because</p> <p>13 we did hair and makeup the night after. And I</p> <p>14 remember more about the -- the night of James</p> <p>15 Corden than I remember the night before.</p> <p>16 Q. Okay. Okay. Thank you.</p> <p>17 There's two pictures here, I think, on</p> <p>18 this particular exhibit. So I'm just going to</p> <p>19 show you both of them. They're very similar.</p> <p>20 But do you -- do you recall seeing --</p> <p>21 did the bed look something like this with the --</p> <p>22 the broken area on it?</p>	<p>40</p> <p>1 (Exhibit 10 was marked for</p> <p>2 identification and is attached to the</p> <p>3 transcript).</p> <p>4 BY MS. BREDEHOFT:</p> <p>5 Q. While he's doing that, Ms. Inglessis,</p> <p>6 what do you recall observing on Amber Heard that</p> <p>7 night?</p> <p>8 A. Of what night?</p> <p>9 MS. VASQUEZ: Objection, vague and</p> <p>10 ambiguous as to time, assumes facts not in</p> <p>11 evidence and misstates her testimony.</p> <p>12 A. What night?</p> <p>13 Q. On the evening of December 15th, 2015,</p> <p>14 do you recall observing -- what do you recall</p> <p>15 observing about Amber Heard and her physical</p> <p>16 appearance?</p> <p>17 MS. VASQUEZ: Same objections, compound.</p> <p>18 A. I do not recall.</p> <p>19 I do not recall any -- any injuries that</p> <p>20 night.</p> <p>21 Q. Okay. I'm going to -- I'm going to ask IC/ vague &</p> <p>22 you to take a look at what has been raised here. ambig.</p>

H; F/A;
SP; lack
of pers.
know.

H; F/A;
SP; lack
of pers.
know.

<p>41</p> <p>1 It's Exhibit Number 10.</p> <p>2 Do you recognize this, this photo?</p> <p>3 MS. VASQUEZ: Objection, vague and</p> <p>4 ambiguous.</p> <p>5 A. What you mean? Just rephrase. Repeat</p> <p>6 the question.</p> <p>7 Q. Do you remember seeing a clump of hair</p> <p>8 on the carpet on the night of December 15th at</p> <p>9 Amber Heard's penthouse?</p> <p>10 MS. VASQUEZ: Objection --</p> <p>11 A. No.</p> <p>12 MS. VASQUEZ: -- assumes facts not in</p> <p>13 evidence.</p> <p>14 Q. Okay.</p> <p>15 A. No.</p> <p>16 Q. Then take this one down.</p> <p>17 MS. BREDEHOFT: And, Alex, if I could</p> <p>18 ask you to bring back Exhibit Number 4 again.</p> <p>19 You know what? I'm...</p> <p>20 BY MS. BREDEHOFT:</p> <p>21 Q. Now, let's -- so how long did you stay</p> <p>22 at the penthouse on the evening of December 15th?</p>	<p>43</p> <p>1 Q. Okay. And what do you recall</p> <p>2 discussing -- do you recall any discussions with</p> <p>3 Amber Heard about whether she should even go on</p> <p>4 the show?</p> <p>5 MS. VASQUEZ: Objection, leading,</p> <p>6 assumes facts not in evidence, lack of</p> <p>7 foundation and calls for hearsay.</p> <p>8 A. Yes.</p> <p>9 Q. What do you recall?</p> <p>10 MS. VASQUEZ: Same objections.</p> <p>11 A. So basically, the morning of the James</p> <p>12 Corden show -- so how things work in my job is I</p> <p>13 get a call -- you know, I get booked and then I</p> <p>14 get a call from an agent and then I get what we</p> <p>15 call a call sheet which means basically I have to</p> <p>16 be at my client's house at a certain time to do my</p> <p>17 job.</p> <p>18 The morning, obviously, I knew what</p> <p>19 happened the night before. But I remember the</p> <p>20 morning of December 16th where my agent called me</p> <p>21 and said, well, she -- you -- that might be</p> <p>22 canceled, the show might be canceled, back and</p>
<p>42</p> <p>1 A. I don't recall.</p> <p>2 MS. VASQUEZ: Objection, assumes facts</p> <p>3 not in evidence, misstates her testimony.</p> <p>4 Q. I'm sorry.</p> <p>5 A. I don't recall.</p> <p>6 Q. Okay. Then you came back on the</p> <p>7 evening -- or you came back on December 16th; is</p> <p>8 that correct?</p> <p>9 MS. VASQUEZ: Objection, vague and</p> <p>10 ambiguous.</p> <p>11 Q. All right. I'll ask it more</p> <p>12 specifically.</p> <p>13 A. Correct.</p> <p>14 Q. On December 6 -- on December 16, 2015,</p> <p>15 did you return to Amber Heard's penthouse?</p> <p>16 A. Yes.</p> <p>17 Q. Thank you.</p> <p>18 And why did you come to Amber Heard's</p> <p>19 penthouse on December 16th?</p> <p>20 A. It was the James Corden show. She had</p> <p>21 an appearance. So I -- I went -- I came back to</p> <p>22 work.</p>	<p>44</p> <p>1 forth, back and forth; see if she was going to H;</p> <p>2 attend or not attend. Obviously, I had -- I was opinion;</p> <p>3 preview of what happened so it wasn't surprise to obj to</p> <p>4 me. But we -- you know, e-mailed back and forth form; AF</p> <p>5 with my agent and my agent I am assuming with</p> <p>6 Amber's publicist to see if she decide to attend</p> <p>7 the James Corden show. Eventually, she did decide</p> <p>8 to attend it so I went to the penthouse to do the</p> <p>9 makeup.</p> <p>10 Q. Okay. And when you arrived at the</p> <p>11 penthouse on December 16, please describe for me</p> <p>12 what you observed about Amber Heard's face and any</p> <p>13 injuries.</p> <p>14 MS. VASQUEZ: Objection, assumes facts</p> <p>15 not in evidence, compound.</p> <p>16 A. When I came to the penthouse on December</p> <p>17 16 to do Amber's makeup, she had injuries. She</p> <p>18 had two light like -- I don't know how -- I don't</p> <p>19 know -- I mean, I am not a medical expert, I don't</p> <p>20 know how I would describe them.</p> <p>21 But it could have looked like somebody</p> <p>22 had head-butted her lightly so she had the</p>

Opinion; H; F/A; SP	<p>45</p> <p>1 discoloration here under both eyes and the</p> <p>2 bridge – and the bridge of the nose and she had</p> <p>3 what I would call a split lip or something on her</p> <p>4 lip, like a gash or a split lip.</p> <p>5 Q. Okay. I'm going to ask you --</p> <p>6 MS. BREDEHOFT: Alex, if you can take</p> <p>7 down number 4 and I'm going to ask you to</p> <p>8 bring up number 11.</p> <p>9 (Exhibit 11 was marked for</p> <p>10 identification and is attached to the</p> <p>11 transcript).</p>	<p>47</p> <p>1 take that one down and if we can go to</p> <p>2 Exhibit Number 12.</p> <p>3 (Exhibit 12 was marked for</p> <p>4 identification and is attached to the</p> <p>5 transcript).</p> <p>6 BY MS. BREDEHOFT: Vague &</p> <p>7 Q. Ms. Inglessis, I'm going to ask you to ambig.; F/A;</p> <p>8 take a look at what has been marked as Exhibit SP; lack of</p> <p>9 Number 12. Do you recognize that as Amber Heard pers.</p> <p>10 in the picture? know.; H</p> <p>11 A. Yes.</p>
Vague & ambig.	<p>12 Q. Ms. Inglessis, I'm going to ask you to</p> <p>13 look at what has been marked as Exhibit Number 11.</p> <p>14 Do you recognize this photo as being Amber Heard's</p> <p>15 head?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. And could you please describe for</p> <p>18 me what -- what this photo is -- is showing?</p> <p>19 A. It's showing --</p> <p>20 MS. VASQUEZ: Objection, vague and</p> <p>21 ambiguous.</p> <p>22 A. It's showing -- it's showing a chunk of</p>	<p>12 Q. Okay. And can you describe what is</p> <p>13 depicted right along her scalp there?</p> <p>14 MS. VASQUEZ: Objection, calls for</p> <p>15 speculation, assumes facts not in evidence.</p> <p>16 A. I don't know.</p> <p>17 Q. Do -- do you recall that there was some</p> <p>18 bruising along the scalp and some pus, for lack of</p> <p>19 a better word?</p> <p>20 MS. VASQUEZ: Objection, compound,</p> <p>21 assumes facts not in evidence, leading.</p> <p>22 A. I don't recall.</p>
Opinion; H; F/A; SP	<p>46</p> <p>1 missing hair.</p> <p>2 Q. Okay. And what, if anything, did you</p> <p>3 observe on December 16 about Amber Heard missing a</p> <p>4 chunk of hair?</p> <p>5 MS. VASQUEZ: Objection, assumes facts</p> <p>6 not in evidence.</p> <p>7 A. Well, what I remember is we did --</p> <p>8 myself, the hairdresser Adir Abigail and Amber, we</p> <p>9 talked about it. So as we did makeup Amber --</p> <p>10 obviously, I was a preview of what happened, but</p> <p>11 the hairdresser wasn't so she described what</p> <p>12 happened to the hairdresser.</p> <p>13 And I remember this because she showed</p> <p>14 it to us and I looked at the head. (Inaudible due</p> <p>15 to electronic interference). Adir was doing the</p> <p>16 makeup. And we talked about that chunk of hair</p> <p>17 missing on top of her hair -- on top her head.</p> <p>18 Q. Okay.</p> <p>19 A. And how it happened.</p> <p>20 Q. Okay. Thank you. Thank you very much.</p> <p>21 And I'm going to --</p> <p>22 MS. BREDEHOFT: And Alex, if you can</p>	<p>48</p> <p>1 Q. Do you recall whether you had to do</p> <p>2 anything by way of makeup to cover this area</p> <p>3 that's depicted here on Exhibit 12?</p> <p>4 MS. VASQUEZ: Objection, vague and</p> <p>5 ambiguous, misstates her testimony, asked and</p> <p>6 answered.</p> <p>7 A. I don't recall.</p> <p>8 Q. Okay. Do -- would typically you deal R; vague &</p> <p>9 with that in makeup or would that be the hair ambig.; F/A;</p> <p>10 stylist that would deal with that part? IC</p> <p>11 MS. VASQUEZ: Objection, compound, vague</p> <p>12 and ambiguous.</p> <p>13 A. I mean, it's -- it's in the hairline.</p> <p>14 Typically, it would be the hairdresser. It --</p> <p>15 it's in her hairline. I mean, it's not -- I -- I</p> <p>16 wouldn't put makeup on there.</p> <p>17 I mean, I don't recall, but I wouldn't</p> <p>18 put makeup on her hairline anyway.</p> <p>19 Q. Okay. That's fair. Thank you.</p> <p>20 All right. Let's -- let's go to Exhibit</p> <p>21 Number 14.</p> <p>22</p>

Transcript of Melanie Inglessis
Conducted on February 2, 2021

13 (49 to 52)

<p>49</p> <p>1 (Exhibit 14 was marked for 2 identification and is attached to the 3 transcript). 4 BY MS. BREDEHOFT: 5 Q. Ms. Inglessis, I'm going to ask you to 6 take a look at what has been marked as Exhibit 7 Number 14. Do you recognize the person in this 8 photo? 9 A. Yes. 10 Q. And who is that? 11 A. This is Amber Heard. 12 Q. Okay. And were these -- you -- you just 13 described what you saw on the 16th with respect to 14 Amber Heard's injuries. Does this accurately 15 depict what you saw on Amber Heard on December 16, 16 2015? 17 MS. VASQUEZ: Objection, assumes facts 18 not in evidence, lacks foundation, misstates 19 her testimony, compound. 20 A. Yes. 21 Q. Okay. And then, I'm going to -- 22 MS. BREDEHOFT: Adam (sic) -- I mean</p>	<p>51</p> <p>1 Exhibit 17. 2 MS. BREDEHOFT: Amber -- I mean, Alex, 3 if you can bring up 17 for me, please. 4 (Exhibit 17 was marked for 5 identification and is attached to the 6 transcript). 7 BY MS. BREDEHOFT: 8 Q. And I'm going to ask again, Ms. 9 Inglessis, do you recognize the person in this 10 picture? 11 And I'm going to try to move it along. 12 Is it Amber Heard? 13 A. Yes. 14 Q. Okay. And does this reflect what you 15 saw as well on December 16th, 2015? 16 MS. VASQUEZ: Objection, assumes facts 17 not in evidence, lack of foundation, 18 compound, vague and ambiguous. 19 A. I mean, there's three different -- three 20 pictures with very different light, but yes. 21 Q. Okay. All right. Thank you. 22 Now, do you also recall there being an</p>
<p>50</p> <p>1 Alex, if you could take that down and give me 2 15, please. 3 (Exhibit 15 was marked for 4 identification and is attached to the 5 transcript). 6 BY MS. BREDEHOFT: 7 Q. Ms. -- Ms. Inglessis, I'm going to ask 8 you to take a look at what has been marked as 9 Exhibit 16. Again, do you recognize the person in 10 this photo? 11 A. Yes. 12 Q. And who is that? 13 A. Amber Heard. 14 Q. Okay. And does this picture reflect the 15 injuries that you saw on Amber Heard on December 16 16, 2015? 17 MS. VASQUEZ: Objection, lack of 18 foundation, assumes facts not in evidence, 19 compound. 20 A. Yes. 21 Q. Okay. And then, I'm going to ask you to 22 take a look at one more of those, and that is</p>	<p>52</p> <p>1 injury to Amber -- to Amber Heard's lip? Opinion 2 A. Correct. 3 Q. Okay. 4 MS. BREDEHOFT: I'm going to ask, Alex, 5 if you can bring up number 19. 6 (Exhibit 19 was marked for 7 identification and is attached to the 8 transcript). 9 BY MS. BREDEHOFT: 10 Q. And, Ms. Inglessis, I'm going to ask you 11 to take a look at Exhibit Number 19. And do you 12 recognize the person in this photograph as Amber 13 Heard? 14 A. Yes. 15 Q. And does this picture accurately reflect 16 what you saw on Amber Heard on December 16, 2015? 17 MS. VASQUEZ: Objection, assumes facts 18 not in evidence, compound, vague and 19 ambiguous. 20 A. Yes. 21 Q. Okay. And I'm going to have you take a 22 look at one more of those. I'm almost done.</p>

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<p>53</p> <p>1 MS. BREDEHOFT: Alex, if you can pull up 2 for me Exhibit Number 20, please. 3 (Exhibit 20 was marked for 4 identification and is attached to the 5 transcript). 6 BY MS. BREDEHOFT: 7 Q. And I'm going to ask you again, Ms. 8 Inglessis, if you can take a look at Exhibit 9 Number 20. And can you -- can you recognize this 10 as Amber Heard in this picture? 11 A. I -- I don't know. 12 Q. Okay. Well, I'll tell you what, then we 13 will -- that -- that's fair. That's fair. 14 MS. BREDEHOFT: So let's take that one 15 down, then, Alex. 16 Q. Ms. Inglessis, could you please describe 17 what you did by way of makeup to prepare Amber 18 Heard for the James Corden show on December 16, 19 2015? 20 MS. VASQUEZ: Objection, calls for a 21 narrative. 22 A. Yes.</p>	<p>55</p> <p>1 (Exhibit 22 was marked for 2 identification and is attached to the 3 transcript). 4 BY MS. BREDEHOFT: 5 Q. Ms. Inglessis, if you could look at what 6 has been marked as Exhibit Number 22. Do you 7 recognize Amber Heard in that picture? 8 A. Yes. 9 Q. Okay. And was -- is this the picture of 10 her -- is this a picture of her that evening, 11 December 16, 2015, on the James Corden show? 12 A. Yes. 13 Q. Okay. I think you did a pretty good job 14 on that makeup, by the way. 15 A. Thank you. 16 Q. And did you -- did you have occasion to 17 watch the show that night while Amber was on 18 there? 19 A. Yes. 20 Q. Okay. And how would you describe Amber 21 on that show? 22 MS. VASQUEZ: Objection, vague and</p>
<p>54</p> <p>1 We covered -- you know, I just did 2 makeup, but just a little heavier the way I did 3 it. So we covered, you know, the -- the 4 discoloration or the bruises with a little 5 slightly-heavier concealer, one that has a little 6 more of a peach undertone which I would 7 normally -- don't use on Amber, but peach do 8 cancel blue. So I did that under the eyes. 9 And I -- although Amber always, you 10 know, has a red lip, it's one of her signature 11 look, I remember clearly talking that we had no 12 other option that night but that to use a red 13 blood -- like a really red lipstick to, you know, 14 make sure we could cover up the injuries on the 15 lip. 16 Q. And were you able to cover all of the 17 injuries with the makeup that you applied and as 18 you just described? 19 MS. VASQUEZ: Objection, compound. 20 A. Yes. 21 Q. Okay. I'm going to ask you to take a 22 look at Exhibit Number 22.</p>	<p>56</p> <p>1 ambiguous. 2 MS. BREDEHOFT: That's -- that's fair. 3 BY MS. BREDEHOFT: 4 Q. Let me ask it a different -- a different 5 way. 6 When Amber performed on that show, was 7 it your perception that Amber, quote, "turned it 8 on," end of quote, for the show? 9 MS. VASQUEZ: Objection. 10 I apologize, Elaine. 11 Objection, leading, assumes facts not in 12 evidence, it's vague. 13 MS. BREDEHOFT: That's fair. 14 BY MS. BREDEHOFT: 15 Q. I need to rephrase that one. 16 A. Yes. 17 Q. What, if anything, did you observe on 18 the difference in Amber Heard's demeanor before 19 the show and then on the show? 20 MS. VASQUEZ: Objection, assumes facts 21 not in evidence, it's vague. 22 A. Do I answer?</p>

Vague &
ambig.;
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R; vague
& ambig.;
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lack of
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<p>57</p> <p>1 Q. Yes, you get to this time.</p> <p>2 A. That she had the ability to, you know,</p> <p>3 turn it on, that she -- you know, the ability to</p> <p>4 do her job and -- and perform how she was supposed</p> <p>5 to perform on the show.</p> <p>6 Q. And prior to Amber going on the show and</p> <p>7 while you were working with her on her makeup, how</p> <p>8 would you describe Amber's mood and demeanor?</p> <p>9 MS. VASQUEZ: Objection, compound, vague</p> <p>10 and ambiguous.</p> <p>11 A. Angry, sad, a little erratic. I think</p> <p>12 through waves of emotions, you know.</p> <p>13 Q. Okay. Thank you.</p> <p>14 Is there anything else you can recall</p> <p>15 from that day, December 16, relating to the</p> <p>16 makeup, the hair?</p> <p>17 Anything about that that sticks out to</p> <p>18 you?</p> <p>19 A. No.</p> <p>20 MS. VASQUEZ: Objection, compound, vague</p> <p>21 and ambiguous.</p> <p>22 A. You know, what I mentioned earlier, you</p>	<p>59</p> <p>1 with Amber. So Savannah was there before I</p> <p>2 entered the house, the penthouse. L; R; vague &</p> <p>3 Q. Okay. And do you recall whether ambig; F/A;</p> <p>4 Savannah was hugging Amber when you came in? SP; lack of</p> <p>5 MS. VASQUEZ: Objection, leading. pers. know.</p> <p>6 A. I recall -- I recall opening the</p> <p>7 penthouse -- so there's two penthouses. There's a</p> <p>8 penthouse where she gets ready. So Amber had a</p> <p>9 penthouse where Savannah gets her ready, where all</p> <p>10 Amber's clothes is. If I recall properly, that's</p> <p>11 the penthouse that I enter first, just to say hi,</p> <p>12 before I would go set up in the other penthouse.</p> <p>13 And my recollection is to -- when I R; vague</p> <p>14 entered Amber was crying, looked pretty upset on & ambig.;</p> <p>15 Savannah shoulder or they were like -- you know, I F/A; SP;</p> <p>16 don't know if hugging is the right way, but they lack of</p> <p>17 definitely had a moment where they were together pers.</p> <p>18 and Amber looked really upset. know.</p> <p>19 Q. Okay. Thank you.</p> <p>20 Now, you continued to be Amber's friend</p> <p>21 into 2016; correct, after this happened?</p> <p>22 A. Correct.</p>
<p>58</p> <p>1 know. Nothing more to that.</p> <p>2 Q. Okay. Do you recall whether a Savannah</p> <p>3 Mc- -- or a -- let me ask this differently.</p> <p>4 Do you recall someone named Ms. McMillan</p> <p>5 having any role in -- in helping to prepare Amber</p> <p>6 Heard for that James Corden show that night,</p> <p>7 December 16?</p> <p>8 MS. VASQUEZ: Objection, lack of</p> <p>9 foundation.</p> <p>10 A. Yes.</p> <p>11 Q. What do you recall?</p> <p>12 MS. VASQUEZ: Objection, compound.</p> <p>13 A. Savannah -- Savannah was a stylist.</p> <p>14 Savannah was there the day of the James Corden, as</p> <p>15 she was always there to get her ready before an</p> <p>16 appearance or a show.</p> <p>17 Q. Okay. And did Savannah work on Amber</p> <p>18 before or after you were applying the makeup?</p> <p>19 MS. VASQUEZ: Objection, assumes facts</p> <p>20 not in evidence, calls for speculation.</p> <p>21 A. I don't know if she worked on Amber, but</p> <p>22 when I entered the penthouse 5 Savannah was there</p>	<p>60</p> <p>1 Q. Okay. And did there come a time in May</p> <p>2 of 2016 that you were communicating with Amber by</p> <p>3 text?</p> <p>4 MS. VASQUEZ: Objection, vague and</p> <p>5 ambiguous.</p> <p>6 A. I mean, I couldn't remember. We had</p> <p>7 text all that year.</p> <p>8 Q. Okay. Let's --</p> <p>9 MS. BREDEHOFT: Alex, can you bring up</p> <p>10 Exhibit Number 24, please.</p> <p>11 MS. VASQUEZ: Elaine, I don't want to</p> <p>12 interrupt your flow, but I would appreciate a</p> <p>13 five-minute bathroom break at some point in</p> <p>14 the near future.</p> <p>15 MS. BREDEHOFT: We can do that now.</p> <p>16 Ms. Inglessis, would you like to take a</p> <p>17 break, too? You -- are you feeling -- you</p> <p>18 want to take a five minute, ten minute?</p> <p>19 I don't have a lot left so that's --</p> <p>20 that's a good thing. Okay?</p> <p>21 But -- all right. Let's go ahead and</p> <p>22 take a -- you want to do ten, ten minutes to</p>

<p>61</p> <p>1 give everybody --</p> <p>2 MS. VASQUEZ: Sure. Ten minutes.</p> <p>3 10:20.</p> <p>4 MS. BREDEHOFT: Yeah. Or -- or 1:20, if</p> <p>5 you're out on the east coast, like me.</p> <p>6 MS. VASQUEZ: Okay.</p> <p>7 THE VIDEOGRAPHER: So it is 1:09 p.m.</p> <p>8 We go off the record.</p> <p>9 (A recess was taken).</p> <p>10 THE VIDEOGRAPHER: It is the beginning</p> <p>11 of media number two of the testimony of</p> <p>12 Melanie Inglessis. It is 1:22 p.m. Eastern</p> <p>13 Standard Time. We are back on the record.</p> <p>14 BY MS. BREDEHOFT:</p> <p>15 Q. Ms. Inglessis, I -- I'm going to ask</p> <p>16 just a couple more questions about the makeup that</p> <p>17 you applied on Amber on December 16, 2015, for the</p> <p>18 James Corden show.</p> <p>19 I think you said that you had applied</p> <p>20 some concealer and that you had some peach</p> <p>21 undertones with it to cancel out some blue. Did I</p> <p>22 hear that correctly?</p>	<p>63</p> <p>1 A. Uh-oh. Sorry.</p> <p>2 Can I answer now?</p> <p>3 Q. Yes.</p> <p>4 A. I used a different kind of concealer</p> <p>5 that I wouldn't normally use on Amber, which I</p> <p>6 used a concealer that had peach undertone. Peach</p> <p>7 undertone concealer are more effective to cover</p> <p>8 any darkness of -- of blue undertone than a normal</p> <p>9 concealer.</p> <p>10 Q. Do you know what type of makeup Amber</p> <p>11 Heard typically wore?</p> <p>12 A. Yes.</p> <p>13 MS. VASQUEZ: Objection, vague and</p> <p>14 ambiguous, calls for speculation.</p> <p>15 Q. Go ahead.</p> <p>16 A. Yes.</p> <p>17 Q. Okay. Can you please describe for me?</p> <p>18 A. Yes.</p> <p>19 She's pretty natural. She has a</p> <p>20 concealer from a company called -- or she used to</p> <p>21 have a concealer from a company called "Cle de</p> <p>22 Peau". Her makeup would be pretty simple,</p>
<p>62</p> <p>1 A. (Nods head).</p> <p>2 Q. Okay. Is that a yes? You need to --</p> <p>3 for the court reporter.</p> <p>4 A. Yes.</p> <p>5 Q. Okay.</p> <p>6 A. I'm sorry. I'm sorry. You're -- you're</p> <p>7 breaking up.</p> <p>8 Q. Oh.</p> <p>9 Okay. I was asking about -- I wrote</p> <p>10 down that you said that you had applied on Amber</p> <p>11 concealer, you had some peach undertones to cancel</p> <p>12 blue. Is that what you said?</p> <p>13 MS. VASQUEZ: Objection, leading.</p> <p>14 Q. I'll ask it a different way, then.</p> <p>15 A. Correct.</p> <p>16 Q. So what type -- I have to correct the</p> <p>17 leading objection here.</p> <p>18 So what type of concealer did you apply</p> <p>19 to Amber; and if you used different color tones,</p> <p>20 can you please describe why you used the color</p> <p>21 tones you did?</p> <p>22 MS. VASQUEZ: Objection, compound.</p>	<p>64</p> <p>1 concealer and a little Benefit tint that she used</p> <p>2 on her lips and she used on her cheeks. Very</p> <p>3 (inaudible due to electronic interference).</p> <p>4 Q. Okay. I'm sorry. I lost you a little</p> <p>5 bit there.</p> <p>6 MS. BREDEHOFT: April, did you catch</p> <p>7 everything or did she go in and out or was it</p> <p>8 just me?</p> <p>9 (Thereupon, the above-referred to</p> <p>10 portion of the Record was read back by</p> <p>11 the Court Reporter).</p> <p>12 Q. Okay. "Very"?</p> <p>13 Did you have more to say, Ms. Inglessis?</p> <p>14 I think you cut out -- somebody cut out.</p> <p>15 A. Very natural.</p> <p>16 Q. Okay. Okay. It had a -- a natural look</p> <p>17 to it; correct?</p> <p>18 A. Correct.</p> <p>19 Q. Okay. But there was -- she did wear</p> <p>20 concealer and what you described; correct?</p> <p>21 MS. VASQUEZ: Objection, vague and</p> <p>22 ambiguous as to time, calls for speculation.</p>

Vague &
ambig.;
F/A; SP;
lack of
pers. know

C; L

Vague & ambig.; F/A; SP; lack of pers. know.	<p>1 A. Do you mean in her daily life or that 2 night? 3 Q. In her daily life. 4 MS. VASQUEZ: Calls for speculation. 5 A. Yes. She used -- she has a concealer 6 that she use all the time. She has a couple of 7 products that she uses all the time daily, yes. 8 Well, in daily -- yes, as far as I know.</p>	<p>1 or texting me asking me to call her straight away, 2 and I did. 3 And she said to me that Johnny lawyers 4 would like to talk to me and if I could give them 5 a call. And I remember having this conversation 6 either -- maybe both, via text and also on the 7 phone, about this back and forth of what happened 8 and how we both have very different memory of that 9 day and how I -- you know, my recollection of that 10 conversation is me being -- telling Savannah like 11 I don't understand what happened, you were there, 12 I don't understand -- and her saying her version 13 of the story, my having said mine and I -- and I 14 think we both agreed to kind of -- we had two 15 different version of -- of the day and that was 16 that. 17 But I remember -- I don't know if you 18 have those texts and some -- my conversation being 19 quite not understanding that she didn't see what I 20 saw that day, and how is that possible because she 21 was there; and I would never lie, I would not -- I 22 would not do that and I didn't understand how we</p>	<p>65 67 H; IC; cumul.; H</p>
	<p>9 Q. Okay. Now, did you have occasion to see 10 Amber in the days after December 16 to see what 11 she did to cover up the bruises on the 17th, 18th, 12 19th and thereabouts? 13 MS. VASQUEZ: Objection, assumes facts 14 not in evidence, compound, lack of 15 foundation. 16 A. No. 17 Q. Okay. Did you ever have any 18 conversations with Amber Heard about the different 19 types of color tones to use to cover up darker 20 spots or bruises or swelling, things of that 21 nature? 22 MS. VASQUEZ: Objection, compound, vague</p>	<p>1 and ambiguous, calls for hearsay. 2 A. Not that I recall, no. 3 Q. Okay. Okay. That's fair. 4 Was Savannah McMillan -- did she 5 accompany Amber to the James Corden show? 6 A. I don't think so. I don't recall, but I 7 don't think so. I don't remember. I don't think 8 so, no. 9 Q. Okay. 10 A. I don't recall. 11 Q. Did you ever have -- did you ever have 12 any conversations with Savannah McMillan about 13 that night later? 14 MS. VASQUEZ: Objection, vague and 15 ambiguous, calls for hearsay, assumes facts 16 not in evidence, lack of foundation. 17 A. Yes. 18 Q. What do you recall? 19 MS. VASQUEZ: Same objections. 20 A. I recall specifically a phone call that 21 Savannah -- Savannah and I knew each other from 22 the industry we in. And I remember her calling me</p>	<p>66 68 IC</p>
	<p>1 and ambiguous, calls for hearsay. 2 A. Not that I recall, no. 3 Q. Okay. Okay. That's fair. 4 Was Savannah McMillan -- did she 5 accompany Amber to the James Corden show? 6 A. I don't think so. I don't recall, but I 7 don't think so. I don't remember. I don't think 8 so, no. 9 Q. Okay. 10 A. I don't recall. 11 Q. Did you ever have -- did you ever have 12 any conversations with Savannah McMillan about 13 that night later? 14 MS. VASQUEZ: Objection, vague and 15 ambiguous, calls for hearsay, assumes facts 16 not in evidence, lack of foundation. 17 A. Yes. 18 Q. What do you recall? 19 MS. VASQUEZ: Same objections. 20 A. I recall specifically a phone call that 21 Savannah -- Savannah and I knew each other from 22 the industry we in. And I remember her calling me</p>	<p>1 could have both very different version of that 2 day. 3 MS. VASQUEZ: I am going to move to 4 strike as non-responsive. 5 Q. Thank you. 6 And -- and do you feel confident in what 7 you describe that you saw the day of Amber Heard's 8 injuries on December 16, 2015? 9 MS. VASQUEZ: Objection, vague and 10 ambiguous. 11 A. A thousand percent. 12 Q. Thank you. 13 All right. Now -- 14 A. Without a doubt. 15 Q. Thank you. 16 MS. BREDEHOFT: Now, Alex, could you 17 pull up for me number 24. 18 (Exhibit 24 was marked for 19 identification and is attached to the 20 transcript). 21 BY MS. BREDEHOFT: 22 Q. I'm going to show you, Ms. Inglessis,</p>	<p>Vague & ambig.; cumul.</p>
	<p>9 Q. Okay. 10 A. I don't recall. 11 Q. Did you ever have -- did you ever have 12 any conversations with Savannah McMillan about 13 that night later? 14 MS. VASQUEZ: Objection, vague and 15 ambiguous, calls for hearsay, assumes facts 16 not in evidence, lack of foundation. 17 A. Yes. 18 Q. What do you recall? 19 MS. VASQUEZ: Same objections. 20 A. I recall specifically a phone call that 21 Savannah -- Savannah and I knew each other from 22 the industry we in. And I remember her calling me</p>	<p>1 could have both very different version of that 2 day. 3 MS. VASQUEZ: I am going to move to 4 strike as non-responsive. 5 Q. Thank you. 6 And -- and do you feel confident in what 7 you describe that you saw the day of Amber Heard's 8 injuries on December 16, 2015? 9 MS. VASQUEZ: Objection, vague and 10 ambiguous. 11 A. A thousand percent. 12 Q. Thank you. 13 All right. Now -- 14 A. Without a doubt. 15 Q. Thank you. 16 MS. BREDEHOFT: Now, Alex, could you 17 pull up for me number 24. 18 (Exhibit 24 was marked for 19 identification and is attached to the 20 transcript). 21 BY MS. BREDEHOFT: 22 Q. I'm going to show you, Ms. Inglessis,</p>	<p>IC; H</p>
	<p>1 and ambiguous, calls for hearsay. 2 A. Not that I recall, no. 3 Q. Okay. Okay. That's fair. 4 Was Savannah McMillan -- did she 5 accompany Amber to the James Corden show? 6 A. I don't think so. I don't recall, but I 7 don't think so. I don't remember. I don't think 8 so, no. 9 Q. Okay. 10 A. I don't recall. 11 Q. Did you ever have -- did you ever have 12 any conversations with Savannah McMillan about 13 that night later? 14 MS. VASQUEZ: Objection, vague and 15 ambiguous, calls for hearsay, assumes facts 16 not in evidence, lack of foundation. 17 A. Yes. 18 Q. What do you recall? 19 MS. VASQUEZ: Same objections. 20 A. I recall specifically a phone call that 21 Savannah -- Savannah and I knew each other from 22 the industry we in. And I remember her calling me</p>	<p>1 could have both very different version of that 2 day. 3 MS. VASQUEZ: I am going to move to 4 strike as non-responsive. 5 Q. Thank you. 6 And -- and do you feel confident in what 7 you describe that you saw the day of Amber Heard's 8 injuries on December 16, 2015? 9 MS. VASQUEZ: Objection, vague and 10 ambiguous. 11 A. A thousand percent. 12 Q. Thank you. 13 All right. Now -- 14 A. Without a doubt. 15 Q. Thank you. 16 MS. BREDEHOFT: Now, Alex, could you 17 pull up for me number 24. 18 (Exhibit 24 was marked for 19 identification and is attached to the 20 transcript). 21 BY MS. BREDEHOFT: 22 Q. I'm going to show you, Ms. Inglessis,</p>	<p>IC; H</p>

F/A; SP;
lack of
personal
know.; H

69
1 what has been marked as Deposition Exhibit Number
2 24. And this is dated February 22nd, but I
3 think -- I think that date is off.
4 Do you -- do you remember Amber Heard
5 speaking with you on -- or texting with you on May
6 21st, 2016?
7 A. So those are the two dates that I wasn't
8 sure if I came over or not. Because those are the
9 two main incidents that I remember, an incident in
10 May and an incident in -- in December. And I
11 wasn't sure which day I did or didn't not come.
12 So, obviously, this is the date that she told me
13 not to come. Do I remember the exact day, the
14 date? No. But I remember those texts, correct.
15 Q. Okay. And the first -- the first part
16 of this says, "No, Johnny came over to talk. His
17 mom just died. Then he went sideways, convinced
18 of some crazy shit. Beat on me. Cops were
19 called. They just left. Filing a restraining
20 order. Divorce goes through on Monday. My face
21 looks stupid and swollen. Bad night."
22 Do you see that?

H; F/A;
SP; lack
of pers.
know.

70
1 A. Yes.
2 Q. Okay. And then you say, "You need us to
3 come over now and get you?" And then the next
4 response is, "Cops came back. It's okay. Rock
5 and Josh are helping me. All okay. Sorry I
6 couldn't communicate earlier. I'll text you
7 tomorrow, if that's okay."
8 All right. And then you respond you
9 love her, you're thinking of her.
10 A. Yes.
11 Q. Did you --
12 A. Yes.
13 Q. Did you end up having a -- did you end
14 up having a conversation afterwards with Amber
15 Heard and learn what had happened that night?
16 MS. VASQUEZ: Objection, vague and
17 ambiguous, calls for hearsay.
18 A. Yes.
19 Q. What do you recall Amber Heard saying?
20 MS. VASQUEZ: Objection, calls for
21 hearsay.
22 A. That there was a fight, that -- that

71
1 Johnny Depp was really upset at -- that his mother
2 had died and there was a fight and there was a
3 phone -- a phone in and there just was a big
4 fight.
5 Q. Okay. Now, do you recall seeing Amber
6 through that next week?
7 MS. VASQUEZ: Objection, vague and
8 ambiguous.
9 A. No.
10 Q. Okay.
11 A. I don't recall.
12 Q. Okay.
13 MS. BREDEHOFT: We can take that off
14 now, Alex.
15 Q. Did you ever speak with any of Mr.
16 Depp's attorneys, including specifically Adam
17 Waldman?
18 A. No.
19 MS. VASQUEZ: Objection, compound, lack
20 of foundation.
21 Q. Okay.
22 A. No.

H; F/A;
SP;
lack of
pers.
know.

72
1 Q. Did Mr. Waldman ever try to contact you?
2 MS. VASQUEZ: Objection, assumes facts
3 not in evidence.
4 A. Through -- through a friend, yes.
5 Q. Ah. And please describe what you mean
6 by that.
7 A. Mr. Waldman gave his phone number -- I
8 have Mr. Waldman's number. He's given his number
9 through Amanda de Cadenet, and she gave it to me.
10 And I've never done anything with it.
11 Q. Okay. Thank you.
12 I just have a couple more questions
13 here.
14 In the -- after that May 21 incident, on
15 May 27 Amber went to court and obtained a domestic
16 violence restraining order. And that was the
17 beginning of quite a -- an active press frenzy of
18 the domestic relations situation between Mr. Depp
19 and Ms. Heard. And I'm just going to ask you a
20 couple questions in that time frame, but I wanted
21 to give you the context that I was talking about.
22 So this is my fresh question. Okay?

R

ambig.

[illegible]

<p>77</p> <p>1 Q. Okay. That's fine. All right. 2 MS. BREDEHOFT: Alex, can you bring up 3 Exhibit Number 25, please. 4 (Exhibit 25 was marked for 5 identification and is attached to the 6 transcript). 7 BY MS. BREDEHOFT: 8 Q. I'm going to ask you to take a look at 9 what has been marked as Exhibit 25. And this is 10 an e-mail exchange between you and Amber Heard. 11 And this is on July 26, 2016 (sic). 12 And the first part is Amber I believe 13 writing to you. And she -- she indicates in 14 there, "I'm about to take off. So I couldn't talk 15 earlier. I had a complete mental breakdown before 16 I left. Johnny begging me, begging me not through 17 with the divorce, to stay and talk to them, to 18 work it out. I have been and was crashed. So 19 confused angry and hurt and so lost and scared. 20 Plus, having to move. Yesterday was the first day 21 I saw him in mediation. I have talked to him 22 today. He's begging me to let him fix everything</p>	<p>79</p> <p>1 mediation. So hard." And you say, "I had no 2 mediation -- no idea mediation was a face to face 3 with him. Babe, I can only imagine the pain, 4 stress, anxiety, sadness and confusion that you 5 are experiencing right now. And I know you are 6 mourning the end of your marriage and try to 7 process everything. I'm sure mediation was 8 extremely difficult as you still love him. But, 9 please don't doubt yourself as far." 10 Do you recall writing that? 11 A. Yeah, I don't recall writing it. 12 Q. Okay. 13 A. But I remember feeling scared for my 14 friend. 15 Q. I guess what I'm asking -- I'm sorry. 16 I -- I lost that. Could you say that again? I 17 think you went in and out. 18 A. I said I don't really exactly remember 19 the days, but I remember the feeling of -- of 20 feeling scared for my friend, yes. 21 Q. Okay. Thank you. 22 MS. BREDEHOFT: And let's go -- can we</p>
<p>78</p> <p>1 and delay my flight to talk tonight. I left 2 instead. But I left my heart behind. I don't 3 know what's right when everything feels so wrong." 4 Do you remember Amber sending that to 5 you? 6 MS. VASQUEZ: Objection, assumes facts 7 not in evidence, lack of foundation, calls 8 for hearsay. 9 A. Do I remember the exact text? No. But 10 you have it here, so yes. 11 Q. I mean -- 12 A. Yeah. I mean, I remember -- I remember 13 those -- I remember that feeling that she had and, 14 as I said, I do remember the back and forth she 15 went through. You know, I don't recall this exact 16 text on that day, but you have it on file, so you 17 have proof of it, yes. 18 Q. Okay. 19 MS. BREDEHOFT: Alex, can I take 20 control, please? Just so I can move it down. 21 Q. And then you say, "Holy shit. You are 22 talking to him, my baby." She said, "Yeah,</p>	<p>80</p> <p>1 pull up 26 now, please. 2 (Exhibit 26 was marked for 3 identification and is attached to the 4 transcript). 5 BY MS. BREDEHOFT: 6 Q. I'm going to show you what is marked as 7 Deposition Exhibit Number 26. And -- and this is 8 a continuation of that same text message. 9 You said, "Don't doubt yourself as far 10 as the decision that you -- that you courageously 11 made. First of all, can we be sure he really is 12 genuine as far as wanting you back? Can he make a 13 statement then, acknowledging the domestic 14 violence, that he needs help and that he is 15 willing to get it to have you back? That would be 16 the only way you should even think about it. I am 17 sure he still loves you, but there is so much at 18 stake for him and he has so much to lose. Is it a 19 plot by his people? Even if he wanted you back 20 truly, his people will eventually fuck you. That, 21 I am pretty sure about. J.D. is bigger than just 22 him. Then, where do you go from here? Secondly,</p>

H; F/A;
SP

F/A; SP;
lack of
pers. know.
vague &
ambig.; H

H

F/A; SP;
lack of
personal
know.; H

H; R;
F/A; SP

Transcript of Melanie Inglessis
Conducted on February 2, 2021

21 (81 to 84)

IC; F/A; H; argum. R	<p>81</p> <p>1 going back would only be temporary. He will not 2 get sober. He will continue to beat on you and 3 will eventually suck the life out of you or 4 actually kill you. If he doesn't kill you, your 5 spirit will be gone -- broken, your youth and 6 beauty gone, your career and reputation over. The 7 only healthy way out is to move forward and 8 continue what you have started. Rebuilt yourself. 9 You will find love again. You are worthy of the 10 most beautiful love. Not to go back to an addict 11 that beats on you." 12 Did you write those words?</p>	<p>83</p> <p>1 MS. BREDEHOFT: I'm going to -- Alex, if 2 you can take that one away and go to Exhibit 3 Number 28, which is my last exhibit. 4 (Exhibit 28 was marked for 5 identification and is attached to the 6 transcript). 7 BY MS. BREDEHOFT: 8 Q. I'm going to show you what has been F/A; H 9 marked as Deposition Exhibit Number 28. And it's 10 an e-mail communication between you and Amber on 11 July 31st, 2016. And I'm going to -- 12 MS. BREDEHOFT: Alex, could you give Ms. 13 Inglessis control so she can just read it. 14 Q. I don't want to -- I just want to let 15 you read it.</p>
L; R	<p>13 A. Yes. 14 Q. And I -- I take it from your response 15 today, you still feel very emotional about this? 16 It is very difficult for you; isn't it? 17 MS. VASQUEZ: Objection, leading. 18 A. It's not difficult for me, no, now, no. 19 It just remind me of the time how I felt, yes. 20 Q. Okay. Thank you. 21 MS. BREDEHOFT: All right. Let's go and 22 let's bring up number 27, please.</p>	<p>16 A. I can read it. 17 Q. Okay. You can read it. Okay. That's 18 great. 19 A. Yeah, I can read it. 20 Q. And I -- so I'm just going to direct 21 your attention to a couple things in there. And 22 I --</p>
F/A; vague & ambig.; H	<p>82</p> <p>1 Q. I really am almost done. Just a couple 2 more. I'm so sorry. I know this is difficult. 3 (Exhibit 27 was marked for 4 identification and is attached to the 5 transcript). 6 BY MS. BREDEHOFT: 7 Q. Ms. Inglessis, I'm going to ask you to 8 look at what has been marked as Deposition Exhibit 9 Number 27, a continuation of the e-mail and the 10 text chain between you and Amber. 11 And you say in here, "Also, do remember 12 his major character flaws. He will never change. 13 The Jack episode being one of them. You were so 14 hurt." 15 Do you recall what that was about? 16 MS. VASQUEZ: Objection, vague and 17 ambiguous, calls for hearsay. 18 A. Actually, I do not recall, no. The 19 Jack -- 20 Q. Okay. 21 A. No. Sorry. 22 Q. Okay. All right.</p>	<p>84</p> <p>1 MS. BREDEHOFT: So, Alex, I'm going to 2 take control back so I can highlight them 3 since she doesn't need it. Okay? Thank you. 4 BY MS. BREDEHOFT: 5 Q. All right. It says, "I understand you 6 are torn as you still love your husband and you 7 miss him, but I really don't think it's a good 8 idea, you even considering going back." 9 That's how you felt at that time and 10 that's what you advised Ms. Heard; is that 11 correct? 12 A. (Nods head). 13 Q. Okay. 14 A. Correct. 15 Q. And then -- thank you. 16 And then you say, "First and foremost, 17 how can you go back? What is there to go back to? 18 What future do you see? It's doomed. There's 19 nothing good or -- or happy or healthy that is 20 going to come out of you going back. Nothing at 21 all. You are just delaying the inevitable." 22 Is that how you felt at that time, in --</p>
		<p>L; C; H</p> <p>H</p>

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30102

Transcript of Melanie Inglessis
Conducted on February 2, 2021

22 (85 to 88)

<p>85</p> <p>1 MS. VASQUEZ: Objection, vague and 2 ambiguous, lack of foundation, calls for 3 hearsay. 4 A. Yes. 5 Q. Okay. And then you say, quite 6 eloquently, "He is a mad man. Always has been. 7 Always will be. He is a delusional addict, with a 8 violent behavior when intoxicated and he beats on 9 you. He has demons and will suck the life and the 10 youth out of you and spit you out in a couple of 11 years, if it even lasts that long or doesn't end 12 more tragically. You go back, you will fight 13 again and he will beat on you again except the 14 next time the public won't believe you and your 15 friends and your sister won't be next door. You 16 will be surrounded by his people only. Who knows 17 what kind of fuckin' crazy shit could happen. 18 Every move that you will make will mostly -- 19 likely be documented and recorded just in case. 20 Your life will be hell." 21 Is that how you felt at that time and 22 what you communicated to Amber Heard?</p>	<p>87</p> <p>1 MS. VASQUEZ: Okay. Perfect. 2 Thank you. 3 EXAMINATION 4 BY MS. VASQUEZ: 5 Q. Good morning, Ms. Inglessis. Thank you 6 for being here today. 7 I want to start out by asking you: Are 8 you here because you've been subpoenaed to be here 9 at your deposition? 10 A. Yes. 11 Q. All right. And do you recall receiving 12 a subpoena from Ms. Heard's counsel? 13 A. Yes. 14 MS. BREDEHOFT: Objection, both leading 15 and hearsay and inaccurate. 16 But go ahead. 17 MS. VASQUEZ: It's inaccurate? 18 Q. All right. Are you here on your 19 freewill? 20 A. No. 21 Q. Okay. What do you mean by that? 22 A. Well, what do you mean by that?</p>
<p>86</p> <p>1 MS. VASQUEZ: Objection, calls for 2 hearsay, compound, vague and ambiguous. 3 A. Yes. 4 Q. And you end it with, "Please make the 5 right choices towards healing and rebuilding 6 versus self-destruction." 7 Were those your words at that time to 8 Amber Heard? 9 A. Yes. 10 MS. VASQUEZ: Objection, the document 11 speaks for itself. 12 A. Yes. 13 Q. Yeah. 14 Okay. What -- 15 MS. BREDEHOFT: I have no further 16 questions. Thank you very much. I 17 appreciate it. 18 THE WITNESS: Thank you. 19 MS. VASQUEZ: If I can ask the 20 videographer how long we have on the tape 21 that we've been going. 22 THE VIDEOGRAPHER: One hour, 21 minutes.</p>	<p>88</p> <p>1 Q. Why are you here, then? 2 A. Because I've been subpoenaed. 3 Q. Okay. Do you recall who subpoenaed you? 4 A. Amber, I'm assuming. I mean, I'm not a 5 legal -- I have no knowledge, but I'm assuming 6 Amber Heard subpoenaed me. 7 Q. Did you speak with any attorneys -- 8 A. No. 9 Q. -- for Ms. Heard ahead of your 10 deposition today? 11 A. None. 12 Q. Did you speak with Ms. Heard ahead of 13 your deposition today? 14 A. No. 15 Q. When was the last time you spoke with 16 Ms. Heard? 17 A. I spoke with Amber extremely briefly 18 maybe a month ago. Extremely briefly. 19 Q. And what was your conversation 20 regarding? 21 A. She called me from a -- not her number 22 so I answered. And she cried. And I said I</p>

F/A; C;
H; SP;
lack of
personal
know.

H; F/A

SP

R; F/A;
SP; lack
of pers.
know.

89
1 didn't really want to have anything to do with
2 her. And that was it.
3 Q. What was Ms. Heard crying about?
4 A. I think through the -- I don't know.
5 That's a -- you have to ask her.
6 Q. Why did she tell you she was upset?
7 A. She just -- she -- I mean, it was just
8 not even -- I don't know why she was calling me.
9 I don't know what she wanted to tell me. I was
10 just not willing to listen, so I did not engage in
11 a long conversation with her.
12 She sounded upset on the phone and I
13 just didn't want to engage in it so I just, you
14 know, made it really short.
15 Q. Why did you not want to engage with
16 her --
17 A. What she wanted to talk about, what
18 exactly, I don't know.
19 Q. I apologize, Ms. Inglessis. I
20 interrupted you.
21 A. That's okay.
22 Q. Why did you not want to engage with her,

90
1 with Ms. Inglessis?
2 A. Because I do not wish to continue my
3 friendship with Amber or -- or my work
4 relationship with Amber.
5 Q. And why is that the case?
6 A. Because I just did -- all of this has
7 been really difficult on me and -- I mean, it's
8 been difficult on a lot of people and I just --
9 it's just too much. I just don't -- you know.
10 I gave birth two years ago and I had a
11 really bad postpartum. And since then, I just
12 have no -- I just have no interest in any drama,
13 if I can call it, or anything that would make my
14 life a little harder than I feel it is since I
15 have postpartum since I gave birth two years ago.
16 So I basically -- long story short, I
17 cut out client and friends that I feel are a
18 little heavier, that need a little more care, that
19 I was able to give before that I can't give since
20 I gave birth.
21 Q. Did you and Ms. Heard have a specific
22 falling out that resulted in the end of your

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1 friendship and working relationship?
2 A. No.
3 MS. BREDEHOFT: Objection, leading.
4 Go ahead.
5 A. No.
6 Q. Do you believe that Ms. Heard -- the
7 purpose of Ms. Heard's call to you about a month
8 ago was in relation to your testimony today in SP
9 this case?
10 MS. BREDEHOFT: Objection, calls for
11 speculation.
12 Go ahead.
13 A. I don't know.
14 Q. Did she tell you that she wanted you to
15 testify for her in this case?
16 MS. BREDEHOFT: Objection, leading.
17 Go ahead.
18 A. On the phone call, no.
19 Q. Did Ms. Heard tell you that she had
20 changed her number?
21 MS. BREDEHOFT: Objection, leading.
22 Go ahead.

92
1 A. No.
2 Q. Did you find it strange that she had
3 called you from a different number?
4 MS. BREDEHOFT: Objection, leading and
5 hearsay, foundation.
6 Go ahead.
7 A. Strange? No. She probably knew I
8 probably maybe would not have answered if it -- if
9 it was her number.
10 Q. When did you first tell Ms. Heard that
11 you were no longer interested in -- in having her
12 as a client and being friends with her?
13 MS. BREDEHOFT: Objection, leading.
14 Go ahead.
15 A. That -- that phone call, about a month
16 ago.
17 Q. That was the first time you told Ms.
18 Heard that you were not going to be serving as her
19 makeup artist anymore or being a friend to her; is
20 that correct?
21 MS. BREDEHOFT: Objection, leading.
22 Go ahead.

MS L SP R F/A H	<p>93</p> <p>1 A. It wasn't said as exactly so.</p> <p>2 Q. How was it said?</p> <p>3 A. Well, I just told Amber that, you know,</p> <p>4 I wish her well and I just -- just I have no</p> <p>5 interest in continuing a relationship, whether it</p> <p>6 is work-wise or friendship-wise.</p> <p>7 Q. And again, I'm sorry to keep harping on</p> <p>8 this. But is there a specific reason other than</p> <p>9 the birth of your child and the postpartum issues</p> <p>10 that you described?</p> <p>11 And you have my sincerest sympathies,</p> <p>12 Ms. Inglessis.</p> <p>13 A. Thank you.</p> <p>14 Q. Is there any specific reason other than</p> <p>15 that that you decided not to the pur- -- not to</p> <p>16 continue a relationship with Ms. Heard --</p> <p>17 A. No.</p> <p>18 Q. -- both as a client and friend?</p> <p>19 MS. BREDEHOFT: Objection, leading.</p> <p>20 Go ahead.</p> <p>21 A. No.</p> <p>22 Q. You testified earlier that you assumed</p>	<p>95</p> <p>1 answered if -- if it came from her number.</p> <p>2 Q. And she would have had this information</p> <p>3 before she called you a month ago?</p> <p>4 MS. BREDEHOFT: Objection, leading and</p> <p>5 hearsay, foundation.</p> <p>6 A. Well, we've had no contact in nearly two</p> <p>7 years, so I'm assuming that's why.</p> <p>8 Q. And why have you had no -- nearly no</p> <p>9 contact in two years?</p> <p>10 A. For what I mentioned earlier, my -- you</p> <p>11 know, my child is two-and-a-half years. So last</p> <p>12 time I saw Amber was probably two years ago.</p> <p>13 Because of that, I think, you know, friends -- it</p> <p>14 fizzled out. It fizzled out. I don't think --</p> <p>15 nothing happened specifically before. It just</p> <p>16 fizzled out kind of the way it has.</p> <p>17 Q. So other than a phone call placed by Ms.</p> <p>18 Heard about a month ago, it's your testimony -- do</p> <p>19 I understand your testimony to be that you have</p> <p>20 yet to -- you have not spoken with anyone from Ms.</p> <p>21 Heard's legal team ahead of your deposition?</p> <p>22 A. Correct. Correct.</p>
	<p>94</p> <p>1 Ms. Heard called you from a different number</p> <p>2 because she would have a -- known that you</p> <p>3 wouldn't have picked up. That indicates, to me at</p> <p>4 least, that Ms. Heard was aware that you had no</p> <p>5 interest in being her friend or continuing a</p> <p>6 working relationship with her prior to the phone</p> <p>7 call a month before?</p> <p>8 A. (Nods head).</p> <p>9 Q. Is that true?</p> <p>10 MS. BREDEHOFT: Objection, leading,</p> <p>11 foundation, hearsay.</p> <p>12 Go ahead.</p> <p>13 Calls for speculation, as well.</p> <p>14 A. I don't know what she thinks. You have</p> <p>15 to ask her that.</p> <p>16 Q. Why did you think she -- she was calling</p> <p>17 from a different number?</p> <p>18 MS. BREDEHOFT: Objection, hearsay,</p> <p>19 foundation.</p> <p>20 Go ahead.</p> <p>21 A. What I said earlier, just because she's</p> <p>22 probably knowing that I -- I might not have</p>	<p>96</p> <p>1 Q. Did you speak to any British lawyers</p> <p>2 ahead of your testimony in the UK?</p> <p>3 A. British lawyer?</p> <p>4 MS. BREDEHOFT: Leading, hearsay.</p> <p>5 Go ahead. I'm sorry. Go ahead.</p> <p>6 A. I don't -- I don't recall a British</p> <p>7 lawyer specifically.</p> <p>8 Q. Do you recall speaking to anybody ahead</p> <p>9 of your testimony in the United Kingdom?</p> <p>10 A. Yes.</p> <p>11 Q. Who did you speak with?</p> <p>12 A. Well, ahead of the testimony in London,</p> <p>13 we -- there was a lawyer that was provided, I'm</p> <p>14 assuming, by Amber Heard for her witness. Which</p> <p>15 at that time I took advantage of to help me</p> <p>16 because I've never testify, I never been in court</p> <p>17 of law. So I had communication with -- I don't</p> <p>18 remember her name, and she was my lawyer for that</p> <p>19 trial.</p> <p>20 Q. Did she -- did this lawyer tell you that</p> <p>21 she represented Ms. Heard in the UK proceeding?</p> <p>22 MS. BREDEHOFT: Objection, leading and</p>

R; F/A;
SP; lack
of pers.
know.; H

Transcript of Melanie Inglessis
Conducted on February 2, 2021

25 (97 to 100)

<p>1 hearsay and confusing. 2 But go ahead. 3 A. She wasn't. No. 4 Q. Who did she tell you she represented? 5 A. Amber's -- Amber's witness, which would 6 be me -- I mean, I don't know who else she 7 represent, whether it is Rocky or IO or Josh, I 8 have no idea. But to my understanding, she was a 9 lawyer who help Amber witness be prepared for the 10 trial. 11 Q. And what did she do for you to help 12 prepare you for the trial? 13 MS. BREDEHOFT: Ms. -- 14 A. So -- 15 MS. BREDEHOFT: Ms. Inglessis, I'm going 16 to -- I'm going to jump in here with a pretty 17 significant objection because you've 18 testified that this person was your counsel 19 and you're not represented here today. And 20 Ms. Vasquez does not have the right to ask 21 you questions about your communications with 22 your attorney at that time. There's such a</p>	<p>97</p>	<p>1 MS. BREDEHOFT: I believe that my 2 ethical and professional requirements require 3 me to not let another attorney take advantage 4 of an unrepresented person. 5 I think it's unethical and 6 unprofessional for you to be asking those 7 questions. I would never ask those questions 8 of an unrepresented person. I would never do 9 that. Not in 36 years of practice. 10 And you shouldn't either. 11 BY MS. VASQUEZ: 12 Q. Ms. Inglessis, does Ms. Bredehoft 13 represent you in this deposition? 14 A. No. 15 Q. Okay. Ms. Inglessis, let me ask you 16 some questions relating to the attorney that you 17 spoke with in preparation for your testimony in 18 the United Kingdom. 19 Did -- was it your understanding that 20 this attorney represented you for purposes of your 21 testimony in the United Kingdom? 22 A. Yes.</p>	<p>99</p>
<p>1 thing as attorney-client privilege. And that 2 is your privilege and only you can agree to 3 waive that. 4 So if you say -- do not want to waive 5 your privilege, then you do not have to; and 6 you do not have to answer any questions about 7 your communications with your attorney. And 8 from what I understand from your testimony, 9 that was your attorney. 10 So I just want you to know that because 11 I don't want you to be taken advantage of 12 because you're not represented here today. 13 MS. VASQUEZ: Ms. Bredehoft, do you 14 represent Ms. Inglessis? 15 Ms. Bredehoft, do you represent Ms. 16 Inglessis? 17 MS. BREDEHOFT: Ms. Vasquez, that is an 18 incredibly inappropriate question to ask me. 19 MS. VASQUEZ: It -- it's not. 20 You are giving her advice on the record 21 so I'm asking you, do you represent Ms. 22 Inglessis?</p>	<p>98</p>	<p>1 Q. Did you sign a retainer agreement with 2 this attorney? 3 MS. BREDEHOFT: I am going to object. 4 This is -- this calls for attorney-client 5 communications. 6 Ms. Inglessis -- 7 MS. VASQUEZ: The fact that she signed a 8 retainer agreement or didn't does not call 9 for attorney-client communications. 10 MS. BREDEHOFT: I -- I don't agree. 11 Ms. Inglessis, you do not have to answer 12 this question if you don't want to because 13 she is asking you -- 14 MS. VASQUEZ: Ms. Bredehoft, this is 15 highly inappropriate. You do not represent 16 this witness so you should -- you should not 17 be instructing her to -- to answer my 18 questions or not to answer my questions. 19 If you have an objection to state on the 20 record, you can state that, but your 21 instructions are highly inappropriate. 22 And I'm going to ask the court reporter</p>	<p>100</p>

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Transcript of Melanie Inglessis
Conducted on February 2, 2021

26 (101 to 104)

<p>101</p> <p>1 to please mark the transcript at this point.</p> <p>2 Ms. Inglessis has testified that you do</p> <p>3 not represent her, Ms. Bredehoft so your</p> <p>4 instructions are inappropriate and I --</p> <p>5 MS. BREDEHOFT: I have ethical and --</p> <p>6 and professional obligations and standards</p> <p>7 and I'm going to adhere to them till my dying</p> <p>8 day.</p> <p>9 Ms. Inglessis, she is -- if she asks you</p> <p>10 questions that involve your attorney-client</p> <p>11 communications, you do not have to answer</p> <p>12 them. That's your choice. But you do not</p> <p>13 have to answer them.</p> <p>14 And I have lodged an objection that you</p> <p>15 are calling for attorney-client</p> <p>16 communications, Ms. Vasquez.</p> <p>17 BY MS. VASQUEZ:</p> <p>18 Q. Ms. Inglessis, did you sign any retainer</p> <p>19 agreement with this attorney from the United</p> <p>20 Kingdom that represented you in connection with</p> <p>21 your testimony in the United Kingdom?</p> <p>22 A. I do not wish to answer that.</p>	<p>103</p> <p>1 Q. Do you recall the attorney's name, Ms.</p> <p>2 Inglessis?</p> <p>3 A. I do not recall.</p> <p>4 Q. Ahead of your deposition today, did you</p> <p>5 review any documents?</p> <p>6 A. I did not.</p> <p>7 Q. And just to confirm, you didn't speak</p> <p>8 with your attorney in the United Kingdom or Ms.</p> <p>9 Bredehoft or anyone that represents Ms. Heard</p> <p>10 ahead of your deposition today; correct?</p> <p>11 MS. BREDEHOFT: Object to the form of</p> <p>12 the question and leading.</p> <p>13 But go ahead.</p> <p>14 A. Correct.</p> <p>15 Q. Okay. Did you speak to anyone at all --</p> <p>16 your husband, friends -- about your deposition</p> <p>17 today?</p> <p>18 MS. BREDEHOFT: Objection, leading.</p> <p>19 A. I'm not -- did i speak to my husband</p> <p>20 about my deposition today?</p> <p>21 Q. Yes.</p> <p>22 A. I told to my husband that at 9:00 I have</p>
<p>102</p> <p>1 MS. BREDEHOFT: Same objection, calls</p> <p>2 for attorney-client privilege.</p> <p>3 BY MS. VASQUEZ:</p> <p>4 Q. Did you pay any money to this attorney</p> <p>5 that represented you in the United Kingdom in</p> <p>6 connection with your testimony?</p> <p>7 MS. BREDEHOFT: Objection, that calls</p> <p>8 for attorney-client communication.</p> <p>9 MS. VASQUEZ: Elaine, your objections</p> <p>10 are not well taken.</p> <p>11 And I'm going to ask the court reporter</p> <p>12 to please mark the transcript at this point.</p> <p>13 BY MS. VASQUEZ:</p> <p>14 Q. Ms. Inglessis, Ms. Bredehoft is not your</p> <p>15 attorney unless you choose to make her your</p> <p>16 attorney and that's going to change the -- the</p> <p>17 course of this deposition.</p> <p>18 I assume, your answer is that you refuse</p> <p>19 to answer whether you've paid any money to this</p> <p>20 attorney that represented you in the United</p> <p>21 Kingdom?</p> <p>22 A. Correct.</p>	<p>104</p> <p>1 a deposition so he can take my kid out, yes.</p> <p>2 Q. Okay. Did you speak to anyone else</p> <p>3 about your deposition today?</p> <p>4 A. No.</p> <p>5 MS. VASQUEZ: Alex, may I please have</p> <p>6 you pull up Depp 1, please.</p> <p>7 (Exhibit 29 was marked for</p> <p>8 identification and is attached to the</p> <p>9 transcript).</p> <p>10 Q. Ms. Inglessis, I believe you testified</p> <p>11 prior that you're here because of a subpoena;</p> <p>12 correct?</p> <p>13 A. Correct.</p> <p>14 Q. All right. Do you recall -- first of</p> <p>15 all, have you ever seen what's marked as Inglessis</p> <p>16 29? Have you ever seen this document before?</p> <p>17 MS. VASQUEZ: And, Alex, if maybe you</p> <p>18 can scroll down.</p> <p>19 A. I mean, this is a document that I</p> <p>20 have recognize.</p> <p>21 Q. Do you mind --</p> <p>22 A. I have the document that I was served.</p>

<p>1 I mean, if the document I have here is the same. 2 I mean, are you asking me, is this the 3 exact same document I have in my hand? 4 Q. Hold on a quick second. 5 MS. VASQUEZ: Alex, do you mind going -- 6 scrolling up to the top, please. 7 Q. Ms. Inglessis, do you have a document in 8 front of you that -- that is a subpoena, a 9 deposition subpoena? 10 A. Correct. 11 MS. BREDEHOFT: Objection to the form of 12 the question. 13 Go ahead. 14 A. But I'm assuming -- 15 Q. Do you mind reading for me -- 16 A. Hold on a minute. 17 First of all, you're asking me if I know 18 what a subpoena is or what a subpoena is not. 19 You're asking me legal question. I don't know 20 what is a subpoena document or not. 21 Q. Okay. Okay. We'll -- we'll take it 22 step-by-step.</p>	<p>105</p>	<p>1 A. Where is this leading? 2 Q. Ms. Inglessis, it would make -- make it 3 a little easier if you just let me ask the 4 questions and I will try to be a bit more clear 5 for you. 6 Do you see a document that looks like 7 the document that's on the screen? 8 MS. BREDEHOFT: Objection to the form of 9 the question. 10 Q. In that packet of information that you 11 received. 12 A. I am looking right now. 13 Q. I'll represent to you, Ms. Inglessis, 14 this is what lawyers call a deposition subpoena 15 for personal appearance. 16 A. I don't have in my papers right now a 17 SU -- SUBP 45. I have a SUBP 40 in front of me. 18 And I'm looking, I'm looking. 19 Q. So looking at the SUBP 40 document -- 20 A. Yes. Yes. 21 Q. -- do you mind reading for me and 22 telling me on the top left side of that Subpoena</p>	<p>107</p>
<p>1 You've indicated, Ms. Inglessis, that 2 you have a document. Do you mind reading for 3 us -- 4 A. Correct. 5 Q. In your possession relating to this 6 deposition today; correct? 7 A. Well, there's 20 pages. Which one you 8 want me to read to you? 9 Q. Let's read the first page of the 10 documents that you have in your possession. 11 MS. BREDEHOFT: Objection to the form of 12 the question. 13 Go ahead. 14 THE WITNESS: I am so confused. 15 Superior Court of California, Amber 16 Heard, Petitioner, Case No. 17 I mean, I don't know. You want me to 18 add -- I am just confused right now. What do 19 you want me to read, the whole -- the whole 20 first page? 21 BY MS. VASQUEZ: 22 Q. Do you mind --</p>	<p>106</p>	<p>1 the name that appears there? 2 MS. BREDEHOFT: Objection to the form of 3 the question. 4 Go ahead. 5 Q. Under "attorney or party without 6 attorney." 7 A. So I have two S -- SUBP 40. I was 8 served twice somehow. 9 So SUBP 40, attorney or attorney without 10 attorney, Craig Jamarian. 11 Q. Okay. 12 A. Gordon Rees. 13 Yeah? 14 Q. That's fine. 15 And then the other Subpoena that you 16 have, the other SUBP 40 document, do you mind 17 reading for us the name of the attorney and law 18 firm? 19 A. Craig S. -- Craig J. Mariam, John P. 20 Cogger, Kristin A. Blocher, Gordon Rees Scully 21 Mansukhani, LLP. 22 Q. Got it.</p>	<p>108</p>

<p>109</p> <p>1 A. Okay.</p> <p>2 Q. Thank you very much, Ms. Inglessis.</p> <p>3 Do you recall ever receiving a subpoena</p> <p>4 or -- in particular, this Subpoena that's marked</p> <p>5 on the screen marked as Inglessis 29 with the top</p> <p>6 left attorney firm being Brown Rudnick and Randall</p> <p>7 A. Smith and Camille M. Vasquez?</p> <p>8 MS. BREDEHOFT: Objection.</p> <p>9 Q. Do you recall ever receiving this</p> <p>10 subpoena?</p> <p>11 MS. BREDEHOFT: Objection to the form of</p> <p>12 the question, foundation, hearsay and</p> <p>13 leading.</p> <p>14 But go ahead.</p> <p>15 A. The only two piece of paper that I</p> <p>16 received are the two SUB 040 I have just talked --</p> <p>17 I just mention.</p> <p>18 I would not have received something that</p> <p>19 it would be in front of me. So I -- somehow I got</p> <p>20 served twice. Somebody served me only one piece</p> <p>21 of paper and then the same guy came back a week</p> <p>22 later. I guess he forgot the other piece of</p>	<p>111</p> <p>1 Q. Ms. Inglessis, do you recall ever being</p> <p>2 asked by anyone to collect documents and produce</p> <p>3 them to Ms. Heard or Mr. Depp?</p> <p>4 A. No.</p> <p>5 Q. Okay. Other than your testimony in the</p> <p>6 United Kingdom, have you provided any other</p> <p>7 testimony in relation to Ms. Heard's allegations</p> <p>8 of abuse against Mr. Depp?</p> <p>9 A. Can you clarify what -- what is -- is</p> <p>10 testimony a statement?</p> <p>11 Q. Let me be -- yes. Let me clarify for</p> <p>12 you. We'll -- we'll break it up.</p> <p>13 Other than your oral testimony that you</p> <p>14 gave in the United Kingdom, have you provided any</p> <p>15 testimony, in the form of written testimony or</p> <p>16 oral testimony, in relation to Ms. Heard's</p> <p>17 allegations of abuse against Mr. Depp?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. What type of testimony did you</p> <p>20 provide?</p> <p>21 A. A statement, I believe it's called, with</p> <p>22 Amber -- Amber's lawyer.</p>
<p>110</p> <p>1 paper, where the Zoom meeting was on. So I got</p> <p>2 served here. But that -- all I have here is all I</p> <p>3 have here.</p> <p>4 Q. All right.</p> <p>5 A. I have not received anything else.</p> <p>6 I mean, I'm not -- I don't know what I'm</p> <p>7 supposed to look at. There's a service list.</p> <p>8 There is -- but the front page -- yeah.</p> <p>9 Q. That's okay, Ms. Inglessis. That's</p> <p>10 fine. I appreciate it.</p> <p>11 Did you reach out to any of the</p> <p>12 attorneys listed on either of those subpoenas that</p> <p>13 you've read out when you received them?</p> <p>14 A. I'm sorry. Repeat the question, please.</p> <p>15 Q. Yeah, of course.</p> <p>16 I'll rephrase it.</p> <p>17 Do you recall reaching out or speaking</p> <p>18 with any of the attorneys that are listed on</p> <p>19 either of the subpoena forms?</p> <p>20 A. None. No.</p> <p>21 Q. All right.</p> <p>22 MS. VASQUEZ: Thank you, Alex.</p>	<p>112</p> <p>1 When? My kid was like six months old so</p> <p>2 maybe two years ago.</p> <p>3 Q. Do you recall the name of Ms. Heard's</p> <p>4 lawyer that you provided a written statement to?</p> <p>5 A. I do not recall.</p> <p>6 Q. How did the written statement come about</p> <p>7 that you provided to Ms. Heard's lawyers? SP</p> <p>8 A. I believe Amber must have asked me if I</p> <p>9 could possibly go to a lawyer's office and make a</p> <p>10 statement of what I saw that day.</p> <p>11 Q. Do you have an independent recollection</p> <p>12 of Ms. Heard making that request of you?</p> <p>13 MS. BREDEHOFT: Objection to the form of</p> <p>14 the question and leading.</p> <p>15 A. What do you mean "independent"?</p> <p>16 Q. Do you actually remember Ms. Heard L</p> <p>17 calling you and asking you to meet with her : H</p> <p>18 lawyers to draft a statement in support of her F</p> <p>19 allegations of abuse?</p> <p>20 A. I don't recall.</p> <p>21 MS. BREDEHOFT: Objection.</p> <p>22 THE WITNESS: Sorry.</p>

<div>SP H F</div> <div>113</div> <div>1 MS. BREDEHOFT: That's all right.</div> <div>2 A. I don't recall, but it must have been</div> <div>3 that way. How else -- how else would I have gone?</div> <div>4 So I don't recall the exact call, but if -- she</div> <div>5 must have asked me; if not, I would not have take</div> <div>6 the time to go to his office.</div> <div>7 Q. And to be clear, you did go to an</div> <div>8 attorney's office that represented Ms. Heard to</div> <div>9 provide a written statement; is that correct?</div> <div>10 MS. BREDEHOFT: Objection, leading,</div> <div>11 hearsay, foundation.</div> <div>12 Go ahead.</div> <div>13 A. Repeat the question, please.</div> <div>14 Q. Yeah.</div> <div>15 MS. VASQUEZ: Actually, April, do you</div> <div>16 mind having it read back?</div> <div>17 THE COURT REPORTER: Happy to. Just a</div> <div>18 moment.</div> <div>19 MS. VASQUEZ: Thank you.</div> <div>20 (THEREUPON, the above-referred to</div> <div>21 portion of the Record was read back by</div> <div>22 the Court Reporter).</div>	<div>115</div> <div>1 one visit?</div> <div>2 A. What do you mean "all"?</div> <div>3 Q. Did you speak with the attorney and did</div> <div>4 he draft the statement and did you review it and</div> <div>5 sign it the same day?</div> <div>6 A. I don't recall --</div> <div>7 MS. BREDEHOFT: Objection to the form of</div> <div>8 the question.</div> <div>9 Go ahead.</div> <div>10 A. I don't recall if it was the exact same</div> <div>11 day or the day after or two days after. I don't</div> <div>12 recall.</div> <div>13 Q. Do you recall communicating by e-mail</div> <div>14 perhaps with this attorney in relation to the</div> <div>15 statement?</div> <div>16 A. Yes.</div> <div>17 MS. BREDEHOFT: Object to the form of</div> <div>18 the question.</div> <div>19 Go ahead.</div> <div>20 Q. Do you recall making any changes to the</div> <div>21 draft witness statement ahead of you signing it?</div> <div>22 MS. BREDEHOFT: Object to the form of</div>
<div>L</div> <div>114</div> <div>1 MS. BREDEHOFT: Same objections.</div> <div>2 A. Correct.</div> <div>3 Q. How many times did you meet with Ms.</div> <div>4 Heard's attorneys in relation to your statement?</div> <div>5 A. Once.</div> <div>6 Q. And who drafted the statement for you?</div> <div>7 A. The -- the lawyer firm. I don't know.</div> <div>8 Q. Did they interview you ahead of drafting</div> <div>9 the statement?</div> <div>10 A. Correct. I physically went to his</div> <div>11 office.</div> <div>12 MS. BREDEHOFT: Objection to the form of</div> <div>13 the question.</div> <div>14 MS. VASQUEZ: I'm sorry, Elaine.</div> <div>15 Q. I -- I missed that answer, Ms.</div> <div>16 Inglessis.</div> <div>17 A. I physically went to his office and we</div> <div>18 did -- we did a oral statement. We had to -- I</div> <div>19 don't know how you -- your legal term. We talked</div> <div>20 and then he -- he draft a statement and sent it to</div> <div>21 me and I reviewed it and signed it.</div> <div>22 Q. Did that all happen in one day, in that</div>	<div>116</div> <div>1 the question, it's leading.</div> <div>2 A. Yes.</div> <div>3 Q. What changes do you recall making, if</div> <div>4 any?</div> <div>5 A. I recall making changes about -- you</div> <div>6 know, what was very important for me in this saga</div> <div>7 is that I can only recall -- I can only say what I</div> <div>8 recall exactly. I just didn't want to have words</div> <div>9 put in my mouth or statement, put things, because</div> <div>10 my text said I was there and I did not recall it.</div> <div>11 Once again, I know it's irrelevant to</div> <div>12 this case, but I had really bad postpartum and my</div> <div>13 memory has really gone AWOL. And so what I didn't</div> <div>14 want to do is -- because those -- those texts put</div> <div>15 me there, even if I don't recall I'm going say I'm</div> <div>16 going to be there. I just really wanted to</div> <div>17 recall -- to be able to write the statement</div> <div>18 exactly what I recall and nothing else.</div> <div>19 And so when I went to see him and we</div> <div>20 start talking, you know, when he draft the</div> <div>21 statement, he put things in there that I didn't</div> <div>22 recall but he said. So I wanted him to make the</div> <div>UR</div>

<p>117</p> <p>1 statement really short and exactly what I recall 2 so I could -- when I get -- you know, when I get 3 subpoenaed or when I -- exactly like this, I could 4 really be -- remember what I remember and not the 5 rest. 6 Q. Okay. 7 A. So I asked him to change it a couple of 8 times to make it shorter and to make it -- not 9 because Amber said I was there and Rocky said I 10 was there, that I must -- must have been there. I 11 don't -- I didn't recall being there or -- at 12 certain events. So that is why I asked him to 13 change it, until I felt confident that when I get 14 interviewed by you guys I could only say what I 15 remember properly. 16 Q. Understood. 17 Thank you, Ms. Inglessis. 18 And did you feel, when you signed the 19 witness statement, that it accurately described 20 what you recalled from the incidents in question? 21 MS. BREDEHOFT: Objection, leading, 22 hearsay.</p>	<p>119</p> <p>1 A. Yeah. I mean, it does look like it, 2 yes. 3 Q. Do you have any reason to doubt that 4 this is the statement that was prepared by Ms. 5 Heard's attorneys and that you executed some time 6 in 2019? 7 A. No. 8 Q. Do you recall, Ms. Inglessis, signing 9 this by DocuSign? 10 A. Yes. I don't recall DocuSign, but I -- 11 I -- I did not go physically and give it to him 12 and I did not via mail so it must have been 13 DocuSign, yes. 14 MS. VASQUEZ: And, Alex, may I please 15 have you scroll up. 16 Q. Ms. Inglessis, I'm going to ask you 17 to -- to look at paragraph 3 on the first page. 18 MS. VASQUEZ: Thanks, Alex. 19 Q. I think you just previously testified MS, L 20 that there was a fact that was wrong in your 21 Declaration. 22 A. Uh-huh.</p>
<p>118</p> <p>1 Go ahead. 2 A. I do think that, yes. 3 Now I realize there was a -- there was a 4 error in the date, in the month I met Amber. 5 Because, I guess, we looked at Tribeca Film 6 Festival and it was -- I don't know if it -- I 7 guess, the date was wrong. Instead of April, it 8 was May. 9 But as far as my recollection of 10 December 16, yes, it was accurate. 11 MS. VASQUEZ: Alex, may I have you 12 please pull up Depp 2. 13 (Exhibit 30 was marked for 14 identification and is attached to the 15 transcript). 16 MS. VASQUEZ: Thank you, Alex. 17 Q. Ms. Inglessis, is -- I'm going to have 18 Alex maybe just slowly scroll down. 19 Ms. Inglessis, is this the Declaration 20 that you recall drafting with Ms. Heard's 21 attorneys maybe two years ago and that you 22 ultimately signed?</p>	<p>120</p> <p>1 Q. Turning your attention to paragraph 3, 2 do you see where you -- the Declaration states, "I 3 first met Amber Heard (Amber) in January of 2015 4 at the Tribeca Film Festival in New York. 5 Amber's normal makeup artist was unavailable and I 6 was called to fill in." 7 How is that statement inaccurate, Ms. 8 Inglessis? 9 A. I met Amber April of 2015, not January. 10 Q. And do you recall telling Ms. Heard's 11 attorneys that you met her in January or do you 12 recall telling them that you met her in April of 13 2015? 14 A. I don't recall. 15 I recall looking at pictures. I recall 16 trying to go get and find the exact month of the 17 Tribeca Film Festival in 2015. And I recall 18 that's how we put the date in. But then as -- 19 then as this dragged on, obviously, I couldn't 20 have met her in January of 2015 because that's 21 when she got married and I -- I wasn't there when 22 she got married. So then it was -- then I looked</p>

<p>121</p> <p>1 at a better picture and it was April 2015.</p> <p>2 So I'm not sure how this January came</p> <p>3 about. I don't know if we looked at some Getty</p> <p>4 Images with the wrong date on it or – I don't</p> <p>5 know. It's not the right date. It's April.</p> <p>6 Q. Do you recall when you realized there</p> <p>7 was a mistake in your Declaration?</p> <p>8 A. I realized it was a mistake in my</p> <p>9 Declaration, I think, when I started getting ready</p> <p>10 for the UK trial. Go – when I went – because,</p> <p>11 you know, I did the Declaration and I kind of – I</p> <p>12 did not – I mean, this has no impact in my life.</p> <p>13 It was focusing. And then when that – when I had</p> <p>14 to get – get ready for the UK trial, I guess, I</p> <p>15 had to read through this again and I was like, no,</p> <p>16 that doesn't sound right, it's January, not April.</p> <p>17 Q. Ms. Inglessis, at the time this</p> <p>18 Declaration was drafted and you executed it, were</p> <p>19 you and Ms. Heard still on friendly terms?</p> <p>20 Was she still your client?</p> <p>21 MS. BREDEHOFT: Objection, leading.</p> <p>22 Go ahead.</p>	<p>123</p> <p>1 MS. VASQUEZ: Thank you, Alex.</p> <p>2 Do you mind scrolling all the way to the</p> <p>3 top?</p> <p>4 Q. Ahead of your testimony in the United</p> <p>5 Kingdom, Ms. Inglessis, do you recall a witness</p> <p>6 summary being prepared for your review?</p> <p>7 A. Sure. I don't know – yeah. Is that</p> <p>8 what it – is that a witness summary?</p> <p>9 Q. Well, perhaps, my question was</p> <p>10 confusing.</p> <p>11 Do you recall reviewing this document</p> <p>12 ahead of your testimony in the United Kingdom?</p> <p>13 A. I am reviewing a lot of documents.</p> <p>14 Was that part of the file? Maybe. I</p> <p>15 don't know.</p> <p>16 Q. But you don't have an independent</p> <p>17 recollection of reviewing this witness summary</p> <p>18 ahead of your testimony in the United Kingdom;</p> <p>19 correct?</p> <p>20 A. Not – correct. Not particularly, no.</p> <p>21 Q. Okay. And do you recall --</p> <p>22 A. Yeah. I'm just not sure what name --</p>
<p>122</p> <p>1 A. Yes.</p> <p>2 MS. VASQUEZ: Alex, may I please have</p> <p>3 you pull up what's Depp 3, please.</p> <p>4 (Exhibit 31 was marked for</p> <p>5 identification and is attached to the</p> <p>6 transcript).</p> <p>7 MS. VASQUEZ: Thank you, Alex.</p> <p>8 Do you mind just slowly scrolling down</p> <p>9 just to give the -- give Ms. Inglessis an</p> <p>10 opportunity to just briefly review the</p> <p>11 document.</p> <p>12 Q. Ms. Inglessis, do you recognize this</p> <p>13 document?</p> <p>14 A. Uh-uh. No.</p> <p>15 Q. Okay. I'll let Alex continue scrolling</p> <p>16 down slowly and see if maybe it triggers a memory.</p> <p>17 Ms. Inglessis, is it fair to say this is</p> <p>18 the first time you've seen this document?</p> <p>19 A. No, it's not fair to say so.</p> <p>20 I have – I receive so many documents in</p> <p>21 so many different shape and form. I don't know</p> <p>22 what – what this particular document is.</p>	<p>124</p> <p>1 was this given to me with the – with the file?</p> <p>2 Maybe. I don't know.</p> <p>3 But did I review a witness statement</p> <p>4 before? Yes, of course, I did.</p> <p>5 Is it that particular document that</p> <p>6 you're showing me? I have no idea.</p> <p>7 But I reviewed my witness statement</p> <p>8 before court, yes.</p> <p>9 Q. And when you're referring to your</p> <p>10 "witness statement," is it the previous exhibit</p> <p>11 that I just showed you or is it this Witness</p> <p>12 Summary of Melanie Inglessis?</p> <p>13 A. I think probably both.</p> <p>14 MS. BREDEHOFT: Objection, form,</p> <p>15 foundation, hearsay.</p> <p>16 Q. I'm sorry, I missed your answer, Ms.</p> <p>17 Inglessis.</p> <p>18 A. Probably both.</p> <p>19 Q. Do you have an independent recollection,</p> <p>20 though, of reviewing this particular document</p> <p>21 ahead of your testimony in the United Kingdom?</p> <p>22 A. No.</p>

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<p>125</p> <p>1 Q. Okay. And I assume, if you don't have 2 an independent recollection of reviewing this 3 particular document, you also did not help prepare 4 this document ahead of your testimony in the 5 United Kingdom; correct? 6 MS. BREDEHOFT: Objection to the form of 7 the question, leading. 8 A. I don't know what you mean by "help". I 9 don't know what you mean by "help prepare". 10 Q. Did you help draft this document? 11 A. I don't know what you mean "help 12 prepare." 13 Q. Did you help draft this document? 14 A. Did I? Did I personally draft it? 15 Q. Yes. 16 A. No. No. 17 Q. And did you help an attorney draft this 18 particular document ahead of your -- ahead of your 19 testimony in the United Kingdom? 20 MS. BREDEHOFT: I'm going to object to 21 the extent that that would call for Ms. 22 Inglessis to reveal communications with her</p>	<p>127</p> <p>1 A. I don't recall. 2 Q. And that's what I mean, you don't have 3 an independent recollection of ever seeing this 4 document before today? 5 MS. BREDEHOFT: Object to the form of 6 the question, asked and answered, lacks 7 foundation, hearsay. 8 Go ahead. 9 A. I don't recall -- 10 Q. Okay. 11 A. -- that document from the other 12 document. Sorry. 13 Q. Okay. Perfect. That's fine. Thank 14 you. 15 MS. VASQUEZ: Thanks, Alex. 16 Q. Ms. Inglessis, the attorney that you 17 testified earlier assisted you ahead of your 18 testimony in the United Kingdom, was her name Anya 19 Goldstein? 20 A. Yes, it was. 21 Q. And I know I'm going to get an objection 22 from Ms. Bredehoft.</p>
<p>126</p> <p>1 counsel, as that would be attorney-client 2 privilege. 3 But it's up to you, Ms. Inglessis. 4 A. I -- I -- I'm just -- I'm trying to 5 understand what you want and I'm just getting 6 confused. 7 I -- I -- I -- I'm just not sure. Did I 8 draft this document myself? No. 9 Did I help draft? What does that mean, 10 help draft? 11 I just -- I'm trying to understand. I'm 12 trying to be professional and help you, but I'm 13 just confused on what exactly you want me -- like, 14 I don't understand. I'm sorry. 15 Q. It's okay. And I apologize if my 16 questions aren't clear. So I will be clear. 17 Before today, you don't have any 18 independent recollection of seeing this document; 19 correct? 20 MS. BREDEHOFT: Objection, leading, 21 foundation, hearsay. 22 Go ahead.</p>	<p>128</p> <p>1 But, Ms. Inglessis, did you pay any 2 money to Ms. Goldstein in connection with her 3 representation of you as it relates to your 4 testimony in the United Kingdom? 5 MS. BREDEHOFT: I am going to object as 6 that calls for attorney-client 7 communications. 8 But that's up to you, Ms. Inglessis, 9 whether you waive that privilege or not. 10 MS. VASQUEZ: I'm -- I'm going to 11 disagree, Elaine, that it calls for 12 communications. 13 Whether she actually paid money to an 14 attorney is relevant, so I'm -- it doesn't 15 call for attorney-client communications. I'm 16 not asking how much money. I'm not asking -- 17 I'm asking if she personally paid money to 18 this attorney or if Ms. Heard was the one 19 that compensated Ms. Goldstein. 20 MS. BREDEHOFT: Her -- her 21 communications with her counsel and her 22 arrangements with her counsel are part of her</p>

Transcript of Melanie Inglessis
Conducted on February 2, 2021

33 (129 to 132)

<p>1 attorney-client communications and, 2 therefore, are privileged. 3 Now -- 4 MS. VASQUEZ: Okay. And, again, it's 5 inappropriate for you to be making these 6 objections and instructing the witness not to 7 answer and coaching the witness not to answer 8 questions that I disagree with. 9 MS. BREDEHOFT: Okay. Can we -- can I 10 talk again or are you going to interrupt me 11 again? 12 MS. VASQUEZ: Elaine, this is my portion 13 of the deposition, but you feel the need to 14 talk a lot so go ahead. 15 MS. BREDEHOFT: Well, the record will 16 speak differently. 17 But, in any event, I'm permitted to 18 lodge an objection. I objected on the basis 19 of attorney-client communications. 20 But I did not coach, nor do I instruct 21 Ms. Inglessis, nor do I represent her. But 22 she is unrepresented here and that's why I</p>	<p>129</p>	<p>1 A. Correct. 2 Q. Okay. Thank you. Move on from that. 3 I know Ms. Bredehoft asked you earlier. 4 Do you recall the first time you met Mr. Depp? 5 A. The first time I -- I met Mr. Depp? 6 Q. Yes. 7 A. Yeah. I -- I think it was at the 8 penthouse. I came to see Amber. I'm not sure the 9 month. It must be somewhere in 2015, not long 10 after I met Amber. I just came to the penthouse 11 and he was there. 12 Q. And what was your impression of him, 13 when you first met him? 14 A. I don't know if you're talking about -- 15 I can't hear you. 16 Q. I think there's a bit of a delay 17 actually. 18 A. Frozen. 19 Q. Yeah. I'm having -- you keep freezing, 20 Ms. Inglessis, and there's a bit of a delay. 21 A. Yes. Same here. 22 MS. VASQUEZ: Is everyone experiencing</p>
<p>1 have indicated that those are objections, 2 they're valid objections, and it's up to Ms. 3 Inglessis, however she wants to handle it. 4 But I do not want her to be taken 5 advantage of when she's unrepresented. 6 MS. VASQUEZ: And I don't want her 7 coached, let alone by somebody that isn't her 8 attorney. 9 Q. Ms. Inglessis, do you need the question 10 read back or are you refusing to answer? 11 A. I'm refusing to answer. 12 Q. Okay. I believe it was your 13 testimony -- and I'm going to try to wrap this up. 14 I believe it was your testimony, though, 15 that it was your understanding Ms. Heard provided 16 an attorney for you in connection with your 17 testimony in the United Kingdom; correct? 18 MS. BREDEHOFT: Objection, leading and 19 foundation. 20 Q. Previously testified. 21 MS. BREDEHOFT: Objection, leading. 22 Go ahead.</p>	<p>130</p>	<p>1 this technical difficulty? 2 THE WITNESS: Now it seems to be back 3 on. 4 REMOTE TECHNICIAN: This is Alex, the 5 tech speaking. Yes, I -- Zoom is telling me 6 that Ms. Inglessis's internet connection 7 is -- is a little bit unstable unfortunately, 8 but... 9 MS. BREDEHOFT: Nobody wants to hear 10 their internet is unstable. 11 THE WITNESS: I can move to another, 12 maybe. Well, I don't want to move too much. 13 MS. VASQUEZ: You're frozen again, Ms. 14 Inglessis. At least to me. 15 MS. BREDEHOFT: Camille, how much do you 16 have left about, roughly? 17 MS. VASQUEZ: I don't know. I -- I -- 18 why don't we take a -- maybe a ten-minute 19 break. 20 MS. BREDEHOFT: That's what I was going 21 to say. 22 MS. VASQUEZ: And maybe the internet</p>

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<p>133</p> <p>1 will be back a little better.</p> <p>2 I'm sorry, Ms. Inglessis, you're</p> <p>3 absolutely frozen.</p> <p>4 THE VIDEOGRAPHER: Okay. So it is 2:33</p> <p>5 p.m. We go off the record.</p> <p>6 (A recess was taken).</p> <p>7 THE VIDEOGRAPHER: It is the beginning</p> <p>8 of video number three of the testimony of</p> <p>9 Melanie Inglessis. It is 2:46 p.m. We are</p> <p>10 back on the record. I'm sorry.</p> <p>11 BY MS. VASQUEZ:</p> <p>12 Q. Ms. Inglessis, I believe there was a</p> <p>13 question pending before the break.</p> <p>14 MS. VASQUEZ: And, April, do you mind</p> <p>15 reading back the question?</p> <p>16 THE COURT REPORTER: Of course not.</p> <p>17 Just a moment, please.</p> <p>18 (THEREUPON, the above-referred to</p> <p>19 portion of the Record was read back by</p> <p>20 the Court Reporter).</p> <p>21 Q. Ms. Inglessis, what was your impression</p> <p>22 of Ms. Depp when you first met?</p>	<p>135</p> <p>1 A. No.</p> <p>2 Q. Did you ever see Mr. Depp yell at Ms.</p> <p>3 Heard?</p> <p>4 MS. BREDEHOFT: Objection, leading.</p> <p>5 A. No.</p> <p>6 Q. Did you ever see him kick Ms. Heard?</p> <p>7 MS. BREDEHOFT: Objection, leading.</p> <p>8 A. No.</p> <p>9 Q. Did you ever see Mr. Depp throw an</p> <p>10 object at Ms. Heard?</p> <p>11 MS. BREDEHOFT: Objection, leading.</p> <p>12 A. No.</p> <p>13 Q. Did you ever see Mr. Depp slap Ms.</p> <p>14 Heard?</p> <p>15 MS. BREDEHOFT: Objection, leading.</p> <p>16 A. No.</p> <p>17 Q. Punch her?</p> <p>18 MS. BREDEHOFT: Objection, leading.</p> <p>19 A. No.</p> <p>20 Q. Did you ever see Mr. Depp kick Ms.</p> <p>21 Heard?</p> <p>22 MS. BREDEHOFT: Objection, leading.</p>
<p>134</p> <p>1 A. Lovely.</p> <p>2 Q. You thought he was lovely?</p> <p>3 A. Yeah.</p> <p>4 Q. Was each of -- well, let me ask a backup</p> <p>5 question.</p> <p>6 Did you interact with Mr. Depp -- how</p> <p>7 many times did you interact with Mr. Depp?</p> <p>8 A. Through -- you mean all in all?</p> <p>9 Q. Yes. The entirety of your interactions.</p> <p>10 How many were there, approximately?</p> <p>11 A. Five, maybe -- maybe -- maybe -- less</p> <p>12 than ten, maybe. I don't...</p> <p>13 Q. And would you describe all your</p> <p>14 interactions with Mr. Depp as, quote, "lovely"?</p> <p>15 A. Yes.</p> <p>16 MS. BREDEHOFT: Objection, leading.</p> <p>17 Go ahead.</p> <p>18 A. Yes.</p> <p>19 Q. Did you ever see Mr. Depp act in a</p> <p>20 violent manner?</p> <p>21 MS. BREDEHOFT: Objection, leading.</p> <p>22 Go ahead.</p>	<p>136</p> <p>1 A. No.</p> <p>2 Q. Is it fair to say, Ms. Inglessis, that</p> <p>3 you never saw Mr. Depp be physically abusive</p> <p>4 towards Ms. Heard?</p> <p>5 MS. BREDEHOFT: Objection, leading.</p> <p>6 A. Correct.</p> <p>7 Q. And you never saw Mr. Depp cause any</p> <p>8 injuries to Ms. Heard; correct?</p> <p>9 MS. BREDEHOFT: Objection, leading,</p> <p>10 hearsay, foundation.</p> <p>11 A. Did I ever saw him causing any injuries?</p> <p>12 No.</p> <p>13 Q. And so any injuries that you claim to</p> <p>14 have seen on Ms. Heard, you don't know, one way or</p> <p>15 the other, how they were caused; correct?</p> <p>16 MS. BREDEHOFT: Objection, leading,</p> <p>17 foundation and hearsay.</p> <p>18 Go ahead.</p> <p>19 A. Correct.</p> <p>20 Q. The only source of information is from</p> <p>21 Ms. Heard; correct?</p> <p>22 MS. BREDEHOFT: Objection, leading.</p>

<p>137</p> <p>1 Go ahead.</p> <p>2 A. Correct.</p> <p>3 Q. Okay. Do you remember the first time</p> <p>4 Ms. Heard told you that Mr. Depp was physically</p> <p>5 abusive towards her?</p> <p>6 A. I don't recall the exact time or day or</p> <p>7 the exact time, no.</p> <p>8 Q. Do you recall the incident that Ms.</p> <p>9 Heard described for you when she first told you</p> <p>10 that Mr. Depp was abusing her?</p> <p>11 A. I mean, the two incidents that I recall,</p> <p>12 where Amber told me that Mr. Depp was abusive to</p> <p>13 her, was the -- I don't know in what -- which</p> <p>14 order, but I am assuming December, the James</p> <p>15 Corden, and then May 2016, the -- the -- the other</p> <p>16 incident. So one is the end of December and then</p> <p>17 one in -- in -- in May, 2016, I believe. Yes.</p> <p>18 Q. So do you recall having numerous</p> <p>19 conversations with Ms. Heard about Mr. Depp</p> <p>20 abusing her?</p> <p>21 A. Yes.</p> <p>22 Q. Which -- besides the two incidents, the</p>	<p>139</p> <p>1 them. IC</p> <p>2 Q. I'm going to ask you a little bit more</p> <p>3 about that specific incident.</p> <p>4 Do you recall -- well, did Ms. Heard</p> <p>5 have Mr. Depp on speaker phone in front of you</p> <p>6 during that fight that they were having?</p> <p>7 MS. BREDEHOFT: Objection, leading.</p> <p>8 A. No. No.</p> <p>9 MS. BREDEHOFT: Go ahead.</p> <p>10 A. No.</p> <p>11 Q. Did you hear Mr. Depp and Ms. Heard</p> <p>12 having a fight on the phone?</p> <p>13 MS. BREDEHOFT: Objection, leading.</p> <p>14 A. I was there.</p> <p>15 MS. BREDEHOFT: I'm sorry. H; F/A; SP;</p> <p>16 Go ahead. lack of pers.</p> <p>17 A. I was there. I was present in the room. know.</p> <p>18 Q. And -- but just to confirm, could you</p> <p>19 hear Mr. Depp's voice?</p> <p>20 A. No.</p> <p>21 Q. Okay. So fair to say that the only L</p> <p>22 voice you heard was with Ms. -- was Ms. Heard's;</p>
<p>138</p> <p>1 December 2015 and the May 2016 incidents, any</p> <p>2 other incidents that you remember Ms. Heard</p> <p>3 describing for you?</p> <p>4 A. Well, not always physical. Some mental</p> <p>5 abuse early on.</p> <p>6 I remember -- I think the first incident</p> <p>7 that is in my mind is -- so I met Amber in April.</p> <p>8 I do believe we did a press tour for Magic Mike</p> <p>9 that summer. The date, I'm not exactly sure. And</p> <p>10 we were in Amsterdam, I do believe, or London.</p> <p>11 And I was getting her ready for the premier. And</p> <p>12 she and Mr. Depp were having a huge fight over the</p> <p>13 phone.</p> <p>14 I remember clearly because she was</p> <p>15 already made up to walk the red carpet and she end</p> <p>16 up crying and was in such a -- she was in a really</p> <p>17 bad state because -- and I had to redo the makeup</p> <p>18 and touch her up to walk.</p> <p>19 So that was my first clear memory of</p> <p>20 some kind of -- I don't know if -- you know, I</p> <p>21 don't know if you guys -- how you -- some kind of</p> <p>22 fight between them quite -- a bad fight between</p>	<p>140</p> <p>1 correct?</p> <p>2 MS. BREDEHOFT: Objection, leading.</p> <p>3 A. Correct.</p> <p>4 Q. Okay. And so you don't know what she -- L</p> <p>5 what Mr. Depp said to Ms. Heard on that phone</p> <p>6 call; correct?</p> <p>7 MS. BREDEHOFT: Objection, leading.</p> <p>8 Go ahead.</p> <p>9 A. Correct.</p> <p>10 Q. I believe you described it as -- and H; F/A; SP;</p> <p>11 maybe I'm misstating your testimony, as mental lack of</p> <p>12 abuse. Is that a fair description of what you pers. know.</p> <p>13 thought Mr. Depp was doing to Ms. Heard on that opinion</p> <p>14 phone call?</p> <p>15 A. Correct.</p> <p>16 Q. And why do you say that?</p> <p>17 A. Because she was extremely distressed</p> <p>18 that day, that time and then we talked a little</p> <p>19 further after the phone call of what had</p> <p>20 transpired and why -- why they were fighting.</p> <p>21 Q. And what did Ms. Heard tell you as to</p> <p>22 the reasons they were fighting and what had IC</p>

<div>141</div> <div>1 transpired?</div> <div>2 A. That time specifically, if I recall</div> <div>3 correctly, was about her taking roles with other</div> <div>4 lead – lead men and how jealous he was and –</div> <div>5 yes. In that realm, about jealousy.</div> <div>6 Q. But again, you didn't hear what Mr. Depp</div> <div>7 said or didn't say to Ms. Heard on that phone</div> <div>8 call; correct?</div> <div>9 A. Correct.</div> <div>10 Q. So any impression you have of that phone</div> <div>11 call between Mr. Depp and Ms. Heard is from what</div> <div>12 Ms. Heard told you; right?</div> <div>13 MS. BREDEHOFT: Objection, leading.</div> <div>14 Go ahead.</div> <div>15 A. Correct.</div> <div>16 Q. Do you recall any other occasions where</div> <div>17 you witnessed a fight between Mr. Depp and Ms.</div> <div>18 Heard or heard about an incident or a fight</div> <div>19 between Mr. Depp and Ms. Heard? Other than the</div> <div>20 three that we've now discussed.</div> <div>21 A. I would say every time. I would say</div> <div>22 that during my friendship with Amber, before she</div>	<div>143</div> <div>1 MS. BREDEHOFT: Objection, leading.</div> <div>2 Go ahead.</div> <div>3 A. What do you mean "that all came"?</div> <div>4 Q. You never witnessed anything yourself</div> <div>5 personally?</div> <div>6 A. Correct.</div> <div>7 MS. BREDEHOFT: Leading.</div> <div>8 Q. So any descriptions of any fights or</div> <div>9 physical or emotional or disagreements were all</div> <div>10 described by Ms. Heard?</div> <div>11 MS. BREDEHOFT: Objection, leading.</div> <div>12 Go ahead.</div> <div>13 A. Correct.</div> <div>14 Q. I think you testified that you</div> <div>15 interacted with Mr. Depp less than ten times.</div> <div>16 When you did interact with Mr. Depp, was</div> <div>17 Ms. Heard present each of those times?</div> <div>18 A. All of those times.</div> <div>19 Q. Okay. How did you observe the way Mr.</div> <div>20 Depp would treat Ms. Heard in your presence?</div> <div>21 A. Fine.</div> <div>22 I mean, different incident, different</div>
<div>142</div> <div>1 files for divorce, which – I mean, timeline, I</div> <div>2 don't know a year, maybe a year and a half. It</div> <div>3 was all – it was always – it was always some</div> <div>4 conflict, some fight, some – some physical</div> <div>5 fights, some verbal fights, some kind of problem,</div> <div>6 some kind of – there's always. It always was a</div> <div>7 problem – problematic – it was a very consuming</div> <div>8 for me – it was all consuming about that</div> <div>9 relationship. It was a very consuming friendship.</div> <div>10 In the end, that's why I decided not to continue</div> <div>11 it.</div> <div>12 Q. But you, yourself, Ms. Inglessis, didn't</div> <div>13 witness any of these altercations, fights,</div> <div>14 arguments; correct --</div> <div>15 A. Correct.</div> <div>16 Q. -- between Ms. Depp and Ms. Heard?</div> <div>17 MS. BREDEHOFT: Objection, leading.</div> <div>18 A. Correct.</div> <div>19 Q. So fair to say that this all-consuming</div> <div>20 description of their arguments, theirs meaning Ms.</div> <div>21 Depp's, Ms. Heard's arguments or disagreements,</div> <div>22 fights, that all came from Ms. Heard; correct?</div>	<div>144</div> <div>1 time, but always fine. I – yeah. Yeah, fine.</div> <div>2 Q. Did you think that he was sweet towards</div> <div>3 Ms. Heard?</div> <div>4 MS. BREDEHOFT: Objection, leading and</div> <div>5 calls for speculation, hearsay.</div> <div>6 A. Not particularly, no.</div> <div>7 Q. Did you find him particularly loving</div> <div>8 towards Ms. Heard?</div> <div>9 A. Not particularly, no.</div> <div>10 Q. How would you describe his general</div> <div>11 demeanor, then, around Ms. Heard?</div> <div>12 A. It depends.</div> <div>13 You know, a couple of incident we – he</div> <div>14 was working, performing at the Grammy's so,</div> <div>15 therefore, the interaction was minimal. Other</div> <div>16 times we were in Venice both getting ready.</div> <div>17 I've never really encountered them being</div> <div>18 very intimate. Maybe once or twice at a dinner.</div> <div>19 We spent Thanksgiving together and Amber's</div> <div>20 birthday dinner together. But – yeah.</div> <div>21 I mean, fine. Like nothing – nothing</div> <div>22 came out of – nothing comes out in my mind.</div>

<p>145</p> <p>1 Q. Okay. And during these interactions</p> <p>2 with Mr. Depp and Ms. Heard, at that time you were</p> <p>3 aware that Mr. Depp allegedly was abusing Ms.</p> <p>4 Heard; correct?</p> <p>5 A. Well, most of -- most of the interaction</p> <p>6 that I had was towards the end of 2015, right, I'm</p> <p>7 assuming, so I was not fully aware yet of, I</p> <p>8 guess, the -- the seriousness of -- of -- of -- of</p> <p>9 their fight, if I can say so.</p> <p>10 I think -- you know, most of the time I</p> <p>11 saw them together was towards the end of December</p> <p>12 5th -- towards -- before December 15th, so</p> <p>13 Thanksgiving, that time. And Amber's, I think,</p> <p>14 birthday. I'm getting confused with it. So the</p> <p>15 few times that I saw Mr. Depp was before I</p> <p>16 understood the seriousness of -- of their fight.</p> <p>17 Q. And your understanding, again, came from</p> <p>18 Ms. Heard only; correct?</p> <p>19 MS. BREDEHOFT: Objection, leading.</p> <p>20 A. Well, Ms. Heard and some of her friends,</p> <p>21 yes.</p> <p>22 Q. Who were some of her friends?</p>	<p>147</p> <p>1 having any type of disagreement or fight that</p> <p>2 evening?</p> <p>3 A. Disagreement, maybe, like a -- like -- H; F/A; SP;</p> <p>4 yeah, like a disagreement. lack of</p> <p>5 Fight I think came later when we were pers. know.</p> <p>6 already gone.</p> <p>7 Q. What do you mean by that?</p> <p>8 A. Well, I mean, there was -- you know, it</p> <p>9 was such a small, intimate surrounding that you</p> <p>10 pick up on things. And so like I could tell that</p> <p>11 it was -- it was awkward. It was just awkward.</p> <p>12 I think Mr. Depp and Mr. Manson</p> <p>13 disappeared for awhile. Then everybody was at the</p> <p>14 table so they was wondering where they were. Just</p> <p>15 awkward. But that -- that just the opposite, I</p> <p>16 was just happy to be having Thanksgiving.</p> <p>17 Q. I believe you testified previously that</p> <p>18 the fight came later. What fight are you</p> <p>19 referring to?</p> <p>20 A. I'm assuming a fight that Amber told me</p> <p>21 happened later.</p> <p>22 Q. Do you recall -- I'm sorry.</p>
<p>146</p> <p>1 A. Rocky, Raquel Pennington, iO Tillett.</p> <p>2 I'm -- I'm not sure how you pronounce it. Josh</p> <p>3 Drew. The people that were living -- her sister,</p> <p>4 Whitney. Those were the core group.</p> <p>5 Q. You said you spent Thanksgiving with Mr.</p> <p>6 Depp and Ms. Heard. Was that in Thanksgiving</p> <p>7 November 2015?</p> <p>8 A. Yes. Correct. Because they were</p> <p>9 divorced by May of 2016, so yes.</p> <p>10 Q. How would you describe that evening?</p> <p>11 A. Awkward.</p> <p>12 Q. Why?</p> <p>13 A. Because Marilyn Manson was there.</p> <p>14 Q. Did you know Marilyn Manson?</p> <p>15 A. No.</p> <p>16 But it just was an awkward Thanksgiving</p> <p>17 sitting there. It was quite intimate. So</p> <p>18 sitting -- yeah, it was just awkward. He's an</p> <p>19 awkward -- he's just an awkward being and he's</p> <p>20 just awkward to be around. So it was -- it was an</p> <p>21 awkward evening.</p> <p>22 Q. Do you recall Mr. Depp and Ms. Heard</p>	<p>148</p> <p>1 A. I don't recall. H; F/A; SP;</p> <p>2 One of the many fights that happened. lack of pers.</p> <p>3 I don't recall exactly what happened know;</p> <p>4 that evening, but I'm pretty sure they had a cumul</p> <p>5 fight.</p> <p>6 Q. And you're pretty sure they had a fight</p> <p>7 because Ms. Heard told you after the fact that</p> <p>8 they had a fight; correct? L</p> <p>9 A. Correct.</p> <p>10 MS. BREDEHOFT: Objection, leading.</p> <p>11 A. Correct.</p> <p>12 Q. Because you were -- you did not witness</p> <p>13 Mr. Depp or Ms. Heard having any type of fight the</p> <p>14 evening of Thanksgiving; correct? L</p> <p>15 MS. BREDEHOFT: Objection, leading.</p> <p>16 Go ahead.</p> <p>17 A. Correct.</p> <p>18 Q. Do you recall Mr. Depp's son, Jack Depp,</p> <p>19 being present at Thanksgiving?</p> <p>20 A. Yes.</p> <p>21 Q. Okay. Was his daughter, Lily-Rose,</p> <p>22 there as well?</p>

<p>149</p> <p>1 A. Hmm. I don't recall.</p> <p>2 Q. Okay.</p> <p>3 A. But I re- -- I recall Jack specifically.</p> <p>4 Q. Do you recall Ms. Heard drinking on</p> <p>5 Thanksgiving?</p> <p>6 MS. BREDEHOFT: Objection, leading and</p> <p>7 hearsay, relevant, foundation.</p> <p>8 A. Sure. Yes.</p> <p>9 Q. Do you recall her drinking excessively?</p> <p>10 MS. BREDEHOFT: Objection, leading.</p> <p>11 Go ahead.</p> <p>12 A. No.</p> <p>13 Q. Do you recall Mr. Depp drinking</p> <p>14 excessively?</p> <p>15 A. No.</p> <p>16 Q. Other than the December 15th incident in</p> <p>17 2015, Ms. Inglessis, did you ever -- did Ms. Heard</p> <p>18 ever ask you to cover up any injuries she claimed</p> <p>19 were a result of Mr. Depp's abuse?</p> <p>20 MS. BREDEHOFT: Objection, leading.</p> <p>21 Go ahead.</p> <p>22 A. I don't recall, no.</p>	<p>151</p> <p>1 BY MS. VASQUEZ:</p> <p>2 Q. So, Ms. Inglessis, turn your attention</p> <p>3 to December 15th, 2015. I believe you testified</p> <p>4 that -- well, actually, I -- I don't remember your</p> <p>5 testimony exactly so let's clean it up.</p> <p>6 Is this a -- a fair and accurate -- does</p> <p>7 this document fairly and accurately depict your</p> <p>8 testimony from the United Kingdom?</p> <p>9 MS. BREDEHOFT: Objection, improper use</p> <p>10 of a deposition or prior testimony and also</p> <p>11 hearsay and leading.</p> <p>12 A. Okay. So do I need to answer?</p> <p>13 You asking me if I think that this is</p> <p>14 accurate to what I remember?</p> <p>15 Q. To what you remember testifying about in</p> <p>16 the United Kingdom.</p> <p>17 MS. BREDEHOFT: Same objection.</p> <p>18 Q. I will represent to you, Ms. Inglessis,</p> <p>19 this is a transcript that was prepared of your</p> <p>20 testimony and the questions that you were asked in</p> <p>21 the United Kingdom.</p> <p>22 A. Yeah.</p>
<p>150</p> <p>1 Q. You'd agree with me, though, Ms.</p> <p>2 Inglessis, that being asked by a client to cover</p> <p>3 up bruises, cuts would stick out in your mind,</p> <p>4 though; right?</p> <p>5 MS. BREDEHOFT: Objection, leading.</p> <p>6 Go ahead.</p> <p>7 A. No, not -- depends.</p> <p>8 No, not really, no. I don't -- I</p> <p>9 don't -- I don't think that's a fair statement,</p> <p>10 no.</p> <p>11 Q. Bruises and cuts as a result of domestic</p> <p>12 abuse, that wouldn't stick out in your mind?</p> <p>13 MS. BREDEHOFT: Objection.</p> <p>14 A. Well, you're leading me the wrong way.</p> <p>15 There's different kind of cuts and</p> <p>16 there's different kind of injuries, you know.</p> <p>17 Yeah, there's different injuries and -- so yeah.</p> <p>18 MS. VASQUEZ: Alex, may I have please</p> <p>19 have you bring up Depp Exhibit 4, please.</p> <p>20 And, Alex, can I have you scroll down to</p> <p>21 the pages that reflect 1980. Page 1980 and</p> <p>22 1981. Perfect. Thank you.</p>	<p>152</p> <p>1 Q. So if you --</p> <p>2 MS. BREDEHOFT: Excuse me. Same</p> <p>3 objection, improper use of a deposition or</p> <p>4 prior testimony, hearsay and foundation as</p> <p>5 well as leading.</p> <p>6 Go ahead.</p> <p>7 MS. VASQUEZ: Thank you.</p> <p>8 Alex, if you could scroll down to line</p> <p>9 21.</p> <p>10 Q. Ms. Inglessis --</p> <p>11 A. Uh-huh. Yeah.</p> <p>12 Q. -- I'm going to ask you to read from</p> <p>13 line 21.</p> <p>14 A. Okay.</p> <p>15 Q. So on December 2015, it is the day the</p> <p>16 James -- the day before James Corden, which was</p> <p>17 December 16th, I am having a little trouble</p> <p>18 exactly remember the day, the December 15th event.</p> <p>19 I am going to tell you what I remember. I was</p> <p>20 supposed to go bowling with my husband. I was</p> <p>21 supposed go bowling with Amber by my house I do</p> <p>22 believe around 8:30 or 9. And she never showed</p>

<p>153</p> <p>1 up. So that was that. I went back home. She did 2 send a text around 10, 10:30. I am sure you will 3 have in your files. She asked me -- I asked if 4 she was okay. She said no, not really, Johnny 5 came to talk, you know, and we had a fight and he 6 beat on me and so on and so on and so forth. I 7 said to her, do you need for me to come? She said 8 yes. So I came to the penthouse on December 15th. 9 Do you want me to read the whole thing? 10 Q. No. That's fine. 11 Ms. Inglessis, do you have an 12 independent recollection of going to the penthouse 13 in downtown Los Angeles on December 15th, 2015? 14 MS. BREDEHOFT: Objection, leading. 15 Go ahead. 16 A. I have an independent -- I have an 17 independent recollection of going to the penthouse 18 before one of the incident. And at the time I 19 wasn't -- I couldn't recall if it was the day 20 before the James Corden or the day before the fun 21 incident, so. What hap- -- and that is when I 22 made sure I needed to remember that it was the day</p>	<p>155</p> <p>1 on Amber Heard that evening; correct? L, H, F 2 MS. BREDEHOFT: Objection. 3 A. I don't recall seeing any injuries. 4 Q. Okay. 5 MS. BREDEHOFT: Objection, leading, and 6 hearsay, and foundation. 7 Go ahead. Go ahead. Now you can 8 answer. 9 THE WITNESS: I'm sorry. 10 A. I don't recall seeing any injuries on 11 Amber that day, that night. 12 Q. Okay. Do you recall if Ms. Pennington 13 was at the penthouse that evening? 14 A. Yes. 15 Q. Do you recall if anybody else was at the 16 penthouse that evening? 17 A. I don't recall. 18 Q. But you do remember Ms. Heard being 19 there and Ms. Pennington; correct? 20 A. Correct. 21 Q. All right. Did you take any photographs 22 of Ms. Heard the evening of December 15th, 2016?</p>
<p>154</p> <p>1 before December 16th where -- yes. 2 Does that make sense? 3 So I knew I had come a day before -- 4 a -- a day before one of the two biggest fight 5 that -- you know. And I wasn't sure if it was 6 that day or that day. But it was December 15th. 7 Q. And sitting here today, you're still not 8 sure if you went to the penthouse on December 9 15th, 2015, or if it was the day before the May 10 incident in 2016? 11 MS. BREDEHOFT: Objection, leading. 12 Go ahead. 13 A. Well, now that I'm sure because I got -- 14 I found my text. You have my text. Right? So it 15 is -- 16 Q. Well -- sorry. Go ahead. 17 A. I mean -- I mean, I know, I get it, but, 18 yes, I went to -- I went to the penthouse on 19 December 15th. 20 Q. Okay. And when you went to the 21 penthouse on December 15th, I believe you 22 testified before that you didn't see any injuries</p>	<p>156</p> <p>1 A. No. 2 Q. Do you recall being present when any 3 photographs of Ms. Heard were taken on December 4 15th, 2015? 5 A. I don't recall. 6 Q. Do you remember being present when 7 photographs of Ms. Heard's injuries were taken on 8 December 16th, 2006 -- 2015? 9 A. No. 10 Q. And did you take any pictures of Ms. 11 Heard and her injuries on December 16th, 2015? 12 A. No. 13 Q. So I don't want to take up the time of 14 showing you all the photographs Ms. Heard -- or, 15 excuse me, Ms. Bredehoft showed you earlier today, 16 but there were a number of exhibits. I think I 17 marked them as Exhibits 14 through 20 -- 18 A. Right. 19 Q. -- that you were shown earlier this 20 morning. L 21 Just to confirm, you didn't take any of 22 those photographs; correct?</p>

<p>157</p> <p>1 MS. BREDEHOFT: Objection, leading.</p> <p>2 Go ahead.</p> <p>3 A. Not on my phone. Not with my phone.</p> <p>4 And I do not recall taking Amber's or Rocky's</p> <p>5 phone to take those pictures, no. Definitely not</p> <p>6 with my phone.</p> <p>7 I do not recall taking physically myself</p> <p>8 this picture, no. I don't recall. No.</p> <p>9 Q. Do you recall photographs -- those</p> <p>10 photographs being taken of Ms. Heard in your</p> <p>11 presence?</p> <p>12 A. I don't recall.</p> <p>13 MS. BREDEHOFT: Objection, leading.</p> <p>14 Q. So just to be absolutely clear, on</p> <p>15 December 15th and December 16th, you don't recall</p> <p>16 any photographs being taken in your presence --</p> <p>17 MS. BREDEHOFT: Objection.</p> <p>18 Q. -- of Ms. Heard?</p> <p>19 MS. BREDEHOFT: Objection, leading.</p> <p>20 A. Correct.</p> <p>21 Q. Okay. On the night of December 15th,</p> <p>22 2015, do you recall Ms. Heard showing you the hair</p>	<p>159</p> <p>1 felt he tried to kill her that night; and she</p> <p>2 said he dragged her by her hair. And that is</p> <p>3 what I remember on that night."</p> <p>4 Do you remember testifying --</p> <p>5 A. Yes.</p> <p>6 Q. -- in the United Kingdom?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. Did you suggest to Ms. Heard that</p> <p>9 she be seen by a doctor as a result of this</p> <p>10 altercation with Mr. Depp?</p> <p>11 MS. BREDEHOFT: Objection, leading.</p> <p>12 A. I don't recall.</p> <p>13 Q. I'm sorry, I -- Ms. Bredehoft --</p> <p>14 A. I don't recall.</p> <p>15 Q. Do you recall Ms. Pennington suggesting</p> <p>16 that Ms. Heard be seen by a doctor or a nurse?</p> <p>17 MS. BREDEHOFT: Objection, leading.</p> <p>18 A. I don't. LINES 18-22: L</p> <p>19 Q. Do you recall anybody calling one of Ms.</p> <p>20 Heard's nurses or doctors to do a concussion check</p> <p>21 on Ms. Heard the evening of December 15th, 2006 --</p> <p>22 2015?</p>
<p>158</p> <p>1 that was allegedly missing from her head?</p> <p>2 MS. BREDEHOFT: Objection to the form of</p> <p>3 the question, including leading.</p> <p>4 A. I don't recall.</p> <p>5 Q. I think your previous testimony -- we</p> <p>6 should just go back to it.</p> <p>7 MS. VASQUEZ: I'm sorry, Alex. Exhibit</p> <p>8 4 again, Depp Exhibit 4.</p> <p>9 Q. On page 1982, line 16 through 18. Ms.</p> <p>10 Inglessis, do you remember testifying in the</p> <p>11 United Kingdom in response to the question:</p> <p>12 "QUESTION: What did she say to you had</p> <p>13 happened that night?"</p> <p>14 And your testimony was:</p> <p>15 "ANSWER: She said that Johnny and her</p> <p>16 had a fight. And the main thing that sticks</p> <p>17 in my mind that I remember is about an</p> <p>18 incident in the bed. She said he tried to</p> <p>19 suffocate her.</p> <p>20 "QUESTION: Tried to suffocate her?</p> <p>21 "ANSWER: Those were her words, yes. He</p> <p>22 tried to suffocate her with a pillow. She</p>	<p>160</p> <p>1 MS. BREDEHOFT: Objection, leading.</p> <p>2 A. I don't.</p> <p>3 Q. But fair to say, you didn't call one of</p> <p>4 Ms. Heard's doctors or nurses to do a concussion</p> <p>5 check on Ms. Heard on December 15th, 2015;</p> <p>6 correct?</p> <p>7 MS. BREDEHOFT: Objection, leading.</p> <p>8 A. Correct.</p> <p>9 Q. Do you recall how long you stayed at the</p> <p>10 penthouse on December 15th, 2015?</p> <p>11 MS. BREDEHOFT: Objection, asked and</p> <p>12 answered.</p> <p>13 Go ahead.</p> <p>14 A. No.</p> <p>15 Q. Do you recall spending the night at the</p> <p>16 penthouse?</p> <p>17 A. I would not have -- I would not have</p> <p>18 spent the night there, no.</p> <p>19 Q. And just to -- now, going to December</p> <p>20 16th, 2015, I believe your testimony was that</p> <p>21 you -- you arrived to the penthouse on December</p> <p>22 16th, 2015, after Ms. McMillan was already there;</p>

<p>1 correct? 2 A. Correct. 3 Q. Okay. Do you recall if Ms. Heard had 4 any makeup on before you arrived to the penthouse 5 on December 16th, 2015? 6 A. I don't recall. 7 Q. Would it be normal for Ms. Heard to have 8 makeup on her face before you arrived to do her 9 makeup ahead of an appearance? 10 MS. BREDEHOFT: Objection, leading, 11 foundation. 12 Go ahead. 13 A. It would be normal for Amber to have 14 concealer on, a little -- a little of that tint 15 there, yes, because it is quite normal for Amber 16 to wash her face. 17 She always liked to wash her face before 18 the makeup with the product that she likes, do a 19 toner, you know. So it wasn't be abnormal for her 20 to have a little makeup before and then wash her 21 face and start clean. 22 Q. But you don't remember, one way or</p>	<p>161 1 MS. BREDEHOFT: Objection, leading. 2 Go ahead. 3 A. I don't recall if she had some concealer 4 or she had a fresh face when I arrived at the 5 penthouse, correct. But I recall that she washed 6 her face. That she did every time we did her 7 makeup. 8 Q. Right. 9 MS. VASQUEZ: Okay. I am going to, 10 Alex, have you please pull up Depp 6. 11 Q. Ms. Inglessis, I'm going to play for you 12 part of the clip of Ms. Heard's appearance on the 13 James Corden show. 14 A. Uh-huh. 15 REMOTE TECHNICIAN: Are you ready, Ms. 16 Vasquez? 17 MS. VASQUEZ: Thank you, Alex. 18 Q. Ms. Inglessis, I'm just going to ask 19 that you watch this clip in its entirety and pay 20 particular attention to Ms. Heard's face. 21 A. Yeah. Okay. 22 Q. As pretty as James Corden is.</p>
<p>L 1 another, whether Ms. Heard had a fresh face with 2 toner and moisturizer on before -- when you 3 arrived on December 16th, 2015; correct? 4 MS. BREDEHOFT: Objection, leading. 5 A. No, I do not -- I don't recall. 6 Q. Would she usually wash her face and go 7 through that process in front of you? 8 MS. BREDEHOFT: Objection, leading. 9 A. Yes. I mean, in front of me in her 10 bathroom. But, you know, we -- we were close so 11 it wouldn't be abnormally for me to be 12 chit-chatting with her while she clean her face 13 and -- you know, I don't think specifically in 14 front of me or not in front of me, but... 15 Yeah. I mean, she would wash her face 16 in the bathroom which is adjacent to where we get 17 her ready. 18 Q. You don't remember, one way or another, 19 on December 16th, 2015, whether Ms. Heard had a 20 fresh face, no makeup on or whether she had maybe 21 some light concealer when you arrived to the 22 penthouse; right?</p>	<p>162 1 A. Yeah. 2 (Audio/Video recording played.) 3 MS. VASQUEZ: Thank you, Alex. 4 Q. Ms. Inglessis, is this a true and 5 accurate clip of Ms. Heard on the Late, Late Show 6 with James Corden on December 16th, 2015? 7 MS. BREDEHOFT: Objection, foundation. 8 A. What do you mean you're asking me is 9 this a true -- 10 Q. Is this -- is this the clip -- is -- 11 does this clip accurately depict Ms. Heard's 12 appearance on the James Corden show on December 13 16th, 2015? 14 MS. BREDEHOFT: Objection, foundation, 15 hearsay. 16 Go ahead. 17 A. Yes. 18 Q. And you applied Ms. Heard's makeup prior 19 to this appearance and for this appearance on 20 December 16th, 2015; correct? 21 A. Yes. 22 Q. Okay. And I know we've gone through --</p>

R; F/A;
SP; lack
of pers.
know.

H; F/A;
SP; lack
of pers.
know.

H; F/A;
SP; lack
of pers.
know.;
opinion

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1 well, you've gone through this with Ms. Bredehoft
2 but I'm -- unfortunately, for you, I'm also
3 entitled to ask questions about this, so.
4 And I want to be really specific. So
5 based on your best recollection, what injuries did
6 you see on Ms. Heard on December 16, 2015?
7 A. Amber had a slight discolor --
8 discoloration on both eyes and on the top of the
9 bridge of the nose. And -- hold on. And I do
10 believe the right eye had a little more of a gash
11 right there. It was -- it wasn't that strong. It
12 wasn't that swollen, but there was definitely some
13 blue and yellowish discoloration there, mainly on
14 the inner corner, and a little more here. And
15 then she had on the right -- on the right lip, as
16 I said earlier, I don't know the exact medical
17 term, but it looked like a split lip or like a
18 gash here.
19 Q. Was the lip -- let's start with the lip.
20 Was the lip bleeding?
21 A. The day of the James Corden show?
22 Q. Yes.

F/A; SP;
lack of
pers.
know.;
opinion

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1 A. I don't recall, no.
2 No, it wasn't bleeding.
3 Q. Did you ever see Ms. Heard's lip bleed
4 on December 15th or December 16th? L
5 MS. BREDEHOFT: Objection, leading.
6 A. I don't recall.
7 Q. But you have a -- you -- you remember L
8 that it was not bleeding on December 16th when you
9 were applying the makeup; correct?
10 MS. BREDEHOFT: Objection, leading.
11 A. When I was applying the makeup, correct.
12 Q. How about before you were applying the
13 makeup, do you recall it bleeding? L
14 MS. BREDEHOFT: Objection.
15 A. I don't recall.
16 THE WITNESS: Sorry.
17 MS. BREDEHOFT: That's okay.
18 A. I don't recall.
19 Q. And I think you described it as either a
20 gash or a split lip.
21 A. Yeah. I don't know what would be the
22 medical term for it. I don't know --

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Vague &
ambig.; F/A
SP; lack of
pers. know.
opinion

1 Q. Yeah, I'm not asking -- yeah, go ahead.
2 A. I'm not aware of what kind of injury
3 would have caused this. I am not a medical
4 expert, no forensic expert. It is slightly
5 swollen.
6 And, by the way, you can see it in the
7 video so it's crazy to me. But anyway, it was
8 slightly swollen and it was either a gash or -- it
9 was swollen with some kind of cut.
10 Q. Do you recall Ms. Heard ever having a
11 cold sore on her lips?
12 A. No.
13 Q. You said there was slight discoloration
14 under both eyes. Was there swelling under both
15 eyes as well?
16 A. Well, clarify "swelling".
17 Maybe very little, but it was mainly
18 discoloration, like bruise. I recall mainly
19 discoloration, like -- like a bruise. Maybe there
20 was a little tiny swelling on one of the eye that
21 was a little more -- a little more injured than
22 the other, but not huge swelling, no.

168
H; F/A;
SP; lack
of pers.
know.

1 Q. Did Ms. Heard tell you how she sustained
2 some slight swelling and discoloration under the
3 eyes; what specifically Mr. Depp did to her that
4 caused that injury?
5 A. Head-butted her.
6 Q. I believe your testimony earlier today
7 was that he likely head-butted her; is that
8 correct?
9 A. I -- I -- I wasn't there. I don't know
10 if he lightly or not lightly head-butted her.
11 Q. That was -- that was your testimony,
12 that it had appeared as if she had been, quote, MS
13 "lightly head-butted."
14 Do you remember saying that earlier
15 today?
16 A. Maybe I misquote it. It is not my
17 position to say how head-butted she was or
18 anything. Maybe I misquote it.
19 Q. Okay. But you do recall Ms. Heard
20 telling you that she sustained the injuries to her
21 eyes and the bridge of her nose as a result of Mr.
22 Depp head-butting her; correct?

H; F/A;
SP; lack
of pers.
know.

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1 **A. Correct.**
2 Q. Did Ms. Heard tell you how she sustained
3 the injury to her lip?
4 **A. I don't recall.**
5 Q. Did you see any other injuries on Ms.
6 Heard as a result of what she claims was Mr. Depp
7 beating her the night prior?
8 **A. I don't recall.**
9 Q. Now, let's go to the makeup that you
10 did. She looked beautiful.
11 **A. Thank you.**
12 Q. Actually, before we go to the makeup,
13 let -- let's talk about the injury to her scalp.
14 So Ms. Heard told you that Mr. Depp,
15 what, pulled her hair or dragged her around the
16 room?
17 What -- what do you recall about Mr. --
18 what do you recall that Ms. Heard told you about
19 how she sustained the injury to her head?
20 **A. I recall that she said he dragged her by**
21 **the hair. I'm not sure what -- you know, if that**
22 **means, drag -- what does that mean. But her --**

H; F/A;
SP; lack
of pers.
know.;
cumul.

170
1 **her words I'm pretty sure was dragged, he dragged**
2 **me by the hair.**
3 Q. And did she show you the hair that was
4 missing as a result of being dragged by the hair?
5 **A. She showed us, me and the hairdresser,**
6 **the hole where the hair was missing on top of her**
7 **head.**
8 Q. Did she show you the actual hair that
9 was taken out of her head?
10 **A. I don't recall.**
11 Q. And when you say us, it was you and --
12 who was the hairdresser?
13 **A. Adir Abigail.**
14 Q. And was Ms. McMillan there as well?
15 **A. No.**
16 **Ms. McMillan was never really there when**
17 **we get ready. So it was two separate things. And**
18 **Savannah never really comes up when we get ready,**
19 **no. So she wasn't there when Amber described what**
20 **happened.**
21 Q. But just to confirm, these injuries,
22 right, that you saw on Ms. Heard on December 16th,

171
1 2015, you don't know how they were caused;
2 correct?
3 MS. BREDEHOFT: Objection, leading.
4 **A. Correct. Yeah.**
5 Q. And so any information you have about
6 how -- the cause of these injuries came from Ms. L
7 Heard only?
8 MS. BREDEHOFT: Object to leading.
9 **A. From December 16th, correct.**
10 Q. Well, any injuries. Other than Ms.
11 Heard and her friends, you never witnessed Mr.
12 Depp being violent or abusive toward Ms. Heard and L
13 causing any injuries?
14 MS. BREDEHOFT: Objection, leading.
15 **A. Correct.**
16 Q. Okay. So let's talk about the makeup
17 that you actually used to conceal these injuries
18 on her face on December 16th.
19 I believe you testified you used a
20 concealer with a peach undertone.
21 **A. Uh-huh.**
22 Q. Did you have training and experience

172
1 dealing with injuries or covering up bruising on
2 people?
3 Do you have any specific experience or
4 education?
5 **A. Specific experience.**
6 **I have experience in doing bruises and**
7 **cover bruises for special effect. Yeah. I mean,**
8 **throughout my career I have created bruises and I**
9 **also have covered bruises for -- you know, with**
10 **models or real life, whatever it is. So, yeah,**
11 **I -- I have experience in covering some bruises,**
12 **yes.**
13 Q. How about swelling? Same question.
14 **A. I mean, it's really -- it is a little**
15 **harder to cover swelling. That would be maybe,**
16 **you know, honestly, we try to bring the swelling**
17 **down. Covering -- covering it up would be not**
18 **pretty -- it would be harder.**
19 Q. And how about cuts?
20 **A. Yeah.**
21 Q. Do you have ex- --
22 MS. BREDEHOFT: Objection, leading.

<p>173</p> <p>1 Q. Go ahead.</p> <p>2 A. Excuse me?</p> <p>3 MS. BREDEHOFT: I just objected to the</p> <p>4 form of the question. I'm sorry. It was</p> <p>5 leading.</p> <p>6 THE WITNESS: Oh.</p> <p>7 MS. BREDEHOFT: Go ahead.</p> <p>8 A. So --</p> <p>9 Q. I'm sorry, Ms. Inglessis. Let me get</p> <p>10 the question on the record so it's clear.</p> <p>11 Do you have experience covering up cuts</p> <p>12 on people's faces using makeup?</p> <p>13 MS. BREDEHOFT: Objection.</p> <p>14 A. I have ex- --</p> <p>15 MS. BREDEHOFT: Go ahead.</p> <p>16 A. I have experience covering cuts. I</p> <p>17 mean, I have covered cuts, as I said, with bruises</p> <p>18 through my career, through my 20 years as a makeup</p> <p>19 artist. I have some experience in covering</p> <p>20 bruises and cuts and -- yes.</p> <p>21 Q. Okay. Specifically, as it relates to</p> <p>22 Ms. Heard's makeup look on December 16th, do you</p>	<p>175</p> <p>1 family, and I used that instead. And I think I</p> <p>2 also used -- I have a wheel that has -- is a</p> <p>3 bruise wheel, that has different colors and you</p> <p>4 pick up the color to gently touch up any darkness.</p> <p>5 Q. Would you use the same combination of</p> <p>6 concealers to cover up dark circles as well?</p> <p>7 A. Maybe the same -- maybe the same color,</p> <p>8 but not maybe the same product.</p> <p>9 Listen, dark circle is complicated so it</p> <p>10 is not like one-fits-all. But, yes, you would do</p> <p>11 a dark circle or a blue darkness. Very dark</p> <p>12 circle I might use a little peach undertone.</p> <p>13 Q. Okay. Did you make a different choice</p> <p>14 for her overall look other than the concealer as a</p> <p>15 result of the injuries that you saw on her face on</p> <p>16 December 16th?</p> <p>17 MS. BREDEHOFT: Object to the form of</p> <p>18 the question.</p> <p>19 Go ahead.</p> <p>20 A. Not a different choice, but I remember</p> <p>21 we specifically -- you know, as you -- I know you</p> <p>22 read it before. We had a red lip that was not</p>	<p>F?A; SP; lack of pers. know</p> <p>IC</p>
<p>174</p> <p>1 recall what foundation you used?</p> <p>2 A. The brand?</p> <p>3 Q. You probably don't remember the brand,</p> <p>4 but do you recall the shade that you used?</p> <p>5 MS. BREDEHOFT: Object to the form of</p> <p>6 the question, leading.</p> <p>7 A. How would I -- no. It's five years ago.</p> <p>8 Absolutely not.</p> <p>9 Q. Do you --</p> <p>10 A. The shade, no.</p> <p>11 Q. But you do have a specific recollection</p> <p>12 of -- of using a peach undertone concealer?</p> <p>13 A. Yes.</p> <p>14 And I will tell you why. Because Amber</p> <p>15 always had in her bag -- we have the same</p> <p>16 concealer. She has a concealer from a brand</p> <p>17 called "Cle' de Peau" and she has a specific</p> <p>18 shade. You know, it's beige. Beige was Amber's</p> <p>19 color for under her eyes, period. So the day,</p> <p>20 December 16th, I didn't use page beige. I used --</p> <p>21 there is another concealer that has more peach in</p> <p>22 there and orange, it's called honey, from the same</p>	<p>176</p> <p>1 uncommon for her. We know she has a natural red</p> <p>2 lip so it's not that it was like, oh, my gosh, it</p> <p>3 was a red lip.</p> <p>4 But I remember that day we specifically</p> <p>5 -- I specifically structured my makeup -- there's</p> <p>6 a couple of things we do with Amber. We do a</p> <p>7 smoky eye and a nude lip or a red lip. And I</p> <p>8 remember specifically thinking of my makeup, about</p> <p>9 that we needed to highlight there to try to not --</p> <p>10 to try to not draw attention to it. And the red</p> <p>11 lip was our only option to cover that red cut that</p> <p>12 was there. So that I remember very specifically,</p> <p>13 thinking that we had to have a red lip, sharp</p> <p>14 brows and constructive makeup to take away from</p> <p>15 there.</p> <p>16 So basically -- it is going to mean</p> <p>17 nothing to you guys. But just basically a lot of</p> <p>18 highlights up here to kind of not focus on this.</p> <p>19 I remember talking about it very</p> <p>20 clearly.</p> <p>21 Q. And forgive my ignorance, but what did</p> <p>22 you do to cover up the cut on the lip other than</p>	<p>IC; FA; SP; lack of pers. know</p>

H; F/A;
SP; lack
of pers.
know.;
cumul.

IC

Opinion; F/A; SP; lack of pers. know.	L	177	1 apply a red lip? 2 A. A red lip. That's it. A red lip. 3 It is swollen. I can see it in the 4 video on the James Corden show. So her lips was 5 swollen. It was big on that side. You can see 6 it. There's nothing I can do about that. But I 7 did -- we did a really dark lip to -- to match 8 that -- that red gash or cut, whatever that was 9 there. 10 Q. Do you recall Ms. Heard being hindered 11 as a result of the injury on her lip? 12 And when I say "hindered," I mean did 13 she have trouble opening her mouth widely or, you 14 know, did she complain about it hurting or it 15 splitting open and bleeding? 16 Do you recall any of that? 17 A. I don't recall. 18 Q. And, again, just to confirm, on December 19 15th, 2015, you don't recall seeing any injuries, 20 including a split lip, on Amber Heard; correct? 21 A. Correct. 22 Q. Okay.	179	1 would cover some of the chunk of missing hair. 2 Q. But just to confirm, you don't know how 3 that chunk of hair was missing from Ms. Heard's 4 head? 5 You don't know what caused that chunk of 6 hair to be missing; correct? 7 MS. BREDEHOFT: Objection, leading. 8 Go ahead. 9 A. I don't know it, correct. 10 Q. Okay. You don't have any personal 11 knowledge, I should say, as to how that chunk of 12 hair came to be missing from her head? 13 MS. BREDEHOFT: Same objection. 14 Go ahead. 15 A. But I never -- I mean, I did not witness 16 it, correct. 17 MS. VASQUEZ: Alex, may I please have 18 you bring up Depp 9. 19 Q. Ms. Inglessis, you've testified 20 previously that you see, watching the video clip, 21 right, you see Ms. -- 22 A. Uh-huh.	IC L L
		178	1 A. It is what it is, you guys. I can only 2 tell, you know, what I know. 3 Q. And we appreciate that. 4 Do you recall having any specific 5 conversation with the hair stylist that was doing 6 Ms. Heard's hair on December 16th, 2015 as it 7 related to the abuse that Ms. Heard was describing 8 for you? 9 A. Yeah. Yes. We -- we talked a bit about 10 it, yes. 11 Q. And what do you recall about that 12 conversation? 13 A. I mean, you know, I think everybody was 14 a little like, whoa, shit, okay. I think 15 everybody was a little surprised, everybody was a 16 little like not knowing how to move forward with 17 it, I mean. But we talked. 18 As I said, when Amber was in the chair 19 and Adir was behind her and I was in front of her, 20 I recall the three of us having this conversation. 21 And I recall Adir showing me the hole there and I 22 also recall Adir talking about doing a hairdo that	180	1 Q. -- Heard's -- you see the swollen lip 2 and you see bruising. 3 A. Yeah. I see -- I -- I've known that 4 face. I know that face so well. I've done it so 5 many times. I can tell where the bruises are and 6 I can tell where the swollen lip is, correct. 7 Q. So, Ms. Inglessis, do you mind please 8 identifying for me, is this -- does this 9 photograph accurately depict Ms. Heard on the 10 James Corden show on December 16th, 2015? 11 A. Yes. 12 MS. BREDEHOFT: Objection, foundation. 13 Go ahead. 14 A. Yes. 15 Q. And can you point to me exactly where -- 16 or describe -- I guess you can't point because 17 we're by Zoom. But can you describe for me where 18 you see bruising on Ms. Heard's face? 19 A. Well, I didn't say I saw bruise, but I 20 saw discoloration. I can see my makeup. So I see 21 the discoloration on the right eye, just right 22 under. I see the little dent there. Go up.	

<p>181</p> <p>1 Oh, okay. Is it me -- can you see -- 2 can we split -- can you guys -- can I have access? 3 Q. Yeah. 4 MS. VASQUEZ: Alex -- 5 Q. Actually, Ms. Inglessis, do you want 6 control over this and perhaps you can -- 7 A. Yes. 8 And also, I mean, this is a picture that 9 is, you know, taken -- this is not a really 10 accurate picture; she's sideways, the light is one 11 way, you know. But, yes. There are better 12 pictures that you can see. 13 But if you give me the -- the map, I 14 will show you. But there's other still picture 15 where you can see the split lip better or the 16 swollen lip. 17 Q. Let me see. 18 A. Oh. Is that me? 19 Q. So -- 20 Yes. Ms. Inglessis, I'm sorry, I'm 21 interrupting. 22 A. No, no, I just wanted to...</p>	<p>183</p> <p>1 that you -- 2 MS. VASQUEZ: I'm sorry, Alex. Can I 3 have you stay on page 3 of the ex- -- or, 4 actually, page 2 of the exhibit. Thank you. 5 Q. Ms. Inglessis, it's your testimony that F/A; SP; 6 you believe you can see swelling on the right side lack of 7 of Ms. Heard's lip? pers. 8 A. Yes. know. 9 Q. Okay. Do you see any bruising or 10 concealed bruising under her eyes? 11 A. Well, I mean, I know I concealed those 12 bruises so, yes. So I can see them because I know 13 did I it, but... 14 So that's neither here, nor there. 15 But, yeah, I mean, I can see them just 16 under her eyes. Under her right eyes (sic) I can 17 see the little gash right there. And I can -- all 18 that darkness right -- I mean, I don't have the 19 mouse anymore, but all that darkness right there, 20 that is not eye shadow and that is neither dark 21 circles from not sleeping. This is part of the -- 22 you know, the injuries showing through.</p>
<p>182</p> <p>1 So I can see there's better pictures 2 where you can see that side of her lip is swollen. 3 This here. 4 Q. And when you're -- you're pointing, just 5 to -- for the record, you're pointing to the -- to 6 the right side of Ms. Heard's lip; correct? 7 A. Correct. 8 Q. Okay. 9 A. It's here. 10 MS. VASQUEZ: Alex -- 11 Q. I'm sorry. Go ahead, Ms. Inglessis. 12 A. But -- nothing. But as I said, there's 13 better pictures. She sideways. There's better 14 pictures where you can see -- what I feel you can 15 see better. 16 Q. All right. 17 MS. VASQUEZ: Alex, do you mind 18 scrolling down to the next -- there should be 19 another photograph, same exhibit. 20 Q. It might be the same photograph. 21 A. Yeah, she's still sideways. 22 Q. But it's your testimony, Ms. Inglessis,</p>	<p>184</p> <p>1 Q. And where -- do you see any 2 discoloration or bruising on the bridge of her 3 nose? 4 A. I do not, no. 5 I must have done a great job there. 6 Q. Okay. 7 MS. VASQUEZ: May I please have you 8 scroll down to -- I believe it's page 8 of 9 the exhibit. 10 MS. BREDEHOFT: Can I ask just what -- 11 what number is this exhibit? I'm not clear. 12 Alex, did you label it successively or 13 did you label it on Depp? 14 The reason I'm asking, Camille, is 15 because earlier I saw that he was -- go 16 ahead, Alex. Go ahead. 17 REMOTE TECHNICIAN: Certainly. This is 18 Alex, the tech speaking. I've labeled this 19 Exhibit Number 33. 20 MS. BREDEHOFT: Okay. Thanks. That's 21 what I thought. 22 MS. VASQUEZ: Thank you, Alex.</p>

F/A; SP;
lack of
pers.
know.

F/A; SP;
lack of
pers.
know.

A. But -- nothing. But as I said, there's
better pictures. She sideways. There's better
pictures where you can see -- what I feel you can
see better.

Q. It might be the same photograph.
A. Yeah, she's still sideways.

<p>1 MS. BREDEHOFT: Camille, what he's been 2 doing, just so you know as well, when you 3 call them Depp 1, 2, 3, whatever, he's just 4 adding them on to what I did so they're 5 Inglessis, you know, 29, 30, 31, 32. I just 6 wanted to make sure the record was clear on 7 that, so. 8 MS. VASQUEZ: Got it. Thank you. 9 Alex, may I have you please just Zoom -- 10 well, Zoom in, but also go down just a bit, 11 if you don't mind. Thank you. 12 Q. Ms. Inglessis -- 13 MS. VASQUEZ: Oh. Actually, too much. 14 Thank you. I think that's fine, Alex. 15 Q. Ms. Inglessis, do you recognize the 16 person in this photograph to be Amber Heard? 17 A. Yes. 18 Q. And is it fair to say that this is Amber 19 Heard on December 16th at the James Corden show? 20 A. Yes. 21 Q. Okay. Do you see any part of her lip 22 that's more swollen in this photograph?</p>	<p>185 1 that I don't know the right term. She had a 2 swollen lip. 3 The picture below -- if you can Zoom on 4 the picture alone with James Corden, you can see 5 there to her right that her lips is swollen there. 6 I can see exactly where it is. 7 Q. Okay. 8 A. So is it a split? It's a cut? Well, I 9 can see. Well, it is hard to, but I can -- I can 10 see it. It's -- she had a cut to her lip and it 11 was swollen. 12 Q. Okay. Okay. 13 MS. VASQUEZ: Thank you, Alex. 14 Ms. Inglessis, we're almost done. Just 15 going through. Do you want to take a break? 16 Does anybody need a break? I have maybe 17 another 15 minutes or so left. 18 THE WITNESS: I would rather just go 19 straight through, if everybody's okay. 20 MS. VASQUEZ: That's fine. That's fine. 21 Making sure everybody is okay. 22 April and Jean-Louis?</p> <p>187</p>
<p>F/A; SP; lack of pers. know.; opinion</p> <p>186 1 A. I mean, you can -- you can't be serious 2 with this photograph. I mean, it's so blurry. 3 You know what I mean? I can't -- no. I mean, it 4 is not an accurate -- I can't, no. 5 Q. But I just want to confirm, Ms. 6 Inglessis -- 7 MS. BREDEHOFT: Let her finish. 8 A. Yeah. I mean, this picture is -- you 9 know, it's not -- how can I see anything? You 10 can't even -- you can't even read "The Late Show" 11 properly. It's -- it's absolutely not clear. 12 It's not shown. It's not a good depiction of the 13 makeup or her face that day. You know, this is 14 Zoom, Zoomed a thousand times and -- it's so 15 pixilated. So, I mean -- 16 Q. Ms. -- I just want to confirm, your 17 testimony is that it was a cut lip; right? 18 A split lip that Ms. Heard had when you 19 did her makeup on December 16th, 2015? 20 A. Well, I don't know -- I -- I -- I said 21 it was a split lip, but, as I say, I'm not a 22 medical -- I don't want to hold on to the term</p> <p>IC</p>	<p>188 1 THE COURT REPORTER: (Indicating). 2 MS. VASQUEZ: Okay. Great. 3 Q. I believe you previously testified that 4 you attended Ms. Heard's birthday party, birthday 5 dinner on April 21st, 2016; is that correct? 6 A. Correct. 7 Q. Do you recall who else was in attendance 8 for that dinner? 9 A. Yeah. So myself, Rocky, I'm assuming 10 Josh, Amanda de Cadenet and maybe two or three 11 other people that I don't know, and Johnny. 12 Q. Do you recall Mr. Depp arriving on time 13 for the dinner or did he arrive late? 14 A. He arrived very late. 15 Q. Okay. And what was his demeanor when he 16 arrived on April 21st, 2016, if you remember? 17 A. I mean, I don't really recall anything 18 specific. 19 I mean, he's -- he's a -- he's a strange 20 character. You know, it's very difficult to give 21 him -- to have like a -- a normal compass on how 22 to -- I -- I -- what I'm trying to say, first of</p> <p>F/A; SP; lack of pers. know. impr. char. evid.</p> <p>IC</p>

<p>189</p> <p>IC 1 all, I don't know him very well so I don't know if 2 his demeanor was right or left. So far, so good. 3 His demeanor was fine.</p> <p>SP 4 Q. Did he appear inebriated to you? 5 A. No to me.</p> <p>6 Q. Did he appear to be under the influence 7 of drugs? 8 MS. BREDEHOFT: Objection, calls for 9 speculation and expertise. 10 A. I don't know. 11 MS. VASQUEZ: No. It's her impressions, 12 Elaine. I said, did he appear to be under 13 the influence of drugs. I didn't ask her if 14 he had taken drugs. 15 A. I don't know. 16 MS. BREDEHOFT: Same objections, 17 hearsay, foundation, calls for speculation, 18 expertise. 19 Q. Did you see Mr. Depp do any drugs on 20 April 21st, 2016? 21 A. No. 22 Q. Did you ever see Mr. Depp do any drugs?</p>	<p>191</p> <p>1 you prior to her birthday that her and Mr. Depp 2 were separating? 3 A. I don't recall. 4 MS. VASQUEZ: Alex, do you mind please 5 pulling up Depp 10. 6 A. Okay. 7 Q. Sorry. Just -- just a quick second. 8 Ms. Inglessis, turning your attention to 9 the text message halfway down on this -- well, 10 first, have you ever -- do you believe this 11 document accurately reflects messages -- text 12 messages exchanged between you and Ms. Heard? 13 MS. BREDEHOFT: Objection, leading, 14 foundation, hearsay. 15 Go ahead. 16 A. Do I currently remember if those texts 17 were between me and Amber four years -- nearly 18 five years? I mean, no, I -- 19 Q. Do you have any reason to doubt that 20 these are an accurate depiction of text messages 21 you exchanged with Ms. Heard? 22 A. No.</p>
<p>190</p> <p>F/A; SP; lack of pers. know. 1 A. No. 2 Q. Okay. Did you ever see Ms. Heard do 3 drugs? 4 A. No. 5 MS. BREDEHOFT: Objection, hearsay, 6 leading, foundation. 7 You probably want to say that answer 8 again because I interrupted you. I think 9 your answer was no. 10 A. No. 11 MS. BREDEHOFT: I apologize. 12 MS. VASQUEZ: Yes, I know, Elaine, you 13 want to highlight that one. Not surprised. 14 THE WITNESS: You're killing me. Oh, my 15 God. Oh, my. 16 Q. Do you recall Ms. Heard drinking alcohol 17 on her birthday? 18 A. Yes. 19 Q. Do you recall if -- if you believed it 20 was an -- was she drinking excessively? 21 A. No. 22 Q. Okay. Do you recall Ms. Heard telling</p>	<p>192</p> <p>1 Q. Okay. Do you see halfway down you 2 write, "Things are really weird ?!?! I thought 3 everything was fine and better"? 4 And Ms. Heard writes, "Things are really 5 and * bad. We're separating. It's hard." 6 And then your response is, "What ?!?! 7 Babe..you want to hang out tonight? What are 8 you -- what you doing? I can come by the house in 9 an hour or so. Come." 10 Do you see that? 11 A. Yes. 12 MS. VASQUEZ: And Alex, if I -- if you 13 don't mind going up to the start, the top of 14 that page. 15 Q. Ms. Inglessis, these text messages were 16 exchanged by you and Ms. Heard in January 2000-- 17 January 28th, 2016. 18 Do you recall hearing from Ms. Heard 19 that her and Mr. Depp were separating in January 20 of 2016? 21 A. I mean, I've heard that the whole of 22 2015 and most of January, so.</p>

H; F/A; SP;
lack of
pers.
know.;
cumul.

IC

IC/ F/A;
SP; lack
of pers.
know.

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1 I mean, do I remember specifically that
2 on January 28th she told me she was going to leave
3 him? No.
4 It was part of the story for a year.
5 You know what I mean? It's like -- I'm just not
6 sure, what's your question?
7 Q. Yeah.
8 MS. VASQUEZ: Thank you, Alex.
9 Q. After Ms. Heard's birthday dinner on
10 April 21, 2016, it's my understanding that some of
11 you went to Coachella for the music festival. Is
12 that accurate?
13 Were you part of that group that went
14 with Ms. Heard to Coachella Valley to attend the
15 music festival?
16 MS. BREDEHOFT: Object to the form of
17 the question, leading.
18 A. Correct.
19 Q. Who else went on that trip?
20 A. Myself, Rocky, Amber, Whitney, iO and a
21 guy. And I don't remember the name. And one of
22 Amber's friend. Well, everybody's friend. I

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1 don't know his name. I think there was six or
2 seven of us.
3 Q. Did you drive with Ms. Heard out to the
4 desert?
5 A. Sorry. And Savannah. Right.
6 No, I did not.
7 Q. Okay. Who did -- well, how did you get
8 to Coachella Valley?
9 A. I got to Coachella Valley with Savannah
10 McMillan. I was supposed to go with them and I
11 decided not to, so I drove with Savannah.
12 Q. So is it fair to say that you saw Ms.
13 Heard once you arrived to Coachella on or about
14 April 17th, 2016?
15 MS. BREDEHOFT: Objection, leading and
16 foundation, hearsay.
17 Go ahead.
18 A. If that's the date of the Coachella Film
19 Festival, yes.
20 Q. Do you recall anything about Ms. Heard's
21 appearance when you first encountered her in
22 Coachella Valley?

195
1 A. No, I don't recall.
2 Q. Did you notice any injuries on Ms. L
3 Heard?
4 MS. BREDEHOFT: Objection, leading.
5 A. I don't recall.
6 Q. Do you recall Ms. Heard discussing any H; F/A;
7 abuse that she had sustained the night of her SP; lack
8 birthday on April 21st, 2016, by Mr. Depp? of pers.
9 A. Yes. know.
10 Q. What do you recall about that?
11 A. I recall there was a fight. There was
12 a -- I don't remember -- I don't recall exactly
13 the fight. I know there was a fight and there was
14 some problem, that's why they were late coming
15 back to Coachellas. I don't recall exactly what
16 she told me, but there was some problem the night
17 before, yes.
18 Q. But you don't remember seeing any
19 injuries on Ms. Heard after her birthday dinner in L
20 April of 2016; correct?
21 A. I don't recall.
22 MS. BREDEHOFT: Objection, leading.

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1 MS. VASQUEZ: I'm sorry.
2 And, April, I don't know if you got
3 that, but you --
4 Q. I'm sorry, Ms. Inglessis. May I please
5 have you repeat that answer.
6 A. I don't recall.
7 Q. Do you recall Ms. Heard asking you to do
8 her makeup while you were at Coachella?
9 A. No.
10 Q. So you didn't do Ms. Heard's makeup; is
11 that correct?
12 A. Correct.
13 MS. VASQUEZ: I only have maybe ten more
14 minutes left and I actually do need a break.
15 So may we take a ten-minute break and then
16 come back on the record at 1:10.
17 THE WITNESS: Okay.
18 THE VIDEOGRAPHER: All right. It is
19 3:59 p.m. We go off the record.
20 (A recess was taken).
21 THE VIDEOGRAPHER: It is the beginning
22 of video number four of the testimony of

<p>197</p> <p>1 Melanie Inglessis. It is 4:12 p.m. We are 2 back on the record. 3 BY MS. VASQUEZ: 4 Q. Ms. Inglessis, I believe you testified 5 previously that most of your interactions with Mr. 6 Depp took place before you were aware of how -- 7 the extent of the abuse that Ms. Heard allegedly 8 was suffering through. Is that -- is that a fair 9 and accurate statement of your testimony? 10 A. Yes. 11 Q. Okay. And it was after you became 12 aware. Would you agree that was after December of 13 2015? 14 A. (No response). 15 Q. Did your relationship change with Mr. 16 Depp after December of 2015? 17 A. I had -- I have no relationship with Mr. 18 Depp so it didn't change. 19 Q. Did your impression of Mr. Depp change 20 after December of 2015? 21 A. Yes. Yes. I would say my impression 22 of -- of him changed, yes.</p>	<p>199</p> <p>1 In a taxi. I was going to eat first. I am 2 starving. But will get something from you." 3 A. Uh-huh. 4 Q. "Ten away." It looks like a heart 5 emoji. 6 A. Yes. 7 Q. "I am bored to do Johnny makeup also 8 ?!?! Hired for Met." 9 A. Uh-huh. 10 Q. And then Ms. Heard responded to you and 11 said, "I suggested that when things were go so I 12 had no idea. A, is that going to be" -- I'm 13 sorry. "Is that going to weird for you? For me, 14 no worries, but FU? And B, is that going to be 15 too" much -- or too -- I believe she meant much, 16 M-U, "like for your time for you?" And you 17 respond, "It's not weird at all. It's more about 18 timing and I want my time with you. And Johnny 19 won't want to get ready 2 hours earlier. I have a 20 bad-ass little assistant that is going to stay 21 with you and Johnny. I can tell her what to do on 22 Johnny and she can do it, if timing works at</p>
<p>198</p> <p>1 Q. Okay. 2 MS. VASQUEZ: Alex, may I please have 3 you bring up Exhibit Depp 12, please. 4 (Exhibit 33 was marked for 5 identification and is attached to the 6 transcript). 7 Q. Ms. Inglessis, I'm going to show you 8 what appears to be text messages between you and 9 Ms. Heard that have been produced by Ms. Heard 10 dated April 27, 2016. 11 A. Uh-huh. 12 Q. This was at or about the time, just to 13 give you the context, of the Met Gala. 14 A. Uh-huh. 15 Q. Do you recall asking Ms. Heard whether 16 you should do Mr. Depp's makeup for his appearance 17 at the Met Gala in 2016? 18 A. I don't recall asking Amber that, no. 19 Q. Okay. I'm going to direct your 20 attention, if I can, to the text messages at -- 21 your text messages labeled "Melanie Inglessis," 22 about a third of the way down. It says, "Okay.</p>	<p>200</p> <p>1 better." 2 A. Uh-huh. 3 Q. Do you recall sending Ms. Heard a 4 message saying that it wasn't weird for you at all 5 to do Mr. Depp's makeup on or around April of 6 2016? 7 MS. BREDEHOFT: I am going to object to 8 the improper use of the exhibit and improper 9 questioning and leading, hearsay and 10 foundation. 11 Go ahead. 12 A. Do I recall sending that text? No. But 13 it's there so here it is. 14 Q. Do you recall feeling that it wasn't 15 weird to do Mr. Depp's makeup for the Met Gala in 16 2016? 17 MS. BREDEHOFT: Objection, leading, 18 hearsay, foundation. 19 Go ahead. 20 A. Well, I remem- -- I don't remember, but 21 my assumption was that if it was okay with Amber, 22 than it was okay with me.</p>

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1 Q. So you were okay doing the makeup of a
2 man that was beating on your close friend and
3 client?

4 A. I guess I was okay doing the makeup. I
5 was okay touching up the makeup, if Amber was
6 okay.

7 Q. Okay.

R

8 A. Correct. If -- if -- if Amber was fine
9 and still in her relationship, going with Johnny,
10 I was hired as a makeup artist to do Johnny's
11 makeup, so I was fine with it, correct.

12 Q. Yeah.

13 I believe your text message was it
14 wasn't weird for you at all; is that correct?

15 MS. BREDEHOFT: Object.

16 A. Yeah.

17 MS. BREDEHOFT: Hold on.

18 Object. I am going to object to the
19 improper use of the exhibit and to the
20 leading and it doesn't -- doesn't accurately
21 depict, hearsay and foundation.

22 Go ahead.

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1 Q. Okay. When you did interact with Ms.
2 Heard the week after May 21, 2016, do you recall
3 seeing any injuries on Ms. Heard?

4 MS. BREDEHOFT: Objection, leading.

5 Go ahead.

6 A. What happened on May 21? What -- why is
7 it --

8 Q. I don't get to answer the questions.

9 A. No. Wait. Why is it -- what
10 happened -- I'm trying to understand why you're
11 placing me after May 21st.

12 Q. Let's bring you to -- well, I believe

13 Ms. Bredehoft actually did say to you that Ms.

14 Heard sought and obtained a temporary restraining
15 order on or about May 27, 2016.

16 So prior to that date, do you recall
17 seeing any injuries on Ms. Heard?

18 MS. BREDEHOFT: Objection to the form of
19 the question. A number of things in there,
20 including leading, hearsay and foundation.

21 Go ahead.

22 A. I do not recall.

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1 A. Yeah, you -- you -- you making -- you --
2 you implying what I meant by it's not weird at
3 all. What I -- I didn't -- what do you think I
4 meant is it's not weird at all for them to be
5 together. If Amber and Johnny decide to stay
6 together, it's not weird for me to come and do
7 both of their makeup and be hired, correct, yes.

8 Q. Okay.

9 A. He's not abusive to me, never has been.
10 So it wasn't weird for me. However she decide to
11 handle her relationship, that's up to her.

12 Q. And you had also never seen Mr. Depp be
13 abusive towards Ms. Heard either; correct?

14 A. Correct.

15 MS. BREDEHOFT: Objection, foundation.

16 Q. Okay. Final incident, Ms. Inglessis.
17 May 21, 2016. I believe you testified previously
18 that you do recall interacting with Ms. Heard
19 after May 21st, 2016, before she filed for divorce
20 and sought the temporary restraining order. Is
21 that -- is that accurate?

22 A. That's accurate.

1 Q. Okay.

2 MS. VASQUEZ: Alex, can I please have
3 you bring up Depp 14.

4 (Exhibit 34 was marked for
5 identification and is attached to the
6 transcript).

7 Q. Ms. Inglessis, do you have any reason to
8 believe that this isn't an accurate depiction of
9 text messages you exchanged with Ms. Heard on or
10 about May 24th, 2016?

11 A. No.

12 Q. Turning your attention to a text from
13 Ms. Heard where she writes -- I might be off.

14 MS. VASQUEZ: Alex, I might have you
15 scroll down slightly, please. Thank you.

16 Q. In blue, Ms. Inglessis, do you see a
17 text message from Ms. Heard where she writes,
18 "Hey, Babe, we're thinking of little S-I-S-T for
19 dinner. How does that sound for you?"

20 A. Uh-huh.

21 Q. And then you respond, "Great." Ms.
22 Heard says, "Where are you now? Home," you

<p>205</p> <p>1 respond, "Watching a stupid movie." And then Ms. 2 Heard says, "Meet us at 9:30?" And you write, 3 "Yes." 4 And then Ms. Heard -- 5 MS. VASQUEZ: On the next page, Alex. 6 Thank you. 7 REMOTE TECHNICIAN: This is Alex 8 speaking. This document is one page, Ms. 9 Vasquez. Is there another exhibit? 10 MS. VASQUEZ: There should be. 11 Perhaps, Ms. Calnan can help us with 12 that. 13 Why don't we go off the record for a 14 quick second and see if we can find the 15 second page to this exhibit. 16 THE VIDEOGRAPHER: It is 4:22 p.m. We 17 going off the record. 18 MS. VASQUEZ: Thanks. 19 (Pause in Proceedings). 20 THE VIDEOGRAPHER: It is 4:23 p.m. We 21 are back on the record. 22 MS. VASQUEZ: Alex, may I have you</p>	<p>207</p> <p>1 (Exhibit 36 was marked for 2 identification and is attached to the 3 transcript). 4 Q. Do you recall seeing any injuries on Ms. 5 Heard's face at that dinner on May 24th, 2016? 6 MS. BREDEHOFT: Objection, leading. 7 Go ahead. I'm sorry, go ahead. 8 A. I don't recall. 9 Q. Do you recall seeing any injuries on Ms. 10 Heard before she filed for divorce and sought and 11 obtained a temporary restraining order the week of 12 May 21st? 13 MS. BREDEHOFT: Objection, leading. 14 A. I don't recall. 15 Q. Do you recall Ms. Heard asking you to 16 apply any makeup to any injuries on her face the 17 week of May 21st, 2016? 18 MS. BREDEHOFT: Objection, leading. 19 A. No, no, no, she has -- she did not. 20 Q. Do you recall Ms. Heard's general 21 demeanor at the dinner on May 24th, 2016? 22 A. What I remember about that dinner is</p> <p>L</p> <p>IC; F/A; SP; lack of pers. know.; H</p>
<p>206</p> <p>1 please bring up Exhibit 15, then, Depp 15. 2 (Exhibit 35 was marked for 3 identification and is attached to the 4 transcript). 5 BY MS. VASQUEZ: 6 Q. Ms. Inglessis, do you see a text message 7 from Ms. Heard that continues on, "We're here," 8 and you write back, "Me, too. Waiting for valet"? 9 A. Yes. 10 Q. Do you recall meeting Ms. Heard for 11 dinner on or about May 24th, 2016, in downtown Los 12 Angeles? 13 A. Yes. 14 Q. Okay. And do you recall who was at that 15 dinner besides you and Ms. Heard? 16 A. Maybe -- definitely Rocky and maybe 17 Whitney. I'm not sure. But definitely me, Rocky 18 and Amber. Most likely Whitney, but I'm not -- 19 I'm not 100 percent sure. 20 MS. VASQUEZ: Thank you, Alex. We can 21 remove that exhibit. 22</p>	<p>208</p> <p>1 that she was -- and I'll tell you why I remember 2 this clearly. Because she was very distraught and 3 she was very confused if she should file or not 4 for divorce, and she was really sad and upset and 5 angry and -- all of it. 6 And I remember that because that night I 7 actually physically took her phone so she should 8 not -- so that if Johnny tried to -- if Johnny 9 tried to reach -- reach out to her again, she 10 wouldn't have a phone that night and she would go 11 -- she would go through the divorce tomorrow, the 12 next day. So I remember physically having her 13 phone. And when I dropped -- when I dropped them 14 back at the penthouse, she said keep my phone so 15 if he contact me I won't know, I won't cave and I 16 will file for divorce tomorrow. So I went home in 17 my house with her phone. 18 And that's why I remember. That's why 19 it's sticking out. 20 And then the next morning, as you can 21 see in those texts, she said I need my phone. And 22 then I had to drive to the penthouse and give her</p> <p>H; F/A; SP; lack of pers. know.; R; IC</p>

H; F/A;
SP; lack
of pers.
know.

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1 her phone back. And at the time, that day, I'm
2 assuming that she filed for divorce. And that day
3 the whole circus started.
4 Q. While you had Ms. Heard's phone that
5 evening, do you recall if Mr. Depp tried reaching
6 her?
7 A. I don't recall. I couldn't -- I mean, I
8 don't have access to her phone.
9 Q. But did it ring while it -- you had it
10 in your possession?
11 A. I don't really recall.
12 I mean, I don't think it was on ring.
13 It was on silent. I mean, I didn't take her phone
14 to spy on the phone. I just took the phone so she
15 would just not feel the urge to not go through
16 with the divorce if he called her.
17 Q. Okay. And you -- you believed that Ms.
18 Heard should go through with the divorce; correct?
19 A. Correct.
20 Q. And -- and that was based on what
21 exactly, Ms. Inglessis?
22 A. On what she told me, on -- on -- on --

IC; H

IC; H

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1 on her reflection of the marriage.
2 Q. Okay. And, again, just to confirm, you
3 never, yourself, witnessed Mr. Depp be violent,
4 abusive toward Ms. Heard?
5 MS. BREDEHOFT: Objection, leading.
6 A. Correct.
7 Q. And so any opinions you had as to why
8 Ms. Heard should file for divorce, that was all
9 based on what Ms. Heard and her friends had told
10 you; correct?
11 MS. BREDEHOFT: Object. Objection,
12 hearsay, leading, foundation.
13 A. Correct.
14 MS. VASQUEZ: I have nothing further.
15 Thank you very much, Ms. Inglessis.
16 THE WITNESS: Thank you.
17 MS. BREDEHOFT: I do have a few
18 followups. And I'm going to try to make it
19 as quick as I can for you because I really do
20 appreciate your time.
21 EXAMINATION
22

211
1 BY MS. BREDEHOFT:
2 Q. You said, when we were talking about
3 Amber -- at the very end, Amber filing for divorce
4 on that Friday, May 27, you said that's when the
5 "whole circus started." What did you mean by
6 that?
7 A. I don't -- I don't know if I -- the
8 exact date -- you know, I don't recall the exact
9 date, but I recall one of the day -- and you are
10 probably right, it is probably the day after that
11 dinner, where we were all in the penthouse and she
12 felt that not only she had to go through divorce,
13 but she felt that Johnny's lawyers already will
14 try to assassinate her character and that -- that
15 day she became, you know, really upset and angry
16 because at -- you know, at -- to my knowledge, she
17 wanted a quiet divorce and I think so that day we
18 were all aware that it was going to become a
19 big -- a big press war.
20 MS. VASQUEZ: Objection. I'm going to
21 move to strike as non-responsive and hearsay.
22 Q. The -- let's go back for just a moment.

H; F/A;
SP; lack
of pers.
know.

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1 You were shown the last two exhibits
2 that were Inglessis 36 and 37.
3 MS. BREDEHOFT: I'm just going to ask,
4 Alex, can you bring up 36 just very briefly.
5 And if you could go in -- is that the
6 last one -- oh, yeah. Yep. Yep. That's it.
7 Q. Ms. Inglessis, I'm going to ask you to
8 take a look at what has been marked as number 36.
9 MS. BREDEHOFT: And, Alex, if you could
10 just give me control for a moment, please.
11 Q. Okay. I'm going to ask you to take a
12 look at this part from Amber. It says, "Today's
13 for sure been the worse so far. But I'm starting
14 to feel a little better. And I'm here with sis
15 right now and was just talking to Rocky about me
16 venturing out of the house for dinner as a change
17 of" -- I think she meant pace.
18 Do you recall what -- why that was the
19 first day so far?
20 Do you recall her telling that?
21 MS. VASQUEZ: Objection, calls for
22 speculation.

H; F/A;
SP; lack
of pers.
know.;
R;
vague &
ambig.

H; F/A;
SP; lack
of pers.
know.

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1 A. I mean, the date -- I don't know the
2 timeline, but I'm assuming because she was torn
3 between divorcing or divorcing, divorcing or
4 divorcing and eventually going through with it.
5 Q. Okay. Now, you were asked several times
6 by Ms. Vasquez whether Amber Heard -- whether you
7 saw any injuries on Amber Heard during the week of
8 May 21st, and I believe you said she didn't
9 recall; is that correct?

10 MS. VASQUEZ: Objection, misstates her
11 testimony.

12 Q. Is that correct?

13 A. Right.

14 Q. Okay. And do you know whether Amber
15 Heard was wearing makeup during the week of May
16 21st?

17 MS. VASQUEZ: Objection, vague and
18 ambiguous as to time, compound.

19 Q. Let me re-ask it.

20 I think you testified earlier that
21 Amber's practice was to wear concealer, some
22 foundation, moisturizer, things of that nature.

Vague &
ambig;
H; F/A;
SP; lack
of pers.
know.

214
1 Was there -- do you have any
2 recollection that Amber strayed from that and did
3 not wear makeup during the week of May 21st, 2016?

4 MS. VASQUEZ: Objection, assumes facts
5 not in evidence, calls for speculation.

6 A. No.

7 Q. Do you have any recollection that week
8 of thinking, oh, my goodness, Amber Heard
9 doesn't -- isn't wearing her makeup this week?

10 MS. VASQUEZ: Objection, vague and
11 ambiguous, assumes facts not in evidence.

12 A. No.

13 Q. Do you know what injuries Amber Heard
14 had as a result of the altercation with Johnny
15 Depp on May 21st, 2016?

16 MS. VASQUEZ: Objection, assumes facts
17 not in evidence, compound, lack of
18 foundation.

19 A. No. No. No.

20 Q. Okay. Do you have a recollection of
21 discussing what types of injuries she had?

22 A. Well, I have -- I recall there was a in-

IC

215
1 -- a phone incident. What day, I don't recall.
2 If it's that day or this day or the other day.
3 But there was a -- a -- a phone incident, but I
4 don't recall much.
IC; F/A;
SP; lack
of pers.
know.

5 Q. Okay. Now, you were asked by Ms.
6 Vasquez about what you can do with makeup for
7 swelling. And you said it's a little bit more
8 difficult with makeup. And I think what you
9 indicated was other than bringing the swelling
10 down. Do you recall that testimony?

11 A. Yes.

12 Q. What did you mean by bringing the
13 swelling down?

14 A. Which mean that we can use an ice pack
15 or, you know -- or I can use a roller, a ice
16 roller to kind of gently bring the swelling down.
17 But as far as makeup, makeup is a little harder to
18 cover an eye swelling.

19 Q. Okay. So there are things to do for
20 swelling to bring them down, but it's not as easy
21 to cover that up, it's better to treat it and
22 bring it down; would you agree?

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1 MS. VASQUEZ: Objection, misstates her
2 testimony, leading, lack of foundation.

3 MS. BREDEHOFT: I'll ask it again.

4 Q. So do you know whether Amber Heard took
5 any steps to reduce her swelling during this -- in
6 preparation for the James Corden show?

7 MS. VASQUEZ: Objection, calls for
8 speculation.

9 A. Yes.

10 Q. And what was --

11 A. She -- she took Arnica. And we had
12 Arnica Gel. And she had -- she had -- she
13 always -- I always have Arnica Gel in my kit
14 anyway. And she had Arnica Gel. She prob- --
15 yeah, she used Arnica Gel and some ice.

16 Q. And what does Arnica Gel do with respect
17 to swelling?

18 A. Bring the swell --

19 MS. VASQUEZ: Objection, improper
20 question for a lay witness.

21 A. I'm a professional.

22 Q. Wait.

H; F/A;
SP;
lack of
pers.
know.;
opinion

<p>217</p> <p>1 You're a professional makeup artist; 2 aren't you? 3 MS. VASQUEZ: Yeah, but she's not a 4 doctor, Elaine. It's different. 5 A. I use -- I use -- I use Arnica Gel in my 6 kit to bring any swelling -- any swelling area of 7 my client's face down. 8 Q. And how's that typically work? 9 What's your experience? 10 MS. VASQUEZ: Same objections. 11 A. It just brings the -- you know, the -- 12 the swelling down. I mean, not drastically, but 13 it does -- it helps with the swelling a little 14 bit. 15 Q. Okay. And you used that with Amber 16 Heard in preparation for the James Corden show? 17 A. I don't recall if I used that specific 18 Arnica Gel that day. I don't recall. 19 Q. Okay. Thank you. 20 You were asked about the April birthday 21 party. And you understood that there was a fight 22 that night after you had left; is that your --</p>	<p>219</p> <p>1 side and I think you indicated you could not. But 2 you did testify to what Amber told you afterwards 3 about what was going -- what had transpired on -- 4 on the phone calls; correct? 5 A. Correct. 6 Q. Okay. And was what you heard Amber 7 saying on the phone consistent or inconsistent 8 with what Amber Heard told you later had happened 9 in the fights she had with Mr. Depp on the phone? 10 MS. VASQUEZ: Objection, overbroad, 11 compound, calls for hearsay, assumes facts 12 not in evidence. 13 A. Correct. 14 Q. I'm sorry. I -- I give you one of those 15 alternatives so I didn't do a leading. 16 Was it consistent or inconsistent 17 with -- 18 A. It was consistent. 19 Q. It was consistent? 20 A. Yeah. 21 Q. Okay. Thank you. 22 All right. Now, you were asked a few</p>
<p>218</p> <p>1 that was your earlier testimony. Do you recall 2 that? 3 A. I do. 4 Q. Okay. Do you know what injuries Amber 5 sustained as a result of that fight on her -- the 6 birthday night? 7 MS. VASQUEZ: Objection, assumes facts 8 not in evidence, and vague and ambiguous, 9 compound, calls for speculation. 10 A. I do not. 11 Q. Okay. Now, you were asked some 12 questions by Ms. Vasquez about -- a couple of 13 occasions I think you said Venice and I think you 14 thought one was London, where you were with Amber 15 and she was on the phone with Mr. Depp and they 16 had some pretty significant fights. Do you recall 17 that testimony? 18 MS. VASQUEZ: Objection, misstates her 19 testimony. 20 A. Yes. 21 Q. And Ms. Vasquez asked you whether you 22 could hear what Mr. Depp was saying on the other</p>	<p>220</p> <p>1 times here whether you could recall seeing any 2 injuries on Amber Heard the night of December 3 15th. 4 MS. BREDEHOFT: So I'm going to ask Alex 5 to bring up Exhibit Number 30. 6 Q. And you were asked some questions about 7 this earlier and -- by Ms. Vasquez. 8 And I thought it was interesting -- 9 well, let me -- let me ask you this. I think you 10 indicated at first that you thought this was a 11 couple of years ago that you had given this; is 12 that correct? 13 A. Correct. 14 MS. VASQUEZ: Objection, vague and 15 ambiguous. 16 Q. I'm sorry. I didn't get your answer. 17 A. Correct. Correct. 18 Q. Okay. And then you made a reference 19 where you said, I am 44 years old in here. I 20 hesitate to ask you your age, but how long ago 21 would this have been if you were 44 years old at 22 the time you signed this?</p>

H; F/A;
SP; lack
of pers.
know.;
opinion

H; F/A;
SP; lack
of pers.
know.

H; F/A;
SP; lack
of pers.
know.

R

<div>R; L</div> <div>1 A. Two-and-a-half years. 2 Q. Okay. So -- so two-and-a-half years ago 3 would have been -- if I'm doing my math right, 4 would have been some time in 2000 -- early 2018? 5 A. Uh-huh. 6 Q. Okay. All right. Now, I'm just going 7 to take you down this because you said everything 8 in here, if I understood correctly, was correct 9 except for that you had gotten confused on the 10 date of the Tribeca Film Festival; is that 11 correct?</div>	<div>221</div> <div>1 your recollection that there was a doctor that had 2 come to the penthouse to check on him? 3 A. Not the penthouse. 4 Q. No, no, I understand. 5 Oh, oh, I got you. 6 Do you recall a doctor coming to the L; H F/A; 7 house to check on him after Amber had tried SP; lack of 8 apparently unsuccessfully to wake him? pers. know 9 A. I remember Amber -- I remember doing 10 Amber's makeup and saying that Johnny had passed 11 out, she tried to wake him up, and then the doctor 12 came and it was two -- it was two separate -- the 13 room was quite bit. I was in one room doing 14 Amber's makeup and Johnny was in the other room 15 passed out or -- you know, so she said. And I did 16 see somebody going in. Did that person need a 17 doctor? Did he introduce himself? No. To me, 18 no. 19 Q. Okay. 20 A. That's what Amber told me.</div>
<div>12 MS. VASQUEZ: Objection, leading and 13 misstates her testimony. 14 A. Correct. 15 Q. Okay. Well, what, if anything, was 16 incorrect in this Declaration other than the date 17 of the meeting, of the January 2015? 18 A. No. No. 19 Q. Nothing else was? 20 A. No. 21 Q. Okay. So I'm going to take you down 22 to -- through this.</div>	<div>223</div> <div>21 MS. VASQUEZ: I am just going to lodge a 22 late objection that this is inappropriate,</div>
<div>H; F/A; SP; lack of pers. know.</div> <div>1 And you said you met Johnny Depp at the 2 penthouse some time in 2015. "Amber had casually 3 invited me over and Johnny was there having his 4 haircut. Oftentimes, I -- when I visited Amber, 5 Johnny was in the penthouse minding his own 6 business. On other occasions, I saw Johnny in an 7 intoxicated state with a doctor who had come into 8 his penthouse to check on him after Amber had 9 tried apparently unsuccessfully to wake him." 10 Now, at the time you wrote this, this 11 was accurate and accurately reflected your memory; 12 is that correct?</div>	<div>222</div> <div>1 Elaine. You're leading your own witness, but 2 that's fine. 3 BY MS. BREDEHOFT: 4 Q. All right. So, Ms. Inglessis, I'm going 5 to ask you to take a look at paragraph 6 here. 6 And it says, "However, I remember numerous 7 conversations in which Amber would tell me that 8 Johnny had abused me. Just about every 9 conversation alternated between her love for him 10 and the problem of his abuse. These conversations 11 took place well before she divorced Johnny and got 12 a restraining order against him." 13 Was that your recollection at that time? 14 MS. VASQUEZ: Objection, compound, the 15 document for speaks for itself, hearsay. 16 A. Yes. 17 Q. The next -- the next line says, "The 18 first time" -- I'm sorry. I just got ahead of 19 myself here. 20 "The first time I saw physical evidence 21 of Johnny's abuse was before Amber was scheduled 22 to appear on The Late Show with James Corden.</div>
<div>13 MS. VASQUEZ: Objection, misstates the 14 record, assumes facts not in evidence. 15 This witness has already testified she 16 didn't actually draft this Declaration. 17 A. Yes, except that maybe it was not on 18 other occasion with an S. I only saw Johnny once 19 passed out. And it was not at the penthouse, it 20 was at the Sweetzer house. 21 Q. Okay. Thank you. 22 And do you recall now, does this refresh</div>	<div>224</div> <div>16 A. Yes. 17 Q. The next -- the next line says, "The 18 first time" -- I'm sorry. I just got ahead of 19 myself here. 20 "The first time I saw physical evidence 21 of Johnny's abuse was before Amber was scheduled 22 to appear on The Late Show with James Corden.</div>

L; H; F/A;
lack of
pers.
know.

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1 Amber and I were supposed to go bowling the night
2 before, but Amber told me that she could not join
3 because she had been in a bad fight with Johnny.
4 I came over to the Eastern building to apply
5 makeup before her TV appearance. And as I walked
6 into her kitchen, I saw writing on the countertop
7 in gold marker;" and then you attached the -- the
8 picture that we looked at earlier.
9 "I also saw that a number of Amber's
10 possessions had been smashed or destroyed."
11 Were these accurate statements at the
12 time you -- you signed this Declaration?

13 MS. VASQUEZ: Objection, compound,
14 hearsay, leading.

15 A. Yes.

16 Q. Okay. And then --

17 MS. VASQUEZ: Move to strike Ms.
18 Inglessis's answers. This is leading and
19 inappropriate.

20 Q. The next line is, "When I saw Amber, I
21 immediately noticed that she had a split lip and a
22 bruise near her eye. I also saw there was a chunk

H; F/A;
SP; lack
of pers.
know.

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1 of hair missing from her head. Amber told me that
2 Johnny had tried to suffocate her."

3 So what I'm going to -- this is
4 something that -- this is your Declaration that
5 you signed with this statement; is that correct?

6 MS. VASQUEZ: Objection, leading.

7 A. Yes.

8 Q. Okay. Now, does this help refresh your
9 recollection that the first time you saw Amber you
10 immediately noticed that she had a split lip and a
11 bruise near her eye?

12 MS. VASQUEZ: Objection, misstates her
13 testimony, assumes facts not in evidence,
14 hearsay, leading.

15 A. The first time maybe at -- yeah, I meant
16 when she sat in my chair.

17 Q. Okay. And also, that was when you saw
18 the chunk of hair missing from her head?

19 A. Correct.

20 MS. VASQUEZ: Same -- same objections.

21 Q. All right. And then you also say down
22 here that -- this is -- and we've asked about this

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1 before. After you finished applying her makeup
2 and Adir finished Amber's hair, "We all went to
3 the studio for Amber's appearance on James
4 Corden's show. While there, Amber turned it on
5 and hid the emotions that she had shared with us
6 at her penthouse, as I have seen her act on
7 numerous occasions -- other occasions, to prevent
8 others from learning about her troubles with
9 Johnny."

10 What had -- what emotions had Amber
11 shared with you at the penthouse?

12 MS. VASQUEZ: Objection, hearsay,
13 assumes facts not in evidence, lack of
14 foundation, leading, compound.

15 A. I mean, all the emotion we talked about
16 earlier; from anger, to sadness to, you know, an
17 area of emotion. You know, hysterical and then
18 calm down and then back to -- just up and down.

19 Q. Okay. And then it says, "However,
20 looking back on pictures of Amber from that
21 appearance, I can still see where Amber was
22 bruised and that Amber's lip had been -- had been

H; F/A;
SP; lack
of pers.
know.

228
1 injured."

2 And you've testified to that. I just
3 wanted to bring that to your attention as we go
4 through.

5 Let me ask you this. When you first saw
6 Amber after the December 15th incident, what do
7 you recall noticing the most?

Vague &
ambig.;
H; F/A;
SP; lack
of pers.
know.

8 MS. VASQUEZ: Objection, assumes facts
9 not in evidence, compound, vague and
10 ambiguous.

11 A. Can you rephrase the question, please?

12 Q. Yes.

13 Ms. Vasquez has asked you a number of
14 times whether you saw any injuries the first time
15 you saw Amber after the December 15 battle in
16 which, you know, the bed was broken, the dragging
17 across the floor, all these things.

18 So what I'm asking now is: Are you
19 saying that Amber was not injured the first time
20 you saw her and then suddenly she showed up with
21 injuries the next day?

22 MS. VASQUEZ: Okay. Let me try to break

Transcript of Melanie Inglessis
Conducted on February 2, 2021

58 (229 to 232)

<p>229</p> <p>1 this down. Assumes facts not in evidence, 2 compound, hearsay, misstates the witness's 3 testimony, lack of foundation, vague and 4 ambiguous. 5 Ms. Inglessis, if you can make sense of 6 that question, more power to you. 7 Q. Do you understand what I'm asking? 8 A. I understand what you guys asking. 9 All I can tell you, both of you, is that 10 my recollection on the day of December 15th, I do 11 not recall, either there or -- or not -- I -- I 12 understand that it makes no sense for me to have 13 covered injury on December 16th and not on 14 December 15th, why did I not see them on December 15 15th. I understand where you guys are going with 16 it. I can only tell you what I recall with the 17 truth in my heart. 18 I don't recall having the injury -- I 19 don't recall the injury being -- I don't recall 20 much of December 15th, but I do recall covering 21 injury December 16. I don't -- I don't say she 22 did or did not have an injury on December 15th. I</p>	<p>231</p> <p>1 foundation, and leading. 2 A. Yes. Many, many times. 3 That's actually a joke. I have -- I 4 have -- I have her under ten different aliases in 5 my phone. I don't even know which one is which 6 anymore. 7 Q. Okay. The last one -- the last series 8 I'm going to ask you: You were asked by Ms. 9 Vasquez whether your impressions of Mr. Depp 10 changed after you became aware of the abuse and 11 after Amber told you of that and after December 12 15th when you saw -- 15, 16, when you saw the 13 injuries and following that. 14 So I'm going to ask you, turn to 15 Inglessis number 30. No. No, no, no, not 30. 16 28. I'm sorry. 17 Ms. Inglessis, I'm going to ask you to 18 take a look at Exhibit Number 28. Does this 19 reflect the impressions that you had of Mr. Depp 20 as of July 31st, 2016? 21 MS. VASQUEZ: Objection, compound, vague 22 and ambiguous.</p>
<p>230</p> <p>1 don't recall seeing them the way I saw and I 2 covered them and discuss it with her on December 3 16th. 4 That's the best. I understand that that 5 don't make no sense. I get it. But this is my 6 truth and this is how it is. I don't recall much 7 December 15th. I don't -- I don't recall. But I 8 recall December 16th. 9 Q. Okay. 10 MS. VASQUEZ: I'm going to move to 11 strike as non-responsive. 12 MS. BREDEHOFT: I think it was very 13 responsive. 14 Okay. Alex, you can take that down. 15 Thank you. 16 Q. I just have a couple more questions. 17 Were you aware that Amber Heard had to 18 change her telephone number a few different times 19 while you knew her? 20 MS. VASQUEZ: Objection, vague and 21 ambiguous, calls for speculation, assumes 22 facts not in evidence, and lack of</p>	<p>232</p> <p>1 A. Yes. 2 Q. Okay. 3 MS. BREDEHOFT: Thank you. I have no 4 further questions and we thank you very much 5 for this. 6 You have the right to read or waive -- 7 you have the right to have this deposition -- 8 it's going to be typed up. Both of us are 9 going to order. We're going to have it typed 10 up. And -- and you have the right to receive 11 this transcript, look at it, review it for 12 any -- usually it's typographical errors or 13 if there's something that just -- a word that 14 seems weird or something like that, you can 15 go through, and it's called an errata sheet, 16 and you can look at it and make any 17 corrections and send it back to the court 18 reporter. Or you can waive signature and 19 waive the right to read it. 20 Would you like to read it or would you 21 like to waive signature? And I'm guessing -- 22 THE WITNESS: I would like -- I would</p>

H; F/A;
SP; lack
of pers.
know.;
IC


L; F/A;
SP; lack
of pers.
know.;
IC

R; F/A;
SP; lack
of pers.
know.

R

Transcript of Melanie Inglessis
Conducted on February 2, 2021

59 (233 to 236)

<p>1 like to read it. 2 MS. BREDEHOFT: Yeah. I was going to 3 say, I'm guessing from our conversation at 4 the beginning that that was your answer, but 5 I want -- I had to tell you that. 6 All right. I will work with Alex and 7 Jean-Lewis and April, I will work with you, 8 and we will arrange to send that to Ms. 9 Inglessis. 10 Ms. Inglessis, at some point I am going 11 to have to get like an e-mail address from 12 you, but I won't make you do that on the 13 record. Okay? 14 THE WITNESS: All right. Good to go? 15 MS. BREDEHOFT: Thank you very much. I 16 think we're ready to go off the record. 17 THE WITNESS: Thank you. 18 THE VIDEOGRAPHER: All right. 19 MS. VASQUEZ: Thank you, Ms. Inglessis. 20 THE VIDEOGRAPHER: So it -- it is 4:52 21 p.m. We go off the record. 22</p>	233	<p>1 STATE OF NORTH CAROLINA: 2 COUNTY OF MECKLENBURG : 3 I, April Reid, Court Reporter and Notary 4 Public in and for the State of North Carolina, 5 and whose commission expires March 4, 2025, 6 do certify that the aforementioned appeared 7 before me, was sworn by me, and was thereupon 8 examined by counsel; and that the foregoing is a 9 true, correct, and full transcript of the 10 testimony adduced. 11 I further certify that I am neither 12 related to nor associated with any counsel or 13 party to this proceeding, nor otherwise interested 14 in the event thereof. 15 Given under my hand and notarial seal in 16 Charlotte, North Carolina, this 15th day of 17 October, 2021. 18  19 _____ 20 April Reid, RPR, CRR, Notary Public 21 State of North Carolina, County of Mecklenburg 22 Notary Registration No. 20012210079</p>
<p>1 (Exhibit 37 was marked for 2 identification and is attached to the 3 transcript). 4 AND FURTHER THIS DEPONENT SAITH NOT. 5 SIGNATURE RIGHTS RESERVED. 6 (Deposition concluded at 4:52 p.m.) 7 8 * * * * * 9 10 11 12 13 14 15 16 17 18 19 20 21 22</p>	234	