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MAR 28 2022
JOHN T. FREY
Clerk of the Circuit Court
of Fairfax County, VA



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MAR 28 2022
JOHN T. FREY
Clerk of the Circuit Court
of Fairfax County, VA

**CONTAINS CONFIDENTIAL INFORMATION
PURSUANT TO THE PROTECTIVE ORDER**

Transcript of Robin Baum

Date: January 20, 2022

Case: Depp, II -v- Heard

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WORLDWIDE COURT REPORTING & LITIGATION TECHNOLOGY

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03/17

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VIRGINIA:
IN THE CIRCUIT COURT FOR FAIRFAX COUNTY

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

----- x

CONTAINS CONFIDENTIAL INFORMATION
PURSUANT TO THE PROTECTIVE ORDER

Videotaped Deposition of ROBIN BAUM
Conducted Remotely via Zoom
Thursday, January 20, 2022
12:31 p.m. Eastern Time

Job No.: 425537
Pages: 1 - 204
Reported By: AMY L. STRYKER, CCR

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Transcript of Robin Baum
Conducted on January 20, 2022

2

1 Videotaped Deposition of ROBIN BAUM,
2 conducted remotely.

3

4

5 Pursuant to subpoena, before AMY L.

6 STRYKER, Certified Court Reporter and Notary

7 Public of the State of Maryland.

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Transcript of Robin Baum
Conducted on January 20, 2022

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A P P E A R A N C E S

ON BEHALF OF PLAINTIFF JOHN C. DEPP:

LEO J. PRESIADO, ESQ.

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Transcript of Robin Baum
Conducted on January 20, 2022

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

ON BEHALF OF THE WITNESS:

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ALSO PRESENT:

CATHERINE GONZALEZ, AV Technician

KIMBERLY JOHNSON, Videographer

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Transcript of Robin Baum
Conducted on January 20, 2022

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C O N T E N T S

EXAMINATION OF ROBIN BAUM PAGE

By Ms. Pintado 10

CONFIDENTIAL PORTIONS:

17:21 18:1

Exhibit 1 - 18:8 - 18:11

19:14 - 19:18

E X H I B I T S

(Attached to transcript.)

BAUM DEPOSITION EXHIBITS

Exhibit 1	Scaramanga Bros., Inc. Transaction Detail by Account, Bates Nos. DEPP00008237 and DEPP 00008238	18
Exhibit 2	Insider article	50
Exhibit 3	E-mail dated 9/4/2015, Bates No. BAUM000990	53
Exhibit 4	Wootton Article	67
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1	Exhibit 9	Chain of e-mails dated	107
2		6/22/17, Bates Nos. CC000087	
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3	Exhibit 10	Excerpt from John C. Depp's	111
4		deposition transcript taken	
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6	Exhibit 11	Excerpt from John C. Depp's	113
7		deposition transcript taken	
		on 11/12/20, pages 622	
		through 626	
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9		5/26/16 and 5/27/16, Bates	
10		Nos. BAUM0000154 through	
		BAUM0000156	
11	Exhibit 13	People article	120
12	Exhibit 14	Chain of e-mails dated	121
13		5/30/16, Bates Nos.	
		BAUM001474 and BAUM001475	
14	Exhibit 15	Screenshot - Courtesy Getty	124
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15	Exhibit 16	Chain of e-mails dated	126
16		8/16/16, Bates No.	
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17	Exhibit 17	Chain of e-mails dated	134
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		BAUM001820	
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21		BAUM0000404 through	
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1	Exhibit 19	Chain of e-mails dated	151
2		3/11/15 and 3/12/15 with	
3		attachments, Bates Nos.	
		BAUM0000661 through	
		BAUM0000683	
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6		BAUM000988	
7	Exhibit 21	Chain of e-mails dated	157
8		2/12/16 with attachment,	
9		Bates Nos. BAUM0000358	
		through BAUM0000363	
10	Exhibit 22	Chain of e-mails dated	159
11		3/17/15 with Courier Mail	
		article, Bates Nos.	
		BAUM0000461 and BAUM0000462	
12	Exhibit 23	Chain of e-mails dated	163
13		5/27/16 and 5/29/16, Bates	
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15		6/2/16, Bates No. BAUM	
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16	Exhibit 25	The Washington Post article	169
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		BAUM0000364 and BAUM0000365	
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21		4/28/16 and 4/29/16, Bates	
22		Nos. BAUM0000618 and	
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		5/29/16, Bates No.	
2		BAUM0000349	
3	Exhibit 30	Chain of e-mails dated	186
		12/7/20, Bates Nos.	
4		BAUM002208 and BAUM002209	
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6		BAUM002214 through	
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10		8/25/16, Bates No. BAUM	
11		0000472	

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Transcript of Robin Baum
Conducted on January 20, 2022

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1	P R O C E E D I N G S	12:06:09
2	THE VIDEOGRAPHER: Here begins the video-	12:31:24
3	recorded deposition of Robin Baum, taken in the	12:31:32
4	matter of Depp versus Heard in the Circuit Court	12:31:35
5	for Fairfax County, Virginia, Case No. C-12-	12:31:37
6	CV-21-000082 [sic].	12:31:44
7	Today's date is January 20, 2022. The	12:31:48
8	time is 12:31 Eastern Time. This deposition is	12:31:52
9	being held in different locations via Zoom. The	12:31:56
10	court reporter is Amy Stryker, the video camera	12:31:59
11	operator is Kim Johnson; both are on behalf of	12:32:01
12	Planet Depos.	12:32:05
13	Will counsel please introduce yourselves	12:32:06
14	and state whom you represent.	12:32:08
15	MS. PINTADO: Good morning. My name is	12:32:08
16	Clarissa Pintado, and I represent Amber Laura	12:32:11
17	Heard.	12:32:16
18	MR. PRESIADO: I'll go. Leo Presiado for	12:32:16
19	Mr. Depp.	12:32:21
20	MS. HOUCK: Good morning. Ji-In Houck for	12:32:23
21	the deponent, Robin Baum.	12:32:26
22	THE VIDEOGRAPHER: Okay. Will the court	12:32:26

CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum

Conducted on January 20, 2022

10

1	reporter please swear in the witness.	12:32:27
2	ROBIN BAUM,	12:32:27
3	after having been duly sworn, testified as	12:32:27
4	follows:	12:32:27
5	EXAMINATION	12:32:27
6	BY MS. PINTADO:	12:32:42
7	Q Ms. Baum, can you please state your	12:32:42
8	name -- your full name and your address for the	12:32:47
9	record.	12:32:49
10	A Robin Leslie Baum, 7394 Pyramid Place, Los	12:32:51
11	Angeles 90046.	12:33:00
12	Q Thank you, Ms. Baum. And what is your	12:33:01
13	date of birth?	12:33:04
14	A 5/30/64.	12:33:04
15	Q Have you had your deposition taken before?	12:33:06
16	A Not like this.	12:33:08
17	Q In what circumstance have you had your	12:33:12
18	deposition taken?	12:33:17
19	A No -- I -- I -- actually, I don't	12:33:17
20	believe -- no, I did not have a deposition taken.	12:33:22
21	I appeared in court once.	12:33:24
22	Q Okay. And what did that court appearance	12:33:25

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Transcript of Robin Baum
Conducted on January 20, 2022

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1	involve?	12:33:30
2	A It was for my ex-husband.	12:33:30
3	Q Okay. So I'll be asking you a series of	12:33:33
4	questions. If, at any time, you don't understand	12:33:38
5	my question, please let me know. If you respond,	12:33:41
6	then I'm going to assume that you do understand.	12:33:44
7	Please also be sure to answer verbally as	12:33:47
8	opposed to nodding your head "yes" or shaking your	12:33:50
9	head "no" so that the court reporter can	12:33:53
10	transcribe accurately.	12:33:55
11	And do you have any documents in front of	12:33:57
12	you right now?	12:33:59
13	A No.	12:33:59
14	Q Do you have any other materials in front	12:34:02
15	of you right now?	12:34:03
16	A My phone and water and coffee.	12:34:04
17	Q Okay. What is -- can you describe your	12:34:06
18	occupation.	12:34:12
19	A I'm a publicist.	12:34:14
20	Q Okay. And do you work for a PR firm?	12:34:16
21	A I'm a partner in a PR firm.	12:34:19
22	Q And what's the name of that firm?	12:34:22

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Transcript of Robin Baum

Conducted on January 20, 2022

12

1	A I'm sorry, what?	12:34:26
2	Q What is the name of that firm?	12:34:28
3	A Slate PR.	12:34:30
4	Q How long have you worked there?	12:34:32
5	A I don't -- I don't know the date. I mean,	12:34:34
6	since -- since it started. I don't -- I don't	12:34:44
7	know the date or the year.	12:34:45
8	Q Since it became a business?	12:34:47
9	A Yes.	12:34:49
10	Q Were you a founding member of that	12:34:50
11	business?	12:34:57
12	A Yes.	12:34:57
13	Q Can you describe your educational	12:34:58
14	background.	12:35:03
15	A I graduated from UCLA.	12:35:05
16	Q What did you study at UCLA?	12:35:07
17	A Sociology.	12:35:10
18	Q Please describe what exactly a publicist	12:35:13
19	does in layperson's terms.	12:35:20
20	A I manage my clients' public profile.	12:35:25
21	Q How many clients do you have?	12:35:35
22	A Somewhere around 20-plus.	12:35:43

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Transcript of Robin Baum

Conducted on January 20, 2022

13

VA 1 Q And what does it mean to manage their 12:35:49

2 public profile? What does that involve? 12:35:53

3 A I handle all of their -- their press, 12:35:59

4 their appearances, anything related to promotion 12:36:06

5 of their projects. 12:36:13

6 Q And when you say you manage press, do you 12:36:16

7 receive press inquiries that you respond to? 12:36:28

8 MS. HOUCK: Objection; misstates 12:36:34

9 testimony. I believe she said she handles all the 12:36:34

10 press. 12:36:38

11 Q What do you mean by handling all the 12:36:39

12 press? 12:36:41

13 A I -- are you asking me that? 12:36:41

14 Q I am, yes. 12:36:45

15 And just a pause for a moment, there may 12:36:47

16 be objections, but you should still answer my 12:36:51

17 question unless your counsel directs you not to 12:36:54

18 answer it. 12:36:56

19 A So the question is again? 12:36:59

VA 20 Q What do you mean by managing press? 12:37:01

21 MR. PRESIADO: Same objection. 12:37:07

22 Q Just be more specific. 12:37:08

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Transcript of Robin Baum
Conducted on January 20, 2022

14

1	A I'm just trying to think about how to word	12:37:16
2	this. I -- I make recommendations to my clients	12:37:18
3	on what press they should do or not do for the	12:37:25
4	projects they're promoting.	12:37:31
5	Q Okay. What have you done -- other than	12:37:33
6	consult with your counsel, which I don't want to	12:37:45
7	hear about, what have you done to prepare for this	12:37:47
8	deposition?	12:37:50
9	A Nothing else.	12:37:50
10	Q Okay. Have you spoken with anyone other	12:37:54
11	than your counsel about this deposition?	12:37:59
12	A No.	12:38:00
13	Q Okay. Did you review any transcripts or	12:38:03
14	a -- prior testimony or witness statements?	12:38:07
15	A Nope.	12:38:09
16	Q And have you spoken with Mr. Depp or	12:38:10
17	anyone on his behalf in reference to this --	12:38:15
18	A Other than my attorney?	12:38:21
19	Q Yes.	12:38:22
20	A No.	12:38:23
21	Q Okay. Do you personally know Mr. Depp?	12:38:23
22	A Yes.	12:38:30

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Transcript of Robin Baum
Conducted on January 20, 2022

15

1	Q And how do you know him?	12:38:30
2	A I'm his publicist.	12:38:32
3	Q I'll rephrase that. Yeah. You said	12:38:38
4	you're his publicist.	12:38:41
5	When did you meet him?	12:38:42
6	A I do not remember the year, but I met him	12:38:43
7	at the Venice Film Festival for a film called	12:38:53
8	Finding Neverland.	12:39:00
9	Q You don't remember the year?	12:39:02
10	A I don't remember the year. I would be --	12:39:09
11	I would be guessing.	12:39:16
12	Q Was Mr. Depp in a relationship with Amber	12:39:17
13	Heard at the time?	12:39:23
14	A No.	12:39:24
15	Q When did you first begin -- sorry. Strike	12:39:25
16	that.	12:39:32
17	How did you -- how were you introduced to	12:39:32
18	Mr. Depp?	12:39:36
19	A His agent, Tracey Jacobs, at the time,	12:39:37
20	he -- well, he was already represented by the firm	12:39:46
21	I was with -- I was a partner in at the time	12:39:49
22	called PMK/HBH. His agent at the time, Tracey	12:39:53

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Transcript of Robin Baum

Conducted on January 20, 2022

16

1	Jacobs, wanted me to get involved or be -- to join	12:39:59
2	the team. So she and her -- his sister, Christi	12:40:04
3	Dembrowski, arranged for me to meet him in Venice	12:40:12
4	where I was already there with another client.	12:40:14
5	Q So what was -- so you met with Tracey, and	12:40:23
6	what did Tracey tell you about why Depp needed	12:40:26
7	your services?	12:40:30
8	MS. HOUCK: Objection; assume facts.	12:40:33
9	Q You can answer.	12:40:37
10	A So, yes, go ahead and answer this?	12:40:41
11	MS. HOUCK: Robin, you can answer the	12:40:44
12	question unless I specifically tell you don't	12:40:47
13	answer; then don't answer that.	12:40:49
14	THE WITNESS: Okay. I'm --	12:40:51
15	MS. HOUCK: If you understand the	12:40:53
16	question.	12:40:54
17	THE WITNESS: The reason why -- Tracey	12:40:54
18	wanted me to join the team because Johnny was	12:40:56
19	starring in Finding Neverland which also starred	12:41:02
20	Kate Winslet. And his publicist at the firm also	12:41:06
21	represented Kate Winslet and felt that it needed	12:41:09
22	another person to help because it's very hard to	12:41:13

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Transcript of Robin Baum
Conducted on January 20, 2022

17

1 be with two people at the same time. 12:41:16

2 BY MS. PINTADO: 12:41:25

3 Q Did -- what -- did you have any goals in 12:41:25

4 representing him at that time? 12:41:26

5 MR. PRESIADO: Objection; vague. 12:41:31

6 MS. HOUCK: Objection; vague. Join. 12:41:32

7 THE WITNESS: No. 12:41:41

8 Q What were your goals in representing 12:41:41

9 Mr. Depp when you first started working for him? 12:41:43

10 MR. PRESIADO: Same objection. 12:41:45

11 MS. HOUCK: Join. 12:41:46

12 Q If you understand, you can answer. 12:41:48

13 A I did not have any goals in representing 12:41:50

14 him. 12:41:55

15 Q You did not have any goals. Okay. 12:41:55

R 16 Do you represent Mr. Depp right now? 12:41:59

17 A Yes. 12:42:02

18 (The following question and answer was 12:42:02

19 designated Confidential Pursuant to Protective 12:42:02

20 Order and is bound separately.) 12:42:02

R 21 Q And how much are you paid per month to 12:42:02

22 represent Mr. Depp? 12:42:08

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Transcript of Robin Baum

Conducted on January 20, 2022

18

R 1	A 6,000 a month.	12:42:09
2	(This concludes the Confidential Pursuant	12:42:09
3	to Protective Order portion.)	12:42:12
4	Q Okay.	12:42:12
5	MS. PINTADO: I'd like to bring up	12:42:17
6	Exhibit 2.	12:42:19
7	AV TECHNICIAN: Please stand by.	12:42:21
8	(Exhibit 1, Scaramanga Bros., Inc.	12:42:21
9	Transaction Detail by Account, Bates Nos.	12:42:21
10	DEPP00008237 and DEPP 00008238, was marked for	12:42:21
11	identification and is attached to the transcript.)	12:42:31
12	MR. PRESIADO: While she's doing that,	12:42:31
13	Clarissa, is this deposition marked as	12:42:33
14	confidential under the protective order? Is that	12:42:36
15	how we're proceeding?	12:42:39
16	MS. PINTADO: I have not yet. But --	12:42:41
17	MR. PRESIADO: I'm sorry?	12:42:43
18	MS. PINTADO: I have not marked it as	12:42:44
19	confidential yet.	12:42:46
20	MR. PRESIADO: Okay. Then I request -- I	12:42:47
21	would request that last question and answer to be	12:42:49
22	marked confidential.	12:42:51

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Transcript of Robin Baum
Conducted on January 20, 2022

19

1 MS. HOUCK: I join. I think any -- 12:42:52
2 anything that delves into Ms. Baum's personal 12:42:55
3 finances should be marked confidential under the 12:42:58
4 protective order. 12:43:01

5 MR. PRESIADO: As well as Mr. Depp's. And 12:43:02
6 as the last question, those overlap. 12:43:04

7 MS. HOUCK: Agree. 12:43:06

8 MS. PINTADO: And this exhibit is marked 12:43:08
9 confidential, so I will designate this portion 12:43:10
10 confidential as well. 12:43:16

11 (The following question and answer was 12:43:16
12 designated Confidential Pursuant to Protective 12:43:16
13 Order and is bound separately.) 12:43:16

14 BY MS. PINTADO: 12:43:22

R 15 Q This says the amount -- the amount that 12:43:22
16 you were paid is \$6,150 per month. Is that 12:43:24
17 accurate? 12:43:29

18 A Yes. 12:43:29

19 (This concludes the Confidential Pursuant 12:43:29
20 to Protective Order portion.) 12:43:33

21 Q Okay. When was -- 12:43:33

22 MS. PINTADO: You can take this down. 12:43:40

CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum

Conducted on January 20, 2022

20

1	Q When was the last time that you spoke with	12:43:42
2	Mr. Depp?	12:43:44
3	A I -- I -- I can't recall the exact last	12:43:45
4	time that I spoke to Mr. Depp.	12:44:03
5	Q How often do you speak to each other?	12:44:05
6	A Not often.	12:44:08
7	Q Would you say you speak to each other once	12:44:09
8	a month?	12:44:15
9	A No.	12:44:16
10	Q Once every few months?	12:44:17
11	A No.	12:44:22
12	Q Sporadically?	12:44:25
13	MR. PRESIADO: Objection; vague and	12:44:28
14	ambiguous.	12:44:29
15	MS. HOUCK: Join.	12:44:32
16	Q How many -- how many months pass between	12:44:32
17	speaking with Mr. Depp?	12:44:37
18	A It's --	12:44:39
19	Q Let me rephrase.	12:44:48
20	Over the --	12:44:50
21	A I --	12:44:49
22	Q Over the course -- over the course of	12:44:49

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Transcript of Robin Baum
Conducted on January 20, 2022

21

1	2021, how many times did you speak with Mr. Depp,	12:44:54
2	approximately?	12:44:58
3	A Possibly zero.	12:44:58
4	Q How often did you speak with him when you	12:45:04
5	first began working for him?	12:45:10
6	A When I was with him, physically, in the	12:45:11
7	same room.	12:45:18
8	Q How often would that be?	12:45:20
9	MR. PRESIADO: Objection; vague --	12:45:24
10	MS. HOUCK: Objection; vague.	12:45:25
11	MR. PRESIADO: -- as to time frame.	12:45:26
12	MS. HOUCK: Join.	12:45:27
13	Q In the first year that you met Mr. Depp,	12:45:28
14	how often did you meet with him to speak with him?	12:45:34
15	A I -- I didn't meet with him to speak to	12:45:39
16	him. I saw him when we were -- when we -- well,	12:45:50
17	I -- I didn't meet with him to speak with him.	12:46:01
18	Q How often did you meet with him in that	12:46:06
19	first year?	12:46:09
20	A I -- I have no idea.	12:46:19
21	Q How often did you speak with him?	12:46:21
22	MS. HOUCK: Objection; asked and answered,	12:46:26

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Transcript of Robin Baum

Conducted on January 20, 2022

22

1 also vague as to time frame. 12:46:28

2 Are we still talking about the first year? 12:46:29

3 MS. PINTADO: Yes, we are. 12:46:31

FSPK 4 Q In that first year of meeting Mr. Depp, 12:46:32

5 how often did you speak with him? 12:46:35

6 A I have absolutely no memory of how often I 12:46:37

7 spoke to him in the first year. 12:46:41

8 Q Would you say it was more frequent than in 12:46:43

9 the year 2021? 12:46:48

10 A Yes. 12:46:51

11 Q What are you currently doing -- 12:47:02

12 what -- strike that. 12:47:04

FSPK 13 What type of work are you currently doing 12:47:04

14 for Mr. Depp? 12:47:06

15 A I'm setting up a Q&A for him to -- for his 12:47:07

16 movie Minamata. 12:47:19

17 Q When did he obtain that role in that 12:47:22

18 movie? 12:47:34

19 A I have no idea. 12:47:34

FSPK 20 Q What other types of work are you currently 12:47:37

21 doing for Mr. Depp, if any? 12:47:41

22 A Nothing. 12:47:43

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Transcript of Robin Baum
Conducted on January 20, 2022

23

1	Q And you're being paid over \$6,000 a month?	12:48:00
2	A Correct.	12:48:05
3	Q And what about in the year 2021, what type	12:48:07
4	of work did you do for Mr. Depp during that year?	12:48:17
5	A I --	12:48:19
6	MS. HOUCK: I'm sorry, Ms. Pintado. Is	12:48:23
7	that in 2021?	12:48:25
8	MS. PINTADO: Yes.	12:48:29
9	THE WITNESS: I organized his appearances	12:48:30
10	at various film festival -- festivals.	12:48:32
11	Q Which film festivals?	12:48:36
12	A San Sebastian, Zurich, I believe. That's	12:48:39
13	all that I can think of off the top of my head.	12:48:55
14	Q Were there films being -- were there films	12:48:59
15	of Mr. Depp being promoted at these festivals?	12:49:04
16	A Yes.	12:49:07
17	Q Which films?	12:49:08
18	A Minamata.	12:49:10
19	Q The both of them?	12:49:15
20	A I'm pretty sure.	12:49:19
21	Q Did you do any other work for Mr. Depp in	12:49:28
22	2021?	12:49:31

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Transcript of Robin Baum

Conducted on January 20, 2022

24

1	A I mean, I'm pretty sure he went to	12:49:43
2	Deauville, so I think I probably organized	12:49:51
3	Deauville. I'm --	12:49:53
4	Q And is that another film festival?	12:49:58
5	A Yes.	12:50:03
6	Q And what does the organizing of those film	12:50:03
7	festivals entail?	12:50:08
8	A I organize the days. I organize what he	12:50:10
9	does during the time that he's at the festival.	12:50:16
10	So I organize whether or not he speaks to any	12:50:20
11	press, does a Q&A, gets his photo taken.	12:50:24
12	Q Were there ever any issues with Depp's	12:50:33
13	lateness for any of those film festivals?	12:50:46
14	A I wasn't present with him.	12:50:49
15	Q Are you aware of any issues with Depp's	12:50:52
16	lateness to those festivals or any press events	12:50:56
17	related to those festivals?	12:50:59
18	MR. PRESIADO: Objection; compound.	12:51:01
19	THE WITNESS: I am not aware.	12:51:03
20	Q Do you frequently represent celebrities?	12:51:04
21	A Yes.	12:51:11
22	Q Are all of your clients celebrities?	12:51:12

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Transcript of Robin Baum
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25

1	A Yes.	12:51:15
2	Q And regarding Mr. Depp, with whom do you	12:51:18
3	communicate, if anyone, before responding to press	12:51:28
4	inquiries?	12:51:31
5	MS. HOUCK: Objection; vague as to time.	12:51:34
6	THE WITNESS: I'm sorry, I'm confused.	12:51:43
7	When you do that, am I still supposed to answer?	12:51:45
8	MS. HOUCK: If you understand, Robin.	12:51:48
9	THE WITNESS: Yes.	12:51:49
10	MS. HOUCK: And if you don't, feel, you	12:51:50
11	know, free to ask for clarification or ask	12:51:52
12	Ms. Pintado to rephrase.	12:51:55
13	THE WITNESS: I -- okay. I speak to	12:51:55
14	Stephen Deuters.	12:51:57
15	Q For every press inquiry that Mr. Depp	12:51:59
16	receives? Let me rephrase that. Do you	12:52:06
17	request -- inquiries regarding Mr. Depp, do you	12:52:13
18	always communicate with Mr. Deuters before	12:52:16
19	responding?	12:52:19
20	MS. HOUCK: Objection --	12:52:22
21	THE WITNESS: No.	12:52:22
22	MS. HOUCK: -- vague as to time.	12:52:23

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Transcript of Robin Baum

Conducted on January 20, 2022

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1	THE WITNESS: Sometimes --	12:52:23
2	MS. HOUCK: Go ahead, Robin. Well, just	12:52:25
3	give me a moment --	12:52:27
4	THE WITNESS: Sorry.	12:52:26
5	MS. HOUCK: -- to object if I need to.	12:52:28
6	THE WITNESS: Sorry.	12:52:31
7	I don't always send requests. Sometimes I	12:52:34
8	just handle them on my own.	12:52:36
9	Q Anyone else do you speak with about press	12:52:38
10	inquiries with -- regarding Johnny Depp?	12:52:42
11	MS. HOUCK: Same objection.	12:52:51
12	THE WITNESS: Sometimes his manager.	12:52:59
13	Q Who is his manager?	12:53:00
14	A Jack Whigham.	12:53:02
15	Q And why do you speak with Jack Whigham?	12:53:04
16	A To get his opinion.	12:53:14
17	Q What about Mr. Deuters, why do you speak	12:53:21
18	with Mr. Deuters prior to responding to a press	12:53:24
19	inquiry about Mr. Depp?	12:53:26
20	A So he can discuss it with Mr. Depp and	12:53:30
21	then get back to me.	12:53:33
22	Q What about Gina Deuters, do you ever speak	12:53:36

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Transcript of Robin Baum
Conducted on January 20, 2022

27

1	with her?	12:53:39
2	A Is there a time frame that we're talking	12:53:41
3	about?	12:53:46
4	Q Have you ever spoken with Ms. Deuters	12:53:46
5	about press inquiries?	12:53:49
6	A Not press inquiries, no.	12:53:51
7	Q What about Kevin Murphy?	12:53:58
8	MS. HOUCK: Objection; vague.	12:54:00
9	Q Do you ever speak with Kevin Murphy about	12:54:01
10	press inquiries regarding Mr. Depp?	12:54:04
11	A I don't know who that is.	12:54:07
12	Q Okay. Do you ever speak with	12:54:09
13	Ms. Dembrowski about press inquiries concerning	12:54:18
14	Mr. Depp?	12:54:21
15	A Not anymore.	12:54:22
16	Q Okay. But you did at one time?	12:54:23
17	A Yes.	12:54:30
18	Q When was that?	12:54:30
19	A For many -- for many years. From the --	12:54:31
20	from when I started working with Johnny till -- I	12:54:39
21	don't know the -- the date or timeline of when it	12:54:45
22	changed.	12:54:50

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Transcript of Robin Baum
Conducted on January 20, 2022

28

FSPK 1	Q Do you know why it changed?	12:54:54
2	MS. HOUCK: Objection; that calls for	12:54:58
3	speculation.	12:55:01
FSPK ⁴	THE WITNESS: I -- I don't know why	12:55:01
5	they -- why they made that change or why...	12:55:05
6	Q Were you asked by a member of Mr. Depp's	12:55:15
7	team not to communicate with Ms. Dembrowski about	12:55:17
8	press inquiries at a -- excuse me -- at a certain	12:55:21
9	point?	12:55:23
10	MR. PRESIADO: Objection to the extent it	12:55:25
11	calls for attorney-client communication. To the	12:55:27
12	extent she spoke with any attorney on Mr. Depp's	12:55:31
13	team, that's privileged, as she was an agent for	12:55:35
14	Mr. Depp.	12:55:39
15	So, Ms. Baum and Ji-In, to the extent it	12:55:41
16	calls for that, I would request that the deponent	12:55:47
17	not divulge any such communications since Mr. Depp	12:55:49
18	holds that privilege.	12:55:54
19	MS. HOUCK: I will honor Mr. Depp's	12:55:55
20	privilege with his counsel and --	12:55:58
21	MR. PRESIADO: So to be --	12:56:01
22	MS. PINTADO: And I will note that that	12:56:02

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Transcript of Robin Baum
Conducted on January 20, 2022

29

1	privilege does not apply.	12:56:03
2	But are you directing your counsel not to	12:56:05
3	answer -- your client not to answer?	12:56:06
4	MS. HOUCK: I lost the question, but if it	12:56:11
5	is invading into communications that she has with	12:56:14
6	Mr. Depp's lawyer as an agent for Mr. Depp, I will	12:56:17
7	instruct her not to answer.	12:56:21
8	To the extent that you can answer that	12:56:22
9	question without revealing that information or	12:56:25
10	breaking that privilege, you can answer.	12:56:28
11	MR. PRESIADO: Yeah, and to be clear, I	12:56:31
12	was only objecting to the stent -- to the extent	12:56:32
13	it involves such communications, and it may not.	12:56:34
14	So she may answer otherwise, from my perspective.	12:56:36
15	MS. HOUCK: And, Robin, if you need the	12:56:40
16	question reread after all that, feel free to ask.	12:56:42
17	THE WITNESS: Yes. Can you please ask	12:56:46
18	again.	12:56:47
19	MS. PINTADO: Let's have that read back.	12:56:48
20	(The court reporter read the pertinent	12:57:13
21	part of the record.)	12:57:16
22	MS. HOUCK: For the record, I'm going to	12:57:16

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Transcript of Robin Baum

Conducted on January 20, 2022

30

1 object to the extent that that calls for attorney- 12:57:17
2 client privileged information as Ms. Baum was an 12:57:20
3 agent of Mr. Depp. 12:57:21

4 But if you can answer that question 12:57:23
5 without revealing communications with Mr. Depp's 12:57:25
6 legal team, then you may do so. 12:57:28

7 MR. PRESIADO: And I join and incorporate 12:57:31
8 my last objection. 12:57:33

FSPK 9 THE WITNESS: I was asked by Mr. Depp at 12:57:39
10 some point -- and I don't know the time -- 12:57:45
11 timing -- to communicate directly with him. At 12:57:48
12 some -- at some point he asked me. 12:57:54

13 BY MS. PINTADO: 12:57:57

FSPK 14 Q Do you -- did he give you any reason? 12:57:57
15 A No. He just asked me to go through him 12:58:10
16 with all press requests. 12:58:12
17 Q What was Ms. Dembrowski's role, if any, in 12:58:14
18 Mr. Depp's publicity? 12:58:19

19 MS. HOUCK: Objection; may call for 12:58:21
20 speculation, also vague. 12:58:23

21 MR. PRESIADO: Lacks foundation. 12:58:24

22 THE WITNESS: Time -- is there a time 12:58:34

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Transcript of Robin Baum
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31

1	frame?	12:58:36
2	Q At any time did she have a role in	12:58:36
3	Mr. Depp's publicity?	12:58:39
4	A Yes.	12:58:42
5	MR. PRESIADO: Same objection.	12:58:43
6	THE WITNESS: In the early years of me	12:58:44
7	representing Mr. Depp, she handled the publicity	12:58:47
8	with me. We worked together.	12:58:59
9	Q Do you remember when you stopped working	12:59:06
10	together?	12:59:08
11	A No. I don't know the time.	12:59:09
12	Q Do you remember if it was before or after	12:59:15
13	Mr. Depp and Ms. Heard divorced?	12:59:21
14	A I don't.	12:59:24
15	Q Did you ever communicate with Christian	12:59:39
16	Carino prior to responding to press inquiries?	12:59:41
17	MS. HOUCK: Objection; vague.	12:59:44
18	THE WITNESS: I spoke to Christian Carino	12:59:52
19	about press inquiries that had to do with brands	12:59:54
20	that Christian was involved with that Johnny --	12:59:57
21	Actually, strike that. I'm confusing that	13:00:10
22	with another client.	13:00:13

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Transcript of Robin Baum

Conducted on January 20, 2022

32

1	Q That's okay.	13:00:15
2	A I -- we -- will you repeat the question.	13:00:17
3 H, FSPK	Q Did you ever communicate with Christian	13:00:22
4	Carino regarding press inquiries about Mr. Depp?	13:00:27
5	A Yes. One -- I mean, once, that I	13:00:30
6	really -- that I remember. He did an interview in	13:00:35
7	Italy that Christian Carino arranged, so I worked	13:00:39
8	with him on the details for that interview.	13:00:43
9	Q And you mentioned Jack Whigham. What did	13:00:46
10	your communications with Jack Whigham involve with	13:00:55
11	regard to press inquiries, if any?	13:00:58
12	A I mean, sometimes, as I do with all my	13:01:00
13	clients, I send to an agent or manager just to get	13:01:08
14	an opinion, if they think the same as me or	13:01:13
15	differently.	13:01:17
16	Q Okay. And did you ever communicate with	13:01:18
17	Jody Gottlieb about press inquiries regarding	13:01:22
18	Mr. Depp?	13:01:25
19	A Not about Mr. Depp.	13:01:26
20	Q What press inquiries did you communicate	13:01:29
21	with her about?	13:01:33
22	A If we got similar requests about the two	13:01:35

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Transcript of Robin Baum
Conducted on January 20, 2022

33

1	of them.	13:01:40
2	Q If you got similar requests about Amber	13:01:43
3	and Mr. Depp, you would communicate with	13:01:46
4	Ms. Gottlieb?	13:01:48
5	A Correct.	13:01:49
6	Q And why would you communicate with	13:01:50
7	Ms. Gottlieb about those requests?	13:01:53
8	A Sometimes she would reach out or I would	13:01:55
9	reach out to see if we were on the same page.	13:02:04
10	Q How do you decide whether to respond to a	13:02:09
11	press inquiry or not?	13:02:16
12	A That's a big question.	13:02:17
13	Q What are some of the considerations that	13:02:29
14	go into making that decision?	13:02:31
15	A Whether it's -- I mean, that is a really	13:02:34
16	big question. I mean, I -- I make decisions based	13:02:39
17	on whether or not it's going to either help the	13:02:43
18	client, help the project, or not move the needle	13:02:47
19	at all or not mean anything, whether it's worth	13:02:54
20	their time or not worth their time.	13:02:58
21	Q Is it -- does the -- excuse me. Does the	13:03:00
22	decision change where domestic violence or abuse	13:03:07

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Transcript of Robin Baum

Conducted on January 20, 2022

34

1	has been alleged against your client?	13:03:12
2	MS. HOUCK: Objection; vague.	13:03:17
3	THE WITNESS: I don't understand.	13:03:21
4	MR. PRESIADO: Objection; vague and	13:03:21
5	ambiguous.	13:03:21
6	Q Yeah. Does the decision-making process on	13:03:21
7	whether to respond to a press inquiry change where	13:03:24
8	there is -- where your client is faced with	13:03:27
9	domestic violence or abuse allegations?	13:03:29
10	MR. PRESIADO: Objection; vague and	13:03:33
11	ambiguous.	13:03:35
12	MS. HOUCK: Join.	13:03:35
13	THE WITNESS: I -- I don't really	13:03:36
14	understand what you're asking me.	13:03:42
15	Q Okay. I'll move on.	13:03:45
16	A Okay.	13:03:48
17	Q How many clients have you had who were	13:03:48
18	accused of domestic violence or abuse? And I	13:03:51
19	don't need you to name any names, but...	13:03:53
20	A How many clients do I represent that were	13:03:57
21	accused of alleged...?	13:04:03
22	Q Yes.	13:04:07

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Transcript of Robin Baum
Conducted on January 20, 2022

35

1	A One.	13:04:13
2	Q Do you have any other clients -- have you	13:04:14
3	had any clients that have had drug or alcohol	13:04:23
4	abuse allegations other than Mr. Depp?	13:04:25
5	MR. PRESIADO: Objection; assumes facts	13:04:32
6	not in evidence.	13:04:35
7	MS. HOUCK: I'm also going to caution --	13:04:37
8	I'm just -- it's -- this line of questioning just	13:04:40
9	makes me nervous about revealing third private --	13:04:41
10	-party privacy concerns. So, you know, I'd	13:04:45
11	caution Ms. Baum.	13:04:47
12	If you can answer the question without	13:04:48
13	revealing any confidences or third-party privacy	13:04:50
14	issues, then go ahead.	13:04:57
15	But I'm just getting a little nervous	13:04:59
16	about her revealing any private things from his --	13:05:02
17	her past clients -- past or current clients.	13:05:07
18	MR. PRESIADO: I would also object on the	13:05:09
19	grounds of relevance as to other clients.	13:05:10
20	BY MS. PINTADO:	13:05:17
21	Q If you can answer --	13:05:17
22	A I'm not really sure a hundred percent what	13:05:19

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Transcript of Robin Baum

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36

1	you're asking me. Are you asking -- if you could	13:05:22
2	clarify or reask the question.	13:05:24
3	MS. PINTADO: Could you read the question	13:05:27
4	back.	13:05:28
5	(The court reporter read the pertinent	13:05:42
6	part of the record.)	13:05:43
7	MR. PRESIADO: Same objection.	13:05:43
8	MS. HOUCK: Right. Yeah. I'm going to	13:05:44
9	join in that relevancy objection especially with	13:05:46
10	respect to third-party privacy rights.	13:05:48
11	BY MS. PINTADO:	13:05:55
12	Q You can answer without revealing any	13:05:55
13	client information other than -- if you can answer	13:06:01
14	without revealing any personal identifying	13:06:03
15	information.	13:06:05
16	A Well, I -- I -- I don't know if you're	13:06:09
17	asking me whether or not anyone has ever accused a	13:06:16
18	client to be drunk or -- I -- I'm not sure the	13:06:21
19	extent of what you're asking me about other	13:06:26
20	clients.	13:06:27
21	Q Let's go with that. Have you ever had a	13:06:28
22	client who was abused of -- accused of being	13:06:32

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Transcript of Robin Baum
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37

1	drunk?	13:06:35
2	A Not that I can remember.	13:06:36
3	Q Okay. What are the advantages to speaking	13:06:41
4	with the press in instances involving abuse, or	13:06:52
5	what are the disadvantages, if any? And I'm	13:06:56
6	talking about abuse being domestic violence.	13:07:01
7	MR. PRESIADO: Objection; vague --	13:07:04
8	MS. HOUCK: I'm going to object to this --	13:07:05
9	MR. PRESIADO: -- vague and ambiguous.	13:07:06
10	MS. HOUCK: I'm going to object because	13:07:09
11	this seems like expert test- -- expert opinion	13:07:11
12	testimony as opposed to Ms. Baum's percipient	13:07:12
13	knowledge of facts relevant to this case.	13:07:16
14	BY MS. PINTADO:	13:07:20
15	Q In your experience as a publicist, are	13:07:20
16	there advantages or disadvantages to speaking with	13:07:23
17	the press in instances involving domestic	13:07:25
18	violence?	13:07:35
19	MR. PRESIADO: Objection; vague and	13:07:35
20	ambiguous.	13:07:37
21	THE WITNESS: I mean, I would agree. I	13:07:37
22	think that it's -- I don't -- I don't know exactly	13:07:39

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Transcript of Robin Baum

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1	what you're asking me or what you are trying to	13:07:40
2	get me to say. I don't -- it seems vague.	13:07:42
3	MS. HOUCK: It's -- belated objection.	13:07:50
4	That's an incomplete hypothetical as well. I	13:07:53
5	imagine there is a lot of factors to consider.	13:07:56
6	MS. PINTADO: Ms. Houck, are you	13:08:03
7	testifying as well today?	13:08:04
8	MS. HOUCK: No.	13:08:05
9	MS. PINTADO: Okay. Then let's keep it to	13:08:06
10	strict objections and not speaking objections.	13:08:09
11	BY MS. PINTADO:	13:08:15
12	Q Is it at times important to speak to the	13:08:15
13	press about an allegation before the other side	13:08:18
14	makes a comment?	13:08:23
15	MR. PRESIADO: Objection; vague and	13:08:26
16	ambiguous, incomplete hypothetical --	13:08:28
17	MS. HOUCK: Join.	13:08:30
18	MR. PRESIADO: -- speculation, lacks	13:08:31
19	foundation.	13:08:36
20	Q If you understand, you can answer.	13:08:41
21	MR. PRESIADO: Also assumes facts not in	13:08:45
22	evidence.	13:08:48

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Transcript of Robin Baum
Conducted on January 20, 2022

39

1	THE WITNESS: I -- I can't answer that the	13:08:48
2	way you phrased it.	13:08:53
3	Q Okay. How would you describe Mr. Depp's	13:08:55
4	current reputation?	13:09:01
5	MS. HOUCK: Objection; vague.	13:09:05
6	MR. PRESIADO: Vague and ambiguous.	13:09:08
7	THE WITNESS: I also -- I -- I -- I	13:09:14
8	don't -- there's -- repeat the question. Sorry.	13:09:25
9	Q How would you describe Mr. Depp's current	13:09:31
10	reputation?	13:09:33
11	MR. PRESIADO: Vague and ambiguous, lacks	13:09:38
12	foundation.	13:09:40
13	MS. HOUCK: Join.	13:09:40
14	THE WITNESS: I can't -- I -- I -- I	13:09:52
15	don't -- I can't answer that.	13:09:53
VA, FSPK 16	Q How would you describe Mr. Depp's career	13:10:01
17	and reputation when you first started working for	13:10:03
18	him?	13:10:06
19	MR. PRESIADO: Vague and ambiguous --	13:10:06
20	MS. HOUCK: Join.	13:10:08
21	MR. PRESIADO: -- lacks foundation.	13:10:08
22	MS. HOUCK: (Inaudible.)	13:10:18

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CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum

Conducted on January 20, 2022

40

1	THE WITNESS: I can't speak to reputation.	13:10:18
2	I can only speak to pro- -- perception.	13:10:25
3	Q Okay. How would you describe Mr. Depp's	13:10:29
4	perception when you first --	13:10:32
5	A He was --	13:10:32
6	Q -- started working for him?	13:10:35
7	A He was a big movie star.	13:10:36
8	Q And how would you describe his current	13:10:38
9	perception?	13:10:48
10	MS. HOUCK: Objection; vague and	13:11:03
11	ambiguous.	13:11:05
12	MR. PRESIADO: Join.	13:11:05
13	Q Ms. Baum, has his -- has Mr. Depp's	13:11:08
14	perception changed in any way?	13:11:10
15	MR. PRESIADO: Vague and ambiguous.	13:11:14
16	MS. HOUCK: Join.	13:11:15
17	THE WITNESS: I'm sorry. Repeat the	13:11:16
18	question.	13:11:36
19	Q Has -- has Mr. Depp's perception changed	13:11:36
20	in any way?	13:11:38
21	MR. PRESIADO: Same objection.	13:11:48
22	THE WITNESS: Yeah -- I mean, I -- I think	13:11:49

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CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum
Conducted on January 20, 2022

41

1	some would say he's still a big movie star, and I	13:11:55
2	think some would say different.	13:11:58
3	Q What was Mr. Depp's public perception	13:12:00
4	before May 21, 2016?	13:12:08
5	MR. PRESIADO: Objection; lacks	13:12:13
6	foundation, calls for speculation, vague and	13:12:14
7	ambiguous.	13:12:15
8	MS. HOUCK: Join.	13:12:15
9	What was the date, Ms. Pintado?	13:12:18
10	MS. PINTADO: May 21, 2016.	13:12:20
11	THE WITNESS: What is what -- what is that	13:12:24
12	date?	13:12:27
13	BY MS. PINTADO:	13:12:27
14	Q It is -- the date, May 21, 2016. But	13:12:27
15	prior to that, was Mr. Depp a big movie star,	13:12:35
16	still, in the public perception?	13:12:38
17	A Well, I don't remember -- I don't	13:12:40
18	remember --	13:12:42
19	MS. HOUCK: Objection.	13:12:42
20	THE WITNESS: -- what May 21, 2016	13:12:43
21	represents, so I can't really answer that.	13:12:45
22	Q Okay. Before the domestic violence	13:12:48

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Transcript of Robin Baum
Conducted on January 20, 2022

42

1	restraining order that Amber Heard filed and	13:12:53
2	before the divorce, was Mr. Depp -- what was	13:12:57
3	Mr. Depp's public perception?	13:13:01
4	MR. PRESIADO: Objection; compound.	13:13:04
5	MS. HOUCK: And also calls for speculation	13:13:07
6	as to what the public perceives.	13:13:10
7	MR. PRESIADO: Lacks foundation.	13:13:13
8	Q Ms. Baum, can you answer?	13:13:17
9	A He was -- he was still a big movie star.	13:13:20
10	Q And did the domestic violence restraining	13:13:30
11	order receive a lot of publicity?	13:13:33
12	A Yes.	13:13:36
13	Q Would you describe it as negative or	13:13:42
14	positive publicity for Mr. Depp?	13:13:44
15	A Negative.	13:13:49
16	Q Did the number of media inquiries that you	13:13:50
17	received increase after the domestic violence	13:13:58
18	restraining order?	13:14:00
19	MS. HOUCK: Objection; vague and	13:14:03
20	ambiguous.	13:14:05
21	THE WITNESS: Compared to?	13:14:05
22	Q Compared to prior.	13:14:06

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Transcript of Robin Baum
Conducted on January 20, 2022

43

1 A I mean, that is a -- it's -- it's a vague 13:14:19

FSPK 2 question because when -- yes, of course, there was 13:14:21

3 a profound amount of press inquiries after that. 13:14:27

4 Q Okay. And did Mr. Depp's public 13:14:32

5 perception change after that? 13:14:39

6 MS. HOUCK: Objection. 13:14:43

7 MR. PRESIADO: Objection; vague and 13:14:44

8 ambiguous, lacks foundation, calls for 13:14:45

9 speculation. 13:14:48

10 MS. HOUCK: Join. 13:14:48

FSPK 11 THE WITNESS: I -- I can't -- I don't -- I 13:14:55

12 don't really remember. I don't know. I can't 13:14:57

13 speak for the public, but... 13:15:00

14 Q In your opinion, did his perception change 13:15:04

15 when Amber filed a domestic violence restraining 13:15:08

16 order? 13:15:12

17 MR. PRESIADO: Objection; vague and 13:15:13

18 ambiguous. 13:15:14

19 MS. HOUCK: Join. 13:15:15

FSPK 20 THE WITNESS: I don't know. I don't know 13:15:23

21 how to answer. I don't know. 13:15:25

22 Q Did that have -- did it have any impact on 13:15:26

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CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum

Conducted on January 20, 2022

44

1 Mr. Depp's reputation, when the domestic violence 13:15:32
2 restraining order was entered? 13:15:36

3 A Sorry -- I'm sorry, say that again. 13:15:38

FSPK 4 Q Did the domestic violence restraining 13:15:43
5 order have any impact on Mr. Depp's reputation? 13:15:46

6 A I can't speak to his reputation. I can 13:15:48
7 just -- but it was -- yeah, but it was not -- it 13:15:55
8 was -- it's -- it was not -- it was negative. I 13:16:02
9 mean, I -- it's not -- it wasn't a positive thing. 13:16:05

10 Q What did you do as his publicist to 13:16:08
11 counter that, if anything? 13:16:12

12 A I don't remember. I honest- -- I don't 13:16:14
13 remember. I don't remember. I don't -- I don't 13:16:34
14 know what we did right away. We may have done 13:16:35
15 nothing right away. 13:16:42

16 Q Why would you do nothing right away? 13:16:45

17 A To assess. 13:16:49

18 Q What -- what were you assessing? 13:16:52

19 A What the feedback was, what the response 13:16:56
20 was, what the press was. 13:17:05

21 Q And do you remember what that response 13:17:11
22 was? 13:17:15

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Transcript of Robin Baum
Conducted on January 20, 2022

45

1	MR. PRESIADO: Objection; vague and	13:17:18
2	ambiguous.	13:17:20
3	MS. HOUCK: Join.	13:17:20
FSPK 4	Q You said you were assessing the feedback.	13:17:24
5	What did you mean by that?	13:17:27
6	A I can -- I'm -- I can speak in general	13:17:29
7	terms, but if -- if there is a claim against any	13:17:38
8	of my clients, I usually take a beat, see what	13:17:44
9	the -- you know, the press response is, and then	13:17:54
10	decide what to do.	13:17:58
11	Q Do you remember what the press response	13:18:01
12	was?	13:18:08
13	A I mean, obviously, the press reported her	13:18:08
14	claims.	13:18:16
15	Q And then what? Then what did you do after	13:18:17
16	you assessed that?	13:18:27
17	A I don't remember other than letting the	13:18:28
18	attorneys handle.	13:18:35
19	Q It didn't seem to you like a good idea to	13:18:43
20	respond to the press inquiries about that?	13:18:46
21	A I don't remember if we responded or didn't	13:18:49
22	respond.	13:18:51

CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum

Conducted on January 20, 2022

46

1	Q	Okay. I'll come back to it.	13:18:52
2		After the restraining order, do you recall	13:18:56
3		fielding any media requests about Child Protective	13:19:00
4		Services?	13:19:04
5	A	No.	13:19:04
R, FSPK 6	Q	Okay. Do you know what The Mandel Company	13:19:12
7		is?	13:19:14
8	A	Yes.	13:19:14
9	Q	And has your work with Mr. Depp involved	13:19:18
10		The Mandel Company?	13:19:20
11	A	Yes.	13:19:21
12	Q	In what way?	13:19:25
13	A	They were his business managers.	13:19:27
14	Q	And the -- Mr. Depp sued The Mandel	13:19:34
15		Company; isn't that correct?	13:19:42
16	A	Yes.	13:19:43
17	Q	What did he sue them for, if you remember?	13:19:45
18	A	Fraud, I believe.	13:19:48
19	Q	And did that lawsuit receive significant	13:19:52
20		media attention?	13:19:59
21	A	I think so.	13:20:00
22	Q	Do you remember it being reported in a	13:20:05

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Transcript of Robin Baum
Conducted on January 20, 2022

47

R,FSPK 1	Rolling Stone article dated June 21, 2018?	13:20:10
2 R,FSPK	A I can't -- I can't -- I don't know if it	13:20:14
3	was or wasn't.	13:20:21
4	Q Do you know -- are you aware that the	13:20:23
5	Mandel lawsuit included aspects of Amber Heard's	13:20:27
6	allegations of violence?	13:20:35
7	MS. HOUCK: Objection --	13:20:36
8	THE WITNESS: No.	13:20:36
9	MS. HOUCK: -- assumes facts.	13:20:37
10	MR. PRESIADO: Lacks foundation, calls for	13:20:39
11	speculation.	13:20:42
12	Q Did you answer, Ms. Baum?	13:20:44
13	A I said "No."	13:20:46
14	Q Did the lawsuit filed by Mr. Depp against	13:20:49
15	Mandel have any impact on Mr. Depp's perception?	13:20:55
16	MR. PRESIADO: Objection; vague and	13:21:01
17	ambiguous.	13:21:04
18	MS. HOUCK: Objection.	13:21:04
19	THE WITNESS: I don't understand the	13:21:07
20	question.	13:21:08
R,FSPK21	Q Did the lawsuit that Mr. Depp filed	13:21:08
22	against The Mandel Company have any impact on	13:21:10

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Transcript of Robin Baum

Conducted on January 20, 2022

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R, FSPK 1	Mr. Depp's public perception?	13:21:13
2	MR. PRESIADO: Same objection.	13:21:16
3	MS. HOUCK: Join.	13:21:19
R, FSPK ₄	THE WITNESS: I don't know.	13:21:19
5	BY MS. PINTADO:	13:21:24
R, FSPK ⁶	Q Okay. Do you -- do you remember fielding	13:21:24
7	media inquiries about the Mandel litigation?	13:21:30
8	A I'm sure I did. I don't remember	13:21:35
9	specifics.	13:21:41
10	Q But generally you remember receiving media	13:21:42
11	inquiries about that?	13:21:46
12	A I don't remember, but... So I guess I'm	13:21:48
13	just assuming, which I shouldn't.	13:21:53
R, FSPK ¹⁴	Q And who is Jacob Bloom?	13:21:55
15	A An attorney.	13:22:02
16	Q And are you aware of the litigation	13:22:03
17	between Mr. Depp and Mr. Bloom?	13:22:10
18	A I'm aware that there was a lawsuit.	13:22:14
19	Q And who filed the lawsuit?	13:22:21
20	A Who filed it?	13:22:22
21	Q Yes. If you know.	13:22:25
22	A I don't know.	13:22:27

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Transcript of Robin Baum
Conducted on January 20, 2022

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1	Q Was Mr. Depp suing Mr. Bloom?	13:22:30
2	A I think -- yeah, I think so.	13:22:34
3	Q What was he suing him for?	13:22:39
4	A I have no --	13:22:41
5	MR. PRESIADO: Objection --	13:22:42
6	THE WITNESS: -- idea.	13:22:43
7	MR. PRESIADO: -- calls for speculation,	13:22:44
8	lacks foundation.	13:22:47
9	Q Did you have to respond to media inquiries	13:22:48
10	about the litigation involving Mr. Bloom?	13:22:50
11	A I can't remember. But I don't believe I	13:22:55
12	responded to anything.	13:23:00
13	Q Okay.	13:23:04
14	MS. PINTADO: Let's pull up Exhibit 5.	13:23:05
15	AV TECHNICIAN: And, Counsel, this is the	13:23:10
16	tech. I just wanted to confirm something. Did	13:23:11
17	you want me to mark this as Exhibit 5 --	13:23:13
18	MS. PINTADO: If you could --	13:23:13
19	AV TECHNICIAN: -- or Exhibit 2?	13:23:15
20	MS. PINTADO: If you could mark the	13:23:15
21	exhibits I'm pulling in order. So this will be, I	13:23:17
22	believe, Exhibit 2.	13:23:24

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CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum

Conducted on January 20, 2022

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1	AV TECHNICIAN: Okay. So the first one	13:23:25
2	would be Exhibit 1?	13:23:26
3	MS. PINTADO: That's correct.	13:23:28
4	AV TECHNICIAN: Okay. Please stand by.	13:23:29
5	MS. PINTADO: Okay.	13:23:31
6	(Exhibit 2, Insider article, was marked	13:23:32
7	for identification and is attached to the	13:23:32
8	transcript.)	13:23:52
9	AV TECHNICIAN: Exhibit 2.	13:23:52
10	BY MS. PINTADO:	13:23:54
11	Q Ms. Baum -- I'll give you control for a	13:23:54
12	moment, Ms. Baum, and if you could just take a	13:24:01
13	look at this, Exhibit 2. You can scroll --	13:24:04
14	A Am I just looking at the headline -- this	13:24:16
15	headline?	13:24:18
16	Q You can scroll through it. Take your	13:24:21
17	time.	13:24:22
18	A It's not scrolling.	13:24:23
19	AV TECHNICIAN: Ms. Baum, if you click	13:24:23
20	your screen.	13:24:25
21	THE WITNESS: Oh.	13:24:25
22	Q You have to click --	13:24:25

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Transcript of Robin Baum
Conducted on January 20, 2022

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1 A No, I did click my screen. Oh, there I 13:24:26
2 go. Okay. 13:24:31

3 Q Okay. And it's a bit of a long one, but I 13:24:42
4 will stop you there. 13:24:45

5 Do you recall seeing this article in 13:24:47
6 Business Insider? 13:24:49

7 A I do not recall seeing this specific 13:24:51
8 article. 13:24:55

9 R,H,FSPK Q Okay. Were there reports that Mr. Depp 13:24:55
10 was drinking heavily and arriving late on the 13:24:59
11 Pirates of the Caribbean 5 -- 13:25:02

12 A Yes. 13:25:04

13 Q -- movie? Yes? And were the reports 13:25:04
14 true, to your knowledge? 13:25:09

15 A I -- I can't answer that. I wasn't there. 13:25:10

16 Q Okay. Were you -- were you doing anything 13:25:12
17 to counter those reports? 13:25:19

18 A I don't believe so. 13:25:21

19 Q Would you say those reports were damaging 13:25:27
20 to Mr. Depp's reputation? 13:25:31

21 A No. 13:25:36

22 Q That he was drinking heavily and arriving 13:25:36

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Transcript of Robin Baum

Conducted on January 20, 2022

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R, H, FSPK	1	late would not have any impact on Mr. Depp's	13:25:42
	2	reputation?	13:25:44
	3	MR. PRESIADO: Objection; asked and	13:25:47
	4	answered.	13:25:51
	5	MS. HOUCK: Join.	13:25:51
R, H, FSPK	6	THE WITNESS: No.	13:25:51
	7	Q Why not?	13:25:52
	8	A Because it -- I think he -- he was often	13:25:55
	9	late.	13:26:01
	10	Q Did he often drink heavily on set?	13:26:05
	11	A I can't answer that.	13:26:08
	12	MR. PRESIADO: Objection; assumes facts	13:26:10
	13	not in evidence, incomplete hypothetical --	13:26:12
	14	Q Did Mr. Depp --	13:26:14
	15	MR. PRESIADO: -- calls for speculation.	13:26:15
R, H, FSPK	16	Q To your knowledge, did Mr. Depp drink	13:26:17
	17	heavily and arrive on any sets?	13:26:21
	18	A I cannot answer that. I've not been on	13:26:30
	19	set with him ever.	13:26:34
	20	Q To your knowledge, did Mr. Depp ever drink	13:26:35
	21	heavily?	13:26:37
	22	A He drank.	13:26:37

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CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum
Conducted on January 20, 2022

53

1 Q Did he drink heavily ever? 13:26:44

2 MR. PRESIADO: Objection; lacks 13:26:48

3 foundation, calls for speculation. 13:26:49

4 MS. HOUCK: Join. And also vague and 13:26:51

5 ambiguous. 13:26:55

VA, FSPK6 Q Did you ever see Mr. Depp drunk? 13:26:55

7 MR. PRESIADO: Objection; calls for 13:27:04

8 speculation, lacks foundation. 13:27:05

9 Q You can answer. 13:27:07

VA, FSPK10 A I -- I -- it depends how you -- what your 13:27:09

11 interpretation of "drunk" was. But I -- I 13:27:29

12 definitely -- he -- saw him drink. 13:27:32

13 Q Did you ever see Mr. Depp consume drugs 13:27:37

R 14 other than alcohol? 13:27:41

15 A No. 13:27:43

VA, FSPK16 F/A MS. PINTADO: Let's pull up Exhibit 6. 13:27:49

17 (Exhibit 3, E-mail dated 9/4/2015, Bates 13:28:14

18 No. BAUM000990, was marked for identification and 13:28:14

19 is attached to the transcript.) 13:28:17

20 AV TECHNICIAN: Exhibit 3. 13:28:17

21 Q And -- yeah. I'll let you scroll down, 13:28:18

22 Ms. Baum. 13:28:20

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CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum

Conducted on January 20, 2022

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1 MS. HOUCK: And, Robin, each time counsel 13:28:25
2 shows you a document, feel free to read the entire 13:28:27
3 thing. Take your time. 13:28:29
4 THE WITNESS: I'm -- does it -- it doesn't 13:28:36
5 scroll down. Does it -- I mean, does it end at -- 13:28:39
6 Q It's a one-page document. 13:28:42
7 A Oh, okay. 13:28:43

H, F/A 8 Q Do you recognize this document, Ms. Baum? 13:28:45
9 A I recognize that it's from me to Tracey 13:28:47
10 Jacobs. 13:28:55
11 Q Okay. And scrolling to the bottom, Tracey 13:28:55
12 Jacobs writes: If you have to break down the 13:29:05
13 door, just get him there on time. X. 13:29:06
14 Is that correct? Do you see that? 13:29:11
15 A Yes. She wrote that to me first. 13:29:12
16 Q Okay. And you respond: Ha. He's in 13:29:15
17 makeup now, that's good. 13:29:19
18 Correct? 13:29:20
19 A Yeah. He was in makeup. 13:29:21
20 Q And then Tracey Jacobs writes: Are he and 13:29:23
21 Amber fighting? 13:29:29
22 Do you see that? 13:29:30

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Transcript of Robin Baum
Conducted on January 20, 2022

55

1	A Yeah.	13:29:31
2	Q And you said, They are good, not fighting.	13:29:34
3	And they had an early night.	13:29:37
4	Do you see that?	13:29:38
5	A Yeah.	13:29:39
6	Q And you said that Mr. Depp was late	13:29:44
7	frequently to his engagements, correct?	13:29:46
8	MS. HOUCK: Objection; misstates prior	13:29:49
9	testimony.	13:29:50
10	MR. PRESIADO: Join.	13:29:52
11	THE WITNESS: I don't know if I used the	13:29:55
12	word "frequently."	13:29:56
13	Q You said --	13:29:58
14	A I said --	13:29:58
15	Q -- "often." I'm sorry.	13:29:58
16	A Right.	13:30:00
17	Q So he was late often to his engagements;	13:30:01
18	is that correct?	13:30:05
19	A (Nonverbal response.)	13:30:06
20	Q How late was --	13:30:11
21	A It's correct -- it's correct to say that	13:30:12
22	he's -- he's been -- he's late to things.	13:30:14

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Transcript of Robin Baum

Conducted on January 20, 2022

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1 Q And just as a reminder, when you're -- try 13:30:17

2 to verbalize instead of nod your head. 13:30:22

3 A Sorry. 13:30:24

4 Q That's okay. 13:30:26

R, FSPK 5 How late is Mr. Depp? 13:30:27

6 MS. HOUCK: Objection; vague and 13:30:32

7 ambiguous. 13:30:34

8 MR. PRESIADO: Join. 13:30:34

9 THE WITNESS: Is there a time frame? 13:30:37

R, FSPK 10 Q During the time of this e-mail, let's 13:30:39

11 say -- 13:30:52

12 A I can't -- I don't remember -- I don't 13:30:52

13 remember what -- or where we were in September of 13:30:54

14 2015, so hard to -- hard to -- to answer that 13:30:57

15 question around this specific time. I mean, I see 13:31:06

16 the e-mail... 13:31:09

17 Q Have you ever known Mr. Depp to be 13:31:10

18 30 minutes late to an event? 13:31:12

19 A Yes. 13:31:14

20 Q Have you ever known Mr. Depp to be an hour 13:31:16

21 late? 13:31:20

22 A Yes. 13:31:22

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Transcript of Robin Baum
Conducted on January 20, 2022

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1	Q Have you ever known Mr. Depp to be up to	13:31:24
2	two hours late?	13:31:28
3	A Not without warning.	13:31:29
4	Q Okay. And did that affect how you were	13:31:43
5	able to schedule his press conferences or other	13:31:47
6	engagements?	13:31:50
7	MR. PRESIADO: Objection; vague and	13:31:54
8	ambiguous.	13:31:55
9	MS. HOUCK: Join.	13:31:55
10	THE WITNESS: No, it did not affect how I	13:31:56
11	arranged anything, no. You did ask me that?	13:32:10
12	Q Yeah. You didn't have to change speaking	13:32:21
13	engagements when he was an hour late?	13:32:24
14	MS. HOUCK: Objection; vague and	13:32:27
15	ambiguous.	13:32:30
16	MR. PRESIADO: And assumes facts not in	13:32:30
17	evidence.	13:32:36
18	THE WITNESS: I had to let people know he	13:32:36
19	was running late.	13:32:40
20	Q And were you aware of any delays in	13:32:41
21	Mr. Depp's filming schedule because of his	13:32:45
22	lateness?	13:32:48

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Transcript of Robin Baum

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1 MR. PRESIADO: Objection; lacks 13:32:50
2 foundation, calls for speculation. 13:32:52
3 MS. HOUCK: Join. 13:32:53
4 THE WITNESS: No. I was not -- I'm not 13:32:55
5 aware of anything that happened during production 13:32:58
6 unless I read it in the press that you just showed 13:33:02
7 me. 13:33:05
8 BY MS. PINTADO: 13:33:05

FSPK 9 Q Okay. And did Mr. Depp and Ms. Heard 13:33:05
10 fight often? 13:33:21

11 MR. PRESIADO: Objection; lacks 13:33:25
12 foundation, calls for speculation -- 13:33:27
13 MS. HOUCK: Join. 13:33:28
14 MR. PRESIADO: -- and vague and ambiguous. 13:33:33

FSPK 15 THE WITNESS: I wasn't with them a ton, 13:33:37
16 together, so I -- I don't -- I don't -- I don't 13:33:52
17 know if "often" is the right word. 13:34:04
18 Q How often were you with them together? 13:34:08
19 A If we were -- if she traveled with us on a 13:34:10
20 press tour or went to an event with him. 13:34:18
21 Q Did you ever witness Amber and Mr. Depp 13:34:25
22 fighting on a press tour? 13:34:28

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Transcript of Robin Baum
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1 MR. PRESIADO: Objection; vague and 13:34:31

2 ambiguous. 13:34:32

3 MS. HOUCK: Join. 13:34:32

4 THE WITNESS: Not visually. 13:34:38

5 BY MS. PINTADO: 13:34:48

6 Q What do you mean by that? 13:34:48

FSPK 7 A They had -- I heard -- I overheard a phone 13:34:49

8 argument with them once. 13:34:54

9 Q When was that? 13:34:56

10 A At the Toronto film festival. 13:35:00

11 Q Were you with them at the Toronto film 13:35:10

12 festival? 13:35:18

13 A Well, I was with -- I was there for 13:35:18

14 Johnny, and she was there. 13:35:24

15 Q Okay. And that was around July 8, 2014? 13:35:25

16 A Not July, no. September. And I don't 13:35:30

17 know the year. 13:35:35

18 Q Do you ever recall any other instance of 13:35:42

19 them fighting on that occasion? 13:35:46

20 MS. HOUCK: Objection; vague and 13:35:50

21 ambiguous. 13:35:52

22 MR. PRESIADO: Also assumes facts not in 13:35:52

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Transcript of Robin Baum

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1	evidence, misstates testimony.	13:35:56
2	THE WITNESS: I'm not aware of any other	13:35:58
3	fight.	13:36:06
4	BY MS. PINTADO:	13:36:07
5	Q What happened on the phone, that you could	13:36:07
6	hear?	13:36:09
7	A Johnny was asked by the head of marketing	13:36:10
8	at the studio to not attend her premiere, which	13:36:16
9	was the night before his premiere, because they	13:36:21
10	wanted him -- they wanted to save his red carpet	13:36:24
11	moment.	13:36:28
12	So he called her -- she was in another	13:36:29
13	room doing hair and makeup, and he called her to	13:36:32
14	explain the situation, and she was not happy.	13:36:38
15	Q What do you mean, "save his red carpet	13:36:43
16	moment"?	13:36:49
17	A They wanted his first red carpet moment to	13:36:49
18	be his premiere, not at her premiere as a guest.	13:36:52
19	Q Why is that?	13:36:56
20	MR. PRESIADO: Objection; calls for	13:36:59
21	speculation.	13:36:59
22	(Simultaneous crosstalk.)	13:37:01

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Transcript of Robin Baum
Conducted on January 20, 2022

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1	MS. HOUCK: Join.	13:37:01
2	THE WITNESS: Because Johnny's appearance	13:37:07
3	on a red carpet is a big moment.	13:37:08
4	BY MS. PINTADO:	13:37:17
5	Q And why couldn't he appear at her film	13:37:17
6	premiere on the red carpet as opposed to his film	13:37:20
7	premiere first?	13:37:24
8	MR. PRESIADO: Objection; misstates	13:37:25
9	testimony, calls for speculation, lacks	13:37:26
10	foundation.	13:37:31
11	MS. HOUCK: Join.	13:37:32
12	THE WITNESS: Well, I can't answer that.	13:37:34
13	You'd have to ask the marketing person why they	13:37:35
14	asked him to do that.	13:37:38
15	Q What else did you hear on the phone?	13:37:39
16	A Well, I didn't hear specifics. I know she	13:37:43
17	was upset and angry, so he ended up going to her	13:37:49
18	premiere.	13:37:55
19	Q What -- where were you? Were you in the	13:37:56
20	same room as Mr. Depp?	13:38:01
21	A Yes.	13:38:02
22	Q And where was Amber?	13:38:03

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Transcript of Robin Baum

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1	MS. HOUCK: Objection; calls for	13:38:08
2	speculation, lacks personal knowledge.	13:38:10
3	THE WITNESS: Well, she -- she wasn't in	13:38:12
4	the room. She was in a different room.	13:38:15
5	Q Why were they in different rooms?	13:38:17
6	A She was doing hair and makeup in the hair	13:38:19
7	and makeup room.	13:38:22
8	Q Okay. And do you recall a time when you	13:38:24
9	were waiting for Mr. Depp and Amber outside of	13:38:29
10	their hotel room?	13:38:33
11	MR. PRESIADO: Objection; vague and	13:38:38
12	ambiguous.	13:38:39
13	THE WITNESS: I'm sorry, I -- I -- was	13:38:39
14	that a full question?	13:38:42
15	Q Do you recall a time when you were waiting	13:38:44
16	for Mr. Depp and Amber outside of their hotel room	13:38:46
17	because they were running late to the premiere --	13:38:50
18	or to the -- sorry, excuse me, to the film	13:38:53
19	festival?	13:39:00
20	MS. HOUCK: Objection; vague and	13:39:00
21	ambiguous. Are we still talking about the Toronto	13:39:01
22	film festival?	13:39:04

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1 MS. PINTADO: Yes. 13:39:05

2 THE WITNESS: I don't -- I don't remember 13:39:11

3 specifics, and I don't believe I was waiting 13:39:13

4 outside. I believe I was in the room. 13:39:15

5 BY MS. PINTADO: 13:39:17

H,FSPK 6 Q Okay. Do you ever remember hearing 13:39:17

7 Mr. Depp and Amber fighting through a hotel room 13:39:26

8 door while you were in a hallway? 13:39:31

9 A At any time or at this particular -- 13:39:33

10 Q At any time. 13:39:43

H,FSPK 11 A I -- I don't remember hearing them fight 13:39:52

12 through a hotel room. But I remember being told 13:39:55

13 that they had a fight. 13:39:59

14 Q Okay. And who were you told by? 13:40:01

15 A I believe Jerry Judge, his security. 13:40:06

16 Q What did Jerry Judge tell you? 13:40:13

17 MR. PRESIADO: Objection; hearsay. 13:40:17

H,FSPK 18 THE WITNESS: I -- I can't -- I mean, it 13:40:20

19 was so long ago, I could not tell you exactly word 13:40:22

20 by word what he told me other than the fact that 13:40:25

21 they were in a fight and it was delaying him. 13:40:27

22 Q So back to Toronto, was Jody Gottlieb 13:40:29

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Transcript of Robin Baum

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1	there as well?	13:40:40
2	MS. HOUCK: Objection; assume facts. I'm	13:40:42
3	not sure that -- objection; assume facts.	13:40:44
4	THE WITNESS: Jody Gottlieb was in	13:40:49
5	Toronto.	13:40:53
6	Q And did you ever witness Mr. Depp raising	13:40:54
7	his voice at Ms. Gottlieb when you were in	13:41:00
8	Toronto?	13:41:03
9	A He -- she -- well, I -- you have to define	13:41:03
10	raise your voice. But, yes, he -- well, no. He	13:41:18
11	asked her -- she was trying to rush him along, and	13:41:21
12	he said he wasn't ready.	13:41:24
13	Q And he didn't raise his voice at all?	13:41:26
14	MR. PRESIADO: Objection; misstates	13:41:31
15	testimony, assumes facts not in evidence.	13:41:32
16	MS. HOUCK: Join.	13:41:36
17	THE WITNESS: Well, he was saying it from	13:41:41
18	one room, a closed door, to another room. So,	13:41:45
19	yes, it was probably louder than if he was	13:41:49
20	speaking to somebody in person.	13:41:50
21	Q Did he exit the hotel room?	13:41:51
22	A Well, yes. We went to the premiere.	13:41:53

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Transcript of Robin Baum
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1	Q	So you were waiting outside of his hotel	13:42:01
2		room?	13:42:04
3	A	I was in the hotel room.	13:42:05
4	Q	You were in the hotel room with him?	13:42:07
5	A	Yes.	13:42:08
6	Q	And when you and Mr. Depp exited the hotel	13:42:10
7		room together, was Ms. Gottlieb there, waiting in	13:42:15
8		the hallway?	13:42:19
9	A	I -- sorry, say that again.	13:42:19
10	Q	You exited the hotel room at some point to	13:42:25
11		go to the festival. Was Ms. Gottlieb there when	13:42:27
12		you exited the hotel room? Was she standing --	13:42:33
13	A	I think so.	13:42:39
14	Q	-- in the hallway?	13:42:40
15	A	I think so.	13:42:41
16	Q	Was anyone else there?	13:42:42
SP 17	A	I can't be specific about who was there,	13:42:45
18		but -- I mean, I can't be specific. I don't	13:42:51
19		remember who exactly was there, but we -- you	13:42:57
20		know, there were assistants and security, so who	13:42:58
21		specific, I don't know.	13:43:03
22	Q	Okay. And Mr. Depp raised his voice	13:43:04

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Transcript of Robin Baum

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1	through the door. And did he continue any	13:43:07
2	conversation with Ms. Gottlieb after he exited?	13:43:12
3	MR. PRESIADO: Objection; misstates	13:43:15
4	testimony.	13:43:21
5	THE WITNESS: I don't -- I don't recall.	13:43:21
6	Q Do you remember being in Venice -- you	13:43:23
7	mentioned Venice earlier -- the Venice Film	13:43:27
8	Festival?	13:43:33
9	A Well, I've been at the Venice Film	13:43:33
10	Festival with Johnny on numerous occasions.	13:43:36
11	Q Okay. On any of those occasions, do you	13:43:40
12	remember Mr. Depp and Amber fighting?	13:43:43
13	A No, I don't -- I don't know -- I cannot	13:43:49
14	recall anything specific.	13:44:03
15	MS. PINTADO: Okay. We've been going over	13:44:10
16	an hour now, so let's take a ten-minute break.	13:44:11
17	THE WITNESS: Okay. Thank you.	13:44:14
18	THE VIDEOGRAPHER: Off the record at 1:44.	13:44:15
19	(Recess was held.)	13:55:29
20	THE VIDEOGRAPHER: Back on the record at	13:55:29
21	1:56.	13:56:12
22	BY MS. PINTADO:	13:56:13

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Transcript of Robin Baum

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1	Q Okay. Let's pull up Exhibit 7, that's	13:56:14
2	been marked as Exhibit 7 previously.	13:56:18
3	AV TECHNICIAN: Please stand by. Counsel,	13:56:21
4	I do not see a sticker on Exhibit 7. Would you	13:56:33
5	like me to mark it for this deposition?	13:56:37
6	MS. PINTADO: Yes. It's in the stack as	13:56:41
7	Exhibit 7, I should say. And you can mark this in	13:56:45
8	sequence. I believe it's Exhibit 3 now.	13:56:48
9	AV TECHNICIAN: This will be Exhibit 4.	13:56:50
10	MS. PINTADO: Okay.	13:56:53
11	(Exhibit 4, Wootton Article, was marked	13:56:54
12	for identification and is attached to the	13:56:54
13	transcript.)	13:56:54
14	BY MS. PINTADO:	13:56:55
15	Q And, Ms. Baum, I'll give you a second to	13:56:55
16	scroll through this.	13:57:06
17	A Is this just one page or multiple?	13:57:09
18	Q This is multiple pages.	13:57:11
19	A Okay.	13:57:13
20	MS. HOUCK: It looks like an 11-page	13:57:19
21	document.	13:57:21
22	THE WITNESS: Okay. I think -- am I done?	13:59:34

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Transcript of Robin Baum

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1	Q Yes, I believe so.	13:59:36
2	Ms. Baum, have you seen this document	13:59:38
3	before?	13:59:41
4	A I have not.	13:59:41
5	Q Have you seen this article before,	13:59:42
6	published anywhere?	13:59:46
7	MR. PRESIADO: Objection; lacks	13:59:52
8	foundation, if it's an article or if it -- where	13:59:53
9	it was published.	14:00:00
10	THE WITNESS: I don't -- yeah, I don't	14:00:01
11	believe I've seen it in this format.	14:00:03
12	Q Have you seen an article by Dan Wootton	14:00:05
13	published in The Sun?	14:00:07
14	A Yes.	14:00:11
15	Q Okay. And did that article include	14:00:12
16	accusations by Amber Heard of domestic violence by	14:00:19
17	Mr. Depp?	14:00:27
18	MR. PRESIADO: Objection; vague and	14:00:27
19	ambiguous as to what article.	14:00:28
20	Q The article that you have seen published	14:00:38
21	by -- in The Sun by Dan Wootton.	14:00:39
22	A And the question is: Did it include --	14:00:46

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Transcript of Robin Baum
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1	Q Accusations by Amber of domestic	14:00:50
2	violence --	14:00:50
3	MR. PRESIADO: Objection; vague --	14:00:57
4	Q -- by Mr. Depp.	14:00:55
5	MR. PRESIADO: Objection; vague and	14:00:57
6	ambiguous.	14:01:00
7	MS. HOUCK: Join.	14:01:01
8	Q I apologize for the noise.	14:01:02
9	A So you're asking me: Did this -- did an	14:01:16
10	article by Dan Wootton run in The Sun, that	14:01:19
11	included accusations that Amber made --	14:01:22
12	Q Yes.	14:01:27
13	A -- against Johnny?	14:01:28
14	Q Yes.	14:01:32
VA, FSPK 15	A Yes.	14:01:33
VA, FSPK 16	Q Thank you. And you remember seeing that	14:01:34
17	article?	14:01:39
18	A Yes.	14:01:40
19	Q And did that article have any impact on	14:01:44
20	Mr. Depp's reputation or career?	14:01:53
21	MR. PRESIADO: Objection to the extent it	14:02:01
22	calls for expert testimony. Objection to the	14:02:02

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1	extent it lacks foundation, calls for speculation.	14:02:06
2	MS. HOUCK: And I'll join those objections	14:02:10
3	and add that it's vague and ambiguous.	14:02:12
4	BY MS. PINTADO:	14:02:16
5	Q You can answer, Ms. Baum.	14:02:16
6	A You're asking me my opinion or -- or -- or	14:02:18
7	whose opinion?	14:02:29
8	Q Your opinion.	14:02:30
9	A What, my opinion?	14:02:32
10	Q Yes.	14:02:34
11	A Do I think that that article damaged	14:02:35
12	Johnny's career?	14:02:39
13	Q Yes.	14:02:41
14	A Is that the question?	14:02:43
15	Q Yes.	14:02:44
16	A Yes. I believe calling him a "wife	14:02:45
17	beater" damaged him.	14:02:47
18	Q Would you say that that article calling	14:02:49
19	him a "wife beater" was negative press?	14:02:55
20	A Yes.	14:02:58
21	Q How did you respond to it, if at all, as a	14:03:01
22	publicist?	14:03:13

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VA, FSPK1	A I did not re- -- I don't recall -- recall	14:03:15
2	responding to it. I'm sure that the lawyers	14:03:20
3	advised.	14:03:23
4	Q Why wouldn't you respond to it?	14:03:26
5	A I don't always -- I don't respond to a lot	14:03:30
6	of stories. I -- I can't -- I honestly can't	14:03:45
7	recall the details of what happened when this	14:03:50
8	article came out. I don't -- I don't remember the	14:03:54
9	events.	14:03:59
10	Q Wouldn't a counter story at this point	14:03:59
11	have prevented any damage to Mr. Depp's	14:04:07
12	reputation?	14:04:11
13	MR. PRESIADO: Objection; calls --	14:04:12
14	MS. HOUCK: Objection.	14:04:13
15	MR. PRESIADO: -- calls for speculation,	14:04:13
16	lacks foundation, assumes facts not in evidence.	14:04:15
17	MS. HOUCK: Yes. And join.	14:04:20
18	MR. PRESIADO: And vague and ambiguous.	14:04:21
19	Q You can still answer, Ms. Baum.	14:04:31
20	A Would you -- I'm sorry, would you, then,	14:04:33
21	repeat the question.	14:04:33
22	MS. PINTADO: Can you read it back,	14:04:35

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1 please. 14:04:36

2 (The court reporter read the pertinent 14:05:00

3 part of the record.) 14:05:01

4 MR. PRESIADO: Same objections. 14:05:01

5 MS. HOUCK: Join. 14:05:04

VA, FSPK 6 THE WITNESS: Well, just to say again, I 14:05:05

7 don't recall what we did or did not do after this 14:05:07

8 article came out. But, no, not -- responding 14:05:10

9 doesn't always change the course of the effect of 14:05:13

10 an article. 14:05:21

11 BY MS. PINTADO: 14:05:22

VA, FSPK 12 Q What -- and what strategy -- what strategy 14:05:22

13 did you have as a publicist after this article 14:05:32

14 came out? 14:05:34

15 MR. PRESIADO: Objection; lacks 14:05:35

16 foundation, calls for speculation. 14:05:38

17 MS. HOUCK: Join. 14:05:39

VA, FSPK 18 THE WITNESS: I just said I don't recall. 14:05:39

19 Q Okay. 14:05:41

20 MS. PINTADO: Let's look at Exhibit 8 -- 14:05:46

21 scratch that. 14:05:57

22 Let's look at what's marked in the stack 14:05:59

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1	as Exhibit 9.	14:06:00
2	AV TECHNICIAN: Stand by.	14:06:02
3	MS. HOUCK: Is that going to be	14:06:07
4	Exhibit 3 -- or -- I'm sorry -- Exhibit 4 --	14:06:08
5	AV TECHNICIAN: I'm sorry, Counsel, this	14:06:11
6	will be Exhibit 5.	14:06:13
7	(Exhibit 5, Rolling Stone article, was	14:06:20
8	marked for identification and is attached to the	14:06:20
9	transcript.)	14:06:20
10	THE WITNESS: Is this just one page?	14:06:31
11	BY MS. PINTADO:	14:06:31
12	Q No, it's multiple pages. But we can just	14:06:33
13	stay on the first page, if that's okay.	14:06:36
14	A Yup.	14:06:38
15	MS. HOUCK: It's a 35-page document.	14:06:40
F/A 16	Q Do you remember this Rolling Stone article	14:06:44
17	that was published on June 21, 2019?	14:06:45
18	A Yes.	14:06:51
19	Q Sorry, that's 2018.	14:06:51
20	A June 21, 2018, yes.	14:06:55
21	Q And what do you remember about it?	14:06:57
22	A What specifically are you asking?	14:06:59

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F/A	1	Q Do you remember what it was about?	14:07:07
	2	A Generally, yes.	14:07:09
	3	Q Can you tell me.	14:07:15
	4	A It was about the writer's encounter with	14:07:18
	5	Johnny.	14:07:33
	6	Q Okay. And do you remember anything else	14:07:34
	7	about the writer's encounter with Johnny?	14:07:35
	8	A I did not set this up. I had no contact	14:07:37
	9	with the writer.	14:07:41
	10	Q Okay. Did you -- do you remember anything	14:07:42
	11	else about what the article says? And we can	14:07:49
	12	scroll down if that helps you.	14:07:50
	13	A I would have to reread the article --	14:07:51
	14	MR. PRESIADO: Yeah. Objection --	14:07:54
	15	THE WITNESS: -- to be very specific.	14:07:55
	16	MR. PRESIADO: -- the document speaks for	14:07:57
	17	itself.	14:07:58
F/A	18	Q Would you agree that Rolling Stone has a	14:07:58
	19	large readership?	14:08:01
	20	MR. PRESIADO: Objection; vague and	14:08:03
	21	ambiguous.	14:08:06
	22	MS. HOUCK: Join.	14:08:06

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Transcript of Robin Baum
Conducted on January 20, 2022

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R, FSPK	1	THE WITNESS: I don't know what the	14:08:07
	2	readership is.	14:08:08
	3	BY MS. PINTADO:	14:08:09
R, FSPK	4	Q You're a publicist, and you don't know	14:08:09
	5	what the readership is for Rolling Stone?	14:08:15
	6	A No --	14:08:18
	7	MR. PRESIADO: Objection; asked and	14:08:19
	8	answered.	14:08:20
	9	THE WITNESS: -- I do not know the	14:08:20
	10	numbers.	14:08:21
R, FSPK	11	Q Do you have an approximation?	14:08:21
	12	A Nope. I know it's a national magazine.	14:08:23
	13	Q Okay. Is it a global magazine?	14:08:29
	14	A There are other Rolling Stone editions in	14:08:32
	15	other territories, but this is a U.S.-based	14:08:39
	16	magazine.	14:08:42
	17	Q Okay. And it's published online as well	14:08:44
	18	as throughout the United States?	14:08:47
	19	A I believe so.	14:08:48
	20	Q And are you aware that this Rolling Stone	14:08:53
	21	article published some of the details of Amber's	14:08:59
	22	allegations of abuse by Johnny Depp?	14:09:03

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Transcript of Robin Baum

Conducted on January 20, 2022

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1	MR. PRESIADO: Objection; the document	14:09:07
2	speaks for itself, calls for speculation, lacks	14:09:08
3	foundation.	14:09:10
4	MS. HOUCK: Join.	14:09:11
5	THE WITNESS: I don't know -- I don't	14:09:13
6	remember specifically what is in the article. I'd	14:09:15
7	have to reread it.	14:09:20
8	BY MS. PINTADO:	14:09:21
9	Q All right. I'll give you a -- let's see.	14:09:21
10	Let's go to page 2. Here -- if I can take control	14:09:25
11	really quick.	14:09:32
12	A Okay.	14:09:35
H 13	Q It says here: Depp sits at the head of	14:09:36
14	the table and the -- and motions towards some	14:09:54
15	rolling papers and two equal piles of tobacco and	14:09:58
16	hash, and asks if I mind. I don't. He pauses for	14:10:02
17	a second. "Well, let's drink some wine first."	14:10:06
18	Would publish-- -- would publication of	14:10:09
19	this statement affect Mr. Depp's reputation?	14:10:13
20	MR. PRESIADO: Objection; calls for	14:10:15
21	speculation, lacks foundation. Objection to the	14:10:16
22	extent it calls for expert testimony.	14:10:19

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Transcript of Robin Baum
Conducted on January 20, 2022

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1 MS. HOUCK: Join. 14:10:22

2 THE WITNESS: So just to clarify, you're 14:10:22

3 asking me if that sentence -- I guess ask me again 14:10:26

4 the question. 14:10:34

5 BY MS. PINTADO: 14:10:35

FSPK,H 6 Q Would this sentence that I read -- did 14:10:35

7 that have any impact on Mr. Depp's reputation? 14:10:40

8 MR. PRESIADO: Same objections. 14:10:43

9 MS. HOUCK: Join. 14:10:45

FSPK,H 10 THE WITNESS: Well, I can only speak for 14:10:46

11 my opinion. And I do not think so. 14:10:47

12 Q Why not? 14:10:52

FSPK,H 13 A I don't -- I think -- I don't think people 14:10:53

14 would be surprised that he would want to drink 14:11:04

15 wine and smoke a cigarette. 14:11:07

16 Q It says that there's piles of hash as 14:11:09

17 well, or at least "two equal piles of tobacco and 14:11:16

18 hash." And that wouldn't be surprising either? 14:11:20

19 MR. PRESIADO: Objection; vague and 14:11:22

20 ambiguous. 14:11:27

21 MS. HOUCK: And calls for speculation. 14:11:27

22 THE WITNESS: I can't -- I don't -- I 14:11:28

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Transcript of Robin Baum

Conducted on January 20, 2022

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1 can't answer that. But I -- I don't think that 14:11:30

R, FSPK 2 that's -- I don't think that sentence has any 14:11:34

3 negative effect. 14:11:37

4 BY MS. PINTADO: 14:11:40

R, FSPK 5 Q Because Mr. Depp already had a reputation 14:11:40

6 for those things; is that correct? 14:11:42

7 MR. PRESIADO: Objection; argumentative, 14:11:44

8 assumes facts not in evidence. 14:11:48

9 MS. HOUCK: Lacks foundation. Join. 14:11:52

10 Q You can answer, Ms. Baum. 14:11:57

R, FSPK 11 A I would say people would assume that he 14:11:59

12 drank and smoked. 14:12:03

13 Q And below that it says -- if you could 14:12:08

14 just read this paragraph to yourself, starting 14:12:11

15 with, It had taken. 14:12:15

16 A Okay. One sec. 14:12:17

17 MS. HOUCK: We're on page 2 of Exhibit 5, 14:12:23

18 starting with the bold, It had taken. 14:12:25

19 THE WITNESS: Uh-huh. 14:12:29

20 Okay. 14:13:03

21 Q Okay. And did this paragraph have any 14:13:03

22 impact on Mr. Depp's career and reputation? 14:13:05

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Transcript of Robin Baum
Conducted on January 20, 2022

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1	MR. PRESIADO: Objection; vague and	14:13:09
2	ambiguous, calls for speculation, lacks	14:13:11
3	foundation.	14:13:13
4	MS. HOUCK: Join.	14:13:15
5	THE WITNESS: Once again, I'm only -- I'm	14:13:20
6	only -- can only answer for myself or speak for	14:13:22
7	myself. I -- what --	14:13:24
8	I'm sorry, I just want to hear the	14:13:35
9	question one more time.	14:13:36
10	MS. PINTADO: Can you read back, please.	14:13:37
11	(The court reporter read the pertinent	14:13:53
12	part of the record.)	14:13:53
13	MR. PRESIADO: Same objection.	14:13:53
14	THE WITNESS: Speaking for myself, I do --	14:13:58
15	I do not think it had any damage to his	14:13:59
16	reputation.	14:14:01
17	BY MS. PINTADO:	14:14:02
18	Q Why is that? Why didn't it?	14:14:02
19	A Because he's -- he's suing for something	14:14:06
20	that he thinks he or -- he was wronged.	14:14:11
21	Q And isn't it also saying -- strike that.	14:14:16
22	Let's go to page 3 of this document.	14:14:22

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Transcript of Robin Baum

Conducted on January 20, 2022

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1 A Am I reading this: Over --

14:14:39

2 Okay.

14:14:40

R, FSPK³

Q Well, let's look at this sentence right

14:14:41

4 here. It says, Over the past 18 months, there has

14:14:44

5 been little but bad news for Depp. In addition to

14:14:47

6 the financial woes, there were -- there were

14:14:51

7 reports he couldn't remember his lines and had to

14:14:52

8 have them fed through an ear pick -- earpiece.

14:14:55

9 Was it negative publicity to report on

14:15:01

10 Mr. Depp's financial woes?

14:15:05

11 MR. PRESIADO: Objection; vague and

14:15:10

12 ambiguous, assumes facts not in evidence.

14:15:12

13 MS. HOUCK: Join.

14:15:16

R, FSPK¹

14 THE WITNESS: I don't see that as being

14:15:19

15 negative, no.

14:15:21

16 Q Was it negative publicity that there were

14:15:22

17 reports that Mr. Depp could not remember his lines

14:15:30

18 and had to have them fed through an earpiece?

14:15:33

19 MR. PRESIADO: Objection; vague and

14:15:41

20 ambiguous.

14:15:48

21 Q You can answer, Ms. Baum.

14:15:50

R, FSPK²²

A Well, that's the writer's assumption of

14:15:51

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Transcript of Robin Baum
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H, FSPK	1	why he wore an earpiece. And, no, I don't	14:15:55
	2	think -- I don't think it had any negative	14:16:01
	3	consequences.	14:16:03
	4	Q As an actor it didn't have any negative	14:16:04
	5	consequences to have a report saying that he was	14:16:09
	6	having lines fed to him?	14:16:12
	7	MR. PRESIADO: Objection; asked and	14:16:15
	8	answered.	14:16:16
	9	MS. HOUCK: Also argumentative.	14:16:16
H, FSPK	10	THE WITNESS: That's the writer's	14:16:20
	11	assumption. That's not confirmed or told from --	14:16:23
	12	that I can read, that's not something that	14:16:30
	13	Mr. Depp has said.	14:16:32
	14	Q Were there reports that Mr. Depp was	14:16:36
	15	having his lines fed to him through an earpiece?	14:16:39
	16	MR. PRESIADO: Objection; calls for	14:16:43
	17	speculation, lacks foundation.	14:16:44
	18	MS. HOUCK: Join.	14:16:45
H, FSPK	19	Q You're Mr. Depp's publicist, so you would	14:16:46
	20	know if there were reports that --	14:16:51
	21	A Well, I can't remember. I don't remember	14:16:54
	22	if there was anything more than this piece.	14:16:55

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Transcript of Robin Baum

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1	Q And isn't this -- doesn't this piece	14:16:59
2	reflect negatively on him?	14:17:04
3	MS. HOUCK: Objection; vague and	14:17:08
4	ambiguous.	14:17:13
5	MR. PRESIADO: Join.	14:17:13
6	THE WITNESS: Are you -- sorry.	14:17:13
7	Are you asking as a whole? Are you asking	14:17:18
8	as a whole entire piece? Are you asking about	14:17:21
9	specific parts of it?	14:17:24
10	Q I'm asking about this specific part. Was	14:17:25
11	it a positive that he was having reports about him	14:17:29
12	regarding lines being fed to him through an	14:17:34
13	earpiece?	14:17:37
14	MR. PRESIADO: Objection --	14:17:39
15	MS. HOUCK: Objection; lacks --	14:17:39
16	MR. PRESIADO: -- vague and ambiguous,	14:17:41
17	assumes facts not in evidence, calls for	14:17:43
18	speculation, lacks foundation.	14:17:46
19	MS. HOUCK: Join.	14:17:47
20	THE WITNESS: I would say that's probably	14:17:51
21	a better question to ask his agents.	14:17:52
22	Q But I'm asking you.	14:17:56

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Transcript of Robin Baum
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1	A I don't see it as a negative. I don't --	14:17:57
2	I see this as a hear- -- as hearsay. I don't see	14:18:00
3	this as someone reporting any concrete truth.	14:18:03
4	Q But isn't a lot of what's put out in the	14:18:08
5	media hearsay?	14:18:13
6	MR. PRESIADO: Objection --	14:18:17
7	Q And if it --	14:18:18
8	MR. PRESIADO: -- vague and ambiguous,	14:18:19
9	calls for speculation, lacks foundation.	14:18:20
10	THE WITNESS: I don't think that the line	14:18:25
11	that you're asking me to read is -- is -- hurts	14:18:27
12	him, is negative.	14:18:31
13	Q Okay. Do you know how -- did Mr. Depp	14:18:33
14	ever express to you how he felt about this	14:18:42
15	article?	14:18:44
16	A I don't believe we ever discussed it, me	14:18:45
17	and him.	14:18:58
18	Q Are you aware of how Mr. Depp felt about	14:18:59
19	this article?	14:19:02
20	MR. PRESIADO: Objection; calls for	14:19:06
21	hearsay, calls for speculation.	14:19:08
22	THE WITNESS: I don't recall, so I -- I'm	14:19:10

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Transcript of Robin Baum

Conducted on January 20, 2022

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1 not going to answer.

14:19:12

H, FSPK

2 Q Do you think overall this article was

14:19:13

3 positive about Mr. Depp?

14:19:18

4 MR. PRESIADO: Objection; asked and

14:19:22

5 answered.

14:19:24

6 THE WITNESS: I do not think it's

14:19:24

7 positive.

14:19:26

H, FSPK

8 Q Would you say this article is generally

14:19:26

9 negative about Mr. Depp?

14:19:31

10 MR. PRESIADO: Objection; vague and

14:19:33

11 ambiguous.

14:19:36

12 Q Is this negative --

14:19:36

13 A Can I --

14:19:37

14 Q -- publicity?

14:19:39

15 You can take a look at --

14:19:39

16 A Can we go back up to the headline.

14:19:40

17 Q Yes. I believe you have -- oh, I have

14:19:42

18 control still. There you go.

14:19:47

19 MS. HOUCK: There is a question pending.

14:19:49

20 May I ask Madam Court Reporter to reread it,

14:19:50

21 please.

14:19:52

22 (The court reporter read the pertinent

14:19:52

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Transcript of Robin Baum
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1 part of the record.) 14:19:52

FSPK 2 A I think the writer's -- sorry. I think 14:20:06

3 the writer's intention was to write a negative 14:20:10

4 article. 14:20:13

5 Q Thank you. 14:20:16

6 MR. PRESIADO: Can we take a one-second 14:20:18

7 break? I got an e-mail that I need to return. 14:20:19

8 Just a couple minutes. 14:20:22

9 MS. PINTADO: Sure. 14:20:24

10 MR. PRESIADO: Thanks. 14:20:24

11 MS. PINTADO: Off the record. 14:20:25

12 THE VIDEOGRAPHER: Off the record at 2:20. 14:20:25

13 (Recess was held.) 14:23:31

14 THE VIDEOGRAPHER: Back on the record at 14:23:31

15 2:23. 14:23:36

16 BY MS. PINTADO: 14:23:38

FSPK 17 Q Ms. Baum, did you attempt any damage 14:23:39

18 control after the Rolling Stone article was 14:23:40

19 published? 14:23:44

20 MR. PRESIADO: Objection; vague and 14:23:46

21 ambiguous, assumes facts not in evidence. 14:23:49

FSPK 22 THE WITNESS: I don't -- I just -- I don't 14:23:53

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Transcript of Robin Baum
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R, FSPK 1	recall.	14:23:55
2	Q Okay.	14:23:55
3	MS. PINTADO: We can take this exhibit	14:23:58
4	down.	14:24:00
R, FSPK 5	Q Do you know who Gregg Brooks is?	14:24:03
6	A Yes.	14:24:05
7	Q Who is Gregg Brooks?	14:24:09
8	A I don't -- I know he was associated with	14:24:11
9	City of Lies, and I do -- I don't remember -- I	14:24:16
10	don't -- I can't think of exactly what his job	14:24:19
11	responsibility was at the moment for some reason.	14:24:23
R, FSPK 12	Q Did Ms. -- did Mr. Brooks sue Mr. Depp?	14:24:25
13	A Yes.	14:24:32
14	Q What did he sue him about?	14:24:35
15	A He sued him over --	14:24:39
16	MS. HOUCK: Objection; calls for	14:24:42
17	speculation.	14:24:44
R, FSPK 18	Q What do you recall about the litigation?	14:24:46
19	A I'm completely paraphrasing, but I --	14:24:47
20	he -- he sued him over some altercation on set.	14:24:57
21	Q Do you recall that there was an allegation	14:24:59
22	that Mr. Depp punched him in the ribs twice?	14:25:05

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1	A I remember -- I recall that that's what he	14:25:08
2	claims.	14:25:17
3	Q Did that allegation have any impact on	14:25:18
4	Mr. Depp's reputation?	14:25:24
5	MR. PRESIADO: Objection; calls for	14:25:27
6	speculation, lacks foundation, and may -- and to	14:25:28
7	the extent it calls for opinion testimony.	14:25:33
8	MS. HOUCK: Join.	14:25:37
9	THE WITNESS: I believe that someone	14:25:49
10	related to the movie publicly denied that that	14:25:51
11	happened.	14:25:58
12	Q At the time -- at the time that he --	14:26:00
13	Mr. Depp was sued by Mr. Brooks, did that story --	14:26:05
14	sorry. Excuse me -- did that lawsuit impact	14:26:12
15	Mr. Depp's career in any way?	14:26:16
16	MR. PRESIADO: Objection; lacks	14:26:18
17	foundation, calls for speculation, vague and	14:26:19
18	ambiguous, and object to the extent it calls for	14:26:22
19	expert opinion.	14:26:24
20	MS. HOUCK: Join.	14:26:25
21	THE WITNESS: I am pretty sure that that	14:26:37
22	lawsuit was after Amber's allegations against him.	14:26:41

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Transcript of Robin Baum
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R, FSPK	1	Q Okay. And what does that mean?	14:26:51
	2	A I don't believe that this -- this -- I	14:26:55
R, FSPK	3	don't believe -- I'm speaking for myself. I don't	14:27:06
	4	think that this lawsuit did any further damage	14:27:09
	5	than what her allegations have done.	14:27:16
	6	Q Okay. Her allegations prior to this	14:27:23
	7	lawsuit?	14:27:28
	8	A Correct.	14:27:29
	9	Q And had -- those allegations that were	14:27:35
	10	involved with the divorce proceedings and the	14:27:38
	11	domestic violence order, had those done damage to	14:27:41
	12	Mr. Depp's reputation and career?	14:27:45
	13	A Yes.	14:27:47
	14	Q And would -- strike that.	14:27:47
	15	Would another allegation of violence	14:28:03
	16	impact that in any way?	14:28:07
	17	MR. PRESIADO: Objection; calls for	14:28:09
	18	speculation, lacks foundation, vague and	14:28:10
	19	ambiguous.	14:28:13
	20	MS. HOUCK: Join.	14:28:13
	21	THE WITNESS: I'm not -- I'm not sure what	14:28:19
	22	the question is.	14:28:22

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1	Q Mr. Brooks was alleging violence by	14:28:23
2	Mr. Depp, correct, in his -- in his lawsuit?	14:28:28
3	A Yes.	14:28:32
4	Q Would that have any impact at all on	14:28:33
5	Mr. Depp's reputation?	14:28:40
6	MR. PRESIADO: Objection; calls for	14:28:42
7	speculation, lacks foundation.	14:28:44
8	MS. HOUCK: Join.	14:28:46
9	MR. PRESIADO: Asked and answered.	14:28:51
10	THE WITNESS: I -- I'm speaking for	14:28:52
11	myself. I don't believe it did any further	14:28:54
12	damage. And I believe that at the time prior to	14:28:57
13	the lawsuit, somebody involved with the film	14:29:02
14	denied that the incident happened --	14:29:08
15	Q That's not what I'm asking.	14:29:11
16	A -- in the press.	14:29:12
17	Sorry.	14:29:16
18	Q That's okay.	14:29:17
19	MS. PINTADO: Exhibit 11.	14:29:19
20	AV TECHNICIAN: Please stand by.	14:29:19
21	(Exhibit 6, Variety article, was marked	14:29:46
22	for identification and is attached to the	14:29:46

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Transcript of Robin Baum
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1	transcript.)	14:29:48
H, F/A, FSPK 2	AV TECHNICIAN: Exhibit 6.	14:29:48
3	BY MS. PINTADO:	14:29:51
H, F/A, FSPK 4	Q Ms. Baum, do you recall seeing this	14:29:51
5	article?	14:29:52
6	MR. PRESIADO: Objection; vague and	14:29:56
7	ambiguous, lacks authentication.	14:30:02
8	Does it say anywhere on there where it's	14:30:05
9	from?	14:30:08
10	MS. PINTADO: I'm asking her if she's ever	14:30:10
11	seen it.	14:30:12
12	MR. PRESIADO: Okay. Vague and ambiguous.	14:30:13
H, F/A, FSPK 13	THE WITNESS: I -- I'm sure I saw it at	14:30:17
14	the time. I just can't give you a hundred percent	14:30:18
15	that I saw this particular article.	14:30:21
16	Q But you saw other articles about the --	14:30:25
17	let me rephrase that.	14:30:29
H, F/A, FSPK 18	You at least saw some article about	14:30:31
19	Mr. Depp's location manager, punching him?	14:30:36
20	A Yes.	14:30:39
21	Q Punching the location manager.	14:30:40
22	And was there a large amount of --	14:30:46

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Transcript of Robin Baum
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1 MR. PRESIADO: Well, allegedly. So I 14:30:50
2 would say misstates testimony, assumes facts not 14:30:54
3 in evidence. 14:30:58
4 BY MS. PINTADO: 14:31:02

H,FSPK 5 Q Was this story picked up by the press? 14:31:02
6 A Yes. 14:31:05
7 Q Was there a lot of press around this 14:31:06
8 story? 14:31:11
9 A I believe so. 14:31:11

10 MS. PINTADO: Let's look at Exhibit 12. 14:31:21
11 (Exhibit 7, GQ article, Bates Nos. F1156 14:31:28
12 through F1171, was marked for identification and 14:31:28
13 is attached to the transcript.) 14:31:44
14 AV TECHNICIAN: Exhibit 7. 14:31:44
15 Q And this exhibit is 16 pages. You can 14:31:47
16 look through it for a moment. 14:31:54
17 A I can't get it -- oh, there we go. 14:32:10

H,FSPK 18 Q And I'll direct your attention to the 14:32:18
19 bottom of the page here. It says GQ.CO.UK? 14:32:20
20 A Yeah. 14:32:29

21 Do you want me to read the entire thing? 14:32:29

H,FSPK 22 Q No. Do you recall seeing this article? 14:32:31

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CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum
Conducted on January 20, 2022

92

R, H, FSPK	1	A Yes.	14:32:35
	2	Q And would you agree that GQ had a large	14:32:36
	3	audience at the time of its publication?	14:32:43
	4	MR. PRESIADO: Objection; calls for --	14:32:46
R, H, FSPK	5	THE WITNESS: Yes.	14:32:47
	6	MR. PRESIADO: -- speculation.	14:32:47
	7	THE WITNESS: Sorry.	14:32:50
R, H, FSPK	8	Q And this was published in November 2018,	14:32:52
	9	correct?	14:32:55
	10	A Yes.	14:32:59
	11	Q Are you aware that the GQ article	14:33:01
	12	discussed Amber Heard's allegations of domestic	14:33:04
	13	violence?	14:33:08
	14	A I mean, I have to reread it, but I -- yes.	14:33:08
	15	Q Are you aware that the article discussed	14:33:17
	16	the Rolling Stone article?	14:33:23
	17	A I'd have to reread it. I don't remember.	14:33:25
	18	Q Okay. I'll take back control, and,	14:33:28
	19	hopefully, I can find that section.	14:33:31
	20	Can you read just these two paragraphs at	14:33:59
	21	F1161 that begin: Perspective can be a	14:34:04
	22	treacherous thing. It can be hoodwinked.	14:34:08

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CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum

Conducted on January 20, 2022

93

1 A Yeah. I'm going to do my best. It's very 14:34:11

2 small. 14:34:14

3 Q We can make that bigger, too. 14:34:14

4 A Okay. Thank you. That's good. That's 14:34:16

5 too big. That's good. Well... 14:34:22

6 Q I'm trying to get there. Hang on. 14:34:25

7 A Okay. 14:34:27

8 Q There we go. There we go. 14:34:28

9 A Am I just reading the first paragraph? 14:35:02

10 Q Just the first two paragraphs. 14:35:04

11 A Okay. I'm done. 14:35:06

R, H,
FSPK

12 Q Okay. And does that refresh your 14:35:07

13 recollection as to whether the article discussed 14:35:09

14 the Rolling Stone article? 14:35:10

15 A Yes; it mentions the Rolling Stone 14:35:12

16 article. 14:35:16

17 Q And does it refresh your recollection at 14:35:17

18 all as to how Mr. Depp felt about the Rolling 14:35:21

19 Stone article? 14:35:27

20 MR. PRESIADO: Objection; calls for 14:35:32

21 speculation -- 14:35:33

22 THE WITNESS: Well, yes. 14:35:33

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CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum
Conducted on January 20, 2022

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1	MR. PRESIADO: -- lacks foundation.	14:35:34
2	THE WITNESS: It has -- the writ- --	14:35:38
3	MS. HOUCK: Are you asking if it --	14:35:40
4	THE WITNESS: -- the writer replies.	14:35:41
5	BY MS. PINTADO:	14:35:43
R, H, FSPK 6	Q Okay. And did -- this GQ article, were	14:35:43
7	you involved in setting that up in any way?	14:35:49
8	A No, I wasn't.	14:35:54
9	Q Do you know who was?	14:35:57
10	A There was a firm that was hired out of the	14:35:58
11	U.K. that I don't remember the name that brought	14:36:11
12	this piece to Johnny.	14:36:17
13	Q It was a firm working for Mr. Depp?	14:36:22
14	A Well, I don't -- I couldn't tell you who	14:36:26
15	hired the firm, but the -- there was a firm hired	14:36:32
16	in the U.K.	14:36:36
17	Q That was working on behalf of Mr. Depp?	14:36:38
18	A Yes.	14:36:41
19	Q And you don't remember the name of that?	14:36:42
20	A I don't.	14:36:46
21	Q Do you remember anyone who worked there?	14:36:48
22	A I had very little contact.	14:36:50

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CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum

Conducted on January 20, 2022

95

1	Q	Would you say that this article impacted	14:36:54	
2		Mr. Depp's reputation in any way?	14:37:02	
3	MS. HOUCK:	Objection; calls for	14:37:06	
4		speculation --	14:37:07	
5	MR. PRESIADO:	Lacks foundation.	14:37:08	
6	MS. HOUCK:	-- vague and ambiguous.	14:37:10	
7	THE WITNESS:	I don't remember what the	14:37:12	
8		response was.	14:37:13	
9	Q	Okay.	14:37:14	
10	MS. PINTADO:	All right. We can take this	14:37:23	
11		one down.	14:37:24	
R,H, FSPK	12	Q	Are you aware that Mr. Depp brought a	14:37:32
	13		lawsuit in the U.K. against The Sun and	14:37:34
	14		Mr. Wootton on June 13, 2018?	14:37:37
	15	A	I don't know the date, but --	14:37:41
	16		specifically, but I know the -- I'm aware of the	14:37:44
	17		lawsuit.	14:37:48
	18	Q	And what was the lawsuit about?	14:37:48
	19	A	Referring him to -- as a wife beater.	14:37:50
	20	Q	Okay. And did that lawsuit have any	14:37:58
	21		impact on what you were doing for Mr. Depp's	14:38:03
	22		publicity?	14:38:06

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CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum
Conducted on January 20, 2022

96

1	MS. HOUCK: Objection; vague and	14:38:15
2	ambiguous.	14:38:16
3	MR. PRESIADO: Join.	14:38:16
4	BY MS. PINTADO:	14:38:20
5	Q Did that lawsuit affect your work in any	14:38:20
6	way?	14:38:23
7	MR. PRESIADO: Vague and ambiguous.	14:38:23
8	MS. HOUCK: Join.	14:38:24
9	THE WITNESS: I'm just trying to figure	14:38:28
10	out -- I don't -- I don't even -- I don't	14:38:32
11	remember. I don't remember. I don't remember	14:38:40
12	what work -- I -- if any, I did.	14:38:47
13	Q Would you say that -- strike that.	14:38:55
R,H, FSPK 14	Did that lawsuit receive any publicity?	14:38:59
15	A Yes.	14:39:04
16	Q And would you say that publicity was	14:39:05
17	negative or positive?	14:39:09
18	A I --	14:39:10
19	MS. HOUCK: I'm going to object --	14:39:37
20	THE WITNESS: I wouldn't --	14:39:39
21	MS. HOUCK: -- that it's compound.	14:39:41
22	THE WITNESS: I wouldn't --	14:39:43

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CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum
Conducted on January 20, 2022

97

1	MR. PRESIADO: Join.	14:39:44
2	THE WITNESS: Sorry.	14:39:45
3	I -- I don't know how to define it,	14:39:48
4	negative or positive.	14:39:50
5	BY MS. PINTADO:	14:39:56
R, H, FSPK	6 Q Were allegations of Mr. Depp's abuse of	14:39:56
	7 Ms. Heard once again in the public eye?	14:40:03
	8 A Yes.	14:40:11
	9 Q And would you say that was negative or	14:40:12
	10 positive?	14:40:13
	11 A That portion --	14:40:14
	12 MS. HOUCK: Objection --	14:40:16
	13 THE WITNESS: -- was negative.	14:40:17
	14 MS. HOUCK: -- compound.	14:40:18
	15 Q Can you repeat your answer.	14:40:20
R, H, FSPK	16 A That portion of what you just said would	14:40:21
	17 be neg- -- would be negative.	14:40:24
	18 Q Is it fair to say that the allegations of	14:40:30
	19 Mr. Depp's abuse of Ms. Heard had been widely	14:40:36
	20 publicized prior to the publication of the op-ed	14:40:41
	21 that was published in The Washington Post?	14:40:46
	22 MR. PRESIADO: Objection; vague and	14:40:50

CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum
Conducted on January 20, 2022

98

1	ambiguous, calls for speculation, lacks	14:40:51
2	foundation, assumes facts not in evidence --	14:40:53
3	MS. HOUCK: Join.	14:40:56
4	MR. PRESIADO: -- leading.	14:40:58
5	THE WITNESS: If you want -- can you	14:41:06
6	repeat the question.	14:41:07
7	MS. PINTADO: Let's read it back.	14:41:11
8	Actually, I'll just read it.	14:41:11
9	BY MS. PINTADO:	14:41:14
10	Q Is it fair to say that the allegations of	14:41:14
11	Mr. Depp's abuse of Ms. Heard had been widely	14:41:17
12	publicized prior to the publication of the op-ed	14:41:20
13	in The Washington Post on December 18, 2018?	14:41:24
14	MR. PRESIADO: Same objections.	14:41:28
15	Q Yes or no.	14:41:48
16	MR. PRESIADO: Objection.	14:41:49
17	MS. HOUCK: Or -- yeah. Or whatever is	14:41:50
18	your answer, "I don't know," or whatever it is.	14:41:51
19	Q Had allegations of Mr. Depp's abuse of	14:41:57
20	Ms. Heard been widely publicized before	14:42:00
21	December 18, 2018?	14:42:03
22	MR. PRESIADO: Objection; lacks	14:42:07

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Transcript of Robin Baum

Conducted on January 20, 2022

99

1 foundation, calls for speculation -- 14:42:07

2 THE WITNESS: I -- 14:42:07

3 MR. PRESIADO: -- to the extent it calls 14:42:09

4 for expert opinion. 14:42:11

5 MS. HOUCK: Join. 14:42:13

6 THE WITNESS: I can't -- I'm not aware of 14:42:14

7 the time frame between her initial allegations 14:42:21

8 surrounding the divorce and the 2018, so I -- it's 14:42:24

9 hard -- you're asking me if it was widely -- 14:42:29

10 BY MS. PINTADO: 14:42:32

11 Q I'll represent to you that the divorce was 14:42:32

12 in 2016. 14:42:35

13 A So -- 14:42:39

14 Q Would that -- 14:42:40

UN 15 A -- I would say that there was a lot of 14:42:41

16 press around 2016 and then a pause before her 14:42:43

17 op-ed. 14:42:53

18 Q But you said that it was also raised again 14:42:55

19 in the public eye when the lawsuit was filed, 14:42:59

20 isn't that correct, in the U.K.? And that was -- 14:43:02

21 A There was a lawsuit -- 14:43:06

22 Q -- that was on June 13, 2018. 14:43:08

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CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum
Conducted on January 20, 2022

100

1	MR. PRESIADO: Objection; vague and	14:43:14
2	ambiguous as to "public eye."	14:43:15
3	MS. HOUCK: I'm sorry, Madam Court	14:43:19
4	Reporter, could you reread the question.	14:43:21
5	MS. PINTADO: No. We're not going to	14:43:23
6	reread the question every time.	14:43:25
7	So --	14:43:26
8	MS. HOUCK: I don't --	14:43:27
9	THE WITNESS: I'm not clear --	14:43:27
10	MS. HOUCK: I -- do you have a question in	14:43:28
11	mind, Ms. Baum?	14:43:29
12	THE WITNESS: I'm not clear --	14:43:29
13	MS. HOUCK: I don't have the question --	14:43:30
14	THE WITNESS: -- of the -- of the timeline	14:43:31
15	you're asking me. You're -- you are asking me if	14:43:33
16	there was a lot of press about her allegations	14:43:38
17	prior to her op-ed?	14:43:43
18	BY MS. PINTADO:	14:43:45
19	Q Correct.	14:43:45
20	A Right?	14:43:47
21	Q Yes.	14:43:47
22	A And her op-ed was before the lawsuit to	14:43:48

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CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum
Conducted on January 20, 2022

101

H, FSPK	1	The Sun?	14:43:54
	2	Q No; incorrect.	14:43:54
	3	A So it went divorce, The Sun, her op-ed.	14:44:02
	4	Q That's correct.	14:44:09
	5	MS. HOUCK: Robin, do you know --	14:44:20
H, FSPK	6	THE WITNESS: I don't recall --	14:44:20
	7	MS. HOUCK: -- what the question is --	14:44:21
H, FSPK	8	THE WITNESS: -- that timeline, so I can't	14:44:22
	9	answer the question.	14:44:23
	10	Q It's fair to say there was a tremendous	14:44:26
	11	amount of publicity about Mr. Depp abusing	14:44:31
	12	Ms. Heard, allegations of Mr. Depp abusing	14:44:35
	13	Ms. Heard, in 2016 and 2017; isn't that correct?	14:44:40
	14	MR. PRESIADO: Objection; vague and	14:44:45
	15	ambiguous.	14:44:46
	16	MS. HOUCK: Join.	14:44:47
H, FSPK	17	THE WITNESS: There was a lot of press in	14:44:50
	18	2016 around her initial allegations. I don't know	14:44:52
	19	what happened in 2017.	14:44:56
	20	Q Okay. And then again in 2018 when	14:44:58
	21	Mr. Depp filed the lawsuit in the U.K. against The	14:45:04
	22	Sun and Mr. Wootton; isn't that correct?	14:45:08

CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum
Conducted on January 20, 2022

102

1	MR. PRESIADO: Objection; vague and	14:45:11
2	ambiguous.	14:45:13
3	MS. HOUCK: Join.	14:45:13
4	THE WITNESS: I would be speculating. I	14:45:14
5	don't -- I don't -- I don't remember how much	14:45:16
6	press.	14:45:19
7	BY MS. PINTADO:	14:45:20
8	Q Okay.	14:45:20
9	MS. PINTADO: Let's look at Exhibit 13.	14:45:29
10	AV TECHNICIAN: Stand by.	14:45:35
11	(Exhibit 8, Royal Courts of Justice	14:45:37
12	Approved Judgment, was marked for identification	14:45:37
13	and is attached to the transcript.)	14:45:50
14	AV TECHNICIAN: Exhibit 8.	14:45:50
R, FSPK 15	Q Ms. Baum, do you remember that -- do you	14:45:53
16	recall when the judgment was issued in the U.K.	14:46:07
17	regarding the litigation involving The Sun and	14:46:10
18	Mr. Wootton?	14:46:14
19	A Do I remember when the -- they made --	14:46:17
20	when they ruled again -- when they made the	14:46:22
21	judgment? Is that what you're asking me?	14:46:26
22	Q Yes.	14:46:30

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Transcript of Robin Baum
Conducted on January 20, 2022

103

VA, FSPK ¹	A Yes.	14:46:30
2	Q Okay. And when was that?	14:46:31
3	A I think -- I don't remember the year. But	14:46:33
4	it -- was it in November, October?	14:46:36
VA, FSPK ⁵	Q I'll represent to you that it was in	14:46:39
6	November of 2020.	14:46:42
7	And what -- what is your understanding	14:46:46
8	of -- strike that.	14:46:55
VA, FSPK ⁹	Did the judgment receive publicity?	14:46:57
10	MR. PRESIADO: Objection; vague and	14:47:03
11	ambiguous. That's it.	14:47:04
12	MS. HOUCK: Join.	14:47:11
VA, FSPK ¹³	THE WITNESS: Yes.	14:47:12
14	Q And what do you mean by publicity?	14:47:13
15	A Well, the press reported.	14:47:17
16	Q Would you say it generated a lot of	14:47:22
17	publicity?	14:47:26
18	MS. HOUCK: Objection; vague and	14:47:32
19	ambiguous.	14:47:34
20	MR. PRESIADO: Vague and ambiguous as to	14:47:34
21	publicity where, so... Just in general, global,	14:47:35
22	in the U.K.?	14:47:41

CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum

Conducted on January 20, 2022

104

VA, FSPK

1

THE WITNESS: I would say it got a lot of

14:47:44

2

press.

14:47:47

3

BY MS. PINTADO:

14:47:47

4

Q Did it get a lot of press in the U.K.?

14:47:47

5

A I don't live in the U.K., so I don't know

14:47:51

6

specifically --

14:47:56

7

Q Did it get a lot of --

14:47:59

8

A -- the amount.

14:48:01

VA, FSPK 9

10

Q Okay. Did it get a lot of press in the

14:48:02

U.S.?

14:48:04

11

A It got a lot -- yeah, it got covered in

14:48:04

12

all the -- in the press.

14:48:07

13

Q Where in the press, do you remember?

14:48:10

14

A What specific outlets?

14:48:13

15

Q Yes. If you recall.

14:48:19

16

A I -- I mean, I -- I couldn't list you all

14:48:26

17

the outlets that it ran in. I -- I -- I -- but it

14:48:29

18

ran in a majority amount of press.

14:48:33

19

Q Okay. And would you characterize that

14:48:40

20

press as negative or positive for Mr. Depp?

14:48:43

21

MS. HOUCK: Objection; vague and

14:48:51

22

ambiguous.

14:48:52

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CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum
Conducted on January 20, 2022

105

1	MR. PRESIADO: Objection; lacks	14:48:52
2	foundation, calls for speculation. And object to	14:48:55
3	the extent it calls for expert opinion.	14:48:58
FSPK 4	THE WITNESS: I would say it was not	14:49:02
5	positive.	14:49:04
6	BY MS. PINTADO:	14:49:04
FSPK 7	Q Do you know if Mr. Depp lost any roles as	14:49:04
8	a result of the judgment?	14:49:13
9	MR. PRESIADO: Objection; lacks	14:49:16
10	foundation, calls for speculation.	14:49:17
11	MS. HOUCK: Join.	14:49:20
12	THE WITNESS: I -- I believe it's my -- I	14:49:20
FSPK 13	mean, it's my understanding that he lost the	14:49:26
14	Fantastic Beasts, maybe, he was supposed to do.	14:49:29
15	Q Did your role as publicist change after	14:49:34
16	the filing of the lawsuit -- sorry, after the	14:49:43
17	judgment?	14:49:45
18	A No. I don't know what you mean by that,	14:49:45
19	though.	14:49:55
20	Q Did your work change in any way?	14:49:56
21	MS. HOUCK: Objection; vague and	14:50:05
22	ambiguous.	14:50:13

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Transcript of Robin Baum
Conducted on January 20, 2022

106

1	THE WITNESS: Well, with all my clients	14:50:13
2	there's ebbs and flows, so I don't -- I don't -- I	14:50:14
3	don't believe it changed.	14:50:18
4	BY MS. PINTADO:	14:50:19
5	Q Okay. How has Mr. Depp's alcohol use	14:50:19
6	affected his reputation, if you know?	14:50:28
7	MR. PRESIADO: Objection; asked and	14:50:35
8	answered.	14:50:36
9	THE WITNESS: Well, I can't -- I can't	14:50:41
10	speak on behalf of his productions and his work.	14:50:42
11	It hasn't affected my pub- -- the publicity	14:50:46
12	campaigns.	14:50:51
13	Q Okay. And what about his drug use, has	14:50:52
14	that affected any publicity?	14:50:56
15	MR. PRESIADO: Objection --	14:50:59
16	THE WITNESS: No.	14:50:59
17	MR. PRESIADO: -- assumes facts not in	14:50:59
18	evidence.	14:51:02
19	THE WITNESS: I'm not aware -- I've not --	14:51:02
20	I've never seen him do drugs.	14:51:07
21	Q Okay.	14:51:09
22	MS. PINTADO: Let's look at Exhibit 15.	14:51:12

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Transcript of Robin Baum
Conducted on January 20, 2022

107

1 (Exhibit 9, Chain of e-mails dated 14:51:36
2 6/22/17, Bates Nos. CC000087 through CC000092, was 14:51:36
3 marked for identification and is attached to the 14:51:36
4 transcript.) 14:51:37

F/A 5 AV TECHNICIAN: Exhibit 9. 14:51:37

6 MS. PINTADO: And this document is Bates 14:51:41
7 numbered -- 14:51:45

8 If I can have control. 14:51:46

9 THE WITNESS: Is it just the one page? 14:51:49

10 MS. PINTADO: It is six pages, but I'm 14:51:51
11 just trying to scroll. Hold on a minute. So this 14:51:53
12 is Bates numbered CC000087. And I will scroll 14:52:00
13 down to the bottom. 14:52:13

14 BY MS. PINTADO: 14:52:13

F/A 15 Q Do you recall sending this e-mail, 14:52:29

16 Ms. Baum? 14:52:31

17 A Actually, I really don't remember sending 14:52:32
18 it, but I see it. 14:52:37

19 Q And this -- sorry. This is CC00092. 14:52:38

20 And your e-mail is robin@slate-pr, 14:52:48
21 correct? 14:52:50

22 A Yup. 14:52:51

CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum
Conducted on January 20, 2022

108

R, H, FSPK	1	Q And the subject of this is: Wait, Johnny	14:52:52
	2	Depp's Management Knew Of His Alleged Assaults On	14:52:56
	3	Amber Heard.	14:52:56
	4	You said, Here is another. Now this could	14:53:01
	5	hurt him.	14:53:03
	6	What did you mean by that?	14:53:03
	7	A I mean, I don't remember what the actual	14:53:05
	8	article says, the actual Perez Hilton article. I	14:53:08
	9	don't remember. But, obviously, I didn't think it	14:53:14
	10	was good.	14:53:17
	11	Q Okay. And it looks like this was the	14:53:20
	12	title of the article: Wait, Johnny Depp's	14:53:23
	13	Management Knew Of His Alleged Assault On Amber	14:53:23
	14	Heard.	14:53:29
	15	Why could that hurt him?	14:53:29
	16	MR. PRESIADO: Objection --	14:53:29
R, H, FSPK	17	THE WITNESS: I don't know -- I honestly	14:53:40
	18	don't know what the article says. I see -- I see	14:53:42
	19	what -- the headline, but the headline doesn't	14:53:45
	20	necessarily mean what the article says. So I	14:53:47
	21	would have to see the article to answer that	14:53:49
	22	question.	14:53:52

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CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum

Conducted on January 20, 2022

109

1	Q Okay. Scrolling up --	14:53:57
2	You don't remember what the article was	14:53:58
3	about?	14:54:00
4	A No.	14:54:00
5	Q Okay. And scrolling up in this same	14:54:01
6	chain, I believe, here you say, It's been picked	14:54:08
7	up everywhere and could continue past this first	14:54:20
8	round of stories. I haven't seen a tweet from DT	14:54:22
9	yet in response.	14:54:26
10	Who is "DT"?	14:54:28
11	A I -- I'm only looking at the subject line	14:54:29
12	ahead where it says, Donald Trump, so I'm thinking	14:54:37
13	this is related to when he spoke about Donald	14:54:41
14	Trump at Glastonbury.	14:54:46
15	Q Okay.	14:54:48
16	A That's where -- that line -- that's what	14:54:49
17	I'm talking about.	14:54:50
18	Q Okay. And here you have: On top of this	14:54:51
19	story we have this one too. Twitter is active.	14:54:53
20	And it's aol.com, and then here it says,	14:54:57
21	Johnny Depp management knew about Amber Heard	14:55:01
22	abuse.	14:55:04

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CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum
Conducted on January 20, 2022

110

1	Do you see that?	14:55:04
2	A Yeah, I see it.	14:55:05
3	Q Okay. And then Christi Dembrowski writes:	14:55:08
4	We should talk.	14:55:11
5	Do you see that?	14:55:12
6	A Yeah.	14:55:12
7	Q And she -- you add Bryan. Who is Bryan	14:55:14
8	Lourd?	14:55:21
9	A One of his -- one of his agents at the	14:55:21
10	time.	14:55:25
11	Q One of Mr. Depp's agents?	14:55:28
12	A Yeah.	14:55:30
13	Q And --	14:55:35
14	A But this is in relation to Donald Trump.	14:55:36
15	Q Okay. And you say -- sorry, Jack Whigham	14:55:41
16	writes: Christi and I spoke tonight. I'm around	14:55:45
17	now RB if you can chat...otherwise, call you in	14:55:48
18	the morning.	14:55:50
19	What did you discuss there?	14:55:51
20	MS. HOUCK: Objection; assume facts.	14:55:53
21	THE WITNESS: I have --	14:55:55
22	Q I'm sorry.	14:55:55

CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum

Conducted on January 20, 2022

111

1	A -- absolutely no idea, but this is all in	14:55:56
2	relation to Donald Trump comments.	14:55:59
3	Q All right. Do you remember having a	14:56:02
4	conversation with Christi Dembrowski about this	14:56:04
5	article, Johnny Depp Management Knew About Amber	14:56:07
6	Heard Abuse?	14:56:12
7	A I don't. I didn't even remember ever	14:56:12
8	sending the e-mail or the article until you just	14:56:15
9	showed it to me.	14:56:17
10	Q Okay. Did Johnny Depp's management know	14:56:19
11	about any abuse, to your knowledge?	14:56:22
12	A I -- I -- I don't believe so. I don't	14:56:26
13	even know what management they're talking about in	14:56:32
14	the article. I don't know who the management is.	14:56:34
15	Q All right.	14:56:38
16	MS. PINTADO: Let's look at 16.	14:56:40
17	(Exhibit 10, Excerpt from John C. Depp's	14:56:46
18	deposition transcript taken on 11/10/20, pages 95	14:56:46
19	and 96, was marked for identification and is	14:56:46
20	attached to the transcript.)	14:56:47
21	AV TECHNICIAN: Exhibit 10.	14:56:47
22	Q And I'll represent to you that this is a	14:57:04

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CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum

Conducted on January 20, 2022

112

1	transcript of Mr. Depp in this litigation on	14:57:10
2	November 10, 2020.	14:57:15
3	A Who's -- oh, okay.	14:57:19
4	Q And just bear with me for a moment. I'm	14:57:24
5	scrolling down here.	14:57:28
6	He's asked: So do you have any	14:57:32
7	recollection of Robin Baum talking to you at all	14:57:34
8	about Disney's decision not to use you for Pirates	14:57:37
9	6?	14:57:42
10	And he responds: Frankly, I remember	14:57:42
11	Robin Baum kind of being scared of all the	14:57:43
12	allegations that were surrounding me and this new	14:57:46
13	identity I'd been given, you know, beyond	14:57:49
14	Quasimodo, such as wife beater.	14:57:52
15	Were you scared of all the allegations	14:57:55
16	surrounding Mr. Depp?	14:57:57
17	A I don't know that "scared" is the word.	14:57:58
18	Concerned.	14:58:07
19	Q Why were you concerned?	14:58:10
20	A Well, no one wants to have allegations	14:58:14
21	surrounding them.	14:58:18
22	Q But isn't it part of your job to deal with	14:58:23

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CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum

Conducted on January 20, 2022

113

1	that press?	14:58:26
2	A It doesn't mean I'm going to make it go	14:58:27
3	away.	14:58:30
4	MS. PINTADO: Let's look at 17.	14:58:37
5	(Exhibit 11, Excerpt from John C. Depp's	14:58:40
6	deposition transcript taken on 11/12/20, pages 622	14:58:40
7	through 626, was marked for identification and is	14:58:40
8	attached to the transcript.)	14:58:40
9	AV TECHNICIAN: Exhibit 11.	14:58:40
10	Q Here Mr. Depp says, We did speak a couple	14:58:57
11	of times. I think she was overwhelmed -- I think	14:59:21
12	Ms. Baum was overwhelmed with the -- with what	14:59:24
13	appeared to be the imminent death of me, and,	14:59:26
14	therefore, didn't really take much -- well, many	14:59:31
15	many many many many people in Hollywood were	14:59:34
16	scared to take a stand on anyone.	14:59:38
17	Were you overwhelmed by the "imminent	14:59:41
18	death" of Mr. Depp?	14:59:43
19	A No. I don't think I was over- -- I don't	14:59:44
20	know that I would classify it as "overwhelmed."	14:59:47
21	Q You wouldn't agree with his statements	14:59:56
22	here that you were "overwhelmed"? Just that one	14:59:58

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CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum
Conducted on January 20, 2022

114

1	statement that you were "overwhelmed."	15:00:09
2	A No, I -- I don't -- I don't agree that I	15:00:13
3	was overwhelmed --	15:00:15
4	Q Okay.	15:00:20
5	A -- with the imminent death of him.	15:00:21
6	Q Thank you.	15:00:25
7	Are you aware of the domestic violence	15:00:33
8	events or alleged events that occurred between	15:00:37
9	Mr. Depp and Ms. Heard on May 21, 2016?	15:00:39
10	MR. PRESIADO: Objection; vague and	15:00:43
11	ambiguous, assumes facts not in evidence,	15:00:46
12	compound.	15:00:49
13	Q You can answer.	15:00:50
14	A I'm sorry, I have to ask you to repeat it	15:00:51
15	because I just spaced out for a second.	15:00:53
16	Q Are you aware of the domestic violence	15:00:55
17	events or alleged events that occurred between	15:00:59
18	Mr. Depp and Ms. Heard on May 21, 2016?	15:01:03
19	MR. PRESIADO: Objection; compound, vague	15:01:06
20	and ambiguous.	15:01:09
21	THE WITNESS: I'm aware --	15:01:09
22	MS. HOUCK: Join.	15:01:11

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CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum

Conducted on January 20, 2022

115

1	THE WITNESS: -- of what was reported.	15:01:11
2	BY MS. PINTADO:	15:01:14
3	Q What was reported?	15:01:14
4	A Of -- of what -- of her allegations for	15:01:15
5	that May 21st?	15:01:20
6	Q Yes. What do you recall?	15:01:24
7	A Oh, what do I recall?	15:01:26
8	Q What do you recall was reported?	15:01:29
9	A I'm sorry, what? I spoke over you.	15:01:32
10	Q What do you recall being reported?	15:01:35
11	A That they got into a fight and they were	15:01:37
12	at the apartment and he threw a phone. That's	15:01:49
13	what I -- those are the highlights.	15:01:56
14	Q Where did he throw the phone?	15:01:58
15	A Towards her.	15:02:01
16	Q Did the phone hit --	15:02:02
17	A Allegedly.	15:02:05
18	Q -- her?	15:02:04
19	A Allegedly.	15:02:05
20	Q In the reports did -- that you read, did	15:02:07
21	the phone allegedly hit her?	15:02:09
22	A I think that's what she said.	15:02:11

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CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum
Conducted on January 20, 2022

116

1	Q And during that time and the week	15:02:18
2	following, were you aware that Ms. Heard had	15:02:24
3	planned to file for divorce?	15:02:26
4	A The week before what?	15:02:29
5	Q During that time -- when did you become	15:02:36
6	aware that Amber was filing for divorce?	15:02:41
7	A From what I can remember, I believe I	15:02:44
8	found out before the allegations came out.	15:03:01
9	Q And were you aware that she had -- when	15:03:06
10	did you become aware that she was planning to file	15:03:19
11	a restraining order?	15:03:21
12	MS. HOUCK: Objection; assumes facts,	15:03:25
13	lacks foundation.	15:03:29
14	MR. PRESIADO: Join.	15:03:30
15	THE WITNESS: I -- I -- I'm sorry, I don't	15:03:31
16	remember the time -- I don't remember --	15:03:33
17	Q That's okay.	15:03:35
18	A -- the timing and...	15:03:36
19	Q But at some point you learned that she was	15:03:39
20	going to file a restraining order.	15:03:42
21	A Correct.	15:03:43
22	Q Okay. And what did you do to prepare for	15:03:45

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CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum

Conducted on January 20, 2022

117

1	the press onslaught?	15:03:51
2	A I just -- I don't know -- I can't answer	15:03:59
3	that. I don't know specifically.	15:04:08
4	Q All right.	15:04:10
5	MS. PINTADO: Let's -- let's pull up 18.	15:04:10
6	(Exhibit 12, Chain of e-mails dated	15:04:26
7	5/26/16 and 5/27/16, Bates Nos. BAUM0000154 though	15:04:26
8	BAUM0000156, was marked for identification and is	15:04:26
9	attached to the transcript.)	15:04:31
10	AV TECHNICIAN: Exhibit 12.	15:04:31
11	Q And what -- are you familiar with this	15:04:34
12	document, Ms. Baum?	15:04:43
13	A I'm fam- -- I'm -- I mean, I see it. I'm	15:04:44
14	familiar with -- not specifically to Dina Sansing,	15:04:50
15	but I'm familiar with the document.	15:04:55
16	Q Okay. And who is Dina Sansing?	15:04:57
17	A She was a -- an -- an editor or a writer	15:05:02
18	from E! News.	15:05:08
19	Q Okay. And she says here: We're running a	15:05:11
20	story on Johnny and Amber split. We have multiple	15:05:15
21	sources reporting it below.	15:05:19
22	And I believe this is also -- this is you.	15:05:26

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CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum

Conducted on January 20, 2022

118

1	It says, Us, robin@slate-pr.	15:05:33
2	Is this your response to the article that	15:05:38
3	NBCUniversal was going to publish?	15:05:42
4	A That is a statement that I sent out to	15:05:46
5	press inquiring.	15:05:51
6	Q And how did you come up with that	15:05:54
7	statement?	15:05:55
8	A I worked on that with Johnny Depp and	15:05:55
9	Christi Dembrowski.	15:06:00
10	Q What was your contribution to it?	15:06:04
11	A I mean, I probably drafted it, and they,	15:06:07
12	you know, gave me their thoughts, and we agreed on	15:06:15
13	it.	15:06:17
14	Q And why was it important to publish a	15:06:18
15	response to this?	15:06:24
16	A I don't know that I can answer it in the	15:06:26
17	way you question -- in the way you're asking.	15:06:38
18	We -- we chose to respond to multiple press	15:06:44
19	inquiries at the time --	15:06:47
20	Q Okay.	15:06:49
21	A -- with the same statement.	15:06:50
22	Q Okay. And why is that?	15:06:51

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CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum

Conducted on January 20, 2022

119

1	A I probably received a lot of them. I	15:06:54
2	can't give you -- I can't -- I can't go back in	15:07:00
3	time and remember specifically how or why.	15:07:03
4	Q Well, what was your reasoning behind	15:07:06
5	deciding to respond rather than just leaving it	15:07:08
6	alone?	15:07:11
7	A I can't recall.	15:07:12
8	Q You don't remember why you would respond	15:07:15
9	to allegations of abuse?	15:07:22
10	MR. PRESIADO: Objection; asked and	15:07:26
11	answered.	15:07:29
12	MS. HOUCK: Join; argumentative.	15:07:29
13	THE WITNESS: I don't -- you're -- you're	15:07:34
14	putting words in -- you're adding words to this.	15:07:36
15	Q All right. Let me scroll down.	15:07:40
16	It says, Amber and Johnny fought a lot and	15:07:46
17	he was very difficult to live with. He barely	15:07:50
18	visited his mother.	15:07:54
19	Why was it important to respond to this	15:07:59
20	story?	15:08:02
21	MR. PRESIADO: Objection; asked and	15:08:03
22	answered, argumentative.	15:08:05

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CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum
Conducted on January 20, 2022

120

1	MS. HOUCK: Join.	15:08:08
2	THE WITNESS: I responded to multiple	15:08:09
3	press inquiries with the same statement regardless	15:08:13
4	of -- you'd have to show me all the other e-mails.	15:08:16
5	BY MS. PINTADO:	15:08:19
6	Q All right. Let's look at another one.	15:08:19
7	MS. PINTADO: Let's look at 19.	15:08:21
8	(Exhibit 13, People article, was marked	15:08:23
9	for identification and is attached to the	15:08:23
10	transcript.)	15:08:36
F/A,H, FSPK 11	AV TECHNICIAN: Exhibit 13.	15:08:36
12	Q Do you remember this article?	15:08:41
13	A I do not.	15:08:48
14	Q I'll give you a second. Maybe if I scroll	15:08:52
F/A,H, FSPK 15	down -- or -- if you scroll down, too. Do you	15:08:54
16	remember this article?	15:08:56
17	A Yes.	15:08:57
18	Q What is it?	15:08:58
19	A It's a cover story about their marriage.	15:09:01
20	Q And it was published on June 13, 2016,	15:09:07
21	correct?	15:09:13
22	A That's what it says, yes.	15:09:13

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Transcript of Robin Baum

Conducted on January 20, 2022

121

F/A, FSPK

1

Q And you remember seeing this?

15:09:15

2

A I do.

15:09:17

3

Q Would you say this was negative press for

15:09:19

4

Mr. Depp?

15:09:25

5

A Yes.

15:09:26

6

Q Why is that?

15:09:33

7

A Because she's -- she's accusing him of

15:09:35

8

inflicting -- like, hurting him -- hurting her.

15:09:42

9

Q And did you provide a comment to People

15:09:47

10

magazine?

15:09:53

11

A I don't remember. You'd have to --

15:09:53

12

Q Okay.

15:09:57

13

A -- show me a document.

15:09:58

F/A,

14

Q Would you say that People magazine has a

15:09:59

FSPK

15

wide readership?

15:10:02

16

A Yes.

15:10:03

17

MS. PINTADO: Let's look at 20.

15:10:06

18

(Exhibit 14, Chain of e-mails dated

15:10:12

19

5/30/16, Bates Nos. BAUM001474 and BAUM001475, was

15:10:12

20

marked for identification and is attached to the

15:10:12

21

transcript.)

15:10:24

F/A,

22

AV TECHNICIAN: Exhibit 14.

15:10:24

FSPK

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CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum

Conducted on January 20, 2022

122

1	MS. PINTADO: Sorry. I apologize -- yeah,	15:10:37
2	this is the right one. Okay.	15:10:39
3	MS. HOUCK: I'm sorry, this is Exhibit 14?	15:10:48
4	AV TECHNICIAN: 14.	15:10:50
5	BY MS. PINTADO:	15:10:50
6	Q So scrolling down --	15:10:51
7	MS. PINTADO: Can I have control.	15:10:56
8	THE WITNESS: Does it scroll down past	15:11:04
9	what I'm seeing?	15:11:05
10	Q I'm trying.	15:11:07
11	A Oh.	15:11:10
12	Q There we go.	15:11:10
R, FSPK 13	Do you know who JD Heyman is?	15:11:11
14	A Yeah. He used to work at People.	15:11:14
15	Q Okay. Do you recognize this e-mail?	15:11:18
16	A I mean, I don't remember it, but I	15:11:21
17	recognize it. I mean, like -- I mean, I don't	15:11:23
18	remember it, but I see it.	15:11:26
19	Q Okay. And it says, People has just	15:11:28
20	obtained these images of Amber Heard, showing	15:11:32
21	injuries she says Johnny Depp gave her in	15:11:35
22	December, as referenced in court filing.	15:11:37

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Transcript of Robin Baum
Conducted on January 20, 2022

123

R,H	1	Do you see where it says that here?	15:11:40
	2	A Yeah.	15:11:48
	3	Q And you asked: Will you be posting these	15:11:48
	4	photos online or will the -- will they be part of	15:11:51
	5	a cover story.	15:11:54
	6	Do you see that?	15:11:56
	7	A Uh-huh.	15:11:56
	8	Q Were you concerned that they might be part	15:11:57
	9	of a cover story?	15:11:58
	10	A I was asking a question that makes sense	15:12:00
	11	to ask.	15:12:06
	12	Q Why were you asking?	15:12:07
	13	A Because you'd want to know. You'd want to	15:12:09
	14	know if it's an online story or is it a cover	15:12:13
	15	story. You want to know the breadth -- the scope	15:12:16
	16	of it.	15:12:19
	17	Q Why is that?	15:12:19
	18	A So you can prepare, so that you would be	15:12:20
	19	knowledgeable.	15:12:28
	20	Q So it would change how you prepared	15:12:29
	21	depending on whether it was going to be on the	15:12:32
	22	cover or...	15:12:35

CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum

Conducted on January 20, 2022

124

R, FSPK

1

A Not necessarily. It's just information.

15:12:37

2

You always want to know all your facts.

15:12:39

3

Q And it was, in fact, a cover story, was it

15:12:41

4

not?

15:12:46

5

A Well -- I'm looking at the date, so I'm

15:12:47

6

assuming this was sent to me before that cover

15:12:51

7

story you just showed me.

15:12:53

8

Q That's right.

15:12:55

9

MS. PINTADO: And let's look at 20.

15:12:58

10

MR. PRESIADO: Is this 20?

15:13:04

11

AV TECHNICIAN: I believe this is 20.

15:13:06

12

MR. PRESIADO: This is 20.

15:13:20

13

MS. PINTADO: Oh, I'm sorry. Exhibit 21.

15:13:22

14

MS. HOUCK: Ms. Pintado, I assume that

15:13:28

15

those -- what you're referring to as Exhibit 20

15:13:31

16

and 21, is that something that you've marked in --

15:13:33

17

you know, for your own purposes? They're not -- I

15:13:36

18

don't need to remember that, right?

15:13:38

19

MS. PINTADO: Correct.

15:13:40

20

MS. HOUCK: Okay. Thanks.

15:13:40

21

(Exhibit 15, Screenshot - Courtesy Getty

15:13:40

22

Images, was marked for identification and is

15:13:40

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CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum

Conducted on January 20, 2022

125

1	attached to the transcript.)	15:13:45
2	AV TECHNICIAN: Exhibit 15.	15:13:45
3	BY MS. PINTADO:	15:13:47
4	Q And is this the same statement that you --	15:13:47
5	What is this document? I'm sorry.	15:13:57
6	A I have no idea what that document is.	15:14:00
7	Q Okay. That's fair.	15:14:01
8	Just looking at the text, do you remember	15:14:03
9	if you wrote that?	15:14:09
10	A It's the same statement I -- you showed me	15:14:10
11	before.	15:14:14
12	Q Okay. Thanks. And going back to --	15:14:14
13	actually, I don't think that's necessary.	15:14:25
14	But I'll just say -- I'll represent to you	15:14:28
15	that this was with the article that was published	15:14:28
16	online in People magazine.	15:14:31
17	A (Nonverbal response.)	15:14:36
18	Q And so they -- you sent the statement to	15:14:36
19	them as well? Is that your belief, or did --	15:14:38
20	A I can't recall specifically, but I would	15:14:45
21	assume that I sent this at the same time I sent it	15:14:46
22	to -- on the same date I sent it to E! News, so...	15:14:49

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CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum

Conducted on January 20, 2022

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1	Just because they posted it in this	15:14:54
2	article doesn't mean I sent it for this article.	15:14:56
3	Q Okay.	15:14:59
4	MS. PINTADO: All right. Let's look at	15:15:03
5	22.	15:15:07
6	(Exhibit 16, Chain of e-mails dated	15:15:07
7	8/16/16, Bates No. BAUM0000401, was marked for	15:15:07
8	identification and is attached to the transcript.)	15:15:10
F/A 9	AV TECHNICIAN: Exhibit 16.	15:15:10
10	Q Do you recognize this document, Ms. Baum?	15:15:23
11	A I don't remember the document at all, but	15:15:35
12	I remember the -- the statement.	15:15:47
13	Q And this is your e-mail, correct --	15:15:48
14	A Yes.	15:15:53
15	Q -- robin@slate-pr?	15:15:55
16	And you sent this e-mail?	15:15:58
17	A Apparently, yes.	15:16:00
18	Q And how did you come up with this	15:16:02
19	statement?	15:16:09
20	A That statement was not something that I	15:16:11
21	wrote.	15:16:17
22	That statement was worked on by the	15:16:19

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CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum
Conducted on January 20, 2022

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1 lawyers from both parties, and it was the agreed 15:16:25
2 statement that was then passed along to myself 15:16:32
3 and, I'm assuming, Ms. Heard's publicist to send 15:16:36
4 out. 15:16:44

H,FSPK 5 Q And it says here: Neither party has made 15:16:45
6 false accusations for financial gain. 15:16:49

7 Do you see that? 15:16:52

8 A I do see that. 15:16:52

9 Q Is that true, to your knowledge? 15:16:54

10 MR. PRESIADO: Objection; lacks 15:16:58
11 foundation, calls for speculation. 15:16:59

12 THE WITNESS: I did -- I did -- I did -- 15:17:02

H,FSPK 13 once again, I did not write this statement, so -- 15:17:05

14 Q But you forwarded it -- 15:17:07

15 A -- I don't have an opinion. 15:17:09

16 Q -- correct? You forwarded this to -- 15:17:10

17 A Yes, I did. 15:17:13

18 Q -- David Ng at the L.A. Times? 15:17:13

19 A Yup. 15:17:17

20 Q And you had no idea whether it was true or 15:17:18

21 not? 15:17:21

22 MR. PRESIADO: Objection; misstates 15:17:22

CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum

Conducted on January 20, 2022

128

1	testimony, lacks foundation --	15:17:23
H, FSPK 2	THE WITNESS: I received the statement --	15:17:28
3	MR. PRESIADO: -- calls for speculation.	15:17:29
H, FSPK 4	THE WITNESS: -- from their -- the	15:17:30
5	lawyers.	15:17:32
6	BY MS. PINTADO:	15:17:32
H, FSPK 7	Q So did you assume it was true?	15:17:32
8	MS. HOUCK: Objection; relevance.	15:17:40
9	MR. PRESIADO: Objection; relevance, lacks	15:17:42
10	foundation.	15:17:44
11	THE WITNESS: I mean, you're making me	15:17:44
12	assume something.	15:17:46
H, FSPK 13	Q I'm just asking if you did or not. Did it	15:17:47
14	matter whether it was true, for you to forward it	15:17:49
15	to the L.A. Times?	15:17:52
16	MR. PRESIADO: Objection; vague and	15:17:56
17	ambiguous.	15:17:57
H, FSPK 18	THE WITNESS: Well, yes. I mean, I	15:17:57
19	don't -- I don't like to -- I don't -- I don't	15:18:02
20	knowingly send out misinformation.	15:18:06
21	Q Okay. So at the time you sent this, you	15:18:08
22	had no reason to believe that this was false --	15:18:12

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Transcript of Robin Baum
Conducted on January 20, 2022

129

FSPK	1	A Correct.	15:18:14
	2	Q -- what you wrote?	15:18:16
	3	MR. PRESIADO: Objection; calls for	15:18:18
	4	speculation, lacks foundation, relevance.	15:18:19
	5	MS. PINTADO: You can take this down.	15:18:23
FSPK	6	Q Were you working with any crisis PR teams	15:18:24
	7	or agents during this time, during May of 2016?	15:18:29
	8	A Yes.	15:18:34
	9	MS. HOUCK: Objection; compound.	15:18:36
	10	Q Can you repeat your answer, please.	15:18:38
FSPK	11	A Yes.	15:18:42
	12	Q What is a crisis PR team?	15:18:43
	13	A They help manage the situation and advise.	15:18:47
	14	They're -- they're -- they're -- they're --	15:19:00
	15	they're experts in dealing with situations that	15:19:06
	16	are deemed crisis.	15:19:10
	17	Q Was this situation --	15:19:11
	18	A I'm not a crisis publicist.	15:19:14
	19	Q Okay. Was this situation deemed a crisis?	15:19:19
	20	A I -- I think "crisis" is used broadly. I	15:19:22
	21	think this was a situation that needed attention	15:19:29
	22	from somebody who knew best how to navigate.	15:19:34

CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum

Conducted on January 20, 2022

130

FSPK	1	Q And a crisis PR team was the best to	15:19:39
	2	navigate that situation; isn't that right?	15:19:46
	3	A That's what the team -- I don't know	15:19:48
	4	who -- who made the ultimate decision, but it was	15:19:51
	5	the lawyers who recommended the crisis person.	15:19:54
	6	Q Who was the crisis person?	15:19:57
	7	A I'm going to say -- I have to look up her	15:19:59
	8	name. Judy Smith, I believe.	15:20:05
	9	Q And were you working hand in hand with	15:20:09
	10	her?	15:20:14
	11	A I -- yeah, I was -- I was involved with	15:20:16
	12	all the -- on all the calls with her and the	15:20:20
	13	attorneys. I -- I can't describe what she did;	15:20:23
	14	that had nothing to do with me.	15:20:28
	15	Q Do you know why the crisis team was	15:20:30
	16	brought in for this?	15:20:37
	17	MS. HOUCK: Objection; asked and answered.	15:20:40
	18	THE WITNESS: I think you'd have to ask	15:20:44
	19	the lawyers.	15:20:45
	20	Q So you don't know?	15:20:49
	21	A Well, I just don't want to speculate why	15:20:50
	22	they thought.	15:20:55

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Transcript of Robin Baum

Conducted on January 20, 2022

131

H	1	Q Did you weigh in at all as to whether it	15:20:57
	2	was a crisis?	15:21:00
	3	A No. I was told that they were hiring a	15:21:01
	4	crisis person, and -- they probably thought it was	15:21:05
	5	a good idea.	15:21:09
	6	Q Who told you that?	15:21:10
	7	A The lawyers.	15:21:11
	8	Q Okay. Around this time how many people	15:21:15
	9	would you say were working on Mr. Depp's public	15:21:17
	10	relations?	15:21:20
	11	MS. HOUCK: Around what time?	15:21:24
	12	MS. PINTADO: May 2016.	15:21:26
	13	THE WITNESS: You mean how many people	15:21:27
	14	were weighing in on what was happening --	15:21:29
	15	Q Yes.	15:21:34
	16	A -- or what was being discussed?	15:21:36
	17	Q Sure.	15:21:37
	18	A I'd be guessing because I can't remember	15:21:46
	19	everyone. But the -- Tracey Jacobs, myself, the	15:21:48
	20	lawyers, the crisis PR person, Christi Dembrowski.	15:21:53
	21	Q Anyone else in your firm working on this?	15:22:02
	22	A No. No one at my firm worked on Johnny	15:22:05

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Transcript of Robin Baum

Conducted on January 20, 2022

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1	but me.	15:22:09
2	Q Okay. Were there any other firms? You	15:22:11
3	said there was a U.K. firm.	15:22:13
4	A That was after the fact.	15:22:15
5	Q After what fact?	15:22:20
6	A That was later on. That was -- that was	15:22:21
7	at a different time, different, yeah, time.	15:22:24
8	MS. PINTADO: All right. Let's take a	15:22:27
9	ten-minute break.	15:22:29
10	And, also, can I get the time as well.	15:22:29
11	THE VIDEOGRAPHER: Off the record at 3:22.	15:22:36
12	(Lunch recess was held.)	16:12:10
13	THE VIDEOGRAPHER: We are back on the	16:12:10
14	record at 4:12.	16:12:10
15	BY MS. PINTADO:	16:12:13
16	Q Ms. Baum?	16:12:17
17	A Yes.	16:12:18
18	Q I will remind you that you are under oath,	16:12:19
19	and I'm going to ask you: Did you ever have a	16:12:21
20	personal relationship with Mr. Depp?	16:12:24
21	A No.	16:12:27
22	MS. HOUCK: Objection; vague and	16:12:28

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Transcript of Robin Baum

Conducted on January 20, 2022

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1	ambiguous.	16:12:30
2	THE WITNESS: A personal -- what do you	16:12:31
3	mean by "personal"?	16:12:33
4	BY MS. PINTADO:	16:12:33
5	Q Outside of your professional relationship,	16:12:33
6	did you have a romantic relationship with	16:12:35
7	Mr. Depp?	16:12:39
8	A No.	16:12:39
9	Q Were you friends with Mr. Depp outside of	16:12:39
10	your personal -- professional relationship?	16:12:44
11	A I mean, I'm, quote, friends with --	16:12:46
12	friendly with all my clients. I mean, we've had	16:12:53
13	dinners outside of work with other people. But	16:12:56
14	not friends, not one on one.	16:12:59
15	Q Have you had dinners alone?	16:13:01
16	A Nope.	16:13:03
17	Q You were in -- in Toronto you were in the	16:13:04
18	hotel room with Mr. Depp alone; is that correct?	16:13:11
19	A No; probably one of the assistants was	16:13:14
20	around or security.	16:13:20
21	Q Do you remember who was around?	16:13:21
22	A No. But rarely was I ever alone, one on	16:13:25

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Transcript of Robin Baum
Conducted on January 20, 2022

134

1	one.	16:13:33
2	Q So outside of your professional	16:13:34
3	relationship, you did not socialize?	16:13:38
4	A I have had dinners with him, Stephen	16:13:40
5	Deuters, Christian Carino, people -- other people,	16:13:44
6	but not one -- never outside of a group where I	16:13:49
7	was invited to join them.	16:13:53
8	Q Okay.	16:13:54
9	MS. PINTADO: Let's look at 25.	16:14:00
10	AV TECHNICIAN: Stand by.	16:14:13
11	(Exhibit 17, Chain of e-mails dated	16:14:13
12	2/27/20, Bates No. BAUM001820, was marked for	16:14:13
13	identification and is attached to the transcript.)	16:14:29
F/A 14	AV TECHNICIAN: Exhibit 17.	16:14:29
15	Q And I'll give you a moment to look at this	16:14:31
16	document, Ms. Baum.	16:14:33
17	A Does it go beyond the front page?	16:14:35
18	Q It does not. It's just one page.	16:14:37
19	A Okay.	16:14:52
20	Q Okay. Do you remember this document?	16:14:53
21	A I remember getting statements from Adam to	16:14:55
22	send out.	16:15:06

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Transcript of Robin Baum

Conducted on January 20, 2022

135

H, F/A,
FSPK

1

Q Okay. And is this your e-mail?

16:15:07

2

A Yes.

16:15:12

3

MR. PRESIADO: Objection; vague and

16:15:17

4

ambiguous. There's three e-mails there.

16:15:19

5

MS. PINTADO: It's all one chain, so...

16:15:22

H, F/A,
FSPK

6

Q Is this you in this e-mail chain,

16:15:26

7

robin@slate-pr.com?

16:15:29

8

A Yes.

16:15:30

9

Q And on February 6, 2020, you -- who did

16:15:31

10

you send this Adam Waldman statement to?

16:15:38

11

A I mean, here it says it went to Kenzie

16:15:42

12

Bryant.

16:15:48

13

Q And who is Kenzie Bryant?

16:15:51

14

A I mean, from the e-mail it looks like she

16:15:53

15

works at Condé Nast or he works at Condé Nast. I

16:16:00

16

have no idea.

16:16:05

17

Q Does Condé Nast own Vanity Fair?

16:16:06

18

A Yes.

16:16:09

19

Q Okay. And is it fair to say that this

16:16:09

20

statement was in response to the link -- the

16:16:16

21

article that's linked to here, vanityfair.com/

16:16:20

22

johnny-depp-lawsuit- -- lawsuits-text-messages?

16:16:26

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CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum

Conducted on January 20, 2022

136

1	MR. PRESIADO: Objection; calls for	16:16:28
2	speculation, lacks foundation, hearsay.	16:16:29
3	MS. PINTADO: It's her e-mail, so...	16:16:32
4	THE WITNESS: Yeah, I mean, I -- I	16:16:34
H, F/A, 5	would -- I mean, I would assume that it -- it's --	16:16:36
FSPK 6	that's why that link is there.	16:16:40
7	BY MS. PINTADO:	16:16:42
H, F/A, 8	Q Okay. And it says here: What does The	16:16:42
FSPK 9	Sun do to keep Amber Heard's hoax alive?	16:16:51
10	Do you see that?	16:16:54
11	A Yes.	16:16:56
12	Q And you received this statement from	16:16:57
13	Mr. Waldman?	16:17:02
14	A Yes.	16:17:03
15	Q And how did you receive statements? When	16:17:05
16	you received statements from Mr. Waldman, did	16:17:12
17	they -- did he send them via e-mail or did he send	16:17:15
18	them via text?	16:17:18
19	MS. HOUCK: Objection; vague and ambiguous	16:17:19
20	and -- that's it.	16:17:25
21	MS. PINTADO: Okay. Let's -- let's move	16:17:26
22	on. Thanks.	16:17:28

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Transcript of Robin Baum
Conducted on January 20, 2022

137

1	MR. PRESIADO: Also assumes facts not in	16:17:28
2	evidence.	16:17:28
3	BY MS. PINTADO:	16:17:33
4	Q You can go ahead, Ms. Baum.	16:17:33
5	A Are you wanting me to answer that	16:17:35
6	question?	16:17:37
7	Q Yes.	16:17:38
H, FSPK 8	A I have no -- I mean, I -- probably a	16:17:38
9	combination.	16:17:42
10	Q Okay. And did you do anything to verify	16:17:43
11	statements of Adam Waldman when you received them?	16:17:49
12	A No. Adam Waldman gave me statements and	16:17:53
13	told me to send them from him so they say they're	16:17:58
14	from him.	16:18:04
H, FSPK 15	Q And when did you start -- when did Adam	16:18:05
16	Waldman start participating in the publicity of	16:18:13
17	Mr. Depp?	16:18:18
18	MR. PRESIADO: Objection; misstates	16:18:18
19	testimony, assumes facts not in evidence, vague	16:18:20
20	and ambiguous.	16:18:26
21	MS. HOUCK: Calls for speculation.	16:18:26
22	MR. PRESIADO: Join.	16:18:28

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Transcript of Robin Baum
Conducted on January 20, 2022

138

FSPK	1	THE WITNESS: I don't know. I don't know	16:18:29
	2	exactly. I couldn't give you a date or a year.	16:18:31
	3	BY MS. PINTADO:	16:18:33
FSPK	4	Q What was Mr. Waldman's role in publicity	16:18:33
	5	for Mr. Depp?	16:18:39
	6	MR. PRESIADO: Objection; calls for	16:18:41
	7	speculation, assumes facts not in evidence, lacks	16:18:43
	8	foundation.	16:18:47
	9	And, Ms. Baum, I would caution you in	16:18:48
	10	course -- of course, in con- -- in consult with	16:18:52
	11	your attorney, I would caution you not to divulge	16:18:55
	12	any communications you've had with Mr. Waldman,	16:19:00
	13	him being an attorney for Mr. Depp and you being	16:19:01
	14	an agent of Mr. Depp.	16:19:04
	15	MS. HOUCK: I concur.	16:19:05
	16	MR. PRESIADO: So if the question is posed	16:19:08
	17	and you can't -- and you believe you can't	16:19:10
	18	answer -- answer without divulging such	16:19:12
	19	communications, of course your attorney would have	16:19:14
	20	to instruct you not to answer. But as the	16:19:18
	21	attorney for Mr. Depp who holds the privilege, I	16:19:19
	22	would ask you not answer.	16:19:22

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CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum

Conducted on January 20, 2022

139

1	MS. PINTADO: And I would once again note	16:19:23
2	that there is no privilege that can be applied to	16:19:25
3	those communications. Ms. Baum is not an attorney	16:19:28
4	and is a third party.	16:19:32
5	So please go ahead and answer unless	16:19:33
6	you're directed not to, in which case we might	16:19:40
7	have to come back for another day.	16:19:42
8	MR. PRESIADO: And I don't agree with	16:19:44
9	that. But our position is on the record.	16:19:46
10	MS. HOUCK: Right. There is a dispute,	16:19:48
11	obviously, but we will respect the privilege	16:19:50
12	that's being held by Mr. Depp.	16:19:52
13	So can we have the question again.	16:19:54
14	THE REPORTER: Do you want me to read it	
15	back?	
16	MS. PINTADO: Yes, please.	
17	THE REPORTER: Stand by. What was the	
18	person's name? Wald-?	
19	MS. PINTADO: Waldman.	16:20:21
20	(The court reporter read the pertinent	16:20:21
21	part of the record.)	16:20:22
22	MR. PRESIADO: Same objections.	16:20:22

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CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum

Conducted on January 20, 2022

140

1 MS. PINTADO: And -- yeah. I understand 16:20:23
2 that those are standing objections. We don't need 16:20:24
3 to state them every time. 16:20:27

R, FSPK 4 THE WITNESS: Well, I could just say that 16:20:32
5 Adam Waldman was Johnny -- or was the -- Johnny's 16:20:33
6 attorney and provided me with statements. 16:20:37

7 BY MS. PINTADO: 16:20:43

R, FSPK 8 Q Would you say he had an active role in 16:20:43
9 publicity for Mr. Depp? 16:20:45

10 MR. PRESIADO: Objection -- 16:20:48

11 MS. HOUCK: Objection. 16:20:48

12 MR. PRESIADO: -- calls for speculation, 16:20:49
13 lacks foundation, assumes facts not in evidence, 16:20:50
14 vague and ambiguous. 16:20:53

15 MS. HOUCK: Join. 16:20:54

16 MR. PRESIADO: Also to the extent it calls 16:20:57
17 for a legal conclusion. 16:20:58

18 BY MS. PINTADO: 16:21:06

19 Q Ms. Baum, you can answer. 16:21:06

20 A I'm still confused. Am I supposed to 16:21:07
21 answer or not supposed to answer? 16:21:10

22 MS. HOUCK: Yes, you can answer. Unless I 16:21:13

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Transcript of Robin Baum
Conducted on January 20, 2022

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1	tell you, "Robin, don't answer that," I'm	16:21:15
2	instructing you not to answer. But I haven't done	16:21:18
3	that yet.	16:21:19
4	THE WITNESS: Okay.	16:21:20
5	MS. HOUCK: But with the cautionary piece	16:21:20
6	that we both have put on the record now, you can	16:21:22
7	answer the question to the extent you can.	16:21:26
8	THE WITNESS: Okay. So -- I'm sorry, I'm	16:21:27
9	going to ask you to repeat the question just so	16:21:32
10	I'm understanding it completely.	16:21:34
11	BY MS. PINTADO:	16:21:36
12	Q Would you say that Mr. Waldman had an	16:21:36
13	active role in Mr. Depp's publicity?	16:21:39
14	MR. PRESIADO: Objection; lacks	16:21:43
15	foundation, calls for --	16:21:44
16	MS. PINTADO: But --	16:21:44
17	MR. PRESIADO: -- speculation --	16:21:44
18	MS. PINTADO: -- we've already done that.	16:21:45
19	I'm just repeating the question for her.	16:21:47
20	MR. PRESIADO: -- assumes facts not --	16:21:48
21	MS. PINTADO: You can just say "same	16:21:50
22	objections." You're just taking up time.	16:21:51

CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum

Conducted on January 20, 2022

142

1	MR. PRESIADO: It's --	16:21:52
2	THE WITNESS: I would --	16:21:52
3	MR. PRESIADO: If it's read off the	16:21:53
4	record, I would be happy to do that. But you read	16:21:55
5	it -- or you stated a brand-new question. So --	16:21:57
6	MS. HOUCK: I think that's fair.	16:22:00
7	MR. PRESIADO: -- I will adopt my pre- --	16:22:01
8	MS. PINTADO: It's already been read off	16:22:03
9	the record now. I've stated it once. It's been	16:22:04
10	read off the record. Now I've stated it again,	16:22:07
11	but let's read it off the record again.	16:22:08
12	MS. HOUCK: Counsel, do you need a break?	16:22:10
13	Do we need a break?	16:22:12
14	MS. PINTADO: No. I'd like to read it off	16:22:13
15	the record and move forward.	16:22:15
16	MS. HOUCK: Okay. Great.	16:22:18
17	MS. PINTADO: You're taking up my time.	16:22:18
18	Thank you.	16:22:18
19	(Discussion held off the record.)	16:22:34
20	(The court reporter read the pertinent	16:22:34
21	part of the record.)	16:22:36
22	MR. PRESIADO: Objection; calls for	16:22:36

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Transcript of Robin Baum
Conducted on January 20, 2022

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1	speculation, lacks foundation, assumes facts not	16:22:38
2	in evidence, vague and ambiguous.	16:22:43
3	MS. HOUCK: Join.	16:22:45
R, FSPK 4	THE WITNESS: I would say that he was	16:22:46
5	involved.	16:22:49
6	BY MS. PINTADO:	16:22:51
R, FSPK 7	Q In what way was he involved?	16:22:51
8	MR. PRESIADO: Calls for speculation,	16:22:55
9	lacks foundation, assumes facts not in evidence.	16:22:56
R, FSPK 10	THE WITNESS: He had opinions.	16:23:02
11	MS. HOUCK: Join.	16:23:03
R, FSPK 12	Q And would -- if you disagreed with his	16:23:11
13	opinions, did his opinions override yours?	16:23:15
14	MR. PRESIADO: Objection; assumes facts	16:23:19
15	not in evidence, compound, vague and ambiguous.	16:23:21
16	MS. HOUCK: Join.	16:23:27
17	Q If you understand, you can answer,	16:23:28
18	Ms. Baum.	16:23:29
R, FSPK 19	A Yup.	16:23:29
20	MS. HOUCK: Incomplete hypothetical.	16:23:35
21	MR. PRESIADO: Actually, that requires	16:23:36
22	divulging of attorney-client communications, so I	16:23:38

CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum

Conducted on January 20, 2022

144

1 would assert the privilege and ask that she be 16:23:41
2 instructed not to answer that question. It 16:23:43
3 necessarily involves communications between her 16:23:46
4 and Mr. Waldman. 16:23:48

5 MS. HOUCK: Okay. Fair. I'll -- 16:23:50

6 Ms. Baum, I'm going to instruct you not to 16:23:52
7 answer that question. To the extent Ms. Pintado 16:23:53
8 can rephrase it so it doesn't implicate the 16:23:58
9 communications, then that's a different story. 16:24:00
10 But as it stands, I will instruct you not to 16:24:02
11 answer. 16:24:05

12 THE WITNESS: Okay. 16:24:05

13 BY MS. PINTADO: 16:24:06

14 Q Did you ever question -- to Mr. Depp, did 16:24:06
15 you ever question these statements that you were 16:24:19
16 putting out by Waldman? 16:24:22

17 MR. PRESIADO: Assumes facts not in 16:24:26
18 evidence, vague and ambiguous. 16:24:28

19 And, again, Ms. Baum, even though she's 16:24:32
O 20 asking you about communications between you and 16:24:34
21 Mr. Depp, if Mr. Waldman was involved in those 16:24:36
22 conversations, they remain privileged because he's 16:24:39

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Transcript of Robin Baum
Conducted on January 20, 2022

145

O	1	Mr. Depp's counsel. So if you could limit your	16:24:43
	2	answer, if you have one, to communications where	16:24:46
	3	Mr. Waldman was not involved.	16:24:50
	4	MS. HOUCK: I agree.	16:24:53
	5	THE WITNESS: You're saying I should	16:24:57
	6	limit -- repeat that last thing you said to me.	16:25:00
	7	MR. PRESIADO: Sure. So she's asking you	16:25:04
	8	about communications between you and Mr. Depp.	16:25:05
	9	THE WITNESS: Yeah.	16:25:06
	10	MR. PRESIADO: But if you had those	16:25:07
	11	communications with Mr. Waldman present, then	16:25:08
	12	they're privileged and I would ask you not to	16:25:10
	13	answer that.	16:25:11
	14	But if it's just between you and	16:25:12
	15	Mr. Depp -- if, in fact, those conversations were	16:25:14
	16	ever had -- please limit your answer to those	16:25:17
	17	conversations that did not include Mr. Waldman.	16:25:19
	18	THE WITNESS: Okay.	16:25:22
	19	I did not have conversations with	16:25:22
	20	Mr. Depp.	16:25:24
	21	BY MS. PINTADO:	16:25:25
	22	Q Did you ever disagree with any of the	16:25:25

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Transcript of Robin Baum
Conducted on January 20, 2022

146

1	statements that you were putting out from	16:25:39
2	Mr. Waldman?	16:25:42
3	MR. PRESIADO: And, again, Ms. Baum, if	16:25:44
4	that was a communication between you and	16:25:45
5	Mr. Waldman, I would --	16:25:47
6	MS. PINTADO: I'm not --	16:25:47
7	MR. PRESIADO: -- ask that you not answer	16:25:48
8	that.	16:25:49
9	MS. PINTADO: I'm not referring to	16:25:49
10	communications, for now, with Mr. Waldman --	16:25:51
11	MR. PRESIADO: That's not --	16:25:52
12	MS. PINTADO: -- although I object to	16:25:53
13	that.	16:25:54
14	MR. PRESIADO: Then you need to clarify	16:25:54
15	your question.	16:25:56
16	BY MS. PINTADO:	16:25:59
17	Q Ms. Baum, did you understand the question?	16:25:59
18	A I think you're asking me if I ever	16:26:03
19	objected to the statements. Are you asking me if	16:26:06
20	I objected to the statements or objected them --	16:26:10
21	to Adam Waldman?	16:26:13
22	Q Not -- not to Adam Waldman. Just, did you	16:26:17

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Transcript of Robin Baum
Conducted on January 20, 2022

147

H, FSPK	1	object to any of the statements?	16:26:19
	2	MR. PRESIADO: Objection; vague and	16:26:22
	3	ambiguous, assumes facts not in evidence.	16:26:24
	4	MS. HOUCK: And compound to the extent	16:26:27
	5	that it's multiple statements. I don't know which	16:26:28
	6	ones you're talking about.	16:26:32
	7	THE WITNESS: I -- I -- sorry. The words	16:26:34
	8	just flew out of my head.	16:26:47
	9	BY MS. PINTADO:	16:26:50
	10	Q Let --	16:26:50
H, FSPK	11	A I did -- I trusted Mr. Adam's direction --	16:26:51
	12	Mr. Waldman's direction.	16:27:00
	13	Q Were you asked by Mr. Depp to publish	16:27:02
	14	statements that Mr. Waldman gave to you?	16:27:11
	15	MR. PRESIADO: Again, Ms. Baum, I caution	16:27:15
O	16	you to not reveal any communications that	16:27:16
	17	Mr. Waldman was present or party to even though	16:27:20
	18	she's just asking you about you and Mr. Depp.	16:27:23
H, FSPK	19	THE WITNESS: I did not speak to Mr. Depp.	16:27:28
	20	Q Okay. And did you speak with Mr. Waldman	16:27:32
	21	about any of the statements that he was asking you	16:27:41
	22	to send to the press?	16:27:43

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Transcript of Robin Baum
Conducted on January 20, 2022

148

1	MR. PRESIADO: Objection; calls for	16:27:47
2	attorney-client communications.	16:27:49
3	And I would ask that you not answer that	16:27:50
4	question on -- since Mr. Depp asserts the	16:27:52
5	privilege as to that question.	16:27:54
6	MS. HOUCK: Join in the objection.	16:27:55
7	And I'll instruct you not to answer that,	16:27:56
8	Ms. Baum.	16:27:59
9	THE WITNESS: Okay.	16:28:03
10	MS. PINTADO: All right. Let's look at	16:28:06
11	27.	16:28:07
12	(Exhibit 18, Chain of e-mails dated	16:28:17
13	12/18/14, Bates Nos. BAUM0000404 through	16:28:17
14	BAUM0000409, was marked for identification and is	16:28:17
15	attached to the transcript.)	16:28:18
F/A 16	AV TECHNICIAN: Exhibit 18.	16:28:18
17	BY MS. PINTADO:	16:28:36
18	Q And this is BAUM 404 -- well, it starts as	16:28:36
19	that. It's a six-page document.	16:28:50
20	A A six-page. Okay.	16:28:52
21	Q And on this first page -- if you could --	16:28:56
22	if you could just read the first page for me	16:29:00

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Transcript of Robin Baum
Conducted on January 20, 2022

149

1 and -- or skim the document, and then let me know 16:29:02
2 if you understand -- or, sorry, recognize this 16:29:07
3 document. 16:29:11

4 A I can't move it down. 16:29:33

5 Q I'll do it for you. 16:29:37

6 A Thank you. 16:29:39

R,H, 7 Q Ms. Baum, what is this document? 16:29:56
FSPK

8 A Well, it's -- it's a letter from somebody 16:29:57

9 who works from -- at the National -- National 16:30:01

10 Enquirer, asking for comment. 16:30:04

11 Q And they're asking for a comment about a 16:30:08

12 story that Depp has turned his place into a "rehab 16:30:12

13 retreat"; isn't that right? 16:30:18

14 A Yeah, that's what it -- 16:30:20

15 MR. PRESIADO: Objection; the document 16:30:20

16 speaks for itself. 16:30:21

R,H, 17 THE WITNESS: Yeah, that's what the 16:30:21
FSPK

18 document says. 16:30:24

19 Q And this is December 18, 2014, correct? 16:30:25

20 A Correct. 16:30:27

21 Q And scrolling back up, Ms. Gonzalez at the 16:30:29

22 National Enquirer sends you an additional -- an 16:30:41

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Transcript of Robin Baum

Conducted on January 20, 2022

150

R, H,
FSPK

1 addition to the comment request sent earlier. 16:30:48
2 And you forward this e-mail -- these 16:30:51
3 e-mails from Ms. Gonzalez to Christi Dembrowski, 16:30:56
4 correct? 16:31:02
5 A Yeah, that's what it looks like. 16:31:03
6 Q Did you not want to respond to this press 16:31:06
7 inquiry? 16:31:13
8 A Well, I don't -- I don't recall whether I 16:31:13
9 did or I did not, but I don't make a habit of 16:31:18
10 responding on any of my clients' behalf to the 16:31:24
11 National Enquirer. 16:31:29
12 Q Was it true that Depp was in rehab? 16:31:31

13 MR. PRESIADO: Objection; calls for -- 16:31:35
14 lacks foundation, calls for speculation. 16:31:37

R, H,
FSPK

15 THE WITNESS: I don't know. 16:31:41
16 Q And why did you forward it to 16:31:41
17 Ms. Dembrowski? 16:31:54
18 A At the time, I included her in everything. 16:31:55
19 Q Why is that? 16:32:03
20 A Well, she was -- she was my partner who I, 16:32:04
21 you know, worked on -- for years on Johnny's 16:32:10
22 behalf. 16:32:15

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Transcript of Robin Baum
Conducted on January 20, 2022

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VA

1	Q So at this time, at least, in December of	16:32:16
2	2014, you were working as a partner with	16:32:24
3	Ms. Dembrowski?	16:32:31
4	MS. HOUCK: Objection; lacks foundation,	16:32:31
5	assumes facts --	16:32:33
6	MR. PRESIADO: Also misstates testimony.	16:32:33
7	Q You can answer, Ms. Baum.	16:32:37
8	A I -- yeah, I mean, I -- I -- yes, I worked	16:32:38
9	with Christi.	16:32:45
10	Q Okay.	16:32:47
11	THE WITNESS: Can I -- excuse me. Can I	16:32:52
12	pause for one second? It's just that the sun has	16:32:54
13	changed and it's very bright and I'm having a hard	16:32:56
14	time seeing, so...	16:32:58
15	Okay. Thank you.	16:33:01
16	MS. PINTADO: Okay.	16:33:05
17	Let's pull up 28.	16:33:06
18	(Exhibit 19, Chain of e-mails dated	16:33:12
19	3/11/15 and 3/12/15 with attachments, Bates Nos.	16:33:12
20	BAUM0000661 through BAUM0000683, was marked for	16:33:12
21	identification and is attached to the transcript.)	16:33:12
22	AV TECHNICIAN: Exhibit 19.	16:33:12

CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum

Conducted on January 20, 2022

152

1	BY MS. PINTADO:	16:33:29
2	Q Okay. And I will scroll through it. It's	16:33:29
3	23 pages.	16:33:35
4	A Sorry.	16:33:40
5	Q Are you -- let me know when I'm -- I can	16:33:40
6	scroll.	16:33:43
7	A You can scroll.	16:33:43
8	Q I'm going to go back up to the top of this	16:33:44
9	document. If you need to review any other parts	16:34:08
10	of it, let me know.	16:34:11
11	A Okay.	16:34:13
H, FSPK 12	Q Do you recognize this document?	16:34:13
13	A Yes.	16:34:16
14	Q What is it?	16:34:18
15	A It was a document that the unit publicist	16:34:20
16	on the film had -- an e-mail that the unit	16:34:26
17	publicist from the film had sent to me.	16:34:32
18	Q So Michael Singer is the publicist on the	16:34:34
19	film?	16:34:38
20	A Yes. He worked for Jerry Bruckheimer.	16:34:38
21	Q Okay. And what company was that?	16:34:44
22	And I apologize for the sirens in the	16:34:49

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Transcript of Robin Baum
Conducted on January 20, 2022

153

1 background. 16:34:51

H, FSPK 2 A Jerry Bruckheimer was the producer -- is 16:34:51

3 the producer of the Pirates movies, and Michael 16:34:54

4 did all the -- we call him unit publicist. He did 16:35:00

5 the -- the press during production. He handled 16:35:05

6 the press, overlooked the press. 16:35:06

7 Q So do you have a close working 16:35:08

8 relationship with Mr. Singer? 16:35:11

9 A Yes, I did. 16:35:12

10 Q And he says, The story below is on Daily 16:35:16

11 Mail Australia's website, which means it will go 16:35:27

12 out on the Mail's other international sites. It's 16:35:29

13 more than likely that local and other media will 16:35:31

14 contact me for comment or con- -- confirmation. 16:35:34

15 Do you see that? 16:35:36

16 A Uh-huh. 16:35:36

17 Q And it says, I will make none unless 16:35:39

18 advised otherwise by you. 16:35:41

19 Do you see that? 16:35:43

20 A Yup. 16:35:44

21 Q Sorry. I'll just scroll down a bit. 16:35:44

H, FSPK 22 Here it says, The actor is rumored to have 16:35:59

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Transcript of Robin Baum

Conducted on January 20, 2022

154

H, FSPK	1	broken his right wrist go-karting on a private	16:36:03
	2	track.	16:36:07
	3	Do you see that? Were you aware of any	16:36:07
	4	go-karting incident?	16:36:10
	5	A I remember the story. I don't re- --	16:36:11
	6	remember anything more than remembering the story.	16:36:14
	7	Q Mr. Depp never had a go-karting incident,	16:36:22
	8	did he?	16:36:25
	9	MS. HOUCK: Objection; calls for	16:36:25
	10	speculation.	16:36:31
	11	MR. PRESIADO: Join.	16:36:31
H, FSPK	12	THE WITNESS: I can't answer that. I	16:36:32
	13	don't know.	16:36:35
	14	Q Did you ever go to Australia with	16:36:40
	15	Mr. Depp?	16:36:44
	16	A No.	16:36:44
	17	MS. PINTADO: All right. Let's look at	16:36:53
	18	Exhibit 30. Actually, sorry, scratch that.	16:36:56
	19	Let's look at 31.	16:37:00
	20	(Exhibit 20, E-mail dated 9/4/15, Bates	16:37:00
	21	Nos. BAUM000985 through BAUM000988, was marked for	16:37:00
	22	identification and is attached to the transcript.)	16:37:22

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Transcript of Robin Baum
Conducted on January 20, 2022

155

1 AV TECHNICIAN: Exhibit 20. 16:37:22

2 BY MS. PINTADO: 16:37:33

H, FSPK 3 Q Okay. And I'm going to scroll through 16:37:33

4 this one as well. So this appears to be an e-mail 16:37:35

5 from Mr. Deuters to you, Ms. Dembrowski -- I'm 16:37:40

6 sorry, Ms. Baum -- 16:37:44

7 A Yeah. 16:37:45

8 Q -- cc'ing Ms. Dembrowski. And scrolling 16:37:45

9 down, it has an attachment that's JD's speech. 16:37:52

10 Are you familiar with this document? 16:37:58

11 A I don't know what this speech was for. 16:38:00

12 Q Are you familiar with this document? 16:38:04

13 A No. I'm familiar with Stephen Deuters and 16:38:10

14 him sending me speeches, but I don't recall this 16:38:15

15 one -- 16:38:18

16 Q Okay. 16:38:19

H, FSPK 17 A -- yet. 16:38:20

18 Q Okay. I'll give you a second to look at 16:38:20

19 it. Maybe it refreshes your recollection. 16:38:24

20 A You can go lower. 16:38:38

21 Keep going. 16:39:23

22 Keep going. 16:39:46

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CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum
Conducted on January 20, 2022

156

1 Okay. 16:39:48

FSPK

2 Q Do you remember this little -- 16:39:49

3 A I just want to look at the date. 16:39:50

4 Q September 4, 2015. 16:39:55

5 A I want -- I -- I'm -- I want to say that 16:40:03

6 this was somehow associated with -- with something 16:40:07

7 he was going to receive in Venice, but he didn't 16:40:16

8 use the speech. 16:40:21

SP

9 Q Do you know why not? 16:40:22

10 MR. PRESIADO: Objection; calls for 16:40:24

11 speculation, lacks foundation. 16:40:25

12 MS. HOUCK: Join. 16:40:27

13 THE WITNESS: I mean, I guess I would be 16:40:37

14 speculating. I -- I don't fully recall. But I -- 16:40:38

15 I -- I recall not -- this -- this -- this was not 16:40:42

16 used. 16:40:48

17 Q Here it says, My wife has been called in 16:40:50

18 the press by a so-called journalist everything 16:41:01

19 from a 'gold-digger' to a 'home-wrecker'... How 16:41:04

20 fucking dare anyone who calls themselves a 16:41:07

21 journalist write something as cruel as this? 16:41:10

22 Do you -- have you heard Mr. Depp refer to 16:41:14

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Transcript of Robin Baum

Conducted on January 20, 2022

157

1	Amber as a "gold digger"?	16:41:22
2	A That I heard directly from him?	16:41:24
3	Q Yes.	16:41:40
4	A I -- I don't recall.	16:41:45
5	Q Did you have any input into this speech?	16:41:47
6	Did you provide any input?	16:41:56
7	A To this written speech?	16:41:57
8	Q Yes.	16:42:00
9	A No.	16:42:01
10	Q Did you ever provide input on Mr. Depp's	16:42:02
11	speeches?	16:42:06
12	A No.	16:42:07
13	Q Okay.	16:42:10
14	MS. PINTADO: Let's look at -- let's look	16:42:13
15	at 32.	16:42:25
16	(Exhibit 21, Chain of e-mails dated	16:42:29
17	2/12/16 with attachment, Bates Nos. BAUM0000358	16:42:29
18	through BAUM0000363, was marked for identification	16:42:29
19	and is attached to the transcript.)	16:42:44
F/A 20	AV TECHNICIAN: Exhibit 21.	16:42:44
21	Q I'm scrolling down.	16:43:02
22	A Can I -- wait, can you go back up to the	16:43:06

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Transcript of Robin Baum

Conducted on January 20, 2022

158

1 date. Okay. I see. 16:43:08

H,FSPK 2 Q Okay. Do you recognize this document? 16:43:17

3 A Yeah. I -- yeah, I vaguely -- vague- -- I 16:43:19

4 do remember this document. But can you -- I'm 16:43:24

5 sorry, can you go back down to the first paragraph 16:43:26

6 of Marty Singer's... 16:43:30

7 Q Yes. 16:43:34

8 A Yeah. I just want to see something. 16:43:35

H,FSPK 9 Honestly, I don't remember this one. I 16:43:46

10 remember other ones. I don't remember this 16:43:49

11 particular one. 16:43:52

12 Q What do you mean, you "don't remember 16:43:52

13 this" -- 16:43:55

14 A I remember other letters from Marty 16:43:56

15 Singer. I don't remember this specifi- -- this 16:43:58

16 particular one. 16:44:03

17 Q Okay. But this is your e-mail, correct? 16:44:03

18 A Yup. 16:44:04

19 Q Okay. And you received this attachment, 16:44:06

20 correct, this attached letter? 16:44:10

H,FSPK21 A Yes. I mean, I see that I -- he e-mailed 16:44:13

22 it to all of the people on the e-mail and then I 16:44:18

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Transcript of Robin Baum
Conducted on January 20, 2022

159

R, H, FSPK	1	forwarded it.	16:44:20
	2	Q And you forwarded it to Ms. Dembrowski,	16:44:21
	3	correct?	16:44:24
	4	A Yes.	16:44:25
	5	Q Okay. And had -- was there negative press	16:44:26
	6	about Mr. Depp cheating on Amber -- I mean, sorry,	16:44:35
	7	on Vanessa Paradis?	16:44:39
R, H, FSPK	8	A I don't recall this timing or this -- this	16:44:42
	9	particular press response.	16:44:55
	10	Q Just -- was there negative press about	16:45:07
	11	Mr. Depp cheating on Amber -- sorry, cheating on	16:45:08
	12	Vanessa --	16:45:14
	13	A I guess -- I don't -- I just don't	16:45:15
	14	remember if there was press specifically about	16:45:16
	15	that.	16:45:20
	16	Q Okay.	16:45:31
	17	MS. PINTADO: Let's look at 37.	16:45:31
	18	(Exhibit 22, Chain of e-mails dated	16:45:31
	19	3/17/15 with Courier Mail article, Bates Nos.	16:45:31
	20	BAUM0000461 and BAUM0000462, was marked for	16:45:31
	21	identification and is attached to the transcript.)	16:45:40
R, H, FSPK	22	AV TECHNICIAN: Exhibit 22.	16:45:40

CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum

Conducted on January 20, 2022

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R,H, FSPK	1	Q Ms. Baum, do you recognize this document?	16:45:52
	2	A I rec- -- I mean, I recognize the	16:46:13
	3	document.	16:46:22
	4	Q And what was this document about?	16:46:24
	5	MS. HOUCK: Objection; the document speaks	16:46:34
	6	for itself.	16:46:35
	7	MR. PRESIADO: Same objection.	16:46:36
R,H, FSPK	8	THE WITNESS: I mean, I only know what the	16:46:37
	9	document -- what the e-mail is about because I'm	16:46:41
	10	looking at the document. Clearly, it's on -- some	16:46:45
	11	story about Pirates 5 being on hold.	16:46:51
	12	Q Okay. And it -- I'll represent that that	16:46:53
	13	word missing is "battles." This is your document,	16:46:58
	14	but I believe that was "battles."	16:47:03
R,H, FSPK	15	It says, Pirates 5 on hold as Johnny Depp	16:47:07
	16	battles addiction.	16:47:10
	17	And you write, If the headline is not	16:47:12
	18	correct do we try to get the paper to print a	16:47:17
	19	retraction?	16:47:19
	20	Is that right? Did you write that?	16:47:20
	21	A Yes. Yeah. I mean, it's there.	16:47:23
	22	Q Was this not -- was this incorrect, this	16:47:26

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CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum
Conducted on January 20, 2022

161

FSPK	1	headline?	16:47:29
	2	A If I wrote that it was incorrect, then it	16:47:29
	3	was incorrect.	16:47:37
	4	Q Was Pirates 5 not on hold because Johnny	16:47:38
	5	Depp was not battling an addiction? Let me	16:47:43
	6	rephrase that.	16:47:47
FSPK	7	Was Pirates 5 on hold at any point that	16:47:48
	8	you're aware of?	16:47:51
	9	A The -- I don't know about on hold or not	16:47:51
	10	on hold. I don't -- I don't know what -- how	16:47:56
	11	production deemed it. But, obviously, he -- he	16:48:02
	12	went back to the States to deal with his finger	16:48:05
	13	and came back. That's the only "on hold" that I	16:48:10
	14	can recall.	16:48:13
	15	Q And was Mr. Depp battling addiction at the	16:48:16
	16	time, to your knowledge?	16:48:26
	17	MR. PRESIADO: Objection; lacks	16:48:28
	18	foundation, calls for speculation.	16:48:29
	19	MS. HOUCK: Join.	16:48:30
	20	THE WITNESS: Not that I -- I'm not aware.	16:48:31
	21	Q What do you understand happened to	16:48:38
	22	Mr. Depp's finger?	16:48:42

CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum

Conducted on January 20, 2022

162

1	MR. PRESIADO: Objection; lacks	16:48:45
2	foundation, calls for speculation.	16:48:46
3	MS. HOUCK: Join.	16:48:49
4	THE WITNESS: You're asking me what I	16:48:51
5	know? What I know, what I think I know? I	16:48:56
6	don't -- what's the question?	16:49:00
7	BY MS. PINTADO:	16:49:01
8	Q Did Mr. Depp have a conversation with you	16:49:01
9	about his finger?	16:49:04
10	A I don't think I ever had a conversation	16:49:05
11	with him directly --	16:49:10
12	Q What did you --	16:49:15
13	A -- about his finger other than seeing it	16:49:16
14	postsurgery.	16:49:20
15	Q When did you see his finger postsurgery?	16:49:22
16	A I guess the next time I saw him for press.	16:49:26
17	Q And did you ask him what had happened?	16:49:30
18	A No.	16:49:33
19	Q What did you understand had happened?	16:49:35
20	MR. PRESIADO: Objection; lacks	16:49:53
21	foundation, calls for hearsay.	16:49:54
22	MS. HOUCK: Join.	16:49:58

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CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum
Conducted on January 20, 2022

163

1 THE WITNESS: Are you waiting for me? 16:50:05

2 Q Yes, I am. 16:50:06

3 A I was -- I heard that a bottle was thrown 16:50:08

4 at him, and it cut the top of his finger. 16:50:13

5 Q Who did you hear that from? 16:50:16

6 A I can't recall. 16:50:17

7 Q Was it someone on Mr. Depp's team? 16:50:19

8 A I can't -- I don't want to assume. I 16:50:26

9 don't recall. 16:50:31

10 MS. PINTADO: All right. Let's look at 16:50:37

11 39. 16:50:39

12 (Exhibit 23, Chain of e-mails dated 16:50:39

13 5/27/16 and 5/29/16, Bates No. BAUM0000611, was 16:50:39

14 marked for identification and is attached to the 16:50:39

15 transcript.) 16:50:40

F/A, H, 16 AV TECHNICIAN: Exhibit 23. 16:50:41

FSPK

17 Q Do you recognize this document, Ms. Baum? 16:50:55

18 It's one page. 16:51:12

19 A I don't remember this document. 16:51:14

20 Q Who is Stephanie Marcus? 16:51:17

21 A I mean, it says she's an entertainment 16:51:20

22 reporter from the Huntington -- Huffington Post, 16:51:25

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CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum

Conducted on January 20, 2022

164

FSPK	1	but I don't -- I don't know her --	16:51:29
	2	Q But she's e-mailing you --	16:51:30
	3	A -- or remember her.	16:51:31
	4	Q She's e-mailing you here, correct, on	16:51:32
	5	May 27, 2016?	16:51:35
	6	A Yes. Yes.	16:51:38
	7	Q And -- and you respond, correct?	16:51:39
	8	A Yes, I responded.	16:51:41
	9	Q Okay. And she e-mails you, she says she's	16:51:44
	10	reaching out regarding the restraining order Amber	16:51:48
	11	Heard is seeking against Johnny Depp.	16:51:52
	12	And you respond: Are you around for a	16:51:53
	13	quick off the record conversation?	16:51:56
	14	Do you see that?	16:51:58
	15	A Yes.	16:51:58
	16	Q What did you talk to -- did you talk to	16:51:59
	17	Ms. Marcus after this -- after you sent this?	16:52:04
	18	A I have no recollection at all if I ever	16:52:06
	19	even spoke to her.	16:52:10
	20	Q Why would you have an off-the-record	16:52:11
	21	conversation?	16:52:16
	22	MR. PRESIADO: Objection; calls for	16:52:17

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CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum
Conducted on January 20, 2022

165

1 speculation, lacks foundation. 16:52:19

2 MS. HOUCK: Join. 16:52:22

F/A, 3 Q Why would you -- 16:52:23
FSPK

4 A I don't remember. 16:52:24

5 Q -- ask -- why would you ask for a quick 16:52:24

6 off-the-record conversation about Amber Heard's 16:52:29

7 restraining order? 16:52:31

8 MR. PRESIADO: Same objections. 16:52:32

F/A, 9 THE WITNESS: I don't remember this, so I 16:52:35
FSPK

10 can't answer that question. 16:52:37

11 Q Okay. 16:52:38

12 MS. PINTADO: Let's look at 40. 16:52:44

13 AV TECHNICIAN: Sorry, Counsel, did you 16:53:18

14 say 40? 16:53:20

15 MS. PINTADO: Yes. 16:53:21

16 (Exhibit 24, Chain of e-mails dated 16:53:24

17 6/2/16, Bates No. BAUM 0000541, was marked for 16:53:24

18 identification and is attached to the transcript.) 16:53:24

F/A, 19 AV TECHNICIAN: 24. 16:53:24
FSPK

F/A, 20 Q Okay. This is another one-page e-mail 16:53:39
FSPK

21 exchange. It's Baum 541. 16:53:42

22 Do you recognize this document? 16:53:45

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CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum

Conducted on January 20, 2022

166

R,H,
FSPK

1

A I mean, I recognize it's from me. I don't

16:53:47

2

remember it.

16:53:52

3

Q On June 2, 2016, Christi Dembrowski wrote

16:53:53

4

to you, correct?

16:54:01

5

A Okay.

16:54:06

R,H,
FSPK

6

Q Okay. And you responded: She is so

16:54:28

7

gross. More so because we know she has said that.

16:54:34

8

She's awful. Can't wait to kill her -- I can't

16:54:36

9

wait to kill her -- till we kill her in court.

16:54:39

10

You wrote that, correct?

16:54:44

11

MR. PRESIADO: So the record reflects,

16:54:46

12

that wasn't read correctly by counsel.

16:54:47

13

MS. PINTADO: Okay. We can read it again.

16:54:49

R,H,
FSPK

14

Q So here you wrote, Ms. Baum: She is so

16:54:52

15

gross. More so because we know she has said that.

16:54:56

16

She's awful. I can't wait till we kill her in

16:54:59

17

court.

16:55:02

18

Did you write that, Ms. Baum?

16:55:03

19

A It says I wrote -- I -- it's there.

16:55:04

20

Q Did you write that?

16:55:09

21

A I guess.

16:55:10

22

Q Yes or no.

16:55:14

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CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum

Conducted on January 20, 2022

167

R, H, FSPK

1

A I must have.

16:55:17

2

Q Did you write that?

16:55:18

3

A I must have.

16:55:19

4

Q Why would you write that?

16:55:20

5

A Because she called -- used to call him an

16:55:23

6

old, fat man.

16:55:28

7

Q So she is gross?

16:55:29

8

MS. HOUCK: Objection; vague and

16:55:41

9

ambiguous.

16:55:43

10

THE WITNESS: I don't -- I don't know what

16:55:43

11

you want me -- what you're asking me to respond

16:55:44

12

to.

16:55:47

R, H,
FSPK

13

Q Do you think Amber's gross?

16:55:48

14

MR. PRESIADO: Objection; vague and

16:55:52

15

ambiguous.

16:55:53

16

MS. HOUCK: Join.

16:55:54

17

Q You wrote it here. Do you -- is this

16:55:55

18

statement true? Is this how you feel?

16:55:57

R, H,
FSPK

19

A Yes.

16:55:59

20

Q And do you think she's awful?

16:56:02

21

A Yes.

16:56:05

22

MR. PRESIADO: Objection; vague and

16:56:09

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CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum

Conducted on January 20, 2022

168

R, H,
FSPK

1	ambiguous as to time and context.	16:56:10
2	Q And why did you write: I can't wait --	16:56:12
3	A (Inaudible.)	16:56:12
4	Q Why did you write --	16:56:18
5	A I don't recall.	16:56:18
6	Q Why did you write: I can't wait till we	16:56:23
7	kill her in court?	16:56:27
8	A I don't -- I don't -- I don't know. I	16:56:28
9	can't recall.	16:56:30
10	Q All right.	16:56:31
11	MS. PINTADO: Let's go to --	16:56:42
12	Q Before we move on, why do you think she's	16:56:48
13	awful?	16:56:51
14	MR. PRESIADO: Objection; asked and	16:56:53
15	answered, argumentative, vague and ambiguous as to	16:56:57
16	time and context.	16:57:02
17	MS. HOUCK: Sorry, are you talking about	16:57:04
18	why did she think that at this time, or what is	16:57:06
19	the question?	16:57:09
20	MS. PINTADO: She says she still thinks	16:57:10
21	that Amber is awful.	16:57:11
22	Q Is that right, Ms. Baum?	16:57:14

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CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum
Conducted on January 20, 2022

169

1	A No. I'm answering in response to -- no,	16:57:15
2	I'm answering in response to this circumstance.	16:57:17
3	MR. PRESIADO: Objection; misstates	16:57:20
4	testimony --	16:57:22
5	MS. PINTADO: Okay.	16:57:22
6	MR. PRESIADO: -- assumes facts not in	16:57:22
7	evidence.	16:57:24
8	MS. PINTADO: Okay.	16:57:24
9	Q Do you think that Amber is awful?	16:57:26
10	MR. PRESIADO: Objection; vague and	16:57:30
11	ambiguous as to time.	16:57:32
12	Q Currently.	16:57:34
13	MR. PRESIADO: Objection; relevance.	16:57:35
14	THE WITNESS: I don't know why -- why my	16:57:38
15	opinion matters.	16:57:45
16	Q You wrote it here.	16:57:46
17	A I wrote it here respon- -- in -- in	16:57:50
18	relation to what we're discussing in the e-mail.	16:57:54
19	Q Okay.	16:57:58
20	MS. PINTADO: I'm going to pull up 48.	16:58:04
21	(Exhibit 25, The Washington Post article,	16:58:07
22	was marked for identification and is attached to	16:58:07

CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum

Conducted on January 20, 2022

170

1 the transcript.) 16:58:08

H,FSPK 2 AV TECHNICIAN: Exhibit 25. 16:58:09

3 BY MS. PINTADO: 16:58:26

H,FSPK 4 Q Do you recognize this document, Ms. Baum? 16:58:26

5 A Yes. 16:58:34

6 Q What is it? 16:58:35

7 A It's her op-ed piece she wrote. 16:58:39

8 Q And did Mr. Depp ever ask you to publish a 16:58:44

9 response to the op-ed? 16:58:47

10 A I can't recall. I don't believe so. 16:58:49

11 Q Do you recall you or any member of your 16:58:58

12 team preparing a counter op-ed for Mr. Depp? 16:59:01

13 A I don't recall. 16:59:10

14 Q Are you aware of any publishing of a 16:59:11

15 counter op-ed on behalf of Mr. Depp? 16:59:15

16 A Not that I recall. 16:59:17

17 Q Did you publish a statement about Amber's 16:59:23

18 op-ed? 16:59:29

19 A Not that I remember. 16:59:29

20 MS. PINTADO: Okay. Let's look at 49. 16:59:37

21 (Exhibit 26, Twitter screenshot, was 16:59:41

22 marked for identification and is attached to the 16:59:41

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CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum
Conducted on January 20, 2022

171

1 transcript.) 16:59:42

R,H, 2 AV TECHNICIAN: Exhibit 26. 16:59:42
FSPK

3 BY MS. PINTADO: 16:59:57

R,H, 4 Q Did you ever see this tweet, Ms. Baum? 16:59:57
FSPK

5 A I don't rem- -- I don't remember. I don't 17:00:02

6 go on Twitter unless I have to. 17:00:09

7 Q Is this Adam Waldman's handle -- Twitter 17:00:11

8 handle here? 17:00:17

9 MR. PRESIADO: Objection; calls for 17:00:18

10 speculation, lacks foundation. 17:00:20

11 MS. HOUCK: Join. 17:00:23

12 Q If you know. 17:00:25

13 A I -- I have no idea. 17:00:26

14 Q Okay. 17:00:27

R,H, 15 A I mean, it's -- there -- it's the same 17:00:29
FSPK

16 name. 17:00:31

17 Q Okay. Are you aware of any -- 17:00:31

18 MS. PINTADO: You can take this down. 17:00:37

19 Q Ms. Baum, are you aware of any woman ever 17:00:39

20 benefitting her career by publicizing her being a 17:00:43

21 victim of domestic violence? 17:00:47

22 MR. PRESIADO: Objection; vague and 17:00:51

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CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum

Conducted on January 20, 2022

172

1	ambiguous, relevance.	17:00:53
2	MS. HOUCK: Join.	17:00:55
3	THE WITNESS: I don't -- I don't know. I	17:01:08
4	don't have an answer for you.	17:01:09
5	BY MS. PINTADO:	17:01:11
6	Q You can't think of anyone, can you?	17:01:11
7	A What was the question again? How did you	17:01:14
8	phrase it?	17:01:22
9	Q Are you aware of any woman benefitting her	17:01:22
10	career by publicizing her being a victim of	17:01:25
11	domestic violence?	17:01:29
12	MR. PRESIADO: Objection; calls for	17:01:31
13	speculation, lack of foundation.	17:01:32
14	THE WITNESS: Other than Amber?	17:01:33
15	Q How has Amber's career benefitted by	17:01:35
16	saying she's a victim of domestic violence?	17:01:41
17	A I'm just asking -- I was just asking if	17:01:45
18	you were asking other than Amber.	17:01:47
19	Q I'm -- I'm asking you.	17:01:49
20	A I don't know.	17:01:52
21	Q Okay. Are you aware of anyone other than	17:01:53
22	Amber, in your words, benefitting their career by	17:01:59

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CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum
Conducted on January 20, 2022

173

1	publicizing that they are a victim of domestic	17:02:05
2	violence?	17:02:09
3	MR. PRESIADO: Objection; relevance.	17:02:09
4	THE WITNESS: I can't recall off the top	17:02:13
5	of my head.	17:02:16
6	Q Okay.	17:02:17
7	MS. PINTADO: I'll reserve my remaining	17:02:18
8	time.	17:02:20
9	MR. PRESIADO: Have you completed your	17:02:24
10	questioning?	17:02:25
11	MS. PINTADO: Yes, I -- for now, I have,	17:02:26
12	yes.	17:02:28
13	MR. PRESIADO: I have no questions.	17:02:29
14	MS. PINTADO: Okay. Well, then I'll keep	17:02:34
15	going in that case. I was under the impression	17:02:35
16	that this was a cross-notice deposition.	17:02:37
17	MR. PRESIADO: It was.	17:02:40
18	MS. PINTADO: Okay.	17:02:42
19	Let's take a ten-minute break.	17:02:54
20	MR. PRESIADO: Well, wait a second, no.	17:02:56
21	You said you're done with your questioning. You	17:02:57
22	can't take a break so you can go think of more	17:02:59

CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum

Conducted on January 20, 2022

174

1	questions. You were com- -- you were done.	17:03:01
2	MS. PINTADO: I have plenty of questions.	17:03:03
3	MR. PRESIADO: So start asking them.	17:03:04
4	MS. PINTADO: I was trying to reserve my	17:03:05
5	time for rebuttal. So I can keep asking.	17:03:07
6	MR. PRESIADO: Reserve --	17:03:11
7	MS. HOUCK: But the rebuttal would have	17:03:12
8	been limited to the scope of Mr. Presiado's	17:03:14
9	questioning. So I -- you know, if you have more	17:03:16
10	questions, Ms. Baum is here and ready to answer	17:03:20
11	them. But -- and -- you know, if we're done,	17:03:23
12	we're done.	17:03:25
13	MS. PINTADO: Great, great. I have more	17:03:26
14	questions.	17:03:27
15	MR. PRESIADO: Yeah. I mean, it seems to	17:03:39
16	me that if you're reserving time to rebut any	17:03:41
17	questions -- any testimony from my questioning,	17:03:44
18	that's not an issue of you having more questions	17:03:47
19	to ask. You're reserving time in -- for	17:03:50
20	rebuttal --	17:03:55
21	MS. PINTADO: I have --	17:03:55
22	MR. PRESIADO: -- questions and --	17:03:55

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CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum

Conducted on January 20, 2022

175

1	MS. PINTADO: No. Well, that was because	17:03:56
2	I was under the impression that you had cross-	17:03:56
3	noticed this in order to ask questions. So if	17:03:59
4	that's not the case, I'm going to continue. I was	17:04:02
5	only stopping because I -- my time was running	17:04:05
6	out, the 3.5, so I'm going to continue now.	17:04:07
7	BY MS. PINTADO:	17:04:14
8	Q Mr. -- Ms. Baum, did you or anyone on	17:04:14
9	Mr. Depp's behalf contact the LAPD during the	17:04:17
10	divorce proceedings?	17:04:20
11	A Did you ask did I or somebody else?	17:04:21
12	Q To your knowledge.	17:04:30
13	A I did not, and I have no knowledge.	17:04:31
14	Q Okay. Have you ever contacted the Eastern	17:04:35
15	Columbia Building?	17:04:46
16	A I have not.	17:04:46
17	Q Are you aware of any mediation efforts	17:04:49
18	between Mr. Depp and Amber during the summer of	17:05:13
19	2016?	17:05:17
20	A No, I'm not aware of that.	17:05:17
21	Q Do you know who Edward White is?	17:05:22
22	A Yes.	17:05:34

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CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum

Conducted on January 20, 2022

176

1	Q Who is Edward White?	17:05:35
2	A He is Johnny's business manager.	17:05:37
3	Q What, if any, interactions have you had	17:05:41
4	with Mr. White?	17:05:45
5	A Very little. My -- my accounting	17:05:47
6	department deals with his company to get paid.	17:05:57
7	Q Okay.	17:06:02
8	MR. PRESIADO: Ms. Pintado, it's okay if	17:07:22
9	you're finished.	17:07:23
10	MS. PINTADO: Thank you. I'm not	17:07:25
11	finished.	17:07:26
12	MR. PRESIADO: You're spending a lot of	17:07:27
13	time looking for another question.	17:07:30
14	MS. PINTADO: Well, I --	17:07:32
15	MR. PRESIADO: We won't think less of you	17:07:33
16	if you don't spend the full seven hours.	17:07:35
17	MS. PINTADO: I appreciate that. It means	17:07:37
18	a lot.	17:07:39
19	But I am going to take a five-minute	17:07:39
20	break, and let's reconvene in five minutes.	17:07:43
21	MR. PRESIADO: Well, I would object to	17:07:51
22	that. You claim you have additional questions.	17:07:52

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CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum

Conducted on January 20, 2022

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1	You should ask them instead of taking time to go	17:07:55
2	formulate new questions just for the purpose of	17:08:00
3	wasting all of our time and harassing this	17:08:04
4	witness.	17:08:07
5	MS. PINTADO: You filed your cross-notice	17:08:07
6	this morning, I believe.	17:08:12
7	MR. PRESIADO: I wasn't involved in that.	17:08:15
8	MS. PINTADO: So I have been rushing to	17:08:17
9	get through exhibits and questions and -- in order	17:08:19
10	for you to have your time. So now I need to go	17:08:23
11	back through my questions and see what I skipped	17:08:27
12	over so that you would have time. So I can have	17:08:31
13	five minutes now. I don't see any issue with	17:08:37
14	that.	17:08:39
15	MR. PRESIADO: Well, I object to this	17:08:40
16	deposition continuing because I see it as just	17:08:41
17	burdensome and harassing --	17:08:44
18	MS. PINTADO: Well --	17:08:44
19	MR. PRESIADO: -- to the witness, so...	17:08:46
20	MS. PINTADO: It --	17:08:49
21	MR. PRESIADO: And to everybody involved.	17:08:50
22	I mean, there's a lot of depositions in this case.	17:08:52

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CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum

Conducted on January 20, 2022

178

1	We're all busy on matters other than depositions	17:08:55
2	in this case, and it seems to me like you're just	17:08:58
3	trying to create -- to make this as long as	17:09:02
4	possible for whatever reason you may think is --	17:09:04
5	MS. PINTADO: I assure you I am not --	17:09:08
6	MR. PRESIADO: -- advantageous to you or	17:09:09
7	your firm or your client, probably your firm, but	17:09:11
8	nonetheless...	17:09:14
9	MS. PINTADO: I assure you I'm not trying	17:09:14
10	to make this as long as possible. And I have a	17:09:16
11	full seven hours with this witness, and that's	17:09:18
12	what I'm entitled to.	17:09:22
13	So I'm going to review, and I will come	17:09:23
14	back in five minutes. Thank you.	17:09:27
15	MR. PRESIADO: Pursuant to my objection.	17:09:32
16	THE VIDEOGRAPHER: Off the record at 5:09.	17:09:34
17	(Recess was held.)	17:15:07
18	THE VIDEOGRAPHER: Back on the record at	17:15:07
19	5:15.	17:15:54
20	MS. PINTADO: Let's pull 29, please.	17:15:56
21	(Exhibit 27, Chain of e-mails dated	17:16:20
22	4/20/15, Bates Nos. BAUM0000364 and BAUM0000365,	17:16:20

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CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum
Conducted on January 20, 2022

179

1 was marked for identification and is attached to 17:16:20
2 the transcript.) 17:16:21

F/A 3 AV TECHNICIAN: Exhibit 27. 17:16:21

4 BY MS. PINTADO: 17:16:23

5 Q And I'll give you a second to look through 17:16:26
6 this, Ms. Baum. 17:16:28

7 What's below the -- what's the Chelsea 17:16:46
8 Perrotty e-mail to me? 17:16:50

9 MS. PINTADO: Yeah, I'm -- I don't have 17:16:54
10 control over it right now. 17:16:55

11 AV TECHNICIAN: I apologize. 17:16:58

12 Ms. Baum, you have control. 17:16:58

13 Counsel? 17:17:00

14 MS. PINTADO: Yeah, you can give Ms. -- 17:17:01
15 I'll take control. 17:17:02

16 THE WITNESS: For some reason it won't 17:17:03
17 scroll for me. Okay. 17:17:05

18 Q Okay. 17:17:16

19 A I got it. Got it. Sorry. 17:17:17

20 Okay. 17:17:24

F/A 21 Q Okay. And this is an e-mail from 17:17:25

22 Ms. Chelsea Perrotty to you, on April 20, 2015; is 17:17:33

CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum

Conducted on January 20, 2022

180

H, FSPK

1

that correct?

17:17:39

2

A Yup, that's what it says.

17:17:39

3

Q Do you recognize this e-mail chain?

17:17:42

4

A I don't re- -- I don't remember it, but...

17:17:44

5

Q But this is, in fact, your e-mail,

17:17:51

6

correct, robin- --

17:17:54

7

A Yes.

17:17:55

8

Q -- @slate --

17:17:55

9

And Ms. Baum was -- sorry -- Ms. Perrotty

17:17:58

10

was inquiring about -- what was she inquiring

17:18:05

11

about? Sorry, I can't scroll down.

17:18:13

12

A She's asking about whether or not it's

17:18:19

13

true that the marriage is strained due to alcohol

17:18:22

14

and insecurity over her relationship with Eo --

17:18:28

15

Io.

17:18:36

F/A

16

Q And are you aware of any insecurity of

17:18:36

17

Mr. Depp about Io?

17:18:42

18

A Not aware at all, no.

17:18:44

19

Q And scrolling up, you write: I don't

17:18:47

20

think we should buy into this. It will pass.

17:19:00

H, FSPK

21

Was it your decision not to respond to

17:19:08

22

this press inquiry?

17:19:10

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CONTAINS CONFIDENTIAL INFORMATION - PTTP0

Transcript of Robin Baum
Conducted on January 20, 2022

181

1	A Yes. It was -- yes.	17:19:13
2	Q Why -- and why not respond?	17:19:16
3	A I mean, I can't recall what I was thinking	17:19:18
4	at the time. But it's from the Star magazine, so	17:19:26
5	I don't give credence to Star or National	17:19:34
6	Enquirer.	17:19:38
7	Q So is that one of the considerations you	17:19:39
8	have in terms of whether you'll respond to an	17:19:44
9	article?	17:19:49
10	MS. HOUCK: Objection; vague and	17:19:53
11	ambiguous.	17:19:54
12	MR. PRESIADO: Join.	17:19:54
13	Q Is one of the considerations --	17:19:56
14	A If you're asking me just in my practice --	17:19:58
15	Q Yes.	17:20:00
16	A -- not -- unrelated to this case --	17:20:01
17	Q Just generally, yes.	17:20:03
18	A -- yes, I take that into consideration,	17:20:06
19	the legitimacy of the outlet.	17:20:09
20	Q Would you consider The Washington Post a	17:20:11
21	legitimate outlet?	17:20:13
22	A Yes.	17:20:15

CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum

Conducted on January 20, 2022

182

FSPK	1	Q Why didn't you make any response to	17:20:15
	2	Amber's op-ed, then?	17:20:22
	3	A I don't want to speculate. I have no idea	17:20:25
	4	why. I have no recollection -- recollection of	17:20:27
	5	it.	17:20:31
	6	Q Okay.	17:20:38

	7	MS. PINTADO: Let's look at -- excuse	17:20:39
	8	me -- 33.	17:20:44
	9	(Exhibit 28, Chain of e-mails dated	17:20:46
	10	4/28/16 and 4/29/16, Bates Nos. BAUM0000618 and	17:20:46
	11	BAUM0000619, was marked for identification and is	17:20:46
	12	attached to the transcript.)	17:20:47

FSPK	13	AV TECHNICIAN: Exhibit 28.	17:20:47
------	----	----------------------------	----------

	14	Q And I'll scroll through here. Let me know	17:21:01
	15	when you're ready. It's actually sometimes better	17:21:13
	16	if we start at the beginning. There we go.	17:21:17
	17	A Okay.	17:21:24

FSPK	18	Q Do you know what this e-mail chain is?	17:21:24
	19	A Yes.	17:21:27
	20	Q What is it?	17:21:29
	21	A Johnny had asked me to help coordinate	17:21:29
	22	everything for her for the Met Ball attendance	17:21:35

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CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum
Conducted on January 20, 2022

183

H, FSPK	1	that they were going to. I think she was not	17:21:38
	2	paying her publicist at the time.	17:21:41
	3	Q And did you get a ticket for Mr. Depp?	17:21:43
	4	A I don't recall. I -- I wouldn't have	17:21:49
	5	booked the travel. I think I was just getting her	17:21:54
	6	availability.	17:21:57
	7	Q Okay. Do you have any recollection as to	17:21:58
	8	whether a ticket was booked for Mr. Depp?	17:22:02
	9	A I don't recall.	17:22:06
	10	Q Do you remember whether he attended the	17:22:09
	11	Met Ball on April 29, 2016? Sorry, not on --	17:22:14
	12	whether he attended the Met Ball?	17:22:19
	13	A Yeah. It wasn't that date.	17:22:21
	14	If I'm thinking correctly, he did not	17:22:30
	15	attend the Met Gala that year.	17:22:32
	16	Q Do you know why?	17:22:38
	17	A I don't -- I can't -- I don't want to --	17:22:42
	18	to -- to make something up, but -- I mean, because	17:22:53
	19	I don't remember exactly. I just remember being	17:22:57
	20	told he wasn't going.	17:23:00
	21	Q And Amber did go, correct?	17:23:02
	22	A Yes. I -- I -- well, I'm pretty sure she	17:23:06

CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum

Conducted on January 20, 2022

184

H,FSPK	1	still went.	17:23:10
	2	MS. PINTADO: All right. Let's pull 34.	17:23:15
	3	(Exhibit 29, Chain of e-mails dated	17:23:17
	4	5/29/16, Bates No. BAUM0000349, was marked for	17:23:17
	5	identification and is attached to the transcript.)	17:23:18
H,FSPK	6	AV TECHNICIAN: Exhibit 29.	17:23:18
	7	Q And this is one page.	17:23:40
	8	A Yup.	17:24:03
H,FSPK	9	Q What is this document?	17:24:03
	10	A This is from a writer from The Hollywood	17:24:04
	11	Reporter who e-mailed me about the box office.	17:24:13
	12	The movie Alice in Wonderland 2 opened	17:24:20
	13	around the same time of -- all of the initial	17:24:24
	14	press came out.	17:24:29
	15	Q Did you re- -- what is -- do you know	17:24:31
	16	Pamela McClintock?	17:24:39
	17	A Yeah, I -- yes. I don't know if she's	17:24:42
	18	still at The Reporter, but I know -- I know her	17:24:45
	19	name.	17:24:49
	20	Q And which publication was she with?	17:24:49
	21	A Well, at the time, she was with The	17:24:51
	22	Hollywood Reporter.	17:24:54

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CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum
Conducted on January 20, 2022

185

H, FSPK	1	Q	Okay. And is that a legitimate	17:24:54
	2		publication?	17:24:56
	3	A	I mean, some probably would argue it's	17:24:57
	4		not. But it's a trade -- it's an entertainment	17:25:02
	5		trade outlet.	17:25:06
	6	Q	Did you respond to this --	17:25:07
	7	A	I don't recall.	17:25:10
H, FSPK	8	Q	-- accusation?	17:25:11
	9	A	I don't recall.	17:25:13
	10	Q	Okay. And you forwarded this to	17:25:18
	11		Ms. Dembrowski, correct?	17:25:23
	12	A	Correct.	17:25:24
	13	Q	And why did you forward it to	17:25:25
	14		Ms. Dembrowski?	17:25:28
	15	A	I mean, I said it before: I shared	17:25:32
	16		everything with her.	17:25:34
	17	Q	And were these allegations true, that	17:25:34
	18		are -- here --	17:25:34
	19		MR. PRESIADO: Objection; lacks	17:25:45
	20		foundation, calls for speculation.	17:25:46
H, FSPK	21	Q	Here it says, Johnny Depp's marital	17:25:47
	22		troubles and the accusations by Amber Heard are	17:25:50

CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum

Conducted on January 20, 2022

186

F/A	1	impacting Alice 2 at the box office.	17:25:53
	2	A Yeah. I don't -- I'm not the right person	17:25:58
	3	to ask that.	17:26:00
	4	MS. HOUCK: What was the question?	17:26:01
	5	Q Yeah.	17:26:02
	6	MS. PINTADO: All right. Let's look at	17:26:14
	7	44.	17:26:16
	8	(Exhibit 30, Chain of e-mails dated	17:26:17
	9	12/7/20, Bates Nos. BAUM002208 and BAUM002209, was	17:26:17
	10	marked for identification and is attached to the	17:26:17
	11	transcript.)	17:26:19
F/A	12	AV TECHNICIAN: Exhibit 30.	17:26:19
	13	Q Do you recognize this document, Ms. Baum?	17:26:34
	14	A I mean, I don't recognize the document,	17:26:59
	15	but I remember the circumstances.	17:27:01
	16	Q Do you know what this document is?	17:27:08
	17	A It's an e-mail exchange between my	17:27:09
	18	business partner and myself.	17:27:11
	19	Q Okay. And so Simon Halls, is that your	17:27:13
	20	business partner?	17:27:19
	21	A Yes.	17:27:19
	22	Q Okay. And --	17:27:21

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Transcript of Robin Baum
Conducted on January 20, 2022

187

1 MS. HOUCK: Sorry, sorry, the cat is 17:27:25
2 pawing at Ms. Baum's head -- 17:27:27
3 THE WITNESS: Sorry. 17:27:29
4 MS. HOUCK: -- and I find it adorable. 17:27:30
5 Sorry for my laughter. 17:27:33
6 MS. PINTADO: It is very cute. 17:27:34
7 MS. HOUCK: Sorry. 17:27:35
8 BY MS. PINTADO: 17:27:36

H, FSPK 9 Q Looking at this e-mail from Tatiana 17:27:36
10 Siegel, she says, I am writing a cover story on 17:27:42
11 Johnny Depp for this week's magazine and I 17:27:47
12 include it -- I include part of the text exchange 17:27:49
13 between Depp and Bet- -- Bethany -- 17:27:52
14 Although I believe that's a typo and meant 17:27:55
15 to say Bettany. 17:27:58
16 A Yup. 17:27:58
17 Q -- about burning Amber Heard. 17:28:00
18 Do you know what text -- texts she was 17:28:02
19 referring to there? 17:28:07
20 A I do now. I don't -- I don't recall 17:28:08
21 whether I knew at the time of the -- this e-mail 17:28:11
22 exchange. 17:28:15

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Transcript of Robin Baum
Conducted on January 20, 2022

188

H, FSPK 1	Q Okay. And here you say to Mr. Sim- --	17:28:19
2	Simon Halls: Are you ignoring?	17:28:33
3	And he responds: Yes.	17:28:35
4	Is that correct?	17:28:38
5	A Correct.	17:28:39
6	Q And you say that you didn't engage.	17:28:40
7	The lawyers asked me not to.	17:28:46
8	Is that correct?	17:28:48
9	Sorry --	17:28:51
10	A It must be --	17:28:51
H, FSPK 11	Q -- is that correct, that the lawyers asked	17:28:52
12	you not to engage?	17:28:53
13	A It has to be correct if I wrote that.	17:28:54
14	Q Okay. Do you have any idea why you were	17:28:56
15	to not engage?	17:29:02
16	MR. PRESIADO: Objection to the extent --	17:29:05
17	MS. HOUCK: Objection.	17:29:07
18	MR. PRESIADO: Objection to the extent	17:29:08
19	that calls for attorney-client communications.	17:29:09
20	Again, Ms. Baum, if disclosing attorney-	17:29:11
21	client communications is required to answer that	17:29:14
22	question, I would ask that you not.	17:29:16

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CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum

Conducted on January 20, 2022

189

1 THE WITNESS: Understood. 17:29:20

2 MS. HOUCK: Join. So if the only way to 17:29:23

3 answer that question is to break the privilege, 17:29:30

4 then you can say that you can't -- you can't 17:29:32

5 answer that question. 17:29:34

6 THE WITNESS: I'll pass on answering the 17:29:38

7 question. 17:29:39

8 Q And just to clarify, are you passing 17:29:40

9 because you're asserting the privilege? 17:29:45

10 A I'm passing because my -- the lawyers 17:29:52

11 advised me to pass since it was a conversation 17:29:54

12 between me and the lawyer. 17:29:57

13 Q Okay. 17:29:59

14 MS. PINTADO: And I'm once again 17:30:02

15 disagreeing with that and objecting to that 17:30:04

16 assertion of privilege. 17:30:07

FSPK 17 Q Did the disclosure of the Bettany texts in 17:30:14

18 the U.K. generate a lot of publicity? 17:30:17

19 MS. HOUCK: Objection; vague and 17:30:23

20 ambiguous. 17:30:25

FSPK 21 THE WITNESS: It got -- it got publicity. 17:30:25

22 Q Did it get publicity in the U.S.? 17:30:31

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Transcript of Robin Baum
Conducted on January 20, 2022

190

H, FSPK, 1 VA	A Yes.	17:30:33
2	Q And the U.K. as well?	17:30:34
3	A I -- I can't -- I don't know. I mean, I	17:30:38
4	would be assuming.	17:30:43
5	Q And would you say it was negative	17:30:44
6	publicity for Mr. Depp?	17:30:48
7	A Yes.	17:30:50
8	Q Why is that?	17:30:53
9	A Based on the contents of the text	17:30:55
10	exchange.	17:31:04
11	Q Do you remember any of the specific	17:31:05
12	context -- contents?	17:31:07
13	A I mean, that -- the part that's in this	17:31:09
14	e-mail.	17:31:20
15	Q That he wanted to burn Amber Heard?	17:31:21
16	A Yeah.	17:31:30
17	MS. HOUCK: Objection; misstates the	17:31:31
18	document.	17:31:32
19	MR. PRESIADO: Join.	17:31:33
20	Q And were those texts damaging to	17:31:37
21	Mr. Depp's reputation?	17:31:42
22	MR. PRESIADO: Objection; lacks	17:31:44

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Transcript of Robin Baum
Conducted on January 20, 2022

191

1	foundation, calls for speculation. Object to the	17:31:45
2	extent it calls for expert opinion testimony.	17:31:47
3	MS. HOUCK: Join.	17:31:50
4	THE WITNESS: I don't -- yeah, I don't	17:31:51
5	know that I'm qualified to answer that.	17:31:55
6	MS. PINTADO: Let's go to 45.	17:32:01
7	(Exhibit 31, Chain of e-mails dated	17:32:04
8	1/7/21, Bates Nos. BAUM002214 through BAUM002216,	17:32:04
9	was marked for identification and is attached to	17:32:04
10	the transcript.)	17:32:05
F/A 11	AV TECHNICIAN: Exhibit 31.	17:32:05
12	MS. PINTADO: If, at any time, someone	17:32:23
13	needs to take a break, please let me know.	17:32:25
14	Q Do you recognize this document, Ms. Baum?	17:32:35
15	A No, I don't remember it.	17:32:37
16	MS. HOUCK: Are these multiple e-mail	17:32:51
17	chains in this document? Okay.	17:32:53
18	MS. PINTADO: I'm sorry. I have to	17:33:00
19	refresh my recollection as well. It does appear	17:33:03
20	to be.	17:33:06
F/A 21	Q Let's look at what's marked BAUM 2216.	17:33:12
22	And do you recognize this e-mail?	17:33:20

CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum
Conducted on January 20, 2022

192

1 A I mean, I don't -- I didn't remember it 17:33:26
2 prior to seeing it now. 17:33:28

H, FSPK 3 Q What is it? 17:33:31

4 A It's an e-mail from E! News asking for 17:33:32
5 comment. 17:33:39

6 Q Would you describe E! News as a legitimate 17:33:42
7 publication? 17:33:46

8 A They borderline on gossip and tabloid. 17:33:46

9 Q And here Leanne Gutierrez from E! News 17:33:55
10 says, I wanted to reach out as we saw the Daily 17:34:03
11 Mail is reporting that Johnny Depp has accused 17:34:08
12 Amber Heard of pocketing the 7 million settlement 17:34:11
13 from their divorce and repeatedly lying about 17:34:15
14 giving it all to charity. 17:34:16

15 Did you think it was worth responding to 17:34:19
16 that? 17:34:21

17 A I don't recall, but -- I don't know. I 17:34:22
18 don't recall. 17:34:26

19 Q Is that true, to your knowledge? 17:34:26

20 MS. HOUCK: Objection; vague and 17:34:35
21 ambiguous, calls for speculation. 17:34:38

22 THE WITNESS: I would just be answering 17:34:49

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CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum
Conducted on January 20, 2022

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1 based on whatever I've heard. 17:34:50

2 Q What have you heard? 17:34:54

3 MR. PRESIADO: Objection; calls for 17:34:56
4 hearsay. 17:34:57

5 THE WITNESS: I actually heard from 17:34:58
6 attorneys, so I won't answer. 17:35:02

7 MS. PINTADO: Okay. Let's go to -- let's 17:35:07
8 go to 47. 17:35:17

9 (Exhibit 32, Chain of e-mails dated 17:35:20
10 5/24/17, Bates Nos. BAUM001732 and BAUM001733, was 17:35:20
11 marked for identification and is attached to the 17:35:20
12 transcript.) 17:35:21

F/A, FSPK₁₃ AV TECHNICIAN: Exhibit 32. 17:35:21

14 BY MS. PINTADO: 17:35:42

15 Q I'll scroll down to here. This is a two- 17:35:42
16 page -- oh, it's just that, so... 17:35:54

F/A, FSPK₁₇ Do you recognize this document? 17:35:57

18 A I vague- -- yeah, I vaguely remember this. 17:35:58

19 Q Do you remember what happened with the 17:36:17
20 London Fields lawsuits? 17:36:20

21 A I do not. 17:36:22

22 Q Do you know whether Mr. Depp pulled 17:36:24

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Transcript of Robin Baum
Conducted on January 20, 2022

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1 support for Amber's film regarding London Fields? 17:36:31
2 A I'm not quite exactly sure what you're -- 17:36:39
3 what you're asking me. You're saying this is 17:36:45
4 Amber's movie. I could be wrong, but I think he 17:36:52
5 has -- he did a role in it too. 17:37:02

H,FSPK⁶ Q Okay. Do you know why -- was there -- did 17:37:04
7 you ever do any publicity for the film? 17:37:07

8 A We did not. 17:37:10

9 Q Do you know why not? 17:37:14

10 A I -- I don't recall. I think you'd have 17:37:15
11 to show me if you have any documents. I don't 17:37:23
12 recall. 17:37:27

13 Q Do you recall that Mr. Depp was unhappy 17:37:27
14 with Amber's nudity scenes in the film? 17:37:30

15 A I believe I heard that. I didn't hear it 17:37:32
16 from him. 17:37:43

17 Q Okay. Do you remember who you heard it 17:37:46
18 from? 17:37:49

19 MR. PRESIADO: Objection; hearsay. 17:37:50

H,FSPK²⁰ THE WITNESS: I do not. 17:37:51

21 THE REPORTER: Was there an answer -- 17:38:00

22 Q Do you remember? 17:37:58

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Transcript of Robin Baum
Conducted on January 20, 2022

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1 THE REPORTER: -- there? Sorry. 17:38:02

2 THE WITNESS: I do not. Sorry. 17:38:02

3 MS. PINTADO: Let's look at 42, please. 17:38:26

4 (Exhibit 33, Chain of e-mails dated 17:38:36

5 8/25/16, Bates No. BAUM 0000472, was marked for 17:38:36

6 identification and is attached to the transcript.) 17:38:37

H,FSPK 7 AV TECHNICIAN: Exhibit 33. 17:38:37

8 BY MS. PINTADO: 17:38:48

9 Q Do you recognize this document, Ms. Baum? 17:38:48

H,FSPK 10 A I don't remember the document, but... I 17:39:08

11 don't remember the document. 17:39:14

12 Q What is the document? 17:39:16

13 A Honestly, I'm not really quite sure. He's 17:39:17

14 asking -- she's asking me if I have a statement to 17:39:27

15 send to her. 17:39:30

16 Q She says, Would you be able to send -- 17:39:33

17 A And then she's writing to me that Johnny 17:39:37

18 sent installments of the money to the charities. 17:39:42

19 Q This is an e-mail from you, is it not? It 17:39:47

20 says to Dina Sansing at NBCUniversal. 17:39:51

21 A Yeah. 17:39:58

22 Q So this was sent from your iPhone, 17:39:59

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Transcript of Robin Baum

Conducted on January 20, 2022

196

H, FSPK

1

correct?

17:40:01

2

A Yeah, must be, yeah. It just was weird

17:40:04

3

that it doesn't say From.

17:40:08

4

Q And so Dina Sansing at NBCUniversal says,

17:40:13

5

Would you be able to send me the statement

17:40:21

6

regarding Johnny donating money to the ACLU and

17:40:22

7

Children's hospital?

17:40:26

8

Correct? And you --

17:40:27

9

A Yes.

17:40:27

H, FSPK 10

11

Q -- responded -- sorry. And you responded

17:40:28

12

with the statement which says, Johnny Depp has

17:40:33

13

sent the first of multiple installments of monies

17:40:37

14

to each charity in the name of Amber Heard --

17:40:40

15

Correct?

17:40:43

A Uh-huh, correct.

17:40:43

H, FSPK 16

17

Q -- which when completed will honor the

17:40:46

18

full amount of Ms. Heard's pledge.

17:40:49

19

Is that right? Do you remember where you

17:40:50

received this statement?

17:40:52

20

A I don't remember.

17:40:53

21

Q Is everything in this statement true, to

17:40:58

22

your knowledge?

17:41:03

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Transcript of Robin Baum
Conducted on January 20, 2022

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H, FSPK	1	A	If I sent this statement, then everything	17:41:04
	2		seemed true.	17:41:10
	3	Q	Okay. Thank you. And just to clarify,	17:41:13
	4		this was August 25, 2016 that you sent that	17:41:16
	5		statement, correct?	17:41:19
	6	A	Yup.	17:41:20
	7	Q	And just to reassure you, I don't have	17:41:47
	8		much more.	17:41:50
	9		Okay. Were you working with Mr. Depp when	17:42:22
	10		he first won the role of Jack Sparrow in the	17:42:25
	11		Pirates of the Caribbean franchise?	17:42:29
	12	A	I was not.	17:42:32
	13	Q	When did you -- do you remember which	17:42:34
	14		Pirates movie he was working on when you started	17:42:36
	15		working for him?	17:42:38
	16	A	Well, I started working with him when he	17:42:39
	17		had Finding Neverland coming out, and I did	17:42:43
	18		Pirates 2 with him.	17:42:46
	19	Q	Okay. Were there ever any issues that you	17:42:49
	20		were made aware of on the Pirates 2 filming of	17:42:52
	21		getting Mr. Depp to set on time?	17:42:56
	22	A	Not that I'm aware of.	17:42:59

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Transcript of Robin Baum

Conducted on January 20, 2022

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1	Q Were there ever any issues on the set of	17:43:02
2	Pirates 2 due to Mr. Depp's drinking?	17:43:06
3	A Not that I'm aware of.	17:43:09
4	Q Were there ever any issues on the set of	17:43:14
5	Pirates 2 due to Depp's drug use?	17:43:17
6	A Not that I'm aware of.	17:43:19
7	MR. PRESIADO: Belated objection; assumes	17:43:24
8	facts not in evidence.	17:43:26
9	Q And turning to Pirates 3, were you working	17:43:28
10	with Mr. Depp when he was filming Pirates 3?	17:43:32
11	A Yes.	17:43:37
12	Q And were there ever any issues on the set	17:43:42
13	of Pirates 3 with getting Mr. Depp to set on time?	17:43:46
14	A Not that I'm aware of.	17:43:50
15	Q Were there ever any issues on Pirates 3	17:43:53
16	due to Depp's drinking?	17:43:57
17	A Not that I'm aware of.	17:43:59
18	Q And what about Depp's drug use?	17:44:00
19	A Not that I'm aware of.	17:44:06
20	MR. PRESIADO: Objection; assumes facts	17:44:08
21	not in evidence.	17:44:08
22	MS. PINTADO: Hello.	17:44:16

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Transcript of Robin Baum

Conducted on January 20, 2022

199

1	THE WITNESS: He's ready to wrap this up.	17:44:17
2	Q Were there ever any issues on the set of	17:44:20
3	Pirates 4 with getting Mr. Depp to set on time?	17:44:23
4	A I'm not aware.	17:44:26
5	Q Were there ever any issues on the set of	17:44:31
6	Pirates 4 due to Depp's drinking?	17:44:35
7	A I'm -- I'm not aware.	17:44:38
8	Q And what about drug use?	17:44:41
9	A I'm not aware.	17:44:43
10	MR. PRESIADO: Belated objection; assumes	17:44:45
11	facts not in evidence.	17:44:49
12	Q Were there ever any issues on the set of	17:44:49
13	Pirates 5 with getting Mr. Depp to set on time?	17:44:53
14	A I'm not aware.	17:44:57
15	Q Were there ever any issues on the set of	17:45:04
16	Pirates 5 due to Depp's drinking?	17:45:07
17	A I am -- I'm not aware.	17:45:10
18	Q And what about Mr. Depp's drug use?	17:45:14
19	MR. PRESIADO: Objection; assumes facts	17:45:18
20	not in evidence.	17:45:21
21	THE WITNESS: I'm not aware.	17:45:21
22	Q Did you have conversations with Mr. Depp	17:45:23

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Transcript of Robin Baum
Conducted on January 20, 2022

200

1	about doing a sixth Pirates of the Caribbean	17:45:27
2	movie?	17:45:31
3	A I did not.	17:45:31
4	Q Do you know what the status of the sixth	17:45:32
5	Pirates of the Caribbean movie is?	17:45:36
6	A I -- I don't know.	17:45:38
R, H, FSPK	7 Q Does -- Mr. Depp has testified that he	17:45:41
	8 would not do a sixth movie, and I quote, for	17:45:47
	9 \$300 million and a million alpacas.	17:45:51
	10 Have you received any indication from	17:45:56
	11 Mr. Depp that that is the case?	17:45:58
	12 A I have not.	17:46:00
	13 Q Okay. And --	17:46:03
	14 MS. PINTADO: Excuse me. Let me take just	17:46:23
	15 three minutes, if you don't mind.	17:46:30
	16 MS. HOUCK: That's fine.	17:46:33
	17 THE VIDEOGRAPHER: Off the record at 5:46.	17:46:35
	18 (Recess was held.)	17:50:37
	19 THE VIDEOGRAPHER: Back on the record at	17:50:37
	20 5:50.	17:50:43
	21 BY MS. PINTADO:	17:50:44
	22 Q Ms. Baum, are you aware of any actor	17:50:46

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Transcript of Robin Baum
Conducted on January 20, 2022

201

1 improving their reputation by publicizing a 17:50:49

2 domestic violence claim? 17:50:53

3 MR. PRESIADO: Objection; relevance. 17:51:05

4 MS. HOUCK: Can you just -- improving 17:51:13

5 their what? What was that word you used? 17:51:14

6 BY MS. PINTADO: 17:51:16

7 Q Let me rephrase it. 17:51:16

R 8 Are you aware, Ms. Baum, of any actor 17:51:17

9 improving their reputation by publicizing that 17:51:21

10 they are a victim of domestic violence? 17:51:24

11 A And you -- when you say "any actor," are 17:51:31

12 you -- actress, actor, under that umbrella? 17:51:38

13 Q Yes. 17:51:42

14 MR. PRESIADO: Objection to the extent it 17:51:43

15 calls for -- 17:51:44

16 THE WITNESS: So it's the same question 17:51:45

17 you asked me once before. 17:51:46

18 Q It's slightly different, so if you would 17:51:47

19 answer, please. 17:51:49

R 20 A I -- I -- I can't think of anyone. 17:52:13

21 MS. PINTADO: Thank you, Ms. Baum. I do 17:52:16

22 not have any further questions. 17:52:18

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Transcript of Robin Baum

Conducted on January 20, 2022

202

1	MR. PRESIADO: I don't have any questions.	17:52:19
2	THE VIDEOGRAPHER: Is that it?	17:52:25
3	MR. PRESIADO: Yup.	17:52:27
4	THE VIDEOGRAPHER: Okay. We are off the	17:52:29
5	record at 5:52.	17:52:30
6	(Off the record at 5:52 p.m.)	
7		
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CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum
Conducted on January 20, 2022

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ACKNOWLEDGMENT OF DEPONENT

I, ROBIN BAUM, do hereby acknowledge that
I have read and examined the foregoing testimony,
and the same is a true, correct and complete
transcription of the testimony given by me and any
corrections appear on the attached Errata sheet
signed by me.

(DATE)

(SIGNATURE)

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Transcript of Robin Baum
Conducted on January 20, 2022

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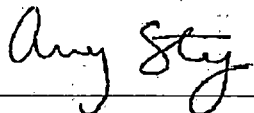
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NOTARY PUBLIC

I, AMY STRYKER, Certified Court Reporter
and Notary Public, the officer before whom the
foregoing deposition was taken, do hereby certify
that the foregoing transcript is a true and
correct record of the proceedings; that said
testimony was taken by me stenographically and
thereafter reduced to typewriting under my
supervision; that reading and signing was
requested; and that I am neither counsel for nor
related to, nor employed by any of the parties to
this case and have no interest, financial or
otherwise, in its outcome.

IN WITNESS WHEREOF, I have hereunto set my
hand and affixed my notarial seal this 31st day of
January, 2022.

My commission expires November 18, 2023.



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