



Planet Depos
We Make It Happen™

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

CONFIDENTIAL

Transcript of Whitney Henriquez

Date: February 3, 2022

Case: Depp, II -v- Heard

Planet Depos

Phone: 888.433.3767

Email: transcripts@planetdepos.com

www.planetdepos.com

WORLDWIDE COURT REPORTING & LITIGATION TECHNOLOGY

37006

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

-----X

JOHN C. DEPP, II, :

Plaintiff and :

Counterclaim Defendant, : Civil Action No.:

v. : CL-2019-0002911

AMBER LAURA HEARD, :

Defendant and :

Counterclaim Plaintiff. :

-----X

CONFIDENTIAL

VIDEOTAPED DEPOSITION

WHITNEY HENRIQUEZ

CONDUCTED VIRTUALLY

THURSDAY, FEBRUARY 3, 2022

12:32 p.m. EST

Job No.: 427235

Pages 1 - 278

Reported by: APRIL REID

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

2

1 Videotaped Deposition of WHITNEY HENRIQUEZ
2 held virtually. All appeared remotely.

3
4 A P P E A R A N C E S

5
6 ON BEHALF OF THE PLAINTIFF AND
7 COUNTERCLAIM DEFENDANT JOHN C. DEPP, II:

8 BENJAMIN G. CHEW, ESQ.

9 BROWN RUDNICK, LLP

10 601 Thirteenth Street, N.W.

11 Suite 600

12 Washington, D.C. 20005

13 (202) 536-1700

14 and

15 CAMILLE VASQUEZ, ESQ.

16 SAMUEL MONIZ, ESQ.

17 BROWN RUDNICK, LLP

18 2211 Michelson Drive

19 Seventh Floor

20 Irvine, CA 92612

21 (949) 752-7100

22

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

3

1 A P P E A R A N C E S cont'd

2

3 ON BEHALF OF THE PLAINTIFF AND
4 COUNTERCLAIM DEFENDANT JOHN C. DEPP, II:

5 YARELYN MENA, ESQ.

6 BROWN RUDNICK, LLP

7 7 Times Square

8 New York, NY 10036

9 (212) 209-4800

10

11 ON BEHALF OF DEFENDANT AND COUNTERCLAIM
12 PLAINTIFF AMBER LAURA HEARD:

13 ELAINE CHARLES BREDEHOFT, ESQ.

14 DAVID E. MURPHY, ESQ.

15 MICHELLE BREDEHOFT, Paralegal

16 CHARLSON BREDEHOFT COHEN & BROWN, P.C.

17 11260 Roger Bacon Drive

18 Suite 201

19 Reston, VA 20190

20 (703) 318-6800

21

22

1 A P P E A R A N C E S cont'd

2

3 ALSO PRESENT:

4

5 JOHN C. DEPP, II, Plaintiff and
6 Counterclaim Defendant

7

8 AMBER LAURA HEARD, Defendant and
9 Counterclaim Plaintiff

10

11 LUCIEN NEWLL, Remote Technician

12

13 KIM JOHNSON, Videographer

14

15 - - - - -

16

17

18

19

20

21

22

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

5

I N D E X

WHITNEY HENRIQUEZ	PAGE
Examination by Mr. Chew	9

E X H I B I T S

Whitney Henriquez	DESCRIPTION	PAGE
Exhibit 16	Whitney Henriquez's testimony from July 23, 2020	25
Exhibit 1	text messages Bates No. WH 63	102
Exhibit 2	text messages Bates No. WH 64-66	107
Exhibit 3	UK Witness Statement of Whitney Henriquez	126
Exhibit 4	text messages Bates No. WH 27-31	132
Exhibit 5	Photograph, Bates No. Depp 11928.	148
Exhibit 6	Text messages, Bates No. Depp 12672-12674.	155
Exhibit 7	Text Messages, Bates No. Depp 12670.	164

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

6

1	E X H I B I T S		
2	Whitney Henriquez	DESCRIPTION	PAGE
3	Exhibit 8	Text Messages, Bates No.	200
4		WH106-109.	
5	Exhibit 14	Text Messages, Bates No.	222
6		WH49.	
7	Exhibit 15	Text Messages, Bates No.	228
8		WH58-60.	
9	Exhibit 9	Text Messages, Bates No.	240
10		WH37.	
11	Exhibit 10	Text Messages, Bates No.	248
12		WH38.	

- - - - -

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

7

1 P R O C E E D I N G S

2 THE VIDEOGRAPHER: Here begins the video 12:32:57
3 recorded deposition of Whitney Henriquez 12:32:59
4 taken in the matter of Depp vs. Heard in the 12:33:01
5 Circuit Court of Fairfax County, Virginia, 12:33:03
6 Case No. CL2019-0002911. 12:33:07

7 Today's date is February 3rd, 2022. The 12:33:13
8 time is -- what time is it? Hold on -- 12:33 12:33:16
9 Eastern time. 12:33:24

10 This deposition is being held in 12:33:25
11 different locations via Zoom. 12:33:26

12 The court reporter is April Reid. The 12:33:28
13 video camera operator is Kim Johnson. Both 12:33:30
14 are on behalf Planet Depos. 12:33:34

15 Will counsel please introduce yourself 12:33:35
16 and state whom you represent. 12:33:37

17 MR. CHEW: Good morning. My name is Ben 12:33:38
18 Chew and with me are Camille Vasquez and 12:33:41
19 Yarelyn Mena, and all of us represent 12:33:45
20 plaintiff, Johnny Depp. 12:33:48

21 MS. BREDEHOFT: Good afternoon. My name 12:33:49
22 is Elaine Bredehoft, and with me is David 12:33:50

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

8

1	Murphy, an attorney in my office, Michelle	12:33:54
2	Bredehoft, a paralegal, and Amber Heard. I	12:33:56
3	represent both Amber Heard and Whitney	12:34:00
4	Henriquez today.	12:34:04
5	THE VIDEOGRAPHER: Will the court	12:34:05
6	reporter please swear in the witness.	12:34:06
7	THE COURT REPORTER: Yes.	12:34:23
8	Ms. Henriquez, if you will please raise your	12:34:23
9	right hand.	12:34:25
10	THEREUPON:	12:34:26
11	WHITNEY HENRIQUEZ	12:34:26
12	being first duly sworn or affirmed to	12:34:26
13	testify to the truth, the whole truth, and	12:34:26
14	nothing but the truth, was examined and	12:34:26
15	testified as follows:	12:34:26
16	THE COURT REPORTER: Thank you.	12:34:27
17	EXAMINATION	12:34:27
18	BY MR. CHEW:	12:34:28
19	Q. Good morning, Ms. Henriquez. My name is	12:34:30
20	Ben Chew and I represent your former	12:34:33
21	brother-in-law, Johnny Depp.	12:34:36
22	Can you please tell us in what city and	12:34:38

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

9

1	state you currently reside. We don't need the	12:34:40
2	exact address, just the city and state, please.	12:34:43
3	A. Los Angeles, California.	12:34:45
4	MS. BREDEHOFT: Ben, could I just --	12:34:48
5	Q. And what kind of --	12:34:50
6	MS. BREDEHOFT: -- before you go much	12:34:51
7	further, Ms. Henriquez, is nine-and-a-half	12:34:53
8	months pregnant and imminent in that	12:34:57
9	situation, so she may need to take breaks a	12:35:02
10	little more abruptly and everything. I just	12:35:05
11	wanted to put that on the record and let you	12:35:06
12	be aware of that.	12:35:06
13	Go ahead.	12:35:07
14	MR. CHEW: Thank you, Elaine.	12:35:07
15	BY MR. CHEW:	12:35:08
16	Q. And we -- I was going to mention that.	12:35:09
17	You know, even -- irrespective of your condition,	12:35:10
18	it is always your right as a witness to take a	12:35:14
19	break whenever you want to do that. It's not our	12:35:16
20	business why you're doing that. All we ask is	12:35:20
21	that you please try not to take a break in the	12:35:24
22	middle of the question; in other words, if I ask	12:35:27

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

10

1	you a question, if you can answer it, and then say	12:35:30
2	I -- I would like to take a break, please -- or	12:35:33
3	not even please, and then you'll take the break.	12:35:36
4	A. Understood.	12:35:38
5	Q. But I'd appreciate that.	12:35:39
6	A. Thank you.	12:35:42
7	Q. You're welcome.	12:35:43
8	In what type of home do you live,	12:35:44
9	Ms. Henriquez? Is it a house or an apartment?	12:35:46
10	A. A house.	12:35:49
11	Q. Do you own the house?	12:35:51
12	A. No, sir.	12:35:55
13	Q. Do you rent it?	12:35:56
14	A. Yes, sir.	12:35:57
15	Q. Are -- are you living in the house with	12:36:02
16	anybody else?	12:36:04
17	A. Yes. My husband and my three-year-old.	12:36:05
18	Q. What is your husband's name?	12:36:11
19	A. His name is Gavin.	12:36:13
20	MS. BREDEHOFT: I'm going to just -- I'm	12:36:17
21	going to ask that the deposition be marked	12:36:20
22	"confidential." We can go back and	12:36:22

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

11

1	de-designate later, but I just, for	12:36:24
2	comfort -- for purposes of privacy for now,	12:36:27
3	so we'll just label it confidential. Thank	12:36:29
4	you.	12:36:32
5	MR. CHEW: Understood. And I appreciate	12:36:32
6	that, Elaine.	12:36:34
7	BY MR. CHEW:	12:36:35
8	Q. Ms. Henriquez, have you ever been	12:36:35
9	deposed before?	12:36:37
10	A. No, sir.	12:36:38
11	Q. And -- but you do understand that you're	12:36:42
12	testifying under oath today; correct?	12:36:44
13	A. Yes, sir.	12:36:47
14	Q. Are you currently taking any medications	12:36:48
15	that might affect your ability to testify	12:36:51
16	accurately today?	12:36:53
17	A. No, sir.	12:36:54
18	Q. Do you have any medical condition that	12:36:57
19	might affect your testimony today?	12:37:00
20	A. No, sir, other than my obvious	12:37:03
21	pregnancy.	12:37:08
22	Q. Understood. Understood.	12:37:09

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

12

1	Because it's important that our very	12:37:10
2	talented court reporter take down everything as	12:37:16
3	said, if you could please try to answer with words	12:37:20
4	rather than shaking your head or saying uh-huh or	12:37:24
5	uh-uh.	12:37:29
6	It's also very important that you and I	12:37:31
7	not speak over each other because the court	12:37:33
8	reporter can only transcribe one voice at a time.	12:37:35
9	Also, your attorney, Ms. Bredehoft,	12:37:43
10	doubtless will be making objections to some of my	12:37:46
11	questions. I will try not to talk over her and	12:37:50
12	she will try to let me finish my question. And	12:37:55
13	then I'll let her finish her objection.	12:37:58
14	Despite her objecting, you have to	12:38:01
15	answer the question unless she specifically	12:38:04
16	instructs you not to answer. So you'll hear a lot	12:38:09
17	of objections, but you're supposed to answer the	12:38:11
18	question anyway, unless Ms. Bredehoft is --	12:38:14
19	explicitly tells you not to answer.	12:38:17
20	If I answer a question -- if I ask you a	12:38:23
21	question that doesn't make sense, please let me	12:38:26
22	know; otherwise, I'll assume that you understand	12:38:27

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

13

1	the question.	12:38:30
2	(Johnny Depp, II, entered the virtual	12:38:31
3	deposition room.)	12:38:31
4	Q. And finally, going back to your	12:38:31
5	counsel's first point, take a break whenever you	12:38:33
6	want and we'll wait for you. Just try to do it	12:38:36
7	after you've answered a question.	12:38:41
8	MS. BREDEHOFT: Mr. Chew, can I just	12:38:44
9	jump in? Someone else has joined us here. I	12:38:45
10	think we need to put it on the record. I	12:38:48
11	think it's your client, perhaps.	12:38:54
12	MR. CHEW: Oh, is that Mr. Depp on the	12:38:56
13	line?	12:38:57
14	MS. VASQUEZ: Yes, I believe Mr. Depp	12:39:02
15	has joined.	12:39:04
16	MR. CHEW: Okay.	12:39:05
17	BY MR. CHEW:	12:39:05
18	Q. Ms. Henriquez, other than your	12:39:05
19	attorneys, did you speak to anyone else about your	12:39:07
20	deposition here today?	12:39:12
21	A. No.	12:39:13
22	Q. Did you speak with your husband about	12:39:18

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022 •

14

1	it?	12:39:22
2	A. He only knows I'm doing it.	12:39:22
3	Q. You didn't talk with him about any of	12:39:28
4	the substance, what you might be asked, what you	12:39:30
5	would answer; is that correct?	12:39:33
6	A. I did not speak to him regarding	12:39:36
7	specifics.	12:39:38
8	Q. Did you speak with your sister, Amber	12:39:39
9	Heard, about the fact of your deposition here	12:39:42
10	today?	12:39:46
11	A. She knows I'm being deposed, but she	12:39:46
12	also doesn't know specifics.	12:39:51
13	Q. Now, if I refer to the "UK action," do	12:39:56
14	you know what I am referring to?	12:39:59
15	A. Yes.	12:40:03
16	Q. And if you could just tell us so the	12:40:04
17	record is clear.	12:40:06
18	A. Sure.	12:40:08
19	You're referring to the case that took	12:40:09
20	place in the summer of 2020 against the Sun	12:40:11
21	publication and Dan Wootton.	12:40:17
22	Q. Yes.	12:40:20

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

15

1	And just to be clear -- and the	12:40:21
2	plaintiff in that action was Mr. Depp; correct?	12:40:22
3	A. Correct.	12:40:26
4	Q. So if I speak about the "UK action" or	12:40:26
5	the "UK trial," you will understand that's what	12:40:28
6	I'm talking about so we don't have to repeat it	12:40:30
7	each time?	12:40:33
8	A. Yes, sir.	12:40:34
9	Q. Okay. After the UK trial, did you	12:40:35
10	discuss the outcome with your sister Amber?	12:40:39
11	MS. BREDEHOFT: Objection to the form of	12:40:46
12	the question.	12:40:47
13	But go ahead.	12:40:48
14	A. Nothing -- nothing outside of what was	12:40:50
15	already published or what we experienced whilst we	12:40:54
16	were in the UK.	12:40:57
17	Q. Can you tell us more specifically what,	12:41:00
18	if anything, you said to your sister Amber about	12:41:03
19	the outcome of the UK trial?	12:41:07
20	MS. BREDEHOFT: Objection to the form of	12:41:10
21	the question, also calls for hearsay.	12:41:11
22	Go ahead.	12:41:13

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022.

16

1	A. I can't recall every conversation we had	12:41:15
2	regarding it or if there were many or what was	12:41:18
3	said.	12:41:21
4	Q. Can you recall anything that your sister	12:41:23
5	Amber said to you about the results of the UK	12:41:26
6	action?	12:41:29
7	MS. BREDEHOFT: Objection to the form of	12:41:30
8	the question.	12:41:31
9	Go ahead.	12:41:32
10	A. I can't recall specifics, no.	12:41:34
11	Q. Can you recall anything generally of	12:41:37
12	what she said to you?	12:41:38
13	MS. BREDEHOFT: Objection to the form of	12:41:41
14	the question.	12:41:43
15	Go ahead.	12:41:44
16	A. Mostly just relief that it was finished.	12:41:46
17	Q. Did you review any documents in	12:41:49
18	preparation for your deposition here today?	12:41:51
19	MS. BREDEHOFT: To the extent that that	12:41:55
20	calls for attorney-client communication or	12:41:57
21	anything at the direction with your counsel,	12:41:59
22	I would instruct you not to answer.	12:42:02

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

17

1	If you reviewed any documents outside of	12:42:04
2	that, you may answer.	12:42:06
3	A. I didn't. I did not.	12:42:09
4	Q. Did you review any of the transcripts of	12:42:16
5	testimony from the UK trial?	12:42:20
6	MS. BREDEHOFT: Objection.	12:42:25
7	To the extent that would call for any	12:42:26
8	attorney-client communication or directions,	12:42:29
9	I would instruct you not to answer.	12:42:31
10	To the extent you did outside of, you	12:42:35
11	may answer.	12:42:37
12	A. Nothing.	12:42:39
13	Q. Without asking you to disclose any	12:42:41
14	communications you had with Ms. Bredehoft or any	12:42:43
15	other attorney who represents you, how long in	12:42:47
16	total did you spend preparing for this deposition	12:42:50
17	here this morning?	12:42:54
18	MS. BREDEHOFT: To the extent that that	12:42:55
19	seeks any time spent with attorney-client --	12:42:57
20	with your attorneys, I would instruct you not	12:43:01
21	to answer that.	12:43:04
22	If you spent time preparing outside of	12:43:06

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

18

1	any communications with your counsel, you may	12:43:08
2	answer that.	12:43:10
3	A. I did not. Only with my counsel.	12:43:10
4	Q. All right. And I'll just put it on the	12:43:16
5	record, because I respectfully disagree with your	12:43:17
6	counsel -- if she tells you not to answer, don't	12:43:20
7	answer it, but I'll just put it on the record.	12:43:23
8	How long did you spend meeting with your	12:43:27
9	counsel to prepare for your testimony here today?	12:43:29
10	MS. BREDEHOFT: And I'm going to object	12:43:33
11	to the extent that that calls for	12:43:34
12	attorney-client communications and work	12:43:35
13	product.	12:43:37
14	And I would instruct you not to answer.	12:43:38
15	Q. Ms. Henriquez, you submitted witness	12:43:43
16	statements in the UK action; correct?	12:43:45
17	A. Yes, I did.	12:43:48
18	Q. And you submitted those witness	12:43:52
19	statements on behalf of the defendants in that	12:43:54
20	case, the Sun, Dan Wootton; correct?	12:43:56
21	MS. BREDEHOFT: Objection to the form of	12:43:59
22	the question.	12:44:00

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

19

1	Go ahead.	12:44:01
2	A. Correct.	12:44:02
3	Q. You didn't submit those statements on	12:44:05
4	behalf of Mr. Depp; correct?	12:44:06
5	MS. BREDEHOFT: Objection to the form of	12:44:10
6	the question.	12:44:11
7	Go ahead.	12:44:12
8	A. Correct. I did not for Mr. Depp.	12:44:13
9	Q. And, Ms. Henriquez, you also testified	12:44:18
10	in person at the trial in the UK; correct?	12:44:22
11	MS. BREDEHOFT: Objection to the form of	12:44:27
12	the question.	12:44:28
13	Go ahead.	12:44:29
14	A. I did appear in person, yes.	12:44:30
15	Q. And that in-person testimony was also on	12:44:32
16	behalf of the defendants in that case; correct?	12:44:35
17	MS. BREDEHOFT: Objection to the form of	12:44:38
18	the question.	12:44:39
19	Go ahead.	12:44:40
20	A. Yes, I did.	12:44:42
21	Q. And I'd like to very briefly discuss	12:44:43
22	your witness statements that you submitted in the	12:44:45

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

20

1	UK action. Those are the written statements as	12:44:47
2	opposed to your live testimony.	12:44:51
3	You understand that the witness	12:44:56
4	statements that you submitted in the UK action	12:44:57
5	were sworn statements; correct?	12:45:01
6	MS. BREDEHOFT: Objection to the form of	12:45:03
7	the question.	12:45:04
8	Go ahead.	12:45:05
9	A. I do understand that, yes.	12:45:06
10	Q. Did you personally write those	12:45:09
11	statements?	12:45:12
12	MS. BREDEHOFT: Objection.	12:45:15
13	To the extent that calls for	12:45:17
14	attorney-client communication or work	12:45:18
15	product, I would -- I would instruct you not	12:45:20
16	to answer.	12:45:25
17	But if you -- if you did so separate and	12:45:26
18	apart, you may answer that.	12:45:29
19	A. I did not. It was with assistance of	12:45:31
20	counsel.	12:45:37
21	Q. Which counsel assisted you in preparing	12:45:40
22	those sworn written witness statements in the UK	12:45:44

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

21

1	action?	12:45:48
2	MS. BREDEHOFT: I'm going to object	12:45:49
3	because that calls for attorney-client	12:45:50
4	communications and work product.	12:45:51
5	And I'm going to instruct you not to	12:45:53
6	answer.	12:45:54
7	MR. CHEW: Well, again, I'm not asking	12:45:57
8	for the substance of the communications. I'm	12:45:58
9	asking for the name of the attorney.	12:46:01
10	MS. BREDEHOFT: Which I believe is still	12:46:04
11	attorney-client communications and work	12:46:06
12	product, and I would still instruct her not	12:46:08
13	to answer.	12:46:10
14	MR. CHEW: All right. We'll mark that	12:46:11
15	part of the transcript.	12:46:12
16	BY MR. CHEW:	12:46:15
17	Q. Were you able to use your own words to	12:46:15
18	describe your experience in those witness	12:46:18
19	statements?	12:46:20
20	MS. BREDEHOFT: Objection to the form of	12:46:22
21	the question.	12:46:24
22	But go ahead, if you can answer it.	12:46:28

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

22

1	A. Yes, I did use my own words.	12:46:31
2	Q. Were you under any time constraints when	12:46:34
3	drafting any of those witness statements?	12:46:37
4	MS. BREDEHOFT: I'm going to object to	12:46:40
5	the form of the question.	12:46:43
6	But go ahead.	12:46:46
7	A. No, I was not.	12:46:47
8	Q. Did you ever tell anyone, in words or	12:46:48
9	substance, that the witness statements you	12:46:51
10	submitted in the UK actions did not accurately	12:46:52
11	reflect your experiences?	12:46:56
12	MS. BREDEHOFT: Objection to the form of	12:47:01
13	the question.	12:47:03
14	But go ahead.	12:47:04
15	A. I'm sorry. Can you rephrase.	12:47:05
16	Q. Sure.	12:47:06
17	Did you ever tell anyone that the	12:47:08
18	witness statements that you submitted in the UK	12:47:11
19	action were inaccurate in any way?	12:47:14
20	MS. BREDEHOFT: Same objection.	12:47:17
21	But go ahead.	12:47:18
22	A. There were two -- I can't remember.	12:47:19

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

23

1	There was a couple issues or small discrepancies	12:47:23
2	that were addressed in the UK proceedings, one	12:47:27
3	concerning a date, and I believe one concerning	12:47:30
4	the publication that a friend of mine worked on at	12:47:33
5	the time. But apart from those two statements or	12:47:38
6	those two -- just those two things, my -- I stand	12:47:42
7	by my testimony.	12:47:45
8	Q. And you've anticipated my next question.	12:47:48
9	You did change some of your written	12:47:52
10	testimony while you were on the stand testifying	12:47:53
11	live in the UK action; correct?	12:47:57
12	MS. BREDEHOFT: Objection to the form of	12:47:59
13	the question.	12:48:00
14	Go ahead.	12:48:02
15	A. There -- the date discrepancy was	12:48:04
16	something that I had realized, not at the very	12:48:06
17	moment that I was on the stand, but it was while I	12:48:11
18	was giving testimony or in that period when I was	12:48:14
19	giving testimony.	12:48:16
20	MR. CHEW: And if the -- the technician	12:48:17
21	would kindly call up what we've marked as	12:48:21
22	Exhibit 16 for identification.	12:48:24

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

24

1	(Exhibit 16 was marked for	12:48:30
2	identification and is attached to the	12:48:30
3	transcript.)	12:48:30
4	Q. I will represent to you, while he's	12:48:33
5	pulling it up, that this is your testimony from	12:48:35
6	July 23, 2020, day 13 of the proceedings.	12:48:39
7	And specifically, I would like to point	12:48:46
8	you to page 2112 which, mercifully, is on the	12:48:47
9	third page of Exhibit 16. Exactly.	12:48:58
10	Let me -- let me just read this to you	12:49:07
11	for the -- for the record.	12:49:09
12	Starting on page 2112, line 18,	12:49:11
13	Mr. Justice Nicol -- he was the judge; correct?	12:49:17
14	A. Yes, sir.	12:49:21
15	Q. "MR. JUSTICE NICOL: Ms. Wass, you be	12:49:22
16	Careful about not leading.	12:49:27
17	"MS. WASS: Yes.	12:49:30
18	"Can you, Ms. Henriquez, explain what it	12:49:32
19	is you would like to say about 8 March 2013	12:49:34
20	at paragraph 33."	12:49:36
21	And it says:	12:49:38
22	"THE WITNESS:"	12:49:39

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

25

1	That's you; correct?	12:49:40
2	MS. BREDEHOFT: Objection to the form of	12:49:42
3	the question.	12:49:43
4	But go ahead.	12:49:43
5	A. Yes, sir.	12:49:44
6	Q. And you say:	12:49:45
7	"THE WITNESS: So the incident that my	12:49:46
8	statement speaks to, I now attribute to a	12:49:48
9	later date in March, not 8 March.	12:49:51
10	"MR. WASS: Thank you.	12:49:54
11	"Shall I go to the next passage, my	12:49:57
12	Lord?	12:49:59
13	"MR. JUSTICE NICOL: Yes."	12:50:00
14	"Which is the next paragraph that you	12:50:02
15	want to" -- and this -- this is you, the	12:50:04
16	witness.	12:50:07
17	"THE WITNESS: Forgive me. I'm looking	12:50:08
18	for it right now, where I make specific	12:50:10
19	mention of it. It is paragraph 37.	12:50:12
20	"MS. WASS: Thank you.	12:50:14
21	"What aspect of paragraph 37 would you	12:50:16
22	like to speak to?"	12:50:18

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

26

1	And then you say:	12:50:19
2	"THE WITNESS: The painting where he	12:50:23
3	wrote Tasya van Pee, P-E-E, that is actually	12:50:25
4	in reference to a separate painting that he	12:50:30
5	defaced. There were two different paintings.	12:50:32
6	So I wanted clarification, the painting that	12:50:35
7	this evidence speaks to, this portion of my	12:50:38
8	evidence speaks to, rather, he did not	12:50:40
9	scribble out and say Tasya van Pee, he simply	12:50:43
10	tried to just burn the back of it."	12:50:47
11	Did I read that correctly?	12:50:50
12	MS. BREDEHOFT: Objection, improper use	12:50:52
13	of testimony and -- and I'm going to object	12:50:53
14	to the form of the question. There was	12:51:00
15	varied things within that that were	12:51:01
16	inappropriate. And also calls for hearsay in	12:51:04
17	some aspects of it.	12:51:08
18	But go ahead and answer.	12:51:10
19	A. I'm sorry. What was the original	12:51:12
20	question? I -- I see --	12:51:13
21	Q. I can ask you a better question.	12:51:15
22	That part of the passage that I just	12:51:18

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

27

1	read you that contained your testimony, did I read	12:51:20
2	it accurately?	12:51:22
3	MS. BREDEHOFT: Objection to the form of	12:51:24
4	the question. It's an improper use of	12:51:27
5	testimony and it calls for hearsay.	12:51:29
6	And go ahead.	12:51:32
7	A. Did you read it correctly? I see it	12:51:33
8	here, yes.	12:51:38
9	Q. And is -- and is what you clarified,	12:51:40
10	that passage I read of your testimony, was that	12:51:43
11	the correction that you referred to a moment ago	12:51:46
12	when you said you made a correction when you were	12:51:48
13	at trial, a correction to your witness statement?	12:51:51
14	Is that true?	12:51:54
15	MS. BREDEHOFT: Same objections. Still	12:51:55
16	improper use of the -- of the transcript, and	12:51:57
17	also calls for hearsay.	12:52:01
18	Go ahead.	12:52:03
19	A. That is one of the -- that is one of the	12:52:04
20	discrepancies, yes.	12:52:07
21	Q. But you had an opportunity to correct	12:52:08
22	that discrepancy prior to trial; correct?	12:52:11

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

28

1	MS. BREDEHOFT: Objection to the form of	12:52:16
2	the question and to the extent that it calls	12:52:16
3	for legal conclusions or communications with	12:52:18
4	counsel.	12:52:22
5	I would instruct you -- I would instruct	12:52:24
6	you not to answer if it involves	12:52:26
7	communications with counsel. If you're able	12:52:28
8	to answer it separately than that.	12:52:30
9	I am still objecting on the basis that	12:52:32
10	it calls for a legal conclusion and to the	12:52:33
11	form of the question.	12:52:37
12	Go ahead.	12:52:40
13	A. If you're instructing me not to answer,	12:52:40
14	I'm following my counsel's advice.	12:52:42
15	Q. She's not. She's just objecting to	12:52:45
16	form, saying that you're not -- you're not	12:52:47
17	competent to make a legal conclusion, but I'm not	12:52:49
18	asking for that.	12:52:52
19	I'm asking whether you had an	12:52:53
20	opportunity to correct any misstatement in your	12:52:57
21	written witness statement prior to your taking the	12:53:00
22	stand? True?	12:53:04

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

29

1	MS. BREDEHOFT: Again -- again, to the	12:53:05
2	extent that your answer would involve	12:53:06
3	attorney-client communications, I would	12:53:10
4	instruct you not to answer.	12:53:12
5	If you're able to answer it separate	12:53:14
6	from that, I'm preserving my other objections	12:53:16
7	on legal conclusion, hearsay, but you can	12:53:18
8	still answer.	12:53:21
9	A. I suppose.	12:53:23
10	Q. But, in fact, you never submitted any	12:53:25
11	amendment or correction to any of your written --	12:53:28
12	written witness statements; correct?	12:53:31
13	MS. BREDEHOFT: Objection to the form of	12:53:33
14	the question, calls for legal conclusion.	12:53:33
15	Go ahead.	12:53:36
16	A. It was something I hadn't realized.	12:53:38
17	Q. When did you realize that some of the	12:53:43
18	testimony in your sworn written statement was	12:53:45
19	incorrect?	12:53:48
20	MS. BREDEHOFT: Objection to the form of	12:53:49
21	the question.	12:53:50
22	Go ahead.	12:53:51

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

30

1	A.	When I was reviewing other things. When	12:53:52
2		I was looking at stuff on my phone, it was -- I	12:53:58
3		can't remember exactly how I came to the	12:54:04
4		conclusion, but at some point I realized I was	12:54:05
5		confusing the paintings.	12:54:08
6	Q.	And when you --	12:54:13
7	A.	I can't recall when it was.	12:54:14
8	Q.	When you had that epiphany, when was --	12:54:16
9		how much previous to July 23, 2020 was that?	12:54:20
10	MS. BREDEHOFT:	Objection to the form of	12:54:26
11		the question.	12:54:26
12		Go ahead.	12:54:27
13	A.	I didn't realize it prior to that date.	12:54:28
14		I can't recall the exact date of when it was	12:54:30
15		realized.	12:54:32
16	Q.	Is it your testimony that you discovered	12:54:34
17		the discrepancies on the morning of your actual	12:54:37
18		live, in-person testimony?	12:54:42
19	MS. BREDEHOFT:	Objection to the form of	12:54:45
20		the question.	12:54:45
21		Go ahead.	12:54:46
22	A.	I do not recall when I realized it. I	12:54:47

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

31

1 don't think it was that morning. 12:54:51

2 Q. It would have been -- do you have a 12:54:54

3 ballpark how many -- how many days prior to that 12:54:57

4 testimony did you realize that you had made errors 12:54:59

5 under oath? 12:55:03

6 MS. BREDEHOFT: Objection, calls for 12:55:04

7 speculation and hypothetical. Objection to 12:55:05

8 the form of the question. 12:55:07

9 Go ahead. 12:55:09

10 A. Again, I -- I can't give you a ballpark 12:55:11

11 or specifics. 12:55:13

12 Q. Putting aside the discrepancies about 12:55:16

13 which you've just testified, were there any 12:55:19

14 relevant details omitted from your witness 12:55:21

15 statements? 12:55:24

16 MS. BREDEHOFT: Objection to the form of 12:55:25

17 the question for a variety of reasons, 12:55:27

18 including your commentary, but also to the 12:55:28

19 fact that this is a grossly overbroad request 12:55:31

20 and calls for legal conclusions that this 12:55:34

21 witness would not be able to respond to, and 12:55:38

22 also to the extent that it calls for 12:55:41

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

32

1	attorney-client communications and work	12:55:42
2	product.	12:55:44
3	That, I will instruct you not to answer.	12:55:46
4	But you can answer if it's outside that.	12:55:48
5	A. I -- I can't. It's too broad. I'm	12:55:54
6	not -- I'm not sure a hundred percent what's being	12:55:56
7	asked exactly, so.	12:55:59
8	Q. Did you include everything important in	12:56:01
9	your sworn witness statement?	12:56:03
10	MS. BREDEHOFT: Objection to the form of	12:56:05
11	the question, calls for legal conclusions in	12:56:06
12	the term "important." And also to the extent	12:56:10
13	that it would call for any attorney-client	12:56:15
14	communications or work product, I would	12:56:17
15	instruct you not to answer on that basis, if	12:56:19
16	it does.	12:56:21
17	To the extent it's outside that, you may	12:56:23
18	answer.	12:56:25
19	A. I -- I -- I don't recall if -- I'm not	12:56:25
20	sure. I still don't know exactly if I'm supposed	12:56:38
21	to -- this is to the best of my knowledge. I'm --	12:56:41
22	I don't know if it includes every single minuscule	12:56:45

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

33

1	detail. There's no way to be able to tell that.	12:56:50
2	Q. Did you intend your sworn witness	12:56:53
3	statement to be complete and accurate?	12:56:55
4	MS. BREDEHOFT: Objection, that calls	12:56:57
5	for attorney -- that calls for legal	12:56:58
6	conclusion.	12:56:59
7	MR. CHEW: No, it doesn't.	12:57:00
8	MS. BREDEHOFT: Hold on.	12:57:01
9	MR. CHEW: No.	12:57:02
10	MS. BREDEHOFT: Please let me finish my	12:57:03
11	objection.	12:57:04
12	It calls for legal conclusions on what	12:57:05
13	would be relevant or important to the UK Sun	12:57:07
14	trial, and also to the extent that it would	12:57:12
15	call for attorney-client communications or	12:57:14
16	work product on what was asked or what was	12:57:16
17	answered, I would instruct you not to answer.	12:57:18
18	But if you can answer outside of that,	12:57:21
19	you may.	12:57:23
20	MR. CHEW: And I would object to the	12:57:24
21	coaching. You can object, but you can't	12:57:26
22	coach.	12:57:28

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

34

1	Q. The question was very simple. Did you	12:57:29
2	intend your sworn written statement submitted in	12:57:32
3	the UK action to be complete and accurate to the	12:57:36
4	best of your knowledge under oath and penalties of	12:57:40
5	perjury?	12:57:46
6	MS. BREDEHOFT: And again -- and, again,	12:57:46
7	I'm going to object that it calls for a legal	12:57:48
8	conclusion for this witness. And to the	12:57:50
9	extent that it calls for attorney-client	12:57:51
10	communications or work product, I would	12:57:53
11	ask -- would instruct you not to answer, if	12:57:55
12	that's what would be necessary for you to	12:57:58
13	answer the question.	12:58:00
14	If you can answer it without that, then	12:58:02
15	you may answer.	12:58:03
16	A. I completed it as truthfully and as	12:58:08
17	completely as I could in my capacity as a person.	12:58:10
18	Q. Ms. Henriquez, I'd like to shift gears a	12:58:15
19	little bit and ask you a little bit about your	12:58:17
20	childhood and growing up with -- with your sister.	12:58:20
21	Amber Heard is your older sister;	12:58:24
22	correct?	12:58:26

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

35

1	A. Yes, sir.	12:58:26
2	Q. And she is your full sister; that is,	12:58:30
3	you both share the same parents, mother and	12:58:35
4	father; correct?	12:58:38
5	MS. BREDEHOFT: Objection to the form of	12:58:40
6	the question.	12:58:40
7	But go ahead.	12:58:41
8	A. Yes, she is my full sister.	12:58:42
9	Q. Did you and Amber actually grow up in	12:58:44
10	the same household?	12:58:47
11	MS. BREDEHOFT: Objection to the form of	12:58:49
12	the question.	12:58:50
13	Go ahead.	12:58:51
14	A. Yes, we did.	12:58:53
15	Q. Who lived there with you and Amber?	12:58:54
16	MS. BREDEHOFT: Objection to the form of	12:58:58
17	the question.	12:58:58
18	Go ahead.	12:58:59
19	A. My father and my late mother.	12:59:01
20	Q. And -- and your late mother -- and I'm	12:59:04
21	very sorry about her passing -- that was Paige	12:59:08
22	Heard?	12:59:10

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

36

1	A. Yes, sir.	12:59:11
2	Q. And your father's still alive and he's	12:59:13
3	David Heard; correct?	12:59:15
4	A. Yes, sir.	12:59:18
5	Q. Did anyone other than your parents and	12:59:19
6	Amber live with you there in the house when you	12:59:22
7	were growing up?	12:59:25
8	MS. BREDEHOFT: Objection to the form of	12:59:27
9	the question.	12:59:27
10	Go ahead.	12:59:28
11	A. On a permanent basis, yes, it was just	12:59:29
12	us four.	12:59:34
13	Q. Did anyone live there on a partial	12:59:35
14	basis?	12:59:37
15	MS. BREDEHOFT: Objection to the form of	12:59:38
16	the question.	12:59:38
17	Go ahead.	12:59:40
18	A. At one point my grandmother lived with	12:59:43
19	us. That would be my father's mother. She lived	12:59:44
20	with us for a brief period of time. I -- I can't	12:59:49
21	recall specifically how long. I was very young.	12:59:53
22	Another point in time his older sister,	12:59:57

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

37

1	who is also called Amber Heard, she lived with us	01:00:00
2	for a brief period of time.	01:00:04
3	Other than that, apart from relatives	01:00:07
4	visiting or -- it was just -- it was just us four.	01:00:09
5	Q. Did any of your father's workers ever	01:00:16
6	live with you while in your household at any time?	01:00:18
7	MS. BREDEHOFT: Objection to the form of	01:00:21
8	the question.	01:00:22
9	Go ahead.	01:00:23
10	A. I -- yes. I apologize. I forgot. I	01:00:25
11	don't know his surname. I believe his first name	01:00:28
12	was Victor.	01:00:32
13	Q. Was Victor the only one of your father's	01:00:33
14	workers who lived with you all in the house for	01:00:36
15	some period of time?	01:00:38
16	MS. BREDEHOFT: Objection to the form of	01:00:40
17	the question.	01:00:41
18	Go ahead.	01:00:42
19	A. From what I can recall, yes.	01:00:43
20	Q. How long did Victor work -- live in the	01:00:45
21	house with you all?	01:00:48
22	MS. BREDEHOFT: Objection to the form of	01:00:50

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

38

1	the question.	01:00:51
2	Go ahead.	01:00:53
3	A. I honestly -- I can't recall.	01:00:54
4	Q. Do you -- you can't recall how long	01:00:57
5	Victor lived there. Do you recall in what year he	01:00:59
6	lived there or how old you were at the time?	01:01:03
7	MS. BREDEHOFT: Objection to the form of	01:01:06
8	the question.	01:01:07
9	Go ahead.	01:01:08
10	A. I cannot. I'm sorry.	01:01:10
11	Q. Do you, Ms. Henriquez, have any other	01:01:13
12	siblings other than Amber?	01:01:15
13	MS. BREDEHOFT: Objection to the form of	01:01:19
14	the question.	01:01:20
15	Go ahead.	01:01:21
16	A. We have an older half-sister.	01:01:22
17	Q. And what is her name?	01:01:25
18	A. Mara.	01:01:29
19	Q. How much older is Mara than you and	01:01:30
20	Amber?	01:01:34
21	A. I would say roughly 18 years older than	01:01:35
22	me, so she must be 17 years -- 17 or 16 years	01:01:46

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

39

1	older than Amber.	01:01:51
2	Q. And she is your father's biological	01:01:52
3	daughter; correct?	01:01:56
4	A. That is correct.	01:01:57
5	Q. Did Mara ever live in the same household	01:02:00
6	as you and Amber?	01:02:03
7	MS. BREDEHOFT: Objection to the form of	01:02:05
8	the question.	01:02:06
9	Go ahead.	01:02:07
10	A. Apart from summer visits, when she was	01:02:09
11	still at university she would come stay with us on	01:02:14
12	breaks, but she never lived with us for an	01:02:17
13	extended period of time. She lived with her	01:02:20
14	mother.	01:02:22
15	Q. Does she -- does Mara still have a	01:02:25
16	relationship with your father, David Heard?	01:02:28
17	MS. BREDEHOFT: Objection to the form of	01:02:30
18	the question and also calls for hearsay.	01:02:31
19	Go ahead.	01:02:34
20	A. She does.	01:02:34
21	Q. Is it a close relationship?	01:02:37
22	MS. BREDEHOFT: Objection to the form of	01:02:39

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

40

1	the question.	01:02:40
2	Go ahead.	01:02:41
3	A. I couldn't say, necessarily. I -- they	01:02:41
4	are close. They speak pretty regularly. You'd	01:02:49
5	have to ask them in terms of their closeness. I	01:02:54
6	wouldn't be able to speak to that.	01:02:57
7	Q. Does Mara have a relationship with your	01:02:59
8	sister Amber?	01:03:00
9	MS. BREDEHOFT: Objection to the form of	01:03:02
10	the question.	01:03:03
11	Go ahead.	01:03:04
12	A. Yes.	01:03:05
13	Q. Is it a close relationship?	01:03:08
14	MS. BREDEHOFT: Objection to the form of	01:03:10
15	the question.	01:03:11
16	Go ahead.	01:03:12
17	A. Yes.	01:03:13
18	Q. And -- and why do you characterize it as	01:03:16
19	close?	01:03:19
20	MS. BREDEHOFT: Objection to the form of	01:03:20
21	the question.	01:03:22
22	Go ahead.	01:03:23

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

41

1	A. She's our sister. They -- they speak	01:03:23
2	regularly. Amber and Mara are very supportive of	01:03:32
3	one another. They speak pretty often, from what I	01:03:37
4	understand.	01:03:41
5	But again, you would have to ask them in	01:03:41
6	terms of the degrees of closeness and what makes	01:03:43
7	them close. I can't speak to that.	01:03:47
8	Q. Do you personally have a relationship	01:03:50
9	with Mara?	01:03:52
10	MS. BREDEHOFT: Objection to the form of	01:03:53
11	the question.	01:03:54
12	Go ahead.	01:03:55
13	A. I do.	01:03:57
14	Q. When was the last time you spoke with	01:03:59
15	her?	01:04:00
16	A. Within the week. Less than a week ago.	01:04:01
17	Q. Did you talk about this deposition	01:04:12
18	coming up?	01:04:15
19	A. I did not.	01:04:16
20	We were discussing the birth of my	01:04:19
21	daughter, and she was planning on coming out.	01:04:21
22	That's what we spoke about mostly.	01:04:25

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

42

1	Q.	When was the last time you saw Mara?	01:04:27
2	A.	I want to say April of last year.	01:04:29
3	Q.	How would you describe the household	01:04:42
4		that you and Amber grew up in with your parents?	01:04:44
5	MS. BREDEHOFT:	Objection to the form of	01:04:48
6		the question.	01:04:49
7		Go ahead.	01:04:50
8	A.	I'm sorry, Mr. Chew, could you be a	01:04:51
9		little bit more specific?	01:04:57
10	Q.	Well, that's fair.	01:04:59
11		Was it a -- did you have a happy	01:05:00
12		childhood growing up with Amber and your parents	01:05:02
13		in Texas?	01:05:06
14	MS. BREDEHOFT:	Objection to the form	01:05:07
15		of -- I'm sorry. I'm sorry, Mr. Chew, I	01:05:08
16		interrupted you.	01:05:10
17	MR. CHEW:	Yeah. Let me just restate	01:05:11
18		it.	01:05:13
19	BY MR. CHEW:		01:05:13
20	Q.	I mean, did you have a happy childhood	01:05:14
21		growing up with your sister and parents in Texas?	01:05:17
22	MS. BREDEHOFT:	Objection to the form of	01:05:21

R

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

43

R	1	the question.	01:05:22
	2	Go ahead.	01:05:23
	3	A. It wasn't perfect, but it was a very	01:05:26
	4	normal -- it was family. It was a family dynamic.	01:05:31
	5	It had happy moments, it had less-than-happy	01:05:35
	6	moments. I don't know how else to categorize it.	01:05:37
	7	I don't think any family dynamic can	01:05:43
	8	just be described simply as good or bad, happy or	01:05:46
	9	sad. It was a -- it was a fair mixture of both.	01:05:50
	10	Q. Did you at any time experience any	01:05:53
	11	physical abuse by anyone in your family, meaning	01:05:56
	12	Amber, your father or your mother?	01:06:00
	13	MS. BREDEHOFT: Objection to the form of	01:06:03
	14	the question.	01:06:04
	15	Go ahead.	01:06:05
	16	A. Never -- never at the hands of my mother	01:06:05
	17	or my sister, but occasionally our father was	01:06:13
	18	rough with us.	01:06:19
	19	Q. When you say your father was "rough with	01:06:21
	20	us," how was your father, David, rough with you?	01:06:23
	21	MS. BREDEHOFT: Objection to the form of	01:06:30
	22	the question.	01:06:30

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

44

R	1	Go ahead.	01:06:32
	2	A. We were occasionally struck with	01:06:32
	3	objects -- hands, belts. There were absolutely	01:06:42
	4	times when we were fearful of him. But it was --	01:06:50
	5	it was just heavy discipline.	01:06:57
	6	Q. Now, I know this is painful and I'm	01:07:01
	7	going to try to go through it quickly, but I -- I	01:07:03
	8	want to do it in kind of an organized way. So --	01:07:07
	9	and it's painful, and I understand that, but I	01:07:10
	10	want to stick to you right now, and then I'm going	01:07:13
	11	to move to your sister.	01:07:16
	12	So is it your testimony that your	01:07:20
	13	father, David, struck you with objects? Is that	01:07:23
	14	true?	01:07:27
	15	MS. BREDEHOFT: Objection to the form of	01:07:29
	16	the question.	01:07:29
	17	Go ahead.	01:07:31
	18	A. Belts.	01:07:37
	19	Q. Okay. Anything other than belts that he	01:07:37
	20	struck you with?	01:07:41
	21	MS. BREDEHOFT: Objection to the form of	01:07:43
	22	the question.	01:07:44

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

45

R	1	Go ahead.	01:07:45
	2	A. Hands.	01:07:45
	3	Q. Anything other than belts and hands?	01:07:52
	4	MS. BREDEHOFT: Objection to the form of	01:07:55
	5	the question.	01:07:57
	6	Go ahead.	01:07:58
	7	A. No.	01:07:58
	8	Q. How often would he hit you with a belt?	01:08:06
	9	MS. BREDEHOFT: Objection to the form of	01:08:13
	10	the question.	01:08:13
	11	Go ahead.	01:08:14
	12	A. I can't recall specifically.	01:08:16
	13	Q. What can you recall generally?	01:08:18
	14	MS. BREDEHOFT: Objection to the form of	01:08:22
	15	the question.	01:08:22
	16	Go ahead.	01:08:24
	17	A. I'm sorry, Mr. Chew. It's not something	01:08:26
	18	I can quantify. I can't recall how often it	01:08:28
	19	happened or -- I'm sorry, I can't recall how	01:08:33
	20	often.	01:08:39
	21	Q. I'm not going to dwell on this. I'm	01:08:40
	22	just -- I'm just trying to get some sense.	01:08:42

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

46

R	1	Would it be fair to say that he hit you	01:08:44
	2	with a belt on more than five occasions during	01:08:46
	3	your entire childhood?	01:08:49
	4	MS. BREDEHOFT: Objection to the form of	01:08:51
	5	the question.	01:08:53
	6	Go ahead.	01:08:54
	7	A. Yes.	01:08:55
	8	Q. Would he -- did he do that more than ten	01:08:59
	9	times?	01:09:02
	10	MS. BREDEHOFT: Objection to the form of	01:09:03
	11	the question.	01:09:04
	12	Go ahead.	01:09:05
	13	A. I'd have to say yes.	01:09:06
	14	Q. More than 20 times?	01:09:23
	15	MS. BREDEHOFT: Objection to the form of	01:09:25
	16	the question.	01:09:26
	17	Go ahead.	01:09:27
	18	A. I honestly can't give a number to this.	01:09:27
	19	I apologize. I don't recall.	01:09:30
	20	Q. But --	01:09:33
	21	A. I can't give you a number.	01:09:34
	22	Q. But more than ten; correct?	01:09:35

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

47

1	MS. BREDEHOFT: Objection to the form of	01:09:37
2	the question.	01:09:38
3	Go ahead.	01:09:39
4	A. Yes.	01:09:39
5	Q. So on those occasions where he hit you	01:09:43
6	with a belt, where on your body did he hit you	01:09:46
7	with the belt?	01:09:51
8	MS. BREDEHOFT: Objection to the form of	01:09:52
9	the question.	01:09:53
10	Go ahead.	01:09:54
11	A. At various -- various points. It wasn't	01:09:54
12	a specific target.	01:10:02
13	Q. So it was something other than your	01:10:05
14	bottom?	01:10:07
15	MS. BREDEHOFT: Objection to the form of	01:10:09
16	the question.	01:10:10
17	Go ahead.	01:10:11
18	A. Occasionally.	01:10:11
19	Q. How old were you on the last occasion	01:10:19
20	that he hit you with a belt?	01:10:23
21	MS. BREDEHOFT: Objection to the form of	01:10:28
22	the question.	01:10:29

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

48

1	Go ahead.	01:10:30
2	A. I can't recall my age. I was -- I was	01:10:31
3	very young, but I -- I can't recall how old I was.	01:10:35
4	Q. No. I apologize if I were unclear. And	01:10:39
5	maybe I asked it backwards.	01:10:41
6	So maybe I should ask it this way: How	01:10:43
7	old were you the first time that he hit you with a	01:10:45
8	belt?	01:10:48
9	MS. BREDEHOFT: Objection to the form of	01:10:49
10	the question.	01:10:50
11	Go ahead.	01:10:51
12	A. That, I absolutely don't recall.	01:10:51
13	Q. How old were you the last time he hit	01:10:56
14	you with a belt?	01:10:59
15	MS. BREDEHOFT: Objection to the form of	01:11:00
16	the question.	01:11:01
17	Go ahead.	01:11:02
18	A. I don't recall.	01:11:02
19	Q. How often did he hit you with his hands?	01:11:10
20	MS. BREDEHOFT: Objection to the form of	01:11:13
21	the question.	01:11:14
22	Go ahead.	01:11:15

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

49

1	A.	I don't recall.	01:11:15
2	Q.	More than ten times as with the belt?	01:11:21
3	MS. BREDEHOFT:	Same objection, to the	01:11:25
4		form of the question.	01:11:27
5		Go ahead.	01:11:28
6	A.	I don't think it was more than ten	01:11:30
7		times.	01:11:32
8	Q.	Was it more than five times?	01:11:32
9	MS. BREDEHOFT:	Objection to the form of	01:11:35
10		the question.	01:11:35
11		Go ahead.	01:11:37
12	A.	Perhaps.	01:11:39
R 13	Q.	When he hit you with his hands, where	01:11:42
14		did he hit you?	01:11:44
15	MS. BREDEHOFT:	Objection to the form of	01:11:47
16		the question.	01:11:48
17		Go ahead.	01:11:49
18	A.	Primarily on our bottom.	01:11:50
19	Q.	And -- and, again, I'm just speaking	01:11:59
20		with you.	01:12:01
21		So he hit you on your bottom. Did he	01:12:01
22		ever hit you with his hands on any other part of	01:12:04

R	1	your body?	01:12:07
	2	MS. BREDEHOFT: Objection to the form of	01:12:08
	3	the question.	01:12:08
	4	Go ahead.	01:12:09
	5	A. Yes.	01:12:12
	6	Q. Where did he hit you?	01:12:13
	7	MS. BREDEHOFT: Objection to the form of	01:12:15
	8	the question.	01:12:16
	9	Go ahead.	01:12:17
	10	A. My face.	01:12:18
	11	Q. How many times did he hit your face with	01:12:25
	12	his hands?	01:12:28
	13	MS. BREDEHOFT: Objection to the form of	01:12:29
	14	the question.	01:12:30
	15	Go ahead.	01:12:32
	16	A. I don't recall.	01:12:33
	17	Q. More than once?	01:12:36
	18	MS. BREDEHOFT: Objection to the form of	01:12:39
	19	the question.	01:12:40
	20	Go ahead.	01:12:42
	21	A. Yes.	01:12:43
	22	Q. More than five times?	01:12:44

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

51

1	MS. BREDEHOFT: Objection to the form of	01:12:47
2	the question.	01:12:48
3	Go ahead.	01:12:51
4	A. No.	01:12:52
5	Q. Now moving to your sister Amber, did you	01:12:56
6	ever see your father strike Amber with a belt?	01:12:59
7	MS. BREDEHOFT: Objection to the form of	01:13:07
8	the question.	01:13:08
9	Go ahead.	01:13:09
10	A. Yes.	01:13:09
11	Q. On how many occasions did you see your	01:13:14
12	father strike Amber with a belt?	01:13:17
13	MS. BREDEHOFT: Objection to the form of	01:13:21
14	the question.	01:13:22
15	Go ahead.	01:13:23
16	A. I can't recall.	01:13:26
17	Q. More than five times?	01:13:27
18	MS. BREDEHOFT: Same objection.	01:13:30
19	Go ahead.	01:13:31
20	A. Yes.	01:13:33
21	Q. More than ten times?	01:13:35
22	MS. BREDEHOFT: Same objection.	01:13:37

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

52

1	Go ahead.	01:13:38
2	A. I don't recall.	01:13:38
R 3	Q. Did you ever see your father, David	01:13:46
4	Heard, hit Amber with his hands?	01:13:49
5	MS. BREDEHOFT: Objection to the form of	01:13:53
6	the question.	01:13:54
7	Go ahead.	01:13:55
8	A. Yes.	01:13:55
9	Q. How many times did he hit her with his	01:14:02
10	hands?	01:14:04
11	MS. BREDEHOFT: Same objection.	01:14:05
12	Go ahead.	01:14:07
13	A. I can't recall.	01:14:07
14	Q. Was it more than five times?	01:14:10
15	MS. BREDEHOFT: Same objection.	01:14:12
16	Go ahead.	01:14:13
17	A. I -- I can't recall.	01:14:14
18	Q. Other than hitting her with -- where --	01:14:18
19	on what part of her body did your father hit	01:14:21
20	Amber?	01:14:26
21	MS. BREDEHOFT: Objection to the form of	01:14:27
22	the question.	01:14:28

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

53

1	Go ahead.	01:14:29
2	A. On her -- on her bottom. Yeah.	01:14:39
3	Q. Did he also hit her on other parts of	01:14:48
4	her body?	01:14:51
5	MS. BREDEHOFT: Objection to the form of	01:14:54
6	the question.	01:14:55
7	Go ahead.	01:14:56
8	A. Not that I can recall.	01:14:57
9	Q. Well, you testified that he hit you in	01:15:00
10	the face. Did he ever hit Amber in the face?	01:15:02
11	MS. BREDEHOFT: Objection to the form of	01:15:05
12	the question.	01:15:06
13	Go ahead.	01:15:07
14	A. I do recall him hitting me in the face.	01:15:09
15	I do not recall him hurt -- hitting her in the	01:15:11
16	face.	01:15:14
17	Q. So you don't know whether he might have	01:15:15
18	broken her nose when he hit her in the face?	01:15:16
19	MS. BREDEHOFT: Objection to the form of	01:15:20
20	the question.	01:15:20
21	Go ahead.	01:15:21
22	A. I've never seen him hit her in the face.	01:15:22

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

54

1	Q. Did you ever witness your father hitting	01:15:28
2	your mother with his hands, with a belt or any	01:15:32
3	other object?	01:15:36
4	MS. BREDEHOFT: Objection to the form of	01:15:38
5	the question.	01:15:39
6	Go ahead.	01:15:40
7	A. I never witnessed him strike my mother.	01:15:41
8	I have -- I once witnessed him push her against a	01:15:48
9	fridge. But I have not seen him strike her, no.	01:15:53
10	Q. Was she injured when your father pushed	01:16:00
11	her against the fridge?	01:16:03
12	MS. BREDEHOFT: Objection to the form of	01:16:05
13	the question.	01:16:06
14	Go ahead.	01:16:07
15	A. I don't recall. I was very young.	01:16:07
16	Q. How tall a man is your father?	01:16:16
17	MS. BREDEHOFT: Objection to the form of	01:16:19
18	the question.	01:16:20
19	Go ahead.	01:16:21
20	A. I believe he is -- he was 6'2 at his	01:16:23
21	prime. He -- now he's probably closer to 6 feet.	01:16:30
22	Q. How much did he weigh at the time when	01:16:35

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

55

1	you were growing up?	01:16:37
2	MS. BREDEHOFT: Objection to the form of	01:16:39
3	the question.	01:16:39
4	Go ahead.	01:16:41
5	A. I have no way of knowing how much he	01:16:42
6	weighed.	01:16:46
7	Q. Do you know how much he weighs now?	01:16:47
8	MS. BREDEHOFT: Objection to the form of	01:16:49
9	the question.	01:16:49
10	Go ahead.	01:16:51
11	A. I do not.	01:16:52
12	Q. When you were a kid -- when you were a	01:16:54
13	child, was he -- would you characterize him as	01:16:58
14	thin, heavy or about normal?	01:17:02
15	MS. BREDEHOFT: Objection to the form of	01:17:06
16	the question.	01:17:07
17	Go ahead.	01:17:08
18	A. I would say he was very average. He's	01:17:11
19	slightly heavier now, but I think growing up he --	01:17:16
20	I think he would -- he fell into the very average	01:17:19
21	category.	01:17:22
22	Q. So at 6'2" tall and average, would it be	01:17:23

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

56

1	fair to say he was probably between 190 and 200	01:17:27
2	pounds?	01:17:32
3	MS. BREDEHOFT: Objection to the form of	01:17:32
4	the question, calls for speculation,	01:17:33
5	hypothetical.	01:17:35
6	Go ahead.	01:17:36
7	A. I'm sorry. I really -- I'm so bad with	01:17:37
8	quantifying that stuff. I wouldn't be able to	01:17:39
9	tell you, with any certainty, how much he might	01:17:42
10	have weighed.	01:17:44
11	Q. But he was a big guy?	01:17:46
12	MS. BREDEHOFT: Objection to the form of	01:17:48
13	the question.	01:17:49
14	Go ahead.	01:17:50
15	A. Bigger than us, for sure.	01:17:50
16	Q. Yeah.	01:17:55
17	A. I...	01:17:55
18	Q. Did your mother ever tell you that her	01:17:56
19	husband, your father, had physically abused her,	01:18:02
20	hit her?	01:18:07
21	MS. BREDEHOFT: Objection. Objection to	01:18:08
22	the form of the question.	01:18:09

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

57

1	Go ahead.	01:18:10
2	A. No, she never did.	01:18:11
3	Q. Did you ever witness any other physical	01:18:15
4	abuse in your household other than what you've	01:18:17
5	just described for us?	01:18:19
6	MS. BREDEHOFT: Objection to the form of	01:18:21
7	the question.	01:18:22
8	Go ahead.	01:18:23
9	A. No.	01:18:24
10	Q. Did you and Amber ever have physical	01:18:27
11	fight when you were growing up as kids living	01:18:33
12	with your parents in Texas?	01:18:36
13	MS. BREDEHOFT: Objection to the form of	01:18:38
14	the question.	01:18:39
15	Go ahead.	01:18:40
16	A. When we were young children, I have less	01:18:41
17	memory of any sort of, like, physical spats, but	01:18:47
18	I'm told that we were -- we were like any other	01:18:51
19	young kids, but I -- I don't recall specific	01:18:57
20	instances or anything.	01:19:01
21	But we were very close in age. We're	01:19:03
22	only a year apart -- a little more than a year	01:19:05

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

58

1 apart. But no, I don't recall specific instances.

01:19:08

2 But we were just two sisters, like any other.

01:19:13

R

3 Q. Growing up, did either of your parents
4 have any substance abuse issues?

01:19:19

01:19:21

5 MS. BREDEHOFT: Objection to the form of
6 the question.

01:19:23

01:19:24

7 Go ahead.

01:19:25

8 A. Yes.

01:19:26

9 Q. And what substance abuses, if any, did
10 your father have?

01:19:31

01:19:33

11 MS. BREDEHOFT: Objection to the form of
12 the question.

01:19:35

01:19:35

13 Go ahead.

01:19:36

14 A. Alcohol, various prescription
15 medication. As far as, like, illegal substances,
16 I wouldn't be able to say with any certainty if
17 that was a thing when we were children, but I know
18 for sure, at least while we were in the house, it
19 was alcohol and prescription medication.

01:19:37

01:19:45

01:19:54

01:19:57

01:20:00

01:20:02

20 Q. And is it your opinion, sitting here
21 today, that your father abused alcohol and
22 prescription medications?

01:20:04

01:20:07

01:20:10

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

59

R	1	MS. BREDEHOFT: Objection to the form of	01:20:12
	2	the question, calls for speculation,	01:20:13
	3	hypothetical and expertise.	01:20:15
	4	Go ahead.	01:20:17
	5	A. Yes.	01:20:19
	6	Q. How often would your father abuse	01:20:24
	7	alcohol?	01:20:26
	8	MS. BREDEHOFT: Objection to the form of	01:20:27
	9	the question.	01:20:28
	10	Go ahead.	01:20:29
	11	A. He had various bouts of sobriety, but	01:20:29
	12	his -- it was just on and off. I couldn't	01:20:42
	13	quantify a specific number for you because there	01:20:45
	14	were periods where he was sober for a number of	01:20:47
	15	years and then periods where he wasn't, so it's	01:20:50
	16	hard for me to quantify.	01:20:54
	17	Q. Did his abuse of alcohol coincide with	01:20:57
	18	the times that he would hit you with his hands or	01:21:01
	19	with a belt?	01:21:04
	20	MS. BREDEHOFT: Objection to the form of	01:21:07
	21	the question.	01:21:08
	22	Go ahead.	01:21:09

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

60

1	A. Yes.	01:21:10
2	Q. And with respect to his abuse of	01:21:12
3	prescription medication, was that a -- a constant	01:21:14
4	problem or was that just a problem at certain	01:21:18
5	times?	01:21:20
6	MS. BREDEHOFT: Objection to the form of	01:21:22
7	the question.	01:21:22
8	Go ahead.	01:21:23
9	A. That one's a little bit harder for me to	01:21:25
10	recall because just the nature of taking a pill is	01:21:28
11	so much less obvious than taking a drink. So I	01:21:32
12	wouldn't be able to say with any certainty the	01:21:35
13	duration or time that that was an issue.	01:21:37
14	Q. That's -- that's a fair point.	01:21:43
15	Did your father's abuse of alcohol also	01:21:45
16	coincide with the times where he hit your sister	01:21:53
17	with his hands or with a belt?	01:21:58
18	MS. BREDEHOFT: Objection to the form of	01:22:01
19	the question.	01:22:02
20	Go ahead.	01:22:03
21	A. Are you asking if his alcohol	01:22:04
22	contributed to those instances?	01:22:08

R

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

61

R	1	Q. Yes.	01:22:10
	2	A. I would have to agree.	01:22:10
	3	Q. Did your mother have any substance abuse	01:22:15
	4	problems in your observation?	01:22:20
	5	MS. BREDEHOFT: Objection to the form of	01:22:24
	6	the question.	01:22:24
	7	Go ahead.	01:22:25
	8	A. Yes.	01:22:26
	9	Q. And what substances did she abuse?	01:22:30
	10	MS. BREDEHOFT: Objection to the form of	01:22:33
	11	the question.	01:22:34
	12	Go ahead.	01:22:35
	13	A. Alcohol, primarily.	01:22:36
	14	Q. Anything else?	01:22:44
	15	MS. BREDEHOFT: Objection to the form of	01:22:47
	16	the question.	01:22:48
	17	Go ahead.	01:22:49
	18	A. Not that I would recall.	01:22:50
	19	Q. How often, in your recollection, did	01:22:56
	20	your mother abuse alcohol, drink to excess?	01:23:00
	21	MS. BREDEHOFT: Objection to the form of	01:23:05
	22	the question.	01:23:05

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

62

1	Go ahead.	01:23:06
2	A. My mother actually never did -- I'd	01:23:07
3	never seen her drunk. To the day she died, she	01:23:13
4	never drank in excess. She just drank a good	01:23:18
5	amount throughout the day, but I never saw her	01:23:21
6	inebriated or unsteady on her feet or anything	01:23:24
7	like that.	01:23:29
8	Q. Did either your mother or your father	01:23:29
9	ever serve alcohol to you or Amber while you were	01:23:32
10	under age, under the age of 18?	01:23:36
11	MS. BREDEHOFT: Objection to the form of	01:23:40
12	the question.	01:23:41
13	Go ahead.	01:23:42
14	A. No.	01:23:42
15	Q. Growing up, when was the first time that	01:23:43
16	you saw your sister Amber consume alcohol?	01:23:47
17	MS. BREDEHOFT: Objection to the form of	01:23:51
18	the question.	01:23:52
19	Go ahead.	01:23:53
20	A. I don't recall how -- when -- when that	01:23:53
21	was or how old we were.	01:24:00
22	Q. And putting aside how old you were, what	01:24:02

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

63

1 type of alcohol did you see her consume? 01:24:04

2 MS. BREDEHOFT: Objection to the form of 01:24:07

3 the question. 01:24:08

4 Go ahead. 01:24:09

5 A. I honestly can't recall. I don't know. 01:24:11

6 Q. I'm sorry. I didn't mean to step over 01:24:16

7 you. 01:24:18

8 When was the first time you saw Amber 01:24:19

9 consume a nonprescription drug? 01:24:21

10 MS. BREDEHOFT: Objection to the form of 01:24:26

11 the question. 01:24:26

12 Go ahead. 01:24:28

13 A. I can't recall. 01:24:29

14 Q. So you don't know how old she was at the 01:24:32

15 time? 01:24:34

16 MS. BREDEHOFT: Same objection. 01:24:36

17 Go ahead. 01:24:37

18 A. I don't recall instances of me seeing 01:24:39

19 her take drugs for -- I don't recall. 01:24:42

R 20 Q. What -- what non-prescription drugs have 01:24:52

21 you seen Amber use? 01:24:55

22 MS. BREDEHOFT: Objection to the form of 01:24:58

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

64

R	1	the question.	01:24:59
	2	Go ahead.	01:25:00
	3	A. In the entirety of our -- of how long	01:25:00
	4	I've known her or --	01:25:06
	5	Q. Yes. Yes. I'm broadening it out now,	01:25:08
	6	yes.	01:25:11
	7	MS. BREDEHOFT: Objection to the form of	01:25:12
	8	the question.	01:25:13
	9	Go ahead.	01:25:14
	10	A. I'm sorry. What illegal drugs have I	01:25:14
	11	seen her consume?	01:25:16
	12	Q. Yes.	01:25:18
	13	MS. BREDEHOFT: Same objection to the	01:25:19
	14	form of the question.	01:25:20
	15	Go ahead.	01:25:21
	16	A. I've seen her take MDMA. I've seen her	01:25:22
	17	take mushrooms on occasion. Cocaine, when we were	01:25:32
	18	much younger. But other than that, I -- I can't	01:25:41
	19	recall anything else.	01:25:46
	20	Q. Have you ever seen her use	01:25:47
	21	methamphetamines?	01:25:49
	22	MS. BREDEHOFT: Objection to the form of	01:25:51

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

65

1	the question.	01:25:52
2	Go ahead.	01:25:54
3	A. No.	01:25:55
4	Q. And you said you've seen her use	01:25:57
5	cocaine. How many times have you seen your sister	01:25:59
6	Amber use cocaine?	01:26:04
7	MS. BREDEHOFT: Objection to the form of	01:26:05
8	the question.	01:26:06
9	Go ahead.	01:26:07
10	A. Very minimal. I would say less than --	01:26:08
11	less than -- much less than five times.	01:26:13
12	Q. You --	01:26:17
13	A. I don't have much experience with that	01:26:18
14	at all with her.	01:26:19
15	Q. Just to be clear, your testimony is that	01:26:22
16	you've -- you've seen her use cocaine; correct?	01:26:24
17	MS. BREDEHOFT: Objection to the form of	01:26:27
18	the question.	01:26:28
19	Go ahead.	01:26:29
20	A. A very, very, very long time ago when we	01:26:31
21	first moved out here. We were still teenagers,	01:26:35
22	technically.	01:26:38

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

66

1	Q. And -- and on how many occasions were	01:26:40
2	you with her when she used cocaine?	01:26:42
3	MS. BREDEHOFT: Objection to the form of	01:26:46
4	the question.	01:26:46
5	Go ahead.	01:26:48
6	A. I couldn't tell you. It was -- like I	01:26:51
7	said, it was very, very few.	01:26:53
8	Q. But it's possible she used cocaine when	01:26:56
9	you were not with her; correct?	01:26:58
10	MS. BREDEHOFT: Objection to the form of	01:27:00
11	the question, calls for hearsay.	01:27:00
12	Go ahead.	01:27:05
13	A. Sure.	01:27:06
14	Q. Have you ever seen her use marijuana?	01:27:08
15	MS. BREDEHOFT: Objection to the form of	01:27:11
16	the question.	01:27:12
17	Go ahead.	01:27:13
18	A. I can't recall seeing her -- witnessing	01:27:14
19	it personally. I know she has smoked marijuana at	01:27:21
20	one point or another, but I personally have never	01:27:24
21	witnessed it.	01:27:27
22	Q. And how many times have you seen her use	01:27:29

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

67

1	psychedelic mushrooms?	01:27:33
2	MS. BREDEHOFT: Objection to the form of	01:27:35
3	the question.	01:27:36
4	Go ahead.	01:27:38
5	A. That's also very -- I think, personally,	01:27:39
6	I've only seen it once or twice.	01:27:41
7	Q. But it's possible she could have used it	01:27:46
8	on other occasions that you did not actually	01:27:48
9	witness; correct?	01:27:51
10	MS. BREDEHOFT: Objection to the form of	01:27:52
11	the question, calls for speculation and	01:27:53
12	hypothetical.	01:27:55
13	Go ahead.	01:27:56
14	A. I suppose.	01:27:57
15	Q. When Amber was in school, did she have a	01:28:03
16	friend named Kaitlyn, K-A-I-T-L-Y-N?	01:28:06
17	MS. BREDEHOFT: Objection to the form of	01:28:12
18	the question.	01:28:13
19	Go ahead.	01:28:14
20	A. I'm trying to remember. My apologies.	01:28:25
21	That sounds familiar, yes.	01:28:28
22	Q. Was Kaitlyn a friend of Amber's from	01:28:29

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

68

1	school?	01:28:32
2	MS. BREDEHOFT: Objection to the form of	01:28:32
3	the question.	01:28:33
4	Go ahead.	01:28:34
5	A. If memory serves, yes.	01:28:34
6	Q. Do you know when -- I'm sorry. Had you	01:28:36
7	finished your answer?	01:28:40
8	A. Oh, I was just saying if -- if it's the	01:28:41
9	same person I'm thinking of, then, yes, they were	01:28:43
10	classmates, I believe.	01:28:46
11	Q. Do you know how old Amber and Kaitlyn	01:28:48
12	were when they became friends?	01:28:50
13	MS. BREDEHOFT: Objection to the form of	01:28:56
14	the question.	01:28:57
15	Go ahead.	01:28:59
16	A. I wouldn't be able to tell you	01:28:59
17	definitively, no.	01:29:01
18	Q. Did Kaitlyn ever come over to your	01:29:02
19	house?	01:29:04
20	MS. BREDEHOFT: Objection to the form of	01:29:05
21	the question.	01:29:05
22	Go ahead.	01:29:06

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

69

1	A. I can't recall, honestly. I'm sorry.	01:29:07
2	I -- I don't know.	01:29:14
3	Again, if it's the same person I'm	01:29:15
4	thinking of, I might have seen her at the house,	01:29:17
5	but I don't know if she spent the night or	01:29:19
6	anything.	01:29:21
7	Q. Did there come a time when Amber and	01:29:21
8	Kaitlyn had a falling out?	01:29:24
9	MS. BREDEHOFT: Objection to the form of	01:29:31
10	the question.	01:29:32
11	Go ahead.	01:29:33
12	A. I don't know. You would have to ask	01:29:33
13	her.	01:29:35
14	Q. Did your sister ever tell you about	01:29:35
15	having a falling out with Kaitlyn?	01:29:37
16	MS. BREDEHOFT: Objection to the form of	01:29:40
17	the question.	01:29:40
18	Go ahead.	01:29:41
19	A. Not that I can recall.	01:29:42
20	Q. Did you ever speak with Kaitlyn about	01:29:50
21	any falling out between her and your sister Amber?	01:29:52
22	MS. BREDEHOFT: Objection to the form of	01:29:56

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

70

1	the question.	01:29:57
2	Go ahead.	01:29:58
3	A. I would have to say no. I'm not even a	01:29:58
4	hundred percent sure if I remember who this person	01:30:01
5	is.	01:30:04
6	Q. Was Amber also friends with someone	01:30:05
7	named Logan?	01:30:08
8	MS. BREDEHOFT: Objection to the form of	01:30:09
9	the question.	01:30:10
10	Go ahead.	01:30:11
11	A. Yes.	01:30:11
12	Q. Who was Logan?	01:30:12
13	MS. BREDEHOFT: Objection to the form of	01:30:14
14	the question.	01:30:15
15	Go ahead.	01:30:16
16	A. Logan was a -- a dear friend of -- he	01:30:16
17	initially started off as Amber's friend. They	01:30:23
18	worked together at a pool, I believe. They were	01:30:27
19	both lifeguards. And he very quickly got close	01:30:30
20	with us and our family. And he passed away in a	01:30:37
21	car accident.	01:30:42
22	Q. How old was he when he met Amber?	01:30:47

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

71

1	MS. BREDEHOFT: Objection to the form of	01:30:50
2	the question.	01:30:51
3	Go ahead.	01:30:52
4	A. I don't recall. I don't know that -- I	01:30:52
5	don't know the answer to that.	01:30:57
6	Q. Well, he was older than Amber, wasn't	01:30:59
7	he?	01:31:02
8	MS. BREDEHOFT: Objection to the form of	01:31:03
9	the question.	01:31:03
10	Go ahead.	01:31:04
11	A. I'm actually not sure.	01:31:06
12	Q. And did there come a time when Amber and	01:31:09
13	Logan's relationship became romantic?	01:31:11
14	MS. BREDEHOFT: Objection to the form of	01:31:16
15	the question.	01:31:17
16	Go ahead.	01:31:18
17	A. Not to my knowledge.	01:31:19
18	Q. You mentioned that Logan passed away.	01:31:21
19	When did he pass away?	01:31:23
20	MS. BREDEHOFT: Objection to the form of	01:31:26
21	the question.	01:31:27
22	Go ahead.	01:31:27

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

72

1	A.	I don't recall when it was specifically.	01:31:30
2	Q.	Do you know how old Logan was when he	01:31:34
3		died?	01:31:36
4	A.	I couldn't say with a hundred percent	01:31:41
5		certainty. I -- I believe he was 17 or 18, maybe.	01:31:45
6		I'm not sure actually.	01:31:51
7	Q.	How old -- how old was Amber when he	01:31:54
8		passed away?	01:31:55
9	MS. BREDEHOFT:	Objection to the form of	01:31:57
10		the question.	01:31:57
11		Go ahead.	01:31:58
12	A.	I don't know.	01:32:01
13	Q.	Did you ever observe Amber and Logan	01:32:02
14		fighting?	01:32:04
15	MS. BREDEHOFT:	Objection to the form of	01:32:08
16		the question.	01:32:09
17		Go ahead.	01:32:10
18	A.	No.	01:32:10
19	Q.	Did Amber ever tell you that she was	01:32:11
20		with Logan at the time he passed away?	01:32:19
21	MS. BREDEHOFT:	Objection to the form of	01:32:23
22		the question.	01:32:23

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

73

1	Go ahead.	01:32:25
2	A. That was not my understanding.	01:32:25
3	Q. And is it your understanding that Logan	01:32:32
4	passed away in a car accident?	01:32:34
5	MS. BREDEHOFT: Objection to the form of	01:32:37
6	the question.	01:32:39
7	Go ahead.	01:32:40
8	A. Yes.	01:32:41
9	Q. Did Amber ever tell you, in words or	01:32:43
10	substance, that she was driving the car at the	01:32:46
11	time he died?	01:32:48
12	MS. BREDEHOFT: Objection to the form of	01:32:49
13	the question.	01:32:50
14	Go ahead.	01:32:51
15	A. No.	01:32:52
16	Q. Was Amber with Logan when he passed	01:32:54
17	away?	01:32:56
18	MS. BREDEHOFT: Objection to the form of	01:32:57
19	the question, asked and answered.	01:32:58
20	Go ahead.	01:33:00
21	A. No.	01:33:01
22	Q. How did Amber react when Logan passed	01:33:02

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

74

1	away?	01:33:05
2	MS. BREDEHOFT: Objection to the form of	01:33:06
3	the question.	01:33:07
4	Go ahead.	01:33:08
5	A. She was devastated. He was her best	01:33:09
6	friend.	01:33:15
7	Q. Did Amber drop out of school after he	01:33:17
8	passed away?	01:33:19
9	MS. BREDEHOFT: Objection to the form of	01:33:20
10	the question.	01:33:21
11	Go ahead.	01:33:22
12	A. It was at some point after Logan passed,	01:33:24
13	but it wasn't as a result of that, no.	01:33:28
14	Q. Was your sister Amber's driver's license	01:33:31
15	suspended after Logan passed away?	01:33:34
16	MS. BREDEHOFT: Objection to the form of	01:33:37
17	the question, calls for hearsay.	01:33:38
18	Go ahead.	01:33:42
19	A. I believe -- I believe it was before.	01:33:43
20	I -- I can't recall with certainty, but I believe	01:33:46
21	it was before.	01:33:49
22	Q. So just to be clear, it's your	01:33:51

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

75

1	understanding that there came a time when Amber's	01:33:53
2	driver's license was suspended; true?	01:33:57
3	MS. BREDEHOFT: I'm going to object to	01:34:00
4	the form of the question and calls for	01:34:01
5	hearsay, speculation.	01:34:04
6	Go ahead.	01:34:06
7	A. If memory serves, I think at one point	01:34:06
8	it was.	01:34:12
9	Q. Do you know why it was suspended?	01:34:14
10	MS. BREDEHOFT: Objection to the form of	01:34:16
11	the question.	01:34:17
12	Go ahead.	01:34:18
13	A. I do not.	01:34:19
14	Q. You don't know, one way or the other,	01:34:22
15	whether it had anything to do with the accident in	01:34:24
16	which Logan died; is that true?	01:34:27
17	MS. BREDEHOFT: Objection to the form of	01:34:29
18	the question, asked and answered.	01:34:30
19	Go ahead.	01:34:32
20	A. It was -- it had nothing to do with	01:34:34
21	that.	01:34:36
22	Q. Did Amber ever drive the car -- strike	01:34:37

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

76

1	that.	01:34:41
2	Did Amber ever drive a car during the	01:34:42
3	period of time when her driver's license was	01:34:46
4	suspended?	01:34:48
5	MS. BREDEHOFT: Objection to the form of	01:34:50
6	the question, calls for speculation,	01:34:51
7	hypothetical.	01:34:53
8	Go ahead.	01:34:54
9	A. Yes.	01:34:55
10	After receiving my driver's license, I	01:35:00
11	had been in an accident. And she -- it was -- it	01:35:02
12	was very close to our house. And she was the only	01:35:09
13	one that was able to come. And it was my first	01:35:12
14	accident, and I was very shaken up and scared.	01:35:15
15	And she came to drive us back to our house.	01:35:18
16	Q. And at the time she did that, your	01:35:23
17	understanding was that her driver's license had	01:35:25
18	been suspended; is that correct?	01:35:29
19	MS. BREDEHOFT: Objection to the form of	01:35:30
20	the question.	01:35:31
21	Go ahead.	01:35:32
22	A. I might have known about it at the time.	01:35:34

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

77

1	I can't recall if I knew about it for sure.	01:35:36
2	I was -- like I said, it was my first	01:35:39
3	accident. I was -- I was so shaken up. I don't	01:35:42
4	know if I was thinking clearly.	01:35:45
5	Q. Did she ever get her driving privileges	01:35:47
6	restored?	01:35:50
7	MS. BREDEHOFT: Objection to the form of	01:35:51
8	the question.	01:35:52
9	Go ahead.	01:35:54
10	A. Yes.	01:35:54
11	Q. Okay. Let's -- let's move to a	01:35:56
12	different subject.	01:35:58
13	When did Amber move out of your parent's	01:35:59
14	home?	01:36:02
15	A. What year or --	01:36:02
16	Q. Well, how old was she? What year was	01:36:06
17	it?	01:36:09
18	MS. BREDEHOFT: Same objection.	01:36:12
19	A. I want to say she was 17, maybe younger.	01:36:13
20	I don't know.	01:36:20
21	Q. And you were still living with your	01:36:23
22	parents when Amber moved out at approximately 17;	01:36:24

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

78

1	correct?	01:36:28
2	A. Yes.	01:36:28
3	MS. BREDEHOFT: Objection to the form of	01:36:29
4	the question.	01:36:29
5	Q. Do you know why Amber moved out at that	01:36:30
6	time?	01:36:32
7	MS. BREDEHOFT: Objection to the form of	01:36:33
8	the question, calls for hypothetical,	01:36:34
9	speculation.	01:36:38
10	Go ahead.	01:36:39
11	And hearsay.	01:36:40
12	A. I don't re- -- I don't know. You would	01:36:48
13	have to ask her if there was a specific reason.	01:36:50
14	Q. Where did she go live after she moved	01:36:53
15	out at age 17?	01:36:55
16	MS. BREDEHOFT: Objection to the form of	01:36:56
17	the question.	01:36:57
18	Go ahead.	01:36:59
19	A. I -- I know what city. She came out	01:36:59
20	here to Los Angeles, but I don't know where	01:37:02
21	specifically.	01:37:04
22	Q. When she first came to Los Angeles after	01:37:05

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

79

1	leaving your parents' house, did she go live with	01:37:07
2	someone or did she live alone?	01:37:12
3	MS. BREDEHOFT: Objection to the form of	01:37:14
4	the question.	01:37:15
5	Go ahead.	01:37:16
6	A. I -- I honestly can't recall if she	01:37:16
7	had -- I can't recall.	01:37:22
8	Q. Do you know whether she lived with a	01:37:26
9	boyfriend?	01:37:28
10	A. No.	01:37:29
11	MS. BREDEHOFT: Object to the form of	01:37:30
12	the question.	01:37:32
13	Go ahead.	01:37:33
14	Q. How did Amber support herself when she	01:37:33
15	went out to live in Los Angeles at age 17?	01:37:36
16	MS. BREDEHOFT: Objection to the form of	01:37:40
17	the question, calls for hypothetical,	01:37:41
18	speculation and hearsay.	01:37:43
19	Go ahead.	01:37:45
20	A. I don't know. I wasn't out here. I	01:37:48
21	didn't speak to her every day. I'm not sure	01:37:51
22	specifically how.	01:37:54

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

80

1	Q.	Did your sister Amber ever live in New	01:37:56
2		York?	01:37:58
3	MS. BREDEHOFT:	Objection to the form of	01:38:00
4		the question.	01:38:01
5		Go ahead.	01:38:03
6	A.	I don't know.	01:38:03
7	Q.	You don't know, one way or the other?	01:38:07
8	MS. BREDEHOFT:	Same -- same objection.	01:38:11
9	A.	I don't -- I don't believe so. I know	01:38:15
10		she -- I know she had gone out there, but I don't	01:38:17
11		think she lived there for a significant period of	01:38:19
12		time.	01:38:22
R 13	Q.	When did you move out of your parents'	01:38:23
14		house in Texas?	01:38:26
15	A.	After graduating high school in 2006.	01:38:30
16	Q.	Why did you move out at that time?	01:38:36
17	MS. BREDEHOFT:	Objection to the form of	01:38:39
18		the question.	01:38:40
19		Go ahead.	01:38:41
20	A.	To get out of Austin. I was attending	01:38:43
21		school out here. Just sounded great. I just	01:38:48
22		wanted to be here.	01:38:54

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

81

R	1	Q. And where did you go to live after you	01:38:55
	2	moved out of your parents' house?	01:38:57
	3	MS. BREDEHOFT: Objection to the form of	01:38:59
	4	the question.	01:39:00
	5	Go ahead.	01:39:01
	6	A. Amber and I lived together here in	01:39:02
	7	Los Angeles. We had an apartment that we shared	01:39:07
	8	with one other person.	01:39:10
	9	Q. And where was that in Los Angeles?	01:39:11
	10	A. Hancock Park.	01:39:15
	11	Q. Who was the third person with whom you	01:39:17
	12	and Amber lived?	01:39:19
	13	A. Her name was Lisa.	01:39:20
	14	Q. How old were you when you went to	01:39:25
	15	Los Angeles to live with your sister Amber and	01:39:27
	16	Lisa?	01:39:30
	17	A. 17 or 18.	01:39:31
	18	Q. How did you support yourself while the	01:39:39
	19	three of you were living together? How did you	01:39:42
	20	support yourself?	01:39:45
	21	MS. BREDEHOFT: Objection to the form of	01:39:46
	22	the question.	01:39:46

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

82

1	Go ahead.	01:39:47
R		
2	A. My maternal grandparents had -- before	01:39:48
3	they passed, they set up an educational trust	01:39:54
4	fund; that as long as I was in school, I received	01:39:59
5	a really small allowance so that I wouldn't have	01:40:02
6	to work.	01:40:05
7	I eventually did start working various,	01:40:06
8	like, retail jobs. Embarrassingly, at Abercrombie	01:40:08
9	& Fitch at one point. And then when I turned --	01:40:16
10	like by the time I was 21, I was able to get a job	01:40:20
11	at a hotel. But -- yeah. Other than that, just	01:40:23
12	minimal jobs here and there.	01:40:27
13	Q. Do you remember Lisa's last name?	01:40:29
14	MS. BREDEHOFT: Object to the form of	01:40:37
15	the question.	01:40:37
16	Go ahead.	01:40:38
17	A. I'm so sorry because I should know that,	01:40:39
18	but I can't recall it at this moment.	01:40:41
19	Q. Did you ever -- did there come a time	01:40:44
20	when you ever returned to living with your	01:40:47
21	parents?	01:40:48
22	MS. BREDEHOFT: Objection to the form of	01:40:57

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

83

1	the question.	01:40:58
2	Go ahead.	01:40:59
3	A. Not as a permanent resident. But,	01:40:59
4	again, because I was attending -- I'm so sorry. I	01:41:01
5	do occasionally have to stand up. Sorry if this	01:41:05
6	is disrupting, but I do -- I just have to stand up	01:41:08
7	really quickly. Sorry.	01:41:11
8	Q. No. No.	01:41:13
9	Would you like to take a quick break?	01:41:13
10	It's no problem at all.	01:41:15
11	A. Oh, no, no, no. I'm okay. I just need	01:41:17
12	to -- I just need to get up and stretch my legs	01:41:19
13	and back real quick, but that's -- I'm much better	01:41:22
14	now. I'm already better. Okay. Apologies.	01:41:25
15	What was the question? I'm sorry.	01:41:31
16	MR. CHEW: Actually, if the reporter can	01:41:34
17	kindly read it back.	01:41:36
18	THE COURT REPORTER: Yes, sir. Just a	01:42:06
19	moment.	01:42:07
20	(Record read by stenographer.)	01:42:08
21	THE WITNESS: I remember. Thank you.	01:42:09
22	A. I was in school. I studied -- for the	01:42:11

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

84

1	first few years I was out there, so for academic	01:42:13
2	breaks, like summer break, winter break, I would	01:42:17
3	occasionally go back to visit, but I never moved	01:42:20
4	back in once I moved out.	01:42:23
5	Q. Now I want to broaden the lens a little	01:42:25
6	bit to a wide-open time frame.	01:42:28
7	I take it there -- there have been times	01:42:33
8	when you and Amber have had arguments.	01:42:35
9	MS. BREDEHOFT: Objection to the form of	01:42:40
10	the question.	01:42:41
11	Go ahead.	01:42:42
12	A. Yes.	01:42:43
13	Q. And, for example, when you were first	01:42:45
14	living with her in Los Angeles, how often would	01:42:47
15	you all get into arguments?	01:42:51
16	MS. BREDEHOFT: Objection to the form of	01:42:53
17	the question.	01:42:54
18	Go ahead.	01:43:05
19	A. I couldn't recall how many times, but	01:43:05
20	we're sisters. As I mentioned before, we're super	01:43:07
21	close. It's very common for sisters to argue. I	01:43:10
22	wouldn't be able to tell you how many times.	01:43:13

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

85

1 Q. And, again, this is another broad 01:43:15
2 question, but I'll ask it anyway. What types of 01:43:16
3 things would you argue with her about? 01:43:19

4 MS. BREDEHOFT: Objection to the form of 01:43:21
5 the question. 01:43:22

6 Go ahead. 01:43:23

7 A. Silly things, in retrospect, like who 01:43:23
8 borrowed whose jacket or -- I -- I can't remember 01:43:32
9 arguing about anything significant when we were -- 01:43:35
10 especially when we were first living together. 01:43:39

11 Q. And now, you know, broadening it beyond 01:43:42
12 just the time when you were living together when 01:43:44

R, 13 you were very young. In any arguments you've had 01:43:46
ICE, 14 with Amber over the entire period of your lives, 01:43:50
ICD 15 has she ever been physically violent with you -- 01:43:54

16 MS. BREDEHOFT: Objection to the form -- 01:43:59

R, 17 Q. -- ever hit you in any way or thrown 01:44:00
ICE, something at you? 01:44:02
ICD18

19 MS. BREDEHOFT: Objection to the form of 01:44:03
20 the question. 01:44:04

21 Go ahead. 01:44:05

R, 22 A. No. 01:44:07
ICE,
ICD

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

86

R, ICE, ICD, AA	1	Q. She's never hit you?	01:44:08
	2	A. No.	01:44:12
	3	Q. She's never slapped you?	01:44:13
	4	A. No.	01:44:16
	5	Q. She's never thrown anything at you?	01:44:16
	6	A. No.	01:44:19
	7	Q. Have you and your sister Amber not	01:44:20
	8	spoken for a period of time because you had had a	01:44:24
	9	fight or disagreement?	01:44:27
	10	MS. BREDEHOFT: Objection to the form of	01:44:30
	11	the question.	01:44:32
	12	Go ahead.	01:44:33
	13	A. Yes. There were periods of time where	01:44:33
	14	we weren't on speaking terms or we weren't as	01:44:35
	15	close to one another as we might have been	01:44:38
	16	previously due to an argument or disagreement.	01:44:40
	17	Q. How many times can you remember where	01:44:44
	18	there was a hiatus, you know, of communications	01:44:47
	19	between the two of you?	01:44:49
	20	MS. BREDEHOFT: Objection to the form of	01:44:51
	21	the question.	01:44:52
	22	Go ahead.	01:44:53

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

87

1	A. I -- I wouldn't be able to recall	01:44:55
2	specifically how many times.	01:44:57
3	Q. Putting aside the number of times it's	01:44:59
4	happened, do you remember the duration of those	01:45:02
5	periods of time? You know, how long it was	01:45:05
6	between communications between the two sisters?	01:45:10
7	MS. BREDEHOFT: Objection to the form of	01:45:12
8	the question.	01:45:13
9	Go ahead.	01:45:14
10	A. Different times for different	01:45:17
11	situations.	01:45:18
12	Generally, very short. I'd say the	01:45:20
13	periods of time that were extensive or significant	01:45:24
14	were fewer.	01:45:27
15	Probably more commonplace would just be	01:45:31
16	a few days of not speaking to her.	01:45:32
17	Q. Do -- do you recall -- and when you did	01:45:37
18	renew communications, was it one or the other of	01:45:39
19	you who would try to make peace?	01:45:42
20	MS. BREDEHOFT: Objection to the form of	01:45:46
21	the question.	01:45:47
22	Go ahead.	01:45:49

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

88

1	A.	That was really very largely dependent	01:45:50
2		on the situation, whatever the argument might have	01:45:53
3		been about initially.	01:45:58
4	I --	I would say it was probably a fair	01:46:00
5		number of times on both parts, where it was either	01:46:03
6		reconciling on my part or reconciling on her part.	01:46:06
7	But, again,	it was mostly dependent on the	01:46:10
8		situation.	01:46:12
9	Q.	And I was wondering, was -- do you	01:46:13
10		recall a period of time in 2015 when you and Amber	01:46:15
11		were estranged and not communicating?	01:46:22
12	MS. BREDEHOFT:	Objection to the form of	01:46:26
13		the question.	01:46:27
14		Go ahead.	01:46:28
15	A.	Yes.	01:46:29
16	Q.	And when did that happen?	01:46:32
17	MS. BREDEHOFT:	Same objection.	01:46:34
18		Go ahead.	01:46:36
19	A.	Hard to say when it started. There was	01:46:38
20		not a certain date, it started on March blah,	01:46:41
21		blah, blah, blah, blah, blah. It wasn't specific.	01:46:45
22	I --	I wish I could narrow it down for	01:46:50

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

89

1	you, but I -- I can't recall specifically when it	01:46:52
2	started.	01:46:55
3	Q. Well, putting aside when it started, how	01:46:56
4	long did the impasse last? How long were you not	01:46:58
5	speaking?	01:47:03
6	MS. BREDEHOFT: Objection to the form of	01:47:04
7	the question.	01:47:04
8	Go ahead.	01:47:05
9	A. To the best of my recollection, a couple	01:47:06
10	of months, maybe.	01:47:11
11	Q. So what caused the impasse?	01:47:13
12	MS. BREDEHOFT: Objection to the form of	01:47:16
13	the question.	01:47:17
14	Go ahead.	01:47:18
15	A. It was a combination of things, but one	01:47:19
16	of the -- one of the reasons that got, I guess,	01:47:26
17	held on to or one of the reasons that was	01:47:31
18	stated -- cited was that I was -- they accused me	01:47:34
19	of leaking information to the media, selling	01:47:39
20	information, which was absolutely untrue.	01:47:41
21	And seeing everything in hindsight now,	01:47:47
22	it absolutely was not -- it was just another	01:47:48

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

90

1	tactic to separate Amber. There was no truth to	01:47:52
2	it. There was no validity to it. It was	01:47:55
3	something that was used just to separate Amber	01:47:57
4	and I.	01:48:00
5	Q. Okay. Let's -- let's unpack that, if we	01:48:01
6	can.	01:48:05
7	When you said that they accused you of	01:48:06
8	leaking to the media, what do you mean by the	01:48:10
9	pronoun "they"? Who are "they"?	01:48:14
10	A. Amber and Johnny had believed that I was	01:48:16
11	doing that.	01:48:23
12	Q. What did they believe you were leaking	01:48:25
13	to the media?	01:48:27
14	MS. BREDEHOFT: Objection to the form of	01:48:29
15	the question, calls for speculation,	01:48:31
16	hypothetical.	01:48:34
17	Go ahead.	01:48:35
18	A. They just were accusing me of leaking	01:48:37
19	stories to the media about their wedding or	01:48:39
20	various things that -- that came out in the press.	01:48:44
21	But again, I vehemently deny that. I never did	01:48:48
22	anything of the sort.	01:48:54

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

91

1	Q. When you say that "they accused you,"	01:48:55
2	was it John- -- Johnny, your brother-in-law, or	01:48:57
3	was it your sister Amber who made that accusation	01:49:00
4	that you were leaking these things to the media?	01:49:04
5	MS. BREDEHOFT: Objection to the form of	01:49:07
6	the question, calls for speculation and	01:49:07
7	hypothetical.	01:49:10
8	Go ahead.	01:49:11
9	A. It was Johnny initially, and he had	01:49:14
10	convinced Amber.	01:49:16
11	Q. Okay. How do -- how did Johnny express	01:49:17
12	to you that he thought you were leaking to the	01:49:21
13	media?	01:49:23
14	A. It was never made completely clear to me	01:49:24
15	how that conclusion was drawn, only that, in	01:49:29
16	digging and in investigating -- I don't know if	01:49:34
17	that was meant to imply that he had hired	01:49:38
18	investigators or what. I actually don't know.	01:49:41
19	But he claimed that he had had it investigated and	01:49:44
20	all of these leaks somehow traced back to me and	01:49:48
21	my friend Sara Kitnick.	01:49:50
22	Q. Did he tell you that directly?	01:49:53

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

92

1	Did he say to you, in words or	01:49:55
2	substance, "Whitney, I think you leaked to the	01:49:57
3	media"?	01:50:01
4	A. Yes, we did talk about it at one point.	01:50:03
5	We were on the couch at one of the	01:50:07
6	penthouses. And he also postured it as like	01:50:10
7	giving me -- giving it the possibility that I just	01:50:17
8	happened to say the wrong thing to the wrong	01:50:19
9	person and it spun out. But he, himself, did	01:50:21
10	absolutely have a conversation with me about it.	01:50:27
11	Q. And when you say "the penthouses," are	01:50:29
12	you referring to the penthouses at the Eastern	01:50:30
13	Columbia Building?	01:50:33
14	A. Yes, sir.	01:50:35
15	Q. And because we're going to be talking	01:50:35
16	about that later, just so we can get through this	01:50:36
17	quickly and get you back to other things, so if I	01:50:42
18	say the "ECB penthouses," we both know what we're	01:50:46
19	talking about?	01:50:49
20	Is that okay?	01:50:50
21	A. Yes, sir.	01:50:51
22	Q. So when -- when Johnny was sitting on	01:50:51

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

93

1	the sofa with you kind of raising this issue with	01:50:53
2	you, was your sister Amber in the room as well or	01:50:56
3	was it just you and Johnny?	01:50:59
4	MS. BREDEHOFT: Objection to the form of	01:51:00
5	the question.	01:51:01
6	Go ahead.	01:51:02
7	A. It was primarily just Johnny and I. But	01:51:02
8	again, the layout of penthouse 3, specifically,	01:51:08
9	was -- was very open. So if somebody were in the	01:51:11
10	kitchen, they could pretty easily hear the	01:51:14
11	conversation that was happening in the sofa in the	01:51:19
12	living room versus if you were on the mezzanine	01:51:22
13	level of PH 3 -- yeah, PH 3, or even on the upper.	01:51:24
14	But it was a pretty open space.	01:51:30
15	So, periodically, Amber would come in	01:51:31
16	and out of the kitchen. But the conversation was	01:51:33
17	mostly just Johnny and I.	01:51:36
18	Q. Did Amber -- so is it fair to say that	01:51:38
19	Amber was within earshot of your conversation with	01:51:42
20	Johnny about the leaks?	01:51:46
21	MS. BREDEHOFT: Object. Objection to	01:51:48
22	the form of the question, calls for	01:51:48

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

94

1	speculation, hypothetical.	01:51:50
2	Go ahead.	01:51:52
3	A. She might have been. But again, I -- I	01:51:53
4	don't -- she -- my memory of that conversation,	01:51:56
5	she was not present.	01:51:59
6	Q. Did -- did she participate in any way?	01:52:00
7	Did she -- she come in at any point in	01:52:03
8	the jurisdiction and -- and weigh in or make any	01:52:06
9	kind of comment?	01:52:08
10	MS. BREDEHOFT: Objection to the form of	01:52:09
11	the question.	01:52:10
12	Go ahead.	01:52:11
13	A. No.	01:52:14
14	Q. How do you know that your sister Amber	01:52:16
15	came to the same belief that Mr. Depp had?	01:52:20
16	MS. BREDEHOFT: Objection to the form of	01:52:23
17	the question, calls for speculation,	01:52:24
18	hypothetical, hearsay.	01:52:26
19	Go ahead.	01:52:28
20	A. Her and I spoke separately about it.	01:52:29
21	Q. And -- and when did that conversation	01:52:32
22	take place in relation to your conversation with	01:52:33

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

95

1	Johnny in penthouse 3?	01:52:38
2	MS. BREDEHOFT: Objection to the form of	01:52:40
3	the question.	01:52:41
4	Go ahead.	01:52:42
5	A. At some point prior to my conversation	01:52:45
6	with Johnny, I spoke to Amber about it first and	01:52:46
7	then had a conversation with Johnny after at some	01:52:51
8	point.	01:52:53
9	Q. So what did -- what did Ms. -- what did	01:52:54
10	Amber say to you in the conversation?	01:52:57
11	MS. BREDEHOFT: Objection to the form of	01:53:01
12	the question.	01:53:03
13	Go ahead.	01:53:04
14	A. To the best of my recollection, she	01:53:04
15	had -- she had said that, you know, Johnny --	01:53:09
16	Johnny's team had had these leaks investigated.	01:53:14
17	She didn't say by whom. She didn't say over what	01:53:18
18	period of time. And she said basically, "Whit, it	01:53:21
19	all comes back to you. Either you're selling	01:53:26
20	these stories or you're just telling the wrong	01:53:28
21	person, but Johnny and I are very hurt."	01:53:31
22	As has been stated many a time, privacy	01:53:34

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

96

1	was of the utmost importance to them. So	01:53:37
2	absolutely an accusation like that, for them, was	01:53:42
3	huge.	01:53:45
4	But again, it was -- it was -- she had	01:53:49
5	brought it up to me in terms of, you know, Johnny	01:53:51
6	had had this issue investigated.	01:53:54
7	Q. How did you respond when your sister	01:53:56
8	said that she and Johnny believed that you had	01:53:58
9	done this based on the research done by his team?	01:54:01
10	MS. BREDEHOFT: Objection to the form of	01:54:05
11	the question.	01:54:06
12	Go ahead.	01:54:07
13	A. I was completely flabbergasted. I	01:54:07
14	didn't -- I knew it wasn't true. I knew I hadn't.	01:54:13
15	I knew I hadn't sold anything. I knew I hadn't	01:54:16
16	maliciously told anybody anything.	01:54:19
17	I think that's part of the reason why	01:54:23
18	they, you know, hinged it a lot on my friend that	01:54:26
19	they ended up citing as the source. Because it	01:54:28
20	was also really implied that it could have been me	01:54:33
21	just telling the wrong person the wrong thing, but	01:54:38
22	I -- but I was very shocked.	01:54:41

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

97

1	Q. How did the impasse end?	01:54:42
2	MS. BREDEHOFT: Objection to the form of	01:54:45
3	the question.	01:54:45
4	Go ahead.	01:54:47
5	A. By "impasse," you mean -- you mean how	01:54:48
6	did that conversation end or how did --	01:54:51
7	Q. No. It's a bad question. I'll withdraw	01:54:53
8	the question.	01:54:55
9	So you were -- so you were very hurt by	01:54:56
10	this accusation, I take it?	01:54:59
11	MS. BREDEHOFT: Objection to the form of	01:55:01
12	the question.	01:55:02
13	A. Of course.	01:55:03
14	MS. BREDEHOFT: Go ahead.	01:55:04
15	A. Of course.	01:55:04
16	Q. And so you and your sister didn't speak	01:55:05
17	for, and correct me if I'm wrong, you said about	01:55:07
18	two months; is that correct?	01:55:11
19	MS. BREDEHOFT: Objection to the form of	01:55:13
20	the question.	01:55:13
21	Go ahead.	01:55:14
22	A. I don't believe I said two months. I --	01:55:15

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

98

1	I -- it was a number of months, but I don't know	01:55:18
2	if it was two. I couldn't tell you with any	01:55:21
3	certainty if it was two or four or five. But it	01:55:24
4	was a period of time.	01:55:26
5	Q. So -- so there were a period of months	01:55:29
6	in which you had no communications with your	01:55:31
7	sister Amber; correct?	01:55:33
8	MS. BREDEHOFT: Objection to the form of	01:55:34
9	the question.	01:55:35
10	Go ahead.	01:55:36
11	A. Little to no.	01:55:40
12	Q. How did you resume normal	01:55:43
13	communications, if you did?	01:55:45
14	MS. BREDEHOFT: Objection to the form of	01:55:47
15	the question.	01:55:48
16	Go ahead.	01:55:49
17	A. I had -- I had growing concerns about	01:55:50
18	what was happening. I had a lot of anxiety	01:56:01
19	surrounding not being near her, not being a	01:56:04
20	support for her, not being in her life.	01:56:07
21	I eventually reached out to her to see	01:56:10
22	if we could reconcile and have, you know, a	01:56:14

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

99

1	conversation to kind of clear the air. But it was	01:56:18
2	a -- it was a mutual desire to do so.	01:56:21
3	Q. So -- but -- but in point of fact, you	01:56:24
4	were the one who -- who reached out to her; is	01:56:26
5	that fair to say?	01:56:29
6	MS. BREDEHOFT: Objection to the form of	01:56:31
7	the question.	01:56:31
8	Go ahead.	01:56:32
9	A. It was very mutual, but I -- I do	01:56:34
10	remember reaching out to her at one point or	01:56:36
11	another.	01:56:40
12	Q. And -- and at some point, she -- she,	01:56:41
13	you know, grasped the extended hand; in other	01:56:43
14	words, she agreed to start communicating with you	01:56:47
15	again; is that -- is that what happened?	01:56:49
16	MS. BREDEHOFT: Objection to the form of	01:56:51
17	the question.	01:56:52
18	Go ahead.	01:56:53
19	A. Yes.	01:56:56
20	MR. CHEW: Why don't we take -- if you	01:56:58
21	don't mind -- I'm about to show you a series	01:56:59
22	of documents, so it might be a good time to	01:57:02

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

100

1	break for ten minutes, if that -- if that	01:57:05
2	works for you. And then we'll try to -- try	01:57:07
3	to go through these documents quickly, but it	01:57:10
4	might be a natural place to -- to break and	01:57:13
5	stretch -- stretch the legs for ten minutes.	01:57:16
6	THE WITNESS: Okay.	01:57:19
7	MR. CHEW: Okay. Thank you.	01:57:20
8	THE VIDEOGRAPHER: Off the record at	01:57:22
9	1:57.	01:57:23
10	(Recess in proceedings.)	02:10:55
11	THE VIDEOGRAPHER: We are back on the	02:10:59
12	record at 2:10.	02:11:00
13	BY MR. CHEW:	02:11:02
14	Q. Ms. Henriquez, before we go through the	02:11:02
15	documents quickly, I just wanted to ask a	02:11:04
16	follow-up question about Logan.	02:11:07
17	What is Logan's last name?	02:11:08
18	MS. BREDEHOFT: Objection to the form of	02:11:13
19	the question.	02:11:14
20	Go ahead.	02:11:15
21	A. I'm sorry, I don't recall his surname.	02:11:17
22	Q. All right.	02:11:21

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

101

1	MR. CHEW: Let's -- please show the	02:11:21
2	witness Exhibit 1.	02:11:23
3	REMOTE TECHNICIAN: Stand by.	02:11:27
4	MR. CHEW: From Ms. Henriquez's own	02:11:29
5	production, Bates Number WH63.	02:11:31
6	(Exhibit 1 was marked for identification	02:11:40
7	and is attached to the transcript.)	02:11:40
8	REMOTE TECHNICIAN: Exhibit 1 is on the	02:11:42
9	screen.	02:11:43
10	BY MR. CHEW:	02:11:44
11	Q. Ms. Henriquez, do you recognize this	02:11:44
12	document?	02:11:46
13	MS. BREDEHOFT: Take a minute and review	02:11:48
14	it. Make sure you're familiar with it.	02:11:50
15	A. I'm sorry. Do I have the ability to	02:11:52
16	make it larger? I have a -- it's very small. I	02:11:54
17	have trouble seeing it.	02:11:56
18	REMOTE TECHNICIAN: I'll pass you remote	02:11:58
19	control or I can zoom in for you, if you	02:12:00
20	want.	02:12:03
21	THE WITNESS: Oh, okay. Thank you.	02:12:06
22	A. Let me see.	02:12:08

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

102

1	Q. These are texts between you and Mr. Depp	02:12:13
2	that you produced to us in discovery; correct?	02:12:16
3	A. Yes.	02:12:18
4	MS. BREDEHOFT: Object to the form of	02:12:19
5	the question.	02:12:19
6	And take your time and make sure you	02:12:20
7	have reviewed it before you answer.	02:12:21
8	Q. This isn't that complicated.	02:12:26
9	Is the phone number next to Whit Heard	02:12:28
10	the phone number you had in February of 2014?	02:12:31
11	MS. BREDEHOFT: Obj- -- wait -- just	02:12:37
12	wait for a second. I'm going to object to	02:12:38
13	you interrupting me.	02:12:41
14	And, Whitney, have you finished reading	02:12:42
15	this?	02:12:45
16	THE WITNESS: Not yet. Let me just read	02:12:45
17	this.	02:12:45
18	MS. BREDEHOFT: Okay. Take your time.	02:12:47
19	MR. CHEW: Elaine, you know, you have	02:12:49
20	been making speaking objections and stalling.	02:12:50
21	And we don't want to have to bring your	02:12:53
22	client back, but we're going to, because this	02:12:55

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

103

1	is an important witness. You know it, I know	02:12:57
2	it, the judge knows it. We're not going to	02:12:59
3	have anymore stalling.	02:13:01
4	MS. BREDEHOFT: Are you finished?	02:13:02
5	BY MR. CHEW:	02:13:03
6	Q. Ms. Henriquez, is the phone number next	02:13:06
7	to Whit Heard the phone number you had in February	02:13:09
8	of 2014?	02:13:11
9	A. Yes.	02:13:12
10	Q. Do you see where it says "Mr. Hop" next	02:13:14
11	to recipients?	02:13:17
12	MS. BREDEHOFT: Objection to the form of	02:13:20
13	the question.	02:13:21
14	Go ahead.	02:13:22
15	A. Yes, I do see that.	02:13:23
16	Q. Who is Mr. Hop?	02:13:25
17	A. That's Johnny.	02:13:26
18	Q. Why do you call Johnny Mr. Hop?	02:13:27
19	A. Just one of many silly nicknames that I	02:13:31
20	had for him.	02:13:34
21	Q. And you also called him Hammer; correct?	02:13:36
22	A. Correct.	02:13:38

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

104

1	Hammer, Hammerhead. Various nicknames.	02:13:41
2	Q. Why did you call him Hammer or	02:13:45
3	Hammerhead?	02:13:47
4	A. There was -- it's a kind of long,	02:13:48
5	not-so-clear story, but there was a really funny	02:13:55
6	viral video that was going around kind of around	02:14:00
7	the time that Amber and Johnny started dating, and	02:14:05
8	there's a funny line in there where the -- the	02:14:10
9	little cartoon lizard that says, "I'm Johnny	02:14:12
10	Hammerhead. Mr. Hammer sticks."	02:14:17
11	And whatever, it just kind of became a	02:14:20
12	joke that I called him Hammerhead as a result of	02:14:23
13	that silly video.	02:14:25
14	Q. Fair to say that that was an	02:14:27
15	affectionate nickname; correct?	02:14:28
16	A. Correct.	02:14:30
17	Q. Do you see the text message that -- that	02:14:31
18	reads, quote "Last time Sis and I got into it, you	02:14:34
19	convinced me to go and face Amber and the issues	02:14:38
20	at hand when all I wanted to do was run away."	02:14:41
21	Do you see that?	02:14:45
22	MS. BREDEHOFT: Object to the form of	02:14:49

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

105

1	the question.	02:14:48
2	But go ahead.	02:14:49
3	Q. It's right in the middle of your	02:14:55
4	response to him.	02:14:56
5	A. "Last time Sis" -- yeah, I see it.	02:14:58
6	"Last time Sis and I got into it, you	02:15:00
7	convinced me to go face her and the issues at hand	02:15:03
8	when all I wanted to do is run away."	02:15:06
9	Yes, I see it.	02:15:08
10	Q. And this is a text message that you sent	02:15:10
11	to Mr. Depp; correct?	02:15:11
12	A. Correct.	02:15:13
13	Q. And when you refer to "Sis," you were	02:15:14
14	referring to your sister Amber; true?	02:15:16
15	A. That is true.	02:15:19
16	Q. What do you mean here that you and Amber	02:15:20
17	"got into it"?	02:15:21
18	A. I can't recall specifically. I'm	02:15:23
19	assuming it is in reference to an argument we	02:15:29
20	might have had or a squabble.	02:15:32
21	Q. And that's a squabble between you and	02:15:35
22	Amber; true?	02:15:37

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

106

1	A. As I recall --	02:15:39
2	MS. BREDEHOFT: Object to the form of	02:15:40
3	the question.	02:15:41
4	Go ahead.	02:15:42
5	A. Correct. That's what I would take this	02:15:42
6	to mean.	02:15:44
7	Q. Okay.	02:15:45
8	MR. CHEW: Let's move to Exhibit 2,	02:15:46
9	please.	02:15:47
10	REMOTE TECHNICIAN: Stand by.	02:15:49
11	(Exhibit 2 was marked for identification	02:15:49
12	and is attached to the transcript.)	02:15:49
13	MR. CHEW: Which are also text messages	02:15:50
14	that you produced between you and Mr. Depp,	02:15:53
15	WH64 through 66.	02:15:58
16	REMOTE TECHNICIAN: Henriquez 2 on the	02:16:04
17	screen.	02:16:05
18	MR. CHEW: And I'm going to start her on	02:16:07
19	the second page.	02:16:09
20	MS. BREDEHOFT: Whitney, go ahead and	02:16:13
21	review it, though, before you answer any	02:16:14
22	questions.	02:16:17

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

107

1	THE WITNESS: Okay.	02:16:17
2	BY MR. CHEW:	02:16:17
3	Q. But I'd ask you -- I'd ask you to review	02:16:21
4	the second page because that's all I'm asking you	02:16:23
5	about.	02:16:26
6	A. I'm just having difficulty actually	02:16:26
7	making the print larger. I'm sorry.	02:16:28
8	Q. So why don't -- maybe the technician can	02:16:30
9	help you move it to the second page and then	02:16:32
10	enlarge -- enlarge the print because I'm just	02:16:35
11	asking you about one of your texts to him.	02:16:37
12	MS. BREDEHOFT: You can still read the	02:16:39
13	whole context of it before you answer his	02:16:41
14	questions. You're allowed.	02:16:43
15	MR. CHEW: I'm not asking her about the	02:16:45
16	whole thing. And you're stalling again,	02:16:46
17	Elaine. And it's not going to --	02:16:48
18	MS. BREDEHOFT: I'm not stalling. I'm	02:16:50
19	not stalling at all.	02:16:51
20	MR. CHEW: Yes, you are.	02:16:53
21	MS. BREDEHOFT: She has a right --	02:16:54
22	MR. CHEW: Yes, you are.	02:16:55

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

108

1	MS. BREDEHOFT: She has a right to	02:16:56
2	review what you put in front of her, and you	02:16:57
3	know that.	02:16:58
4	MR. CHEW: She does not have the right	02:16:59
5	for you to coach her unmercifully.	02:17:00
6	MS. BREDEHOFT: I'm not coaching, and	02:17:03
7	I -- and the record speaks for itself. She	02:17:04
8	has the right to review --	02:17:04
9	MR. CHEW: All right. Stop. Just stop.	02:17:04
10	MS. BREDEHOFT: -- the entire exhibit.	02:17:04
11	MR. CHEW: Stop. Please stop so that we	02:17:08
12	can get through this.	02:17:11
13	MS. BREDEHOFT: Mr. Chew, I'm going to	02:17:13
14	object to your being abusive to me.	02:17:14
15	MR. CHEW: I'm objecting -- I'm	02:17:16
16	objecting to your use of the abuse in a case	02:17:16
17	where your client has falsely alleged abuse.	02:17:18
18	MS. BREDEHOFT: I think the record	02:17:23
19	speaks for itself.	02:17:24
20	BY MR. CHEW:	02:17:25
21	Q. Ms. Henriquez, I'm directing your	02:17:26
22	attention to the document produced, second page of	02:17:28

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

109

1	Exhibit 2, WH065.	02:17:31
2	Do you see where it says, quote, "Look,	02:17:34
3	you know I have a pretty good understanding of	02:17:37
4	what it is you're going through right now.	02:17:39
5	Believe me, I've been there with her. Obviously	02:17:42
6	not in the same capacity, but I know what it's	02:17:44
7	like to want to run away for days to do my own	02:17:46
8	thing and having Amber there fighting with you,"	02:17:50
9	unquote.	02:17:53
10	Did I read that correctly?	02:17:55
11	MS. BREDEHOFT: Objection to the form of	02:17:56
12	the question.	02:17:57
13	Q. You've got it right there.	02:17:58
14	A. I just got to it, so forgive me. Okay.	02:18:00
15	It is...	02:18:05
16	Q. Did I read the first five lines of that	02:18:12
17	text correctly?	02:18:13
18	MS. BREDEHOFT: Objection to the form of	02:18:17
19	the question.	02:18:17
20	Go ahead.	02:18:18
21	A. Correct.	02:18:18
22	Q. And this is a text message you sent to	02:18:20

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

110

1	Mr. Depp; correct?	02:18:21
2	MS. BREDEHOFT: Objection to the form of	02:18:23
3	the question.	02:18:24
4	Go ahead.	02:18:25
5	A. Correct.	02:18:27
6	Q. What are you referring to here?	02:18:28
7	A. I would -- I would need to see the	02:18:30
8	context of the -- of the rest of the conversation	02:18:37
9	to get a better idea.	02:18:40
10	Q. What would you --	02:18:42
11	A. I just want to understand fully before I	02:18:42
12	answer.	02:18:44
13	Q. What did you mean when you said, "I've	02:18:48
14	been there with her"?	02:18:51
15	MS. BREDEHOFT: Objection to the form of	02:18:52
16	the question.	02:18:52
17	A. That I've been in arguments with Amber	02:18:57
18	before.	02:18:59
19	Q. And what do you mean when you said,	02:19:00
20	quote, "I know what it's like to want to run away	02:19:03
21	for days to do my own thing and having Amber there	02:19:07
22	fighting with you"?	02:19:09

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

111

1	MS. BREDEHOFT: Objection to the form of	02:19:11
2	the question.	02:19:12
3	Go ahead.	02:19:13
4	A. If you could -- if you could please	02:19:15
5	allow me to read the rest of the conversation. I	02:19:16
6	think would help give it context because I	02:19:19
7	don't -- I want to answer fully.	02:19:22
8	Okay.	02:20:20
9	Q. So my question was: What do you mean	02:20:20
10	when you said, quote, "I know what it's like to	02:20:22
11	want to run away for days to do my own thing and	02:20:25
12	having Amber there fighting with you," unquote?	02:20:29
13	MS. BREDEHOFT: Objection to the form of	02:20:33
14	the question.	02:20:33
15	Go ahead.	02:20:34
16	A. Meaning not want to deal with the	02:20:39
17	problem, not want to face the issue at hand. You	02:20:41
18	know, not physically run -- I mean, physically run	02:20:47
19	away, sure, but I think I was speaking more about	02:20:50
20	metaphorically wanting to not address the problem	02:20:53
21	right away because it's harder -- it's harder to	02:20:57
22	sit there and address the problem than it is to	02:21:00

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

112

1	run away and avoid it.	02:21:02
2	Q. Have you had to run away from a fight	02:21:04
3	with Amber in the past?	02:21:06
4	MS. BREDEHOFT: Objection to the form of	02:21:07
5	the question.	02:21:08
6	Go ahead.	02:21:12
7	A. I wouldn't say that I had to.	02:21:13
8	There have -- there have been times	02:21:17
9	following an argument that I chose to leave for	02:21:20
10	the reasons that I just mentioned, that instead of	02:21:23
11	taking the harder route of talking it out and	02:21:27
12	understanding what went wrong, it's easier to	02:21:29
13	physically or metaphorically leave the situation.	02:21:33
14	I wouldn't say that I had to as much as	02:21:38
15	it was my choice to leave at certain points.	02:21:40
16	Q. And how did Amber respond when you ran	02:21:44
17	away from her?	02:21:46
18	MS. BREDEHOFT: Objection to the form of	02:21:48
19	the question.	02:21:48
20	Go ahead.	02:21:50
21	A. I wouldn't say she was ever very happy	02:21:50
22	about it. Amber always wants to understand	02:21:55

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

113

1	something. Amber is -- Amber wants to work things	02:21:59
2	out. She -- she's not the person to just run away	02:22:03
3	from a problem ever.	02:22:07
4	So for me, at least in my experience or	02:22:09
5	arguments with her, she wasn't happy when I left	02:22:11
6	situations.	02:22:14
7	Q. When you say "she wasn't happy," she was	02:22:16
8	angry, wasn't she?	02:22:18
9	MS. BREDEHOFT: Objection to the form of	02:22:20
10	the question.	02:22:21
11	Go ahead.	02:22:22
12	A. I wouldn't say angry as much as	02:22:24
13	frustrated or sad.	02:22:26
14	Q. Okay. Let's -- let's pivot before we go	02:22:28
15	to some -- some more documents.	02:22:32
16	I've asked you about your sister's drug	02:22:34
17	use. I'm going to ask you just a few questions	02:22:37
18	about your own.	02:22:40
19	Have you ever used any non-prescription	02:22:41
20	drugs?	02:22:44
21	MS. BREDEHOFT: Objection to the form of	02:22:44
22	the question.	02:22:45

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

114

1	Go ahead.	02:22:46
2	A. Yes, I have.	02:22:48
3	Q. How old were you when you first used a	02:22:49
4	non-prescription drug?	02:22:51
5	MS. BREDEHOFT: Objection to the form of	02:22:53
6	the question.	02:22:54
7	Go ahead.	02:22:55
8	A. Are we including marijuana?	02:22:55
9	Q. Well, why don't we just take -- take	02:23:03
10	them one by one.	02:23:06
11	Have you ever used cocaine?	02:23:07
12	A. Yes.	02:23:09
13	Q. How many times have you used cocaine?	02:23:11
14	MS. BREDEHOFT: Objection to the form of	02:23:13
15	the question.	02:23:14
16	Go ahead.	02:23:15
17	A. I wouldn't be able to quantify how many	02:23:16
18	times.	02:23:19
19	Q. More than ten?	02:23:19
20	MS. BREDEHOFT: Objection to the form of	02:23:21
21	the question.	02:23:22
22	Go ahead.	02:23:23

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

115

1	A. Yes.	02:23:24
2	Q. More than 20?	02:23:25
3	MS. BREDEHOFT: Objection to the form of	02:23:26
4	the question.	02:23:27
5	Go ahead.	02:23:28
6	A. Yes.	02:23:29
7	Q. More than 30?	02:23:32
8	MS. BREDEHOFT: Same objection.	02:23:34
9	Go ahead.	02:23:35
10	A. I used cocaine a number of times. I	02:23:36
11	would -- if I had to guess, it was more than 30	02:23:41
12	times.	02:23:44
13	Q. How old were you when you first used	02:23:44
14	cocaine?	02:23:46
15	MS. BREDEHOFT: Objection to the form of	02:23:48
16	the question.	02:23:48
17	Go ahead.	02:23:49
18	A. I was already living here, so it had to	02:23:50
19	have been after I was 17 or 18.	02:23:55
20	Q. Were you ever addicted to cocaine?	02:23:58
21	MS. BREDEHOFT: Objection to the form of	02:24:00
22	the question.	02:24:01

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

116

1	Go ahead.	02:24:02
2	A. I wouldn't say so, no.	02:24:02
3	Q. When was the last time you used cocaine?	02:24:07
4	MS. BREDEHOFT: Objection to the form of	02:24:10
5	the question.	02:24:10
6	Go ahead.	02:24:11
7	A. I honestly can't recall.	02:24:14
8	Q. Have you ever used methamphetamines?	02:24:16
9	MS. BREDEHOFT: Objection to the form of	02:24:20
10	the question.	02:24:21
11	Go ahead.	02:24:22
12	A. No.	02:24:23
13	Q. Have you ever used MDMA?	02:24:24
14	MS. BREDEHOFT: Objection to the form of	02:24:27
15	the question.	02:24:28
16	Go ahead.	02:24:29
17	A. Yes.	02:24:31
18	Q. How many times?	02:24:32
19	MS. BREDEHOFT: Same objection.	02:24:34
20	Go ahead.	02:24:36
21	A. I'd say no more than five times.	02:24:36
22	Q. How old were you when you first used	02:24:42

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

117

1	MDMA?	02:24:44
2	MS. BREDEHOFT: Objection to the form of	02:24:45
3	the question.	02:24:46
4	Go ahead.	02:24:47
5	A. Again, I was already living out here, so	02:24:48
6	it had to have been after I was 17 or 18. I -- I	02:24:57
7	can't tell you specifically how old I was.	02:25:01
8	Q. Have you ever -- have you ever done	02:25:05
9	psychedelic drugs, like mushrooms?	02:25:07
10	MS. BREDEHOFT: Objection to the form of	02:25:09
11	the question.	02:25:10
12	Go ahead.	02:25:11
13	A. I have done mushrooms, yes.	02:25:14
14	Q. Okay. Have you ever used cocaine with	02:25:15
15	your sister Amber?	02:25:18
16	MS. BREDEHOFT: Objection to the form of	02:25:20
17	the question.	02:25:20
18	Go ahead.	02:25:21
19	A. As I stated earlier, once or twice when	02:25:22
20	we were much younger.	02:25:30
21	Q. How about MDMA, have you ever used MDMA	02:25:34
22	with Amber?	02:25:38

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

118

1	MS. BREDEHOFT: Objection to the form of	02:25:39
2	the question.	02:25:39
3	Go ahead.	02:25:40
4	A. I don't recall actually using it at the	02:25:43
5	same time as she.	02:25:45
6	Q. What about psychedelic drugs or	02:25:46
7	mushrooms?	02:25:49
8	MS. BREDEHOFT: Same objection.	02:25:50
9	Go ahead.	02:25:51
10	A. Once, I believe.	02:25:54
11	Q. When was the last time you did any	02:25:56
12	non-prescription drugs with your sister?	02:25:58
13	MS. BREDEHOFT: Objection to the form of	02:26:01
14	the question.	02:26:02
15	Go ahead.	02:26:03
16	A. I want to say The Island. I think it	02:26:03
17	was on one of The Island trips.	02:26:16
18	Q. And do you have a ballpark of what year	02:26:20
19	that might have been?	02:26:21
20	MS. BREDEHOFT: Objection to the form of	02:26:22
21	the question, to the use of "ballpark."	02:26:23
22	Go ahead.	02:26:27

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

119

1	A. I don't.	02:26:29
2	Q. All right. Let's -- let's move to a --	02:26:31
3	the subject of your sister's relationship with	02:26:34
4	Johnny Depp.	02:26:36
5	When did you first learn that Amber was	02:26:38
6	in a romantic relationship with him?	02:26:40
7	MS. BREDEHOFT: Objection to the form of	02:26:44
8	the question.	02:26:44
9	Go ahead.	02:26:45
10	A. Hard for me to say with any certainty	02:26:46
11	what year it was.	02:26:57
12	We were -- it was sometime after -- when	02:27:00
13	we were living on Orange together at some point,	02:27:07
14	but I -- I couldn't tell you, off the top of my	02:27:10
15	head, what year that was.	02:27:13
16	Q. Setting aside when it was, how did you	02:27:14
17	learn that your sister and Johnny were in a	02:27:16
18	romantic relationship?	02:27:19
19	MS. BREDEHOFT: Objection to the form of	02:27:20
20	the question.	02:27:21
21	Go ahead.	02:27:22
22	A. It would have -- it would have been a	02:27:23

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

120

1	conversation, I'm sure, but -- in terms of what	02:27:30
2	was specifically said, where we were, I can't	02:27:33
3	recall how I came to learn.	02:27:39
4	Q. And did there come a time when you	02:27:42
5	actually met Mr. Depp?	02:27:43
6	A. Yes.	02:27:45
7	Q. And during the period of your sister's	02:27:49
8	relationship and then marriage with Mr. Depp, did	02:27:52
9	you consider yourself close to him?	02:27:57
10	MS. BREDEHOFT: Objection to the form of	02:27:59
11	the question.	02:28:00
12	Go ahead.	02:28:01
13	A. Johnny and I became very close very	02:28:02
14	quickly into their relationship, yes.	02:28:08
15	Q. And you had nicknames for him, like	02:28:10
16	Hammer --	02:28:12
17	A. Yes.	02:28:13
18	Q. -- or Hammerhead and Mr. Hop; right?	02:28:13
19	A. (Nods head.)	02:28:17
20	Q. Have you ever done any non-prescription	02:28:18
21	drugs with Mr. Depp?	02:28:21
22	A. Yes.	02:28:23

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

121

1	Q. And what drugs have you done with	02:28:24
2	Mr. Depp?	02:28:26
3	MS. BREDEHOFT: Objection to the form of	02:28:27
4	the question.	02:28:28
5	Go ahead.	02:28:29
6	A. Primarily cocaine. I can't recall any	02:28:30
7	other illegal drugs we've done together.	02:28:34
8	Q. When was the first time that you and	02:28:36
9	Mr. Depp did cocaine together?	02:28:38
10	A. I can't recall a specific year or time	02:28:40
11	frame, unfortunately, but it was -- I remember	02:28:53
12	where we were, if that's -- but I don't know what	02:28:56
13	year it was or when it was.	02:28:59
14	Q. Was your sister Amber ever present there	02:29:02
15	when you did cocaine with Johnny Depp?	02:29:04
16	MS. BREDEHOFT: Objection to the form of	02:29:08
17	the question.	02:29:09
18	Go ahead.	02:29:10
19	A. I don't recall if she was in the room	02:29:12
20	or -- I don't recall if she was there or not, no.	02:29:14
21	Q. Was --	02:29:21
22	A. She might have been, but...	02:29:21

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

122

1	Q. I'm sorry for interrupting.	02:29:23
2	When was the last time you did cocaine	02:29:24
3	with Johnny Depp?	02:29:26
4	MS. BREDEHOFT: Objection to the form of	02:29:27
5	the question.	02:29:28
6	Go ahead.	02:29:29
7	A. I can't recall the last time I did it	02:29:31
8	with him.	02:29:33
9	Q. Was Amber there as well?	02:29:35
10	MS. BREDEHOFT: Same objection.	02:29:37
11	Go ahead.	02:29:39
12	A. No. No.	02:29:40
13	The last time I remember was on a plane	02:29:45
14	when it was -- where it was just him and I. Yeah.	02:29:49
15	I don't know who else was on the plane, but I know	02:29:54
16	Amber wasn't there.	02:29:56
17	Q. When you did cocaine, would you use a	02:29:58
18	tampon applicator to snort the cocaine?	02:30:00
19	MS. BREDEHOFT: Objection to the form of	02:30:03
20	the question.	02:30:04
21	Go ahead.	02:30:05
22	A. Yes.	02:30:06

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

123

1	Q. And you used cocaine before you met	02:30:07
2	Mr. Depp; true?	02:30:09
3	MS. BREDEHOFT: Objection to the form of	02:30:10
4	the question.	02:30:11
5	Go ahead.	02:30:12
6	A. Yes.	02:30:13
7	Q. So you would use a tampon applicator to	02:30:15
8	consume cocaine before you met Mr. Depp; right?	02:30:18
9	MS. BREDEHOFT: Objection to the form of	02:30:21
10	the question.	02:30:22
11	Go ahead.	02:30:23
12	A. Correct.	02:30:25
13	As I said, in the UK it was -- it was a	02:30:26
14	trick that I had shown him.	02:30:29
15	Q. Have you ever taken any drugs that were	02:30:31
16	actually prescribed to Mr. Depp?	02:30:32
17	MS. BREDEHOFT: Objection to the form of	02:30:35
18	the question.	02:30:36
19	Go ahead.	02:30:37
20	A. No.	02:30:39
21	Q. Do you recall asking Mr. Depp to give	02:30:41
22	you Adderall pills that had been prescribed to	02:30:44

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

124

1	him?	02:30:46
2	MS. BREDEHOFT: Objection to the form of	02:30:48
3	the question.	02:30:49
4	Go ahead.	02:30:50
5	A. I don't recall asking him for Adderall.	02:30:52
6	I -- I had my own prescription at one point, so I	02:30:55
7	don't know why I would ask him.	02:30:57
8	Q. Did you ever take any of Mr. Depp's	02:30:59
9	Adderall pills without first asking him?	02:31:01
10	MS. BREDEHOFT: Objection to the form of	02:31:04
11	the question.	02:31:05
12	Go ahead.	02:31:06
13	A. No.	02:31:08
14	Q. Okay. Did you ever take any other drugs	02:31:09
15	that had been prescribed to -- for Mr. Depp?	02:31:15
16	Correct?	02:31:20
17	MS. BREDEHOFT: Objection to the form of	02:31:20
18	the question.	02:31:21
19	Go ahead.	02:31:22
20	A. No. I have never taken his medication.	02:31:23
21	Q. Okay. All right. Now we're -- we're	02:31:27
22	going to talk about what we call the painting	02:31:30

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

125

1	incident in March of 2013.	02:31:32
2	So if you could please look at what's	02:31:36
3	been marked as Exhibit 3.	02:31:38
4	REMOTE TECHNICIAN: Stand by.	02:31:40
5	(Exhibit 3 was marked for identification	02:31:40
6	and is attached to the transcript.)	02:31:40
7	Q. And, again, I'm just going to ask you	02:31:43
8	about one section of that that relates to this one	02:31:44
9	incident.	02:31:47
10	This is your witness statement from the	02:31:57
11	UK. And the first thing I'm going to ask you to	02:31:59
12	do is turn to page 20, please, and let me know if	02:32:15
13	that's your signature.	02:32:18
14	A. Yes.	02:32:21
15	Q. And do you recognize this document as	02:32:23
16	your witness statement?	02:32:24
17	MS. BREDEHOFT: Objection to the form of	02:32:28
18	the question.	02:32:29
19	A. Yes, this page.	02:32:32
20	Q. Okay. Now I'm -- I'm just going to ask	02:32:33
21	you about what you describe as the painting	02:32:35
22	incident. I'm not going to ask you about anything	02:32:37

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

126

1	else in this document. So it's on page 9 of this	02:32:39
2	document, in the middle of the page. It says,	02:32:42
3	"Painting incident, 8 March 2013."	02:32:46
4	Do you see that?	02:32:50
5	MS. BREDEHOFT: Objection to the form --	02:32:51
6	A. I can --	02:32:53
7	MS. BREDEHOFT: Let me -- let me get my	02:32:53
8	objection out.	02:32:55
9	Objection to the form of the question,	02:32:55
10	improper use of prior testimony.	02:32:57
11	Go ahead.	02:32:59
12	Q. Okay. Now, you describe an incident	02:33:00
13	here that allegedly occurred at Amber's apartment;	02:33:03
14	correct?	02:33:07
15	MS. BREDEHOFT: Same objection.	02:33:07
16	Can I just have a continuing objection	02:33:09
17	so I don't take up your time?	02:33:10
18	MR. CHEW: Yes, please.	02:33:13
19	MS. BREDEHOFT: Improper use of the --	02:33:13
20	MR. CHEW: Yes.	02:33:15
21	MS. BREDEHOFT: Let me put it on the	02:33:16
22	record.	02:33:17

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

127

1	Improper use of the witness statement	02:33:17
2	for -- with this witness for impeachment.	02:33:20
3	MR. CHEW: Okay.	02:33:22
4	MS. BREDEHOFT: Go ahead.	02:33:22
5	I'll just keep -- if I can just reserve	02:33:23
6	that, then I don't have to say it every time.	02:33:25
7	MR. CHEW: You can reserve it. I won't	02:33:27
8	object to that --	02:33:29
9	MS. BREDEHOFT: Okay.	02:33:30
10	MR. CHEW: -- to you objecting later.	02:33:30
11	MS. BREDEHOFT: Thank you.	02:33:32
12	MR. CHEW: Yeah.	02:33:32
13	BY MR. CHEW:	02:33:34
14	Q. So the question was: In this witness	02:33:34
15	statement, you describe under oath an incident	02:33:37
16	here that allegedly occurred at Amber's apartment;	02:33:39
17	correct?	02:33:41
18	MS. BREDEHOFT: I am going to object to	02:33:45
19	the form of the question. That's a different	02:33:47
20	objection.	02:33:48
21	Go ahead.	02:33:49
22	A. May I make it larger, please? I know	02:33:50

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

128

1	the answer to the question, but I -- it's hard for	02:33:53
2	me to see.	02:33:55
3	Q. No, sure.	02:33:56
4	A. The painting incident, yes, it occurred	02:33:57
5	at -- it was actually our home at the time on	02:33:59
6	Orange, yes.	02:34:02
7	Q. And this is an apartment with -- where	02:34:04
8	you lived with Amber and Lisa; is that correct?	02:34:07
9	MS. BREDEHOFT: Objection to the form of	02:34:10
10	the question.	02:34:11
11	Go ahead.	02:34:12
12	A. No, sir. It was a house. And at the	02:34:13
13	time, this was just Amber and I living at this	02:34:16
14	house.	02:34:19
15	Q. Gotcha. Gotcha.	02:34:20
16	And this alleged incident occurred	02:34:22
17	before going to a set of a Keith Richards	02:34:24
18	documentary Mr. Depp was working on; true?	02:34:27
19	MS. BREDEHOFT: Objection to the form of	02:34:29
20	the question.	02:34:30
21	Go ahead.	02:34:31
22	A. Yes.	02:34:32

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

129

1	Q. And when you testified at the UK trial,	02:34:35
2	you changed your testimony about this incident;	02:34:37
3	right?	02:34:38
4	MS. BREDEHOFT: Objection to the form of	02:34:39
5	the question.	02:34:40
6	Go ahead.	02:34:41
7	A. The -- the dates were the -- the date	02:34:47
8	and the painting, I believe.	02:34:53
9	Q. Right.	02:34:54
10	And that's what we -- we talked about at	02:34:54
11	the very beginning of the deposition --	02:34:56
12	A. Uh-huh.	02:34:58
13	Q. -- when I showed you Exhibit 16. You	02:34:58
14	recall that; correct?	02:35:01
15	MS. BREDEHOFT: Objection to the form of	02:35:02
16	the question.	02:35:03
17	Go ahead.	02:35:04
18	A. Yes.	02:35:04
19	Q. And you testified that that part of your	02:35:06
20	actual live testimony at the UK action, that this	02:35:10
21	incident actually occurred on March 22, 2013;	02:35:16
22	right?	02:35:19

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

130

1	MS. BREDEHOFT: Objection to the form of	02:35:19
2	the question.	02:35:20
3	Go ahead.	02:35:21
4	A. It was around -- it was later in March.	02:35:23
5	I can't recall specifically.	02:35:25
6	Q. And you've already told us you can't	02:35:28
7	exactly remember when you realized that you had	02:35:31
8	made a mistake; correct?	02:35:34
9	MS. BREDEHOFT: Objection to the form of	02:35:35
10	the question.	02:35:36
11	Go ahead.	02:35:37
12	A. Correct. I -- I wouldn't be able to	02:35:40
13	tell when you it was realized.	02:35:41
14	Q. And other than the date, is there	02:35:43
15	anything else about this incident that you	02:35:45
16	testified to in your witness statement that you	02:35:47
17	believe, sitting here today, was incorrect?	02:35:51
18	MS. BREDEHOFT: Objection to the form of	02:35:54
19	the question.	02:35:55
20	Go ahead.	02:35:56
21	A. The -- the paintings themselves were the	02:35:56
22	ones that I mixed up. There were two different	02:36:01

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

131

1	paintings that were defaced. In my -- my memory	02:36:05
2	mixed the two paintings up. So instead of the one	02:36:11
3	that said van -- van Ree that was changed to	02:36:18
4	van Pee, it was actually a different painting that	02:36:21
5	looked like Flamingos or cherries.	02:36:24
6	Q. And to be clear, you didn't actually	02:36:27
7	witness any physical altercation between Mr. Depp	02:36:30
8	and Amber Heard on March 8th, 2013; correct?	02:36:34
9	A. Again, March 8 isn't the correct date.	02:36:43
10	But on either instance, I did not -- did	02:36:45
11	not witness violence on those dates.	02:36:48
12	Q. Great. Thank you.	02:36:50
13	Now let's move ahead to Exhibit 4.	02:36:52
14	REMOTE TECHNICIAN: Stand by.	02:36:55
15	(Exhibit 4 was marked for identification	02:36:55
16	and is attached to the transcript.)	02:36:55
17	Q. And I will just represent, while the	02:36:56
18	technician is queuing those up, that these are	02:36:58
19	more texts that you produced between you and	02:37:03
20	Johnny Depp.	02:37:06
21	REMOTE TECHNICIAN: Showing Exhibit 4 on	02:37:10
22	the screen.	02:37:11

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

132

1	MS. BREDEHOFT: Do you have the Bates	02:37:13
2	stamp because it's not showing on mine?	02:37:13
3	MR. CHEW: Yes. It's 1-8 -- strike	02:37:16
4	that.	02:37:18
5	It's WH27 through 31.	02:37:19
6	MS. BREDEHOFT: Thank you.	02:37:22
7	MR. CHEW: And unlike the e-mails, they	02:37:23
8	actually go in the proper order.	02:37:24
9	BY MR. CHEW:	02:37:26
10	Q. So if I could just show you the first	02:37:29
11	page of this.	02:37:32
12	These are text messages between you and	02:37:34
13	Amber from March 22, 2013; correct?	02:37:39
14	A. It's really, really small. Again, I	02:37:43
15	hate to be...	02:37:45
16	But I can't see it.	02:37:48
17	Q. No, no, no. You're absolutely entitled	02:37:49
18	to that.	02:37:51
19	You might want to go up to the top of	02:37:52
20	the page so you can confirm that these are	02:37:54
21	actually between you and your sister.	02:37:58
22	Is that -- am I correct?	02:38:00

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

133

1	A. Yeah. Amber, yeah. So -- yeah. Okay.	02:38:01
2	So it's Amber and I.	02:38:04
3	Q. Okay. And these first messages on this	02:38:07
4	page with Amber start a little after 12:30 p.m.;	02:38:09
5	true?	02:38:13
6	A. Yes.	02:38:14
7	Q. Fair to say that you and Amber were not	02:38:17
8	in the same place at the time you were texting	02:38:19
9	each other?	02:38:22
10	MS. BREDEHOFT: Objection to the form of	02:38:22
11	the question.	02:38:23
12	Go ahead.	02:38:24
13	A. I would assume so.	02:38:28
14	Q. And does it appear that Amber was at the	02:38:29
15	apartment on Orange at the time of these texts?	02:38:31
16	MS. BREDEHOFT: Objection to the form of	02:38:37
17	the question.	02:38:38
18	Go ahead.	02:38:39
19	A. I don't know where she was when she sent	02:38:39
20	these messages.	02:38:41
21	Q. Where were you?	02:38:42
22	A. I can't recall.	02:38:43

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

134

1	Q. Did you wake up at the Orange apartment	02:38:49
2	that morning?	02:38:51
3	MS. BREDEHOFT: Objection to the form of	02:38:53
4	the question.	02:38:54
5	Go ahead.	02:38:55
6	A. It's possible I wasn't there. At the	02:38:57
7	time, I was seeing somebody. I might have been at	02:39:02
8	his apartment. So I -- I can't say for certain	02:39:04
9	where I was.	02:39:09
10	Q. And at the time you had this exchange	02:39:09
11	with your sister, when was the last time you had	02:39:12
12	seen Amber?	02:39:15
13	MS. BREDEHOFT: Objection to the form of	02:39:17
14	the question.	02:39:18
15	Go ahead.	02:39:19
16	A. I can't recall.	02:39:22
17	Q. And when was the last time you had seen	02:39:23
18	Johnny Depp?	02:39:25
19	MS. BREDEHOFT: Objection to the form of	02:39:27
20	the question.	02:39:27
21	Go ahead.	02:39:28
22	A. I don't know when the last time I was --	02:39:30

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

135

1	or last time I saw either of them was.	02:39:32
2	Q. Okay. So if you look toward -- just	02:39:35
3	below the middle of the first page, do you see the	02:39:38
4	text message saying, "So meet at your house at 3"?	02:39:40
5	Do you see that?	02:39:47
6	MS. BREDEHOFT: Objection to the form of	02:39:48
7	the question --	02:39:49
8	A. Yes.	02:39:49
9	MS. BREDEHOFT: -- go ahead.	02:39:49
10	A. I see that.	02:39:50
11	Q. And you're referring to the house on	02:39:52
12	Orange; right?	02:39:54
13	A. Uh-huh.	02:39:55
14	Q. Now turning to the next page, WH28, do	02:39:58
15	you see the text message from Amber at 3:08 p.m.	02:40:04
16	where she writes, quote, "Johnny is still over and	02:40:07
17	we're fighting... so please don't come in yet,"	02:40:11
18	unquote?	02:40:14
19	Do you see that?	02:40:18
20	Those are actually the two text messages	02:40:19
21	I think you're looking at. Do you see that?	02:40:22
22	MS. BREDEHOFT: Objection to the form of	02:40:26

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

136

1	the question.	02:40:25
2	Go ahead.	02:40:26
3	A. I do see those messages.	02:40:26
4	Q. Do you know what Amber meant by, quote,	02:40:28
5	"Johnny is still" -- strike that.	02:40:30
6	Do you know what Amber meant by, quote,	02:40:32
7	"Johnny is over still," unquote?	02:40:34
8	MS. BREDEHOFT: Objection to the form of	02:40:37
9	the question.	02:40:37
10	Go ahead.	02:40:38
11	A. You would have to ask Amber for certain,	02:40:40
12	but I would take this to mean that he is at	02:40:43
13	Orange.	02:40:46
14	Q. And you returned to Orange later that	02:40:48
15	day; correct?	02:40:50
16	MS. BREDEHOFT: Objection to the form of	02:40:52
17	the question.	02:40:52
18	Go ahead.	02:40:53
19	A. Yes.	02:40:55
20	Q. And was Amber there when you arrived	02:40:56
21	back at Orange?	02:40:58
22	MS. BREDEHOFT: Objection to the form of	02:41:02

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

137

1	the question.	02:41:03
2	Go ahead.	02:41:04
3	A. They were both there, yes.	02:41:04
4	Q. When you came back, did you observe any	02:41:06
5	injuries to Amber?	02:41:09
6	MS. BREDEHOFT: Objection to the form of	02:41:12
7	the question.	02:41:12
8	Go ahead.	02:41:13
9	A. At the time, I -- I didn't know what	02:41:14
10	they were. Her -- her face was swollen, as was	02:41:20
11	her lip, but I wasn't sure what it was. I wasn't	02:41:26
12	sure -- like I said, it was early on at this	02:41:29
13	point. I wasn't aware of the violence that had	02:41:31
14	been happening. So at the time, I think I just	02:41:35
15	attributed it to her being upset and crying.	02:41:38
16	Q. When you -- when you say "her face was	02:41:42
17	swollen," could you please describe for us briefly	02:41:44
18	what you saw?	02:41:47
19	A. She -- I don't know how else to describe	02:41:54
20	it. She just looked like -- her face was swollen.	02:41:55
21	I don't know how to say it more clearly. I	02:42:02
22	apologize.	02:42:04

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

• 138

1	Q. No, no. I'm just trying to get at: Was	02:42:04
2	it her entire face or was it a part of her face	02:42:07
3	that was swollen?	02:42:10
4	A. No. Her face was just kind of -- was	02:42:12
5	kind of puffy.	02:42:14
6	And like I said, there appeared to be	02:42:15
7	some sort of -- if memory serves, some sort of cut	02:42:17
8	on her lip, but I wasn't sure what that was	02:42:21
9	attributed to.	02:42:25
10	Q. Yeah, I was going to ask that next. So	02:42:27
11	there was a general puffiness on her face. What	02:42:29
12	specifically do you recall observing about her	02:42:32
13	lip?	02:42:34
14	A. Again, it just appeared -- it just	02:42:35
15	appeared right -- like, it was visible that there	02:42:42
16	was, like, something. I don't know, an injury. I	02:42:45
17	didn't attribute it as an injury at some point,	02:42:49
18	but her lip looked weird to me, her bottom lip	02:42:51
19	looked weird.	02:42:55
20	Q. What was Mr. Depp doing when you	02:42:56
21	arrived?	02:42:58
22	A. He was sitting on -- in the breakfast	02:42:59

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

139

1	nook of Orange. It's like you walk in, turn,	02:43:02
2	there's a dining room, and then there's a little	02:43:06
3	separate breakfast nook. There was a big glass	02:43:08
4	table. He was sitting at it. There was a --	02:43:10
5	basically an empty bottle of booze in front of	02:43:16
6	him. There was cocaine, cigarette butts	02:43:20
7	everywhere. He was smoking. He had his glasses	02:43:22
8	on. He was just sitting at that breakfast nook.	02:43:25
9	Q. Now directing your attention to the	02:43:29
10	third page of Exhibit 4, that's WH29, do you see	02:43:31
11	the text messages from Amber at 4:21 p.m. that	02:43:36
12	says, quote, "How is it? Just tell him I love	02:43:41
13	him, please," unquote?	02:43:44
14	Do you see that?	02:43:46
15	A. Let me -- okay. 3:22, yes.	02:43:47
16	Q. And the "him" that your sister is	02:43:51
17	referring to there is Johnny Depp; correct?	02:43:53
18	A. Yes.	02:43:57
19	MS. BREDEHOFT: Objection to the form of	02:43:57
20	the question.	02:43:58
21	Go ahead.	02:43:59
22	Q. So by this point, you were with	02:43:59

CONFIDENTIAL
Transcript of Whitney Henriquez
• Conducted on February 3, 2022

140

1	Mr. Depp; correct?	02:44:01
2	A. Correct.	02:44:03
3	Q. And what were you and Mr. Depp doing	02:44:04
4	together?	02:44:07
5	A. So I was called over there to talk to	02:44:09
6	him and to hopefully help get him out of the	02:44:12
7	house.	02:44:17
8	So I was talking to him, just trying to	02:44:19
9	understand what he was upset about, why he didn't	02:44:21
10	want to leave. But again, he was just drinking	02:44:23
11	and, you know, rambling. It was really hard to	02:44:30
12	get out of him what he was upset about.	02:44:37
13	He was talking about things that didn't	02:44:39
14	really make sense or were hard for me to connect.	02:44:41
15	He was just drinking and smoking and rambling.	02:44:43
16	Q. Now directing your attention to the	02:44:48
17	fourth page, that's WH 30, do you see where you	02:44:49
18	write to Amber at 7:18 p.m., quote, "Shut up.	02:44:53
19	Don't thank me for anything. I just wish I could	02:44:57
20	feel my face," unquote?	02:45:00
21	Do you see that?	02:45:03
22	A. Yes.	02:45:03

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

141

1	Q. What do you mean or what did you mean	02:45:08
2	when you said, "I just wish I could feel my face"?	02:45:10
3	MS. BREDEHOFT: Objection to the form of	02:45:13
4	the question.	02:45:13
5	Go ahead.	02:45:14
6	A. I don't know.	02:45:15
7	Q. And you had just been doing cocaine with	02:45:24
8	Mr. Depp; right?	02:45:26
9	Isn't that why you said, "I wish I could	02:45:29
10	feel my face"?	02:45:31
11	A. That would make sense.	02:45:33
12	MS. BREDEHOFT: Objection to the form of	02:45:34
13	the question.	02:45:34
14	Go ahead.	02:45:35
15	A. That would make sense.	02:45:36
16	I might have done cocaine with him. I	02:45:37
17	can't remember for sure.	02:45:39
18	Q. And if you look a little further down	02:45:40
19	the page, Amber appears to laugh in response to	02:45:42
20	your saying, "I just wish I could feel my face."	02:45:46
21	Do you see that?	02:45:50
22	MS. BREDEHOFT: Objection to the form of	02:45:51

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

142

1	the question.	02:45:51
2	Go ahead.	02:45:52
3	A. Yes. She said, "Ha Ha."	02:45:53
4	Q. Yeah.	02:45:55
5	I mean, specifically she sent you a	02:45:56
6	message at 7:19 p.m. where she says, "Ha Ha Ha";	02:45:57
7	right?	02:46:01
8	MS. BREDEHOFT: Objection to the form of	02:46:02
9	the question.	02:46:03
10	Go ahead.	02:46:04
11	A. She was either laughing at that or the	02:46:04
12	fact that I was telling her to shut up. I don't	02:46:08
13	know.	02:46:10
14	Q. Your next message to Amber was at 7:33	02:46:10
15	p.m. Do you see that?	02:46:14
16	A. "Got Kyle to take me home."	02:46:15
17	Q. Who is Kyle?	02:46:24
18	A. I don't know. I imagine maybe one of	02:46:25
19	his security guards.	02:46:32
20	Q. Okay. And from where did Kyle take you	02:46:33
21	home?	02:46:35
22	MS. BREDEHOFT: Objection to the form of	02:46:37

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

143

1	the question.	02:46:37
2	Go ahead.	02:46:38
3	A. So at some point, at Orange, I was able	02:46:40
4	to talk to Johnny and get him off the ledge and	02:46:45
5	get him in the car. We drove to 80. We dropped	02:46:48
6	him off at 80 so he could resume shooting.	02:46:53
7	I left Amber there with Christi, his	02:46:57
8	sister. And so I -- if memory serves, a gentleman	02:47:00
9	took me from 80 to my house downtown.	02:47:06
10	Q. Was that -- did he take you back to	02:47:11
11	Orange?	02:47:13
12	MS. BREDEHOFT: Objection to the form of	02:47:14
13	the question.	02:47:15
14	Go ahead.	02:47:15
15	A. So, no. I -- and I should go back and	02:47:17
16	clarify.	02:47:21
17	So when -- Amber and I initially moved	02:47:22
18	into Orange together when my partner and I at the	02:47:24
19	time had been separated. But in the period of me	02:47:27
20	living there, my partner and I had reconciled, so	02:47:31
21	I moved back in with him downtown and she still	02:47:34
22	had her place on Orange.	02:47:37

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

144

1	Q. And who was your partner at the time?	02:47:39
2	MS. BREDEHOFT: Objection to the form of	02:47:41
3	the question.	02:47:42
4	Go ahead.	02:47:43
5	A. His name was Shawn.	02:47:44
6	Q. And what was his last name?	02:47:48
7	MS. BREDEHOFT: Objection to the form of	02:47:50
8	the question.	02:47:52
9	Go ahead.	02:47:53
10	Q. Was that Shawn Kazinsky [sic]?	02:47:53
11	A. Close. Krajewski.	02:47:55
12	Q. Would you please spell that for us?	02:47:57
13	MS. BREDEHOFT: Objection to the form of	02:47:59
14	the question.	02:47:59
15	Go ahead.	02:48:01
16	A. K-R-A-J-E-W-S-K-I.	02:48:02
17	Q. Did you and Mr. Krajewski ever have any	02:48:11
18	violent altercations?	02:48:15
19	MS. BREDEHOFT: Objection to the form of	02:48:17
20	the question.	02:48:18
21	Go ahead.	02:48:19
22	A. No.	02:48:19

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

145

1	Q. So he never hit you?	02:48:22
2	MS. BREDEHOFT: Objection to the form of	02:48:24
3	the question.	02:48:25
4	Go ahead.	02:48:25
5	A. No.	02:48:27
6	Q. You never hit him?	02:48:28
7	MS. BREDEHOFT: Objection to the form of	02:48:30
8	the question.	02:48:30
9	Go ahead.	02:48:31
10	A. No.	02:48:33
11	Q. Did you ever have a physical fight with	02:48:35
12	Amber Heard while Mr. Krajewski and Mr. Depp were	02:48:37
13	waiting outside?	02:48:42
14	MS. BREDEHOFT: Objection to the form of	02:48:44
15	the question.	02:48:45
16	Go ahead.	02:48:46
17	A. Outside -- no.	02:48:46
18	Q. Okay. So going back to after Kyle --	02:48:51
19	after Kyle took you home, was that the last time	02:48:53
20	you saw Mr. Depp that day?	02:48:55
21	MS. BREDEHOFT: Object to the form of	02:48:59
22	the question.	02:48:59

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

146

1	Go ahead.	02:49:00
2	A. When we dropped him off at 80, yes, that	02:49:01
3	would have been the last time I saw him that day.	02:49:03
4	Q. And to be very clear, on March 22, 2013,	02:49:05
5	did you see Mr. Depp physically assault your	02:49:10
6	sister Amber in any way?	02:49:13
7	A. I did not see it that instance, no.	02:49:18
8	Q. So you didn't see him hit her, push her,	02:49:21
9	grab her or pull her hair; correct?	02:49:24
10	MS. BREDEHOFT: Objection to the form of	02:49:26
11	the question.	02:49:27
12	Go ahead.	02:49:28
13	A. Not on that date, no.	02:49:28
14	Q. How did you get to the Keith Richards	02:49:31
15	set?	02:49:33
16	A. We all left Orange together. From	02:49:34
17	Orange to 80, we would have been driven by one of	02:49:41
18	his security guards.	02:49:46
19	Q. And when you say "you all," who was the	02:49:47
20	group who was driven to the Keith Richards set by	02:49:49
21	one of his security guards?	02:49:52
22	MS. BREDEHOFT: Objection to the form of	02:49:55

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

147

1	the question.	02:49:56
2	A. Amber's not -- sorry.	02:49:57
3	Amber, Johnny, and I.	02:50:00
4	Q. Did Amber say anything you can recall on	02:50:05
5	the way to the set?	02:50:08
6	MS. BREDEHOFT: Objection to the form of	02:50:13
7	the question.	02:50:14
8	Go ahead.	02:50:15
9	A. No. No, she was very quiet.	02:50:15
10	Q. Okay. Okay. Let's move to Exhibit 5,	02:50:18
11	please.	02:50:21
12	REMOTE TECHNICIAN: Stand by.	02:50:22
13	(Exhibit 5 was marked for identification	02:50:22
14	and is attached to the transcript.)	02:50:22
15	Q. Which, for the record, is a photograph	02:50:28
16	that bears the Bates Number Depp 11928.	02:50:30
17	REMOTE TECHNICIAN: Showing Exhibit 5 on	02:50:40
18	the screen.	02:50:41
19	Q. Ms. Henriquez, have you ever seen this	02:50:47
20	picture before?	02:50:48
21	MS. BREDEHOFT: Objection to the form of	02:50:49
22	the question.	02:50:50

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

148

1	Go ahead.	02:50:51
2	A. Yes, it looks familiar.	02:50:51
3	Q. What is it, for the record?	02:50:55
4	A. That is the table that was in the	02:50:57
5	breakfast nook of Orange. Appears to be cocaine,	02:51:03
6	a pill box that says, "Property of J.D.," a glass	02:51:12
7	of something, a rolled cigarette -- I'm sorry. Is	02:51:18
8	there a way to, like, turn it? Oh, I don't have	02:51:23
9	control.	02:51:26
10	REMOTE TECHNICIAN: (Complies.)	02:51:28
11	THE WITNESS: Thank you.	02:51:29
12	A. There's a pen, paper, somebody's phone,	02:51:30
13	one of -- like a to-go tumbler that has Johnny's	02:51:35
14	studio or production company logo, and a -- a CD	02:51:40
15	and a bag.	02:51:44
16	Q. Were you physically present when this	02:51:45
17	photograph was taken?	02:51:47
18	A. I was not.	02:51:49
19	I think that was one of the issues that	02:51:54
20	was -- I think that was one of the things that was	02:51:56
21	displayed during the UK, that I was not there when	02:51:59
22	this photo was taken.	02:52:02

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

149

1	Q. Do you know when the picture was taken?	02:52:04
2	A. I don't recall a specific time or date.	02:52:08
3	Q. Do you know who took the picture?	02:52:11
4	A. It had to have been Johnny or whoever	02:52:18
5	else was there.	02:52:22
6	Q. Why do you say "it had to have been	02:52:26
7	Johnny"?	02:52:28
8	A. If Johnny was there. It was Johnny or	02:52:29
9	Amber, whoever was in the house that day.	02:52:31
10	Q. And you -- I believe -- please correct	02:52:34
11	me if I'm wrong. You said there's cocaine in this	02:52:35
12	picture; true?	02:52:38
13	A. Yes.	02:52:40
14	Q. And the tampon applicator; right?	02:52:41
15	A. Yes.	02:52:44
16	Q. Is that your tampon applicator?	02:52:44
17	MS. BREDEHOFT: Objection to the form of	02:52:47
18	the question.	02:52:48
19	Go ahead.	02:52:49
20	A. That's not mine. It might have been one	02:52:50
21	that I gave him. As I testified before, it was a	02:52:52
22	trick that I showed him. So at any point, he had	02:52:55

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

150

1	his own in his pocket that I might have given to	02:52:59
2	him.	02:53:03
3	Q. Did you use any of the cocaine that's	02:53:03
4	depicted here in Exhibit 5?	02:53:06
5	MS. BREDEHOFT: Objection to the form of	02:53:09
6	the question.	02:53:09
7	Go ahead.	02:53:10
8	A. I can't answer that with certainty	02:53:11
9	because I don't know when this was -- I can't	02:53:13
10	recall when this was taken or when this was --	02:53:15
11	what time or date it was taken.	02:53:19
12	But I know, again, in the UK, Mr. Wass	02:53:22
13	confirmed, via like timestamp or whatever, that I	02:53:26
14	actually wasn't there at the time. Whether I	02:53:29
15	showed up later, I have -- I don't know.	02:53:31
16	Q. Who's phone --	02:53:34
17	A. I have --	02:53:35
18	Q. Who's phone is in the background of this	02:53:36
19	picture?	02:53:39
20	MS. BREDEHOFT: Objection to the form of	02:53:40
21	the question.	02:53:40
22	Go ahead.	02:53:41

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

151

1	A. I don't know.	02:53:42
2	Q. And there appears -- I think you said	02:53:45
3	there appears to be a cigarette in this picture as	02:53:47
4	well; correct?	02:53:49
5	MS. BREDEHOFT: Objection to the form of	02:53:50
6	the question.	02:53:51
7	Go ahead.	02:53:52
8	A. Correct. It looks like a -- one of his	02:53:53
9	rolled cigarettes, and then the tobacco next to	02:53:55
10	it.	02:53:59
11	Q. So when you say "his," it's your	02:54:02
12	understanding that was Mr. Depp's?	02:54:04
13	A. Yes.	02:54:06
14	I -- he always had tobacco and rolled	02:54:07
15	cigarettes on him.	02:54:10
16	Q. Okay. And going back to your witness	02:54:15
17	statement that is -- do you recall testifying that	02:54:17
18	when you arrived at the Orange -- at the Orange	02:54:22
19	home to talk to Mr. Depp, that he told you he was	02:54:26
20	upset about a painting by Amber's ex, Tasya	02:54:30
21	van Ree?	02:54:34
22	Do you recall that?	02:54:37

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

152

1	MS. BREDEHOFT: Objection to the form of	02:54:38
2	the question.	02:54:38
3	Go ahead.	02:54:39
4	A. Not initially. That was one of the	02:54:40
5	reasons that came out after I had been speaking to	02:54:44
6	him, but he was also upset about another friend of	02:54:46
7	Amber's -- sorry, I'm spacing on names -- Marie.	02:54:54
8	She -- I guess, Amber -- they had been	02:55:03
9	photographed together at some point, and he was	02:55:06
10	upset about that as well.	02:55:09
11	Q. And specifically, do you recall	02:55:12
12	testifying that Amber told you that Mr. Depp had	02:55:13
13	tried to burn the painting, but when that failed,	02:55:17
14	he scratched out Ms. van Ree's signature to read,	02:55:20
15	quote, "Tasya van Pee," unquote?	02:55:24
16	Right?	02:55:29
17	MS. BREDEHOFT: Objection to the form of	02:55:29
18	the question and improper use of prior	02:55:30
19	testimony.	02:55:32
20	Go ahead.	02:55:33
21	A. That was -- that was, again, one of the	02:55:33
22	things that I -- my memory had mixed up the two	02:55:38

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

153

1	and one of the things that was cleared up in the	02:55:42
2	UK trial.	02:55:44
3	Q. Right.	02:55:45
4	And so --	02:55:45
5	A. And they were --	02:55:46
6	Q. So -- I'm sorry. I interrupted you.	02:55:47
7	Please continue.	02:55:49
8	A. They were two different paintings.	02:55:49
9	Q. So when you -- and -- again, so when you	02:55:51
10	testified at the UK trial, you testified that	02:55:53
11	Mr. Depp only tried to burn the painting on this	02:55:56
12	occasion; correct?	02:55:59
13	MS. BREDEHOFT: Objection to the form of	02:56:00
14	the question, and misuse of the prior	02:56:01
15	testimony.	02:56:05
16	Go ahead.	02:56:06
17	Improper use.	02:56:06
18	Go ahead.	02:56:07
19	A. Again, I testified that one painting	02:56:09
20	had -- had attempted to be burned, and another	02:56:14
21	painting, separate entirely, had been -- somebody	02:56:19
22	wrote -- he wrote "pee" on it as opposed to	02:56:21

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

154

1	van Ree.	02:56:24
2	Q. Okay.	02:56:25
3	MR. CHEW: Let's move -- let's please	02:56:25
4	show the witness what has been marked as	02:56:27
5	Exhibit 6.	02:56:29
6	(Exhibit 6 was marked for identification	02:56:29
7	and is attached to the transcript.)	02:56:29
8	Q. And I'll represent to you that these are	02:56:33
9	text messages between you and Mr. Depp.	02:56:35
10	MR. CHEW: For Ms. Bredehoft's benefit,	02:56:41
11	the Bates numbers are Depp 12672 to 12674.	02:56:43
12	REMOTE TECHNICIAN: Stand by.	02:56:50
13	Q. They're, mercifully, short, and they're	02:56:51
14	also in large type.	02:56:54
15	MS. BREDEHOFT: You're learning.	02:56:56
16	MR. CHEW: Yes. Well, you know, we're	02:56:57
17	often just producing them in the form that we	02:56:59
18	receive them. These happen to be ours. But	02:57:01
19	I am learning.	02:57:03
20	Q. Do you recognize this Exhibit 6 as a	02:57:19
21	series of text messages between you and Mr. Depp	02:57:23
22	on February 11th, 2014?	02:57:26

R

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

155

R	1	MS. BREDEHOFT: Objection to the form of	02:57:28
	2	the question.	02:57:28
	3	And he just asked you about a series, so	02:57:29
	4	make sure you review.	02:57:31
	5	THE WITNESS: Yeah.	02:57:36
	6	A. Right now I only see one message or two	02:57:36
	7	messages --	02:57:38
	8	Q. Okay. There's three pages, so why don't	02:57:38
	9	you look at them. I think there's one message on	02:57:41
	10	each page or one set of messages on each page.	02:57:43
	11	A. Can I get control of the screen.	02:57:48
	12	MS. BREDEHOFT: Yeah. Lucien can give	02:57:49
	13	you control. You ask him for it and he can	02:57:51
	14	give it to you.	02:57:53
	15	THE WITNESS: I have it.	02:57:54
	16	MS. BREDEHOFT: That might make it go a	02:57:55
	17	little faster. Yes.	02:57:56
	18	BY MR. CHEW:	02:58:26
	19	Q. Okay. And if you wouldn't mind	02:58:26
	20	scrolling back to the beginning because I'm going	02:58:28
	21	to ask you about these in order.	02:58:31
	22	Okay. Perfect.	02:58:33

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

156

R	1	So Mr. Depp's messages are the one in	02:58:34
	2	the darker bubbles; correct?	02:58:41
	3	A. Yes.	02:58:44
	4	Q. And yours are the one in the lighter	02:58:45
	5	bubbles; true?	02:58:47
	6	A. Correct.	02:58:50
	7	Q. What is this picture that was sent on	02:58:51
	8	February 11th, 2014?	02:58:54
	9	A. That's the photo of the van Pee	02:59:00
	10	painting.	02:59:02
	11	Q. Yes.	02:59:03
	12	And this is the picture that Mr. Depp	02:59:05
	13	sent to you; true?	02:59:08
	14	MS. BREDEHOFT: Objection to the form of	02:59:11
	15	the question.	02:59:11
	16	Go ahead.	02:59:12
	17	A. Well, it looks like I took the photo and	02:59:13
	18	sent it to him.	02:59:15
	19	Q. At -- but this is the picture on which	02:59:16
	20	Mr. Depp wrote Tasya van Pee; correct?	02:59:19
	21	MS. BREDEHOFT: Objection to the form of	02:59:24
	22	the question.	02:59:25

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

157

R	1	Go ahead.	02:59:26
	2	A. Correct.	02:59:26
	3	Q. And you respond on the next page, the	02:59:27
	4	second page of the exhibit, "Well done, my friend.	02:59:28
	5	Well done."	02:59:31
	6	Right?	02:59:32
	7	A. Yes.	02:59:33
	8	Q. And you follow up on February 24th,	02:59:33
	9	2014, which is Depp 12674 and say, quote, "The van	02:59:35
	10	Pee painting earned you 20 points in my book	02:59:43
	11	'cunado,'" unquote.	02:59:46
	12	Right?	02:59:49
	13	MS. BREDEHOFT: Objection to the form of	02:59:50
	14	the question.	02:59:51
	15	Go ahead.	02:59:52
	16	A. Correct.	02:59:52
	17	Q. And that was you complimenting your	02:59:53
	18	brother-in-law; true?	02:59:56
	19	MS. BREDEHOFT: Same objection.	02:59:57
	20	A. Yeah.	02:59:58
	21	MS. BREDEHOFT: Go ahead.	02:59:59
	22	A. Yes.	03:00:00

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

158

R	1	Q. Fair to say -- fair to say that you were	03:00:01
	2	amused that Mr. Depp wrote Tasya van Pee on the	03:00:02
	3	painting?	03:00:08
	4	MS. BREDEHOFT: Objection to the form of	03:00:08
	5	the question.	03:00:09
	6	Go ahead.	03:00:10
	7	A. Correct.	03:00:10
	8	Q. And on February 25, 2014, you write to	03:00:11
	9	Mr. Depp, quote, "She's the worst. Did Sis notice	03:00:14
	10	the van Pee yet," end quote?	03:00:18
	11	You wrote that; right?	03:00:20
	12	MS. BREDEHOFT: Objection. Objection to	03:00:21
	13	the form of the question.	03:00:22
	14	Go ahead.	03:00:24
	15	A. Correct.	03:00:24
	16	Q. And when you're referring jokingly to	03:00:25
	17	"She's the worst," you're talking about Ms. van	03:00:28
	18	Ree; true?	03:00:30
	19	A. Yes.	03:00:32
	20	MS. BREDEHOFT: Objection to the form of	03:00:33
	21	the question.	03:00:34
	22	Go ahead. Let me --	03:00:34

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

159

1 A. Sorry. 03:00:36

2 MS. BREDEHOFT: Sorry. 03:00:37

3 Yeah, Whitney, because the court 03:00:37

4 reporter can't get both of us at the same 03:00:38

5 time, just let me finish and then -- I'm 03:00:41

6 trying to be quick, but you got to let me 03:00:43

7 finish so you don't talk over me. 03:00:45

8 THE WITNESS: My apologies. 03:00:48

9 BY MR. CHEW: 03:00:49

R 10 Q. Why did you say that Ms. van Ree's the 03:00:49
11 worst? 03:00:52

12 MS. BREDEHOFT: Objection to the form of 03:00:53
13 the question. 03:00:53

14 Go ahead. 03:00:54

15 A. I don't like -- I don't care for 03:00:58
16 Ms. van Ree. 03:00:59

17 Q. And when you reference "Sis," that's 03:01:02
18 Amber; right? 03:01:05

19 A. Yes. 03:01:06

20 Q. Why don't you care for Ms. van Ree? 03:01:10

21 MS. BREDEHOFT: Objection to the form of 03:01:12
22 the question. 03:01:13

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

160

R	1	Go ahead.	03:01:14
	2	A. That is -- how do I answer this? I just	03:01:14
	3	don't -- she's not a person that I ever really got	03:01:25
	4	along with. I wasn't -- their relationship --	03:01:29
	5	Amber -- hers and Amber's relationship, I found	03:01:37
	6	her to be -- I found her to be manipulative,	03:01:40
	7	selfish. I just -- she was not a person that I --	03:01:43
	8	I got along with or cared for.	03:01:46
	9	Q. Did your sister break up with Tasya	03:01:50
	10	van Ree or did Tasya van Ree break up with her?	03:01:52
	11	MS. BREDEHOFT: Objection to the form of	03:01:57
	12	the question.	03:01:58
	13	Go ahead.	03:01:59
	14	A. You'd have to ask either one of them.	03:01:59
	15	I -- I wouldn't be able to recall who it was that	03:02:01
	16	called it off or why.	03:02:04
	17	Q. You never talked to your sister about	03:02:06
	18	it?	03:02:07
	19	MS. BREDEHOFT: Objection to the form of	03:02:08
	20	the question.	03:02:09
	21	Go ahead.	03:02:10
	22	A. I imagine I did. I just can't recall	03:02:11

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

161

1	who broke up with whom.	03:02:13
2	Q. I mean, weren't they married?	03:02:15
3	MS. BREDEHOFT: Objection to the form of	03:02:17
4	the question.	03:02:18
5	Go ahead.	03:02:19
6	A. I believe they were domestic partners.	03:02:21
7	Q. So you don't have any idea why they	03:02:23
8	broke up as domestic partners?	03:02:25
9	MS. BREDEHOFT: Objection to the form of	03:02:28
10	the question.	03:02:28
11	Go ahead.	03:02:29
12	A. Again, you would have to ask either one	03:02:30
13	of them for specifics or clarification, but my	03:02:34
14	understanding is that it was a pretty natural	03:02:39
15	progression of separation, if you will. They --	03:02:44
16	it seemed to be, at least from what I can recall,	03:02:49
17	a relationship that kind of outgrew itself. They	03:02:51
18	did maintain a friendship for some time after	03:02:55
19	that. I believe they're still friendly. But	03:02:57
20	again, I'm not -- I'm not sure as to the	03:03:01
21	specifics. I can't recall if there was a specific	03:03:04
22	reason or if it was just -- again, from my memory,	03:03:06

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

162

1	it was more of a natural progression of	03:03:09
2	separation.	03:03:13
3	Q. Okay. Well, let's go back to the last	03:03:13
4	page of Exhibit 6. After you say, "She's the	03:03:15
5	worst, did Sis notice the van Pee yet, question,"	03:03:21
6	and Johnny responds, "Oh, yes, triple exclamation	03:03:26
7	part -- triple exclamation points. She laughed	03:03:31
8	her ass off, triple exclamation points."	03:03:34
9	So Mr. Depp is saying that Amber thought	03:03:37
10	this was funny, too; correct?	03:03:40
11	MS. BREDEHOFT: Objection to the form of	03:03:43
12	the question.	03:03:43
13	Go ahead.	03:03:44
14	A. Correct.	03:03:45
15	Because again, as I stated before	03:03:45
16	earlier today, as well in the UK, this was a	03:03:47
17	different painting altogether than the one that	03:03:51
18	we've dubbed "The Painting Incident."	03:03:54
19	Q. Okay.	03:03:57
20	MR. CHEW: Let's move now to some texts	03:03:57
21	that -- Exhibit 7, if the technician would	03:04:04
22	please call this up.	03:04:07

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

163

1	REMOTE TECHNICIAN: Stand by.	03:04:09
2	(Exhibit 7 was marked for identification	03:04:09
3	and is attached to the transcript.)	03:04:09
4	MR. CHEW: It's only one page. It's	03:04:10
5	Depp 12670.	03:04:11
6	REMOTE TECHNICIAN: Showing Exhibit 7 on	03:04:23
7	the screen.	03:04:24
8	MS. BREDEHOFT: I'm sorry. Ben, can you	03:04:33
9	give me the -- the Bates stamp again? I'm --	03:04:34
10	MR. CHEW: Sure. It's Depp 12670.	03:04:37
11	MS. BREDEHOFT: Thank you very much.	03:04:40
12	MR. CHEW: You're welcome.	03:04:41
13	BY MR. CHEW:	03:04:42
14	Q. And this is a picture of a painting	03:04:42
15	that -- the picture you sent to Mr. Depp; correct?	03:04:46
16	MS. BREDEHOFT: Objection to the form of	03:04:50
17	the question.	03:04:51
18	Go ahead.	03:04:51
19	A. Yes.	03:04:52
20	Q. And this is another Tasya van Ree	03:04:59
21	painting; isn't it?	03:05:02
22	A. Correct.	03:05:04

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

164

R	1	That's the one that was hanging in the	03:05:04
	2	bedroom.	03:05:06
	3	Q. Is this the one that Mr. Depp allegedly	03:05:07
	4	tried to burn in March of 2013?	03:05:10
	5	MS. BREDEHOFT: Objection to the form of	03:05:14
	6	the question.	03:05:15
	7	Go ahead.	03:05:16
	8	A. Yes.	03:05:17
	9	Q. I can see why.	03:05:18
	10	Now, you write here, quote, "Good job,	03:05:20
	11	Hammer, exclamation point. This is the perfect	03:05:23
	12	place for the awful cherries/flamingos,	03:05:25
	13	exclamation point," unquote.	03:05:29
	14	Do you see that?	03:05:32
	15	MS. BREDEHOFT: Objection to the form of	03:05:33
	16	the question.	03:05:34
	17	Go ahead.	03:05:35
	18	A. Yeah. Yes.	03:05:35
	19	THE WITNESS: Sorry, Elaine.	03:05:36
	20	Q. Hammer is Mr. Depp; true?	03:05:38
	21	A. Yes.	03:05:40
	22	Q. Why are you telling him, "Good job"?	03:05:44

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

165

R	1	MS. BREDEHOFT: Objection to the form of	03:05:46
	2	the question.	03:05:47
	3	Go ahead.	03:05:48
	4	A. Because I didn't like her or that	03:05:51
	5	painting.	03:05:53
	6	Q. And then you write, "The only better	03:05:54
	7	place for it would be the incinerator, but we'll	03:05:56
	8	have to settle for this for now, I suppose,"	03:05:59
	9	unquote.	03:06:01
	10	Do you see that?	03:06:04
	11	MS. BREDEHOFT: Objection to the form of	03:06:05
	12	the question.	03:06:05
	13	Go ahead.	03:06:06
	14	A. Yes.	03:06:07
	15	Q. And you were referring to the -- to the	03:06:07
	16	picture that you sent; correct, the van Ree	03:06:09
	17	painting?	03:06:12
	18	MS. BREDEHOFT: Objection to the form of	03:06:13
	19	the question.	03:06:14
	20	Go ahead.	03:06:15
	21	A. Yes.	03:06:17
	22	Q. Okay. Now I'm going to turn,	03:06:17

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

166

1	Ms. Henriquez, to a more serious subject, and that	03:06:20
2	is the alleged incident that occurred in	03:06:22
3	Los Angeles in March 2015 at the ECB.	03:06:26
4	You have previously testified that	03:06:32
5	Ms. Heard came into your penthouse, quote, "crying	03:06:34
6	and screaming," unquote; is that correct?	03:06:38
R 7	MS. BREDEHOFT: Objection to the form of	03:06:40
8	the question, incorrect use of -- of former	03:06:41
9	testimony.	03:06:44
10	But go ahead.	03:06:45
11	A. March 2015. Are we referring to a	03:06:48
12	specific -- the staircase incident? Is that the	03:06:56
13	same date?	03:06:58
14	Q. Yes.	03:06:59
15	This is what you all refer to as the	03:06:59
16	stairs or the staircase incident in March of 2015	03:07:01
17	at ECB --	03:07:05
R 18	MS. BREDEHOFT: Objection.	03:07:06
19	Q. -- that you testified about in your	03:07:06
20	first witness statement at paragraph 58.	03:07:07
R 21	MS. BREDEHOFT: Objection to the form of	03:07:09
22	the question and the misuse of the witness	03:07:10

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

167

1 statement, and assumes facts not in evidence. 03:07:14

2 Go ahead. 03:07:17

3 A. So the original question was: On that 03:07:20

4 occasion, do I remember Amber coming into my 03:07:22

5 apartment upset? 03:07:24

6 Q. Well, actually, the words you used -- do 03:07:26

7 you remember her coming in, quote, "crying and 03:07:28

8 screaming," end quote? 03:07:31

R 9 MS. BREDEHOFT: Same objections, mis -- 03:07:33

10 misuse of -- can I have a continuing 03:07:35

11 objection whenever you -- 03:07:37

12 MR. CHEW: Yes. 03:07:39

13 MS. BREDEHOFT: -- use the witness 03:07:39

14 statement so that I don't have -- 03:07:40

15 MR. CHEW: Yes, you may. 03:07:41

16 MS. BREDEHOFT: -- have to -- 03:07:42

17 MR. CHEW: I am just trying to speed 03:07:43

18 this up. 03:07:45

19 MS. BREDEHOFT: Yeah. I'm trying to 03:07:45

20 help you. So thank you. 03:07:46

21 A. You're asking me if those are the words 03:07:49

22 I used? 03:07:50

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

168

1	Q.	Yes.	03:07:51
2	A.	Yes, if they're in my witness statement?	03:07:52
3	Q.	Yeah.	03:07:54
4		And if you want -- if you want to look	03:07:54
5		back on it, I'm fine. I'm just trying to be	03:07:56
6		quick. It's Exhibit --	03:07:59
7	A.	No, that's okay.	03:07:59
8	Q.	-- it's Exhibit 3, paragraph 58. And it	03:08:01
9		really -- you start talking about Los Angeles,	03:08:09
10		March '15, stairs incident, paragraphs 57, and	03:08:11
11		then you go onward. So I'm not -- I'm not trying	03:08:18
12		to trick you. I'm --	03:08:21
13	A.	No.	03:08:22
14	Q.	-- just trying to get your testimony.	03:08:23
15		MS. BREDEHOFT: Ben, if you could just	03:08:25
16		go a little bit further up from the 57,	03:08:26
17		because I think you might have -- and I'm	03:08:29
18		pretty sure it was an accident -- you said	03:08:32
19		2014, but if you go above 57 --	03:08:34
20		MR. CHEW: No, no. Well, then, I	03:08:37
21		misspoke. I meant 2015, so --	03:08:38
22		MS. BREDEHOFT: Yeah.	03:08:40

R

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

169

R	1	MR. CHEW: -- if I --	03:08:41
	2	MS. BREDEHOFT: I just wanted to make	03:08:41
	3	sure that was clear on the record.	03:08:42
	4	MR. CHEW: Yeah. This is definitely a	03:08:44
	5	March 2015 incident.	03:08:44
	6	BY MR. CHEW:	03:08:46
	7	Q. So there it is.	03:08:46
	8	A. Okay.	03:08:48
	9	Q. So you -- you previously testified at	03:08:49
	10	paragraph 58 that Ms. Heard came into your	03:08:53
	11	penthouse crying and screaming; is that correct?	03:08:55
	12	A. Yes.	03:08:58
F, H	13	Q. And, in fact, Ms. Heard had sparked that	03:09:02
R	14	argument with Mr. Depp because she had discovered	03:09:04
	15	that Johnny had been allegedly cheating on her;	03:09:07
	16	true?	03:09:10
	17	MS. BREDEHOFT: Objection to the form of	03:09:11
	18	the question.	03:09:11
	19	Go ahead.	03:09:13
	20	A. I have no way of knowing who,	03:09:15
	21	quote/unquote, started it or not. I don't know	03:09:18
	22	who sparked it. I do know that it -- it	03:09:21

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

170

F, H	1	absolutely had something to do with the fact that	03:09:26
R	2	she had found out that Johnny was cheating on her.	03:09:29
	3	Q. And you testified to that effect in	03:09:32
	4	paragraph 58; correct?	03:09:33
	5	MS. BREDEHOFT: Objection to the form of	03:09:36
	6	the question.	03:09:36
	7	Go ahead.	03:09:37
	8	A. Yes.	03:09:43
	9	Q. And you also testified that Ms. Heard	03:09:44
	10	woke you up and got you out of bed; true?	03:09:45
	11	MS. BREDEHOFT: Objection to the form of	03:09:49
R	12	the question.	03:09:49
	13	Go ahead.	03:09:50
	14	A. Yes.	03:09:51
	15	Q. You then went into penthouse 5 of the	03:09:55
	16	ECB; correct?	03:09:58
	17	MS. BREDEHOFT: Objection to the form of	03:10:01
R	18	the question.	03:10:03
	19	Go ahead.	03:10:04
	20	A. Correct. To go speak to Johnny.	03:10:04
	21	Q. Right. And then you referenced that in	03:10:07
	22	paragraph 59.	03:10:09

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

171

1	Where was Ms. Heard when you went into	03:10:10
2	penthouse 5 to speak with Johnny?	03:10:12
3	A. Initially she was in my apartment in	03:10:15
4	PH 4. I told her to stay there and to wait for me	03:10:23
5	while I went to go speak to him. So when I	03:10:26
6	initially made my way to PH 5, into the kitchen	03:10:32
7	where everyone was at the time, she was still in	03:10:35
8	PH 4, but then she at some point left PH 4 and	03:10:37
9	came down to the mezzanine level of PH 5.	03:10:43
10	Q. And where was Mr. Depp when you walked	03:10:46
11	into PH 5?	03:10:48
12	A. Initially in the kitchen with his	03:10:51
13	sobrie- -- I'm sorry.	03:10:56
14	Q. No. Please continue. I'm sorry. I	03:10:59
15	didn't mean to interrupt.	03:11:01
16	A. No.	03:11:02
17	He was at the kitchen island with one of	03:11:02
18	his security, Travis, and his -- his nurse,	03:11:04
19	Debbie.	03:11:09
20	Q. And that's -- when you say "Debbie,"	03:11:11
21	that's Debbie Lloyd; correct?	03:11:12
22	A. Yes, that is -- yeah, that's her last	03:11:16

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

172

1	name.	03:11:18
2	Q. And when you say "kitchen," the kitchen	03:11:18
3	was located downstairs, just in the layout; true?	03:11:20
4	A. Correct.	03:11:23
5	All -- all of the penthouses had the	03:11:24
6	kitchen and living space on the first floor, and	03:11:26
7	then a visible mezzanine level from the space that	03:11:29
8	was much shorter, and then a third level, which is	03:11:34
9	where the bedrooms were.	03:11:37
10	Q. And what was Ms. Lloyd doing when you	03:11:39
11	came in?	03:11:41
12	A. She was standing next to Johnny.	03:11:46
13	Q. What, if anything, did she say when she	03:11:49
14	saw you coming in and you were -- and she was	03:11:52
15	standing next to Johnny?	03:11:54
16	A. I don't recall her saying much of	03:11:56
17	anything. As I said before, I was just there to	03:12:01
18	talk to Johnny. And I would have -- that's -- I	03:12:06
19	don't recall her saying much of anything at all.	03:12:09
20	Q. And you said that Travis was there. Do	03:12:12
21	you remember Travis's last name?	03:12:14
22	A. I'm -- names are failing me today. I	03:12:16

R

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

173

R	1	apologize.	03:12:25
	2	Q. That's -- that's no problem.	03:12:26
	3	So there was Debbie Lloyd, there was	03:12:27
	4	Travis, there was Johnny. Was there anybody	03:12:30
	5	else --	03:12:32
	6	A. Uh-huh.	03:12:33
	7	Q. -- there?	03:12:33
	8	A. No.	03:12:34
	9	Q. Did -- did anybody else say anything at	03:12:34
	10	the time?	03:12:41
	11	A. No.	03:12:44
	12	From what I can recall, they were both	03:12:45
	13	relatively quiet when I was talking to Johnny. I	03:12:46
	14	don't recall them saying anything.	03:12:50
	15	Q. And you testified that Mr. Depp	03:12:52
	16	allegedly threw a can of Red Bull at you and	03:12:54
	17	Ms. Heard; correct?	03:12:57
	18	A. At some point, Amber -- like, as I	03:12:58
	19	mentioned before, Amber had come down from PH 4,	03:13:05
	20	from -- from my bedroom. She had crossed through	03:13:08
	21	the adjoining door and come down to the mezzanine	03:13:11
	22	level. And, you know, as I said, she was upset.	03:13:14

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

174

1 She was saying, "Stop." So I had gone up to the 03:13:17
2 mezzanine level. And I -- Debbie came with me. 03:13:20
3 And we were trying to console Amber and trying to 03:13:23
4 calm her down. She was screaming. He was 03:13:26
5 screaming. And it was at that point that Johnny 03:13:29
6 had hurled a Red Bull can. I don't know if he was 03:13:31
7 aiming for anybody specifically, but it did -- it 03:13:34
8 actually hit Debbie when we were standing on the 03:13:37
9 mezzanine level. I don't know who he was aiming 03:13:41
10 for. 03:13:44

11 Q. Where was Mr. Depp precisely, as best 03:13:44
12 you can remember, when he allegedly threw the can 03:13:47
13 of Red Bull? 03:13:50

R 14 MS. BREDEHOFT: Objection to the form of 03:13:53
15 the question. 03:13:54
16 Go ahead. 03:13:55

17 A. In the kitchen, around the island 03:13:55
18 with -- you know, Travis would have been near him. 03:13:59

19 Q. Which -- with which hand, left or right, 03:14:06
20 did Mr. Depp throw the can of Red Bull? 03:14:08

R 21 MS. BREDEHOFT: Objection to the form of 03:14:14
22 the question. 03:14:15

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

175

1	Go ahead.	03:14:17
2	A. I can't recall. I don't recall. Sorry.	03:14:17
3	Q. Where was Ms. Lloyd at the time he threw	03:14:20
4	the Red Bull?	03:14:24
5	MS. BREDEHOFT: Objection to the form of	03:14:27
6	the question.	03:14:28
7	Go ahead.	03:14:29
8	A. She was up on the mezzanine with Amber	03:14:30
9	and I.	03:14:32
10	Q. Where did the can of Red Bull hit	03:14:38
11	Ms. Lloyd?	03:14:41
12	A. If memory serves, it kind of hit her in	03:14:49
13	the back. I think she had her back towards the	03:14:52
14	kitchen area.	03:14:55
15	Q. So when it hit her in the back, where	03:14:56
16	were you and Amber physically in relation to	03:14:58
17	Ms. Lloyd?	03:15:01
18	A. I was at the top of the stairs with	03:15:06
19	Amber. She was closer -- she was further into the	03:15:08
20	mezzanine area. She also had a desk there. So I	03:15:12
21	believe she was closer to the desk. And at some	03:15:16
22	point, Debbie moved from the side that she was	03:15:18

R

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

176

1	on -- I think after -- after the Red Bull can hit	03:15:22
2	her, she moved to the other set of stairs so	03:15:25
3	that -- it's kind of hard to explain.	03:15:29
4	The stairs that went up like this, it	03:15:31
5	flattened out into the mezzanine level, and then	03:15:33
6	there was another set of stairs that led up to the	03:15:36
7	third floor. So she had moved from over -- from	03:15:38
8	her back overseeing the kitchen to the other side	03:15:41
9	of the staircase.	03:15:43
10	Q. At the time the Red Bull can hit	03:15:44
11	Ms. Lloyd in the back, how many feet away from	03:15:49
12	Ms. Lloyd were you?	03:15:53
13	A. I couldn't say. We were all very close.	03:15:55
14	It was a very small space at the top of the	03:16:01
15	stairs, so we would have been in arm's length of	03:16:04
16	one another.	03:16:08
17	Q. So your testimony is that you, Amber,	03:16:09
18	and Ms. Lloyd were within arm's length of each	03:16:10
19	other when Ms. Lloyd was hit with a can of Red	03:16:14
20	Bull.	03:16:17
21	Where in the back was Ms. Lloyd hit?	03:16:19
R 22	MS. BREDEHOFT: Objection to the form of	03:16:22

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

177

R	1	the question.	03:16:23
	2	Go ahead.	03:16:24
	3	A. Again, I -- and I -- I hesitate to even	03:16:25
	4	say it struck her in the back. I don't recall.	03:16:28
	5	But it did hit her. And I want to say it hit	03:16:31
	6	somewhere behind her. I didn't quite see where it	03:16:33
	7	hit her because of the angle. She was standing	03:16:37
	8	next to me. Her -- she was facing me, so her back	03:16:39
	9	was away from me. So I didn't see where it hit	03:16:44
	10	her. But I did see it strike her and I saw her	03:16:47
	11	kind of flinch after being hit by it.	03:16:51
	12	Q. That was my next question. How did	03:16:54
	13	Ms. Lloyd react when the can of Red Bull hit her?	03:16:56
	14	A. She weirdly didn't seem too phased. She	03:16:59
	15	just moved to the other side.	03:17:03
	16	Q. She didn't say anything?	03:17:05
	17	A. No.	03:17:08
	18	As I said, she was up there, we were	03:17:08
	19	just trying to calm the situation down. She	03:17:11
	20	was -- she was actually focused on Amber at that	03:17:14
	21	point, which is why I don't think she really	03:17:16
	22	reacted to the Red Bull can hitting her.	03:17:19

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

178

R, S, PK	1	Q. Was she injured, if you know?	03:17:22
	2	MS. BREDEHOFT: Objection to the form of	03:17:24
	3	the question.	03:17:24
	4	Go ahead.	03:17:25
	5	A. I don't know if she sustained any	03:17:26
R, S, PK	6	injuries after that.	03:17:28
	7	Q. Did she say "ouch" or anything to	03:17:29
	8	indicate that she had been struck with the Red	03:17:32
	9	Bull can?	03:17:35
	10	MS. BREDEHOFT: Objection to the form of	03:17:37
	11	the question.	03:17:37
	12	Go ahead.	03:17:38
	13	A. As I said, she flinched. She -- she	03:17:40
	14	kind of did one of these, like, oh, like it was	03:17:42
R, S, PK	15	clear that something impacted her, and I saw the	03:17:46
	16	Red Bull and -- the can fall next to her.	03:17:49
	17	Q. Did -- was the can of Red Bull open at	03:17:52
	18	the time that it allegedly hit Ms. Lloyd?	03:17:54
	19	MS. BREDEHOFT: I'm assuming so because	03:18:00
	20	Red Bull went out. So I'm assuming the can	03:18:01
	21	was open.	03:18:07
	22	Q. Do you know how full the can of Red Bull	03:18:07

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

179

1	was when Mr. Depp allegedly threw it at -- threw	03:18:11
2	it and it hit Ms. Lloyd?	03:18:14
3	MS. BREDEHOFT: Objection to the form of	03:18:17
4	the question.	03:18:18
5	Go ahead.	03:18:19
6	A. I don't.	03:18:22
7	Q. So -- and please correct me if I'm	03:18:23
8	mischaracterizing your testimony, but you -- you	03:18:27
9	then were trying to deescalate the situation; is	03:18:29
10	that true?	03:18:34
11	MS. BREDEHOFT: Objection to the form of	03:18:35
12	the question.	03:18:36
13	Go ahead.	03:18:37
14	A. I think that's correct. No. I'm sorry.	03:18:37
15	Q. Is that what you were doing, you were	03:18:41
16	trying to deescalate the situation?	03:18:43
17	MS. BREDEHOFT: Same objection.	03:18:45
18	Go ahead.	03:18:46
19	A. Yes.	03:18:46
20	Q. And did Ms. Heard calm down? Were your	03:18:49
21	efforts successful?	03:18:52
22	MS. BREDEHOFT: Objection to the form of	03:18:55

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

180

1 the question. 03:18:56

2 Go ahead. 03:18:57

3 A. Not -- not for awhile. It wasn't until 03:18:57

4 everyone had been separated and it wasn't until 03:19:05

5 much later. It was -- it was a very -- it was a 03:19:08

6 very intense ordeal. 03:19:13

7 Q. Okay. Let's try to keep it, you know, 03:19:14

8 step by step, in chronological order. 03:19:17

ICD,
SP

9 You've previously testified that while 03:19:21

10 your back was to the stairs facing Ms. Heard, 03:19:23

11 Mr. Depp was pulling you backwards. Am I correct? 03:19:26

12 MS. BREDEHOFT: Objection to the form of 03:19:29

13 the question. 03:19:30

14 Go ahead. 03:19:31

ICD,
SP

15 A. He was very -- he was very desperately 03:19:32

16 trying to get to Amber. So, yes, I was being 03:19:38

17 tugged back. 03:19:41

18 Q. As specifically as you can recall, how 03:19:43

19 was Mr. Depp pulling you backwards? 03:19:47

20 A. With his hands. I don't -- he was -- I 03:20:00

21 was blocking him and Amber. My back was to him. 03:20:02

22 And so I just felt getting pulled back. I wasn't 03:20:05

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

181

1	looking to see how I was being pulled back.	03:20:08
ICD, 2	Q. Could you tell whether Mr. Depp was	03:20:10
SP 3	using one hand or the other or both hands?	03:20:13
4	MS. BREDEHOFT: Objection to the form of	03:20:20
5	the question.	03:20:21
6	Go ahead.	03:20:22
7	A. I wasn't paying attention. I can't	03:20:22
8	recall.	03:20:23
ICD, 9	Q. As --	03:20:24
SP 10	A. I just felt it. I just felt it. I	03:20:25
11	don't know how else to describe it. I just felt	03:20:27
12	being pulled back. I wasn't looking to see which	03:20:29
13	hand was doing it.	03:20:33
14	Q. And next you testified that Mr. Depp,	03:20:34
15	quote, "Reached out to shove you out of the way to	03:20:35
16	lunge at Ms. Heard, reaching out to try to hit	03:20:39
17	Ms. Heard and instead struck you, hitting you --	03:20:43
18	hitting you in the arm," unquote.	03:20:46
19	Is that right?	03:20:49
20	MS. BREDEHOFT: Objection to the form of	03:20:50
21	the question.	03:20:50
22	Go ahead.	03:20:52

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

182

1	A.	Yes.	03:20:53
ICD, 2		As I mentioned before, he was	03:20:54
SP 3		desperately trying to get to Amber. And, again, I	03:20:56
4		don't think he was intentionally coming for me or	03:21:00
5		trying to strike me, but because I was right in	03:21:03
6		the middle of both of them, yes, I got struck.	03:21:05
7	Q.	And your back was to Mr. Depp; right?	03:21:09
8		I mean, that's what you were just	03:21:11
9		describing; true?	03:21:13
10	A.	Correct.	03:21:15
11	MS. BREDEHOFT:	Objection to the form of	03:21:16
12		the question.	03:21:17
13		Go ahead.	03:21:18
14	THE WITNESS:	I'm sorry.	03:21:19
15	Q.	In what direction did Mr. Depp shove	03:21:20
16		you?	03:21:22
ICD, 17	A.	He was just pulling -- he was pulling at	03:21:22
SP 18		me. And I think when he lunged forward -- he	03:21:29
19		lunged kind of forward to get Amber because Amber	03:21:31
20		was further in, so I would have gone forward.	03:21:35
21	Q.	So did he -- so he was pulling you back	03:21:37
22		and then is it your testimony that he managed to	03:21:39

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

183

ICD, SP	1	shove you forward?	03:21:44
	2	MS. BREDEHOFT: Objection.	03:21:47
	3	A. He was --	03:21:47
	4	MS. BREDEHOFT: Wait. Wait.	03:21:48
	5	Objection to the form of the question.	03:21:49
	6	Go ahead. Go ahead.	03:21:50
ICD, SP	7	A. Yes, because, as I described, he was	03:21:53
	8	trying to move up. He was trying to move closer	03:21:55
	9	to Amber.	03:21:58
	10	Q. How did Mr. Depp hit you in the arm?	03:22:02
	11	MS. BREDEHOFT: Objection to the form of	03:22:06
	12	the question.	03:22:06
	13	Go ahead.	03:22:07
ICD, SP	14	A. I don't understand. He just moved his	03:22:10
	15	arm and it struck me. I don't know what you mean	03:22:12
	16	by "how did he hit me."	03:22:14
	17	Q. Okay. And you don't know with which	03:22:16
	18	arm, right or left, he struck you?	03:22:18
	19	A. I -- I can't -- I can't recall.	03:22:26
ICD, SP	20	Q. Do you know what part of his arm hit	03:22:28
	21	you?	03:22:31
	22	A. No. It was mostly something I just	03:22:38

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

184

1	felt. I didn't see it, I just felt it mostly.	03:22:39
ICD 2	Q. Okay. So -- and where -- and where did	03:22:42
3	part of his arm impact you? Where on your body	03:22:45
4	did it impact you?	03:22:48
5	A. Like the -- the back of me, the back of	03:22:50
6	my arm maybe, like around here.	03:22:55
7	MS. BREDEHOFT: Let the record -- let's	03:23:00
8	just put that on the record because -- I know	03:23:01
9	we have a video, but let the record --	03:23:05
10	THE WITNESS: Oh, right.	03:23:06
11	MS. BREDEHOFT: -- reflect that she's	03:23:07
12	making gestures towards the top part of her	03:23:08
13	arm and shoulder on her right arm.	03:23:11
14	Would that be accurate, Ben?	03:23:13
15	MR. CHEW: I think you've described what	03:23:16
16	your client has -- has testified to	03:23:19
17	correctly.	03:23:22
18	MS. BREDEHOFT: Okay. Thank you. Thank	03:23:23
19	you.	03:23:23
20	BY MR. CHEW:	03:23:24
21	Q. You had previously testified that	03:23:29
22	Ms. Heard, your sister Amber, suddenly, quote,	03:23:31

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

185

1 "Lurched forward and hit Mr. Depp," unquote. 03:23:35

2 Correct? 03:23:40

R 3 MS. BREDEHOFT: Objection to the form of 03:23:40
4 the question. 03:23:41

5 Go ahead. 03:23:42

6 A. Yes. After he struck me. 03:23:44

7 Q. When he struck you, were you injured? 03:23:49

R 8 MS. BREDEHOFT: Objection to the form of 03:24:00
9 the question. 03:24:00

10 Go ahead. 03:24:01

11 A. I didn't sustain any serious injury, no. 03:24:01

12 Q. Did you sustain any injury? 03:24:04

R 13 MS. BREDEHOFT: Same objection. 03:24:07

14 Go ahead. 03:24:08

15 A. Not that I can recall it. Like I said, 03:24:10

16 it wasn't a relatively hard hit. It was -- again, 03:24:12

17 I don't think he was -- I think he was unsteady. 03:24:19

18 It didn't particularly hit me hard. 03:24:22

19 Q. And you don't even know whether he hit 03:24:25

20 you with a hand or it was just he impacted you 03:24:27

21 with part of his arm; true? 03:24:30

22 MS. BREDEHOFT: Objection to the form of 03:24:35

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

186

1	the question.	03:24:36
2	Go ahead.	03:24:36
ICD, UN 3	A. It was a hit. Whether or not it was	03:24:36
4	intended for me or what...	03:24:38
5	But it was definitely more than just a	03:24:40
6	push or a nudge.	03:24:42
7	Q. But you -- you don't know whether it was	03:24:43
8	with a hand or -- or another part of his arm;	03:24:45
9	correct?	03:24:47
10	MS. BREDEHOFT: Objection to the form of	03:24:48
11	the question.	03:24:49
12	Go ahead.	03:24:50
13	A. Correct.	03:24:53
14	Q. And you didn't seek medical treatment	03:24:53
15	after the alleged incident; true?	03:24:55
R 16	MS. BREDEHOFT: Objection to the form of	03:24:57
17	the question.	03:24:57
18	Go ahead.	03:24:58
19	A. I did not.	03:24:59
ICD, UN 20	Q. Okay. So now let's go back.	03:25:00
21	Okay. Amber lurched forward and hit Mr.	03:25:05
22	Depp. Did your sister punch Mr. Depp?	03:25:10

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

187

1 MS. BREDEHOFT: Objection to the form of 03:25:16
2 the question. 03:25:16
3 Go ahead. 03:25:18

4 A. No. It was -- it -- it was -- vaguely, 03:25:18
ICD, 5 or at least -- again, I didn't see the impact that 03:25:23
SP 6 Johnny had done to me, but it -- visually, it's 03:25:26
7 what I imagine the same kind of impact was. It 03:25:30
8 was more of a movement. It was more of just 03:25:32
9 emotion to just kind of -- it was a reaction. I 03:25:36
10 don't think she actually -- I didn't see her 03:25:40
11 actually impact a certain part of him because, 03:25:42
12 again, I was flinching and -- but, yeah, she -- it 03:25:48
13 was a very similar movement, at least what it felt 03:25:51
14 like, to what Johnny did to me. 03:25:54

15 Q. What hand did Ms. Heard use to hit 03:25:56
16 Mr. Depp? 03:25:59

17 MS. BREDEHOFT: Objection to the form of 03:26:00
18 the question. 03:26:01
19 Go ahead. 03:26:02

20 A. I can't recall what hand it was. 03:26:02

21 Q. Where did Ms. Heard hit Mr. Depp? 03:26:05

22 MS. BREDEHOFT: Objection to the form of 03:26:10

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

188

1	the question.	03:26:10
2	Go ahead.	03:26:11
3	A. As I just said, I didn't see where she	03:26:14
4	impacted him.	03:26:16
5	Q. How did Mr. Depp react to being hit by	03:26:18
ICD 6	Ms. Heard?	03:26:20
7	A. He then grabbed her with one hand,	03:26:20
8	grabbed her by the hair, and then started striking	03:26:29
9	her with the other hand in the head.	03:26:32
10	By that point, I had been pushed out of	03:26:34
11	the way and Travis was able to intervene, but	03:26:37
12	that's -- that was the next thing that I remember,	03:26:43
13	was him grabbing her by the hair and holding it as	03:26:46
14	he was striking her with the other hand.	03:26:48
15	Q. Okay. Now, I appreciate that, but we're	03:26:51
16	going to try to go back just a little bit and	03:26:53
17	unpack that.	03:26:55
18	You testified that you didn't exactly --	03:26:57
19	you didn't see exactly how Ms. Heard hit Mr. Depp,	03:27:02
20	but it didn't seem especially hard; right?	03:27:04
21	MS. BREDEHOFT: Objection to the form of	03:27:08
22	the question.	03:27:08

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

189

1	Go ahead.	03:27:11
2	A. Like I said, yes, I didn't see -- I	03:27:11
3	didn't see specifically where it was, but given	03:27:17
4	where she was, her angle, her distance from him, I	03:27:19
5	can't imagine she would have been able to land	03:27:24
6	something. I don't know, she might have.	03:27:27
7	Q. If you didn't actually see how Ms. Heard	03:27:29
8	hit Mr. Depp, how do you know that it wasn't	03:27:32
9	especially hard?	03:27:34
10	MS. BREDEHOFT: Objection to the form of	03:27:36
11	the question.	03:27:37
12	Go ahead.	03:27:38
13	A. It might -- to be clear, it might have	03:27:38
14	been. I just didn't -- I just didn't see it.	03:27:44
15	Q. Okay.	03:27:46
16	A. I didn't see if it was especially hard	03:27:46
17	or not. I can only imagine. Again, given where	03:27:48
18	she was on the stairs, her distance from him, I	03:27:52
19	don't know how she would have been able to hit him	03:27:54
20	especially hard.	03:27:57
21	Q. Okay.	03:27:58
22	A. She wasn't -- yeah.	03:28:00

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

190

1	(Samuel Moniz, Esq. entered the virtual	03:28:00
2	deposition room.)	03:28:00
3	MS. BREDEHOFT: Ben, before you --	03:28:01
4	before you go to the next question, I think	03:28:02
5	we need to indicate that Mr. Moniz has joined	03:28:04
6	us. He's now on the record.	03:28:07
7	MR. CHEW: Okay. So noted.	03:28:09
8	BY MR. CHEW:	03:28:10

9	Q. Now getting back to Mr. Depp's reaction.	03:28:10
ICD 10	I think you previously testified that Mr. Depp	03:28:13
11	grabbed Ms. Heard by the hair with one hand and he	03:28:15
12	punched her, quote, "really hard in the head with	03:28:18
13	his other hand multiple times," unquote.	03:28:21
14	Is that correct?	03:28:23

15	MS. BREDEHOFT: Objection to the form of	03:28:27
16	the question.	03:28:27
17	Go ahead.	03:28:28

18	A. Yes.	03:28:29
ICD 19	Q. With what hand did Mr. Depp grab	03:28:30
20	Ms. Heard by the hair?	03:28:33
21	A. I couldn't recall if it was right or	03:28:35
22	left. It was the hand that wasn't cased. He	03:28:42

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

191

ICD 1	was -- he was striking her with the hand that	03:28:47
2	wasn't in a cast. I -- I can't recall if that was	03:28:49
3	right or left.	03:28:53
4	Q. And with what hand did he punch	03:28:54
5	Ms. Heard in the head?	03:28:56
6	MS. BREDEHOFT: Objection to form.	03:28:59
7	Go ahead.	03:29:01
8	A. Again --	03:29:01
9	THE WITNESS: Sorry.	03:29:01
10	MS. BREDEHOFT: Go ahead. Go ahead.	03:29:02
ICD 11	A. Again, I can't recall if it was right or	03:29:05
12	left. It was -- it was the hand that had a cast	03:29:07
13	on it.	03:29:10
14	Q. So with one hand with a cast on it, he	03:29:10
15	was either grabbing her by the hair or hitting her	03:29:14
16	in the head, and with the other hand -- so --	03:29:19
17	so -- your testimony is that you don't know	03:29:22
18	whether his casted hand hit her in the head or	03:29:27
19	grabbed her by the hair, but it did one of those	03:29:30
20	things; correct?	03:29:33
21	MS. BREDEHOFT: Objection to the form of	03:29:34
22	the question.	03:29:35

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

192

1 Go ahead.

03:29:36

ICD 2 A. No. To be clear, no, that's not what I
3 was -- I was saying the hand that was not casted
4 was the one grabbing her by the hair and holding
5 it. The casted hand was the one that was making
6 impact. But I -- I don't -- I can't recall if it
7 was the right hand that was casted. I just
8 remember the cast hitting her head.

03:29:37

03:29:40

03:29:43

03:29:46

03:29:49

03:29:52

03:29:54

9 Q. And you -- and so you -- you do recall
10 that in March 2015, that it was Ms. -- Mr. Depp's
11 right hand that still had a cast on it because of
12 the injury he sustained in Australia; true?

03:29:57

03:29:59

03:30:03

03:30:06

13 MS. BREDEHOFT: Objection to the form of
14 the question.

03:30:09

03:30:10

15 Go ahead.

03:30:11

ICD 16 A. If you're telling me it was the right
17 hand, then, sure.
18 I'm just saying from my honest memory, I
19 don't -- I couldn't tell you if it was the right
20 hand or the left hand in the cast. I just
21 remember the cast making impact with his -- with
22 her head.

03:30:13

03:30:15

03:30:16

03:30:18

03:30:21

03:30:23

03:30:26

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

193

1	Q.	And you're aware that Mr. Depp had	03:30:27
ICD 2		severed the top of his finger in Australia; true?	03:30:30
3	MS. BREDEHOFT:	Objection to the form of	03:30:33
4		the question.	03:30:34
5		Go ahead.	03:30:34
6	A.	Yes.	03:30:35
ICD 7	Q.	And he had to have surgery on that	03:30:36
8		finger and had a pin put in that finger; true?	03:30:38
9	MS. BREDEHOFT:	Object to the form of	03:30:43
10		the question.	03:30:42
11		Go ahead.	03:30:43
12	A.	Yes.	03:30:45
ICD 13	Q.	So it's your testimony, sitting here	03:30:46
14		today, that Mr. Depp was hitting Ms. Heard with a	03:30:48
15		hand with a severely injured finger with a pin in	03:30:51
16		it?	03:30:55
17	MS. BREDEHOFT:	Objection to the form of	03:30:55
18		the question.	03:30:56
19		Go ahead.	03:30:57
20	A.	You mean the cast -- the hard casted	03:30:59
ICD 21		hand, the injured finger that he wrote on the	03:31:02
22		walls with, yes, that is the same hand.	03:31:07

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

194

1	Q.	Yeah, I wasn't asking you about the	03:31:10
2		finger on the hand. That was a nice addition.	03:31:12
ICD 3		I just want to get this kind of clear.	03:31:16
4		So it's your testimony that Mr. Depp was	03:31:19
5		hitting Ms. Heard with a hand with a severely	03:31:21
6		injured finger and a pin still in it?	03:31:25
7		That's your testimony?	03:31:27
8	A.	It is.	03:31:28
9		MS. BREDEHOFT: Objection to the form of	03:31:29
10		the question.	03:31:30
11		Go ahead.	03:31:31
12		THE WITNESS: All right.	03:31:31
13	A.	It is my testimony that despite being	03:31:32
ICD 14		very injured, he still used it to punch my sister	03:31:35
15		in the head repeatedly.	03:31:37
16	Q.	And you've previously testified that you	03:31:39
17		immediately took Ms. Heard back to your penthouse	03:31:41
18		to make sure she was okay; correct?	03:31:43
19		MS. BREDEHOFT: Objection to the form of	03:31:48
20		the question.	03:31:49
21		Go ahead.	03:31:50
ICD 22	A.	Correct.	03:31:50

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

195

1	At that point, I immediately separated	03:31:51
ICD, UN 2	her from the situation, put her in mine, and	03:31:54
3	locked the door behind me to make sure she was	03:31:57
4	safe.	03:31:59
5	Q. What injuries did Ms. Heard have at the	03:32:00
6	time?	03:32:02
7	MS. BREDEHOFT: Objection to the form of	03:32:03
8	the question.	03:32:03
9	Go ahead.	03:32:04
10	A. Injuries to her face and head from being	03:32:05
ICD, UN 11	repeatedly slammed with a hard cast, and also from	03:32:11
12	where hair had been pulled out from him grabbing	03:32:16
13	it.	03:32:21
14	Q. Okay. What -- what -- what did her face	03:32:22
15	look like?	03:32:23
16	What did you -- what did you observe	03:32:24
17	about her face that made you think she had	03:32:25
18	sustained any injuries?	03:32:29
19	A. Apart from seeing the hard cast impact	03:32:30
20	her face and head, she was also red, swollen.	03:32:36
21	It -- it appeared that she had actually been	03:32:39
22	impacted. You could see it. It was visible.	03:32:43

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

196

ICD, UN, IO, ET	1	Q.	So you saw redness and swelling. Did	03:32:46
	2		you see any bruising or any bleeding?	03:32:48
	3	MS. BREDEHOFT:	Objection to the form of	03:32:53
	4		the question.	03:32:53
	5		Go ahead.	03:32:54
	6	A.	Bruising, no. Bruising doesn't -- no.	03:32:54
ICD, UN, IO, ET	7		It doesn't happen immediately. But there was	03:32:58
	8		swelling. There was redness. Possibly scuffs,	03:33:00
	9		like scratches from the actual cast.	03:33:07
	10	Q.	Well, were there? Were there? You said	03:33:10
	11		"possibly." Did you see scratch marks or did you	03:33:13
	12		not see them?	03:33:16
	13	MS. BREDEHOFT:	Objection to the form of	03:33:17
	14		the question.	03:33:17
	15		Go ahead.	03:33:18
	16	A.	I -- I recall specifically seeing	03:33:21
ICD, UN, IO, ET	17		redness and -- and swelling. I didn't closely	03:33:23
	18		examine her. But if my memory serves, I remember	03:33:27
	19		that it -- the injury to her was visible.	03:33:32
	20	Q.	So --	03:33:36
	21	A.	It was more visible -- it was more	03:33:37
	22		visible in the coming days, in the days after, but	03:33:38

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

197

ICD,1
UN,
IO, 2
ET

at the time, it was just very red, irritated,
swollen.

03:33:42

03:33:46

3 Q. What -- what about -- putting aside her
4 face, have you fully described everything that you
5 remember seeing about her -- the injuries to her
6 face at the time?

03:33:48

03:33:50

03:33:52

03:33:55

7 MS. BREDEHOFT: Objection to the form of
8 the question.

03:33:56

03:33:56

9 Go ahead.

03:33:58

10 A. That night specifically?

03:33:58

11 Q. Right at that time. And then I'm going
12 to ask you about the rest of her head. But I just
13 want to get all -- all your testimony, all your
14 recollection about what you saw on her face.

03:34:04

03:34:05

03:34:08

03:34:10

15 Have you described for us everything
16 that you recall at the time, not later?

03:34:14

03:34:16

17 MS. BREDEHOFT: Objection to the form of
18 the question.

03:34:19

03:34:20

19 Go ahead.

03:34:21

20 A. To the best of my recollection, yes.

03:34:22

21 Q. Did -- were there any -- other than her
22 face and head, did you witness any injuries to her

03:34:24

03:34:26

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

198

1	body that night, the rest of her body?	03:34:30
2	A. Not that I can recall.	03:34:37
3	Q. Did you -- you said something about --	03:34:39
4	well, you said something about injuries to her	03:34:42
5	head, not including --	03:34:44
6	A. The --	03:34:46
7	Q. -- describing --	03:34:46
8	A. Correct.	03:34:48
9	Sorry. I'll let you -- I'll let you	03:34:49
10	finish.	03:34:51
11	Q. No. No.	03:34:52
12	Just -- would you please describe for us	03:34:53
13	what, if any, injuries you observed on her head as	03:34:54
14	opposed to her face.	03:34:57
15	MS. BREDEHOFT: Objection to the form of	03:35:00
16	the question.	03:35:00
17	Go ahead.	03:35:01
18	A. So I didn't closely examine her, but	03:35:05
19	where her hair had been pulled and held, it was	03:35:08
20	just raised. It was like -- it was just	03:35:11
21	disheveled. I didn't examine it for injuries.	03:35:15
22	Q. Okay.	03:35:18

ICD,
UN

ICD,
UN

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

199

1	A.	But it was -- it -- her injuries were	03:35:18
ICD, 2		very consistent with what I had just witnessed.	03:35:21
UN, 3	Q.	Did Ms. Lloyd, Nurse Lloyd, make any	03:35:24
IO, 4		attempt to examine Ms. Heard after witnessing what	03:35:27
ET 5		had happened with Mr. Depp?	03:35:30
6	MS. BREDEHOFT:	Objection to the form of	03:35:32
7		the question.	03:35:33
8		Go ahead.	03:35:34
ICD, 9	A.	No, she did not. Her and Travis left	03:35:35
UN, 10		with Johnny.	03:35:38
IO, 11	Q.	Okay.	03:35:41
ET 12	MR. CHEW:	If you could please show the	03:35:42
13		witness what has been marked as Exhibit 8.	03:35:43
14		And I'll just state for Ms. Bredehoft's	03:35:50
15		benefit, these are documents that were	03:35:52
16		produced by her client WH 106 to 109.	03:35:53
17	REMOTE TECHNICIAN:	Stand by.	03:36:00
18		(Exhibit 8 was marked for identification	03:36:00
19		and is attached to the transcript.)	03:36:00
20	THE VIDEOGRAPHER:	Mr. Chew, while you	03:36:01
21		do that, would you mind if we take a quick	03:36:02
22		break so I can start a new video?	03:36:05

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

200

1	MR. CHEW: Yeah. Why don't we take a	03:36:08
2	ten-minute break.	03:36:09
3	And what is our running time?	03:36:10
4	REMOTE TECHNICIAN: 2:50.	03:36:13
5	MR. CHEW: 2:50. Great. Okay.	03:36:15
6	THE VIDEOGRAPHER: Thank you. We are	03:36:17
7	off the record at 3:36.	03:36:18
8	(Recess in proceedings.)	03:48:46
9	THE VIDEOGRAPHER: We're back on the	03:49:45
10	record at 3:49.	03:49:46
11	BY MR. CHEW:	03:49:48
12	Q. Okay. Great.	03:49:48
13	You have before you Exhibit 8. These	03:49:50
14	are text messages that you have produced between	03:49:54
15	yourself and Nurse Erin Boerum; correct?	03:49:58
16	A. May I please have control to make it	03:50:06
17	larger? I can't see the text.	03:50:09
18	Q. Absolutely.	03:50:11
19	REMOTE TECHNICIAN: Now you have	03:50:12
20	control.	03:50:13
21	Q. Let's start on the first page.	03:50:13
22	A. Yes.	03:50:18

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

201

1	MS. BREDEHOFT: Ben, were these the WH	03:50:19
2	106 to 109? I'm sorry.	03:50:21
3	MR. CHEW: Correct.	03:50:24
4	MS. BREDEHOFT: Okay. Thank you.	03:50:24
5	BY MR. CHEW:	03:50:24
6	Q. And who is reflected in the green box to	03:50:25
7	the right with the contact name Erin Nurse?	03:50:27
8	A. Erin Boerum, the -- Amber's nurse at the	03:50:31
9	time.	03:50:35
10	Q. And is Amber -- Erin Boerum your nurse	03:50:35
11	as well?	03:50:39
12	MS. BREDEHOFT: Objection to the form of	03:50:40
13	the question.	03:50:41
14	A. No.	03:50:42
15	THE WITNESS: I'm sorry.	03:50:44
16	A. No.	03:50:44
17	Q. Why did you have Erin Boerum's phone	03:50:45
18	number?	03:50:48
19	A. In case I needed to get ahold of her for	03:50:49
20	any reason. She traveled with Amber. And Amber	03:50:56
21	almost never had her phone with her or on her. So	03:51:02
22	anybody that was around Amber, I just made it a	03:51:06

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

202

1	point to get their contact information just so I	03:51:09
2	could stay in contact.	03:51:11
3	Q. And the date of these messages on the	03:51:13
4	first page is March 23rd, 2015; correct?	03:51:15
5	A. Correct.	03:51:21
6	Q. And she's reaching out to you to check	03:51:22
7	on Amber; right?	03:51:24
R 8	MS. BREDEHOFT: Objection to the form of	03:51:26
9	the question.	03:51:27
10	Go ahead.	03:51:28
11	A. Yes.	03:51:29
12	Q. And specifically, she says, "Thank	03:51:31
13	goodness. She must be exhausted. Do you want me	03:51:34
14	to come to the loft or is she safe and sound	03:51:36
15	asleep?"	03:51:39
16	And you respond, "Safe? No. She's not.	03:51:39
17	Kept saying she wants to kill herself. I took her	03:51:42
18	meds and hid them," unquote.	03:51:45
19	Did I read that correctly?	03:51:47
R 20	MS. BREDEHOFT: Objection to the form of	03:51:49
21	the question.	03:51:49
22	Go ahead.	03:51:51

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

203

1	A.	I'm scrolling down to the last bit of	03:51:51
2		the message because it cut off.	03:51:53
3		"Safe? No. She" -- yes. "She kept	03:51:56
4		saying she wants to kill... I took her meds and	03:51:58
5		hid them."	03:52:01
6		Yes, I see that.	03:52:02
7	Q.	What meds were you trying to hide from	03:52:03
8		Ms. Heard?	03:52:06
9	MS. BREDEHOFT:	Objection to the form of	03:52:07
10		the question.	03:52:08
11		Go ahead.	03:52:10
12	A.	Part of both Erin and Debbie's function	03:52:10
13		in their life is they carried around medicine, and	03:52:16
14		administered medication for them. They had, like,	03:52:19
15		daily, like, pill packs, if you will. And they	03:52:21
16		were meant to take pills at certain times, you	03:52:24
17		know, whatever -- all prescription medication.	03:52:26
18		So the meds that I'm referring to would	03:52:31
19		have been her little daily allotment that was	03:52:36
20		prescribed by Dr. Kipper.	03:52:40
21	Q.	But why were you trying to hide those	03:52:42
22		meds from Amber?	03:52:45

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

204

1	MS. BREDEHOFT: Same objection.	03:52:47
2	Go ahead.	03:52:51
UN, SP, VA, H, FSPK	3 A. In all of my life, in my relationship 4 with Amber, I've never, ever known her to threaten 5 or talk about killing herself or anything even 6 remotely resembling that. And I remember after 7 this ordeal, and she was so upset -- I had never 8 heard her say that before, and I was -- I was 9 scared. It was my own panic and not knowing what 10 to do with the situation because, again, I had 11 never heard her say these things before. I had 12 never known her to have any version of these 13 thoughts. So I was -- I was just scared. I hid 14 everything that I thought could hurt --	03:52:51 03:52:53 03:52:56 03:53:01 03:53:05 03:53:08 03:53:11 03:53:15 03:53:17 03:53:19 03:53:22 03:53:24
15	MR. CHEW: I would move -- I would move	03:53:29
16	to strike all of that as non-responsive.	03:53:30
UN, SP, VA, H, FSPK	17 Q. All I asked you was: What meds were you 18 trying to hide from your sister?	03:53:33 03:53:37
19	MS. BREDEHOFT: Objection to the form of	03:53:39
20	the question, asked and answered.	03:53:39
21	Go ahead.	03:53:41
UN, SP, VA, H, FSPK	22 A. I believe you asked me why I hid them.	03:53:41

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

205

R, 1
ICD

Q. No, I didn't. That's not what I asked.

03:53:44

2 I asked you: What meds were you trying
3 to hide from Ms. Heard.

03:53:46

03:53:49

4 A. My apologies. I --

03:53:51

5 MS. BREDEHOFT: Excuse me. Objection to
6 the question -- the form of the question and
7 the --

03:53:53

03:53:54

03:53:55

8 Q. Just answer the question. There's no
9 objection.

03:53:55

03:53:57

10 MS. BREDEHOFT: Objection to the form of
11 the question and the interruption.

03:53:58

03:53:58

12 Go ahead.

03:54:01

13 A. The meds I'm referring to in this
14 message would have been her daily allotment of
15 prescription.

03:54:03

03:54:05

03:54:10

16 Q. What was Ms. Heard saying to you to make
17 you think that she was going to kill herself?

03:54:10

03:54:12

R

18 MS. BREDEHOFT: Objection to the form of
19 the question.

03:54:15

03:54:16

20 Go ahead.

03:54:17

21 A. As I -- I just said, and what I said
22 here, she was really upset and saying that she

03:54:19

03:54:21

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

206

1	wanted to kill herself. And, again, because I had	03:54:25
2	never heard her say anything like that before and	03:54:28
3	it -- it scared me.	03:54:31
4	Q. Was there anyone else with you --	03:54:33
ICD, 5	A. And --	03:54:36
UN, 6	Q. -- at the time?	03:54:36
FSPK		
7	MS. BREDEHOFT: Objection to the	03:54:38
8	interruption.	03:54:39
9	Were you finished answering the	03:54:39
10	question?	03:54:41
11	THE WITNESS: No.	03:54:43
12	A. I was -- I was just explaining why --	03:54:43
ICD, 13	when she said that, why I -- why I took her meds	03:54:44
UN, 14	and I hid them, because I was scared. I had never	03:54:51
FSPK		
15	heard her say that and I just was scared that she	03:54:53
16	was going to do something with them.	03:54:56
17	No -- but to answer your other question,	03:54:58
18	then, no, nobody else was at the loft with us.	03:54:59
19	Q. Was March 13th -- March 23, 2000 [sic],	03:55:04
20	the first time you had ever heard of Ms. Heard	03:55:08
21	speaking of harming herself?	03:55:10
22	MS. BREDEHOFT: Objection to the form of	03:55:14

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

207

1 the question. 03:55:15

2 Go ahead. 03:55:16

ICD, 3 A. As I just said, yes. That's the first 03:55:16
FSPK, 4 time I had ever heard her say anything like that, 03:55:18
SP 5 or since. 03:55:20

6 Q. Have you ever heard Ms. Heard tell you, 03:55:26
7 in words or substance, that she wanted to kill 03:55:28
8 herself after the date of these text messages on 03:55:31
9 March 23rd, 2015? 03:55:33

10 MS. BREDEHOFT: Objection to the form of 03:55:38
11 the question. 03:55:39

12 Go ahead. 03:55:40

ICD, 13 A. No. 03:55:40
FSPK, 14 Q. Was Amber under the influence of any 03:55:45
SP 15 drugs or alcohol on March 23rd, 2015, as far as 03:55:47
16 you know? 03:55:50

17 A. To my knowledge, no. I didn't see her 03:55:54
18 consume anything or take anything. 03:55:56

19 Q. Were you with her all day that day on 03:55:58
20 March 23rd? 03:56:00

21 MS. BREDEHOFT: Objection to the form of 03:56:02
22 the question. 03:56:02

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

208

1	Go ahead.	03:56:03
2	A. No, I was not.	03:56:04
3	Q. What time --	03:56:08
4	A. As I had --	03:56:09
5	Q. Go ahead.	03:56:10
6	A. As I mentioned, I was -- I was woken up.	03:56:10
7	I was asleep. I wasn't with them.	03:56:15
8	Q. Was anyone else at the ECB on March	03:56:17
9	23rd?	03:56:19
10	MS. BREDEHOFT: Objection to the form of	03:56:20
11	the question.	03:56:20
12	Go ahead.	03:56:21
13	A. Apart from Debbie Lloyd, Travis, who I	03:56:23
14	mentioned before -- Rocky Pennington and Josh Drew	03:56:27
15	were still living in the other loft. Isaac was	03:56:34
16	living in the other loft. But nobody was in	03:56:37
17	either PH 3, 4 or 5.	03:56:43
18	Q. Okay. If you look at the next page, on	03:56:45
ICD, SP 19	WH 107, you tell Erin Boerum that you were, quote,	03:56:47
20	"trying to fix some of the things he broke."	03:56:52
21	Do you see that?	03:56:55
22	A. Yes.	03:56:56

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

209

1	Q.	And the "he" is Johnny Depp; is that	03:57:01
ICD, 2		correct?	03:57:03
SP, 3	A.	Yes.	03:57:05
H 4	Q.	Did you see Johnny Depp on March 23rd,	03:57:06
5		2015?	03:57:09
6	MS. BREDEHOFT:	Objection to the form of	03:57:11
7		the question.	03:57:12
8		Go ahead.	03:57:12
9	A.	The -- the day before was the stair --	03:57:13
10		if memory serves, the staircase incident. I don't	03:57:22
ICD, 11		know when these messages -- let's see. 4:23.	03:57:25
SP, 12		That would have been -- I think that's the next	03:57:29
H 13		day, if I'm not mistaken.	03:57:32
14	Q.	Yes, it is the next day, that day, March	03:57:34
15		23.	03:57:36
16	A.	I didn't see him that day.	03:57:37
17	MS. BREDEHOFT:	Oh, I'm sorry. I'm	03:57:39
18		sorry.	03:57:39
19		Objection to the form of the question.	03:57:40
20	THE WITNESS:	I'm sorry.	03:57:41
21	MS. BREDEHOFT:	Go ahead. Go ahead.	03:57:42
ICD, 22	A.	The -- when the ordeal took place, I	03:57:44
SP, 22			
H			

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

210

1	don't know if it was technically after midnight or	03:57:47
ICD, 2	whatever, but I -- after -- after the ordeal,	03:57:49
FSPK, 3	after I heard him smashing everything in the other	03:57:54
SP 4	apartment, I did not see him after that.	03:57:56
5	Q. Did you see Mr. Depp break anything on	03:57:59
6	March 23, 2015?	03:58:01
7	MS. BREDEHOFT: Objection to the form of	03:58:04
8	the question.	03:58:04
9	Go ahead.	03:58:05
10	A. After I got Amber into my apartment, I	03:58:08
ICD, 11	heard him smashing things. I heard him and I	03:58:10
FSPK, 12	heard his voice. I heard him -- I heard things	03:58:13
SP 13	crashing as he's screaming obscenities, saying, I	03:58:16
14	hate you, you fuck -- you effing C-word, this,	03:58:19
15	that, and the other. I heard him crashing	03:58:24
16	everything in the adjoining loft.	03:58:26
17	Q. Did you see him break anything?	03:58:28
18	MS. BREDEHOFT: Objection to the form of	03:58:29
19	the question.	03:58:30
20	Go ahead.	03:58:31
ICD, 21	A. No.	03:58:31
FSPK, 22	As I said before, I locked the door	03:58:32
SP		

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

211

1 behind me. I only heard it.

03:58:34

ICD,
FSPK,
SP

2 Q. And what was broken, if you know, if you
3 saw anything?

03:58:35

03:58:37

4 MS. BREDEHOFT: Objection to the form of
5 the question.

03:58:38

03:58:39

6 Go ahead.

03:58:40

ICD,
FSPK,
SP

7 A. A bunch of clothing racks, a couple of
8 pieces of artwork were damaged, holes in the wall,
9 broken dishes in the kitchen. You know, trash,
10 like, you know, cans of Red Bull and what have
11 you. But basically, all of the -- all of the --
12 almost, if not all of the clothing racks and shoe
13 racks that were in those rooms were knocked down
14 and destroyed and broke.

03:58:41

03:58:45

03:58:50

03:58:55

03:59:00

03:59:03

03:59:06

03:59:09

15 Q. Did Ms. Heard have any visible bruises
16 or marks?

03:59:13

03:59:16

17 MS. BREDEHOFT: Objection to the form of
18 the question.

03:59:17

03:59:18

19 Go ahead.

03:59:19

20 A. The following day?

03:59:20

21 Q. When you saw her on March 23rd.

03:59:22

22 MS. BREDEHOFT: Objection to the form of

03:59:27

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

212

1	the question.	03:59:27
2	Go ahead.	03:59:28
3	A. Again, I can't recall specifically	03:59:31
4	examining her.	03:59:32
5	Q. Did Erin Boerum come to the ECB on the	03:59:35
6	evening of March 23rd, 2015?	03:59:39
7	MS. BREDEHOFT: Objection to the form of	03:59:41
8	the question.	03:59:42
9	Go ahead.	03:59:43
10	A. Let me see. I'm just -- I'm jumping in	03:59:43
11	the shower and then heading over. I don't recall.	03:59:49
12	I mean, she -- her message indicates that she made	03:59:55
13	it out there, but I don't recall if she actually	03:59:58
14	made it to us or not.	04:00:00
15	Q. What, if anything, did Ms. Boerum tell	04:00:02
16	you that evening?	04:00:05
17	A. I honestly don't recall the conversation	04:00:06
18	that I had with her about it.	04:00:11
19	Q. Okay. Let's move to another subject.	04:00:13
20	Who is Jennifer Howell?	04:00:17
ICD 21	A. Jennifer Howell was my boss at the Art	04:00:20
22	of Elysium, as well as she was a friend.	04:00:24

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

213

1	Q. Did your sister also form a friendship	04:00:28
2	with Jennifer Howell?	04:00:31
3	MS. BREDEHOFT: Objection to the form of	04:00:33
4	the question.	04:00:33
5	Go ahead.	04:00:34
6	A. Yes.	04:00:37
7	Q. And isn't it true that Ms. Howell wrote	04:00:38
8	a letter in support of Amber when she was in	04:00:40
9	trouble with the Australian authorities about the	04:00:43
10	dogs?	04:00:45
11	MS. BREDEHOFT: Objection to the form of	04:00:47
12	the question.	04:00:48
13	Go ahead.	04:00:49
14	A. From my recollection, yes, she -- she	04:00:51
15	did.	04:00:52
16	Q. Did you and Ms. Howell refer to each	04:00:53
17	other as, quote, "chosen sisters," end quote?	04:00:56
18	MS. BREDEHOFT: Objection to the form of	04:01:00
19	the question.	04:01:01
20	Go ahead.	04:01:02
21	A. Yes.	04:01:04
22	Q. And didn't you move in with Jennifer	04:01:04

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

214

1	Howell at some point?	04:01:06
2	MS. BREDEHOFT: Objection to the form of	04:01:08
3	the question.	04:01:09
4	Go -- go ahead.	04:01:10
5	A. Yes. She was kind enough to take me in.	04:01:11
6	Q. And isn't it true that you told	04:01:14
7	Ms. Howell that you were moving in with her	04:01:15
8	because you were, quote, "terrified of Amber," end	04:01:17
9	quote?	04:01:20
10	MS. BREDEHOFT: Objection to the form of	04:01:21
11	the question.	04:01:21
12	Go ahead.	04:01:23
13	A. I never said I was terrified of Amber.	04:01:24
14	Q. You said you were scared of her?	04:01:27
15	MS. BREDEHOFT: Objection to the form of	04:01:29
16	the question.	04:01:29
17	A. No. I never said that.	04:01:31
18	Q. Did you ever tell Jennifer Howell that	04:01:33
ICD 19	it was Amber who tried to push Johnny down the	04:01:36
20	stairs?	04:01:39
21	MS. BREDEHOFT: Objection to the form of	04:01:40
22	the question.	04:01:40

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

215

1 Go ahead. 04:01:41

2 A. No. I never said that. 04:01:43

ICD 3 Q. Did you ever tell -- 04:01:45

4 A. Not true. 04:01:46

5 Q. Did you ever tell Jennifer Howell that 04:01:48

6 you tried to stop your sister Amber from striking 04:01:50

7 and hitting Johnny on the stairs? 04:01:53

8 MS. BREDEHOFT: Objection to the form of 04:01:55

9 the question. 04:01:56

10 Go ahead. 04:01:57

11 A. I never said that to her. 04:01:57

ICD 12 Q. Didn't you tell Jennifer Howell that 04:01:59

13 Amber nearly pushed you down the stairs that 04:02:00

14 evening? 04:02:03

15 MS. BREDEHOFT: Objection to the form of 04:02:03

16 the question. 04:02:04

17 Go ahead. 04:02:05

18 A. No. 04:02:07

ICD 19 Q. Did you tell Jennifer Howell that you 04:02:09

20 were trying to protect Johnny? 04:02:10

21 MS. BREDEHOFT: Objection to the form of 04:02:14

22 the question. 04:02:15

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

216

1	Go ahead.	04:02:16
2	A. No.	04:02:17
ICD 3	Q. Didn't you tell Jennifer Howell that you	04:02:18
4	were worried that, quote, "Amber was going to kill	04:02:20
5	Johnny," end quote?	04:02:23
6	MS. BREDEHOFT: Objection to the form of	04:02:24
7	the question.	04:02:25
8	Go ahead.	04:02:26
9	A. No.	04:02:28
ICD 10	Q. Didn't you tell Jennifer Howell that you	04:02:29
11	endured, quote, "that kind of abuse your entire	04:02:31
12	life, first from your father and then from Amber,"	04:02:34
13	unquote?	04:02:37
14	MS. BREDEHOFT: Objection to the form of	04:02:39
15	the question.	04:02:40
16	Go ahead.	04:02:41
17	A. I never said I suffered any violence at	04:02:42
ICD 18	the hands of Amber. We did talk about my father,	04:02:44
19	but I never said I was subjected to any violence	04:02:49
20	because of Amber.	04:02:53
21	Q. So --	04:02:56
ICD 22	A. I never said that.	04:02:56

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

217

1	Q. So Jennifer's -- so Ms. Howell's just	04:02:57
ICD 2	making all these things up; is that your	04:03:00
3	testimony?	04:03:02
4	MS. BREDEHOFT: Objection to the form of	04:03:03
5	the question.	04:03:03
6	Go ahead.	04:03:04
7	A. I honestly don't know why she's saying	04:03:04
ICD 8	the things that she's saying. I can only speak to	04:03:07
9	what I've told her in the past. I can't -- I	04:03:10
10	can't speculate as to why she's saying what she's	04:03:13
11	saying now.	04:03:16
12	Q. Didn't you tell Ms. Howell that your	04:03:17
13	sister Amber was extremely violent?	04:03:21
14	MS. BREDEHOFT: Objection to the form of	04:03:24
15	the question.	04:03:25
16	Go ahead.	04:03:26
17	A. I've never said that.	04:03:28
ICD 18	Q. Let's move to the infamous 30th birthday	04:03:30
19	party in April of 2016.	04:03:35
20	Do you recall attending Amber's birthday	04:03:39
21	party that year?	04:03:42
22	A. Yes, I did.	04:03:46

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

218

ICD

1	Q. In your witness statement, you write	04:03:47
2	that you left soon after Mr. Depp arrived because	04:03:49
3	you were pregnant and feeling sick; is that	04:03:51
4	correct?	04:03:53
5	A. That is correct.	04:03:55
6	MS. BREDEHOFT: Objection to the form.	04:03:56
7	Hold on.	04:03:57
8	Objection to the form of the question.	04:03:58
9	And can I have another continuing	04:03:59
10	objection on --	04:04:01
11	MR. CHEW: Yes.	04:04:02
12	MS. BREDEHOFT: -- for the witness	04:04:02
13	statement, that it is improper?	04:04:03
14	Thank you.	04:04:05
15	MR. CHEW: Yes.	04:04:05
16	MS. BREDEHOFT: Thank you.	04:04:06
17	BY MR. CHEW:	04:04:06
18	Q. Is that right?	04:04:09
19	A. That I left because I was pregnant and	04:04:11
20	not feeling well?	04:04:13
21	Q. Yes.	04:04:14
22	A. That is correct.	04:04:15

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

219

1 Q. And you've also testified that you went 04:04:16
ICD 2 to Coachella with Amber the next day, on April 22, 04:04:18
3 2016, where Amber told you the events from the day 04:04:21
4 before while on the way to Coachella; true? 04:04:27

5 MS. BREDEHOFT: Objection to the form of 04:04:30
6 the question. 04:04:30
7 Go ahead. 04:04:32

8 A. Yes, we discussed it. 04:04:33
ICD 9 Q. Where did you meet up with Amber that 04:04:35
10 day to go to Coachella? 04:04:37
11 A. To the best of my knowledge, I would 04:04:45
12 have met her at the ECB building. 04:04:46
13 Q. Did you actually go up to the penthouses 04:04:49
14 that morning? 04:04:52

15 MS. BREDEHOFT: Objection to the form of 04:04:52
16 the question. 04:04:53

17 A. I imagine -- 04:04:54

18 MS. BREDEHOFT: Go ahead. 04:04:55

ICD 19 A. I imagine I would have. 04:04:55

20 Q. Who was there when you arrived and saw 04:04:57
21 Amber when you went upstairs? 04:05:00

22 MS. BREDEHOFT: Objection to the form of 04:05:05

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

220

1	the question.	04:05:06
2	Go ahead.	04:05:07
3	A. I can't recall who might have been in	04:05:08
4	PH 3 or PH 5, but as I mentioned before, Rocky was	04:05:12
5	still living there in a separate loft, as was	04:05:18
6	Isaac. But in terms of -- if they were together	04:05:22
7	or not, I can't -- I honestly can't recall.	04:05:25
8	Q. And Rocky is Rocky Pennington and Isaac	04:05:28
9	is Isaac Baruch; correct?	04:05:32
10	A. That is correct.	04:05:35
11	Q. And did Amber tell you, in words or	04:05:35
12	substance, that Mr. Depp had hit her the night	04:05:37
13	before?	04:05:40
14	A. She didn't go into detail around that	04:05:45
15	time. I'm just told it was another -- it was	04:05:47
16	another nasty brawl.	04:05:49
17	Q. What, if any, bruises, swelling or marks	04:05:53
18	did you observe, if any, on Amber on April 22,	04:05:57
19	2016?	04:06:01
20	A. I don't recall seeing anything.	04:06:04
21	Q. I'm going to show you a document from	04:06:08
22	your production bearing Bates stamp WH 49, and	04:06:11

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

221

1	will be marked as Exhibit 14.	04:06:18
2	REMOTE TECHNICIAN: Stand by.	04:06:24
3	MR. CHEW: If you can pull that up,	04:06:24
4	please.	04:06:26
5	(Exhibit 14 was marked for	04:06:26
6	identification and is attached to the	04:06:26
7	transcript.)	04:06:26
8	REMOTE TECHNICIAN: Showing Exhibit 14	04:06:34
9	on the screen.	04:06:35
10	Q. I will anticipate you wanting to have it	04:06:40
11	a little larger.	04:06:42
12	MR. CHEW: So if the technician will --	04:06:43
13	A. Thank you.	04:06:44
14	MR. CHEW: -- can -- thank you.	04:06:45
15	A. I'm blind.	04:06:48
16	Q. Are these text messages from you to	04:06:49
17	Mr. Depp on April 23rd, 2016?	04:06:51
18	MS. BREDEHOFT: Objection to the form of	04:06:57
19	the question.	04:06:58
20	Go ahead.	04:06:59
21	A. Yes.	04:07:01
22	Q. Would you still have been at Coachella	04:07:05

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

222

1	on this date?	04:07:07
2	A. Sorry. Do you mind if I just read it	04:07:11
3	real quick?	04:07:13
4	Q. Sure.	04:07:14
5	A. I just want to make sure.	04:07:14
6	MS. BREDEHOFT: You can ask to have	04:07:36
7	control so you can scroll down faster.	04:07:38
8	THE WITNESS: Oh, thank you. I would	04:07:40
9	appreciate that.	04:07:41
10	Q. That's it. That's the whole document.	04:07:43
11	A. Oh, okay.	04:07:45
12	Yes, that's -- yes, we were still at	04:07:45
13	Coachella.	04:07:46
14	Q. Are you telling Mr. Depp that your	04:07:47
15	sister misses him and that she's not ignoring his	04:07:51
16	messages?	04:07:53
17	MS. BREDEHOFT: Objection to form of the	04:07:54
18	question.	04:07:57
19	Go ahead.	04:07:57
20	A. Yes, "Missing you like crazy."	04:07:58
21	Q. I'm sorry. I interrupted. Would you	04:08:00
22	please finish your answer.	04:08:03

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

223

1	A. Yes, I do see here that I said that to	04:08:04
2	her [sic]. She's missing you like crazy.	04:08:08
3	"...was missing you like crazy" and "wanted to	04:08:09
4	hear from you."	04:08:12
5	Yeah.	04:08:12
6	Q. And you specifically say, quote, "don't	04:08:13
7	mean to stick my nose where it shouldn't be," end	04:08:15
8	quote, because Amber didn't know that you were	04:08:18
9	texting Johnny; correct?	04:08:20
10	MS. BREDEHOFT: Objection to the form of	04:08:22
11	the question.	04:08:22
12	Go ahead.	04:08:23
13	A. I imagine.	04:08:25
14	Q. And even though your sister told you the	04:08:27
15	day prior that Mr. Depp had hit her, you still	04:08:29
16	wanted to make sure that they communicated; true?	04:08:32
17	MS. BREDEHOFT: Objection to the form of	04:08:36
18	the question.	04:08:36
19	Go ahead.	04:08:37
20	A. I can't recall exactly what my motive	04:08:40
21	would have been, other than to pacify or nullify	04:08:43
22	after an argument, which was pretty typical in	04:08:49

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

224

UN	1	this cycle.	04:08:52
	2	You know, she -- it's very possible she	04:08:55
	3	knew I sent him this message. But I think I was	04:08:57
	4	just trying to deescalate -- deescalate. Because	04:09:02
	5	I knew that often what would make the problems	04:09:05
	6	worse on both sides is that the other one would	04:09:08
	7	perceive that the other one hadn't been reaching	04:09:11
	8	out enough or was reaching out too much. You	04:09:15
	9	know, there was kind of not a clear answer as to	04:09:17
	10	what would help. So I think I was trying to get	04:09:20
	11	in front of any issues that might have arisen	04:09:22
	12	because there was a lack of contact, if that makes	04:09:26
	13	any sense.	04:09:29
	14	Q. No.	04:09:30
	15	And it's fair to say that at this time	04:09:30
	16	you didn't want the two of them to break up; true?	04:09:32
	17	MS. BREDEHOFT: Objection to the form of	04:09:35
	18	the question.	04:09:36
	19	Go ahead.	04:09:37
	20	A. I don't know if it's that simple to	04:09:38
UN	21	answer yes or no. I -- I know at this point	04:09:42
	22	Amber -- Amber -- and I -- or at least I think at	04:09:47

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

225

UN	1	this point Amber was still in a place where she	04:09:51
	2	wanted this relationship to work.	04:09:54
	3	I can't say for sure what was going	04:09:57
	4	through Johnny's head, obviously, but what I	04:09:59
	5	wanted had nothing to do with it. I just was	04:10:02
	6	trying to be a support for my sister in what I	04:10:05
	7	thought she wanted.	04:10:07
	8	Q. Now, before Amber and Johnny got engaged	04:10:11
	9	in September '13, you had known about your	04:10:15
	10	sister's allegations that Mr. Depp had hit her;	04:10:18
	11	correct?	04:10:21
	12	MS. BREDEHOFT: Objection to the form of	04:10:23
	13	the question.	04:10:24
	14	Go ahead.	04:10:26
UN	15	A. Prior to their engagement? I don't -- I	04:10:27
	16	did not know for sure. I had -- you know, I had	04:10:30
	17	suspected here and there. I just knew that the	04:10:35
	18	fights were numerous and they were very ugly. The	04:10:39
	19	arguments between them were so frequent, but I --	04:10:43
	20	I did not know the full extent of everything that	04:10:48
	21	had been going on, no.	04:10:50
	22	Q. Well, you testified that your nickname	04:10:52

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

226

1 was the marriage counselor because you had 04:10:54
2 intervened in a lot of fights between your sister 04:10:58
3 and Johnny; correct? 04:11:01

4 MS. BREDEHOFT: Objection to the form of 04:11:03
5 the question. 04:11:03

6 Go ahead. 04:11:04

7 A. That is correct. 04:11:06

8 It -- very often one of them would ask 04:11:07
9 me to reach out to the other or to go talk to one 04:11:09
10 another or -- you know, the other one, depending 04:11:14
11 on whatever the situation was, because I -- I was 04:11:16
12 close to both of them and I knew both of them very 04:11:21
13 well. 04:11:23

14 Q. And you -- you also testified in your 04:11:25
15 witness statement, which is Exhibit 3, in 04:11:27
16 paragraph 16, that by mid-2013, you had confronted 04:11:30
17 your sister about signs of physical abuse on her 04:11:34
18 body; true? 04:11:38

R 19 MS. BREDEHOFT: Objection to the form of 04:11:39
20 the question. 04:11:40

21 Go ahead. 04:11:41

22 A. Yes. I had asked her about some weird 04:11:44

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

227

1	marks that I had seen on her or -- you know. Yes,	04:11:46
2	I had asked her about it.	04:11:51
3	MR. CHEW: Okay. Let's now turn to	04:11:52
4	Exhibit 15, please.	04:11:55
5	REMOTE TECHNICIAN: Stand by.	04:11:59
R 6	(Exhibit 15 was marked for	04:11:59
7	identification and is attached to the	04:11:59
8	transcript.)	04:11:59
9	Q. And, for the record, these are texts	04:12:05
10	between you and Johnny from your production, WH 58	04:12:09
11	through 60.	04:12:18
12	Okay. We're going to -- if you look at	04:12:28
13	the second page, WH 59, you ask, quote, "And where	04:12:33
14	the fuck is that ugly sis of mine?"	04:12:41
15	Do you see that?	04:12:44
16	A. I'm sorry. I'm still getting down.	04:12:46
17	Q. It's on the next page.	04:12:49
18	A. "I lost a toe."	04:12:52
19	Yes. Where is that ugly sis of mine?	04:12:56
20	Yes. Yes. I see.	04:13:00
21	Q. And you said, "And where the fuck is	04:13:04
22	that ugly sis of mine? She's hiding from me	04:13:06

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

228

1	again."	04:13:09
2	Do you see that?	04:13:09
3	A. Yes.	04:13:10
4	Q. And Mr. Depp then tells you that Amber	04:13:10
5	is at a photo shoot, to which you respond, "Ah.	04:13:13
6	Well, smack her for me when she comes home. Ha.	04:13:17
7	Just a little love tap... Not too hard."	04:13:22
8	Do you see that?	04:13:25
9	A. Yes.	04:13:26
10	Q. And Johnny responds, quote, "Alright...	04:13:26
11	I guess." And then you respond, "... ok, maybe a	04:13:30
12	little hard."	04:13:33
13	Did I read that correctly?	04:13:35
14	A. Yes.	04:13:35
15	MS. BREDEHOFT: Objection to the form of	04:13:36
16	the question.	04:13:36
17	Go ahead.	04:13:38
18	Q. Are you joking --	04:13:38
19	A. Yes, you did.	04:13:38
20	Q. -- are you joking about Johnny slapping	04:13:39
21	Amber?	04:13:43
22	MS. BREDEHOFT: Objection to the form of	04:13:44

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

229

1 the question. 04:13:45

2 Go ahead. 04:13:46

3 A. Yes. 04:13:46

UN 4 Regrettably, I -- there's no -- given 04:13:52

5 everything I know now, to the extent of everything 04:13:59

6 I know now, it's -- there's no way -- this is also 04:14:01

7 taken out of context. A very -- a very bad 04:14:07

8 rapport and way of talking with one another that 04:14:17

9 had been long established, long before these 04:14:20

10 messages were sent. 04:14:22

11 Q. Well, at the time you sent these 04:14:24

12 messages, you had -- you had testified that you 04:14:25

13 allegedly had seen signs of physical abuse on your 04:14:28

14 sister. So why would it be funny to bring up -- 04:14:32

15 why would it be funny to -- to send this to an 04:14:38

16 alleged abuser of your -- of your sister? 04:14:40

17 MS. BREDEHOFT: Objection to the form of 04:14:44

18 the question. 04:14:44

19 Go ahead. 04:14:45

20 A. Again, I did not know the extent of what 04:14:47

21 was going on. Like I said, I had suspicions. 04:14:51

22 And, again, these messages are taken out of 04:14:54

UN	1	context with a series of earlier ones where we	04:14:56
	2	were joking about smacking and hitting or whatever	04:15:02
	3	that were perpetrated by him.	04:15:05
	4	I also -- it's important to point out	04:15:07
	5	that, like, I clearly wasn't calling my sister an	04:15:10
	6	ugly -- an ugly sister of mine or whatever. We	04:15:14
	7	just had a very poor way of communicating with one	04:15:17
	8	another that was bad taste, bad humor, not	04:15:21
	9	anything I would repeat again.	04:15:25
	10	You also have to look at it in the	04:15:28
	11	context of me being, at the time, 25, talking to	04:15:30
	12	my sister's relatively new 50-year-old boyfriend,	04:15:35
	13	who had already been speaking this way to me. It	04:15:38
	14	was a rapport that was established long before I	04:15:42
	15	knew for sure anything had been going on between	04:15:44
	16	the two of them.	04:15:47
	17	Q. It was funny because you knew darn well	04:15:49
	18	that Johnny wasn't an abuser at all; isn't that	04:15:52
	19	true?	04:15:55
	20	MS. BREDEHOFT: Objection to the form of	04:15:56
	21	the question.	04:15:57
	22	Go ahead.	04:15:58

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

231

1	A. I disagree.	04:15:59
2	It was just a bad joke.	04:16:04
3	Q. Have you ever seen Johnny attack Amber	04:16:06
4	on any occasions other than the ones that you've	04:16:11
5	already told us about today?	04:16:14
6	MS. BREDEHOFT: Objection to the form of	04:16:18
7	the question.	04:16:18
8	Go ahead.	04:16:19
9	A. Amber -- it's the only time I've seen	04:16:23
10	him attack Amber. I've definitely seen him be	04:16:26
11	violent with other people, but not Amber. That's	04:16:29
12	the only time that I witnessed it.	04:16:31
13	Q. When have you seen him be violent with	04:16:33
14	other people?	04:16:35
15	A. Well, he once threw a knife at his	04:16:36
16	assistant at dinner.	04:16:38
17	Q. What assistant was that?	04:16:40
18	A. I -- I beg your pardon?	04:16:42
19	Q. What assistant was that?	04:16:45
20	MS. BREDEHOFT: Hold on a second.	04:16:47
21	I am going to object to the	04:16:48
22	interruption.	04:16:49

UN,
R,
ICE

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

232

1	Were you finished with your last answer?	04:16:49
2	THE WITNESS: I was just going to say at	04:16:51
3	dinner.	04:16:53
UN, 4	A. But it was Nathan.	04:16:57
R, 5	Q. When you say "Nathan," you mean Nathan	04:16:59
ICE, 6	Holmes?	04:17:02
ICD 7	A. Yes.	04:17:04
8	Q. Did he hit Nathan Holmes with the knife?	04:17:04
9	MS. BREDEHOFT: Objection to the form of	04:17:07
10	the question.	04:17:08
11	Go ahead.	04:17:09
12	A. I don't believe it actually struck him,	04:17:09
13	no.	04:17:14
14	Q. Okay. So what other violent incidents	04:17:14
15	did you observe?	04:17:17
16	MS. BREDEHOFT: Objection to the form of	04:17:18
17	the question.	04:17:19
18	Go ahead.	04:17:20
19	A. Against a person specifically or just --	04:17:20
20	Q. That's what "violence" usually means.	04:17:27
21	MS. BREDEHOFT: I'm going to object.	04:17:30
22	I'm going to object to -- I'm not even sure	04:17:32

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

233

1	that was a question, but I'm going to object	04:17:35
2	to your testimony.	04:17:37
3	BY MR. CHEW:	04:17:38
4	Q. Yes, what violence -- what violence	04:17:39
5	against any other person other than missing Nathan	04:17:41
6	Holmes with a -- a knife have you witnessed?	04:17:44
7	MS. BREDEHOFT: Objection to the form.	04:17:47
8	A. Other than --	04:17:49
9	THE WITNESS: Sorry.	04:17:52
10	MS. BREDEHOFT: Go ahead.	04:17:53
11	A. Other than what I saw on the stairs and	04:17:53
12	him hurling a knife at Nathan, I have not seen	04:17:55
13	anything else.	04:17:59
14	Q. Okay. Have you ever seen Johnny punch,	04:18:00
15	slap, hit or throw things at Amber on any	04:18:03
16	occasions other than the ones you've already told	04:18:08
17	us about today?	04:18:11
18	MS. BREDEHOFT: Objection to the form of	04:18:13
19	the question.	04:18:13
20	Go ahead.	04:18:14
21	A. Other than the staircase, no.	04:18:16
22	Q. Have you ever personally witnessed	04:18:18

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

234

1	Johnny physically harm Amber on any occasions	04:18:20
2	other than the ones that you've already told us	04:18:24
3	about today?	04:18:26
4	MS. BREDEHOFT: Objection to the form of	04:18:27
5	the question.	04:18:28
6	Go ahead.	04:18:29
7	A. No.	04:18:30
8	Q. Okay. Have you ever worked with your	04:18:32
9	sister at the same establishment?	04:18:36
10	A. I'm sorry. What is -- what	04:18:44
11	establishment?	04:18:45
12	Q. Have you ever worked with your sister at	04:18:46
13	any company, business or establishment?	04:18:48
14	A. There was a brief period where I was	04:18:51
15	helping her out, but not -- we did -- our time	04:18:58
16	there didn't overlap, but we did work at the	04:19:05
17	same -- at the same -- it was a -- it was a bar	04:19:08
18	called The Score, but I don't believe our time	04:19:13
19	overlapped there. I think we worked there at	04:19:16
20	separate times.	04:19:18
21	Q. Wasn't The Score a strip bar?	04:19:19
22	MS. BREDEHOFT: Objection to the form of	04:19:21

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

235

1	the question.	04:19:21
2	Go ahead.	04:19:23
3	A. It was.	04:19:24
4	Q. And didn't you work the door at the	04:19:26
5	strip bar?	04:19:28
6	MS. BREDEHOFT: Objection to the form of	04:19:28
7	the question.	04:19:29
8	Go ahead.	04:19:30
9	A. I did.	04:19:31
10	Q. And your sister was a stripper at the	04:19:32
11	strip bar; correct?	04:19:34
12	MS. BREDEHOFT: Objection to the form of	04:19:35
13	the question.	04:19:36
14	Go ahead.	04:19:37
15	A. At some point, yes. But again, not	04:19:39
16	while I was there.	04:19:42
17	Q. Did you ever see your sister strip?	04:19:43
18	MS. BREDEHOFT: Objection to the form of	04:19:45
19	the question.	04:19:46
20	Go ahead.	04:19:47
21	A. No.	04:19:49
22	Q. Was your sister also an escort at The	04:19:50

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

236

1	Score?	04:19:53
2	MS. BREDEHOFT: Objection to the form of	04:19:54
3	the question.	04:19:54
4	Go ahead.	04:19:55
5	A. Absolutely not.	04:19:57
6	Q. For how long was she a -- for how	04:20:01
7	many -- for how long did she strip at The Score?	04:20:03
8	MS. BREDEHOFT: Objection to the form of	04:20:06
9	the question.	04:20:06
10	Go ahead.	04:20:07
11	A. I couldn't recall. You'd have to ask	04:20:08
12	her.	04:20:12
13	Q. Who is Peter Berg?	04:20:16
14	A. He is a director, a friend of Amber's.	04:20:18
15	I don't -- I actually don't know if they're still	04:20:27
16	friendly. He directed one of her first movies,	04:20:30
17	Friday Night Lights.	04:20:33
18	Q. When did your sister's affair with Peter	04:20:35
19	Berg begin?	04:20:39
20	MS. BREDEHOFT: Objection to the form of	04:20:41
21	the question.	04:20:41
22	Go ahead.	04:20:43

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

237

1	A.	I don't know if I'd categorize it as an	04:20:43
2		affair.	04:20:48
3	Q.	When did they --	04:20:49
4	A.	I don't know --	04:20:50
5	Q.	-- when did they have sex?	04:20:51
6		MS. BREDEHOFT: Objection to the form of	04:20:53
7		the question and objection to the	04:20:53
8		interruption.	04:20:55
9		Go ahead.	04:20:57
10	A.	I have no idea.	04:20:57
11	Q.	Wasn't she under age when she first had	04:21:02
12		sex with Mr. Berg?	04:21:04
13		MS. BREDEHOFT: Objection to the form of	04:21:07
14		the question.	04:21:07
15		Go ahead.	04:21:09
16	A.	I don't know that to be true.	04:21:10
17	Q.	But you know there did come a time when	04:21:15
18		she had sex with the director of her first movie?	04:21:18
19		MS. BREDEHOFT: Objection to the form of	04:21:22
20		the question.	04:21:23
21		Go ahead.	04:21:25
22	A.	I was made aware that they did start a	04:21:25

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

238

1	relationship at some point. I couldn't tell you	04:21:27
2	when it started or when it ended.	04:21:29
3	Q. It was before the movie came out;	04:21:33
4	correct?	04:21:35
5	MS. BREDEHOFT: Objection to the form of	04:21:36
6	the question.	04:21:37
7	Go ahead.	04:21:38
8	A. I don't know.	04:21:39
9	Q. The movie actually came out when she was	04:21:41
10	only 18; true?	04:21:44
11	MS. BREDEHOFT: Objection to the form of	04:21:46
12	the question.	04:21:46
13	Go ahead.	04:21:47
14	A. I don't recall her age when it came out.	04:21:49
15	Q. And that movie was shot before it -- the	04:21:52
16	year it came out; correct?	04:21:57
17	MS. BREDEHOFT: Objection to the form of	04:21:59
18	the question.	04:22:00
19	Go ahead.	04:22:01
20	A. I would imagine so. I don't -- again, I	04:22:02
21	couldn't tell you specific dates or years.	04:22:06
22	Q. All right.	04:22:09

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

239

1	MR. CHEW: Let's go to Exhibit 9,	04:22:09
2	please.	04:22:12
R 3	REMOTE TECHNICIAN: Stand by.	04:22:14
4	(Exhibit 9 was marked for identification	04:22:14
5	and is attached to the transcript.)	04:22:14
6	REMOTE TECHNICIAN: Showing Exhibit 9 on	04:22:26
7	the screen.	04:22:27
8	BY MR. CHEW:	04:22:28
9	Q. For the record, these are text messages	04:22:28
10	between you and Mr. Depp that you produced, WH 37.	04:22:30
11	Do you recognize these messages?	04:22:40
R 12	MS. BREDEHOFT: Objection to the form of	04:22:45
13	the question.	04:22:46
14	Go ahead.	04:22:47
15	And, again, if you take control, you can	04:22:48
16	scroll down. That might make it faster.	04:22:50
17	THE WITNESS: Thank you.	04:22:53
18	A. Okay.	04:22:53
19	Q. Is the green box Mr. Depp?	04:23:07
20	A. Yes.	04:23:12
21	Q. And are you the blue box?	04:23:12
22	A. Yes.	04:23:14

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

240

1	Q.	And does the contact information say	04:23:16
2	Mr. Hop;	one of your nicknames for Mr. Depp?	04:23:18
3	A.	Correct.	04:23:22
4	Q.	And what's the date on these text	04:23:24
5	messages?		04:23:25
6	A.	The 9th of April, 2015.	04:23:26
7	Q.	And in Exhibit 9, you text Mr. Depp,	04:23:33
8	quote, "Hey there, sweet brother outlaw. Just		04:23:38
9	wanted you to know that I love you and I'm here		04:23:40
10	for you if you need anything. No matter what,"		04:23:43
11	unquote.		04:23:46
12		Did I read that correctly?	04:23:47
13	A.	Yes.	04:23:48
14	MS. BREDEHOFT:	Objection to the form of	04:23:48
15	the question.		04:23:49
16		Go ahead. Go ahead.	04:23:50
17	A.	Yes, I do see that.	04:23:50
18	Q.	Why did you text Johnny that message?	04:23:52
19	A.	I have -- I actually don't know. I	04:23:54
20	don't recall what this was in reference to or what		04:23:59
21	it was about --		04:24:01
22	Q.	Weren't you --	04:24:02

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

241

1 A. -- but I imagine it was after a spat,
2 just given the way he's speaking about her
3 afterward.

4 Q. And weren't you showing support for
5 Johnny after another fight with Amber?

R 6 MS. BREDEHOFT: Objection to the form of
7 the question.
8 Go ahead.

9 A. As I routinely did after a fight,
10 showing support for both of them.

P,
R 11 Q. And he says -- Mr. Depp then says he's
12 all right, and says, quote, "Though I never, ever
13 want to lay eyes on that filthy whore, Amber ...
14 most embarrassing ... J."
15 And then, "This marriage is the dumbest
16 thing I've ever done. She's been all over dudes
17 for months. I had never cheated on her, triple
18 exclamation mark, no matter what she spews,"
19 unquote.

20 Did I read that correctly?

21 MS. BREDEHOFT: Objection to the form of
22 the question.

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

242

1	Go ahead.	04:24:52
2	A. Yes.	04:24:52
3	Q. In the last text here you say, quote, "I	04:24:53
4	don't know why you guys are fighting right now,	04:24:56
5	but I have to tell you she loves you so much and	04:24:59
6	has never -- would never cheat on you either.	04:25:01
7	Trust me when I tell you that," unquote.	04:25:04
8	Did I read that correctly?	04:25:09
R 9	MS. BREDEHOFT: Objection to the form of	04:25:10
10	the question.	04:25:10
11	Go ahead.	04:25:12
12	A. Yes.	04:25:12
13	Q. Does that confirm or refresh your memory	04:25:12
14	as to why Ms. Heard and Mr. Depp may have been	04:25:15
15	fighting?	04:25:19
16	MS. BREDEHOFT: Objection to the form of	04:25:20
17	the question.	04:25:21
18	Go ahead.	04:25:22
19	A. I'm sorry, it doesn't.	04:25:23
20	Q. Isn't this a few weeks after the	04:25:24
21	incident where you allege in your witness	04:25:26
22	statement, and you've testified today, that	04:25:29

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

243

1 Mr. Depp tried to physically assault your sister 04:25:32

2 in front of you on the staircase? 04:25:36

3 MS. BREDEHOFT: Objection to the form of 04:25:38

4 the question. 04:25:39

5 Go ahead. 04:25:40

6 A. The dates absolutely would lead me to 04:25:41

7 believe that it was after that incident. 04:25:44

UN, 8 Again, even in that argument, it was -- 04:25:47

R, 9 it was established that he had actually cheated on 04:25:50

FSPK 10 her. You know, he nullified it and justified it 04:25:53

11 whatever way he could. But then, as they always 04:25:59

12 did, they just reconciled somehow just days after. 04:26:01

13 And who knows, who knows what this was in 04:26:06

14 reference to or what it was about specifically. I 04:26:08

15 don't recall. 04:26:11

16 Q. But -- but my point is, this is after 04:26:11

17 the -- the violent incident that you described on 04:26:13

18 the staircase; true? 04:26:17

R 19 MS. BREDEHOFT: Objection to the form of 04:26:18

20 the question. 04:26:19

21 Go ahead. 04:26:20

22 A. Yes. 04:26:22

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

244

UN, IO, AR, PK, SP,	1	Q. But nevertheless, you're texting Johnny	04:26:23
	2	to try to have him stay with your sister; aren't	04:26:27
	3	you?	04:26:30
P	4	MS. BREDEHOFT: Objection to the form of	04:26:31
	5	the question.	04:26:31
	6	Go ahead.	04:26:32
	7	A. It's an oversimplification of what's	04:26:33
UN, IO, AR, PK, SP, P	8	happening and what happened in the duration of	04:26:38
	9	their relationship. I disagree with the	04:26:41
	10	oversimplification of it.	04:26:43
	11	The entirety of their relationship,	04:26:45
	12	the -- the fighting, on and off again, the -- the	04:26:47
	13	passion is -- they loved each other so much and	04:26:52
	14	they both wanted it to work so much at some point	04:26:55
	15	that whether or not it was right, whether or not	04:26:58
	16	it made sense to anybody else, it was irrelevant.	04:27:01
	17	To those two, they were still trying to make it	04:27:04
	18	work, for whatever reason. And --	04:27:07
	19	Q. But you sure -- you sure weren't telling	04:27:09
	20	your sister to back off -- you sure weren't	04:27:12
	21	telling him to back off your sister; right?	04:27:16
	22	MS. BREDEHOFT: Objection to your	04:27:19

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

245

1	interruption.	04:27:20
2	Had you finished your answer?	04:27:20
UN, IO, AR, PK, SP, P	3 THE WITNESS: No, I hadn't.	04:27:22
4	Q. Please finish.	04:27:25
5	A. As I was -- as I was starting to say, is	04:27:26
6	that despite whether or not I felt okay with it or	04:27:29
7	not, and I -- I did have separate conversations	04:27:31
8	with her expressing my reluctance and, you know --	04:27:34
9	at the end of the day, I was there to support her	04:27:39
10	in what she wanted at that time. Whether or not	04:27:42
11	that was the right call or not, I -- who's to say.	04:27:44
12	I can't.	04:27:48
13	But at the time, Amber wanted this to	04:27:51
14	work. And she would often tell me, even if I	04:27:53
15	didn't agree with it, even if I didn't think it	04:27:55
16	was okay, "Help me, Whitney. I need to -- I need	04:27:57
17	to get him back. I need to make sure that this is	04:27:59
18	okay."	04:28:02
19	She was so in love with him that she was	04:28:02
20	willing to put up with so much. And me, as her	04:28:05
21	sister, I had to be there to support her. And so	04:28:09
22	if she's asking me to send her me- -- send	04:28:12

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

246

UN, IO, AR, PK, SP, P	1 2 3 4 5 6 7	messages like this, I was going to do it. In hindsight, would I do it again? Absolutely not. But I didn't know then what I know now. Again, we're talking -- it was just -- it seems like a lifetime ago. Q. Did Amber -- did Amber, in fact, ask you to send the message you sent in Exhibit 9?	04:28:14 04:28:17 04:28:18 04:28:23 04:28:26 04:28:28 04:28:31
	8 9 10	MS. BREDEHOFT: Objection to the form of the question. Go ahead.	04:28:34 04:28:36 04:28:36
UN, IO, AR, PK, SP, P	11 12 13 14 15 16 17	A. I can't recall if she specifically asked me to send this message. But in the past, both of them had asked me to reach -- to send messages to the other one at one point or the other saying, oh, tell him I love him, or tell her I love her. But this one, I can't recall if it was at her behest or not.	04:28:37 04:28:39 04:28:43 04:28:47 04:28:49 04:28:53 04:28:56
	18 19 20 21 22	Q. Okay. MR. CHEW: Let's look at Exhibit 10, which is another one of your documents, WH 38.	04:28:57 04:28:57 04:28:58 04:29:03 04:29:05

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

247

1 R 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	<p>(Exhibit 10 was marked for identification and is attached to the transcript.)</p> <p>BY MR. CHEW:</p> <p>Q. This is another series of texts between you and Johnny Depp; correct?</p> <p>A. Yes.</p> <p>Q. And you start the text --</p> <p>A. No. I'm sorry. Oh. I'm just wondering why it's both my phone number and my e-mail. But, yes, it's to Johnny and I.</p> <p>Q. Okay. And you see the date was April 18th, 2015?</p> <p>A. Yes.</p> <p>Q. And that's just a few days after the text we just talked about, Exhibit 9; true?</p> <p>A. Sure. Yes.</p> <p>Q. And you start the text with, "Hey Hammerhead." That's just another friendly nickname that you had for Johnny; right?</p> <p>A. Correct.</p>	<p>04:29:05 04:29:05 04:29:05 04:29:13 04:29:14 04:29:18 04:29:20 04:29:30 04:29:32 04:29:38 04:29:42 04:29:44 04:29:46 04:29:48 04:29:49 04:29:51 04:29:54 04:29:59 04:30:01 04:30:02 04:30:04 04:30:06</p>
--	--	--

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

248

R	1	MS. BREDEHOFT: Objection to the form of	04:30:07
	2	the question, asked and answered.	04:30:08
	3	Go ahead.	04:30:10
	4	Q. You go on to write, quote, "Just was	04:30:10
	5	thinking about you and hope you're well... Also	04:30:13
	6	wanted to say thank you so much for this fucking	04:30:16
	7	trip. The bitch is a happy fucking camper having	04:30:20
	8	us all here and I just wanted to thank you for	04:30:22
	9	everything. Love you, fucker," unquote.	04:30:25
	10	Did I read that correctly?	04:30:29
R	11	MS. BREDEHOFT: Objection to the form of	04:30:30
	12	the question.	04:30:31
	13	Go ahead.	04:30:32
	14	A. Yes.	04:30:32
	15	Q. What trip are you referring to here?	04:30:33
	16	A. I don't know, actually.	04:30:34
	17	Q. When you say "the bitch," who are you	04:30:42
	18	referring to?	04:30:43
R	19	MS. BREDEHOFT: Objection to the form of	04:30:44
	20	the question.	04:30:45
	21	Go ahead.	04:30:46
	22	A. My sister.	04:30:46

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

249

1	Q.	Do you recall going on a trip for your	04:30:49
2		sister's birthday in 2015?	04:30:50
R 3	MS. BREDEHOFT:	Objection to the form of	04:30:53
4		the question.	04:30:54
5		Go ahead.	04:30:55
6	A.	I can't recall specifically. I mean,	04:30:55
7		this message clearly indicates that we were on a	04:31:01
8		trip, but I don't recall where it was or what it	04:31:04
9		was for.	04:31:06
10	Q.	And that's around the time of your	04:31:08
11		sister's birthday; correct?	04:31:09
12	A.	Yes, it is.	04:31:11
13	Q.	Sounds like Mr. Depp paid for the trip;	04:31:13
14		true?	04:31:15
R 15	MS. BREDEHOFT:	Objection to the form of	04:31:16
16		the question.	04:31:16
17		Go ahead.	04:31:18
18	A.	I imagine so, which is why I'm thanking	04:31:20
19		him.	04:31:23
20	Q.	And Johnny paid for trips or events for	04:31:23
21		Amber, you, and her friends quite often; right?	04:31:27
22	MS. BREDEHOFT:	Objection to the form of	04:31:31

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

252 .

1	On a number of occasions you -- in fact,	04:33:27
2	Leo -- Leo stopped me on Christian Carino,	04:33:28
3	who is the agent of Johnny Depp.	04:33:31
4	We've been stopped on multiple occasions	04:33:33
5	at three-and-a-half hours and made clear --	04:33:37
6	even on Jennifer Howell, that you didn't ask	04:33:40
7	any questions after that.	04:33:43
8	So here's the deal. So it's my turn.	04:33:45
9	We're going take -- I'm going to give the	04:33:49
10	court reporters a break here.	04:33:51
11	Is 30 minutes enough for a break for you	04:33:53
12	guys for lunch? I'm mindful that we are on	04:33:56
13	California time here. Would 30 minutes be	04:33:57
14	enough?	04:33:58
15	Court reporters, I'm asking you guys.	04:33:59
16	Are you okay?	04:33:59
17	THE COURT REPORTER: Counsel, I'm fine.	04:34:10
18	Whatever everybody agrees to is fine by me.	04:34:11
19	MS. BREDEHOFT: Right.	04:34:15
20	Well, let's take a 30-minute break, and	04:34:15
21	then we'll start up. Okay?	04:34:17
22	MS. VASQUEZ: I want to correct the	04:34:19

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

253

1	record.	04:34:21
2	Mr. Presiado did not stop Mr. Rottenborn	04:34:21
3	at three-and-a-half hours. He could have	04:34:23
4	proceeded if he had more questions yesterday.	04:34:24
5	I was at that deposition.	04:34:26
6	Elaine, that's a gross	04:34:27
7	mischaracterization of what happened. You	04:34:29
8	were not there. So that needs to be	04:34:30
9	corrected.	04:34:33
10	MS. BREDEHOFT: It's -- it's --	04:34:35
11	MR. CHEW: Thank you.	04:34:36
12	MS. BREDEHOFT: It will speak for	04:34:37
13	itself.	04:34:37
14	So we're going off the record.	04:34:39
15	THE VIDEOGRAPHER: Off the record at	04:34:41
16	4:34.	04:34:42
17	MS. BREDEHOFT: Thank you.	04:34:44
18	(Recess in proceedings.)	05:03:16
19	THE VIDEOGRAPHER: Back on the record at	05:03:18
20	5:03.	05:03:19
21	MS. BREDEHOFT: So I wanted to just	05:03:22
22	respond to a couple of things that Mr. Chew	05:03:23

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

254

1	said, before we get started.	05:03:26
2	I'm going to quote Sam Moniz from a	05:03:29
3	January 19th, 2021, e-mail: "For the	05:03:32
4	avoidance of doubt, please be advised that	05:03:36
5	Mr. Depp is entitled to take equal question	05:03:38
6	time at all depositions of third-party	05:03:40
7	witnesses and expressly reserves the right to	05:03:43
8	do so. Consistent with this long-established	05:03:46
9	principles of California law, as well as our	05:03:49
10	prior representation to you, including,	05:03:51
11	without limitation, my e-mail to all counsel	05:03:53
12	on November 10th, 2020, as well as multiple	05:03:55
13	discussions with your predecessor counsel,	05:03:58
14	you should assume that Mr. Depp may take up	05:04:01
15	to half of the 7 hours allotted for each	05:04:03
16	deposition under CCP 2025.290."	05:04:06
17	I'm also going to quote Mr. Presiado,	05:04:13
18	from the Christian Carino deposition,	05:04:15
19	"Because we cross-designated, we're entitled	05:04:18
20	to as much time as you are. So half of 7	05:04:20
21	hours is three-and-a-half hours. And you've	05:04:23
22	completed three-and-a-half hours on the	05:04:25

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

255

1	record, so now it's our turn."	05:04:27
2	I was prepared to continue and to take	05:04:30
3	Whitney's deposition. I have uploaded	05:04:34
4	exhibits and have a full outline. However,	05:04:37
5	while I was speaking with my client -- my	05:04:40
6	client during the break, she indicated to me	05:04:42
7	that she's feeling very tired and she's not	05:04:45
8	feeling well.	05:04:47
9	She went to her doctor yesterday. She's	05:04:48
10	nine-and-a-half months pregnant. Her doctor	05:04:51
11	told her that she is about to give birth at	05:04:53
12	any time, that she is that far along.	05:04:56
13	In light of all of that, I have made the	05:04:59
14	decision that her health is more important	05:05:02
15	than my putting more things on the record and	05:05:04
16	authenticating some of the things that I	05:05:08
17	planned to do. So we are going to terminate	05:05:11
18	the deposition at this time.	05:05:12
19	And I'm going to just remind you as well	05:05:14
20	that for the Jennifer Howell deposition,	05:05:16
21	after I took my three-and-a-half hours,	05:05:18
22	Camille was not feeling well and asked that	05:05:21

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

256

1	we not resume the deposition, which I said	05:05:23
2	absolutely, because of her illness.	05:05:26
3	In addition, Christian Carino's	05:05:29
4	deposition has never been resumed for the	05:05:31
5	three-and-a-half hours.	05:05:33
6	But the most important thing here is	05:05:34
7	Whitney Henriquez's health. And clearly,	05:05:36
8	she's not feeling well, and she's -- she's	05:05:38
9	very, very tired. And I do not -- under the	05:05:41
10	circumstances, I think the right thing to do	05:05:44
11	is to terminate the deposition at this point.	05:05:47
12	Whitney, can you just acknowledge on the	05:05:50
13	record that what I have represented to	05:05:52
14	counsel about your doctor's visit and your	05:05:53
15	feeling tired and not feeling well are	05:05:56
16	accurate.	05:05:58
17	THE WITNESS: Absolutely. I agree with	05:06:00
18	everything you just said.	05:06:02
19	And just to further elaborate, I really	05:06:05
20	am due at any moment. And I really have kind	05:06:07
21	of been pushed. And I want to be helpful, as	05:06:10
22	I can be, but I'm literally about to give	05:06:12

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

257

1	birth at any moment. And I hope you guys	05:06:15
2	understand.	05:06:18
3	MS. BREDEHOFT: Thank you.	05:06:18
4	Okay. And we'll -- for the court	05:06:19
5	reporters, we will read.	05:06:21
6	THE VIDEOGRAPHER: Okay. We're off the	05:06:24
7	record at 5:06.	05:06:25
8	(Off Video Record.)	05:06:27
9	MS. BREDEHOFT: Okay. Thank --	05:06:27
10	MS. VASQUEZ: Ben, you're on mute. Hold	05:06:30
11	on. We shouldn't be off the record yet.	05:06:31
12	Ben's on mute.	05:06:31
13	MR. CHEW: We're not off the record. We	05:06:33
14	are not off the record. Your witness may be	05:06:35
15	excused, but we are not off the record.	05:06:37
16	MS. BREDEHOFT: Whitney, you may leave.	05:06:42
17	We are off the record. The court	05:06:45
18	reporter --	05:06:45
19	MR. CHEW: No, we are not.	05:06:45
20	MS. BREDEHOFT: We are off the record.	05:06:45
21	MR. CHEW: This is absolutely	05:06:46
22	outrageous. Even for you, Elaine. This is a	05:06:47

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

258

1	new low. And you have no right to	05:06:50
2	unilaterally terminate the deposition.	05:06:52
3	And I will be heard on the record or	05:06:54
4	we'll be using a different reporting company	05:06:56
5	in the future.	05:06:58
6	THE COURT REPORTER: Counsel, this is	05:07:03
7	your stenographer, and you have been on the	05:07:03
8	record the entire time.	05:07:07
9	MR. CHEW: Good.	05:07:08
10	THE VIDEOGRAPHER: You're not on video,	05:07:08
11	just the written.	05:07:08
12	MR. CHEW: Let me please state this.	05:07:10
13	The one thing and the only thing that I agree	05:07:11
14	with that Ms. Bredehoft said is that	05:07:13
15	Ms. Henriquez's health is of paramount	05:07:17
16	importance. Because of that, and because she	05:07:22
17	is pregnant and about to have a baby, of	05:07:25
18	course, we are happy and we -- to excuse her	05:07:27
19	for the day.	05:07:32
20	(Elaine Bredehoft, Esq. exited the	05:07:34
21	virtual deposition room.)	05:07:34
22	MR. CHEW: But the deposition will	05:07:36

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

259

1	continue in the future -- in the near future,	05:07:37
2	when she's feeling better. We don't want her	05:07:40
3	to testify when she's tired and it could	05:07:42
4	jeopardize her health or the baby's health.	05:07:45
5	But everything else Ms. Bredehoft said	05:07:48
6	was outrageous, and she knows it. We are	05:07:51
7	entitled to complete this deposition. Ms.	05:07:55
8	Bredehoft knows that. The deposition has	05:07:59
9	only gone 3.5 hours. This is her witness.	05:08:05
10	She represents the witness. She represents	05:08:09
11	the defendant.	05:08:11
12	The only person on the planet other than	05:08:13
13	Amber Heard, the only one willing to back the	05:08:17
14	lie, the only one who claims to have seen --	05:08:20
15	in the world -- Johnny Depp ever raise a hand	05:08:23
16	to a woman is the sister, and we are entitled	05:08:26
17	to a full deposition of her sister; and we	05:08:30
18	will reconvene this.	05:08:33
19	And if Ms. Bredehoft does not agree to	05:08:36
20	bring Ms. Henriquez back when she's doing	05:08:39
21	better before the end --	05:08:43
22	(Elaine Bredehoft, Esq. entered the	05:08:44

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

260

1	virtual deposition room.)	05:08:44
2	MR. CHEW: Let me finish.	05:08:46
3	-- before the end of the discovery	05:08:47
4	period. If she doesn't agree to do that	05:08:48
5	right now, we will file an emergency motion	05:08:51
6	and have it heard by Chief Judge Azcarate.	05:08:55
7	So we would ask that this part of the	05:09:00
8	transcript be expedited so that we may	05:09:02
9	properly place it before the Court on an	05:09:06
10	emergency basis, because this is an absolute	05:09:08
11	outrage, and we don't agree with anything	05:09:12
12	that she said other than the -- Ms.	05:09:14
13	Henriquez's health being paramount.	05:09:17
14	So we will see you again, Ms. Henriquez,	05:09:20
15	when you feel better. I hope you feel	05:09:22
16	better. Go back and get some rest.	05:09:24
17	MS. BREDEHOFT: All right. I'm going to	05:09:27
18	go on the record. I went off. I left the	05:09:28
19	Zoom and had indicated to my client to leave	05:09:31
20	the Zoom because the court reporter had	05:09:33
21	indicated we were off the record.	05:09:36
22	I was not on for any of what Mr. Chew	05:09:37

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

261

1	just said. I just came back on right now.	05:09:40
2	So I didn't hear anything that he said.	05:09:43
3	But, Whitney, I would like you to leave	05:09:45
4	the meeting. This is not --	05:09:47
5	THE WITNESS: Okay.	05:09:48
6	MS. BREDEHOFT: -- appropriate. I want	05:09:49
7	you to go take your care of yourself. Good	05:09:50
8	luck. Okay?	05:09:54
9	THE WITNESS: Okay.	05:09:55
10	MS. BREDEHOFT: Go take care of	05:09:55
11	yourself. That's the most important thing	05:09:56
12	here.	05:09:58
13	(Whitney Henriquez exited the virtual	05:09:58
14	deposition room.)	05:09:58
15	MS. BREDEHOFT: Okay. I didn't hear	05:09:58
16	anything that he said. I am happy to have	05:09:59
17	him expedite or whatever, and I will deal	05:10:01
18	with it with the Court when we need to.	05:10:03
19	I'm leaving the meeting now. Let's be	05:10:06
20	clear.	05:10:08
21	(Elaine Bredehoft, Esq. exited the	05:10:08
22	virtual deposition room.)	05:10:08

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

262

1	THE COURT REPORTER: Counsel, your	05:10:17
2	record is still open unless you want me to	05:10:18
3	close it out.	05:10:20
4	MR. CHEW: No, I think we -- what we	05:10:21
5	need, please, is an expedited transcript of	05:10:23
6	the last 15 minutes of my examination of the	05:10:28
7	witness up until this point. If we could	05:10:32
8	expedite that for production tomorrow,	05:10:35
9	because clearly we're going to have to ask	05:10:38
10	the Court for an emergency order that	05:10:43
11	Ms. Henriquez come back to complete her	05:10:48
12	deposition.	05:10:50
13	It's outrageous what Ms. Bredehoft did,	05:10:53
14	and I think the record will be very clear in	05:10:56
15	that regard. Her representations were	05:11:00
16	inaccurate, and we're entitled to complete	05:11:03
17	the deposition.	05:11:07
18	Ms. Vasquez may want to say something as	05:11:08
19	well.	05:11:10
20	MS. VASQUEZ: Well, I want to confirm	05:11:10
21	whether any deposition exhibits have been	05:11:11
22	uploaded by Ms. Bredehoft or her firm.	05:11:13

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

263

1	REMOTE TECHNICIAN: I have not seen any	05:11:18
2	exhibits in my download link.	05:11:19
3	MS. VASQUEZ: Got it.	05:11:22
4	REMOTE TECHNICIAN: I'm not sure what	05:11:22
5	she --	05:11:23
6	MS. VASQUEZ: That's all I need to know.	05:11:24
7	REMOTE TECHNICIAN: Okay.	05:11:26
8	MS. VASQUEZ: Thank you. That's what I	05:11:26
9	figured.	05:11:26
10	MR. CHEW: Another misrepresentation on	05:11:27
11	the record --	05:11:28
12	MS. VASQUEZ: Exactly.	05:11:29
13	MR. CHEW: -- by Ms. Bredehoft. Very	05:11:30
14	unfortunate.	05:11:32
15	MS. VASQUEZ: Yes, very unfortunate	05:11:32
16	indeed. Okay. I think that's it.	05:11:33
17	MR. CHEW: Thank you, all.	05:11:35
18	MS. VASQUEZ: Thank you, guys.	05:11:36
19	REMOTE TECHNICIAN: All right. Take	05:12:21
20	care.	05:12:21
21	THE COURT REPORTER: And, Counsel,	05:12:21
22	just -- this is off the record, and I'm happy	05:12:21

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

264

1	to share it with anybody.	05:12:21
2	We're never off the record -- how can I	05:12:21
3	state this? I know that Kim went off the	05:12:21
4	video record, and that happens from time to	05:12:21
5	time, but your stenographer does keep writing	05:12:21
6	just to ensure...	05:12:21
7	So you did not miss a word of anything	05:12:21
8	that transpired.	05:12:21
9	MR. CHEW: Thank you very much. I	05:12:21
10	appreciate that.	05:12:21
11	THE COURT REPORTER: Oh, no, absolutely.	05:12:21
12	I have to have agreement by both counsel.	05:12:21
13	MS. VASQUEZ: Yeah, that's how it has to	05:12:21
14	be.	05:12:21
15	MR. CHEW: That didn't sound right to	05:12:21
16	me. I have not heard of someone unilaterally	05:12:21
17	saying we were going off the record, so thank	05:12:21
18	you.	05:12:21
19	(Elaine Bredehoft, Esq. entered the	05:12:21
20	virtual deposition room.)	05:12:21
21	MS. BREDEHOFT: I don't want you to go	05:12:22
22	back off the record.	05:12:22

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

265

1	I just came back on. I told you I was	05:12:22
2	leaving and apparently you kept talking.	05:12:23
3	But somebody incorrectly said we had not	05:12:25
4	uploaded exhibits. Who said that? Can you	05:12:28
5	go back and correct that on the record,	05:12:31
6	please?	05:12:33
7	REMOTE TECHNICIAN: Yes. With the	05:12:34
8	repository download link I have, I'm only	05:12:36
9	seeing exhibits from Mr. Chew. I don't know	05:12:38
10	if there's a different link somewhere or --	05:12:40
11	MS. BREDEHOFT: We have -- we have	05:12:42
12	uploaded exhibits. We absolutely have	05:12:43
13	uploaded exhibits and we absolutely fully	05:12:45
14	intended to take her deposition for	05:12:47
15	three-and-a-half hours.	05:12:49
16	MS. VASQUEZ: Why would you take your	05:12:50
17	own witness's deposition, Elaine? I mean,	05:12:52
18	that's absurd. You're an attorney that's	05:12:54
19	practiced how many years? We know that you	05:12:57
20	have no intention of deposing your own	05:12:59
21	witnesses.	05:13:01
22	MS. BREDEHOFT: Can we stay on the	05:13:02

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

#266

1	record until you verify --	05:13:03
2	Lucien, I want it verified that we	05:13:04
3	uploaded those exhibits.	05:13:07
4	MR. CHEW: Maybe he's lying -- maybe	05:13:09
5	he's lying like all the police officers are	05:13:09
6	lying in this case.	05:13:11
7	MS. BREDEHOFT: Lucien, it is really	05:13:13
8	important to us that we get accurately on the	05:13:14
9	record that we uploaded exhibits.	05:13:17
10	MR. CHEW: You didn't.	05:13:20
11	REMOTE TECHNICIAN: Is there a link that	05:13:21
12	you can share with me that I can maybe check?	05:13:21
13	MR. CHEW: She's probably sending it	05:13:25
14	right now.	05:13:26
15	MS. BREDEHOFT: No. No.	05:13:26
16	MR. CHEW: She's probably sending it	05:13:27
17	right now. Let's get a time stamp on that	05:13:27
18	link.	05:13:27
19	MS. BREDEHOFT: I really don't	05:13:32
20	appreciate that, Mr. Chew. You're calling us	05:13:34
21	liars and we're not lying.	05:13:36
22	MR. CHEW: I don't appreciate you	05:13:38

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

267

1	terminating a material witness in the middle	05:13:39
2	of a deposition either.	05:13:40
3	MS. BREDEHOFT: We absolutely uploaded	05:13:41
4	this this morning. Hold on just a second.	05:13:42
5	I'm going to get --	05:13:45
6	MR. CHEW: Maybe you did it in invisible	05:13:45
7	ink.	05:13:46
8	MS. BREDEHOFT: You know, Mr. Chew, I	05:13:48
9	don't appreciate you, your unprofessionalism.	05:13:49
10	It's just inexcusable.	05:13:53
11	MR. CHEW: You can call me	05:13:55
12	unprofessional when I pull a witness in the	05:13:57
13	middle of a deposition.	05:13:59
14	MS. BREDEHOFT: She's nine-and-a-half	05:14:01
15	months pregnant. She's not feeling well.	05:14:02
16	MR. CHEW: And I said on that basis and	05:14:04
17	that basis alone, we agreed that she should	05:14:05
18	be excused, but not that the deposition has	05:14:10
19	ended. And you've refused to give us a new	05:14:13
20	date for the deposition.	05:14:15
21	MS. BREDEHOFT: I wasn't on -- I	05:14:16
22	wasn't --	05:14:17

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

268

1	MR. CHEW: The basis --	05:14:17
2	MS. BREDEHOFT: -- I wasn't even here.	05:14:18
3	I thought we were off the record.	05:14:19
4	MR. CHEW: You give the basis --	05:14:21
5	MS. BREDEHOFT: You kept talking,	05:14:22
6	knowing I wasn't on. I think that's the most	05:14:23
7	unprofessional thing that -- well, it's not	05:14:25
8	the most unprofessional thing I've ever heard	05:14:28
9	of, but it's pretty outrageous.	05:14:30
10	We're still on the record.	05:14:34
11	MR. CHEW: We're off the record --	05:14:36
12	MS. BREDEHOFT: We are staying on the	05:14:36
13	record until we solve this issue of the	05:14:37
14	upload. I'm -- what --	05:14:39
15	MR. CHEW: There is no issue. You	05:14:41
16	didn't upload any exhibits because this was	05:14:43
17	all a sham.	05:14:45
18	MS. BREDEHOFT: No, it's not a sham at	05:14:46
19	all. And I -- I absolutely represented	05:14:48
20	correctly. And my client represented	05:14:50
21	correctly that she's not feeling well. You	05:14:53
22	can see visibly that she was getting very	05:14:55

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

269

1	tired.	05:14:58
2	MR. CHEW: I didn't question that. I	05:14:58
3	didn't question your client's representation.	05:14:59
4	I agreed with it. It's yours that I'm	05:15:01
5	questioning.	05:15:04
6	MS. BREDEHOFT: All right. We're	05:15:04
7	staying on the record until we solve this.	05:15:05
8	Lucien, can you check -- I just sent a	05:15:07
9	text to my paralegal, but we should be able	05:15:11
10	to -- this was definitely uploaded. It was	05:15:13
11	much earlier this morning. I absolutely	05:15:18
12	intended -- she uploaded it at 9:41 a.m.	05:15:20
13	REMOTE TECHNICIAN: And was that using a	05:15:25
14	Planet Depos repository?	05:15:27
15	MS. BREDEHOFT: The link came from	05:15:30
16	Jillian Barricelli.	05:15:31
17	REMOTE TECHNICIAN: Okay.	05:15:33
18	MS. BREDEHOFT: And the link was --	05:15:34
19	there's a lot of stuff here. Let's see.	05:15:39
20	REMOTE TECHNICIAN: Let me try. I'm	05:15:44
21	e-mailing her right now.	05:15:46
22	MS. BREDEHOFT: Thank you.	05:15:48

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

270

1	REMOTE TECHNICIAN: Do you have the	05:15:49
2	download link somewhere? That might be	05:15:49
3	quicker. But I'll try to e-mail her.	05:15:51
4	MS. BREDEHOFT: Do you -- you are	05:15:54
5	talking Greek to me. I am not the one	05:15:55
6	whoever did the uploading.	05:15:58
7	REMOTE TECHNICIAN: Okay.	05:16:01
8	MS. BREDEHOFT: But I have the e-mail	05:16:02
9	exchange where they gave the upload link.	05:16:03
10	REMOTE TECHNICIAN: Okay.	05:16:07
11	MS. BREDEHOFT: And then it was uploaded	05:16:08
12	at 9:41 a.m.	05:16:09
13	MR. CHEW: So my question is whether you	05:16:27
14	will agree to bring her back to finish the	05:16:28
15	deposition? Yes or no.	05:16:31
16	MS. BREDEHOFT: So if we were to bring	05:16:33
17	her back, I would take her deposition because	05:16:35
18	I'm entitled to three-and-a-half hours. You	05:16:38
19	know, we can certainly talk about it, but	05:16:42
20	right now, I don't know if she's having a	05:16:45
21	baby. Okay? I don't know what her	05:16:46
22	circumstances are. I know she's not feeling	05:16:49

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

• 271

1	well and she's extremely tired. I don't know	05:16:51
2	what her circumstances are, but I'm not going	05:16:54
3	to agree to definitely bring her back.	05:16:56
4	I don't know, are you bringing Jennifer	05:16:58
5	Howell back? Are you bringing Christian	05:17:00
6	Carino back?	05:17:02
7	MR. CHEW: I'll take that as a no.	05:17:04
8	MS. BREDEHOFT: If I brought her back, I	05:17:06
9	would take her deposition for	05:17:07
10	three-and-a-half hours, which is what I fully	05:17:08
11	planned to do.	05:17:11
12	MR. CHEW: All right. Well...	05:17:14
13	MS. BREDEHOFT: If you want me to do	05:17:17
14	that, we can explore what -- what are -- what	05:17:19
15	Whitney's health is and what her	05:17:23
16	circumstances are, and I can surely take 3.5	05:17:25
17	hours of deposition of her. If you want	05:17:29
18	that, we will agree to that. But I can't	05:17:30
19	tell you a date right now because I don't	05:17:33
20	know her circumstances. I'm genuinely	05:17:34
21	worried about her. I'm worried she's going	05:17:37
22	to have that baby.	05:17:40

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

272

1	MR. CHEW: That's why we excused her.	05:17:43
2	MS. BREDEHOFT: How are you doing,	05:17:47
3	Lucien?	05:17:48
4	REMOTE TECHNICIAN: I sent the e-mail	05:17:50
5	about a minute ago. I should hear back	05:17:51
6	shortly.	05:17:54
7	MS. BREDEHOFT: Thank you.	05:17:56
8	I have my exhibits right here. I have	05:18:28
9	my outline right here.	05:18:30
10	MR. CHEW: It's all beside the point at	05:18:36
11	any rate, so...	05:18:37
12	MS. BREDEHOFT: Why is it beside the	05:18:43
13	point?	05:18:44
14	MR. CHEW: Because we're entitled to	05:18:45
15	finish our examination of your witness.	05:18:46
16	MS. BREDEHOFT: No, you're -- you're --	05:18:49
17	you have three-and-a-half hours and you took	05:18:50
18	your -- you took a little more than	05:18:52
19	three-and-a-half hours, and I let you.	05:18:54
20	MR. CHEW: We get 7.	05:18:56
21	MS. BREDEHOFT: No, you don't get 7.	05:18:57
22	You made explicit representations and	05:18:58

CONFIDENTIAL
Transcript of Whitney Henriquez
• Conducted on February 3, 2022

273

1	agreement --	05:19:01
2	MR. CHEW: All right. Ms. Bredehft,	05:19:02
3	this is going -- this is going nowhere.	05:19:02
4	MS. BREDEHOFT: We're staying on the	05:19:05
5	record --	05:19:06
6	MR. CHEW: Why do we have to --	05:19:07
7	MS. BREDEHOFT: -- until we verify that	05:19:08
8	we uploaded the exhibits at 9:41 this	05:19:10
9	morning. I did not want the record to	05:19:13
10	falsely state that we did not upload.	05:19:17
11	REMOTE TECHNICIAN: I might as well call	05:19:40
12	at this point, so I'll just do that.	05:19:41
13	MS. BREDEHOFT: Okay.	05:19:43
14	(Pause in proceedings.)	05:20:38
15	REMOTE TECHNICIAN: I -- I see a	05:20:39
16	download link here, and it looks like I'm	05:20:41
17	seeing four exhibits.	05:20:45
18	MS. BREDEHOFT: Correct.	05:20:48
19	REMOTE TECHNICIAN: They were uploaded	05:20:49
20	at 9:38 a.m.	05:20:50
21	MS. BREDEHOFT: I was off by three	05:20:52
22	minutes.	05:20:53

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

274

1	Okay. Thank you very much, Lucien. I	05:20:54
2	appreciate it.	05:20:56
3	All right. We can go off the record.	05:20:57
4	MR. CHEW: Four exhibits?	05:20:59
5	MS. BREDEHOFT: Correct.	05:21:01
6	REMOTE TECHNICIAN: Yes.	05:21:02
7	MR. CHEW: Four exhibits doesn't usually	05:21:03
8	take three-and-a-half hours, but...	05:21:04
9	MS. BREDEHOFT: You -- I was going to --	05:21:07
10	I will represent I fully intended to take	05:21:09
11	three-and-a-half hours. And you don't know	05:21:12
12	what those exhibits are and you don't know	05:21:15
13	how lengthy they are.	05:21:16
14	MR. CHEW: Why didn't you send them to	05:21:18
15	us?	05:21:19
16	MS. BREDEHOFT: Because I don't have to	05:21:20
17	send them to you and I'm not going to reveal	05:21:21
18	my work product to you.	05:21:23
19	MR. CHEW: Okay. All right. Well,	05:21:24
20	we'll see you at the emergency motion.	05:21:25
21	MS. BREDEHOFT: You better not -- you've	05:21:27
22	got to go to California on this one. This is	05:21:29

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

275

1	Judge Bowick, who is the one who's ruling on	05:21:32
2	these, so you have to talk to Michael about	05:21:34
3	that.	05:21:36
4	MR. CHEW: I think it's Judge Bowick, I	05:21:37
5	think that's how you pronounce it.	05:21:38
6	MS. BREDEHOFT: You're right. You're	05:21:39
7	right. My apologies. I pronounced that	05:21:40
8	incorrectly. All right.	05:21:41
9	MR. CHEW: It's also Presiado.	05:21:42
10	MS. BREDEHOFT: Have a great day,	05:21:45
11	everyone.	05:21:45
12	MR. CHEW: You, too.	05:21:46
13	MS. BREDEHOFT: Are we off the record?	05:21:52
14	THE COURT REPORTER: Yes, ma'am.	05:21:57
15	Can I please get your orders?	05:21:58
16	Does anybody need a rough, I guess is	05:21:58
17	the question?	05:21:58
18	MS. VASQUEZ: We got a rush.	05:21:58
19	MR. CHEW: Yeah, we need a rush. Yeah,	05:22:00
20	we definitely need a rush for probably the	05:22:01
21	whole thing.	05:22:05
22	THE COURT REPORTER: Okay.	05:22:07

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

276

1	And Ms. Bredehft, did you want the	05:22:08
2	office to be in touch or did you want to let	05:22:13
3	me know at this time?	05:22:15
4	MS. BREDEHOFT: We'll just take a copy	05:22:17
5	whenever theirs is ready.	05:22:18
6	THE COURT REPORTER: Okay. Thank you.	05:22:20
7	And, Elaine, I did want to let you know,	05:22:20
8	as I was speaking with Camille and Ben, that	05:22:20
9	as an officer of the court, if somebody --	05:22:20
10	counsel wants to stay on record, it is my job	05:22:20
11	to keep your guys's record open. It's your	05:22:20
12	record, not -- I'm just facilitating it.	05:22:20
13	So you know, from the moment you hung	05:22:20
14	up, the entire exchange is on the record. We	05:22:20
15	did go off the video record, and so -- I	05:22:20
16	apologize on behalf of Kim for that. But I	05:22:20
17	just want to be clear that I'm the neutral	05:22:20
18	party here and it is my job to ensure that	05:22:20
19	both parties have access to the record.	05:22:20
20	MS. BREDEHOFT: Yeah, and I appreciate	
21	that. I thought that we were off the record	
22	and that's why I left. I would not have left	

1 if I thought we were still on the record.

2 Okay. Thank you.

3 THE COURT REPORTER: I wish everybody a
4 good night. Thank you for having us.

5

6

7 AND FURTHER THIS DEPONENT SAITH NOT.

8 SIGNATURE RIGHTS RESERVED.

9 (Videotaped Deposition concluded at 5:22 p.m.)

10

11 * * * * *

12

13

14

15

16

17

18

19

20

21

22

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

278

1 STATE OF NORTH CAROLINA:

2 COUNTY OF MECKLENBURG :


3 I, April Reid, Court Reporter and Notary
4 Public in and for the State of North Carolina,
5 and whose commission expires March 4, 2025,
6 do certify that the aforementioned appeared
7 before me, was sworn by me, and was thereupon
8 examined by counsel; and that the foregoing is a
9 true, correct, and full transcript of the
10 testimony adduced.

11 I further certify that I am neither
12 related to nor associated with any counsel or
13 party to this proceeding, nor otherwise interested
14 in the event thereof.

15 Given under my hand and notarial seal in
16 Charlotte, North Carolina, this 5th day of
17 February, 2022.

18

19

20 
April Reid, CRR, CRR, Notary Public

21 State of North Carolina, County of Mecklenburg

22 Notary Registration No. 20012210079

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

279

A	229:13	62:2, 67:8,	after
abercrombie	abused	71:11, 72:6,	13:7, 15:9,
82:8	56:19, 58:21	83:16, 91:18,	74:7, 74:12,
ability	abuser	107:6, 118:4,	74:15, 76:10,
11:15, 101:15	229:16, 230:18	120:5, 123:16,	78:14, 78:22,
able	abuses	128:5, 129:21,	80:15, 81:1,
21:17, 28:7,	58:9	131:4, 131:6,	95:7, 115:19,
29:5, 31:21,	abusive	132:8, 132:21,	117:6, 119:12,
33:1, 40:6,	108:14	135:20, 150:14,	133:4, 145:18,
56:8, 58:16,	academic	167:6, 174:8,	145:19, 152:5,
60:12, 68:16,	84:1	177:20, 187:10,	161:18, 162:4,
76:13, 82:10,	access	187:11, 189:7,	176:1, 177:11,
84:22, 87:1,	276:19	195:21, 212:13,	178:6, 185:6,
114:17, 130:12,	accident	219:13, 232:12,	186:15, 196:22,
143:3, 160:15,	70:21, 73:4,	236:15, 238:9,	199:4, 204:6,
188:11, 189:5,	75:15, 76:11,	240:19, 243:9,	207:8, 210:1,
189:19, 269:9	76:14, 77:3,	248:16	210:2, 210:3,
above	168:18	adderall	210:4, 210:10,
168:19	accurate	123:22, 124:5,	218:2, 223:22,
abruptly	33:3, 34:3,	124:9	241:1, 241:5,
9:10	184:14, 256:16	addicted	241:9, 242:20,
absolute	accurately	115:20	243:7, 243:12,
260:10	11:16, 22:10,	addition	243:16, 247:15,
absolutely	27:2, 266:8	194:2, 256:3	252:7, 255:21
44:3, 48:12,	accusation	address	afternoon
89:20, 89:22,	91:3, 96:2,	9:2, 111:20,	7:21
92:10, 96:2,	97:10	111:22	afterward
132:17, 170:1,	accused	addressed	241:3
200:18, 236:5,	89:18, 90:7,	23:2	again
243:6, 246:3,	91:1	adduced	21:7, 29:1,
256:2, 256:17,	accusing	278:10	31:10, 34:6,
257:21, 264:11,	90:18	adjoining	41:5, 49:19,
265:12, 265:13,	acknowledge	173:21, 210:16	69:3, 83:4,
267:3, 268:19,	256:12	administered	85:1, 88:7,
269:11	action	203:14	90:21, 93:8,
absurd	1:6, 14:13,	advice	94:3, 96:4,
265:18	15:2, 15:4,	28:14	99:15, 107:16,
absurdity	16:6, 18:16,	advised	117:5, 125:7,
251:16	20:1, 20:4,	254:4	131:9, 132:14,
abuse	21:1, 22:19,	affair	138:14, 140:10,
43:11, 57:4,	23:11, 34:3,	236:18, 237:2	150:12, 152:21,
58:4, 59:6,	129:20	affect	153:9, 153:19,
59:17, 60:2,	actions	11:15, 11:19	161:12, 161:20,
60:15, 61:3,	22:10	affectionate	161:22, 162:15,
61:9, 61:20,	actual	104:15	163:9, 177:3,
108:16, 108:17,	30:17, 129:20,	affirmed	182:3, 185:16,
216:11, 226:17,	196:9	8:12	187:5, 187:12,
	actually	aforementioned	189:17, 191:8,
	26:3, 35:9,	278:6	

CONFIDENTIAL

Transcript of Whitney Henriquez

Conducted on February 3, 2022

280

191:11, 204:10, 206:1, 212:3, 228:1, 229:20, 229:22, 230:9, 235:15, 238:20, 239:15, 243:8, 244:12, 246:2, 246:4, 260:14 against 14:20, 54:8, 54:11, 232:19, 233:5 age 48:2, 57:21, 62:10, 78:15, 79:15, 237:11, 238:14 agent 252:3 ago 27:11, 41:16, 65:20, 246:5, 272:5 agree 61:2, 245:15, 251:12, 256:17, 258:13, 259:19, 260:4, 260:11, 270:14, 271:3, 271:18 agreed 99:14, 267:17, 269:4 agreement 264:12, 273:1 agrees 252:18 ah 228:5 ahold 201:19 aiming 174:7, 174:9 air 99:1 alcohol 58:14, 58:19, 58:21, 59:7,	59:17, 60:15, 60:21, 61:13, 61:20, 62:9, 62:16, 63:1, 207:15 alive 36:2 all 2:2, 7:19, 9:20, 18:4, 21:14, 37:14, 37:21, 65:14, 83:10, 84:15, 91:20, 95:19, 100:22, 104:20, 105:8, 107:4, 107:19, 108:9, 119:2, 124:21, 146:16, 146:19, 166:15, 172:5, 172:19, 176:13, 194:12, 197:13, 203:17, 204:3, 204:16, 204:17, 207:19, 211:11, 211:12, 217:2, 230:18, 238:22, 241:12, 241:16, 248:8, 251:22, 254:6, 254:11, 255:13, 260:17, 263:6, 263:17, 263:19, 266:5, 268:17, 268:19, 269:6, 271:12, 272:10, 273:2, 274:3, 274:19, 275:8 allegations 225:10 allege 242:21 alleged 108:17, 128:16, 166:2, 186:15, 229:16 allegedly 126:13, 127:16,	164:3, 169:15, 173:16, 174:12, 178:18, 179:1, 229:13 alleges 251:7 allotment 203:19, 205:14 allotted 254:15 allow 111:5 allowance 82:5 allowed 107:14, 251:1 almost 201:21, 211:12 alone 79:2, 267:17 along 160:4, 160:8, 255:12 already 15:15, 83:14, 115:18, 117:5, 130:6, 230:13, 231:5, 233:16, 234:2 alright 228:10 also 4:3, 12:6, 12:9, 14:12, 15:21, 19:9, 19:15, 26:16, 27:17, 31:18, 31:22, 32:12, 33:14, 37:1, 39:18, 53:3, 60:15, 67:5, 70:6, 92:6, 96:20, 103:21, 106:13, 152:6, 154:14, 170:9, 175:20, 195:11, 195:20, 213:1, 219:1, 226:14,	229:6, 230:4, 230:10, 235:22, 248:5, 254:17, 275:9 altercation 131:7 altercations 144:18 altogether 162:17 always 9:18, 112:22, 151:14, 243:11 amber's 67:22, 70:17, 74:14, 75:1, 126:13, 127:16, 147:2, 151:20, 152:7, 160:5, 201:8, 217:20, 236:14 amendment 29:11 amount 62:5 amused 158:2 angeles 9:3, 78:20, 78:22, 79:15, 81:7, 81:9, 81:15, 84:14, 166:3, 168:9 angle 177:7, 189:4 angry 113:8, 113:12 another 36:22, 41:3, 66:20, 85:1, 86:15, 89:22, 99:11, 152:6, 153:20, 163:20, 176:6, 176:16, 186:8, 212:19, 218:9, 220:15, 220:16, 226:10, 229:8, 230:8,
---	--	---	---

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

37284

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

281

241:5, 246:20, 247:5, 247:20, 263:10 answer 10:1, 12:3, 12:15, 12:16, 12:17, 12:19, 12:20, 14:5, 16:22, 17:2, 17:9, 17:11, 17:21, 18:2, 18:6, 18:7, 18:14, 20:16, 20:18, 21:6, 21:13, 21:22, 26:18, 28:6, 28:8, 28:13, 29:2, 29:4, 29:5, 29:8, 32:3, 32:4, 32:15, 32:18, 33:17, 33:18, 34:11, 34:13, 34:14, 34:15, 68:7, 71:5, 102:7, 106:21, 107:13, 110:12, 111:7, 128:1, 150:8, 160:2, 205:8, 206:17, 222:22, 224:9, 224:21, 232:1, 245:2 answered 13:7, 33:17, 73:19, 75:18, 204:20, 248:2 answering 206:9 anticipate 221:10 anticipated 23:8 anxiety 98:18 any 11:14, 11:18, 14:3, 16:17,	17:1, 17:4, 17:7, 17:13, 17:14, 17:19, 18:1, 22:2, 22:3, 22:19, 28:20, 29:10, 29:11, 31:13, 32:13, 37:5, 37:6, 38:11, 43:7, 43:10, 49:22, 54:2, 56:9, 57:3, 57:17, 57:18, 58:2, 58:4, 58:9, 58:16, 60:12, 61:3, 69:21, 85:13, 85:17, 94:6, 94:7, 94:8, 98:2, 106:21, 113:19, 118:11, 119:10, 120:20, 121:6, 123:15, 124:8, 124:14, 131:7, 137:4, 144:17, 146:6, 149:22, 150:3, 161:7, 178:5, 185:11, 185:12, 195:18, 196:2, 197:21, 197:22, 198:13, 199:3, 201:20, 204:12, 207:14, 211:15, 216:17, 216:19, 220:17, 220:18, 224:11, 224:13, 231:4, 233:5, 233:15, 234:1, 234:13, 251:8, 252:7, 255:12, 256:20, 257:1, 260:22, 262:21, 263:1, 268:16, 272:11, 278:12 anybody 10:16, 96:16, 173:4, 173:9,	174:7, 201:22, 244:16, 264:1, 275:16 anymore 103:3 anyone 13:19, 22:8, 22:17, 36:5, 36:13, 43:11, 206:4, 208:8 anything 15:18, 16:4, 16:11, 16:21, 44:19, 45:3, 57:20, 61:14, 62:6, 64:19, 69:6, 75:15, 85:9, 86:5, 90:22, 96:15, 96:16, 125:22, 130:15, 140:19, 147:4, 172:13, 172:17, 172:19, 173:9, 173:14, 177:16, 178:7, 204:5, 206:2, 207:4, 207:18, 210:5, 210:17, 211:3, 212:15, 220:20, 230:9, 230:15, 233:13, 240:10, 260:11, 261:2, 261:16, 264:7 anyway 12:18, 85:2 apart 20:18, 23:5, 37:3, 39:10, 57:22, 58:1, 195:19, 208:13 apartment 10:9, 81:7, 126:13, 127:16, 128:7, 133:15, 134:1, 134:8, 167:5, 171:3, 210:4, 210:10	apologies 67:20, 83:14, 159:8, 205:4, 275:7 apologize 37:10, 46:19, 48:4, 137:22, 173:1, 276:16 apparently 265:2 appear 19:14, 133:14 appeared 2:2, 138:6, 138:14, 138:15, 195:21, 278:6 appears 141:19, 148:5, 151:2, 151:3 applicator 122:18, 123:7, 149:14, 149:16 appreciate 10:5, 11:5, 188:15, 222:9, 264:10, 266:20, 266:22, 267:9, 274:2, 276:20 appropriate 261:6 approximately 77:22 april 1:22, 7:12, 42:2, 217:19, 219:2, 220:18, 221:17, 240:6, 247:12, 278:3, 278:20 area 175:14, 175:20 aren't 244:2 argue 84:21, 85:3 arguing 85:9 argument 86:16, 88:2,
--	--	---	--

CONFIDENTIAL

Transcript of Whitney Henriquez

Conducted on February 3, 2022

282

105:19, 112:9, 169:14, 223:22, 243:8 arguments 84:8, 84:15, 85:13, 110:17, 113:5, 225:19 arisen 224:11 arm 181:18, 183:10, 183:15, 183:18, 183:20, 184:3, 184:6, 184:13, 185:21, 186:8 arm's 176:15, 176:18 around 104:6, 130:4, 174:17, 184:6, 201:22, 203:13, 220:14, 249:10 arrived 136:20, 138:21, 151:18, 218:2, 219:20 art 212:21 artwork 211:8 aside 31:12, 62:22, 87:3, 89:3, 119:16, 197:3 asked 14:4, 32:7, 33:16, 48:5, 73:19, 75:18, 113:16, 155:3, 204:17, 204:20, 204:22, 205:1, 205:2, 226:22, 227:2, 246:11, 246:13, 248:2, 250:10, 255:22 asking 17:13, 21:7, 21:9, 28:18,	28:19, 60:21, 107:4, 107:11, 107:15, 123:21, 124:5, 124:9, 167:21, 194:1, 245:22, 252:15 asleep 202:15, 208:7 aspect 25:21 aspects 26:17 ass 162:8 assault 146:5, 243:1 assistance 20:19 assistant 231:16, 231:17, 231:19 assisted 20:21 associated 278:12 assume 12:22, 133:13, 254:14 assumes 167:1 assuming 105:19, 178:19, 178:20 attached 24:2, 101:7, 106:12, 125:6, 131:16, 147:14, 154:7, 163:3, 199:19, 221:6, 227:7, 239:5, 247:2 attack 231:3, 231:10 attempt 199:4 attempted 153:20 attending 80:20, 83:4,	217:20 attention 108:22, 139:9, 140:16, 181:7 attorney 8:1, 12:9, 17:15, 21:9, 33:5, 265:18 attorney-client 16:20, 17:8, 17:19, 18:12, 20:14, 21:3, 21:11, 29:3, 32:1, 32:13, 33:15, 34:9 attorneys 13:19, 17:20 attribute 25:8, 138:17 attributed 137:15, 138:9 austin 80:20 australia 192:12, 193:2 australian 213:9 authenticating 255:16 authorities 213:9 average 55:18, 55:20, 55:22 avoid 112:1 avoidance 254:4 aware 9:12, 137:13, 193:1, 237:22 away 70:20, 71:18, 71:19, 72:8, 72:20, 73:4, 73:17, 74:1, 74:8, 74:15, 104:20, 105:8,	109:7, 110:20, 111:11, 111:19, 111:21, 112:1, 112:2, 112:17, 113:2, 176:11, 177:9 awful 164:12 awhile 180:3 azcarate 260:6 <hr/> B <hr/> baby 258:17, 270:21, 271:22 baby's 259:4 back 10:22, 13:4, 26:10, 76:15, 83:13, 83:17, 84:3, 84:4, 91:20, 92:17, 95:19, 100:11, 102:22, 136:21, 137:4, 143:10, 143:15, 143:21, 145:18, 151:16, 155:20, 162:3, 168:5, 175:13, 175:15, 176:8, 176:11, 176:21, 177:4, 177:8, 180:10, 180:17, 180:21, 180:22, 181:1, 181:12, 182:7, 182:21, 184:5, 186:20, 188:16, 190:9, 194:17, 200:9, 244:20, 244:21, 245:17, 253:19, 259:13, 259:20, 260:16, 261:1, 262:11, 264:22, 265:1, 265:5,
---	---	---	--

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

37286

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

283

270:14, 270:17, 271:3, 271:5, 271:6, 271:8, 272:5 background 150:18 backwards 48:5, 180:11, 180:19 bacon 3:17 bad 43:8, 56:7, 97:7, 229:7, 230:8, 231:2 bag 148:15 ballpark 31:3, 31:10, 118:18, 118:21 bar 234:17, 234:21, 235:5, 235:11 barricelli 269:16 baruch 220:9 based 96:9 basically 95:18, 139:5, 211:11 basis 28:9, 32:15, 36:11, 36:14, 260:10, 267:16, 267:17, 268:1, 268:4 bates 5:11, 5:12, 5:16, 5:18, 5:20, 5:22, 6:3, 6:5, 6:7, 6:9, 6:11, 101:5, 132:1, 147:16, 154:11, 163:9, 220:22 bearing 220:22	bears 147:16 became 68:12, 71:13, 104:11, 120:13 because 12:1, 12:7, 18:5, 21:3, 59:13, 60:10, 82:17, 83:4, 86:8, 92:15, 96:19, 102:22, 107:4, 107:10, 111:6, 111:21, 132:2, 150:9, 155:20, 159:3, 162:15, 165:4, 168:17, 169:14, 177:7, 178:19, 182:5, 182:19, 183:7, 184:8, 187:11, 192:11, 203:2, 204:10, 206:1, 206:14, 214:8, 216:20, 218:2, 218:19, 223:8, 224:4, 224:12, 226:1, 226:11, 230:17, 254:19, 256:2, 258:16, 260:10, 260:20, 262:9, 268:16, 270:17, 271:19, 272:14, 274:16 bed 170:10 bedroom 164:2, 173:20 bedrooms 172:9 been 11:8, 31:2, 76:11, 76:18, 84:7, 85:15, 86:15, 88:3, 94:3, 95:22, 96:20, 102:20,	109:5, 110:14, 110:17, 112:8, 115:19, 117:6, 118:19, 119:22, 121:22, 123:22, 124:15, 125:3, 134:7, 137:14, 141:7, 143:19, 146:3, 146:17, 149:4, 149:6, 149:20, 152:5, 152:8, 153:20, 153:21, 154:4, 169:15, 174:18, 176:15, 178:8, 180:4, 188:10, 189:5, 189:14, 189:19, 195:12, 195:21, 198:19, 199:13, 203:19, 205:14, 209:12, 220:3, 221:22, 223:21, 224:7, 225:21, 229:9, 230:13, 230:15, 241:16, 242:14, 250:5, 252:4, 256:4, 256:21, 258:7, 262:21 before 9:6, 11:9, 74:19, 74:21, 82:2, 84:20, 100:14, 102:7, 106:21, 107:13, 110:11, 110:18, 113:14, 123:1, 123:8, 128:17, 147:20, 149:21, 162:15, 172:17, 173:19, 182:2, 190:3, 190:4, 200:13, 204:8, 204:11, 206:2, 208:14, 209:9, 210:22, 219:4, 220:4, 220:13, 225:8, 229:9,	230:14, 238:3, 238:15, 254:1, 259:21, 260:3, 260:9, 278:7 beg 231:18 begin 236:19 beginning 129:11, 155:20 begins 7:2 behalf 2:6, 3:3, 3:11, 7:14, 18:19, 19:4, 19:16, 276:16 behest 246:17 behind 177:6, 195:3, 211:1 being 7:10, 8:12, 14:11, 32:6, 98:19, 98:20, 108:14, 137:15, 177:11, 180:16, 181:1, 181:12, 188:5, 194:13, 195:10, 230:11, 260:13 belief 94:15 believe 13:14, 21:10, 23:3, 37:11, 54:20, 68:10, 70:18, 72:5, 74:19, 74:20, 80:9, 90:12, 97:22, 109:5, 118:10, 129:8, 130:17, 149:10, 161:6, 161:19, 175:21, 204:22, 232:12, 234:18, 243:7, 251:8,
---	--	--	---

CONFIDENTIAL

Transcript of Whitney Henriquez

Conducted on February 3, 2022

284

251:11 believed 90:10, 96:8 below 135:3 belt 45:8, 46:2, 47:6, 47:7, 47:20, 48:8, 48:14, 49:2, 51:6, 51:12, 54:2, 59:19, 60:17 belts 44:3, 44:18, 44:19, 45:3 ben 7:17, 8:20, 9:4, 163:8, 168:15, 184:14, 190:3, 201:1, 250:8, 251:21, 257:10, 276:8 ben's 257:12 benefit 154:10, 199:15 benjamin 2:8 berg 236:13, 236:19, 237:12 beside 272:10, 272:12 best 32:21, 34:4, 74:5, 89:9, 95:14, 174:11, 197:20, 219:11 better 26:21, 83:13, 83:14, 110:9, 165:6, 259:2, 259:21, 260:15, 260:16, 274:21 between 56:1, 69:21, 86:19, 87:6,	102:1, 105:21, 106:14, 131:7, 131:19, 132:12, 132:21, 154:9, 154:21, 200:14, 225:19, 226:2, 227:10, 230:15, 239:10, 247:5 beyond 85:11 big 56:11, 139:3 bigger 56:15 biological 39:2 birth 41:20, 255:11, 257:1 birthday 217:18, 217:20, 249:2, 249:11 bit 34:19, 42:9, 60:9, 84:6, 168:16, 188:16, 203:1 bitch 248:7, 248:17 blah 88:20, 88:21 bleeding 196:2 blind 221:15 blocking 180:21 blue 239:21 body 47:6, 50:1, 52:19, 53:4, 184:3, 198:1, 226:18 boerum 200:15, 201:8, 201:10, 208:19, 212:5, 212:15	boerum's 201:17 book 157:10 booze 139:5 borrowed 85:8 boss 212:21 both 7:13, 8:3, 35:3, 43:9, 70:19, 88:5, 92:18, 137:3, 159:4, 173:12, 181:3, 182:6, 203:12, 224:6, 226:12, 241:10, 244:14, 246:12, 247:10, 264:12, 276:19 bottle 139:5 bottom 47:14, 49:18, 49:21, 53:2, 138:18 bouts 59:11 bowick 275:1, 275:4 box 148:6, 201:6, 239:19, 239:21 boyfriend 79:9, 230:12 brawl 220:16 break 9:19, 9:21, 10:2, 10:3, 13:5, 83:9, 84:2, 100:1, 100:4, 160:9, 160:10, 199:22, 200:2, 210:5, 210:17, 224:16,	252:10, 252:11, 252:20, 255:6 breakfast 138:22, 139:3, 139:8, 148:5 breaks 9:9, 39:12, 84:2 bredehoft's 154:10, 199:14 brief 36:20, 37:2, 234:14 briefly 19:21, 137:17 bring 102:21, 229:14, 259:20, 270:14, 270:16, 271:3 bringing 271:4, 271:5 broad 32:5, 85:1 broaden 84:5 broadening 64:5, 85:11 broke 161:1, 161:8, 208:20, 211:14 broken 53:18, 211:2, 211:9 brother 240:8 brother-in-law 8:21, 91:2, 157:18 brought 96:5, 271:8 brown 2:9, 2:17, 3:6, 3:16 bruises 211:15, 220:17 bruising 196:2, 196:6 bubbles 156:2, 156:5
--	---	--	--

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

37288

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

285

building 92:13, 219:12 bull 173:16, 174:6, 174:13, 174:20, 175:4, 175:10, 176:1, 176:10, 176:20, 177:13, 177:22, 178:9, 178:16, 178:17, 178:20, 178:22, 211:10 bunch 211:7 burn 26:10, 152:13, 153:11, 164:4 burned 153:20 business 9:20, 234:13 butts 139:6	21:3, 26:16, 27:5, 27:17, 28:2, 28:10, 29:14, 31:6, 31:20, 31:22, 32:11, 33:4, 33:5, 33:12, 34:7, 34:9, 39:18, 56:4, 59:2, 66:11, 67:11, 74:17, 75:4, 76:6, 78:8, 79:17, 90:15, 91:6, 93:22, 94:17 calm 174:4, 177:19, 179:20 came 30:3, 75:1, 76:15, 78:19, 78:22, 90:20, 94:15, 120:3, 137:4, 152:5, 166:5, 169:10, 171:9, 172:11, 174:2, 238:3, 238:9, 238:14, 238:16, 261:1, 265:1, 269:15 camera 7:13 camille 2:15, 7:18, 255:22, 276:8 camper 248:7 can't 16:1, 16:10, 22:22, 30:3, 30:7, 30:14, 31:10, 32:5, 33:21, 36:20, 38:3, 38:4, 41:7, 45:12, 45:18, 45:19, 46:18, 46:21, 48:2, 48:3,	51:16, 52:13, 52:17, 63:5, 63:13, 64:18, 66:18, 69:1, 74:20, 77:1, 79:6, 79:7, 82:18, 85:8, 89:1, 105:18, 116:7, 117:7, 120:2, 121:6, 121:10, 122:7, 130:5, 130:6, 132:16, 133:22, 134:8, 134:16, 141:17, 150:8, 150:9, 159:4, 160:22, 161:21, 175:2, 181:7, 183:19, 187:20, 189:5, 191:2, 191:11, 192:6, 200:17, 212:3, 217:9, 217:10, 220:3, 220:7, 223:20, 225:3, 245:12, 246:11, 246:16, 249:6, 271:18 cannot 38:10 cans 211:10 capacity 34:17, 109:6 car 70:21, 73:4, 73:10, 75:22, 76:2, 143:5 care 159:15, 159:20, 261:7, 261:10, 263:20 cared 160:8 careful 24:16 carino 252:2, 254:18,	271:6 carino's 256:3 carolina 278:1, 278:4, 278:16, 278:21 carried 203:13 cartoon 104:9 case 7:6, 14:19, 18:20, 19:16, 108:16, 201:19, 250:6, 266:6 cast 191:2, 191:12, 191:14, 192:8, 192:11, 192:20, 192:21, 193:20, 195:11, 195:19, 196:9 casted 190:22, 191:18, 192:3, 192:5, 192:7, 193:20 categorize 43:6, 237:1 category 55:21 caused 89:11 ccp 254:16 cd 148:14 certain 60:4, 88:20, 112:15, 134:8, 136:11, 187:11, 203:16 certainly 270:19 certainty 56:9, 58:16, 60:12, 72:5, 74:20, 98:3, 119:10, 150:8
---	---	--	--

CONFIDENTIAL

Transcript of Whitney Henriquez

Conducted on February 3, 2022

286

certify 278:6, 278:11 change 23:9 changed 129:2, 131:3 characterize 40:18, 55:13 charles 3:13 charlotte 278:16 charlson 3:16 cheat 242:6 cheated 241:17, 243:9 cheating 169:15, 170:2 check 202:6, 266:12, 269:8 cherries 131:5, 164:12 chief 260:6 child 55:13 childhood 34:20, 42:12, 42:20, 46:3 children 57:16, 58:17 choice 112:15 chose 112:9 chosen 213:17 christi 143:7 christian 252:2, 254:18, 256:3, 271:5 chronological 180:8 cigarette 139:6, 148:7,	151:3 cigarettes 151:9, 151:15 circuit 1:2, 7:5 circumstances 256:10, 270:22, 271:2, 271:16, 271:20 cited 89:18 citing 96:19 city 8:22, 9:2, 78:19 civil 1:6 cl 7:6 cl- 1:7 claimed 91:19 claims 259:14 clarification 26:6, 161:13 clarified 27:9 clarify 143:16 classmates 68:10 clear 14:17, 15:1, 65:15, 74:22, 91:14, 99:1, 131:6, 146:4, 169:3, 178:15, 189:13, 192:2, 194:3, 224:9, 252:5, 261:20, 262:14, 276:17 cleared 153:1 clearly 77:4, 137:21,	230:5, 249:7, 250:21, 256:7, 262:9 client 13:11, 102:22, 108:17, 184:16, 199:16, 251:4, 255:5, 255:6, 260:19, 268:20 client's 251:4, 269:3 close 39:21, 40:4, 40:13, 40:19, 41:7, 57:21, 70:19, 76:12, 84:21, 86:15, 120:9, 120:13, 144:11, 176:13, 226:12, 262:3 closely 196:17, 198:18 closeness 40:5, 41:6 closer 54:21, 175:19, 175:21, 183:8 clothing 211:7, 211:12 coach 33:22, 108:5 coachella 219:2, 219:4, 219:10, 221:22, 222:13 coaching 33:21, 108:6 cocaine 64:17, 65:5, 65:6, 65:16, 66:2, 66:8, 114:11, 114:13, 115:10, 115:14, 115:20, 116:3, 117:14, 121:6, 121:9, 121:15, 122:2, 122:17, 122:18, 123:1,	123:8, 139:6, 141:7, 141:16, 148:5, 149:11, 150:3 cohen 3:16 coincide 59:17, 60:16 columbia 92:13 combination 89:15 come 39:11, 68:18, 69:7, 71:12, 76:13, 82:19, 93:15, 94:7, 120:4, 135:17, 173:19, 173:21, 202:14, 212:5, 237:17, 262:11 comes 95:19, 228:6 comfort 11:2 coming 41:18, 41:21, 167:4, 167:7, 172:14, 182:4, 196:22 comment 94:9 commentary 31:18 commission 278:5 common 84:21 commonplace 87:15 communicated 223:16 communicating 88:11, 99:14, 230:7 communication 16:20, 17:8, 20:14
--	--	---	--

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

287

communications 17:14, 18:1, 18:12, 21:4, 21:8, 21:11, 28:3, 28:7, 29:3, 32:1, 32:14, 33:15, 34:10, 86:18, 87:6, 87:18, 98:6, 98:13 company 148:14, 234:13, 258:4 competent 28:17 complete 33:3, 34:3, 259:7, 262:11, 262:16 completed 34:16, 254:22 completely 34:17, 91:14, 96:13 complicated 102:8 complies 148:10 complimenting 157:17 concerning 23:3 concerns 98:17 concluded 277:9 conclusion 28:10, 28:17, 29:7, 29:14, 30:4, 33:6, 34:8, 91:15 conclusions 28:3, 31:20, 32:11, 33:12 condition 9:17, 11:18 conducted 1:15	confidential 1:12, 10:22, 11:3 confirm 132:20, 242:13, 262:20 confirmed 150:13 confronted 226:16 confusing 30:5 connect 140:14 consider 120:9 consistent 199:2, 254:8 console 174:3 constant 60:3 constraints 22:2 consume 62:16, 63:1, 63:9, 64:11, 123:8, 207:18 cont'd 3:1, 4:1 contact 201:7, 202:1, 202:2, 224:12, 240:1 contained 27:1 context 107:13, 110:8, 111:6, 229:7, 230:1, 230:11 continue 153:7, 171:14, 255:2, 259:1 continuing 126:16, 167:10, 218:9 contributed 60:22	control 101:19, 148:9, 155:11, 155:13, 200:16, 200:20, 222:7, 239:15 conversation 16:1, 92:10, 93:11, 93:16, 93:19, 94:4, 94:21, 94:22, 95:5, 95:7, 95:10, 97:6, 99:1, 110:8, 111:5, 120:1, 212:17 conversations 245:7 convinced 91:10, 104:19, 105:7 copy 276:4 corrected 253:9 correction 27:11, 27:12, 27:13, 29:11 correctly 26:11, 27:7, 109:10, 109:17, 184:17, 202:19, 228:13, 240:12, 241:20, 242:8, 248:10, 251:1, 268:20, 268:21 couch 92:5 could 9:4, 12:3, 14:16, 34:17, 42:8, 67:7, 88:22, 93:10, 96:20, 98:22, 111:4, 125:2, 132:10, 137:17, 140:19, 141:2, 141:9, 141:20, 143:6, 168:15,	181:2, 195:22, 199:12, 202:2, 204:14, 243:11, 253:3, 259:3, 262:7 couldn't 40:3, 59:12, 66:6, 72:4, 84:19, 98:2, 119:14, 176:13, 190:21, 192:19, 236:11, 238:1, 238:21 counsel 7:15, 16:21, 18:1, 18:3, 18:6, 18:9, 20:20, 20:21, 28:4, 28:7, 252:17, 254:11, 254:13, 256:14, 258:6, 262:1, 263:21, 264:12, 276:10, 278:8, 278:12 counsel's 13:5, 28:14 counselor 226:1 counterclaim 1:6, 1:10, 2:7, 3:4, 3:11, 4:6, 4:9 county 1:2, 7:5, 278:2, 278:21 couple 23:1, 89:9, 211:7, 253:22 course 97:13, 97:15, 258:18 court 1:2, 7:5, 7:12, 8:5, 8:7, 8:16, 12:2, 12:7, 83:18, 159:3, 250:10, 251:11,
--	---	--	--

CONFIDENTIAL

Transcript of Whitney Henriquez
Conducted on February 3, 2022

288

252:10, 252:15, 252:17, 257:4, 257:17, 258:6, 260:9, 260:20, 261:18, 262:1, 262:10, 263:21, 264:11, 275:14, 275:22, 276:6, 276:9, 277:3, 278:3 crashing 210:13, 210:15 crazy 222:20, 223:2, 223:3 cross-designated 254:19 cross-examine 251:1 crossed 173:20 crr 278:20 crying 137:15, 166:5, 167:7, 169:11 cunado 157:11 currently 9:1, 11:14 cut 138:7, 203:2 cycle 224:1	23:15, 25:9, 30:13, 30:14, 88:20, 129:7, 130:14, 131:9, 146:13, 149:2, 150:11, 166:13, 202:3, 207:8, 222:1, 240:4, 247:12, 267:20, 271:19 dates 129:7, 131:11, 238:21, 243:6 dating 104:7 daughter 39:3, 41:21 david 3:14, 7:22, 36:3, 39:16, 43:20, 44:13, 52:3 day 24:6, 62:3, 62:5, 79:21, 136:15, 145:20, 146:3, 149:9, 207:19, 209:9, 209:13, 209:14, 209:16, 211:20, 219:2, 219:3, 219:10, 223:15, 245:9, 258:19, 275:10, 278:16 days 31:3, 87:16, 109:7, 110:21, 111:11, 196:22, 243:12, 247:15 de-designate 11:1 deal 111:16, 252:8, 261:17 dear 70:16 debbie 171:19, 171:20,	171:21, 173:3, 174:2, 174:8, 175:22, 208:13 debbie's 203:12 decision 255:14 deescalate 179:9, 179:16, 224:4 defaced 26:5, 131:1 defendant 1:6, 1:9, 2:7, 3:4, 3:11, 4:6, 4:8, 259:11 defendants 18:19, 19:16 definitely 169:4, 186:5, 231:10, 269:10, 271:3, 275:20 definitively 68:17 degrees 41:6 deny 90:21 dependent 88:1, 88:7 depending 226:10 depicted 150:4 deponent 277:7 depos 7:14, 269:14 deposed 11:9, 14:11 deposing 265:20 deposition 1:13, 2:1, 7:3, 7:10, 10:21, 13:3, 13:20, 14:9, 16:18, 17:16, 41:17,	129:11, 190:2, 253:5, 254:16, 254:18, 255:3, 255:18, 255:20, 256:1, 256:4, 256:11, 258:2, 258:21, 258:22, 259:7, 259:8, 259:17, 260:1, 261:14, 261:22, 262:12, 262:17, 262:21, 264:20, 265:14, 265:17, 267:2, 267:13, 267:18, 267:20, 270:15, 270:17, 271:9, 271:17, 277:9 depositions 254:6 depp's 124:8, 151:12, 156:1, 190:9, 192:10 describe 21:18, 42:3, 125:21, 126:12, 127:15, 137:17, 137:19, 181:11, 198:12 described 43:8, 57:5, 183:7, 184:15, 197:4, 197:15, 243:17 describing 182:9, 198:7 description 5:8, 6:2 desire 99:2 desk 175:20, 175:21 desperately 180:15, 182:3 despite 12:14, 194:13, 245:6
D			
daily 203:15, 203:19, 205:14 damaged 211:8 dan 14:21, 18:20 darker 156:2 darn 230:17 date 7:7, 23:3,			

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

289

destroyed 211:14	discovered 30:16, 169:14	140:3, 141:7, 172:10, 179:15, 181:13, 259:20, 272:2	drinking 140:10, 140:15
detail 33:1, 220:14	discovery 102:2, 260:3	domestic 161:6, 161:8	drive 2:18, 3:17, 75:22, 76:2, 76:15
details 31:14	discrepancies 23:1, 27:20, 30:17, 31:12	done 96:9, 117:8, 117:13, 120:20, 121:1, 121:7, 141:16, 157:4, 157:5, 187:6, 241:16	driven 146:17, 146:20
devastated 74:5	discrepancy 23:15, 27:22	door 173:21, 195:3, 210:22, 235:4	driver's 74:14, 75:2, 76:3, 76:10, 76:17
died 62:3, 72:3, 73:11, 75:16	discuss 15:10, 19:21	doubt 254:4	driving 73:10, 77:5
different 7:11, 26:5, 77:12, 87:10, 127:19, 130:22, 131:4, 153:8, 162:17, 258:4, 265:10	discussed 219:8	doubtless 12:10	drop 74:7
difficulty 107:6	discussing 41:20	down 12:2, 88:22, 141:18, 171:9, 173:19, 173:21, 174:4, 177:19, 179:20, 203:1, 211:13, 214:19, 215:13, 222:7, 227:16, 239:16	dropped 143:5, 146:2
digging 91:16	discussions 254:13	download 263:2, 265:8, 270:2, 273:16	drove 143:5
dining 139:2	dishes 211:9	downstairs 172:3	drug 63:9, 113:16, 114:4
dinner 231:16, 232:3	disheveled 198:21	downtown 143:9, 143:21	drugs 63:19, 63:20, 64:10, 113:20, 117:9, 118:6, 118:12, 120:21, 121:1, 121:7, 123:15, 124:14, 207:15
directed 236:16	distance 189:4, 189:18	dr 203:20	drunk 62:3
directing 108:21, 139:9, 140:16	doctor 255:9, 255:10	drafting 22:3	dubbed 162:18
direction 16:21, 182:15	doctor's 256:14	drawn 91:15	dudes 241:16
directions 17:8	document 101:12, 108:22, 125:15, 126:1, 126:2, 220:21, 222:10	drew 208:14	due 86:16, 256:20
directly 91:22	documentary 128:18	drink 60:11, 61:20	duly 8:12
director 236:14, 237:18	documents 16:17, 17:1, 99:22, 100:3, 100:15, 113:15, 199:15, 246:20		dumbest 241:15
disagree 18:5, 231:1, 244:9, 250:21	dogs 213:10		duration 60:13, 87:4, 244:8
disagreement 86:9, 86:16	doing 9:20, 14:2, 90:11, 138:20,		during 46:2, 76:2,
discipline 44:5			
disclose 17:13			

CONFIDENTIAL

Transcript of Whitney Henriquez
Conducted on February 3, 2022

290

120:7, 148:21, 255:6 dwelling 45:21 dynamic 43:4, 43:7	effing 210:14 efforts 179:21 either 58:3, 62:8, 88:5, 95:19, 131:10, 135:1, 142:11, 160:14, 161:12, 191:15, 208:17, 242:6, 267:2 elaborate 256:19 elaine 3:13, 7:22, 9:14, 11:6, 102:19, 107:17, 164:19, 253:6, 257:22, 258:20, 259:22, 261:21, 264:19, 265:17, 276:7 else 10:16, 13:9, 13:19, 43:6, 61:14, 64:19, 122:15, 126:1, 130:15, 137:19, 149:5, 173:5, 173:9, 181:11, 206:4, 206:18, 208:8, 233:13, 244:16, 259:5 elysium 212:22 embarrassing 241:14 embarrassingly 82:8 emergency 260:5, 260:10, 262:10, 274:20 emotion 187:9 empty 139:5 end 97:1, 97:6,	158:10, 167:8, 213:17, 214:8, 216:5, 223:7, 245:9, 259:21, 260:3 ended 96:19, 238:2, 267:19 endured 216:11 engaged 225:8 engagement 225:15 enlarge 107:10 enough 214:5, 224:8, 252:11, 252:14 ensure 264:6, 276:18 entered 13:2, 190:1, 259:22, 264:19 entire 46:3, 85:14, 108:10, 138:2, 216:11, 258:8, 276:14 entirely 153:21 entirety 64:3, 244:11 entitled 132:17, 251:9, 254:5, 254:19, 259:7, 259:16, 262:16, 270:18, 272:14 epiphany 30:8 equal 254:5 erin 200:15, 201:7, 201:8, 201:10, 201:17, 203:12, 208:19, 212:5	errors 31:4 escort 235:22 especially 85:10, 188:20, 189:9, 189:16, 189:20 esq 2:8, 2:15, 2:16, 3:5, 3:13, 3:14, 190:1, 258:20, 259:22, 261:21, 264:19 est 1:17 established 229:9, 230:14, 243:9 establishment 234:9, 234:11, 234:13 estranged 88:11 even 9:17, 10:3, 70:3, 93:13, 177:3, 185:19, 204:5, 223:14, 232:22, 243:8, 245:14, 245:15, 252:6, 257:22, 268:2 evening 212:6, 212:16, 215:14 event 278:14 events 219:3, 249:20 eventually 82:7, 98:21 ever 11:8, 22:8, 22:17, 37:5, 39:5, 49:22, 51:6, 52:3, 53:10, 54:1,
E e-mail 247:10, 254:3, 254:11, 270:3, 270:8, 272:4 e-mailing 269:21 e-mails 132:7 each 12:7, 15:7, 133:9, 155:10, 176:18, 213:16, 244:13, 254:15 earlier 117:19, 162:16, 230:1, 269:11 early 137:12 earned 157:10 earshot 93:19 earth 251:6 easier 112:12 easily 93:10 eastern 7:9, 92:12 ecb 92:18, 166:3, 166:17, 170:16, 208:8, 212:5, 219:12 educational 82:3 edward 251:17 effect 170:3			

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

37294

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

291

56:18, 57:3, 57:10, 62:9, 64:20, 66:14, 68:18, 69:14, 69:20, 72:13, 72:19, 73:9, 75:22, 76:2, 77:5, 80:1, 82:19, 82:20, 85:15, 85:17, 112:21, 113:3, 113:19, 114:11, 115:20, 116:8, 116:13, 117:8, 117:14, 117:21, 120:20, 121:14, 123:15, 124:8, 124:14, 144:17, 145:11, 147:19, 160:3, 204:4, 206:20, 207:4, 207:6, 214:18, 215:3, 215:5, 231:3, 233:14, 233:22, 234:8, 234:12, 235:17, 241:12, 241:16, 251:7, 259:15, 268:8 every 16:1, 32:22, 79:21, 127:6, 250:4 everybody 252:18, 277:3 everyone 171:7, 180:4, 275:11 everything 9:10, 12:2, 32:8, 89:21, 197:4, 197:15, 204:14, 210:3, 210:16, 225:20, 229:5, 248:9, 256:18, 259:5 everywhere 139:7	evidence 26:7, 26:8, 167:1, 251:3 ex 151:20 exact 9:2, 30:14 exactly 24:9, 30:3, 32:7, 32:20, 130:7, 188:18, 188:19, 223:20, 263:12 examination 5:5, 8:17, 262:6, 272:15 examine 196:18, 198:18, 198:21, 199:4, 251:10 examined 8:14, 278:8 examining 212:4 example 84:13 excess 61:20, 62:4 exchange 134:10, 270:9, 276:14 exclamation 162:6, 162:7, 162:8, 164:11, 164:13, 241:18 excuse 205:5, 258:18 excused 257:15, 267:18, 272:1 exhausted 202:13 exhibit 5:9, 5:11, 5:12, 5:14, 5:16, 5:18, 5:20, 5:22, 6:3, 6:5, 6:7, 6:9,	6:11, 23:22, 24:1, 24:9, 101:2, 101:6, 101:8, 106:8, 106:11, 108:10, 109:1, 125:3, 125:5, 129:13, 131:13, 131:15, 131:21, 139:10, 147:10, 147:13, 147:17, 150:4, 154:5, 154:6, 154:20, 157:4, 162:4, 162:21, 163:2, 163:6, 168:6, 168:8, 199:13, 199:18, 200:13, 221:1, 221:5, 221:8, 226:15, 227:4, 227:6, 239:1, 239:4, 239:6, 240:7, 246:7, 246:19, 247:1, 247:16 exhibits 255:4, 262:21, 263:2, 265:4, 265:9, 265:12, 265:13, 266:3, 266:9, 268:16, 272:8, 273:8, 273:17, 274:4, 274:7, 274:12 exited 258:20, 261:13, 261:21 expedite 261:17, 262:8 expedited 260:8, 262:5 experience 21:18, 43:10, 65:13, 113:4 experienced 15:15 experiences 22:11	expertise 59:3 expires 278:5 explain 24:18, 176:3 explaining 206:12 explicit 272:22 explicitly 12:19 explore 271:14 express 91:11 expressing 245:8 expressly 254:7 extended 39:13, 99:13 extensive 87:13 extent 16:19, 17:7, 17:10, 17:18, 18:11, 20:13, 28:2, 29:2, 31:22, 32:12, 32:17, 33:14, 34:9, 225:20, 229:5, 229:20 extremely 217:13, 271:1 eyes 241:13 <hr/> F <hr/> face 50:10, 50:11, 53:10, 53:14, 53:16, 53:18, 53:22, 104:19, 105:7, 111:17, 137:10, 137:16, 137:20, 138:2, 138:4, 138:11,
--	---	--	---

CONFIDENTIAL

Transcript of Whitney Henriquez

Conducted on February 3, 2022

292

140:20, 141:2, 141:10, 141:20, 195:10, 195:14, 195:17, 195:20, 197:4, 197:6, 197:14, 197:22, 198:14, 251:6 facilitating 276:12 facing 177:8, 180:10 fact 14:9, 29:10, 31:19, 99:3, 142:12, 169:13, 170:1, 246:6, 252:1 facts 167:1 failed 152:13 failing 172:22 fair 42:10, 43:9, 46:1, 56:1, 60:14, 88:4, 93:18, 99:5, 104:14, 133:7, 158:1, 224:15 fairfax 1:2, 7:5 fall 178:16 falling 69:8, 69:15, 69:21 falsely 108:17, 273:10 familiar 67:21, 101:14, 148:2 family 43:4, 43:7, 43:11, 70:20 far 58:15, 207:15, 255:12	faster 155:17, 222:7, 239:16 father 35:4, 35:19, 39:16, 43:12, 43:17, 43:19, 43:20, 44:13, 51:6, 51:12, 52:3, 52:19, 54:1, 54:10, 54:16, 56:19, 58:10, 58:21, 59:6, 62:8, 216:12, 216:18 father's 36:2, 36:19, 37:5, 37:13, 39:2, 60:15 fearful 44:4 february 1:16, 7:7, 102:10, 103:7, 154:22, 156:8, 157:8, 158:8, 278:17 feel 140:20, 141:2, 141:10, 141:20, 260:15 feeling 218:3, 218:20, 255:7, 255:8, 255:22, 256:8, 256:15, 259:2, 267:15, 268:21, 270:22 feet 54:21, 62:6, 176:11 fell 55:20 felt 180:22, 181:10, 181:11, 184:1, 187:13, 245:6 few 66:7, 84:1,	87:16, 113:17, 242:20, 247:15 fewer 87:14 fight 86:9, 112:2, 145:11, 241:5, 241:9 fighting 72:14, 109:8, 110:22, 111:12, 135:17, 242:4, 242:15, 244:12 fight 57:11, 225:18, 226:2 figured 263:9 file 260:5 filthy 241:13 finally 13:4 fine 168:5, 252:17, 252:18 finger 193:2, 193:8, 193:15, 193:21, 194:2, 194:6 finish 12:12, 12:13, 33:10, 159:5, 159:7, 198:10, 222:22, 245:4, 260:2, 270:14, 272:15 finished 16:16, 68:7, 102:14, 103:4, 206:9, 232:1, 245:2 firm 262:22 first 8:12, 13:5, 37:11, 48:7,	62:15, 63:8, 65:21, 76:13, 77:2, 78:22, 84:1, 84:13, 85:10, 95:6, 109:16, 114:3, 115:13, 116:22, 119:5, 121:8, 124:9, 125:11, 132:10, 133:3, 135:3, 166:20, 172:6, 200:21, 202:4, 206:20, 207:3, 216:12, 236:16, 237:11, 237:18 fitch 82:9 five 46:2, 49:8, 50:22, 51:17, 52:14, 65:11, 98:3, 109:16, 116:21 fix 208:20 flabbergasted 96:13 flamingos 131:5, 164:12 flattened 176:5 flinch 177:11 flinched 178:13 flinching 187:12 floor 2:19, 172:6, 176:7 focused 177:20 follow 157:8 follow-up 100:16 following 28:14, 112:9,
--	---	--	--

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

293

211:20 follows 8:15 foregoing 278:8 forgive 25:17, 109:14 forgot 37:10 former 8:20, 166:8 forward 182:18, 182:19, 182:20, 183:1, 185:1, 186:21 found 160:5, 160:6, 170:2 four 36:12, 37:4, 98:3, 273:17, 274:4, 274:7 fourth 140:17 frame 84:6, 121:11 frequent 225:19 friday 236:17 fridge 54:9, 54:11 friend 23:4, 67:16, 67:22, 70:16, 70:17, 74:6, 91:21, 96:18, 152:6, 157:4, 212:22, 236:14 friendly 161:19, 236:16, 247:20 friends 68:12, 70:6, 249:21 friendship 161:18, 213:1 front 108:2, 139:5,	224:11, 243:2 frustrated 113:13 fuck 210:14, 227:14, 227:21 fucker 248:9 fucking 248:6, 248:7 full 35:2, 35:8, 178:22, 225:20, 255:4, 259:17, 278:9 fully 110:11, 111:7, 197:4, 265:13, 271:10, 274:10 function 203:12 fund 82:4 funny 104:5, 104:8, 162:10, 229:14, 229:15, 230:17 further 9:7, 141:18, 168:16, 175:19, 182:20, 256:19, 277:7, 278:11 future 258:5, 259:1 <hr/> G <hr/> gave 149:21, 270:9 gavin 10:19 gears 34:18 general 138:11 generally 16:11, 45:13, 87:12 generous 250:6	gentleman 143:8 genuinely 271:20 gestures 184:12 getting 180:22, 190:9, 227:16, 268:22 give 31:10, 46:18, 46:21, 111:6, 123:21, 155:12, 155:14, 163:9, 252:9, 255:11, 256:22, 267:19, 268:4 given 150:1, 189:3, 189:17, 229:4, 241:2, 278:15 giving 23:18, 23:19, 92:7 glass 139:3, 148:6 glasses 139:7 going 9:16, 10:20, 10:21, 13:4, 18:10, 21:2, 21:5, 22:4, 26:13, 34:7, 44:7, 44:10, 45:21, 75:3, 92:15, 102:12, 102:22, 103:2, 104:6, 106:18, 107:17, 108:13, 109:4, 113:17, 124:22, 125:7, 125:11, 125:20, 125:22, 127:18, 128:17, 138:10, 145:18, 151:16, 155:20, 165:22, 188:16, 197:11,	205:17, 206:16, 216:4, 220:21, 225:3, 225:21, 227:12, 229:21, 230:15, 231:21, 232:2, 232:21, 232:22, 233:1, 246:1, 249:1, 252:9, 253:14, 254:2, 254:17, 255:17, 255:19, 260:17, 262:9, 264:17, 267:5, 271:2, 271:21, 273:3, 274:9, 274:17 gone 80:10, 174:1, 182:20, 259:9 good 7:17, 7:21, 8:19, 43:8, 62:4, 99:22, 109:3, 164:10, 164:22, 258:9, 261:7, 277:4 goodness 202:13 gotcha 128:15 grab 146:9, 190:19 grabbed 188:7, 188:8, 190:11, 191:19 grabbing 188:13, 191:15, 192:4, 195:12 graduating 80:15 grandmother 36:18 grandparents 82:2 grasped 99:13 great 80:21, 131:12,
--	---	---	---

CONFIDENTIAL

Transcript of Whitney Henriquez

Conducted on February 3, 2022

294

200:5, 200:12, 275:10 greek 270:5 green 201:6, 239:19 grew 42:4 gross 253:6 grossly 31:19 group 146:20 grow 35:9 growing 34:20, 36:7, 42:12, 42:21, 55:1, 55:19, 57:11, 58:3, 62:15, 98:17 guards 142:19, 146:18, 146:21 guess 89:16, 115:11, 152:8, 228:11, 275:16 guy 56:11 guys 242:4, 252:12, 252:15, 257:1, 263:18 guys's 276:11	191:19, 192:4, 195:12, 198:19 half 254:15, 254:20 half-sister 38:16 hammer 103:21, 104:1, 104:2, 104:10, 120:16, 164:11, 164:20 hammerhead 104:1, 104:3, 104:10, 104:12, 120:18, 247:19 hancock 81:10 hand 8:9, 99:13, 104:20, 105:7, 111:17, 174:19, 181:3, 181:13, 185:20, 186:8, 187:15, 187:20, 188:7, 188:9, 188:14, 190:11, 190:13, 190:19, 190:22, 191:1, 191:4, 191:12, 191:14, 191:16, 191:18, 192:3, 192:5, 192:7, 192:11, 192:17, 192:20, 193:15, 193:21, 193:22, 194:2, 194:5, 251:7, 259:15, 278:15 hands 43:16, 44:3, 45:2, 45:3, 48:19, 49:13, 49:22, 50:12, 52:4, 52:10, 54:2, 59:18, 60:17, 180:20, 181:3, 216:18 hanging 164:1	happen 88:16, 154:18, 196:7 happened 45:19, 87:4, 92:8, 99:15, 199:5, 244:8, 253:7 happening 93:11, 98:18, 137:14, 244:8 happens 264:4 happy 42:11, 42:20, 43:5, 43:8, 112:21, 113:5, 113:7, 248:7, 258:18, 261:16, 263:22 hard 59:16, 88:19, 119:10, 128:1, 140:11, 140:14, 176:3, 185:16, 185:18, 188:20, 189:9, 189:16, 189:20, 190:12, 193:20, 195:11, 195:19, 228:7, 228:12 harder 60:9, 111:21, 112:11 harm 234:1 harming 206:21 hate 132:15, 210:14 head 12:4, 119:15, 120:19, 188:9, 190:12, 191:5, 191:16, 191:18, 192:8, 192:22, 194:15, 195:10, 195:20, 197:12,	197:22, 198:5, 198:13, 225:4 heading 212:11 health 255:14, 256:7, 258:15, 259:4, 260:13, 271:15 hear 12:16, 93:10, 223:4, 261:2, 261:15, 272:5 heard 1:8, 3:12, 4:8, 7:4, 8:2, 8:3, 14:9, 34:21, 35:22, 36:3, 37:1, 39:16, 52:4, 102:9, 103:7, 131:8, 145:12, 166:5, 169:10, 169:13, 170:9, 171:1, 173:17, 179:20, 180:10, 181:16, 181:17, 184:22, 187:15, 187:21, 188:6, 188:19, 189:7, 190:11, 190:20, 191:5, 193:14, 194:5, 194:17, 195:5, 199:4, 203:8, 204:8, 204:11, 205:3, 205:16, 206:2, 206:15, 206:20, 207:4, 207:6, 210:3, 210:11, 210:12, 210:15, 211:1, 211:15, 242:14, 251:6, 258:3, 259:13, 260:6, 264:16, 268:8 hearsay 15:21, 26:16, 27:5, 27:17, 29:7, 39:18,
H			
ha 142:3, 142:6, 228:6 ha" 142:6 hair 146:9, 188:8, 188:13, 190:11, 190:20, 191:15,			

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

37298

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

295

66:11, 74:17, 75:5, 78:11, 79:18, 94:18 heavier 55:19 heavy 44:5, 55:14 held 2:2, 7:10, 89:17, 198:19 help 107:9, 111:6, 140:6, 167:20, 224:10, 245:16 helpful 256:21 helping 234:15 henriquez 1:14, 2:1, 5:3, 5:8, 5:15, 6:2, 7:3, 8:4, 8:8, 8:11, 8:19, 9:7, 10:9, 11:8, 13:18, 18:15, 19:9, 24:18, 34:18, 38:11, 100:14, 101:11, 103:6, 106:16, 108:21, 147:19, 166:1, 259:20, 260:14, 261:13, 262:11 henriquez's 5:9, 101:4, 256:7, 258:15, 260:13 here 7:2, 13:9, 13:20, 14:9, 16:18, 17:17, 18:9, 27:8, 58:20, 65:21, 78:20, 79:20, 80:21, 80:22, 81:6, 82:12, 105:16, 110:6, 115:18, 117:5,	126:13, 127:16, 130:17, 150:4, 164:10, 184:6, 193:13, 205:22, 223:1, 225:17, 240:9, 242:3, 248:8, 248:15, 252:10, 252:13, 256:6, 261:12, 268:2, 269:19, 272:8, 272:9, 273:16, 276:18 here's 252:8 herself 79:14, 202:17, 204:5, 205:17, 206:1, 206:21, 207:8 hesitate 177:3 hey 240:8, 247:18 hiatus 86:18 hid 202:18, 203:5, 204:13, 204:22, 206:14 hide 203:7, 203:21, 204:18, 205:3 hiding 227:22 high 80:15 himself 92:9 hindsight 89:21, 246:2 hinged 96:18 hired 91:17 hit 45:8, 46:1, 47:5, 47:6, 47:20, 48:7,	48:13, 48:19, 49:13, 49:14, 49:21, 49:22, 50:6, 50:11, 52:4, 52:9, 52:19, 53:3, 53:9, 53:10, 53:18, 53:22, 56:20, 59:18, 60:16, 85:17, 86:1, 145:1, 145:6, 146:8, 174:8, 175:10, 175:12, 175:15, 176:1, 176:10, 176:19, 176:21, 177:5, 177:7, 177:9, 177:11, 177:13, 178:18, 179:2, 181:16, 183:10, 183:16, 183:20, 185:1, 185:16, 185:18, 185:19, 186:3, 186:21, 187:15, 187:21, 188:5, 188:19, 189:8, 189:19, 191:18, 220:12, 223:15, 225:10, 232:8, 233:15 hitting 52:18, 53:14, 53:15, 54:1, 177:22, 181:17, 181:18, 191:15, 192:8, 193:14, 194:5, 215:7, 230:2 hold 7:8, 33:8, 218:7, 231:20, 257:10, 267:4 holding 188:13, 192:4 holes 211:8 holmes 232:6, 232:8,	233:6 home 10:8, 77:14, 128:5, 142:16, 142:21, 145:19, 151:19, 228:6 honest 192:18 honestly 38:3, 46:18, 63:5, 69:1, 79:6, 116:7, 212:17, 217:7, 220:7 hop 103:10, 103:16, 103:18, 120:18, 240:2 hope 248:5, 251:11, 257:1, 260:15 hopefully 140:6 hotel 82:11 hours 250:9, 250:18, 251:10, 251:21, 252:5, 253:3, 254:15, 254:21, 254:22, 255:21, 256:5, 259:9, 265:15, 270:18, 271:10, 271:17, 272:17, 272:19, 274:8, 274:11 house 10:9, 10:10, 10:11, 10:15, 36:6, 37:14, 37:21, 58:18, 68:19, 69:4, 76:12, 76:15, 79:1, 80:14, 81:2, 128:12, 128:14, 135:4, 135:11, 140:7, 143:9, 149:9
--	--	--	--

CONFIDENTIAL

Transcript of Whitney Henriquez

Conducted on February 3, 2022

296

household 35:10, 37:6, 39:5, 42:3, 57:4 howell 212:20, 212:21, 213:2, 213:7, 213:16, 214:1, 214:7, 214:18, 215:5, 215:12, 215:19, 216:3, 216:10, 217:12, 252:6, 255:20, 271:5 howell's 217:1 however 255:4 huge 96:3 humor 230:8 hundred 32:6, 70:4, 72:4 hung 276:13 hurled 174:6 hurling 233:12 hurt 53:15, 95:21, 97:9, 204:14 husband 10:17, 13:22, 56:19 husband's 10:18 hypothetical 31:7, 56:5, 59:3, 67:12, 76:7, 78:8, 79:17, 90:16, 91:7, 94:1, 94:18 I idea 110:9, 161:7,	237:10 identification 23:22, 24:2, 101:6, 106:11, 125:5, 131:15, 147:13, 154:6, 163:2, 199:18, 221:6, 227:7, 239:4, 247:2 ignoring 222:15 ii 1:4, 2:7, 3:4, 4:5, 13:2 illegal 58:15, 64:10, 121:7 illness 256:2 imagine 142:18, 160:22, 187:7, 189:5, 189:17, 219:17, 219:19, 223:13, 238:20, 241:1, 249:18, 250:3 immediately 194:17, 195:1, 196:7 imminent 9:8 impact 184:3, 184:4, 187:5, 187:7, 187:11, 192:6, 192:21, 195:19 impacted 178:15, 185:20, 188:4, 195:22 impasse 89:4, 89:11, 97:1, 97:5 impeachment 127:2 implied 96:20 imply 91:17	importance 96:1, 258:16 important 12:1, 12:6, 32:8, 32:12, 33:13, 103:1, 230:4, 251:13, 255:14, 256:6, 261:11, 266:8 improper 26:12, 27:4, 27:16, 126:10, 126:19, 127:1, 152:18, 153:17, 218:13 in-person 19:15, 30:18 inaccurate 22:19, 262:16 inappropriate 26:16 incident 25:7, 125:1, 125:9, 125:22, 126:3, 126:12, 127:15, 128:4, 128:16, 129:2, 129:21, 130:15, 162:18, 166:2, 166:12, 166:16, 168:10, 169:5, 186:15, 209:10, 242:21, 243:7, 243:17 incidents 232:14 incinerator 165:7 include 32:8 includes 32:22 including 31:18, 114:8, 198:5, 254:10 incorrect 29:19, 130:17, 166:8	incorrectly 265:3, 275:8 indeed 263:16 indicate 178:8, 190:5 indicated 255:6, 260:19, 260:21 indicates 212:12, 249:7 inebriated 62:6 inexcusable 267:10 infamous 217:18 influence 207:14 information 89:19, 89:20, 202:1, 240:1 initially 70:17, 88:3, 91:9, 143:17, 152:4, 171:3, 171:6, 171:12 injured 54:10, 178:1, 185:7, 193:15, 193:21, 194:6, 194:14 injuries 137:5, 178:6, 195:5, 195:10, 195:18, 197:5, 197:22, 198:4, 198:13, 198:21, 199:1 injury 138:16, 138:17, 185:11, 185:12, 192:12, 196:19 ink 267:7 instance 131:10, 146:7 instances 57:20, 58:1,
---	---	--	---

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

297

60:22, 63:18 instead 112:10, 131:2, 181:17 instruct 16:22, 17:9, 17:20, 18:14, 20:15, 21:5, 21:12, 28:5, 29:4, 32:3, 32:15, 33:17, 34:11 instructing 28:13 instructs 12:16 intend 33:2, 34:2 intended 186:4, 265:14, 269:12, 274:10 intense 180:6 intention 265:20 intentionally 182:4 interested 278:13 interrupt 171:15 interrupted 42:16, 153:6, 222:21 interrupting 102:13, 122:1 interruption 205:11, 206:8, 231:22, 237:8, 245:1 intervene 188:11 intervened 226:2 introduce 7:15 investigated 91:19, 95:16,	96:6 investigating 91:16 investigators 91:18 invisible 267:6 involve 29:2 involves 28:6 irrelevant 244:16 irrespective 9:17 irritated 197:1 irvine 2:20 isaac 208:15, 220:6, 220:8, 220:9 island 118:16, 118:17, 171:17, 174:17 issue 60:13, 93:1, 96:6, 111:17, 268:13, 268:15 issues 23:1, 58:4, 104:19, 105:7, 148:19, 224:11 itself 108:7, 108:19, 161:17, 253:13 <hr/> J <hr/> jacket 85:8 january 254:3 jennifer 212:20, 212:21, 213:2, 213:22, 214:18, 215:5, 215:12, 215:19, 216:3, 216:10,	252:6, 255:20, 271:4 jennifer's 217:1 jeopardize 259:4 jillian 269:16 job 1:20, 82:10, 164:10, 164:22, 276:10, 276:18 jobs 82:8, 82:12 john 1:4, 2:7, 3:4, 4:5, 91:2 johnny 7:20, 8:21, 13:2, 90:10, 91:2, 91:9, 91:11, 92:22, 93:3, 93:7, 93:17, 93:20, 95:1, 95:6, 95:7, 95:15, 95:21, 96:5, 96:8, 103:17, 103:18, 104:7, 104:9, 119:4, 119:17, 120:13, 121:15, 122:3, 131:20, 134:18, 135:16, 136:5, 136:7, 139:17, 143:4, 147:3, 149:4, 149:7, 149:8, 162:6, 169:15, 170:2, 170:20, 171:2, 172:12, 172:15, 172:18, 173:4, 173:13, 174:5, 187:6, 187:14, 199:10, 209:1, 209:4, 214:19, 215:7, 215:20, 216:5, 223:9,	225:8, 226:3, 227:10, 228:10, 228:20, 230:18, 231:3, 233:14, 234:1, 240:18, 241:5, 244:1, 247:6, 247:11, 247:21, 249:20, 251:7, 252:3, 259:15 johnny's 95:16, 148:13, 225:4 johnson 4:13, 7:13 joined 13:9, 13:15, 190:5 joke 104:12, 231:2 joking 228:18, 228:20, 230:2 jokingly 158:16 josh 208:14 judge 24:13, 103:2, 260:6, 275:1, 275:4 july 5:10, 24:6, 30:9 jump 13:9, 250:8 jumping 212:10 jurisdiction 94:8 justice 24:13, 24:15, 25:13 justified 243:10 <hr/> K <hr/> k-a-i-t-l-y-n 67:16
---	---	--	--

CONFIDENTIAL

Transcript of Whitney Henriquez

Conducted on February 3, 2022'

298

k-r-a-j-e-w-s-k-i 144:16 kaitlyn 67:16, 67:22, 68:11, 68:18, 69:8, 69:15, 69:20 kazinsky 144:10 keep 127:5, 180:7, 264:5, 276:11 keith 128:17, 146:14, 146:20 kept 202:17, 203:3, 265:2, 268:5 kid 55:12 kids 57:11, 57:19 kill 202:17, 203:4, 205:17, 206:1, 207:7, 216:4 killing 204:5 kim 4:13, 7:13, 264:3, 276:16 kind 9:5, 44:8, 93:1, 94:9, 99:1, 104:4, 104:6, 104:11, 138:4, 138:5, 161:17, 175:12, 176:3, 177:11, 178:14, 182:19, 187:7, 187:9, 194:3, 214:5, 216:11, 224:9, 256:20 kindly 23:21, 83:17 kipper 203:20	kitchen 93:10, 93:16, 171:6, 171:12, 171:17, 172:2, 172:6, 174:17, 175:14, 176:8, 211:9 kitnick 91:21 knew 77:1, 96:14, 96:15, 224:3, 224:5, 225:17, 226:12, 230:15, 230:17 knife 231:15, 232:8, 233:6, 233:12 knocked 211:13 knowing 55:5, 169:20, 204:9, 268:6 knowledge 32:21, 34:4, 71:17, 207:17, 219:11 known 64:4, 76:22, 204:4, 204:12, 225:9 knows 14:2, 14:11, 103:2, 243:13, 259:6, 259:8 krajewski 144:11, 144:17, 145:12 kyle 142:16, 142:17, 142:20, 145:18, 145:19 <hr/> L <hr/> label 11:3 lack 224:12	land 189:5 large 154:14 largely 88:1 larger 101:16, 107:7, 127:22, 200:17, 221:11 last 41:14, 42:1, 42:2, 47:19, 48:13, 82:13, 89:4, 100:17, 104:18, 105:5, 105:6, 116:3, 118:11, 122:2, 122:7, 122:13, 134:11, 134:17, 134:22, 135:1, 144:6, 145:19, 146:3, 162:3, 171:22, 172:21, 203:1, 232:1, 242:3, 262:6 late 35:19, 35:20 later 11:1, 25:9, 92:16, 127:10, 130:4, 136:14, 150:15, 180:5, 197:16 laugh 141:19 laughed 162:7 laughing 142:11 laura 1:8, 3:12, 4:8 law 254:9 lay 241:13 layout 93:8, 172:3	lead 243:6 leading 24:16 leaked 92:2 leaking 89:19, 90:8, 90:12, 90:18, 91:4, 91:12 leaks 91:20, 93:20, 95:16 learn 119:5, 119:17, 120:3 learning 154:15, 154:19 least 58:18, 113:4, 161:16, 187:5, 187:13, 224:22 leave 112:9, 112:13, 112:15, 140:10, 257:16, 260:19, 261:3 leaving 79:1, 261:19, 265:2 led 176:6 ledge 143:4 left 113:5, 143:7, 146:16, 171:8, 174:19, 183:18, 190:22, 191:3, 191:12, 192:20, 199:9, 218:2, 218:19, 260:18, 276:22 legal 28:3, 28:10, 28:17, 29:7, 29:14, 31:20, 32:11, 33:5,
--	---	---	---

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

37302

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

299

33:12, 34:7 legs 83:12, 100:5 length 176:15, 176:18 lengthy 274:13 lens 84:5 leo 252:2 less 41:16, 57:16, 60:11, 65:10, 65:11 less-than-happy 43:5 let's 77:11, 90:5, 101:1, 106:8, 113:14, 119:2, 131:13, 147:10, 154:3, 162:3, 162:20, 180:7, 184:7, 186:20, 200:21, 209:11, 212:19, 217:18, 227:3, 239:1, 246:19, 252:20, 261:19, 266:17, 269:19 letter 213:8 level 93:13, 171:9, 172:7, 172:8, 173:22, 174:2, 174:9, 176:5 liars 266:21 license 74:14, 75:2, 76:3, 76:10, 76:17 lie 259:14 life 98:20, 203:13,	204:3, 216:12 lifeguards 70:19 lifetime 246:5 light 255:13 lighter 156:4 lights 236:17 limitation 254:11 line 13:13, 24:12, 104:8 lines 109:16 link 263:2, 265:8, 265:10, 266:11, 266:18, 269:15, 269:18, 270:2, 270:9, 273:16 lip 137:11, 138:8, 138:13, 138:18 lisa 81:13, 81:16, 128:8 lisa's 82:13 literally 256:22 little 9:10, 34:19, 42:9, 57:22, 60:9, 84:5, 98:11, 104:9, 133:4, 139:2, 141:18, 155:17, 168:16, 188:16, 203:19, 221:11, 228:7, 228:12, 250:15, 272:18 live 10:8, 20:2, 23:11, 30:18,	36:6, 36:13, 37:6, 37:20, 39:5, 78:14, 79:1, 79:2, 79:15, 80:1, 81:1, 81:15, 129:20 lived 35:15, 36:18, 36:19, 37:1, 37:14, 38:5, 38:6, 39:12, 39:13, 79:8, 80:11, 81:6, 81:12, 128:8 lives 85:14 living 10:15, 57:11, 77:21, 81:19, 82:20, 84:14, 85:10, 85:12, 93:12, 115:18, 117:5, 119:13, 128:13, 143:20, 172:6, 208:15, 208:16, 220:5 lizard 104:9 lloyd 171:21, 172:10, 173:3, 175:3, 175:11, 175:17, 176:11, 176:12, 176:18, 176:19, 176:21, 177:13, 178:18, 179:2, 199:3, 208:13 llp 2:9, 2:17, 3:6 located 172:3 locations 7:11 locked 195:3, 210:22 loft 202:14, 206:18,	208:15, 208:16, 210:16, 220:5 logan 70:7, 70:12, 70:16, 71:18, 72:2, 72:13, 72:20, 73:3, 73:16, 73:22, 74:12, 74:15, 75:16, 100:16 logan's 71:13, 100:17 logo 148:14 long 17:15, 18:8, 36:21, 37:20, 38:4, 64:3, 65:20, 82:4, 87:5, 89:4, 104:4, 229:9, 230:14, 236:6, 236:7 long-established 254:8 look 109:2, 125:2, 135:2, 141:18, 155:9, 168:4, 195:15, 208:18, 227:12, 230:10, 246:19 looked 131:5, 137:20, 138:18, 138:19 looking 25:17, 30:2, 135:21, 181:1, 181:12 looks 148:2, 151:8, 156:17, 273:16 lord 25:12 los 9:3, 78:20, 78:22, 79:15, 81:7, 81:9,
---	---	--	--

CONFIDENTIAL

Transcript of Whitney Henriquez

Conducted on February 3, 2022

300

81:15, 84:14, 166:3, 168:9 lost 227:18 lot 12:16, 96:18, 98:18, 226:2, 250:7, 269:19 love 139:12, 228:7, 240:9, 245:19, 246:15, 248:9 loved 244:13 loves 242:5 low 258:1 lucien 4:11, 155:12, 266:2, 266:7, 269:8, 272:3, 274:1 luck 261:8 lunch 252:12 lunge 181:16 lunged 182:18, 182:19 lurched 185:1, 186:21 lying 266:4, 266:5, 266:6, 266:21	272:22 maintain 161:18 make 12:21, 25:18, 28:17, 87:19, 94:8, 101:14, 101:16, 102:6, 127:22, 140:14, 141:11, 141:15, 155:4, 155:16, 169:2, 194:18, 195:3, 199:3, 200:16, 205:16, 222:5, 223:16, 224:5, 239:16, 244:17, 245:17 makes 41:6, 224:12 making 12:10, 102:20, 107:7, 184:12, 192:5, 192:21, 217:2 maliciously 96:16 man 54:16 managed 182:22 manipulative 160:6 many 16:2, 31:3, 50:11, 51:11, 52:9, 65:5, 66:1, 66:22, 84:19, 84:22, 86:17, 87:2, 95:22, 103:19, 114:13, 114:17, 116:18, 176:11, 236:7, 265:19 mara 38:18, 38:19, 39:5, 39:15, 40:7, 41:2, 41:9, 42:1	march 24:19, 25:9, 88:20, 125:1, 126:3, 129:21, 130:4, 131:8, 131:9, 132:13, 146:4, 164:4, 166:3, 166:11, 166:16, 168:10, 169:5, 192:10, 202:4, 206:19, 207:9, 207:15, 207:20, 208:8, 209:4, 209:14, 210:6, 211:21, 212:6, 278:5 marie 152:7 marijuana 66:14, 66:19, 114:8 mark 21:14, 241:18 marked 10:21, 23:21, 24:1, 101:6, 106:11, 125:3, 125:5, 131:15, 147:13, 154:4, 154:6, 163:2, 199:13, 199:18, 221:1, 221:5, 227:6, 239:4, 247:1 marks 196:11, 211:16, 220:17, 227:1 marriage 120:8, 226:1, 241:15 married 161:2 material 267:1 maternal 82:2 matter 7:4, 240:10,	241:18 maybe 48:5, 48:6, 72:5, 77:19, 89:10, 107:8, 142:18, 184:6, 228:11, 266:4, 266:12, 267:6 mdma 64:16, 116:13, 117:1, 117:21 mean 42:20, 63:6, 90:8, 97:5, 105:16, 106:6, 110:13, 110:19, 111:9, 111:18, 136:12, 141:1, 142:5, 161:2, 171:15, 182:8, 183:15, 193:20, 212:12, 223:7, 232:5, 249:6, 250:4, 265:17 meaning 43:11, 111:16 means 232:20 meant 91:17, 136:4, 136:6, 168:21, 203:16 mecklenburg 278:2, 278:21 media 89:19, 90:8, 90:13, 90:19, 91:4, 91:13, 92:3 medical 11:18, 186:14 medication 58:15, 58:19, 60:3, 124:20, 203:14, 203:17 medications 11:14, 58:22 medicine 203:13
M ma'am 275:14 made 27:12, 31:4, 91:3, 91:14, 130:8, 171:6, 195:17, 201:22, 212:12, 212:14, 237:22, 244:16, 252:5, 255:13,			

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

37304

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

301

meds 202:18, 203:4, 203:7, 203:18, 203:22, 204:17, 205:2, 205:13, 206:13	139:11, 154:9, 154:21, 155:7, 155:10, 156:1, 200:14, 202:3, 207:8, 209:11, 221:16, 222:16, 229:10, 229:12, 229:22, 239:9, 239:11, 240:5, 246:1, 246:13	134:7, 141:16, 149:20, 150:1, 155:16, 168:17, 189:6, 189:13, 220:3, 224:11, 239:16, 270:2, 273:11	mistake 130:8
meet 135:4, 219:9	meeting 18:8, 261:4, 261:19	mind 99:21, 155:19, 199:21, 222:2	mistaken 209:13
memory 57:17, 68:5, 75:7, 94:4, 131:1, 138:7, 143:8, 152:22, 161:22, 175:12, 192:18, 196:18, 209:10, 242:13	met 70:22, 120:5, 123:1, 123:8, 219:12	mindful 252:12	misuse 153:14, 166:22, 167:10
mena 3:5, 7:19	metaphorically 111:20, 112:13	mine 23:4, 132:2, 149:20, 195:2, 227:14, 227:19, 227:22, 230:6	mixed 130:22, 131:2, 152:22
mention 9:16, 25:19	methamphetamines 64:21, 116:8	minimal 65:10, 82:12	mixture 43:9
mentioned 71:18, 84:20, 112:10, 173:19, 182:2, 208:6, 208:14, 220:4	mezzanine 93:12, 171:9, 172:7, 173:21, 174:2, 174:9, 175:8, 175:20, 176:5	minus 32:22	moment 23:17, 27:11, 82:18, 83:19, 256:20, 257:1, 276:13
mercifully 24:8, 154:13	michael 275:2	minute 101:13, 252:20, 272:5	moments 43:5, 43:6
message 104:17, 105:10, 109:22, 135:4, 135:15, 142:6, 142:14, 155:6, 155:9, 203:2, 205:14, 212:12, 224:3, 240:18, 246:7, 246:12, 249:7	michelle 3:15, 8:1	minutes 100:1, 100:5, 252:11, 252:13, 262:6, 273:22	moniz 2:16, 190:1, 190:5, 254:2
messages 5:11, 5:12, 5:16, 5:20, 5:22, 6:3, 6:5, 6:7, 6:9, 6:11, 106:13, 132:12, 133:3, 133:20, 135:20, 136:3,	micelson 2:18	mis 167:9	months 9:8, 89:10, 97:18, 97:22, 98:1, 98:5, 241:17, 255:10, 267:15
	mid 226:16	mischaracterizat- ion 253:7	more 9:10, 15:17, 42:9, 46:2, 46:8, 46:14, 46:22, 49:2, 49:6, 49:8, 50:17, 50:22, 51:17, 51:21, 52:14, 57:22, 87:15, 111:19, 113:15, 114:19, 115:2, 115:7, 115:11, 116:21, 131:19, 137:21, 162:1, 166:1, 186:5, 187:8, 196:21, 251:9, 253:4, 255:14, 255:15, 272:18
	middle 9:22, 105:3, 126:2, 135:3, 182:6, 267:1, 267:13	mischaracterizing 179:8	morning 7:17, 8:19,
	midnight 210:1	misrepresentation 263:10	
	might 11:15, 11:19, 14:4, 53:17, 56:9, 69:4, 76:22, 86:15, 88:2, 94:3, 99:22, 100:4, 105:20, 118:19, 121:22, 132:19,	miss 264:7	
		misses 222:15	
		missing 222:20, 223:2, 223:3, 233:5	
		misspoke 168:21	
		misstatement 28:20	

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

302

17:17, 30:17, 31:1, 134:2, 219:14, 267:4, 269:11, 273:9 most 241:14, 256:6, 261:11, 268:6, 268:8 mostly 16:16, 41:22, 88:7, 93:17, 183:22, 184:1 mother 35:3, 35:19, 35:20, 36:19, 39:14, 43:12, 43:16, 54:2, 54:7, 56:18, 61:3, 61:20, 62:2, 62:8 motion 260:5, 274:20 motive 223:20 move 44:11, 77:11, 77:13, 80:13, 80:16, 106:8, 107:9, 119:2, 131:13, 147:10, 154:3, 162:20, 183:8, 204:15, 212:19, 213:22, 217:18 moved 65:21, 77:22, 78:5, 78:14, 81:2, 84:3, 84:4, 143:17, 143:21, 175:22, 176:2, 176:7, 177:15, 183:14 movement 187:8, 187:13 movie 237:18, 238:3, 238:9, 238:15 movies 236:16	moving 51:5, 214:7 much 9:6, 30:9, 38:19, 54:22, 55:5, 55:7, 56:9, 60:11, 64:18, 65:11, 65:13, 83:13, 112:14, 113:12, 117:20, 163:11, 172:8, 172:16, 172:19, 180:5, 224:8, 242:5, 244:13, 244:14, 245:20, 248:6, 250:14, 254:20, 264:9, 269:11, 274:1 multiple 190:13, 252:4, 254:12 murphy 3:14, 8:1 mushrooms 64:17, 67:1, 117:9, 117:13, 118:7 must 38:22, 202:13 mute 257:10, 257:12 mutual 99:2, 99:9, 250:22 <hr/> <div style="text-align: center;">N</div> <hr/> name 7:17, 7:21, 8:19, 10:18, 10:19, 21:9, 37:11, 38:17, 81:13, 82:13, 100:17, 144:5, 144:6, 172:1, 172:21, 201:7 named 67:16, 70:7	names 152:7, 172:22 narrow 88:22 nasty 220:16 nathan 232:4, 232:5, 232:8, 233:5, 233:12 natural 100:4, 161:14, 162:1 nature 60:10 near 98:19, 174:18, 259:1 nearly 215:13 necessarily 40:3 necessary 34:12 need 9:1, 9:9, 13:10, 83:11, 83:12, 110:7, 190:5, 240:10, 245:16, 245:17, 261:18, 262:5, 263:6, 275:16, 275:19, 275:20 needed 201:19 needs 253:8 neither 278:11 neutral 251:15, 251:18, 276:17 never 29:10, 39:12, 43:16, 53:22, 54:7, 57:2, 62:2, 62:3, 62:4, 62:5,	66:20, 84:3, 86:1, 86:3, 86:5, 90:21, 91:14, 124:20, 145:1, 145:6, 160:17, 201:21, 204:4, 204:7, 204:11, 204:12, 206:2, 206:14, 214:13, 214:17, 215:2, 215:11, 216:17, 216:19, 216:22, 217:17, 241:12, 241:17, 242:6, 256:4, 264:2 nevertheless 244:1 new 3:8, 80:1, 199:22, 230:12, 258:1, 267:19 newll 4:11 next 23:8, 25:11, 25:14, 102:9, 103:6, 103:10, 135:14, 138:10, 142:14, 151:9, 157:3, 172:12, 172:15, 177:8, 177:12, 178:16, 181:14, 188:12, 190:4, 208:18, 209:12, 209:14, 219:2, 227:17 nice 194:2 nickname 104:15, 225:22, 247:20 nicknames 103:19, 104:1, 120:15, 240:2 nicol 24:13, 24:15, 25:13
---	---	--	---

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

303

night 69:5, 197:10, 198:1, 220:12, 236:17, 277:4 nine-and-a-half 9:7, 255:10, 267:14 nobody 206:18, 208:16 nods 120:19 non-party 251:18 non-prescription 63:20, 113:19, 114:4, 118:12, 120:20 non-responsive 204:16 nonparty 251:15 nonprescription 63:9 nook 139:1, 139:3, 139:8, 148:5 normal 43:4, 55:14, 98:12 north 278:1, 278:4, 278:16, 278:21 nose 53:18, 223:7 not-so-clear 104:5 notarial 278:15 notary 278:3, 278:20, 278:22 noted 190:7 nothing 8:14, 15:14, 17:12, 75:20, 225:5 notice 158:9, 162:5	november 254:12 nowhere 273:3 nudge 186:6 nullified 243:10 nullify 223:21 number 46:18, 46:21, 59:13, 59:14, 87:3, 88:5, 98:1, 101:5, 102:9, 102:10, 103:6, 103:7, 115:10, 147:16, 201:18, 247:10, 252:1 numbers 154:11 numerous 225:18 nurse 171:18, 199:3, 200:15, 201:7, 201:8, 201:10 ny 3:8 <hr/> o <hr/> oath 11:12, 31:5, 34:4, 127:15 obj 102:11 object 18:10, 21:2, 22:4, 26:13, 33:20, 33:21, 34:7, 54:3, 75:3, 79:11, 82:14, 93:21, 102:4, 102:12, 104:22, 106:2, 108:14, 127:8, 127:18, 145:21,	193:9, 231:21, 232:21, 232:22, 233:1 objecting 12:14, 28:9, 28:15, 108:15, 108:16, 127:10 objection 12:13, 15:11, 15:20, 16:7, 16:13, 17:6, 18:21, 19:5, 19:11, 19:17, 20:6, 20:12, 21:20, 22:12, 22:20, 23:12, 25:2, 26:12, 27:3, 28:1, 29:13, 29:20, 30:10, 30:19, 31:6, 31:7, 31:16, 32:10, 33:4, 33:11, 35:5, 35:11, 35:16, 36:8, 36:15, 37:7, 37:16, 37:22, 38:7, 38:13, 39:7, 39:17, 39:22, 40:9, 40:14, 40:20, 41:10, 42:5, 42:14, 42:22, 43:13, 43:21, 44:15, 44:21, 45:4, 45:9, 45:14, 46:4, 46:10, 46:15, 47:1, 47:8, 47:15, 47:21, 48:9, 48:15, 48:20, 49:3, 49:9, 49:15, 50:2, 50:7, 50:13, 50:18, 51:1, 51:7, 51:13, 51:18, 51:22, 52:5,	52:11, 52:15, 52:21, 53:5, 53:11, 53:19, 54:4, 54:12, 54:17, 55:2, 55:8, 55:15, 56:3, 56:12, 56:21, 57:6, 57:13, 58:5, 58:11, 59:1, 59:8, 59:20, 60:6, 60:18, 61:5, 61:10, 61:15, 61:21, 62:11, 62:17, 63:2, 63:10, 63:16, 63:22, 64:7, 64:13, 64:22, 65:7, 65:17, 66:3, 66:10, 66:15, 67:2, 67:10, 67:17, 68:2, 68:13, 68:20, 69:9, 69:16, 69:22, 70:8, 70:13, 71:1, 71:8, 71:14, 71:20, 72:9, 72:15, 72:21, 73:5, 73:12, 73:18, 74:2, 74:9, 74:16, 75:10, 75:17, 76:5, 76:19, 77:7, 77:18, 78:3, 78:7, 78:16, 79:3, 79:16, 80:3, 80:8, 80:17, 81:3, 81:21, 82:22, 84:9, 84:16, 85:4, 85:16, 85:19, 86:10, 86:20, 87:7, 87:20, 88:12, 88:17, 89:6, 89:12,
---	--	--	---

CONFIDENTIAL

Transcript of Whitney Henriquez
Conducted on February 3, 2022

304

90:14, 91:5, 93:4, 93:21, 94:10, 94:16, 95:2, 95:11, 96:10, 97:2, 97:11, 97:19, 98:8, 98:14, 99:6, 99:16, 100:18, 103:12, 109:11, 109:18, 110:2, 110:15, 111:1, 111:13, 112:4, 112:18, 113:9, 113:21, 114:5, 114:14, 114:20, 115:3, 115:8, 115:15, 115:21, 116:4, 116:9, 116:14, 116:19, 117:2, 117:10, 117:16, 118:1, 118:8, 118:13, 118:20, 119:7, 119:19, 120:10, 121:3, 121:16, 122:4, 122:10, 122:19, 123:3, 123:9, 123:17, 124:2, 124:10, 124:17, 125:17, 126:5, 126:8, 126:9, 126:15, 126:16, 127:20, 128:9, 128:19, 129:4, 129:15, 130:1, 130:9, 130:18, 133:10, 133:16, 134:3, 134:13, 134:19, 135:6, 135:22, 136:8, 136:16, 136:22, 137:6, 139:19, 141:3, 141:12, 141:22, 142:8, 142:22, 143:12, 144:2, 144:7, 144:13, 144:19,	145:2, 145:7, 145:14, 146:10, 146:22, 147:6, 147:21, 149:17, 150:5, 150:20, 151:5, 152:1, 152:17, 153:13, 155:1, 156:14, 156:21, 157:13, 157:19, 158:4, 158:12, 158:20, 159:12, 159:21, 160:11, 160:19, 161:3, 161:9, 162:11, 163:16, 164:5, 164:15, 165:1, 165:11, 165:18, 166:7, 166:18, 166:21, 167:11, 169:17, 170:5, 170:11, 170:17, 174:14, 174:21, 175:5, 176:22, 178:2, 178:10, 179:3, 179:11, 179:17, 179:22, 180:12, 181:4, 181:20, 182:11, 183:2, 183:5, 183:11, 185:3, 185:8, 185:13, 185:22, 186:10, 186:16, 187:1, 187:17, 187:22, 188:21, 189:10, 190:15, 191:6, 191:21, 192:13, 193:3, 193:17, 194:9, 194:19, 195:7, 196:3, 196:13, 197:7, 197:17, 198:15, 199:6, 201:12, 202:8, 202:20, 203:9, 204:1, 204:19, 205:5, 205:9, 205:10, 205:18,	206:7, 206:22, 207:10, 207:21, 208:10, 209:6, 209:19, 210:7, 210:18, 211:4, 211:17, 211:22, 212:7, 213:3, 213:11, 213:18, 214:2, 214:10, 214:15, 214:21, 215:8, 215:15, 215:21, 216:6, 216:14, 217:4, 217:14, 218:6, 218:8, 218:10, 219:5, 219:15, 219:22, 221:18, 222:17, 223:10, 223:17, 224:17, 225:12, 226:4, 226:19, 228:15, 228:22, 229:17, 230:20, 231:6, 232:9, 232:16, 233:7, 233:18, 234:4, 234:22, 235:6, 235:12, 235:18, 236:2, 236:8, 236:20, 237:6, 237:7, 237:13, 237:19, 238:5, 238:11, 238:17, 239:12, 240:14, 241:6, 241:21, 242:9, 242:16, 243:3, 243:19, 244:4, 244:22, 246:8, 248:1, 248:11, 248:19, 249:3, 249:15, 249:22 objections 12:10, 12:17, 27:15, 29:6, 102:20, 167:9 objects 44:3, 44:13 obscenities 210:13	observation 61:4 observe 72:13, 137:4, 195:16, 220:18, 232:15 observed 198:13 observing 138:12 obvious 11:20, 60:11 obviously 109:5, 225:4 occasion 47:19, 64:17, 153:12, 167:4 occasionally 43:17, 44:2, 47:18, 83:5, 84:3 occasions 46:2, 47:5, 51:11, 66:1, 67:8, 231:4, 233:16, 234:1, 252:1, 252:4 occurred 126:13, 127:16, 128:4, 128:16, 129:21, 166:2 office 8:1, 276:2 officer 276:9 officers 266:5 often 41:3, 45:8, 45:18, 45:20, 48:19, 59:6, 61:19, 84:14, 154:17, 224:5, 226:8, 245:14, 249:21 oh 13:12, 68:8, 83:11, 101:21,
---	---	---	---

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

305

148:8, 162:6, 178:14, 184:10, 209:17, 222:8, 222:11, 246:15, 247:9, 264:11 ok 228:11 okay 13:16, 15:9, 44:19, 77:11, 83:11, 83:14, 90:5, 91:11, 92:20, 100:6, 100:7, 101:21, 102:18, 106:7, 107:1, 109:14, 111:8, 113:14, 117:14, 124:14, 124:21, 125:20, 126:12, 127:3, 127:9, 133:1, 133:3, 135:2, 139:15, 142:20, 145:18, 147:10, 151:16, 154:2, 155:8, 155:19, 155:22, 162:3, 162:19, 165:22, 168:7, 169:8, 180:7, 183:17, 184:2, 184:18, 186:20, 186:21, 188:15, 189:15, 189:21, 190:7, 194:18, 195:14, 198:22, 199:11, 200:5, 200:12, 201:4, 208:18, 212:19, 222:11, 227:3, 227:12, 232:14, 233:14, 234:8, 239:18, 245:6, 245:16, 245:18, 246:18, 247:12, 252:16, 252:21, 257:4, 257:6, 257:9, 261:5, 261:8,	261:9, 261:15, 263:7, 263:16, 269:17, 270:7, 270:10, 270:21, 273:13, 274:1, 274:19, 275:22, 276:6, 277:2 old 38:6, 47:19, 48:3, 48:7, 48:13, 62:21, 62:22, 63:14, 68:11, 70:22, 72:2, 72:7, 77:16, 81:14, 114:3, 115:13, 116:22, 117:7 older 34:21, 36:22, 38:16, 38:19, 38:21, 39:1, 71:6 omitted 31:14 once 50:17, 54:8, 67:6, 84:4, 117:19, 118:10, 231:15 one 12:8, 23:2, 23:3, 27:19, 36:18, 37:13, 41:3, 66:20, 75:7, 75:14, 76:13, 80:7, 81:8, 82:9, 86:15, 87:18, 89:15, 89:16, 89:17, 92:4, 92:5, 99:4, 99:10, 103:19, 107:11, 114:10, 118:17, 124:6, 125:8, 131:2, 142:18, 146:17, 146:21, 148:13, 148:19, 148:20,	149:20, 151:8, 152:4, 152:21, 153:1, 153:19, 155:6, 155:9, 155:10, 156:1, 156:4, 160:14, 161:12, 162:17, 163:4, 164:1, 164:3, 171:17, 176:16, 178:14, 181:3, 188:7, 190:11, 191:14, 191:19, 192:4, 192:5, 224:6, 224:7, 226:8, 226:9, 226:10, 229:8, 230:7, 236:16, 240:2, 246:14, 246:16, 246:20, 258:13, 259:13, 259:14, 270:5, 274:22, 275:1 one's 60:9 ones 130:22, 230:1, 231:4, 233:16, 234:2 only 12:8, 14:2, 18:3, 37:13, 57:22, 67:6, 76:12, 91:15, 153:11, 155:6, 163:4, 165:6, 189:17, 211:1, 217:8, 231:9, 231:12, 238:10, 251:5, 258:13, 259:9, 259:12, 259:13, 259:14, 265:8 onward 168:11 open 93:9, 93:14, 178:17, 178:21,	262:2, 276:11 operator 7:13 opinion 58:20 opportunity 27:21, 28:20 opposed 20:2, 153:22, 198:14 orange 119:13, 128:6, 133:15, 134:1, 135:12, 136:13, 136:14, 136:21, 139:1, 143:3, 143:11, 143:18, 143:22, 146:16, 146:17, 148:5, 151:18 ordeal 180:6, 204:7, 209:22, 210:2 order 132:8, 155:21, 180:8, 262:10 orders 275:15 organized 44:8 original 26:19, 167:3 other 9:22, 11:20, 12:7, 13:18, 17:15, 29:6, 30:1, 36:5, 37:3, 38:11, 38:12, 44:19, 45:3, 47:13, 49:22, 52:18, 53:3, 54:3, 57:3, 57:4, 57:18, 58:2, 64:18, 67:8, 75:14, 80:7, 81:8, 82:11, 87:18, 92:17,
---	--	--	--

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

306

99:13, 121:7, 124:14, 130:14, 133:9, 176:2, 176:8, 176:19, 177:15, 181:3, 188:9, 188:14, 190:13, 191:16, 197:21, 206:17, 208:15, 208:16, 210:3, 210:15, 213:17, 223:21, 224:6, 224:7, 226:9, 226:10, 231:4, 231:11, 231:14, 232:14, 233:5, 233:8, 233:11, 233:16, 233:21, 234:2, 244:13, 246:14, 251:6, 259:12, 260:12 otherwise 12:22, 278:13 ouch 178:7 out 26:9, 41:21, 64:5, 65:21, 69:8, 69:15, 69:21, 74:7, 77:13, 77:22, 78:5, 78:15, 78:19, 79:15, 79:20, 80:10, 80:13, 80:16, 80:20, 80:21, 81:2, 84:1, 84:4, 90:20, 92:9, 93:16, 98:21, 99:4, 99:10, 112:11, 113:2, 117:5, 126:8, 140:6, 140:12, 152:5, 152:14, 170:2, 170:10, 176:5, 178:20, 181:15, 181:16, 188:10,	195:12, 202:6, 212:13, 224:8, 226:9, 229:7, 229:22, 230:4, 234:15, 238:3, 238:9, 238:14, 238:16, 262:3 outcome 15:10, 15:19 outgrew 161:17 outlaw 240:8 outline 255:4, 272:9 outrage 260:11 outrageous 257:22, 259:6, 262:13, 268:9 outside 15:14, 17:1, 17:10, 17:22, 32:4, 32:17, 33:18, 145:13, 145:17 over 12:7, 12:11, 63:6, 68:18, 85:14, 95:17, 135:16, 136:7, 140:5, 159:7, 176:7, 212:11, 241:16, 250:16 overbroad 31:19 overlap 234:16 overlapped 234:19 overseeing 176:8 oversimplificati- on 244:7, 244:10 own 10:11, 21:17, 22:1, 101:4,	109:7, 110:21, 111:11, 113:18, 124:6, 150:1, 204:9, 265:17, 265:20 <hr/> P <hr/> p-e-e 26:3 pacify 223:21 packs 203:15 page 5:3, 5:8, 6:2, 24:8, 24:9, 24:12, 106:19, 107:4, 107:9, 108:22, 125:12, 125:19, 126:1, 126:2, 132:11, 132:20, 133:4, 135:3, 135:14, 139:10, 140:17, 141:19, 155:10, 157:3, 157:4, 162:4, 163:4, 200:21, 202:4, 208:18, 227:13, 227:17 pages 1:21, 155:8 paid 249:13, 249:20, 250:6 paige 35:21 painful 44:6, 44:9 painting 26:2, 26:4, 26:6, 124:22, 125:21, 126:3, 128:4, 129:8, 131:4, 151:20, 152:13, 153:11, 153:19, 153:21, 156:10, 157:10,	158:3, 162:17, 162:18, 163:14, 163:21, 165:5, 165:17 paintings 26:5, 30:5, 130:21, 131:1, 131:2, 153:8 panic 204:9 paper 148:12 paragraph 24:20, 25:14, 25:19, 25:21, 166:20, 168:8, 169:10, 170:4, 170:22, 226:16 paragraphs 168:10 paralegal 3:15, 8:2, 269:9 paramount 258:15, 260:13 pardon 231:18 parent's 77:13 parents 35:3, 36:5, 42:4, 42:12, 42:21, 57:12, 58:3, 77:22, 79:1, 80:13, 81:2, 82:21 park 81:10 part 21:15, 26:22, 49:22, 52:19, 88:6, 96:17, 129:19, 138:2, 162:7, 183:20, 184:3, 184:12, 185:21, 186:8, 187:11, 203:12, 260:7
---	---	---	--

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

307

partial 36:13	158:2, 158:10, 162:5	perpetrated 230:3	111:18, 112:13, 146:5, 148:16, 175:16, 234:1, 243:1
participate 94:6	pen 148:12	person 19:10, 19:14, 34:17, 68:9, 69:3, 70:4, 81:8, 81:11, 92:9, 95:21, 96:21, 113:2, 160:3, 160:7, 232:19, 233:5, 251:5, 259:12	picture 147:20, 149:1, 149:3, 149:12, 150:19, 151:3, 156:7, 156:12, 156:19, 163:14, 163:15, 165:16
particularly 185:18	penalties 34:4	personally 20:10, 41:8, 66:19, 66:20, 67:5, 233:22	pieces 211:8
parties 276:19	pennington 208:14, 220:8	peter 236:13, 236:18	pill 60:10, 148:6, 203:15
partner 143:18, 143:20, 144:1	penthouse 93:8, 95:1, 166:5, 169:11, 170:15, 171:2, 194:17	ph 93:13, 171:4, 171:6, 171:8, 171:9, 171:11, 173:19, 208:17, 220:4	pills 123:22, 124:9, 203:16
partners 161:6, 161:8	penthouses 92:6, 92:11, 92:12, 92:18, 172:5, 219:13	perceive 224:7	pin 193:8, 193:15, 194:6
parts 53:3, 88:5	people 231:11, 231:14	percent 32:6, 70:4, 72:4	pivot 113:14
party 217:19, 217:21, 276:18, 278:13	perceives 224:7	phased 177:14	place 14:20, 94:22, 100:4, 133:8, 143:22, 164:12, 165:7, 209:22, 225:1, 260:9
pass 71:19, 101:18	perfect 43:3, 155:22, 164:11	phone 30:2, 102:9, 102:10, 103:6, 103:7, 148:12, 150:16, 150:18, 201:17, 201:21, 247:10	plaintiff 1:5, 1:10, 2:6, 3:3, 3:12, 4:5, 4:9, 7:20, 15:2
passage 25:11, 26:22, 27:10	perhaps 13:11, 49:12	photo 148:22, 156:9, 156:17, 228:5	plane 122:13, 122:15
passed 70:20, 71:18, 72:8, 72:20, 73:4, 73:16, 73:22, 74:8, 74:12, 74:15, 82:3	period 23:18, 36:20, 37:2, 37:15, 39:13, 76:3, 80:11, 85:14, 86:8, 88:10, 95:18, 98:4, 98:5, 120:7, 143:19, 234:14, 260:4	photograph 5:18, 147:15, 148:17	planet 7:14, 259:12, 269:14
passing 35:21	periodically 93:15	photographed 152:9	planned 255:17, 271:11
passion 244:13	periods 59:14, 59:15, 86:13, 87:5, 87:13	physical 43:11, 57:3, 57:10, 57:17, 131:7, 145:11, 226:17, 229:13	planning 41:21
past 112:3, 217:9, 246:12	perjury 34:5	physically 56:19, 85:15,	please 7:15, 8:6, 8:8, 8:22, 9:2, 9:21, 10:2, 10:3, 12:3, 12:21,
pause 273:14	permanent 36:11, 83:3		
paying 181:7			
peace 87:19			
pee 26:3, 26:9, 131:4, 152:15, 153:22, 156:9, 156:20, 157:10,			

CONFIDENTIAL

Transcript of Whitney Henriquez

Conducted on February 3, 2022

308

33:10, 101:1, 106:9, 108:11, 111:4, 125:2, 125:12, 126:18, 127:22, 135:17, 137:17, 139:13, 144:12, 147:11, 149:10, 153:7, 154:3, 162:22, 171:14, 179:7, 198:12, 199:12, 200:16, 221:4, 222:22, 227:4, 239:2, 245:4, 254:4, 258:12, 262:5, 265:6, 275:15 pocket 150:1 point 13:5, 24:7, 30:4, 36:18, 36:22, 60:14, 66:20, 74:12, 75:7, 82:9, 92:4, 94:7, 95:5, 95:8, 99:3, 99:10, 99:12, 119:13, 124:6, 137:13, 138:17, 139:22, 143:3, 149:22, 152:9, 164:11, 164:13, 171:8, 173:18, 174:5, 175:22, 177:21, 188:10, 195:1, 202:1, 214:1, 224:21, 225:1, 230:4, 235:15, 238:1, 243:16, 244:14, 246:14, 256:11, 262:7, 272:10, 272:13, 273:12 points 47:11, 112:15, 157:10, 162:7,	162:8 police 266:5 pool 70:18 poor 230:7 portion 26:7 possibility 92:7 possible 66:8, 67:7, 134:6, 224:2 possibly 196:8, 196:11 postured 92:6 pounds 56:2 practiced 265:19 precisely 174:11 predecessor 254:13 pregnancy 11:21 pregnant 9:8, 218:3, 218:19, 255:10, 258:17, 267:15 preparation 16:18 prepare 18:9 prepared 255:2 preparing 17:16, 17:22, 20:21 prescribed 123:16, 123:22, 124:15, 203:20 prescription 58:14, 58:19, 58:22, 60:3, 124:6, 203:17,	205:15 present 4:3, 94:5, 121:14, 148:16 preserving 29:6 presiado 253:2, 254:17, 275:9 press 90:20 pretend 251:14 pretty 40:4, 41:3, 93:10, 93:14, 109:3, 161:14, 168:18, 223:22, 268:9 previous 30:9 previously 86:16, 166:4, 169:9, 180:9, 184:21, 190:10, 194:16 primarily 49:18, 61:13, 93:7, 121:6 prime 54:21 principles 254:9 print 107:7, 107:10 prior 27:22, 28:21, 30:13, 31:3, 95:5, 126:10, 152:18, 153:14, 223:15, 225:15, 254:10 privacy 11:2, 95:22 privileges 77:5 probably 54:21, 56:1,	87:15, 88:4, 250:17, 266:13, 266:16, 275:20 problem 60:4, 83:10, 111:17, 111:20, 111:22, 113:3, 173:2 problems 61:4, 224:5 proceeded 253:4 proceeding 278:13 proceedings 23:2, 24:6, 100:10, 200:8, 253:18, 273:14 produced 102:2, 106:14, 108:22, 131:19, 199:16, 200:14, 239:10 producing 154:17 product 18:13, 20:15, 21:4, 21:12, 32:2, 32:14, 33:16, 34:10, 274:18 production 101:5, 148:14, 220:22, 227:10, 262:8 progression 161:15, 162:1 pronoun 90:9 pronounce 275:5 pronounced 275:7 proper 132:8 properly 260:9 property 148:6
---	--	---	--

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

309

protect 215:20	197:3, 255:15	227:13, 228:10, 240:8, 241:12, 242:3, 248:4, 254:2, 254:17	27:1, 27:7, 27:10, 83:17, 83:20, 102:16, 107:12, 109:10, 109:16, 111:5, 152:14, 202:19, 222:2, 228:13, 240:12, 241:20, 242:8, 248:10, 257:5
psychedelic 67:1, 117:9, 118:6	Q quantify 45:18, 59:13, 59:16, 114:17	R	reading 102:14
public 278:4, 278:20	quantifying 56:8	racks 211:7, 211:12, 211:13	reads 104:18
publication 14:21, 23:4	questioning 269:5	raise 8:8, 259:15	ready 276:5
published 15:15	questions 12:11, 106:22, 107:14, 113:17, 251:22, 252:7, 253:4	raised 198:20, 251:7	real 83:13, 222:3
puffiness 138:11	queuing 131:18	raising 93:1	realize 29:17, 30:13, 31:4
puffy 138:5	quick 83:9, 83:13, 159:6, 168:6, 199:21, 222:3	rambling 140:11, 140:15	realized 23:16, 29:16, 30:4, 30:15, 30:22, 130:7, 130:13
pull 146:9, 221:3, 267:12	quicker 270:3	ran 112:16	really 56:7, 82:5, 83:7, 88:1, 96:20, 104:5, 132:14, 140:11, 140:14, 160:3, 168:9, 177:21, 190:12, 205:22, 256:19, 256:20, 266:7, 266:19
pulled 180:22, 181:1, 181:12, 195:12, 198:19	quickly 44:7, 70:19, 83:7, 92:17, 100:3, 100:15, 120:14	rapport 229:8, 230:14	reason 78:13, 96:17, 161:22, 201:20, 244:18
pulling 24:5, 180:11, 180:19, 182:17, 182:21	quiet 147:9, 173:13	rate 272:11	reasons 31:17, 89:16, 89:17, 112:10, 152:5
punch 186:22, 191:4, 194:14, 233:14	quite 177:6, 249:21	rather 12:4, 26:8	receive 154:18
punched 190:12	quote 104:18, 109:2, 110:20, 111:10, 135:16, 136:4, 136:6, 139:12, 140:18, 152:15, 157:9, 158:9, 158:10, 164:10, 166:5, 167:7, 167:8, 169:21, 181:15, 184:22, 190:12, 208:19, 213:17, 214:8, 214:9, 216:4, 216:5, 216:11, 223:6, 223:8,	rd 202:4, 207:9, 207:15, 207:20, 208:9, 209:4, 211:21, 212:6, 221:17	received 82:4
purposes 11:2		reach 226:9, 246:13	
push 54:8, 146:8, 186:6, 214:19		reached 98:21, 99:4, 181:15	
pushed 54:10, 188:10, 215:13, 256:21		reaching 99:10, 181:16, 202:6, 224:7, 224:8	
put 9:11, 13:10, 18:4, 18:7, 108:2, 126:21, 184:8, 193:8, 195:2, 245:20		react 73:22, 177:13, 188:5	
putting 31:12, 62:22, 87:3, 89:3,		reacted 177:22	
		reaction 187:9, 190:9	
		read 24:10, 26:11,	

CONFIDENTIAL

Transcript of Whitney Henriquez
Conducted on February 3, 2022

310

receiving 76:10	265:5, 266:1, 266:9, 268:3, 268:10, 268:11, 268:13, 269:7, 273:5, 273:9, 274:3, 275:13, 276:10, 276:11, 276:12, 276:14, 276:15, 276:19, 276:21, 277:1	110:6, 135:11, 139:17, 158:16, 165:15, 166:11, 203:18, 205:13, 248:15, 248:18	relevant 31:14, 33:13
recess 100:10, 200:8, 253:18			relief 16:16
recipients 103:11		reflect 22:11, 184:11	reluctance 245:8
recognize 101:11, 125:15, 154:20, 239:11		reflected 201:6	remember 22:22, 30:3, 67:20, 70:4, 82:13, 83:21, 85:8, 86:17, 87:4, 99:10, 121:11, 122:13, 130:7, 141:17, 167:4, 167:7, 172:21, 174:12, 188:12, 192:8, 192:21, 196:18, 197:5, 204:6
recollection 61:19, 89:9, 95:14, 197:14, 197:20, 213:14	recorded 7:3	refresh 242:13	remind 255:19
reconcile 98:22	red 173:16, 174:6, 174:13, 174:20, 175:4, 175:10, 176:1, 176:10, 176:19, 177:13, 177:22, 178:8, 178:16, 178:17, 178:20, 178:22, 195:20, 197:1, 211:10	refused 267:19	remote 4:11, 101:3, 101:8, 101:18, 106:10, 106:16, 125:4, 131:14, 131:21, 147:12, 147:17, 148:10, 154:12, 163:1, 163:6, 199:17, 200:4, 200:19, 221:2, 221:8, 227:5, 239:3, 239:6, 263:1, 263:4, 263:7, 263:19, 265:7, 266:11, 269:13, 269:17, 269:20, 270:1, 270:7, 270:10, 272:4, 273:11, 273:15, 273:19, 274:6
reconciled 143:20, 243:12		regard 262:15	
reconciling 88:6		regarding 14:6, 16:2	
reconvene 259:18		registration 278:22	
record 9:11, 13:10, 14:17, 18:5, 18:7, 24:11, 83:20, 100:8, 100:12, 108:7, 108:18, 126:22, 147:15, 148:3, 169:3, 184:7, 184:8, 184:9, 190:6, 200:7, 200:10, 227:9, 239:9, 253:1, 253:14, 253:15, 253:19, 255:1, 255:15, 256:13, 257:7, 257:8, 257:11, 257:13, 257:14, 257:15, 257:17, 257:20, 258:3, 258:8, 260:18, 260:21, 262:2, 262:14, 263:11, 263:22, 264:2, 264:4, 264:17, 264:22,	redness 196:1, 196:8, 196:17	regrettably 229:4	
	ree 131:3, 151:21, 154:1, 158:18, 159:16, 159:20, 160:10, 163:20, 165:16	regularly 40:4, 41:2	
	ree's 152:14, 159:10	reid 1:22, 7:12, 278:3, 278:20	
	refer 14:13, 105:13, 166:15, 213:16	related 278:12	
	reference 26:4, 105:19, 159:17, 240:20, 243:14	relates 125:8	
	referenced 170:21	relation 94:22, 175:16	
	referred 27:11	relationship 39:16, 39:21, 40:7, 40:13, 41:8, 71:13, 119:3, 119:6, 119:18, 120:8, 120:14, 160:4, 160:5, 161:17, 204:3, 225:2, 238:1, 244:9, 244:11	
	referring 14:14, 14:19, 92:12, 105:14,	relatively 173:13, 185:16, 230:12	
		relatives 37:3	

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

311

repeat 15:6, 230:9	reserved 277:8	review 16:17, 17:4,	261:1, 263:19,
repeatedly 194:15, 195:11	reserves 254:7	101:13, 106:21,	264:15, 266:14,
rephrase 22:15	reside 9:1	107:3, 108:2,	266:17, 269:6,
reported 1:22	resident 83:3	108:8, 155:4	269:21, 270:20,
reporter 7:12, 8:6, 8:7,	respect 60:2	reviewed 17:1, 102:7	271:12, 271:19,
8:16, 12:2,	respectfully 18:5	reviewing 30:1	272:8, 272:9,
12:8, 83:16,	respond 31:21, 96:7,	richards 128:17, 146:14,	273:2, 274:3,
83:18, 159:4,	112:16, 157:3,	146:20	274:19, 275:6,
250:10, 252:17,	202:16, 228:5,	right 8:9, 9:18,	275:7, 275:8
257:18, 258:6,	228:11, 253:22	18:4, 21:14,	rights 277:8
260:20, 262:1,	responds 162:6, 228:10	25:18, 44:10,	rocky 208:14, 220:4,
263:21, 264:11,	response 105:4, 141:19	100:22, 105:3,	220:8
275:14, 275:22,	rest 110:8, 111:5,	107:21, 108:1,	roger 3:17
276:6, 277:3,	197:12, 198:1,	108:4, 108:8,	rolled 148:7, 151:9,
278:3	260:16	108:9, 109:4,	151:14
reporters 252:10, 252:15,	restate 42:17	109:13, 111:21,	romantic 71:13, 119:6,
257:5	reston 3:19	119:2, 120:18,	119:18
reporting 258:4	restored 77:6	123:8, 124:21,	room 13:3, 93:2,
repository 265:8, 269:14	result 74:13, 104:12	129:3, 129:9,	93:12, 121:19,
represent 7:16, 7:19,	results 16:5	129:22, 135:12,	139:2, 190:2,
8:3, 8:20, 24:4,	resume 98:12, 143:6,	138:15, 141:8,	258:21, 260:1,
131:17, 154:8,	256:1	142:7, 149:14,	261:14, 261:22,
274:10	resumed 256:4	152:16, 153:3,	264:20
representation 254:10, 269:3	retail 82:8	155:6, 157:6,	rooms 211:13
representations 262:15, 272:22	retrospect 85:7	157:12, 158:11,	rottenborn 251:21, 253:2
represented 256:13, 268:19,	returned 82:20, 136:14	159:18, 170:21,	rough 43:18, 43:19,
268:20	reveal 274:17	174:19, 181:19,	43:20, 275:16
represents 17:15, 259:10		182:5, 182:7,	roughly 38:21
request 31:19		183:18, 184:10,	route 112:11
research 96:9		184:13, 188:20,	routinely 241:9
resembling 204:6		190:21, 191:3,	rpr 278:20
reserve 127:5, 127:7		191:11, 192:7,	rudnick 2:9, 2:17, 3:6
		192:11, 192:16,	rule 251:2
		192:19, 194:12,	
		197:11, 201:7,	
		202:7, 218:18,	
		238:22, 241:12,	
		242:4, 244:15,	
		244:21, 245:11,	
		247:21, 249:21,	
		252:19, 254:7,	
		256:10, 258:1,	
		260:5, 260:17,	

CONFIDENTIAL

Transcript of Whitney Henriquez

Conducted on February 3, 2022

312

rules	216:19, 216:22,	25:6, 26:1,	210:13, 217:7,
251:3	217:17, 223:1,	26:9, 38:21,	217:8, 217:10,
ruling	227:21, 229:21,	40:3, 42:2,	217:11, 246:14,
275:1	254:1, 256:1,	43:19, 46:1,	264:17
run	256:18, 258:14,	46:13, 55:18,	says
104:20, 105:8,	259:5, 260:12,	56:1, 58:16,	24:21, 103:10,
109:7, 110:20,	261:1, 261:2,	60:12, 65:10,	104:9, 109:2,
111:11, 111:18,	261:16, 265:3,	70:3, 72:4,	126:2, 139:12,
112:1, 112:2,	265:4, 267:16	77:19, 87:12,	142:6, 148:6,
113:2	saith	88:4, 88:19,	202:12, 241:11,
running	277:7	91:1, 92:1,	241:12
200:3	sam	92:8, 92:11,	scared
rush	254:2	92:18, 93:18,	76:14, 204:9,
275:18, 275:19,	same	95:10, 95:17,	204:13, 206:3,
275:20	22:20, 27:15,	99:5, 104:14,	206:14, 206:15,
s	35:3, 35:10,	112:7, 112:14,	214:14
sad	39:5, 49:3,	112:21, 113:7,	school
43:9, 113:13	51:18, 51:22,	113:12, 116:2,	67:15, 68:1,
safe	52:11, 52:15,	116:21, 118:16,	74:7, 80:15,
195:4, 202:14,	63:16, 64:13,	119:10, 127:6,	80:21, 82:4,
202:16, 203:3	68:9, 69:3,	133:7, 134:8,	83:22
said	77:18, 80:8,	137:16, 137:21,	score
12:3, 15:18,	88:17, 94:15,	146:19, 147:4,	234:18, 234:21,
16:3, 16:5,	109:6, 115:8,	149:6, 151:11,	236:1, 236:7
16:12, 27:12,	116:19, 118:5,	157:9, 158:1,	scratch
65:4, 66:7,	118:8, 122:10,	159:10, 162:4,	196:11
77:2, 90:7,	126:15, 133:8,	171:20, 172:2,	scratched
95:15, 95:18,	157:19, 159:4,	172:13, 173:9,	152:14
96:8, 97:17,	166:13, 167:9,	176:13, 177:4,	scratches
97:22, 110:13,	179:17, 185:13,	177:5, 177:16,	196:9
110:19, 111:10,	187:7, 193:22,	178:7, 204:8,	screaming
120:2, 123:13,	204:1, 234:9,	204:11, 206:2,	166:6, 167:8,
131:3, 137:12,	234:17	206:15, 207:4,	169:11, 174:4,
138:6, 141:2,	samuel	223:6, 224:15,	174:5, 210:13
141:9, 142:3,	2:16, 190:1	225:3, 232:2,	screen
149:11, 151:2,	sara	232:5, 240:1,	101:9, 106:17,
168:18, 172:17,	91:21	242:3, 245:5,	131:22, 147:18,
172:20, 173:22,	saw	245:11, 248:6,	155:11, 163:7,
177:18, 178:13,	42:1, 62:5,	248:17, 262:18	221:9, 239:7
185:15, 188:3,	62:16, 63:8,	saying	scribble
189:2, 196:10,	135:1, 137:18,	12:4, 28:16,	26:9
198:3, 198:4,	145:20, 146:3,	68:8, 135:4,	scroll
205:21, 206:13,	172:14, 177:10,	141:20, 162:9,	222:7, 239:16
207:3, 210:22,	178:15, 196:1,	172:16, 172:19,	scrolling
214:13, 214:14,	197:14, 211:3,	173:14, 174:1,	155:20, 203:1
214:17, 215:2,	211:21, 219:20,	192:3, 192:18,	scuffs
215:11, 216:17,	233:11	202:17, 203:4,	196:8
	say	205:16, 205:22,	seal
	10:1, 24:19,		278:15

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

313

second 102:12, 106:19, 107:4, 107:9, 108:22, 157:4, 227:13, 231:20, 267:4 section 125:8 security 142:19, 146:18, 146:21, 171:18 see 26:20, 27:7, 51:6, 51:11, 52:3, 63:1, 98:21, 101:22, 103:10, 103:15, 104:17, 104:21, 105:5, 105:9, 109:2, 110:7, 126:4, 128:2, 132:16, 135:3, 135:5, 135:10, 135:15, 135:19, 135:21, 136:3, 139:10, 139:14, 140:17, 140:21, 141:21, 142:15, 146:5, 146:7, 146:8, 155:6, 164:9, 164:14, 165:10, 177:6, 177:9, 177:10, 181:1, 181:12, 184:1, 187:5, 187:10, 188:3, 188:19, 189:2, 189:3, 189:7, 189:14, 189:16, 195:22, 196:2, 196:11, 196:12, 200:17, 203:6, 207:17, 208:21, 209:4, 209:11, 209:16, 210:4, 210:5, 210:17, 212:10, 223:1, 227:15, 227:20,	228:2, 228:8, 235:17, 240:17, 247:12, 260:14, 268:22, 269:19, 273:15, 274:20 seeing 63:18, 66:18, 89:21, 101:17, 134:7, 195:19, 196:16, 197:5, 220:20, 265:9, 273:17 seek 186:14 seeks 17:19 seem 177:14, 188:20 seemed 161:16 seems 246:5 seen 53:22, 54:9, 62:3, 63:21, 64:11, 64:16, 64:20, 65:4, 65:5, 65:16, 66:14, 66:22, 67:6, 69:4, 134:12, 134:17, 147:19, 227:1, 229:13, 231:3, 231:9, 231:10, 231:13, 233:12, 233:14, 259:14, 263:1 selfish 160:7 selling 89:19, 95:19 send 229:15, 245:22, 246:7, 246:12, 246:13, 274:14, 274:17 sending 266:13, 266:16	sense 12:21, 45:22, 140:14, 141:11, 141:15, 224:13, 244:16 sent 105:10, 109:22, 133:19, 142:5, 156:7, 156:13, 156:18, 163:15, 165:16, 224:3, 229:10, 229:11, 246:7, 269:8, 272:4 separate 20:17, 26:4, 29:5, 90:1, 90:3, 139:3, 153:21, 220:5, 234:20, 245:7 separated 143:19, 180:4, 195:1 separately 28:8, 94:20 separation 161:15, 162:2 september 225:9 series 99:21, 154:21, 155:3, 230:1, 247:5 serious 166:1, 185:11 serve 62:9 serves 68:5, 75:7, 138:7, 143:8, 175:12, 196:18, 209:10 set 82:3, 128:17, 146:15, 146:20, 147:5, 155:10, 176:2, 176:6 setting 119:16	settle 165:8 seventh 2:19 severed 193:2 severely 193:15, 194:5 sex 237:5, 237:12, 237:18 shaken 76:14, 77:3 shaking 12:4 shall 25:11 sham 268:17, 268:18 share 35:3, 264:1, 266:12 shared 81:7 shawn 144:5, 144:10 shift 34:18 shocked 96:22 shoe 211:12 shoot 228:5 shooting 143:6 short 87:12, 154:13 shorter 172:8 shortly 272:6 shot 238:15 should 48:6, 82:17, 143:15, 251:9, 254:14, 267:17,
--	---	--	---

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

314

269:9, 272:5 shoulder 184:13 shouldn't 223:7, 257:11 shove 181:15, 182:15, 183:1 show 99:21, 101:1, 132:10, 154:4, 199:12, 220:21 showed 129:13, 149:22, 150:15 shower 212:11 showing 131:21, 132:2, 147:17, 163:6, 221:8, 239:6, 241:4, 241:10 shown 123:14 shut 140:18, 142:12 siblings 38:12 sic 144:10, 206:19, 223:2 sick 218:3 side 175:22, 176:8, 177:15 sides 224:6 signature 125:13, 152:14, 277:8 signature-bi6ds 278:19 significant 80:11, 85:9, 87:13 signs 226:17, 229:13	silly 85:7, 103:19, 104:13 similar 187:13 simple 34:1, 224:20 simply 26:9, 43:8 since 207:5 single 32:22 sir 10:12, 10:14, 11:10, 11:13, 11:17, 11:20, 15:8, 24:14, 25:5, 35:1, 36:1, 36:4, 83:18, 92:14, 92:21, 128:12 sis 104:18, 105:5, 105:6, 105:13, 158:9, 159:17, 162:5, 227:14, 227:19, 227:22 sister 14:8, 15:10, 15:18, 16:4, 34:20, 34:21, 35:2, 35:8, 36:22, 40:8, 41:1, 42:21, 43:17, 44:11, 51:5, 60:16, 62:16, 65:5, 69:14, 69:21, 74:14, 80:1, 81:15, 86:7, 91:3, 93:2, 94:14, 96:7, 97:16, 98:7, 105:14, 117:15, 118:12, 119:17, 121:14, 132:21, 134:11, 139:16,	143:8, 146:6, 160:9, 160:17, 184:22, 186:22, 194:14, 204:18, 213:1, 215:6, 217:13, 222:15, 223:14, 225:6, 226:2, 226:17, 229:14, 229:16, 230:5, 230:6, 234:9, 234:12, 235:10, 235:17, 235:22, 243:1, 244:2, 244:20, 244:21, 245:21, 248:22, 251:5, 259:16, 259:17 sister's 113:16, 119:3, 120:7, 225:10, 230:12, 236:18, 249:2, 249:11 sisters 58:2, 84:20, 84:21, 87:6, 213:17 sit 111:22 sitting 58:20, 92:22, 130:17, 138:22, 139:4, 139:8, 193:13 situation 9:9, 88:2, 88:8, 112:13, 177:19, 179:9, 179:16, 195:2, 204:10, 226:11 situations 87:11, 113:6 slammed 195:11 slap 233:15 slapped 86:3 slapping 228:20	slightly 55:19 smack 228:6 smacking 230:2 small 23:1, 82:5, 101:16, 132:14, 176:14 smashing 210:3, 210:11 smoked 66:19 smoking 139:7, 140:15 snort 122:18 sober 59:14 sobrie 171:13 sobriety 59:11 sofa 93:1, 93:11 sold 96:15 solve 268:13, 269:7 some 12:10, 23:9, 26:17, 29:17, 30:4, 37:15, 45:22, 74:12, 95:5, 95:7, 99:12, 113:15, 119:13, 138:7, 138:17, 143:3, 152:9, 161:18, 162:20, 171:8, 173:18, 175:21, 208:20, 214:1, 226:22, 235:15, 238:1, 244:14, 255:16, 260:16 somebody 93:9, 134:7,
---	---	---	--

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

315

153:21, 265:3, 276:9 somebody's 148:12 somehow 91:20, 243:12, 251:15 someone 13:9, 70:6, 79:2, 264:16 something 23:16, 29:16, 45:17, 47:13, 85:18, 90:3, 113:1, 138:16, 148:7, 170:1, 178:15, 183:22, 189:6, 198:3, 198:4, 206:16, 262:18 sometime 119:12 somewhere 177:6, 265:10, 270:2 soon 218:2 sorry 22:15, 26:19, 35:21, 38:10, 42:8, 42:15, 45:17, 45:19, 56:7, 63:6, 64:10, 68:6, 69:1, 82:17, 83:4, 83:5, 83:7, 83:15, 100:21, 101:15, 107:7, 122:1, 147:2, 148:7, 152:7, 153:6, 159:1, 159:2, 163:8, 164:19, 171:13, 171:14, 175:2, 179:14, 182:14, 191:9, 198:9, 201:2, 201:15, 209:17,	209:18, 209:20, 222:2, 222:21, 227:16, 233:9, 234:10, 242:19, 247:9 sort 57:17, 90:22, 138:7 sound 202:14, 264:15 sounded 80:21 sounds 67:21, 249:13 source 96:19 space 93:14, 172:6, 172:7, 176:14 spacing 152:7 sparked 169:13, 169:22 spat 241:1 spats 57:17 speak 12:7, 13:19, 13:22, 14:6, 14:8, 15:4, 25:22, 40:4, 40:6, 41:1, 41:3, 41:7, 69:20, 79:21, 97:16, 170:20, 171:2, 171:5, 217:8, 253:12 speaking 49:19, 86:14, 87:16, 89:5, 102:20, 111:19, 152:5, 206:21, 230:13, 241:2, 255:5, 276:8 speaks 25:8, 26:7, 26:8, 108:7,	108:19 specific 25:18, 42:9, 47:12, 57:19, 58:1, 59:13, 78:13, 88:21, 121:10, 149:2, 161:21, 166:12, 238:21 specifically 12:15, 15:17, 24:7, 36:21, 45:12, 72:1, 78:21, 79:22, 87:2, 89:1, 93:8, 105:18, 117:7, 120:2, 130:5, 138:12, 142:5, 152:11, 174:7, 180:18, 189:3, 196:16, 197:10, 202:12, 212:3, 223:6, 232:19, 243:14, 246:11, 249:6 specifics 14:7, 14:12, 16:10, 31:11, 161:13, 161:21 speculate 217:10 speculation 31:7, 56:4, 59:2, 67:11, 75:5, 76:6, 78:9, 79:18, 90:15, 91:6, 94:1, 94:17 speed 167:17 spell 144:12 spend 17:16, 18:8 spent 17:19, 17:22, 69:5 spews 241:18	spoke 41:14, 41:22, 94:20, 95:6 spoken 86:8 spun 92:9 squabble 105:20, 105:21 square 3:7 stair 209:9 staircase 166:12, 166:16, 176:9, 209:10, 233:21, 243:2, 243:18 stairs 166:16, 168:10, 175:18, 176:2, 176:4, 176:6, 176:15, 180:10, 189:18, 214:20, 215:7, 215:13, 233:11 stalling 102:20, 103:3, 107:16, 107:18, 107:19 stamp 132:2, 163:9, 220:22, 266:17 stand 23:6, 23:10, 23:17, 28:22, 83:5, 83:6, 101:3, 106:10, 125:4, 131:14, 147:12, 154:12, 163:1, 199:17, 221:2, 227:5, 239:3 standing 172:12, 172:15, 174:8, 177:7 start 82:7, 99:14,
---	--	--	--

CONFIDENTIAL

Transcript of Whitney Henriquez
Conducted on February 3, 2022

316

106:18, 133:4, 168:9, 199:22, 200:21, 237:22, 247:8, 247:18, 252:21 started 70:17, 88:19, 88:20, 89:2, 89:3, 104:7, 169:21, 188:8, 238:2, 254:1 starting 24:12, 245:5 state 7:16, 9:1, 9:2, 199:14, 258:12, 264:3, 273:10, 278:1, 278:4, 278:21 stated 89:18, 95:22, 117:19, 162:15 statement 5:14, 25:8, 27:13, 28:21, 29:18, 32:9, 33:3, 34:2, 125:10, 125:16, 127:1, 127:15, 130:16, 151:17, 166:20, 167:1, 167:14, 168:2, 218:1, 218:13, 226:15, 242:22 statements 18:16, 18:19, 19:3, 19:22, 20:1, 20:4, 20:5, 20:11, 20:22, 21:19, 22:3, 22:9, 22:18, 23:5, 29:12, 31:15 stay 39:11, 171:4, 202:2, 244:2, 265:22, 276:10 staying 268:12, 269:7,	273:4 stenographer 83:20, 258:7, 264:5 step 63:6, 180:8 stick 44:10, 223:7 sticks 104:10 still 21:10, 21:12, 27:15, 28:9, 29:8, 32:20, 36:2, 39:11, 39:15, 65:21, 77:21, 107:12, 135:16, 136:5, 136:7, 143:21, 161:19, 171:7, 192:11, 194:6, 194:14, 208:15, 220:5, 221:22, 222:12, 223:15, 225:1, 227:16, 236:15, 244:17, 262:2, 268:10, 277:1 stop 108:9, 108:11, 174:1, 215:6, 253:2 stopped 251:20, 252:2, 252:4 stories 90:19, 95:20 story 104:5 street 2:10 stretch 83:12, 100:5 strike 51:6, 51:12, 54:7, 54:9, 75:22, 132:3, 136:5, 177:10,	182:5, 204:16 striking 188:8, 188:14, 191:1, 215:6 strip 234:21, 235:5, 235:11, 235:17, 236:7 stripper 235:10 struck 44:2, 44:13, 44:20, 177:4, 178:8, 181:17, 182:6, 183:15, 183:18, 185:6, 185:7, 232:12 studied 83:22 studio 148:14 stuff 30:2, 56:8, 250:7, 269:19 subject 77:12, 119:3, 166:1, 212:19 subjected 216:19 submit 19:3 submitted 18:15, 18:18, 19:22, 20:4, 22:10, 22:18, 29:10, 34:2 substance 14:4, 21:8, 22:9, 58:4, 58:9, 61:3, 73:10, 92:2, 207:7, 220:12 substances 58:15, 61:9 successful 179:21 suddenly 184:22	suffered 216:17 suite 2:11, 3:18 summer 14:20, 39:10, 84:2 sun 14:20, 18:20, 33:13 super 84:20 support 79:14, 81:18, 81:20, 98:20, 213:8, 225:6, 241:4, 241:10, 245:9, 245:21 supportive 41:2 suppose 29:9, 67:14, 165:8 supposed 12:17, 32:20 sure 14:18, 22:16, 32:6, 32:20, 56:15, 58:18, 66:13, 70:4, 71:11, 72:6, 77:1, 79:21, 101:14, 102:6, 111:19, 120:1, 128:3, 137:11, 137:12, 138:8, 141:17, 155:4, 161:20, 163:10, 168:18, 169:3, 192:17, 194:18, 195:3, 222:4, 222:5, 223:16, 225:3, 225:16, 230:15, 232:22, 244:19, 244:20, 245:17, 247:17, 263:4 surely 271:16
---	--	--	--

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

37320

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

317

surgery 193:7 surname 37:11, 100:21 surrounding 98:19 suspected 225:17 suspended 74:15, 75:2, 75:9, 76:4, 76:18 suspicious 229:21 sustain 185:11, 185:12 sustained 178:5, 192:12, 195:18 swear 8:6 sweet 240:8 swelling 196:1, 196:8, 196:17, 220:17 swollen 137:10, 137:17, 137:20, 138:3, 195:20, 197:2 sworn 8:12, 20:5, 20:22, 29:18, 32:9, 33:2, 34:2, 278:7	94:22, 97:10, 99:20, 101:13, 102:6, 102:18, 106:5, 114:9, 124:8, 124:14, 126:17, 136:12, 142:16, 142:20, 143:10, 199:21, 200:1, 203:16, 207:18, 214:5, 239:15, 252:9, 252:20, 254:5, 254:14, 255:2, 261:7, 261:10, 263:19, 265:14, 265:16, 270:17, 271:7, 271:9, 271:16, 274:8, 274:10, 276:4 taken 7:4, 123:15, 124:20, 148:17, 148:22, 149:1, 150:10, 150:11, 229:7, 229:22 taking 11:14, 28:21, 60:10, 60:11, 112:11 talented 12:2 talk 12:11, 14:3, 41:17, 92:4, 124:22, 140:5, 143:4, 151:19, 159:7, 172:18, 204:5, 216:18, 226:9, 270:19, 275:2 talked 129:10, 160:17, 247:16 talking 15:6, 92:15, 92:19, 112:11, 140:8, 140:13, 158:17, 168:9,	173:13, 229:8, 230:11, 246:4, 251:19, 265:2, 268:5, 270:5 tall 54:16, 55:22 tampon 122:18, 123:7, 149:14, 149:16 tap 228:7 target 47:12 taste 230:8 tasya 26:3, 26:9, 151:20, 152:15, 156:20, 158:2, 160:9, 160:10, 163:20 team 95:16, 96:9 technically 65:22, 210:1 technician 4:11, 23:20, 101:3, 101:8, 101:18, 106:10, 106:16, 107:8, 125:4, 131:14, 131:18, 131:21, 147:12, 147:17, 148:10, 154:12, 162:21, 163:1, 163:6, 199:17, 200:4, 200:19, 221:2, 221:8, 221:12, 227:5, 239:3, 239:6, 263:1, 263:4, 263:7, 263:19, 265:7, 266:11, 269:13, 269:17, 269:20, 270:1, 270:7, 270:10, 272:4, 273:11, 273:15, 273:19,	274:6 teenagers 65:21 tell 8:22, 14:16, 15:17, 22:8, 22:17, 33:1, 56:9, 56:18, 66:6, 68:16, 69:14, 72:19, 73:9, 84:22, 91:22, 98:2, 117:7, 119:14, 130:13, 139:12, 181:2, 192:19, 207:6, 208:19, 212:15, 214:18, 215:3, 215:5, 215:12, 215:19, 216:3, 216:10, 217:12, 220:11, 238:1, 238:21, 242:5, 242:7, 245:14, 246:15, 271:19 telling 95:20, 96:21, 142:12, 164:22, 192:16, 222:14, 244:19, 244:21 tells 12:19, 18:6, 228:4 ten 46:8, 46:22, 49:2, 49:6, 51:21, 100:1, 100:5, 114:19 ten-minute 200:2 term 32:12 terminate 255:17, 256:11, 258:2 terminating 267:1 terms 40:5, 41:6,
T			
table 139:4, 148:4 tactic 90:1 take 9:9, 9:18, 9:21, 10:2, 10:3, 12:2, 13:5, 63:19, 64:16, 64:17, 83:9, 84:7,			

CONFIDENTIAL

Transcript of Whitney Henriquez

Conducted on February 3, 2022

318

86:14, 96:5, 120:1, 220:6 terrified 214:8, 214:13 testified 8:15, 19:9, 31:13, 53:9, 129:1, 129:19, 130:16, 149:21, 153:10, 153:19, 166:4, 166:19, 169:9, 170:3, 170:9, 173:15, 180:9, 181:14, 184:16, 184:21, 188:18, 190:10, 194:16, 219:1, 225:22, 226:14, 229:12, 242:22 testify 8:13, 11:15, 259:3 testifying 11:12, 23:10, 151:17, 152:12 testimony 5:9, 11:19, 17:5, 18:9, 19:15, 20:2, 23:7, 23:10, 23:18, 23:19, 24:5, 26:13, 27:1, 27:5, 27:10, 29:18, 30:16, 30:18, 31:4, 44:12, 65:15, 126:10, 129:2, 129:20, 152:19, 153:15, 166:9, 168:14, 176:17, 179:8, 182:22, 191:17, 193:13, 194:4, 194:7, 194:13, 197:13, 217:3, 233:2, 278:10 texas 42:13, 42:21,	57:12, 80:14 text 5:11, 5:12, 5:16, 5:20, 5:22, 6:3, 6:5, 6:7, 6:9, 6:11, 104:17, 105:10, 106:13, 109:17, 109:22, 132:12, 135:4, 135:15, 135:20, 139:11, 154:9, 154:21, 200:14, 200:17, 207:8, 221:16, 239:9, 240:4, 240:7, 240:18, 242:3, 247:8, 247:16, 247:18, 269:9 texting 133:8, 223:9, 244:1 texts 102:1, 107:11, 131:19, 133:15, 162:20, 227:9, 247:5 th 154:22, 156:8, 157:8, 206:19, 217:18, 247:13, 254:3, 254:12 thank 8:16, 9:14, 10:6, 11:3, 25:10, 25:20, 83:21, 100:7, 101:21, 127:11, 131:12, 132:6, 140:19, 148:11, 163:11, 167:20, 184:18, 200:6, 201:4, 202:12, 218:14, 218:16, 221:13, 221:14, 222:8, 239:17, 248:6, 248:8, 253:11, 253:17,	257:3, 257:9, 263:8, 263:17, 263:18, 264:9, 264:17, 269:22, 272:7, 274:1, 276:6, 277:2, 277:4 thanking 249:18 theirs 276:5 themselves 130:21 thereof 278:14 thereupon 8:10, 278:7 thin 55:14 thing 58:17, 92:8, 96:21, 107:16, 109:8, 110:21, 111:11, 125:11, 188:12, 241:16, 256:6, 256:10, 258:13, 261:11, 268:7, 268:8, 275:21 things 23:6, 26:15, 30:1, 85:3, 85:7, 89:15, 90:20, 91:4, 92:17, 113:1, 140:13, 148:20, 152:22, 153:1, 191:20, 204:11, 208:20, 210:11, 210:12, 217:2, 217:8, 233:15, 253:22, 255:15, 255:16 think 13:10, 13:11, 31:1, 43:7, 49:6, 55:19, 55:20, 67:5,	75:7, 80:11, 92:2, 96:17, 108:18, 111:6, 111:19, 118:16, 135:21, 137:14, 148:19, 148:20, 151:2, 155:9, 168:17, 175:13, 176:1, 177:21, 179:14, 182:4, 182:18, 184:15, 185:17, 187:10, 190:4, 190:10, 195:17, 205:17, 209:12, 224:3, 224:10, 224:22, 234:19, 245:15, 250:5, 250:9, 250:14, 251:14, 256:10, 262:4, 262:14, 263:16, 268:6, 275:4, 275:5 thinking 68:9, 69:4, 77:4, 248:5 third 24:9, 81:11, 139:10, 172:8, 176:7 third-party 254:6 thirteenth 2:10 thought 91:12, 162:9, 204:14, 225:7, 268:3, 276:21, 277:1 thoughts 204:13 threaten 204:4 three 81:19, 155:8, 273:21 three-and-a-half 250:9, 250:13,
---	--	---	--

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

37322

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

319

251:10, 251:21, 252:5, 253:3, 254:21, 254:22, 255:21, 256:5, 265:15, 270:18, 271:10, 272:17, 272:19, 274:8, 274:11 three-year-old 10:17 threw 173:16, 174:12, 175:3, 179:1, 231:15 through 44:7, 92:16, 100:3, 100:14, 106:15, 108:12, 109:4, 132:5, 173:20, 225:4, 227:11 throughout 62:5 throw 174:20, 233:15 thrown 85:17, 86:5 thursday 1:16 times 3:7, 44:4, 46:9, 46:14, 49:2, 49:7, 49:8, 50:11, 50:22, 51:17, 51:21, 52:9, 52:14, 59:18, 60:5, 60:16, 65:5, 65:11, 66:22, 84:7, 84:19, 84:22, 86:17, 87:2, 87:3, 87:10, 88:5, 112:8, 114:13, 114:18, 115:10, 115:12, 116:18, 116:21, 190:13, 203:16,	234:20 timestamp 150:13 tired 255:7, 256:9, 256:15, 259:3, 269:1, 271:1 to-go 148:13 tobacco 151:9, 151:14 today 8:4, 11:12, 11:16, 11:19, 13:20, 14:10, 16:18, 18:9, 58:21, 130:17, 162:16, 172:22, 193:14, 231:5, 233:17, 234:3, 242:22 today's 7:7 toe 227:18 together 70:18, 81:6, 81:19, 85:10, 85:12, 119:13, 121:7, 121:9, 140:4, 143:18, 146:16, 152:9, 220:6 told 57:18, 96:16, 130:6, 151:19, 152:12, 171:4, 214:6, 217:9, 219:3, 220:15, 223:14, 231:5, 233:16, 234:2, 255:11, 265:1 tomorrow 262:8 took 14:19, 143:9, 145:19, 149:3, 156:17, 194:17,	202:17, 203:4, 206:13, 209:22, 255:21, 272:17, 272:18 top 119:14, 132:19, 175:18, 176:14, 184:12, 193:2 total 17:16 touch 276:2 toward 135:2 towards 175:13, 184:12 traced 91:20 transcribe 12:8 transcript 21:15, 24:3, 27:16, 101:7, 106:12, 125:6, 131:16, 147:14, 154:7, 163:3, 199:19, 221:7, 227:8, 239:5, 247:3, 260:8, 262:5, 278:9 transcripts 17:4 transpired 264:8 trash 211:9 traveled 201:20 travis 171:18, 172:20, 173:4, 174:18, 188:11, 199:9, 208:13 travis's 172:21 treatment 186:14 trial 15:5, 15:9,	15:19, 17:5, 19:10, 27:13, 27:22, 33:14, 129:1, 153:2, 153:10 trick 123:14, 149:22, 168:12 tried 26:10, 152:13, 153:11, 164:4, 214:19, 215:6, 243:1 trip 248:7, 248:15, 249:1, 249:8, 249:13, 250:4 triple 162:6, 162:7, 162:8, 241:17 trips 118:17, 249:20 trouble 101:17, 213:9 true 27:14, 28:22, 44:14, 75:2, 75:16, 96:14, 105:14, 105:15, 105:22, 123:2, 128:18, 133:5, 149:12, 156:5, 156:13, 157:18, 158:18, 164:20, 169:16, 170:10, 172:3, 179:10, 182:9, 185:21, 186:15, 192:12, 193:2, 193:8, 213:7, 214:6, 215:4, 219:4, 223:16, 224:16, 226:18, 230:19, 237:16, 238:10, 243:18, 247:16, 249:14, 278:9 trust 82:3, 242:7
---	--	--	---

CONFIDENTIAL

Transcript of Whitney Henriquez
Conducted on February 3, 2022

320

truth 8:13, 8:14, 90:1 truthfully 34:16 try 9:21, 12:3, 12:11, 12:12, 13:6, 44:7, 87:19, 100:2, 180:7, 181:16, 188:16, 244:2, 269:20, 270:3 trying 45:22, 67:20, 138:1, 140:8, 159:6, 167:17, 167:19, 168:5, 168:11, 168:14, 174:3, 177:19, 179:9, 179:16, 180:16, 182:3, 182:5, 183:8, 203:7, 203:21, 204:18, 205:2, 208:20, 215:20, 224:4, 224:10, 225:6, 244:17 tugged 180:17 tumbler 148:13 turn 125:12, 139:1, 148:8, 165:22, 227:3, 252:8, 255:1 turned 82:9 turning 135:14 twice 67:6, 117:19 two 22:22, 23:5, 23:6, 26:5, 58:2, 86:19, 87:6, 97:18,	97:22, 98:2, 98:3, 130:22, 131:2, 135:20, 152:22, 153:8, 155:6, 224:16, 230:16, 244:17, 250:18 type 10:8, 63:1, 154:14 types 85:2 typical 223:22 U ugly 225:18, 227:14, 227:19, 227:22, 230:6 uh-huh 12:4, 129:12, 135:13, 173:6 uh-uh 12:5 uk 5:14, 14:13, 15:4, 15:5, 15:9, 15:16, 15:19, 16:5, 17:5, 18:16, 19:10, 20:1, 20:4, 20:22, 22:10, 22:18, 23:2, 23:11, 33:13, 34:3, 123:13, 125:11, 129:1, 129:20, 148:21, 150:12, 153:2, 153:10, 162:16 unclear 48:4 under 11:12, 22:2, 31:5, 34:4, 62:10, 127:15, 207:14, 237:11,	254:16, 256:9, 278:15 understand 11:11, 12:22, 15:5, 20:3, 20:9, 41:4, 44:9, 110:11, 112:22, 140:9, 183:14, 257:2 understanding 73:2, 73:3, 75:1, 76:17, 109:3, 112:12, 151:12, 161:14 understood 10:4, 11:5, 11:22 unfortunate 263:14, 263:15 unfortunately 121:11 unilaterally 258:2, 264:16 university 39:11 unless 12:15, 12:18, 262:2 unlike 132:7 unmercifully 108:5 unpack 90:5, 188:17 unprofessional 267:12, 268:7, 268:8 unprofessionalism 267:9 unquote 109:9, 111:12, 135:18, 136:7, 139:13, 140:20, 152:15, 157:11, 164:13, 165:9, 166:6, 169:21, 181:18, 185:1, 190:13, 202:18,	216:13, 240:11, 241:19, 242:7, 248:9 unsteady 62:6, 185:17 until 180:3, 180:4, 262:7, 266:1, 268:13, 269:7, 273:7 untrue 89:20 upload 268:14, 268:16, 270:9, 273:10 uploaded 255:3, 262:22, 265:4, 265:12, 265:13, 266:3, 266:9, 267:3, 269:10, 269:12, 270:11, 273:8, 273:19 uploading 270:6 upper 93:13 upset 137:15, 140:9, 140:12, 151:20, 152:6, 152:10, 167:5, 173:22, 204:7, 205:22 upstairs 219:21 use 21:17, 22:1, 26:12, 27:4, 27:16, 63:21, 64:20, 65:4, 65:6, 65:16, 66:14, 66:22, 108:16, 113:17, 118:21, 122:17, 123:7, 126:10, 126:19, 127:1, 150:3, 152:18, 153:17, 166:8,
--	--	--	---

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

37324

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

321

167:13, 187:15 using 118:4, 181:3, 258:4, 269:13 usually 232:20, 274:7 utmost 96:1	verify 266:1, 273:7 version 204:12 versus 93:12 via 7:11, 150:13 victor 37:12, 37:13, 37:20, 38:5 video 7:2, 7:13, 104:6, 104:13, 184:9, 199:22, 257:8, 258:10, 264:4, 276:15 videographer 4:13, 7:2, 8:5, 100:8, 100:11, 199:20, 200:6, 200:9, 250:12, 253:15, 253:19, 257:6, 258:10 videotaped 1:13, 2:1, 277:9 violence 131:11, 137:13, 216:17, 216:19, 232:20, 233:4 violent 85:15, 144:18, 217:13, 231:11, 231:13, 232:14, 243:17 viral 104:6 virginia 1:1, 7:5 virtual 13:2, 190:1, 258:21, 260:1, 261:13, 261:22, 264:20 virtually 1:15, 2:2 visible 138:15, 172:7,	195:22, 196:19, 196:21, 196:22, 211:15 visibly 268:22 visit 84:3, 256:14 visiting 37:4 visits 39:10 visually 187:6 voice 12:8, 210:12 vs 7:4	168:4, 177:5, 194:3, 197:13, 202:13, 222:5, 224:16, 241:13, 252:22, 256:21, 259:2, 261:6, 262:2, 262:18, 262:20, 264:21, 266:2, 271:13, 271:17, 273:9, 276:1, 276:2, 276:7, 276:17 wanted 9:11, 26:6, 80:22, 100:15, 104:20, 105:8, 169:2, 206:1, 207:7, 223:3, 223:16, 225:2, 225:5, 225:7, 240:9, 244:14, 245:10, 245:13, 248:6, 248:8, 253:21 wanting 111:20, 221:10 wants 112:22, 113:1, 202:17, 203:4, 276:10 washington 2:12 wass 24:15, 24:17, 25:10, 25:20, 150:12 way 22:19, 33:1, 44:8, 48:6, 55:5, 75:14, 80:7, 85:17, 94:6, 146:6, 147:5, 148:8, 169:20, 171:6, 181:15, 188:11, 219:4, 229:6, 229:8, 230:7, 230:13, 241:2,
V		W	
va 3:19 vaguely 187:4 validity 90:2 van 26:3, 26:9, 131:3, 131:4, 151:21, 152:14, 152:15, 154:1, 156:9, 156:20, 157:9, 158:2, 158:10, 158:17, 159:10, 159:16, 159:20, 160:10, 162:5, 163:20, 165:16 varied 26:15 variety 31:17 various 47:11, 58:14, 59:11, 82:7, 90:20, 104:1 vasquez 2:15, 7:18, 13:14, 252:22, 257:10, 262:18, 262:20, 263:3, 263:6, 263:8, 263:12, 263:15, 263:18, 264:13, 265:16, 275:18 vehemently 90:21 verified 266:2			

CONFIDENTIAL

Transcript of Whitney Henriquez
Conducted on February 3, 2022

322

243:11 we'll 11:3, 13:6, 21:14, 100:2, 165:7, 252:21, 257:4, 258:4, 274:20, 276:4 we're 57:21, 84:20, 92:15, 92:18, 102:22, 103:2, 124:21, 135:17, 154:16, 188:15, 200:9, 227:12, 246:4, 251:19, 252:9, 253:14, 254:19, 257:6, 257:13, 262:9, 262:16, 264:2, 266:21, 268:10, 268:11, 269:6, 272:14, 273:4 we've 23:21, 121:7, 162:18, 250:5, 252:4 wedding 90:19 week 41:16 weeks 242:20 weigh 54:22, 94:8 weighed 55:6, 56:10 weighs 55:7 weird 138:18, 138:19, 226:22 weirdly 177:14 welcome 10:7, 163:12 went 79:15, 81:14, 112:12, 170:15,	171:1, 171:5, 176:4, 178:20, 219:1, 219:21, 255:9, 260:18, 264:3 weren't 86:14, 161:2, 240:22, 241:4, 244:19, 244:20 wh 5:11, 5:12, 5:16, 6:4, 6:6, 6:8, 6:10, 6:12, 101:5, 106:15, 109:1, 132:5, 135:14, 139:10, 140:17, 199:16, 201:1, 208:19, 220:22, 227:10, 227:13, 239:10, 246:20 whatever 88:2, 104:11, 150:13, 203:17, 210:2, 226:11, 230:2, 230:6, 243:11, 244:18, 252:18, 261:17 whenever 9:19, 13:5, 167:11, 276:5 whether 28:19, 53:17, 75:15, 79:8, 150:14, 181:2, 185:19, 186:3, 186:7, 191:18, 244:15, 245:6, 245:10, 262:21, 270:13 whilst 15:15 whit 95:18, 102:9, 103:7 white 251:18 whitney 1:14, 2:1, 5:3,	5:8, 5:9, 5:15, 6:2, 7:3, 8:3, 8:11, 92:2, 102:14, 106:20, 159:3, 245:16, 256:7, 256:12, 257:16, 261:3, 261:13 whitney's 255:3, 271:15 whoever 149:4, 149:9, 270:6 whole 8:13, 107:13, 107:16, 222:10, 275:21 whore 241:13 wide-open 84:6 willing 245:20, 259:13 winter 84:2 wish 88:22, 140:19, 141:2, 141:9, 141:20, 277:3 withdraw 97:7 within 26:15, 41:16, 93:19, 176:18 without 17:13, 34:14, 124:9, 254:11 witness 5:14, 8:6, 9:18, 18:15, 18:18, 19:22, 20:3, 20:22, 21:18, 22:3, 22:9, 22:18, 25:7, 25:16, 25:17, 26:2, 27:13, 28:21, 29:12, 31:14,	31:21, 32:9, 33:2, 34:8, 54:1, 57:3, 67:9, 83:21, 100:6, 101:2, 101:21, 102:16, 103:1, 107:1, 125:10, 125:16, 127:1, 127:2, 127:14, 130:16, 131:7, 131:11, 148:11, 151:16, 154:4, 155:5, 155:15, 159:8, 164:19, 166:20, 166:22, 167:13, 168:2, 182:14, 184:10, 191:9, 194:12, 197:22, 199:13, 201:15, 206:11, 209:20, 218:1, 218:12, 222:8, 226:15, 232:2, 233:9, 239:17, 242:21, 245:3, 250:22, 251:13, 251:15, 251:18, 256:17, 257:14, 259:9, 259:10, 261:5, 261:9, 262:7, 267:1, 267:12, 272:15 witness's 265:17 witness: 24:22 witnessed 54:7, 54:8, 66:21, 199:2, 231:12, 233:6, 233:22 witnesses 254:7, 265:21 witnessing 66:18, 199:4 woke 170:10
---	--	---	---

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

323

woken 208:6 woman 251:8, 259:16 wondering 88:9, 247:9 wootton 14:21, 18:20 word 264:7 words 9:22, 12:3, 21:17, 22:1, 22:8, 73:9, 92:1, 99:14, 167:6, 167:21, 207:7, 220:11 work 18:12, 20:14, 21:4, 21:11, 32:1, 32:14, 33:16, 34:10, 37:20, 82:6, 113:1, 225:2, 234:16, 235:4, 244:14, 244:18, 245:14, 274:18 worked 23:4, 70:18, 234:8, 234:12, 234:19 workers 37:5, 37:14 working 82:7, 128:18 works 100:2 world 259:15 worried 216:4, 271:21 worse 224:6 worst 158:9, 158:17, 159:11, 162:5 wouldn't 40:6, 56:8,	58:16, 60:12, 68:16, 82:5, 84:22, 87:1, 112:7, 112:14, 112:21, 113:12, 114:17, 116:2, 130:12, 155:19, 160:15 write 20:10, 140:18, 158:8, 164:10, 165:6, 218:1, 248:4 writes 135:16 writing 264:5 written 20:1, 20:22, 23:9, 28:21, 29:11, 29:12, 29:18, 34:2, 258:11 wrong 92:8, 95:20, 96:21, 97:17, 112:12, 149:11 wrote 26:3, 153:22, 156:20, 158:2, 158:11, 193:21, 213:7 y yarelyn 3:5, 7:19 yeah 42:17, 53:2, 56:16, 82:11, 93:13, 105:5, 122:14, 127:12, 133:1, 138:10, 142:4, 155:5, 155:12, 157:20, 159:3, 164:18, 167:19, 168:3, 168:22, 169:4, 171:22, 187:12,	189:22, 194:1, 200:1, 223:5, 250:12, 264:13, 275:19, 276:20 year 38:5, 42:2, 57:22, 77:15, 77:16, 118:18, 119:11, 119:15, 121:10, 121:13, 217:21, 238:16 year-old 230:12 years 38:21, 38:22, 59:15, 84:1, 238:21, 265:19 yesterday 251:20, 253:4, 255:9 york 3:8, 80:2 young 36:21, 48:3, 54:15, 57:16, 57:19, 85:13 younger 64:18, 77:19, 117:20 yourself 7:15, 81:18, 81:20, 120:9, 200:15, 261:7, 261:11 z zoom 7:11, 101:19, 260:19, 260:20 o 0002911 1:7, 7:6 03 253:20 06 257:7 065 109:1	08 135:15 1 100:9 1-8 132:3 10 6:11, 100:12, 246:19, 247:1, 254:12 10036 3:8 102 5:11 106 6:4, 199:16, 201:2 107 5:12, 208:19 109 6:4, 199:16, 201:2 11 154:22, 156:8 11260 3:17 11928 5:19, 147:16 12 1:17, 7:8, 133:4 126 5:14 12670 5:23, 163:5, 163:10 12672 5:21, 154:11 12674 5:21, 154:11, 157:9 13 24:6, 206:19, 225:9 132 5:16
---	---	---	--

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

324

<p>14 6:5, 221:1, 221:5, 221:8 148 5:18 15 6:7, 168:10, 227:4, 227:6, 262:6 155 5:20 16 5:9, 23:22, 24:1, 24:9, 38:22, 129:13, 226:16 164 5:22 17 38:22, 72:5, 77:19, 77:22, 78:15, 79:15, 81:17, 115:19, 117:6 1700 2:13 18 24:12, 38:21, 62:10, 72:5, 81:17, 115:19, 117:6, 140:18, 238:10, 247:13 19 142:6, 254:3 190 56:1</p> <hr/> <p style="text-align: center;">2</p> <hr/> <p>2 100:12, 200:4, 200:5, 251:2 20 46:14, 115:2, 125:12, 157:10 200 6:3, 56:1 2000 206:19</p>	<p>20005 2:12 20012210079 278:22 2006 80:15 201 3:18 2013 24:19, 125:1, 126:3, 129:21, 131:8, 132:13, 146:4, 164:4, 226:16 2014 102:10, 103:8, 154:22, 156:8, 157:9, 158:8, 168:19 2015 88:10, 166:3, 166:11, 166:16, 168:21, 169:5, 192:10, 202:4, 207:9, 207:15, 209:5, 210:6, 212:6, 240:6, 247:13, 249:2 2016 217:19, 219:3, 220:19, 221:17 2019 1:7, 7:6 20190 3:19 202 2:13 2020 5:10, 14:20, 24:6, 30:9, 254:12 2021 254:3 2022 1:16, 7:7, 278:17 2025 278:5</p>	<p>2025.290 254:16 209 3:9 21 82:10, 139:11 2112 24:8, 24:12 212 3:9 22 129:21, 132:13, 139:15, 146:4, 219:2, 220:18, 277:9 2211 2:18 222 6:5 228 6:7 23 5:10, 24:6, 30:9, 202:4, 206:19, 207:9, 207:15, 207:20, 208:9, 209:4, 209:11, 209:15, 210:6, 211:21, 212:6, 221:17 24 157:8 240 6:9 248 6:11 25 5:9, 158:8, 230:11 27 5:17, 132:5 278 1:21 28 135:14 29 139:10</p> <hr/> <p style="text-align: center;">3</p> <hr/> <p>3 135:4, 135:15,</p>	<p>139:15, 200:7, 200:10 3.5 259:9, 271:16 30 115:7, 115:11, 133:4, 140:17, 217:18, 252:11, 252:13, 252:20 31 5:17, 132:5 318 3:20 32 1:17 33 7:8, 24:20, 142:14 34 253:16 36 200:7 37 6:10, 25:19, 25:21, 239:10 38 6:12, 246:21, 273:20 3rd 7:7</p> <hr/> <p style="text-align: center;">4</p> <hr/> <p>4 139:11, 209:11, 253:16 41 269:12, 270:12, 273:8 427235 1:20 4800 3:9 49 6:6, 200:10, 220:22</p> <hr/> <p style="text-align: center;">5</p> <hr/> <p>5 253:20, 257:7,</p>
---	--	--	---

CONFIDENTIAL
Transcript of Whitney Henriquez
Conducted on February 3, 2022

325

277:9		
50	8	
200:4, 200:5,	80	
230:12	143:5, 143:6,	
536	143:9, 146:2,	
2:13	146:17	
57	801401	
100:9, 168:10,	251:2	
168:16, 168:19	8th	
58	131:8	
6:8, 166:20,	9	
168:8, 169:10,	9	
170:4, 227:10	247:16, 269:12,	
59	270:12, 273:8,	
170:22, 227:13	273:20	
5th	92612	
278:16	2:20	
6	949	
6'2	2:21	
54:20, 55:22	9th	
60	240:6	
6:8, 227:11		
600		
2:11		
601		
2:10		
607		
251:2		
63		
5:11, 101:5		
64		
5:13, 106:15		
66		
5:13, 106:15		
6800		
3:20		
7		
7		
140:18, 142:6,		
142:14		
703		
3:20		
7100		
2:21		
752		
2:21		