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# Transcript of Hearing

**Date:** August 6, 2021  
**Case:** Depp, II -v- Heard

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WORLDWIDE COURT REPORTING & LITIGATION TECHNOLOGY

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Transcript of Hearing  
Conducted on August 6, 2021

<p>1 VIRGINIA: 2 IN THE CIRCUIT COURT FOR FAIRFAX COUNTY 3 -----x 4 JOHN C. DEPP, II, : 5 Plaintiff,: 6 v. : Case No. CL2019-0002911 7 AMBER LAURA HEARD, : 8 Defendant.: 9 -----x 10 11 Hearing on Motions 12 Before the HONORABLE PENNEY AZCARATE, Judge 13 Fairfax, Virginia 14 Friday, August 6, 2021 15 11:59 a.m. 16 17 18 19 20 Job No.: 391237 21 Pages: 1 - 54 22 Transcribed by: Bobbi J. Fisher, RPR</p>	<p>1 A P P E A R A N C E S 2 ON BEHALF OF THE PLAINTIFF MR. DEPP: 3 BENJAMIN CHEW, ESQUIRE 4 BROWN RUDNICK, LLP 5 601 Thirteenth Street, NW, Suite 600 6 Washington, DC 20005 7 (202) 536-1700 8 9 ON BEHALF OF THE DEFENDANT MS. HEARD: 10 DAVID MURPHY, ESQUIRE 11 CHARLSON BREDEHOFT COHEN &amp; BROWN, PC 12 11260 Roger Bacon Drive, Suite 201 13 Reston, VA 20190 14 (703) 318-6800 15 16 J. BENJAMIN ROTTENBORN, ESQUIRE 17 WOODS ROGERS, PLC 18 10 South Jefferson Street, Suite 1400 19 Roanoke, VA 24011-1319 20 (540) 983-7600 21 22</p>
<p>1 Hearing on Motions before the HONORABLE PENNEY 2 AZCARATE, Judge, held at: 3 4 Fairfax County Circuit Court 5 4110 Chain Bridge Road 6 Fairfax, Virginia 22030 7 8 9 Pursuant to Docketing, before Adam Schuman, Digital 10 Court Reporter. 11 12 13 14 15 16 17 18 19 20 21 22</p>	<p>1 I N D E X 2 PAGE 3 Hearing on Motion 5 4 5 6 E X H I B I T S 7 (None.) 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22</p>

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2 (5 to 8)

<p style="text-align: right;">5</p> <p>1 PROCEEDINGS 2 (The court reporter was duly sworn.) 3 THE COURT: Okay. All right. So this is 4 the case of Depp versus Heard. We are here on a 5 motion to compel, but I see that I'm signing a 6 consent order now for most of the issues, so thank 7 you very much for working together to get that 8 resolved. And I hope the conciliator helped a 9 little bit on that. 10 MR. CHEW: He very much did, Your Honor. 11 MR. ROTTENBORN: He did, Your Honor. 12 Thank you for appointing. 13 MR. CHEW: Thank you. 14 THE COURT: Good. All right. Okay. So 15 where does that leave us, gentlemen? 16 MR. ROTTENBORN: So, Your Honor, Ben 17 Rottenborn, Woods Rogers, here on behalf of the 18 defendant, Amber Heard. With me today is David 19 Murphy -- 20 THE COURT: Hi, Mr. Murphy. 21 MR. ROTTENBORN: -- also on behalf of the 22 defendant.</p>	<p style="text-align: right;">7</p> <p>1 MR. ROTTENBORN: -- that kind of -- I'm 2 going to work off the chart, the revised chart. I 3 think you have both a redline and a clean copy 4 because we have narrowed, with the help of the 5 conciliator, even on the things that we're arguing 6 about, we have narrowed those a bit. 7 THE COURT: Okay. Great. 8 MR. ROTTENBORN: So Request No. 5 seeks 9 copies of evidence from other litigations in which 10 Mr. Depp has been involved in in the past few years 11 relating to issues that are relevant to this 12 lawsuit. So the first -- the first time we were in 13 front of Judge White on this, we had sought 14 everything from these other litigations, and he 15 said that's too broad, you need to go back to the 16 drawing board and narrow this. 17 So we have narrowed them into what are 18 now 15 subtopics. And I know that seems like a lot 19 and Mr. Depp is going to get up here and say, Well, 20 that's a lot; it's not narrowed. But I think a 21 number of the subtopics shows the narrowing because 22 we're not just issues one global, blanket,</p>
<p style="text-align: right;">6</p> <p>1 So that leaves us with the consent order, 2 which I believe Your Honor has a copy of. 3 THE COURT: Yes. 4 MR. ROTTENBORN: It deals with most of 5 the things. We're also going to withdraw Request 6 No. 22 and 23 for now. 7 THE COURT: 22 and 23. Okay. 8 MR. ROTTENBORN: And so that leaves us 9 with six that are at issue today. 10 THE COURT: 22 and 23. Okay. All right. 11 MR. ROTTENBORN: And, Your Honor, for one 12 of them, I have a binder. If I may approach. 13 THE COURT: Sure. We can get it to you. 14 Thank you. 15 MR. ROTTENBORN: Thank you, Your Honor. 16 You can set that to the side for now. 17 THE COURT: Okay. 18 MR. ROTTENBORN: We're going to start 19 with No. 5. And, Your Honor, we sent -- yesterday 20 morning, we submitted a slightly revised chart to 21 the Court -- 22 THE COURT: Okay.</p>	<p style="text-align: right;">8</p> <p>1 high-level request. We're really drilling down to 2 things that are at issue in this case. 3 Each topic relates directly to this case, 4 and in some instances, has already been compelled. 5 I don't think there's any question that the topics 6 are relevant. And I'm not going to, unless Your 7 Honor wants to, I won't go through each one 8 specifically. But what I'll say is that the Tracey 9 Jacobs deposition -- and Your Honor has heard us 10 refer to that in prior motions -- that proves this. 11 Tracey Jacobs is Mr. Depp's former agent who 12 testified in two of these cases and testified about 13 most of these topics. And we got that deposition 14 the morning of her deposition in this case. 15 There's exhibits that were produced as 16 part of Tracey Jacobs' depositions. There are 17 emails from Disney about their impatience with 18 Mr. Depp, about the drug and alcohol abuse that was 19 impeding his filming of "Pirates of the Caribbean 20 205", that they were fed up, that they had paid 300 21 extras to sit around for a day that he didn't show 22 up to film. That's, you know, highly relevant to</p>

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<p style="text-align: right;">9</p> <p>1 this case. 2 So they say in response -- Mr. Depp says, 3 Well, Ms. Heard wasn't a party to this case -- to 4 these other cases. She wasn't deposed, and she 5 wasn't mentioned in the complaint. That's kind of 6 the lead headline argument in their opposition, but 7 that's not the standard here. 8 The standard here is, you know, what is 9 relevant from those other litigations that's also 10 relevant in this case. And the fact is, Your 11 Honor, Mr. Depp is a -- he's a serial litigator 12 whose pattern in these cases is to blame others for 13 problems that, you know, we believe -- and that the 14 parties in these other cases -- were caused by his 15 own poor decision making. 16 And so these cases have a common theme, 17 and as the Tracey Jacobs deposition showed, there 18 are materials that are relevant from these other 19 cases. So that is what these topics get to. These 20 topics were crafted from the complaint, from 21 depositions, from facts that are at issue in this 22 case. They wouldn't be burdensome to produce</p>	<p style="text-align: right;">11</p> <p>1 know what I'm saying? There's no narrowing factor 2 to that. That's, obviously, overbroad. 3 MR. ROTTENBORN: Well, I think if it were 4 any documents in his possession, but these are 5 documents specifically from these other litigations 6 relating to his drug or alcohol use, which he's 7 been in a pattern of drug and alcohol abuse that's 8 escalated over time, and there's been evidence of 9 that, that it's gotten worse and worse and worse, 10 and we believe that that is a big contributor to 11 these problems that he's having, that he blames on 12 other people and that he sues other people for. 13 We're certainly amenable to narrowing 14 that if Your Honor believes that we should but we 15 believe that -- I mean, there's no question that 16 Mr. Depp's drug and alcohol abuse is relevant to 17 this case, as is his property damage. 18 Topics H through I go to abuse by 19 Mr. Depp of Ms. Heard or others. Again, Ms. Jacobs 20 testified to that in her deposition or testified 21 about that, was asked about that. Plainly at 22 issue.</p>
<p style="text-align: right;">10</p> <p>1 because his lawyers already have all of these 2 documents because he's had the same legal team in 3 part for all of these cases. 4 So very quickly, as a summary fashion, 5 Your Honor, Topics A through C -- and these are the 6 new topics; we have eliminated the former Topic A. 7 But Topics A through C and D, Tracey Jacobs 8 testified directly to, again, about damages. The 9 language of Topics A through C is taken from 10 paragraph 105 of his complaint about the types of 11 injuries he suffered. Topic D, relating to Pirates 12 of the Caribbean; again, Tracey Jacobs' depositions 13 from these other cases and the emails from Disney 14 prove that there's relevant documents out there. 15 Topics E through G go to drug use and 16 alcohol abuse and property damage. Those are 17 plainly at issue in this case. Jacobs testified to 18 those in those depositions. 19 THE COURT: Don't you think they could be 20 narrowed a little? I mean, anything related to 21 Mr. Depp's drug or alcohol use? I mean, what, do 22 we want to start back when he was 18 -- I mean, you</p>	<p style="text-align: right;">12</p> <p>1 Topics L through N relate to violence by 2 Mr. Depp or alleged violence by Ms. Heard, which 3 Mr. Depp alleges in his complaint. Again, Jacobs 4 testified some about that. 5 And then Topic K goes to pre- or 6 post-nuptial agreements, which Mr. Depp has put at 7 issue relating to the divorce payments in this 8 case. 9 So all of these topics are -- we believe 10 we have gone back to the drawing board. We have 11 tried to tailor these as narrowly as we can. We 12 know from the Tracey Jacobs deposition -- and 13 that's the only peek into these other litigations 14 that we have gotten -- we know that responsive and 15 relevant information exists. So the relevance of 16 the topics isn't in question. The question is 17 whether they exist. We know they exist. Tracey 18 Jacobs' deposition proves that they do. Mr. Depp's 19 attorneys have these documents, and we believe that 20 they should have to produce them. 21 We have tried to narrow these as much as 22 we can, Your Honor, while still recognizing that</p>

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<p style="text-align: right;">13</p> <p>1 there are responsive documents there. I know that 2 Mr. Depp says, Well, there are third-party privacy 3 concerns, there's protective orders in these other 4 cases. And as Your Honor knows, those can be dealt 5 with through an order of the court compelling 6 production and if a protective order needs to be 7 entered on the documents here, then that can be 8 discussed as well. So that shouldn't impede their 9 production. 10 But we really tried to narrow these as 11 much as we can because, as in any case, Your Honor, 12 to the extent a party has litigated similar issues, 13 whether or not Ms. Heard was named in the complaint 14 or deposed in those cases, that's not -- that's not 15 the issue. The issue is whether there's relevant, 16 material, discoverable information in those case 17 files. We believe that there is. We know that 18 there is. 19 THE COURT: Okay. All right. 20 MR. ROTTENBORN: So with respect to -- 21 THE COURT: If we can just do No. 5 and 22 let me get the response to that.</p>	<p style="text-align: right;">15</p> <p>1 to the pending plea in bar. It's not -- it dooms 2 the collateral estoppel, res judicata that's it's 3 not -- it's not the argument that we make here. 4 Moreover, just to clarify, before I get 5 to what I hope will be the solution, Ms. Jacobs 6 testified very clearly that she had no evidence 7 that Mr. Depp abused Ms. Heard or anybody else and 8 that she had never spoken with Ms. Heard about it, 9 she had never spoken with Mr. Depp about it. So I 10 wanted to clear that record. 11 Also, Mr. Depp has already produced every 12 single piece of paper relating to any claim that he 13 abused anybody other than Ms. Heard, which is to 14 say zero. There's no woman on the planet who has 15 ever accused Mr. Depp of physical violence. The 16 only person who's been found to have committed 17 physical violence before this litigation is 18 Ms. Heard, who spent a night in jail for beating up 19 her girlfriend, Tasya van Ree. 20 Your Honor, with respect to No. 5 very 21 clearly, Your Honor's read the papers. You know 22 that those two cases -- or at least it's our</p>
<p style="text-align: right;">14</p> <p>1 MR. ROTTENBORN: Of course. 2 THE COURT: Let's just do it that way. 3 MR. ROTTENBORN: Yes. 4 THE COURT: Because I'll forget by the 5 time we get to 23. 6 MR. ROTTENBORN: Okay. 7 THE COURT: All right. Yes, sir. 8 MR. CHEW: Good morning, Your Honor. May 9 it please the Court. Ben Chew for Johnny Depp. 10 And I will -- Plaintiff Johnny Depp. I will 11 restrict my comments right now to No. 5 as to which 12 I believe we have a proposed solution. 13 THE COURT: Okay. 14 MR. CHEW: One which actually goes beyond 15 the steps that Steve Cochran, the conciliator, 16 requested. I do want to -- just as a threshold 17 matter -- just correct a couple of misconceptions. 18 Our argument is not that Ms. Heard was 19 not a party in the case against TMG and against 20 Bloom. Our argument is that those cases are wholly 21 unrelated. 22 Ms. Heard's not being a party is relevant</p>	<p style="text-align: right;">16</p> <p>1 position that those two cases have nothing to do 2 with Mr. Depp's relationship to Ms. Heard. Those 3 were relating to business relationships that 4 started in 1999. In the Bloom case, it was an 5 alleged oral contract between Mr. Bloom and 6 Mr. Depp that took place in 1999. Judge Green in 7 California ruled, as a matter of law, that that 8 contract was illegal. It was an illegal oral 9 contract, void at the discretion of Mr. Depp, who 10 settled for eight figures. 11 The TMG case, I cannot disclose the 12 terms, not also settled favorably. That does not 13 make Mr. Depp a serial litigator nor does it 14 suggest that he was blaming other people for things 15 that were his fault because the Court in both of 16 those cases -- different judges -- concluded that 17 the fault laid with the defendants. 18 But at any rate, to answer the Court's 19 question, we proposed a solution three weeks ago, 20 and Mr. Cochran thought it was a good solution; 21 Ms. Bredehoff did not. So we have gone one better, 22 and here it is. And Mr. Rottenborn is familiar</p>

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<p style="text-align: right;">17</p> <p>1 with this because Ms. Vasquez sent him and 2 Ms. Bredehoff this proposal yesterday. And, 3 specifically, Mr. Depp proposes to produce portions 4 of non-privileged written discovery responses, 5 deposition transcripts, which would include the 6 deposition exhibits to which Mr. Rottenborn alluded 7 as to these six categories: 8 No. 1, Ms. Heard's relationship with 9 Mr. Depp. So any deposition or deposition exhibit 10 that refers to the relationship. And I can 11 represent to the Court that that's going to be a 12 pretty small volume because the cases have nothing 13 to do with that. But they're right; that would be 14 relevant. That's one category. 15 Second category: To the extent not 16 covered by the preceding category, Mr. Depp's and 17 Ms. Heard's respective allegations of physical or 18 emotional domestic abuse/violence. 19 Third category: Any alleged damage to 20 Mr. Depp's career prospects as a result of alleged 21 tardiness or behavior on the set. So that would 22 cover another of Mr. Rottenborn's concerns.</p>	<p style="text-align: right;">19</p> <p>1 Virginia. And I would expect TMG and Bloom's 2 counsel, who want to put this in the rearview 3 mirror, would object to that, as would some of the 4 witnesses. To give you one example, and then I'll 5 subtitle: When we agreed to produce the videotape 6 for Ms. Jacobs in the two prior cases, I thought it 7 was not going to be a problem. It was a big 8 problem because TMG's counsel put in all caps "no 9 way". Eventually, we worked through it, and 10 because I had made a representation to the Court we 11 would do it, we got it done, but I think this would 12 do it -- and I -- we still may get objections from 13 TMG's and Bloom's counsel. We still may get 14 objections from the witnesses, but I think it's 15 going to be -- because I think -- well, I know that 16 the volume of this is not going to be very large; I 17 think it's going to be far lesser problem, Your Honor. 18 THE COURT: All right. Thank you. 19 All right. Yes, sir? 20 MR. ROTTENBORN: Thank you, Your Honor. 21 First, we're not asking him to produce three and a 22 half million documents. I mean, that's why we</p>
<p style="text-align: right;">18</p> <p>1 Fourth category: Any allegations of 2 reputational harm caused by the defendants in the 3 other litigation. We'll produce anything there, 4 although that's not what those cases were about. 5 Any allegations of damage to Mr. Depp's 6 career prospects by the defendants in the other 7 litigation, meaning the TMG and Bloom cases. 8 Now, could it be, if anything -- but, 9 anyway, that's what we would propose to produce. 10 And the final category would be any 11 allegations of drug and alcohol use by Mr. Depp or 12 Ms. Heard. 13 That, I would respectfully submit, covers 14 the waterfront of what would be relevant to this 15 case. And I think it's going to help Ms. Heard in 16 the sense of, if the Court were to order Mr. Depp 17 to produce 3 million documents from those cases, it 18 will be a hornet's nest of very stringent 19 protective orders. It's not a joke. Those are 20 real, binding protective orders in California, 21 which include California's very broad conception of 22 privacy, which is far broader than it is here in</p>	<p style="text-align: right;">20</p> <p>1 tried to narrow these categories. And, you know, 2 respecting Mr. Chew's attempt to try to narrow 3 this, I believe that what he's proposing doesn't 4 give us everything that's relevant to this case and 5 doesn't give us everything that we're asking for, 6 including things like property damage, which is 7 very relevant to this case; that's Topic F; 8 documents related to the finger injury when 9 Mr. Depp cut off his own finger but alleges that 10 Ms. Heard did that in his complaint, that's Topic 11 J. Topic K, anything relating to pre- or post- -- 12 THE COURT: Do you think there would be 13 anything but his finger injury in these other -- in 14 TMG or Bloom? 15 MR. ROTTENBORN: Yeah, he's in the -- 16 there's a YouTube video of him testifying in one of 17 these cases about his finger injury that's out 18 there. And Ms. Jacobs, in her deposition, Your 19 Honor, she -- she testified that he had cut his 20 finger off or that that was what her understanding 21 was. I believe that's on page 3 of our brief, the 22 cite to that. So -- or it was either her testimony</p>

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6 (21 to 24)

<p style="text-align: right;">21</p> <p>1 or it was in the email that was attached. 2 So the bottom line is we don't know 3 what's out there, but I think what Mr. -- what 4 Mr. Depp is -- he's taking the position that these 5 cases weren't ultimately about whether there was 6 domestic violence by Mr. Depp against Ms. Heard. 7 Of course they weren't. They were disputes with 8 other business people. But as the emails from 9 Disney executives to Tracey Jacobs saying, during 10 the filing of Pirates 5, we're fed up with Johnny's 11 behavior, and now he's coming in here and suing my 12 client for \$50 million for causing him to lose 13 Pirates 6, that has to be relevant to -- 14 THE COURT: Well, I mean, isn't that 15 covered under No. 3, damage to career prospects and 16 also allegations of career prospects? 17 MR. ROTTENBORN: And reputational harm. 18 It's covered in part, Your Honor, but what we would 19 ask for is -- 20 THE COURT: What would you add to that? 21 MR. ROTTENBORN: The language that we 22 have used in Topics A and B, which is taken</p>	<p style="text-align: right;">23</p> <p>1 listed that we believe more comprehensively covers 2 things that are relevant to this case. 3 MR. CHEW: Your Honor, very briefly. 4 THE COURT: All right. Yes, sir. 5 MR. CHEW: I just wanted to address the 6 one point. There is one reference in one 7 deposition to the finger. 8 THE COURT: Okay. So we can add that to 9 the list. 10 MR. CHEW: Absolutely. I would -- we're 11 going to produce that anyway because it goes to the 12 relationship between Ms. Heard and Mr. Depp. In 13 other words, we would already think that that would 14 be subsumed in that category because Mr. Depp 15 alleges that it was Ms. Heard who cut off his 16 finger when she threw a broken vodka bottle at him, 17 which is why he missed a day of filming. 18 But, at any rate, that's subsumed in the 19 category of we had proposed that we would produce 20 documents -- anything related to the Amber 21 Heard/Johnny Depp relationship. But it was a 22 straight question from one of Mr. Bloom's attorneys</p>
<p style="text-align: right;">22</p> <p>1 directly from his complaint. So they're saying 2 career prospects and reputational harm, and we're 3 saying you alleged more than that in your 4 complaint. Use that language. Use -- that was -- 5 that was taken -- I'm not sure -- I can't say it 6 was taken verbatim from his complaint, but he had a 7 lot more than just reputational harm, is on 8 paragraph 105 of his complaint. 9 So we believe that, if the Court narrows 10 it, that we track the language of the complaint so 11 that we don't get in here and Mr. Depp is saying, 12 Well, you know, there were another category of 13 damages other than reputational or something like 14 that. We think that that's fair. 15 So we're certainly willing to work on 16 narrowing these further, but, you know, again, 17 we're not asking for all the documents produced in 18 this case. I don't think that third-party privacy 19 concerns can be used to deny Ms. Heard discovery 20 here. There's ways around that. 21 And the six categories that Mr. Chew just 22 mentioned don't cover everything that we have</p>	<p style="text-align: right;">24</p> <p>1 that was asked in kind of a sympathetic way, "Gee, 2 I heard she cut off your finger." 3 But, at any rate, that was subsumed in 4 what we would propose to produce, in any rate -- at 5 any rate. 6 THE COURT: All right. Okay. So let's 7 do this: We'll do the 1 through 6 that you 8 discussed, but you have to add to 3 the language 9 that's used in, I believe, A and B: Loss, injury, 10 or damage to his reputation, loss of roles or 11 economic opportunities; harm to his ability to 12 carry on his profession; embarrassment, 13 humiliation, emotional distress or other financial 14 loss, which is under B -- 5-B. 15 MR. CHEW: Understood, Your Honor. 16 THE COURT: All right. And then we have 17 got to add 7 for property damage because the -- if 18 there is any evidence that the depositions or 19 interrogatories dealing with the property damage as 20 shown in F and G. 21 We have the finger in H -- or, I'm sorry, 22 the finger was in J.</p>

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7 (25 to 28)

<p style="text-align: right;">25</p> <p>1 All right. So you're saying -- you 2 already said the Heard relationship and then also 3 you said physical and domestic abuse. Does that 4 also contain the Heard relationship -- does that 5 contain the efforts to obtain a 6 prenuptial/postnuptial agreement? Would that be 7 encompassing in the Heard relationship, No. 1? 8 That's just a very -- 9 MR. CHEW: I would -- yes, that would, 10 Your Honor. 11 THE COURT: Okay. I just want to make 12 sure. So we have the allegations of abuse and 13 violence taken care of on both sides. We have the 14 drug and alcohol use, was No. 6. All right. Okay. 15 We have got that. All right. 16 MR. ROTTENBORN: Your Honor, can I ask 17 one clarifying -- 18 THE COURT: Sure, sure. 19 MR. ROTTENBORN: We're talking drug and 20 alcohol use, not drug and alcohol abuse? Because 21 that's one of the areas where -- 22 THE COURT: All right. Can we say drug</p>	<p style="text-align: right;">27</p> <p>1 for. 2 These documents were produced in response 3 to our interrogatory, which Judge White compelled 4 last summer, seeking damages information. Judge 5 White said you have to produce facts as to damages. 6 That's reflected in Tab 1 of the binder. 7 In Tab 8 of the binder, at a 9/18/2020 8 hearing, Mr. Chew explicitly said that these 9 documents had been -- Mr. Depp had gotten Mr. White 10 to prepare these documents in response to that 11 interrogatory in which Judge White said we get the 12 facts as to damages. That transcript is in Tab 8. 13 Tab 7 shows where Mr. White, who is 14 Mr. Depp's long-time accountant, was designated as 15 a non-retained expert in this case. And I 16 understand that there's another -- now that the 17 trial was continued, there's another opportunity 18 for expert disclosures, but in early 2021, 19 Mr. White was designated as a non-retained expert 20 in this case, who is expected to testify on the 21 negative impact of the op-ed on Mr. Depp's career. 22 They have also -- and this is also in Tab</p>
<p style="text-align: right;">26</p> <p>1 and alcohol use or abuse for No. 6? 2 MR. CHEW: That's fine, Your Honor. 3 MR. ROTTENBORN: Thank you. 4 THE COURT: All right. Okay. So that 5 takes care of No. 5? 6 MR. ROTTENBORN: Yes, Your Honor. 7 THE COURT: All right. Let's move on to 8 No. 6, is it? 9 MR. ROTTENBORN: Okay. Thank you, Your 10 Honor. No. 6 -- and this is where the binder that 11 I gave the Court is relevant. 12 THE COURT: Okay. 13 MR. ROTTENBORN: I'm not going to 14 laboriously go through it, but I'm just going to 15 refer to some tabs. We have narrowed this from 16 what was initially asked, so in the chart that we 17 submitted yesterday, there was a summary -- a 18 summary of certain financial documents, EWC 1 19 through 52. What we're seeking now are the 20 documents relied to or referred -- relied upon or 21 referred to by Ed White when he generated that 22 summary for Mr. Depp. So that's what we're looking</p>	<p style="text-align: right;">28</p> <p>1 7. Mr. Depp's also disclosed two other damages 2 experts who say that they're going to rely on 3 information from Ed White. 4 So all we're seeking are documents that 5 were relied upon or referred to by Mr. White to 6 prepare this made-for-litigation summary document 7 that, in itself, was generated in response to a 8 compelled interrogatory. This goes to the heart of 9 the case. Again, Your Honor, don't need to remind 10 the Court, but a \$50 million lawsuit brought by 11 Mr. Depp, and now Mr. Depp is trying to pick and 12 choose what he gets to provide to support those 13 damages but then designate experts who can rely on 14 whatever they want. 15 And so what we're seeking is the 16 information underlying these summaries, which 17 Mr. Depp has admitted, were prepared for the 18 purposes of this litigation. Again, this goes to 19 the heart of the case. Mr. Chew is going to say 20 that Judge White denied us this information. 21 That's not accurate. As Tabs -- on the hearing -- 22 in the hearing on September 18th, 2020, this</p>

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8 (29 to 32)

<p style="text-align: right;">29</p> <p>1 document was produced the day before the hearing, 2 and Mr. Depp's attorneys argued they have this 3 document, Your Honor; they don't need some of the 4 other financial information that they're seeking. 5 That other financial information is contained in 6 some of the requests in Tabs 9 and 10 of that 7 binder. It is not the case that this has ever been 8 in front of the Court. 9 In fact, EWC 1 through 52 was used to 10 convince Judge White that information related to 11 the divorce that we had sought at the time, 12 financial information, wasn't going to be 13 compelled. 14 So this has never been in front of the 15 Court. It hasn't been denied, and we believe, you 16 know, frankly, if an expert is going to rely on 17 something and get up here and testify that we ought 18 to be able to take a peek at what the expert looked 19 at and what the expert relied on. 20 THE COURT: Okay. All right. Yes, sir. 21 MR. CHEW: Thank you, Your Honor. With 22 respect to RFP No. 6, the Court should deny it as</p>	<p style="text-align: right;">31</p> <p>1 companies. 2 And while Mr. Rottenborn is correct that 3 Mr. White and EWC are Mr. Depp's manager, that's a 4 relatively recent development. TMG was the manager 5 until it was found out by Mr. White -- Mr. White 6 was the one who discovered the -- I'll put it 7 euphemistically -- the irregularities. 8 Mr. White brought on TMG as principal for 9 two weeks to help him with the transition, and it 10 was during the transition that Mr. White discovered 11 that the former accountant was not helping him 12 discover what was going on in the system but, 13 rather, to delete and to change entries into the 14 system, which is called Datafaction. 15 So in a lot of cases, you know, 16 Mr. Mandel, at one point, testified that the 17 records were in his head. So that's what we're 18 talking about here. 19 At any rate, Your Honor, it would also -- 20 just to respond to what Mr. Rottenborn said, it 21 would contradict the Court's prior rulings, 22 limiting Mr. Depp's obligations for producing his</p>
<p style="text-align: right;">30</p> <p>1 overly broad and previously rejected by this Court. 2 And I will quote Chief Judge White in a moment. 3 Just to back up for a moment, EWC 1 4 through 52 are the income statements and P&amp;Ls from 5 all of Mr. Depp's loan-out companies, showing his 6 income and expenditures, including a breakdown of 7 income by particular films over a ten-year period. 8 Previously -- that's the period that Chief Judge 9 White previously defined as relevant, both from 10 Ms. Heard's tax returns and Mr. Depp's -- and those 11 were all long before Mr. Depp even met Ms. Heard. 12 And just to respectfully correct 13 Mr. Rottenborn on one point, the production was 14 actually pursuant to negotiations between 15 Ms. Heard's California counsel and EWC, which 16 Ms. Heard's California counsel accepted as 17 sufficient and did not, thereafter, move to compel. 18 The production of all the backup as 19 requested would provide no further relevant 20 information and entail a massive volume of 21 documents, virtually everything in EWC's client 22 file for Mr. Depp -- for Mr. Depp and his loan-out</p>	<p style="text-align: right;">32</p> <p>1 tax returns for the past decade, which he did. 2 And at the hearing, Mr. Rottenborn 3 referred to -- and he did the argument. It wasn't 4 Ms. Bredehoff. Mr. Rottenborn correctly referred 5 to EWC 1 through 52, which had just been produced. 6 And his quote was, at page 32, "On the financial 7 statements, Your Honor, we got this information 8 yesterday afternoon that apparently is work product 9 that Mr. White generated. We're entitled to test 10 that work product with the underlying documents, 11 including tax returns that were relied on." 12 The Court rejected that request at page 13 35, stating as follows: "As to the tax documents, 14 it's granted in part and denied in part. The 15 documents which show the post -- the past income 16 are to be produced. The supporting documents are 17 not to be produced. You-all have got a lot of 18 information on income, and this is just one more 19 area where I envision a rehashing of previous other 20 issues. Your question is what's the amount of 21 income, and you can get that -- those parts of the 22 tax return is limited. There's very limited parts</p>

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<p style="text-align: right;">33</p> <p>1 that would show the income." 2 So we would submit that that's 3 essentially the same issue. It was in the context 4 of the tax returns, but it was also with reference 5 to this massive volume of information, and the 6 logic of Chief Judge White's ruling was that 1 7 through 52 would be sufficient, as it's analogous 8 to the redacted tax returns that both parties have 9 submitted. There's simply no reason to justify the 10 massive production and the expense entailed to 11 produce all the backup. 12 THE COURT: All right. Yes, sir. 13 MR. ROTTENBORN: Thank you, Your Honor. 14 Your Honor, when Judge White ruled last 15 year, he was talking about the supporting documents 16 supporting the tax returns. I'll reiterate: EWC 17 was not at issue. It had been produced the day 18 before in response to an interrogatory compelling 19 damages information that they were supposed to 20 produce it by the end of August, and it wasn't 21 produced until September 17th. 22 His ruling had nothing to do with denying</p>	<p style="text-align: right;">35</p> <p>1 arguing over something and one private company had 2 produced a summary made-for-litigation document, it 3 wouldn't be a stretch to ask for the underlying 4 financials that make up that document. 5 THE COURT: All right. 6 MR. ROTTENBORN: So, for the same 7 reasons, we believe they're relevant here. 8 THE COURT: All right. Thank you. 9 All right. So for EWC 1 through 52, it 10 is very comprehensive. As far as the financials, 11 if we could just -- what I would like to say -- 12 other than saying all documents relied upon 13 Mr. White, I think that's overbroad. If you want 14 to say financial documents relied on by Mr. White 15 to do it, I think that would narrow it down. 16 MR. ROTTENBORN: That would be fine with 17 us, Your Honor. 18 THE COURT: Okay. Let's do that. 19 MR. ROTTENBORN: Thank you. 20 THE COURT: All right. That leads us to 21 No. 10. 22 MR. ROTTENBORN: Your Honor, could we do</p>
<p style="text-align: right;">34</p> <p>1 the documents underlying this summary. No one had 2 had any chance to spend any time with that summary. 3 And, you know, I just have to correct this idea 4 that these were produced as part of some 5 third-party discovery in California. At that same 6 hearing, Mr. Chew admitted -- and this is in Tab 8 7 of our binder -- that he was -- he asked Mr. White 8 to -- instructed Mr. White to put these documents 9 together in response to the damages interrogatory. 10 So it was directly in response to the Court's order 11 compelling information there. 12 And, ultimately, Your Honor, what we're 13 looking at is they're going to try to have Ed White 14 come up here and testify as to the negative impact 15 economically on Mr. Depp's career. He's going to 16 cite EWC 1 through 52. We believe that, for 17 cross-examination purposes and for the purposes of 18 rebuttal experts from our side, we have the right 19 to take a look at what documents did you look at 20 when you were generating for the purposes of 21 litigation EWC 1 through 52. I don't think that's 22 a stretch or if this were two private companies</p>	<p style="text-align: right;">36</p> <p>1 20? 2 THE COURT: Sure. 3 MR. ROTTENBORN: Because I'm going to do 4 10, 24, and 25 altogether. 5 THE COURT: I like that idea. Okay. 6 Let's do 20. 7 MR. ROTTENBORN: Okay. 8 THE COURT: Okay. 9 MR. ROTTENBORN: I think we're through 10 the two most time-consuming ones. 11 THE COURT: All right. Okay. 20. 12 MR. ROTTENBORN: All right. This is 13 pretty simple. This seeks payments to this list of 14 people who may be witnesses here in this case. We 15 have taken off the two lawyers that we know of, 16 Laura Wasser and Jake Bloom because Mr. Depp said, 17 Well, payments to them -- you know, we don't want 18 privilege attorney fee information. That's not 19 what we're looking for. If there's other attorneys 20 on there, we can take those off too, but under Rule 21 610 federal -- or state rule of evidence 610, Your 22 Honor, this type of evidence is admissible as</p>

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<p>37</p> <p>1 evidence of bias, payments to these people. 2 Judge White ruled on July 24th, 2020, he 3 said -- and I quote -- "transactions where they 4 might be receiving money, that would be 5 appropriate, I think, if they're going to be 6 potential witnesses or they're being paid or they 7 have a source of income." 8 The fact is, there's a lot of people who 9 rely on payments by Mr. Depp to support their 10 lifestyle or to provide their livelihood. He 11 employs a lot of people to do a lot of things for 12 him, and if those people are going to get on the 13 stand and testify, I think we're entitled to see 14 what he's paid them, and it goes directly to bias 15 and credibility. 16 THE COURT: I mean, that he's paid them 17 and that they're on payroll, I can see the bias, 18 but knowing exactly what they made, is that really 19 relevant? 20 MR. ROTTENBORN: Well, I think so. I 21 think -- 22 THE COURT: I mean, don't they have some</p>	<p>39</p> <p>1 that. But I think, in the abstract, it's hard to 2 answer Your Honor's question. I see what you're 3 saying but -- 4 THE COURT: Okay. 5 MR. ROTTENBORN: Thank you. 6 THE COURT: All right. Yes, sir. 7 MR. CHEW: Very briefly, Your Honor. And 8 we're gratified that Mr. Rottenborn withdrew RFPs 9 22 and 23. That's something Mr. Cochran 10 recommended three days ago and as recently as last 11 night; Ms. Bredehoft insisted on keeping them, but 12 they're now withdrawn. 13 The other one before -- if I could, 14 before we get to 24 and 25 -- RFP 10 is another 15 vastly overbroad RFP that Mr. Cochran recommended 16 that Ms. Heard withdraw, and that's the one that 17 calls "for each defense you have pleaded and 18 response. Please provide all documents supporting 19 or negating each such defense." So we would ask 20 that that one -- the motion to compel be denied as 21 to No. 10. 22 With respect to 24 and 25 --</p>
<p>38</p> <p>1 protection in what -- in their personal income? 2 MR. ROTTENBORN: Well, I think there's a 3 differen- -- I see what Your Honor is saying, and 4 certainly we're happy to -- if there's -- you know, 5 I think -- I think we're entitled to see it. 6 Whether it's entitled to be shown to a jury -- the 7 problem here, Your Honor, is that some people, 8 their job is to follow Mr. Depp around to be -- to 9 do things for him. Other people get -- there's 10 been at least Isaac Baruch who is on this list, he 11 testified, I believe, that he lives in a penthouse 12 that Mr. Depp owns, rent-free. So some of these 13 gifts are in kind. To us, there's a big difference 14 if he paid someone \$100,000 a year versus gave 15 them, you know, a \$2,000 watch. That's, obviously, 16 a big difference in kind, and I think we'd be 17 entitled to know either one. 18 But I think that the amount -- if someone 19 is on Mr. Depp's payroll, I think that's relevant. 20 You know, maybe there's a way that we can do it 21 without getting the full amount, if your primary 22 job is to be employed by Mr. Depp or something like</p>	<p>40</p> <p>1 THE COURT: He's just argued 20, so far. 2 MR. CHEW: I'm sorry? 3 THE COURT: He's only argued 20, so far. 4 No. 20. 5 MR. ROTTENBORN: I'm going to do 10, 24 6 and -- 7 THE COURT: He hasn't done the other ones 8 yet. 9 MR. CHEW: Oh, oh, I'm sorry. 10 THE COURT: I appreciate that you're 11 trying to -- 12 MR. CHEW: I apologize. 13 THE COURT: -- short-circuit everything, 14 but I think -- I think he has an opportunity to say 15 something. 16 MR. CHEW: I was being obtuse. 17 THE COURT: 20 -- he's just at 20. 18 MR. CHEW: Okay. Let me -- 19 THE COURT: Which is all the salary, 20 commissions, bonuses, advances, loans, benefits, 21 perks, expenses. 22 MR. CHEW: Yes, let me find my notes on</p>

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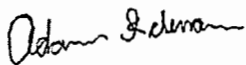

<p style="text-align: right;">41</p> <p>1 that. Beg the Court's indulgence. 2 THE COURT: That's fine. 3 MS. HUNTER: Yes. This is -- as Your 4 Honor alluded to, this is wildly overbroad. I 5 think this is the list of 49 people, one of whom is 6 Mr. Depp's sister, and this is wildly overly broad. 7 There's no threshold. 8 For example, we propounded an 9 interrogatory to Ms. Heard where we proposed a 10 \$5,000 threshold. So if Mr. Depp buys a cup of 11 coffee to -- you know, for someone -- you know, 12 under their proposal, proposed No. 20, that's -- 13 that would have to be disclosed. That would have 14 to find that. 15 So in our proposed interrogatory to 16 Ms. Heard, which is far more targeted to particular 17 people, we had a \$5,000 threshold so she wouldn't 18 have to report. And they have objected to 19 producing anything. So they're saying that 20 that's -- we're not going to produce anything 21 that's overly broad, and that's not before Your 22 Honor today.</p>	<p style="text-align: right;">43</p> <p>1 filing in this case. Well, that was marked 2 confidential, and it contains a lot of private 3 information. 4 Similarly, Ms. Bredehoft and Ms. Heard 5 have filed two entire deposition transcripts, some 6 of which recovered, and so there's a history here 7 of producing sensitive and in some cases 8 confidential information, which makes us all the 9 more concerned about the lack of limits on this 10 Request No. 20. And I'll restrict my comments just 11 to 20 until he gets to those others. 12 THE COURT: All right. Thank you. 13 All right, yes, sir. 14 MR. ROTTENBORN: Thank you, Your Honor. 15 I just have to correct one thing. EWC 1 through 52 16 had been de-designated. Mr. Chew made this 17 argument in his brief, and before the July 2nd 18 hearing, he emailed the court clerk with an apology 19 that he was wrong, that it hadn't been publicly 20 filed improperly. So get up here now and say that 21 we don't respect and protect the order, there's one 22 side that's been sanctioned for not respecting the</p>
<p style="text-align: right;">42</p> <p>1 But not only is there no limit on amount, 2 which there should be, there's no limit on the 3 cause for the gift. Mr. Depp is very generous. 4 Ms. Jacobs, every holiday period, admitted that she 5 would tell Mr. Depp what she expected him to buy 6 her for Christmas, and he would do it. And some of 7 those gifts were very expensive. That's kind of 8 how he is. 9 But we would submit, Your Honor, here, 10 that in addition to being a limit on a threshold 11 amount of the gift or payment, that there be some 12 kind of limit on cause, holiday presents, that kind 13 of thing. 14 And as Your Honor touched upon, there's a 15 real -- there's very real privacy issues here, and 16 again, not to repeat, but California has a very 17 broad law on privacy. These are employees, and 18 they do have standing. And they have real reason 19 to be concerned of the way Ms. Heard has used these 20 documents in the past. 21 EWC 1 through 52, for example, 22 Ms. Bredehoft attached that document to public</p>	<p style="text-align: right;">44</p> <p>1 protective order, and it's not our side. 2 Your Honor, we'd be willing to, I think, 3 agree to some sort of small -- if Your Honor wanted 4 to say \$5,000, but the issue here is any witness 5 who is going to get up and testify for Mr. Depp -- 6 and I'll say, there's a lot of people on this list, 7 but these are people who were identified by 8 Mr. Depp as potential witnesses. 9 Both Judge White has ruled, Rule 610 10 supports the idea that if those people have been 11 paid by Mr. Depp, that goes directly toward their 12 bias and their credibility. So whether they have 13 been given an expensive Christmas gift or whether 14 they're -- like Laura Divenere, who has been -- you 15 know, she was an interior designer, so she was 16 probably paid something by Mr. Depp or whether 17 there's someone like Sean Bett or Stephen Deuters, 18 who are entirely on his payroll and relying on him 19 for their livelihood, I think that we're entitled 20 to test that. It goes directly to bias and 21 creditability. 22 THE COURT: All right.</p>

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<p style="text-align: right;">45</p> <p>1 MR. ROTTENBORN: Thank you, Your Honor. 2 THE COURT: Okay. So for 20, let's limit 3 the threshold to 5,000. 4 And then as far as employee -- when it 5 comes to any salary, commissions, bonuses, 6 advances, that can just be answered in the 7 affirmative. I don't want -- I don't want any 8 monetary amount being given to those because I 9 think they have a right to their privacy in their 10 salary, commissions, and bonuses. On 11 cross-examination, you can ask the questions, but 12 if they aren't on payroll with commissions, 13 bonuses, advances, then you can at least know who 14 those people are. 15 As far as loans, benefits, perks, and 16 expenses, those can be monetary. It's a big 17 difference if you loan somebody 5,000 or loan 18 somebody 100,000, and I agree with that. So those 19 have to be disclosed. All right? 20 MR. ROTTENBORN: Thank you, Your Honor. 21 THE COURT: All right. Now are we going 22 to 10?</p>	<p style="text-align: right;">47</p> <p>1 hearing. It's basically saying, Hey, you have 2 alleged that you're damaged. Tell us -- give us 3 any documents relating to damages. 4 And on page 1 of our brief, Mr. Chew in 5 that argument said, you know, he needed all 6 documents relating to Ms. Heard's damages claim, 7 and those were compelled. You know, if everything 8 has been produced in this case, there shouldn't be 9 a whole lot of work, but, again, we're trying to 10 avoid surprise at trial. We have asked for 11 individual RFPs on -- for counterclaim denials, all 12 documents supporting the denials of counterclaim 13 and affirmative defenses to the counterclaim, but, 14 again, this is designed to cover anything that they 15 deem wasn't covered by that but that would clearly 16 be relevant. 17 And, you know, again, I think that the 18 similar requests have been made at least with 19 respect to damages. We did modify No. 10 to get 20 rid of the "otherwise relating to" language. That 21 was probably too broad. So we said "documents 22 supporting or negating your defense to the</p>
<p style="text-align: right;">46</p> <p>1 MR. ROTTENBORN: All right. I'm going to 2 do 10, in the interest of respecting Your Honor's 3 time -- 10, 24, and 25 generally together. 4 THE COURT: Okay. 5 MR. ROTTENBORN: Because the basic 6 purpose of these requests, Your Honor, is to avoid 7 a surprise at trial. We have -- you know, we 8 have -- both sides have asked a lot of discovery in 9 this case. You know, we have worked through a lot 10 of issues together. As Your Honor has seen, you 11 know, there's been some hotly contested discovery 12 issues too. And what we don't want to have happen 13 is to get to trial and for Mr. Depp's team to have 14 construed requests narrowly so that exhibits show 15 up on the exhibit list that they say, Well, a-ha, 16 you have never asked for it, and discovery is 17 closed. And so that's the purpose of these 18 documents -- these document requests. 19 I'll note that, you know, for 25, this is 20 essentially a comprehensive request for damages. 21 These are pretty similar to the requests that Your 22 Honor compelled of Ms. Heard at the April 30th</p>	<p style="text-align: right;">48</p> <p>1 counterclaim," which gets rid of the "relating to" 2 problem. 3 24 is similar and then 25, again, \$50 4 million lawsuit by Mr. Depp. He needs to prove his 5 damages. We're asking him to produce any 6 documents. And if he's done what he's supposed to 7 do, then there shouldn't be anything else, but 8 we're just trying to avoid surprise. 9 THE COURT: All right. 10 MR. ROTTENBORN: Thank you, Your Honor. 11 MR. CHEW: Thank you again, Your Honor. 12 RFP 10, even as minorly amended, 24 and 25 13 essentially call for all documents relating anyway 14 to the complaint, counterclaim, and the defenses 15 thereto. As Mr. Cochran told Ms. Bredehoft and us, 16 these are vastly overbroad. Rule 4:9 requires 17 reasonable particularity, and Mr. Cochran 18 recommended that all three of those be stricken. 19 And they should be, Your Honor. You have to do a 20 little better than that in terms of requesting 21 documents. I mean, these document requests could 22 not be more broad than they are.</p>

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1 THE COURT: All right. Anything further 2 on that?	1 THE COURT: That's fine. That's fine.
3 MR. ROTTENBORN: No, other than -- I 4 hesitate to get into an account of what Mr. Cochran 5 has recommended. I could go on about his things 6 that he's recommended, but, ultimately, you're the 7 decider. But he certainly -- he's -- my 8 understanding is different from Mr. Chew's, so 9 that's all I'll say. But, again, I think that 10 these are -- we're just trying to make sure that we 11 get everything they're going to rely on.	2 Did you want your binder back? Because I don't -- 3 MR. ROTTENBORN: We're happy to take it 4 if you don't want it.
12 THE COURT: I understand you're trying to 13 get everything. It's just -- it is supposed to be 14 done with particularity. I think these are -- 15 they're clearly overbroad. I mean, if you used 16 this one, I think I could only have -- you could 17 use -- you'd only need one interrogatory or one 18 request for production of documents because you 19 have got it all included in there.	5 THE COURT: I have a lot of binders. 6 MR. ROTTENBORN: I figured you might not. 7 THE COURT: That's fine. All right. So 8 when is the next hearing we have or do we have 9 another one scheduled?
20 So I think 10, 24, and 25 are overbroad, 21 so I'm going to overrule -- or sustain the 22 objection to those.	10 MR. CHEW: We have a couple of -- 11 Ms. Heard has had the lion's share of motions. 12 THE COURT: Right. 13 MR. CHEW: We do have a couple of motions 14 that we have, we believe, and Mr. Cochran agrees. 15 They're going to be next in the queue. But nothing 16 currently scheduled. We'll work with 17 Mr. Rottenborn.
50	52
1 MR. ROTTENBORN: Yes, Your Honor. 2 THE COURT: Okay. 3 MR. ROTTENBORN: Thank you for your time. 4 THE COURT: So that's fine. I don't need 5 an order right now. If you want to get me an order 6 like you have before and just -- 7 MR. CHEW: That would be fine. 8 MR. ROTTENBORN: We'll do. 9 MR. CHEW: Because I was going to 10 recommend that, for the benefit of transcript, that 11 Mr. Rottenborn and I work well together -- 12 THE COURT: Okay. Good. 13 MR. CHEW: -- I think, and so we're going 14 to order it expedited and -- if we could, please. 15 And then, once we have the transcript, we will get 16 you an order. 17 THE COURT: Sure. 18 MR. CHEW: -- without any fighting or 19 (indiscernible). 20 THE COURT: Sure. That sounds good. 21 MR. ROTTENBORN: Would sometime, like, 22 middle of next week work, Your Honor?	18 THE COURT: Perfect, to get the dates. 19 Okay. Well, perfect. All right. Thank you, 20 gentlemen. 21 MR. CHEW: Thank you, Your Honor. 22 THE COURT: All right. Have a good day.  1 (At 12:45 p.m., the above hearing 2 concluded.) 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22

<p style="text-align: center;">53</p> <p>1 CERTIFICATE OF COURT REPORTER - NOTARY PUBLIC</p> <p>2</p> <p>3 I, Adam Schuman, the officer before whom</p> <p>4 the foregoing deposition was taken, do hereby</p> <p>5 certify that said proceedings were electronically</p> <p>6 recorded by me; and that I am neither counsel for,</p> <p>7 related to, nor employed by any of the parties to</p> <p>8 this case and have no interest, financial or</p> <p>9 otherwise, in its outcome.</p> <p>10 IN WITNESS WHEREOF, I have hereunto set my</p> <p>11 hand and affixed my notarial seal this 6th day of</p> <p>12 August, 2021.</p> <p>13</p> <p>14 </p> <p>15 _____</p> <p>16 Adam Schuman, Notary Public</p> <p>17 for the Commonwealth of Virginia</p> <p>18</p> <p>19 Virginia Notary No. 7929796</p> <p>20 Commission Expires: 7/31/2025</p> <p>21</p> <p>22</p>	
<p style="text-align: center;">54</p> <p>1 CERTIFICATE OF TRANSCRIBER</p> <p>2</p> <p>3 I, Bobbi J. Fisher, do hereby certify that</p> <p>4 the foregoing transcript is a true and correct</p> <p>5 record of the recorded proceedings; that said</p> <p>6 proceedings were transcribed to the best of my</p> <p>7 ability from the audio recording and supporting</p> <p>8 information; and that I am neither counsel for,</p> <p>9 related to, nor employed by any of the parties to</p> <p>10 this case, and I have no interest, financial or</p> <p>11 otherwise, in its outcome.</p> <p>12</p> <p>13 </p> <p>14 _____</p> <p>15 Bobbi J. Fisher, RPR</p> <p>16 NCRA Registered Professional Reporter (RPR)</p> <p>17 Prepared: August 6, 2021</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>	