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JOHN C. DEPP, II and INFINITUM NIHIL

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF LOS ANGELES**

GREGG "ROCKY" BROOKS,

Plaintiff,

vs.

JOHN C. DEPP, an individual; MIRIAM  
SEGAL, an individual; BRAD FURMAN, an  
individual; GOOD FILM PRODUCTIONS  
US, INC., a New York Corporation;  
INFINITUM NIHIL, A Californian  
Corporation; And DOES 1-50,

Defendants.

CASE NO. BC713123

ASSIGNED FOR ALL PURPOSES TO  
HON. HOLLY J. FUJIE, DEPT. 56

**AMENDED DEPOSITION TESTIMONY  
DESIGNATION AND OBJECTIONS**

**FINAL STATUS CONFERENCE:**

DATE: October 7, 2019  
TIME: 8:30 a.m.  
DEPT: 56

**TRIAL DATE:**  
October 21, 2019

**DEPOSITION OF JOHN C. DEPP, II**

PAGE 22, LINE 13 - PAGE 22, LINE 19

OBJECTION: \_\_\_\_\_

PAGE 23, LINE 13 - PAGE 24, LINE 5

OBJECTION: \_\_\_\_\_

PAGE 26, LINE 8 - PAGE 26, LINE 16

OBJECTION: RELEVANCE

PAGE 26, LINE 20 - PAGE 27, LINE 22

OBJECTION: RELEVANCE

PAGE 35, LINE 12 - PAGE 35, LINE 17	OBJECTION: _____
PAGE 38, LINE 21 - PAGE 39, LINE 9	OBJECTION: RELEVANCE
PAGE 41, LINE 3 - PAGE 42, LINE 15	OBJECTION: RELEVANCE
PAGE 48, LINE 20 - PAGE 49, LINE 25	OBJECTION: RELEVANCE
PAGE 51, LINE 19 - PAGE 51, LINE 24	OBJECTION: _____
PAGE 59, LINE 16 - PAGE 60, LINE 21	OBJECTION: CALLS FOR NARRATIVE
PAGE 60, LINE 25 - PAGE 62, LINE 6	OBJECTION: _____
PAGE 66, LINE 23 - PAGE 68, LINE 20	OBJECTION: LACKS FOUNDATION; SPECULATION
PAGE 69, LINE 16 - PAGE 70, LINE 6	OBJECTION: _____
PAGE 70, LINE 18 - PAGE 71, LINE 23	OBJECTION: _____
PAGE 72, LINE 8 - PAGE 72, LINE 19	OBJECTION: _____
PAGE 73, LINE 14 - PAGE 73, LINE 24	OBJECTION: _____
PAGE 74, LINE 12 - PAGE 74, LINE 22	OBJECTION: LACK OF FOUNDATION; SPECULATION; RELEVANCE
PAGE 75, LINE 20 - PAGE 76, LINE 4	OBJECTION: _____
PAGE 76, LINE 24 - PAGE 78, LINE 1	OBJECTION: INCOMPLETE AND MISLEADING—IF ADMITTED, INCLUDE 78:2-79:6
PAGE 86, LINE 14 - PAGE 86, LINE 25	OBJECTION: RELEVANCE
PAGE 93, LINE 13 - PAGE 94, LINE 4	OBJECTION: RELEVANCE
PAGE 100, LINE 9 - PAGE 100, LINE 15	OBJECTION: _____
PAGE 101, LINE 7 - PAGE 101, LINE 20	OBJECTION: _____
PAGE 106, LINE 9 - PAGE 108, LINE 15	OBJECTION: RELEVANCE
PAGE 109, LINE 5 - PAGE 109, LINE 16	OBJECTION: RELEVANCE
PAGE 114, LINE 13 - PAGE 114, LINE 17	OBJECTION: _____
PAGE 115, LINE 14 - PAGE 115, LINE 25	OBJECTION: _____
PAGE 130, LINE 12 - PAGE 130, LINE 14	OBJECTION: _____

PAGE 130, LINE 20 - PAGE 132, LINE 5      OBJECTION: \_\_\_\_\_

PAGE 132, LINE 9 - PAGE 132, LINE 14      OBJECTION: RELEVANCE

PAGE 132, LINE 24 - PAGE 133, LINE 8      OBJECTION: \_\_\_\_\_

PAGE 136, LINE 5 - PAGE 136, LINE 10      OBJECTION: \_\_\_\_\_

PAGE 144, LINE 21 - PAE 144, LINE 25      OBJECTION: RELEVANCE

PAGE 149, LINE 7 - PAGE 149, LINE 24      OBJECTION: RELEVANCE

PAGE 150, LINE 1 - PAGE 150, LINE 18      OBJECTION: RELEVANCE

PAGE 151, LINE 4 - PAGE 152, LINE 12      OBJECTION: RELEVANCE

PAGE 153, LINE 9 - PAGE 154, LINE 3      OBJECTION: RELEVANCE

PAGE 160, LINE 25 - PAGE 161, LINE 16      OBJECTION: \_\_\_\_\_

PAGE 170, LINE 22 - PAGE 171, LINE 12      OBJECTION: RELEVANCE

**COUNTER-DESIGNATION:**

PAGE 78, LINE 2 - PAGE 79, LINE 6      OBJECTION: \_\_\_\_\_

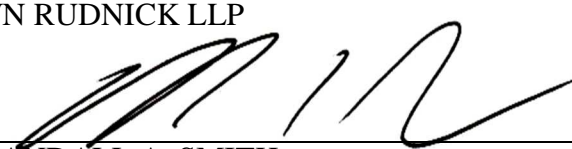
DATED: October 6, 2019

Respectfully submitted,  
 BAKER, OLSON, LeCROY & DANIELIAN  
 In association with:  
 LAW OFFICES OF PAT HARRIS

By: /s/ Arbella Azizian  
 ARBELLA AZIZIAN  
 Attorneys for Plaintiff,  
 GREGG "ROCKY" BROOKS

DATED: October 6, 2019

Respectfully submitted,  
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By:   
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 JOHN C. DEPP, II and INFINITUM NIHIL

- Plaintiff's Deposition Designation
- Defendants' Objection to Plaintiff's Designation
- Defendants' Counter-Designation

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES  
CENTRAL DISTRICT

GREGG "ROCKY" BROOKS,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No. BC713123
	)	
JOHN C. DEPP, an individual;	)	
BRAD FURMAN, an individual;	)	
INFINITUM NIHIL, A Californian	)	
Corporation; And DOES 1-50,	)	
	)	
Defendants.	)	
_____	)	

DEPOSITION OF JOHN C. DEPP, II  
Los Angeles, California  
Wednesday, September 11, 2019

REPORTED BY:

JEAN KIM  
CSR NO. 13555, RPR

JOB NO.  
96357BAK

1 SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

2 CENTRAL DISTRICT

3

4 GREGG "ROCKY" BROOKS, )

5 Plaintiff, )

6 vs. )

)Case No. BC713123

7 JOHN C. DEPP, an individual; )

BRAD FURMAN, an individual; )

8 INFINITUM NIHIL, A Californian )

Corporation; And DOES 1-50, )

9 )

Defendants. )

10 \_\_\_\_\_)

11

12 Deposition of JOHN C. DEPP, II, taken on  
13 behalf of the Plaintiff, at Sunset Tower Hotel, 8358  
14 Sunset Boulevard, Los Angeles, California,  
15 commencing at 1:39 p.m., on Wednesday,  
16 September 11, 2019, before Jean Kim, CSR No. 13555,  
17 RPR, a Certified Shorthand Reporter in and for the  
18 County of Los Angeles, State of California.

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22

23

24

25

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20 ALSO PRESENT:

ADAM WALDMAN  
21 JON SEIDEL, Videographer

22

23

24

25

JOHN DEPP, II - September 11, 2019  
BROOKS VS. DEPP

1 Good Films is. 13:53:13

2 BY MS. ARMINAK: 13:53:13

3 Q Oh, okay. Okay. That production company 13:53:14

4 is not familiar to you, Good Films Production, out 13:53:17

5 of New York? 13:53:21

6 Is that true it's not familiar -- 13:53:24

7 A It's not particularly familiar, no. 13:53:25

8 Q And I think I'm going to give you the name 13:53:37

9 you were looking for. Miriam Segal? 13:53:39

10 A Yes. 13:53:42

11 Q Is that the person you're referring to? 13:53:42

12 A Yes. She was one of the producers. 13:53:44

13 Q Okay. So if I could take a step back and 13:53:46

14 ask who the producers of this film were. 13:53:49

15 Could you tell me who they were. 13:53:51

16 A There was Miriam; Brad Furman, director and 13:53:54

17 producer; there was myself; my sister, Christi; and, 13:54:04

18 you know, those of us at Infinitum, which is my 13:54:16

19 little company. 13:54:20

20 Q That's right. That's right. 13:54:20

21 Is that -- and your sister also is under 13:54:22

22 that umbrella? 13:54:25

23 A Uh-huh. 13:54:26

24 MR. SMITH: Objection. Vague and 13:54:26

25 ambiguous. 13:54:27

JOHN DEPP, II - September 11, 2019  
BROOKS VS. DEPP

1 THE WITNESS: My sister is -- yes. She was 13:54:28  
2 working very closely with production as I was. 13:54:32  
3 BY MS. ARMINAK: 13:54:36  
4 Q And the name of your production company? 13:54:37  
5 A It's Infinitum Nihil. It's a strange one. 13:54:40  
6 Q Where did you get that from? 13:54:44  
7 A In Latin, it means "endless nothing." 13:54:46  
8 Q And are you an employee, as far as you 13:54:51  
9 know, of Infinitum? 13:54:55  
10 A Infinitum? That's a good -- I don't know 13:54:59  
11 if I am. 13:55:02  
12 Q Fair enough. 13:55:02  
13 Are you an officer or a director of the 13:55:03  
14 corporation? 13:55:06  
15 A I assume so. 13:55:13  
16 Q And do you know if Christi is an employee? 13:55:13  
17 A Yes, she is. 13:55:16  
18 Q She is. 13:55:16  
19 And does she have an officer or a director 13:55:17  
20 role in the corporation? 13:55:19  
21 It is a corporation? 13:55:21  
22 A Yes. 13:55:21  
23 Q Yes. 13:55:22  
24 A Yes. My sister, Christi, was basically 13:55:22  
25 running the company. So I guess her -- I don't 13:55:27



JOHN DEPP, II - September 11, 2019  
BROOKS VS. DEPP

1 exactly -- what -- president or vice -- I don't know 13:55:32  
2 what they call it. 13:55:36  
3 Q Fair enough. 13:55:37  
4 And is she still in that role? 13:55:37  
5 A Yes. Pretty much, yeah. 13:55:39  
6 Q Okay. To the extent that the film that you 13:55:45  
7 made has rough cuts, do you know where those rough 13:55:46  
8 cuts would be? 13:55:52  
9 A No. 13:55:53  
10 Q The film "City of Lies," can you tell me -- 13:55:53  
11 you were starring in the movie as well -- 13:55:59  
12 A Yes. 13:56:01  
13 Q -- is that right? 13:56:01  
14 As well as having a producer, executive 13:56:05  
15 producer credit? 13:56:07  
16 A Yes. 13:56:08  
17 Q All right. And you mentioned that 13:56:09  
18 Brad Furman was the director; is that right? 13:56:14  
19 A Uh-huh. Yes. 13:56:15  
20 Q And did he direct the entire movie, start 13:56:16  
21 to finish? 13:56:20  
22 A Yes. 13:56:22  
23 Q It's my understanding that there were times 13:56:23  
24 where you would take over directing certain scenes 13:56:24  
25 or perhaps reshoots. Is that correct? Is my 13:56:30

JOHN DEPP, II - September 11, 2019  
BROOKS VS. DEPP

1 Q And had you -- have you worked with her 13:57:31  
2 since? 13:57:33  
3 A No. 13:57:34  
4 Q No. 13:57:34  
5 Do you intend on working with her again? 13:57:34  
6 A No. 13:57:36  
7 Q No. 13:57:36  
8 It's my understanding that there was a 13:57:37  
9 little bit of a conflict between Ms. Segal and some 13:57:41  
10 other people on set. 13:57:48  
11 Did you ever witness any of that conflict 13:57:50  
12 yourself while on set? 13:57:54  
13 A Oh, yes. 13:57:55  
14 Q Yes. Okay. 13:57:56  
15 Did this conflict plague the set, I guess? 13:57:56  
16 A Yes, it did. 13:58:00  
17 MR. SMITH: Objection. Vague. Vague and 13:58:00  
18 ambiguous. 13:58:02  
19 BY MS. ARMINAK: 13:58:02  
20 Q And at various points, did it disrupt 13:58:03  
21 filming of the film? 13:58:07  
22 A Quite a lot early on, yes. 13:58:08  
23 Q When you say "early on," can you tell me 13:58:10  
24 how soon you felt or you realized that there was 13:58:13  
25 conflict involved with Ms. Segal and the film. 13:58:19

JOHN DEPP, II - September 11, 2019  
BROOKS VS. DEPP

1           A     On my first day of shooting when -- my           13:58:23  
2     first day of shooting, Ms. Segal -- I was in one of       13:58:29  
3     the rooms talking to the director, to Brad, about       13:58:35  
4     the scene we were about to shoot. And Ms. Segal       13:58:41  
5     came into the room in a sort of panicked sort of       13:58:44  
6     screeching, you know, screaming at the director,       13:58:50  
7     "Why aren't we shooting? What's going on?" You       13:58:55  
8     know, that kind of -- very, very panicked.           13:58:57

9                     And that was my first day of the shoot.       13:58:59  
10    And then I -- since I've had a number of years of       13:59:05  
11    experience on sets and stuff, that's -- that's       13:59:12  
12    really an abominable way to -- you never approach       13:59:17  
13    the director that way.                                   13:59:22

14                    A producer -- a producer's supposed to have   13:59:23  
15    those answers, first. But a producer should also go   13:59:27  
16    to the first assistant director, who is running the   13:59:29  
17    set, as opposed to the director. And especially       13:59:35  
18    when he's in conversation with one of the actors       13:59:38  
19    about the scene.   13:59:44

20                    So it was rather a sort of shocking kind       13:59:45  
21    of -- I'd never -- very rarely seen anything like       13:59:51  
22    that happen before.                                       13:59:55

23                    Q     And was this a public sort of thing she       13:59:56  
24    did? A public confrontation she had with Brad?       14:00:01

25                    A     It was certainly in front of me, and she --   14:00:03

JOHN DEPP, II - September 11, 2019  
BROOKS VS. DEPP

1           Did you, for example, yourself take extra           14:08:29  
2   measures to secure your person? Did you bring extra           14:08:31  
3   security guards? Did you have extra protection           14:08:37  
4   yourself while filming this?           14:08:40  
5           A    No. Just the same as normal.           14:08:42  
6           Q    Same as normal.           14:08:44  
7                   And usually when you're on the set -- and           14:08:46  
8   this set was filmed mostly in Los Angeles. Am I           14:08:48  
9   correct?           14:08:52  
10          A    Yes.           14:08:52  
11          Q    Yes.           14:08:52  
12                   When you're in Los Angeles and you're           14:08:53  
13   filming in public places, how many security guards           14:08:54  
14   do you usually -- personal security guards do you           14:09:00  
15   usually have with you?           14:09:01  
16          A    There's usually two.           14:09:03  
17          Q    Two.           14:09:04  
18                   It's my understanding that Jerry Judge --           14:09:04  
19          A    Jerry Judge.           14:09:10  
20          Q    Jerry Judge was with you throughout the           14:09:11  
21   filming of this?           14:09:12  
22          A    Yes.           14:09:13  
23          Q    Yes.           14:09:13  
24                   And he's since retired, or is he still with           14:09:14  
25   you?           14:09:16

JOHN DEPP, II - September 11, 2019  
BROOKS VS. DEPP

1 Q Yes. 14:11:04

2 Are you familiar with the term "body man" 14:11:05

3 or "body woman"? 14:11:07

4 A No. 14:11:09

5 Q No. 14:11:10

6 When I say a "body man," I refer to someone 14:11:13

7 who is always near, within arm's length distance, of 14:11:17

8 the person that's being protected versus the other 14:11:21

9 person who may be driving -- 14:11:23

10 A I see. 14:11:25

11 Q -- who may be making sure the perimeter is 14:11:25

12 safe. 14:11:29

13 Did you have a specific body man with you 14:11:29

14 during the filming of "City of Lies"? 14:11:39

15 A It was always either one or the other or 14:11:40

16 the both of them close by. 14:11:42

17 Q Who drove you? 14:11:43

18 A That would have been Sean. Sean would have 14:11:46

19 been driving. 14:11:48

20 Q Okay. Got it. 14:11:49

21 While on set, while you were filming 14:11:52

22 "City of Lies," at any point, did you come to 14:11:54

23 realize that the film was over budget? 14:11:57

24 A Yes. I was told that they were -- that 14:12:03

25 they were getting into a dangerous arena 14:12:09

JOHN DEPP, II - September 11, 2019  
BROOKS VS. DEPP

1 budget-wise, which of course brings in the 14:12:17  
2 completion bond, which company -- which is the bank, 14:12:22  
3 which is -- so yes. 14:12:27

4 I was -- I was -- had some discussions with 14:12:28  
5 Brad Furman about it. But never with Miriam. 14:12:34

6 Q Okay. And your discussions with Brad, was 14:12:39  
7 Mr. Furman stressed or upset about the over-budget 14:12:42  
8 situation? 14:12:47

9 A Yes, he was. Yes. He was pretty stressed. 14:12:47

10 Q Were you yourself? 14:12:50

11 A No. Not particularly. As long as, you 14:12:54  
12 know -- as long as we were able to do our work, then 14:12:59  
13 it was fine. 14:13:07

14 Having been in those kind of situations 14:13:11  
15 where a film does run over budget, that's -- that's 14:13:13  
16 basically when -- before the completion bond comes 14:13:18  
17 in and starts just pulling pages out randomly out of 14:13:22  
18 the screenplay, that's when you have to go in, for 14:13:27  
19 example, and sort of forensically look through the 14:13:29  
20 screenplay -- go through the screenplay to decide 14:13:35  
21 what's necessary and what's unnecessary. 14:13:38

22 So what we believe will be necessary for 14:13:41  
23 the film and then the scenes that ultimately are 14:13:47  
24 just kind of shoe-leather or establishing -- 14:13:51

25 Q Window dressing? 14:13:56

JOHN DEPP, II - September 11, 2019  
BROOKS VS. DEPP

1 know. 14:14:55

2 A Yes. 14:14:55

3 Q And in order to complete the film, as you 14:14:55

4 mentioned, you're taking scenes out, you're doing 14:14:58

5 all sorts of stuff. 14:15:00

6 Did you yourself feel that crunch in the 14:15:01

7 end where scenes were being limited, taken out, "we 14:15:06

8 can't shoot any more," "time's up," "we can't pay 14:15:10

9 the crew," this type of -- 14:15:13

10 A Yes. I definitely felt that was happening, 14:15:14

11 yeah. Sure. 14:15:20

12 Q Can you give me an estimate of time when 14:15:20

13 you felt that it was going in that direction, that 14:15:22

14 sort of budgeting was occurring on set? 14:15:27

15 A It wasn't very long into the production 14:15:32

16 before there was that kind of panic. And from 14:15:37

17 everything that I was getting from Brad Furman, my 14:15:45

18 job really became to come to work, calm him down, 14:15:53

19 and then let's attack the issues. You know, let's 14:16:02

20 attack the issues that need to be addressed here and 14:16:04

21 trim the fat. 14:16:09

22 And/or if we have to shoot this here and we 14:16:12

23 have to be done by, say, 8:00 or 9:00 and the other 14:16:17

24 location is here, let's send a splinter crew to set 14:16:22

25 up the next setups down there so that all they have 14:16:28

JOHN DEPP, II - September 11, 2019  
BROOKS VS. DEPP

1 to do is essentially -- they've got the dolly set 14:16:33  
2 up. So they just attach the camera, and you're 14:16:36  
3 pre-lit. So we'd -- you have a -- sort of that kind 14:16:40  
4 of thing, which -- 14:16:45  
5 You don't -- I mean when you're in those 14:16:50  
6 situations -- I don't tend to panic in those 14:16:54  
7 situations just because, ultimately, it's -- there 14:16:57  
8 are limitations on every film. So you have to be 14:17:07  
9 ready to take a left turn when you thought you were 14:17:12  
10 going, you know, extreme right. So you have to be 14:17:17  
11 ready to deal with whatever may happen, you know, on 14:17:20  
12 sets. 14:17:27  
13 Q So you didn't necessarily stress out during 14:17:27  
14 those moments, but Mr. Furman was -- 14:17:31  
15 A Quite stressed. 14:17:34  
16 Q -- quite stressed? Okay. 14:17:39  
17 A It seemed to be coming -- in his, you know, 14:17:39  
18 estimation that, you know, everything was coming 14:17:45  
19 from Miriam. 14:17:45  
20 Q Okay. When you say "everything was coming 14:17:46  
21 from Miriam," do you mean the budgeting issues were 14:17:48  
22 coming from her? 14:17:50  
23 A Yes. Yes. Brad was saying, "It's almost 14:17:52  
24 as if she's sabotaging her own" -- "the film just to 14:18:01  
25 be correct." 14:18:11



JOHN DEPP, II - September 11, 2019  
BROOKS VS. DEPP

1 Q Okay. Would it help you if I said it was 14:45:45  
2 sometime in 2017? 14:45:48  
3 A 2017 -- maybe it's -- is it summer-ish? 14:45:54  
4 Q Well, I can help you by telling you -- 14:46:06  
5 A I don't know. 14:46:09  
6 Q -- that the incidents that are alleged in 14:46:09  
7 the complaint are alleged to have happened on 14:46:10  
8 April 12th, the night of April 12th, April 13, 2017. 14:46:14  
9 A Okay. 14:46:18  
10 Q So keeping that in your mind, does that 14:46:19  
11 help you in giving me a time frame as to when 14:46:23  
12 filming began? 14:46:28  
13 A If that was -- April 21st, you say? 14:46:29  
14 Q April 12th. 14:46:33  
15 A April 12th. 14:46:34  
16 Then I'm going to guess February. 14:46:37  
17 Q Great. 14:46:42  
18 A Probably started shooting around February 14:46:43  
19 or -- February, I would say. March. 14:46:45  
20 Q And, sir, immediately prior to shooting 14:46:50  
21 "City of Lies," what film were you shooting? 14:46:53  
22 A Let's see. "City of Lies" -- I can't 14:47:01  
23 remember. 14:47:07  
24 Q Okay. Did you shoot anything in 2016? 14:47:07  
25 A I'm sure I did. I'm trying to remember if 14:47:15

JOHN DEPP, II - September 11, 2019  
BROOKS VS. DEPP

1 I shot "Fantastic Beasts" before that. I think I 14:47:23  
2 did. I believe I did. 14:47:34  
3 Q And prior to "Fantastic Beasts," what was 14:47:37  
4 the film closest to that that you shot? 14:47:41  
5 A It might have been "Murder on the 14:47:45  
6 Orient Express." 14:47:49  
7 Q "Orient Express." Okay. All right. 14:47:50  
8 And immediately after "City of Lies," do 14:47:55  
9 you remember what film you shot thereafter? 14:47:57  
10 A After "City of Lies" -- I don't. I don't. 14:48:01  
11 Seems like it might have been the second "Fantastic 14:48:20  
12 Beasts" sometime after that, I think. 14:48:26  
13 Q That's okay. 14:48:29  
14 A Sorry. 14:48:32  
15 Q That's okay. 14:48:32  
16 Would it be fair to say the second 14:48:33  
17 "Fantastic Beasts" would have been in 2017? 14:48:35  
18 A I believe so. 14:48:38  
19 Q And do you remember what you shot in 2018? 14:48:39  
20 A 2018 -- "Minamata" we did. That was 2019. 14:48:46  
21 Before that was "Waiting for the Barbarians." 14:49:06  
22 Q In 2018? 14:49:16  
23 A I don't know if that's 2018 or 2019. 14:49:17  
24 Q Okay. 14:49:23  
25 A I wish I could remember. 14:49:26

JOHN DEPP, II - September 11, 2019  
BROOKS VS. DEPP

1 Q Okay. And we may backtrack later for some 14:50:33  
2 details. But right now, if we could just get into 14:50:36  
3 that and, you know, get your testimony on that day 14:50:39  
4 if that's okay with you. 14:50:41  
5 A Sure. 14:50:42  
6 Q Great. Okay. 14:50:42  
7 Now, it's my understanding that -- again, 14:50:44  
8 I'll tell you the incident occurred on the night of 14:50:48  
9 April 12th, going into the morning of April 13th. 14:50:50  
10 Is that correct? 14:50:57  
11 A Yes. 14:50:57  
12 Q Do you yourself, as you sit here today, 14:50:58  
13 have independent memory of the incident? 14:51:01  
14 Do you understand my question? 14:51:07  
15 A No. 14:51:08  
16 Q Okay. Okay. It's been over two years 14:51:08  
17 since this night occurred. 14:51:13  
18 A Yes. 14:51:16  
19 Q As you sit here today, putting aside what 14:51:16  
20 you've read as far as the complaint and discovery 14:51:23  
21 and other things that people have told you, do you 14:51:26  
22 yourself, in your mind's eye, remember what occurred 14:51:33  
23 the night of April 12th? 14:51:35  
24 A Yes. 14:51:37  
25 Q You do. Great. 14:51:37



JOHN DEPP, II - September 11, 2019  
BROOKS VS. DEPP

1 on Mr. Brooks. And our -- the discussion that I had 15:00:52  
2 with Mr. Brooks had nothing to do with the location 15:01:04  
3 hours or pressure to get off the street. 15:01:15  
4 I witnessed Mr. Brooks behaving in an 15:01:26  
5 irrational and sort of angry manner in which he 15:01:44  
6 began to -- there happened to be an elderly woman 15:01:51  
7 who I suppose he felt was in his way -- I don't 15:01:59  
8 know. But he -- he was very disrespectful to her 15:02:05  
9 and used harsh words with her as if she had done 15:02:14  
10 something to him. He had -- his words to her were 15:02:24  
11 with great anger and bitterness and -- you know, 15:02:30  
12 there was a lot of poison in it. And it was -- it 15:02:36  
13 was not just, and it was belligerent. 15:02:43  
14 And my reaction to that was to stop that 15:02:51  
15 confrontation. Was to remind him that he was on a 15:02:59  
16 film set and this -- he had no right to speak to 15:03:08  
17 that woman in the way that he was speaking to her. 15:03:13  
18 Had no right to treat her that way. Did he think 15:03:17  
19 that he was something more important than she? That 15:03:22  
20 sort of thing. And he had quite a -- he had quite a 15:03:28  
21 cocky attitude. 15:03:38  
22 BY MS. ARMINAK: 15:03:42  
23 Q I didn't want to interrupt you. 15:03:42  
24 A Yes. 15:03:48  
25 Q And when you -- we'll go back to more 15:03:48

JOHN DEPP, II - September 11, 2019  
BROOKS VS. DEPP

1 details. But when you approached him and stopped 15:03:52  
2 him from speaking -- can I say rudely, 15:03:59  
3 disrespectfully to this woman? 15:04:06  
4 A All of the above. 15:04:08  
5 Q Did he stop mistreating her? Did he stop 15:04:09  
6 what he was doing? 15:04:13  
7 A I had gotten in between. And so he did 15:04:18  
8 stop. And -- 15:04:26  
9 Q Did he apologize -- 15:04:30  
10 A No. 15:04:31  
11 Q -- to the woman? 15:04:31  
12 A No. 15:04:33  
13 Q Did he apologize to you? 15:04:33  
14 A No. 15:04:35  
15 Q Did he respond? 15:04:36  
16 A Yes. 15:04:39  
17 Q Did he respond to you or to the woman? 15:04:39  
18 A He responded to me. 15:04:42  
19 Q Do you remember his response? 15:04:44  
20 A Yes. It was -- not word-for-word, but it 15:04:48  
21 was somewhere in the neighborhood of "fuck you. I 15:04:56  
22 don't have to listen to you" kind of, you know -- 15:05:01  
23 Q Okay. 15:05:03  
24 A -- that sort of thing, you know. 15:05:03  
25 Like I said, he got very cocky. I felt 15:05:06

JOHN DEPP, II - September 11, 2019  
BROOKS VS. DEPP

1 very froggy. 15:05:14

2 Q So he responded by telling the star of the 15:05:15

3 film, "Fuck you. I don't have to listen to you"? 15:05:17

4 A Pretty much. 15:05:22

5 Q And you didn't have him thrown off the set? 15:05:26

6 A No. 15:05:29

7 Q Okay. And in your lifetime of being you -- 15:05:34

8 Do you know what I mean when I say "the 15:05:39

9 lifetime of being you"? 15:05:43

10 A Know all too well. 15:05:43

11 Q Has anybody on a set ever told you "fuck 15:05:45

12 you"? 15:05:49

13 A Yes. Yes. 15:05:51

14 Q Okay. Any production assistant said "fuck 15:05:55

15 you" to you? 15:05:59

16 A No. I had an incident on a film where the 15:06:00

17 filmmaker had intimidated this young French actress 15:06:04

18 who was in the film. He had manipulated her into 15:06:17

19 doing nudity that she was -- that she had been 15:06:20

20 uncomfortable with. His name was Jeremy Leven, and 15:06:23

21 he was the director. 15:06:29

22 He told her that Johnny was very upset that 15:06:29

23 she had decided not to do the nudity and that I 15:06:32

24 thought it was, you know, very important for the 15:06:39

25 film. 15:06:40

JOHN DEPP, II - September 11, 2019  
BROOKS VS. DEPP

1 think" -- "you can't speak to this woman this way. 15:11:08  
2 You can't" -- you know, "Who do you think you are? 15:11:12  
3 Do you think she's less than you? Do you think 15:11:14  
4 you're" -- you know. 15:11:17  
5 I don't -- I have a very -- I don't 15:11:19  
6 tolerate injustice. And especially when there's an 15:11:26  
7 elderly woman who's on a film set as an extra and 15:11:34  
8 she's intimidated already by what's going on. And 15:11:38  
9 then for some reason, this guy just snaps on her. 15:11:43  
10 So I think, if -- seems to me, if he was 15:11:50  
11 willing to do that and he got caught doing that and 15:11:55  
12 I raise attention to what he'd done, it doesn't 15:12:01  
13 surprise me that his response would be something 15:12:09  
14 like that. 15:12:12  
15 I mean I had also -- you know, I'd been 15:12:13  
16 used to -- at that point in my life, I'd been used 15:12:26  
17 to taking some pretty good shots in the media, 15:12:30  
18 and -- 15:12:35  
19 Q Your skin is thick? 15:12:35  
20 A Huh? 15:12:37  
21 Q Your skin is thick now? Thick skin? 15:12:38  
22 A Yeah. Probably. 15:12:43  
23 Q Putting all of that aside, would you agree 15:12:50  
24 with me now that addressing you in that way, 15:12:54  
25 speaking to you in that fashion would have been 15:12:59



JOHN DEPP, II - September 11, 2019  
BROOKS VS. DEPP

1 grounds for him to be removed off the set 15:13:02  
2 immediately? 15:13:04  
3 A Not for me, no. Because I knew there 15:13:09  
4 was -- I mean of course we had time crunches. You 15:13:14  
5 said before, every day, there's a time crunch. And 15:13:19  
6 every day, you're trying to get the crew in and out 15:13:24  
7 so that they can have their lives. 15:13:27  
8 But when you're in a time crunch and you 15:13:29  
9 have to get the work done, there's no time -- 15:13:35  
10 there's no time to -- 15:13:42  
11 Q Hold a grudge? 15:13:44  
12 A There's no time to hold a grudge. 15:13:46  
13 As I said, it's a collaborative effort. 15:13:48  
14 There's no reason to hold a grudge. There's no 15:13:51  
15 reason to -- there was no reason for an argument, 15:13:54  
16 you know, at all. 15:14:00  
17 He needed to calm himself from where he was 15:14:01  
18 going. You know, he was quite frantic about -- I 15:14:09  
19 don't know. You know, the location, we needed to 15:14:15  
20 get out of that location or something. 15:14:18  
21 Q Okay. After he -- can I say that he -- I 15:14:20  
22 mean he says, in lack of better term, "Fuck you. I 15:14:31  
23 don't have to listen to you," and you hear that, 15:14:35  
24 what do you do? What's the next immediate thing 15:14:38  
25 that you do? 15:14:40

JOHN DEPP, II - September 11, 2019  
BROOKS VS. DEPP

1 A The next immediate thing that I do? 15:14:40

2 Q Yeah. Right. You tell him to stop 15:14:44

3 berating this woman. He says to you, "Fuck you. I 15:14:48

4 don't have to listen to you." What do you do? 15:14:50

5 A I said, "Listen" -- as I would say to 15:14:51

6 anybody -- "if you are going to insult, dress down, 15:14:58

7 belittle, if you're going to treat others in this 15:15:16

8 way, we're not going to make it, you know. That 15:15:20

9 doesn't happen." 15:15:29

10 Q And that was your response to his combative 15:15:30

11 "fuck you" to you? 15:15:34

12 A Yes. 15:15:35

13 Q Okay. What was his then immediate response 15:15:37

14 to you? What happened next? 15:15:40

15 A He was just sort of -- honestly, I couldn't 15:15:42

16 tell you. I couldn't tell you. If he were in the 15:15:50

17 room, I wouldn't be able to identify the guy. 15:15:56

18 Q You wouldn't be able to pick him out of a 15:15:58

19 lineup? 15:16:02

20 A No. I wouldn't. 15:16:03

21 Q Okay. 15:16:04

22 A But I'll tell you. He was just sort of 15:16:04

23 standing there chewing gum. You know, he was 15:16:09

24 playing it very cocky as if he wanted some sort of 15:16:15

25 confrontation. 15:16:24

JOHN DEPP, II - September 11, 2019  
BROOKS VS. DEPP

1 Q Did he say anything further to you after 15:16:25  
2 your last statement to him? 15:16:28

3 A Oh, he -- 15:16:32

4 MR. SMITH: Objection. Vague as to time. 15:16:32

5 THE WITNESS: I mean he -- 15:16:34

6 MR. SMITH: Well, let's speak. Are we 15:16:36  
7 focused just on this incident at this moment? 15:16:37

8 MS. ARMINAK: Yes. So the way that I 15:16:39  
9 understand it is Mr. Depp then responds back with, 15:16:42  
10 "If this is how you're going to be, it's not going 15:16:46  
11 to cut it. We're not going to make it." Exactly 15:16:49  
12 what Mr. Depp said, and -- 15:16:51

13 THE WITNESS: Well, there was no time to 15:16:51  
14 argue. We had to shoot. 15:16:53

15 BY MS. ARMINAK: 15:16:55

16 Q There was no time to argue. Yeah. 15:16:55

17 A And he had done something quite ugly with 15:16:56  
18 regards to that elderly woman. You know, an elderly 15:17:00  
19 black woman who was homeless. 15:17:03

20 Q Right. 15:17:05

21 A And it's not going to do anybody any good 15:17:07  
22 to get into a, for lack of a better term, pissing 15:17:10  
23 contest about what's what. We need to get this 15:17:19  
24 shot, and we need to get out of here. 15:17:23

25 And the last -- so I just went back to -- 15:17:30

JOHN DEPP, II - September 11, 2019  
BROOKS VS. DEPP

1 "let's get the shot. Let's get what we need." 15:17:34

2 Last I saw him, you know, he was doing his 15:17:38

3 sort of tough guy Leo Gorcey New York gumshoeing 15:17:40

4 kind of thing, and he, you know, mumbled -- mumbling 15:17:47

5 about something or other. Yeah. He was still 15:17:50

6 behaving somewhat goofy. 15:17:55

7 Q In that interaction, he -- 15:17:58

8 A Yeah. When I basically split and went back 15:17:59

9 to making the movie, which is our primary focus 15:18:02

10 then, I had been sitting with a script supervisor, 15:18:08

11 Emma, by the monitors. And that's when the whole 15:18:15

12 thing went down. 15:18:25

13 Q Okay. So I don't want to interrupt your 15:18:26

14 answers, but I do want to understand specifically 15:18:30

15 what happened in those few seconds. So I'd like to 15:18:35

16 go backward a little bit if that's okay with you. 15:18:39

17 A Sure. 15:18:41

18 Q As you've testified, he says, "Fuck you. I 15:18:44

19 don't have to listen to you," or somewhere in that 15:18:49

20 neighborhood. And you then explain to him "this 15:18:51

21 behavior is not going to go further on this set"? 15:18:58

22 A "Your behavior towards this woman is 15:19:00

23 unacceptable." You know, that kind of stuff. "This 15:19:09

24 does not happen on a set, and I don't ever want to 15:19:11

25 see it again" -- that sort of stuff, basically. 15:19:15

JOHN DEPP, II - September 11, 2019  
BROOKS VS. DEPP

1 Q Right. 15:19:17

2 A And then just made sure that the woman was 15:19:17

3 all right. That she was cool. And then she was 15:19:20

4 cool, and I went back to -- I believe I went back to 15:19:24

5 the monitors with Emma or over to Brad. I can't 15:19:28

6 remember. 15:19:31

7 Q Okay. 15:19:31

8 A But we were shooting with someone who had 15:19:31

9 done me a favor by flying in from Atlanta with 15:19:37

10 three hours' notice. He's a rap star called -- his 15:19:42

11 name is Killer Mike, and he's with a group called 15:19:49

12 Run the Jewels. And so he was filming that night. 15:19:53

13 We'd also had Biggie's -- Christopher 15:19:59

14 Wallace's mom, Voletta Wallace, had been on set that 15:20:04

15 day as well. And my character's widow and kids were 15:20:10

16 on the set that day. 15:20:17

17 So it was a quite a big day, you know. 15:20:19

18 And, you know, certainly the last thing that I felt 15:20:31

19 that Voletta Wallace or anyone needed to see was an 15:20:33

20 extra of any stature, of any -- anyone being sort of 15:20:42

21 dressed down for no reason or treated as scum. It 15:20:52

22 was -- if there was any day to not have that, 15:20:59

23 certainly that was the day. 15:21:03

24 Q Understood. 15:21:04

25 Earlier you testified that you came in and 15:21:04

JOHN DEPP, II - September 11, 2019  
BROOKS VS. DEPP

1 put yourself physically between Mr. Brooks and this 15:21:08

2 extra who was being berated by Mr. Brooks. 15:21:12

3 I just want to clarify. You physically 15:21:17

4 used yourself as a barrier between Mr. Brooks and 15:21:19

5 this extra? 15:21:23

6 A I put myself, my body, my being, in between 15:21:24

7 Mr. Brooks and the woman, yes. 15:21:31

8 Q The woman. 15:21:33

9 And when you turned around to make sure -- 15:21:34

10 and I'll ask you. Did you turn around to make sure 15:21:36

11 that the woman was okay? Did you make contact with 15:21:39

12 her? Turn around? 15:21:42

13 A I don't remember if I turned around to make 15:21:49

14 contact with her. 15:21:50

15 Q How did you make sure she was okay? 15:21:53

16 A Simply asking her, "Are you okay? Do you 15:21:55

17 need anything?" You know, there wasn't a whole lot 15:22:00

18 more exchanged. She said she was okay. But she was 15:22:08

19 freaked out. 15:22:15

20 Q And you then walked over to where you were 15:22:16

21 previously behind the camera? 15:22:19

22 A After -- yeah. After we spoke, I went back 15:22:22

23 over to -- by the monitors to look at the shot that 15:22:28

24 Brad was setting up. 15:22:35

25 Q You noticed that Mr. Brooks -- well, I'll 15:22:36

JOHN DEPP, II - September 11, 2019  
BROOKS VS. DEPP

1 ask you. 15:22:40

2 As you were asking the lady if she was 15:22:41

3 okay, what do you remember Mr. Brooks doing? 15:22:45

4 A Again, he was just sort of standing there, 15:22:51

5 you know. It was after he had given her a pretty 15:22:56

6 brisk -- yeah. 15:23:02

7 Q Just standing there. And you had mentioned 15:23:07

8 chewing gum? 15:23:10

9 A Yeah. He was just sort of standing 15:23:10

10 there -- 15:23:12

11 Q Okay. 15:23:13

12 A -- playing -- he looked like he was, you 15:23:14

13 know, playing tough guy. 15:23:17

14 Q But he didn't continue to speak directly to 15:23:18

15 you after that or direct anything to you? 15:23:22

16 A No. As I said, you know, that was not the 15:23:25

17 time or the place to continue or conduct any sort of 15:23:31

18 a discussion, argument, whatever. That was not the 15:23:39

19 time and the place to do that. 15:23:42

20 So the last I saw of Mr. Brooks when I 15:23:47

21 walked away from the -- from him was the -- you 15:23:53

22 know, he was standing there with the gum and kind of 15:23:58

23 just mumbling sort of, you know -- I don't think he 15:24:01

24 was particularly happy. 15:24:08

25 Q Was he mumbling anything that you could 15:24:09

JOHN DEPP, II - September 11, 2019  
BROOKS VS. DEPP

1 hear? Did you make anything out? 15:24:11

2 A No. It was just sort of like this kind of 15:24:14

3 mumbly complaint things, you know, or that kind 15:24:16

4 of -- "Who do you think you are?" kind of -- that 15:24:18

5 feeling. 15:24:20

6 But we had work to do, you know. 15:24:23

7 Q The entire interaction, how long do you 15:24:26

8 think it lasted? How many seconds? A minute? 15:24:30

9 Two minutes? 15:24:34

10 A I mean it was quick. It was -- it was 15:24:35

11 30 seconds, 40 -- 30 seconds. 15:24:41

12 Q Do you know, aside from the woman that you 15:24:46

13 mentioned -- do you happen to know her name? 15:24:48

14 A The elderly woman? 15:24:50

15 Q Yes. 15:24:53

16 A No. I didn't know. 15:24:53

17 Q Do you happen to know where we would be 15:24:55

18 able to get her name? Was she an extra? 15:24:57

19 A Yeah. I believe she was an -- yeah. I'm 15:25:00

20 sure she was an extra. And -- 15:25:02

21 Q Would the extras be paid? 15:25:05

22 A Sure. 15:25:08

23 Q They would be paid. 15:25:08

24 And was she an actor, an actress, or was 15:25:09

25 she -- 15:25:14





JOHN DEPP, II - September 11, 2019  
BROOKS VS. DEPP

1 turned -- it seemed like he almost, like, turned and 15:26:43  
2 walked into her or something, and it was, "Get out 15:26:47  
3 of my fucking way." You know, that kind of -- you 15:26:50  
4 know. 15:26:54

5 Q Had you noticed him stomping around the set 15:26:55  
6 at that time? 15:26:58

7 A He had made a couple of -- I guess he 15:27:00  
8 talked to Brad is what I understand. And then he 15:27:04  
9 was sort of stomping around here and there. 15:27:11

10 And then as I was sitting at the monitors 15:27:20  
11 with Emma, that's when I saw him, you know, have his 15:27:22  
12 sort of way with this poor woman. 15:27:35

13 Q Okay. It's your understanding now, as you 15:27:39  
14 sit here today, that he had had some words with Brad 15:27:42  
15 Furman before your interaction with him. But that 15:27:45  
16 day, you didn't know that he had had words with 15:27:50  
17 Mr. Furman; is that correct? 15:27:54

18 A No. I didn't until later. I was told, you 15:27:56  
19 know, that he was miffed about the time to stop or 15:28:01  
20 whatever. 15:28:10

21 I had been told by Brad that we had a 15:28:11  
22 midnight cutoff outside. And that's what we were 15:28:20  
23 trying to get done. 15:28:29

24 Q And who told you that he had had words with 15:28:30  
25 Mr. Furman prior to your interaction with him? 15:28:34

JOHN DEPP, II - September 11, 2019  
BROOKS VS. DEPP

1           A     No. I learned about the words with -- his           15:28:38  
2 words with Mr. Furman after.           15:28:43  
3           Q     Who told you? How did you learn?           15:28:44  
4           A     Brad.           15:28:46  
5           Q     Brad.           15:28:47  
6                    When?           15:28:48  
7           A     Basically, at wrap.           15:28:52  
8           Q     That evening?           15:28:54  
9           A     Uh-huh.           15:28:55  
10          Q     And how did that conversation take place?           15:28:56  
11          A     He -- you know, it was, like, one of           15:29:01  
12 those -- "Can you believe this fucking guy?" It was           15:29:08  
13 one of those, you know.           15:29:12  
14          Q     Okay. Mr. Furman approached you with that,           15:29:13  
15 or you approached Mr. Furman with that?           15:29:16  
16          A     Brad had told me of his talk with him, his           15:29:18  
17 confrontation with him. And I then -- because the           15:29:27  
18 most important thing to keep on a set -- because, if           15:29:39  
19 you let it get nuts, it will get nuts, you know.           15:29:45  
20 And if you let things drag out, they will drag out,           15:29:50  
21 and they'll just get worse and worse.           15:29:54  
22                    So after that conversation with Brad, I           15:29:57  
23 understood a little bit more with regard to           15:30:04  
24 Mr. Brooks's freak-out, and I decided that perhaps           15:30:09  
25 the guy -- again, he's under a lot of pressure. The           15:30:18

JOHN DEPP, II - September 11, 2019  
BROOKS VS. DEPP

1 location -- the clock's ticking. 15:30:23

2 So I thought to myself, "The guy is" -- 15:30:26

3 "look. He just got hot. He made a mistake. We 15:30:29

4 still have to finish this film. There's no reason 15:30:36

5 to drag this out. On set, disharmony takes away." 15:30:38

6 So I sent -- I think it was Jerry or Sean 15:30:49

7 to find Mr. Brooks so that I could go and have a 15:30:57

8 talk with him and clear the air and say that -- to 15:31:06

9 tell him that I understood he was under a lot of 15:31:14

10 pressure. Now I understood that he'd had a 15:31:18

11 discussion with the director that was, you know, not 15:31:21

12 to his liking. 15:31:24

13 And that's his arena. Locations is his 15:31:25

14 arena. So he's responsible. So I gave him the 15:31:30

15 benefit of the doubt, and I went up, and I found 15:31:35

16 him. 15:31:38

17 In fact, I brought -- I'd had my assistant 15:31:38

18 bring a bottle of wine. And we toasted in I think 15:31:42

19 paper cups. And, you know, no harm, no foul. I 15:31:52

20 apologized. He apologized. Gave him a hug. We 15:32:00

21 embraced. You know, I hugged him. And everything 15:32:12

22 was cool. 15:32:16

23 As a matter of fact, he asked for a selfie 15:32:18

24 with me. And so I took a selfie with him. And then 15:32:22

25 the last I heard of Mr. Brooks was what Sean -- I 15:32:34

JOHN DEPP, II - September 11, 2019  
BROOKS VS. DEPP

1 think it was Sean or Jerry. I think it was Sean -- 15:32:41  
2 saying, "That was cool you did that." Sean. "That 15:32:45  
3 was cool you did that. The guy came up to me 15:32:52  
4 afterwards, and he said, 'Hey, you know what? Your 15:32:56  
5 boss is' -- 'he's a solid guy. He's a solid guy.'" 15:32:59  
6 That was what Mr. Brooks told Sean Bett. 15:33:03  
7 Q And that was -- 15:33:12  
8 A And that was it. 15:33:13  
9 Q That was the last you had heard of 15:33:14  
10 Mr. Brooks or from Mr. Brooks? 15:33:16  
11 A Yes. 15:33:18  
12 Q Until when? 15:33:18  
13 A Until there was -- suddenly there was a 15:33:20  
14 case brought against me. 15:33:23  
15 Q We're skipping around a lot, but that's 15:33:28  
16 okay. 15:33:30  
17 Prior to a case being brought against you, 15:33:30  
18 there was an article written about this incident. 15:33:33  
19 Did anyone bring your attention to this article? 15:33:36  
20 A I don't recall. I have a built-in -- I 15:33:42  
21 don't read anything from the Internet or papers or 15:33:51  
22 any -- I don't know anything, you know. 15:33:57  
23 Q Okay. To the best of your memory here 15:34:10  
24 today, you don't know whether -- I think it was 15:34:13  
25 "Variety" ran an article about you punching -- 15:34:18

JOHN DEPP, II - September 11, 2019  
BROOKS VS. DEPP

1 on completing their exterior shots by 16:05:03  
2 the permitted time." 16:05:05  
3 Does this entry here at 10:45 -- 16:05:08  
4 I'm sorry -- 10:30 fall in line with your prior 16:05:11  
5 testimony that time was running short on getting 16:05:16  
6 these shots while the permits were still active? 16:05:18  
7 A I wasn't -- what I had been told with 16:05:23  
8 regard to permits was that we had a midnight -- I 16:05:28  
9 don't know whether it was an extension or whether we 16:05:36  
10 had the -- I was told that we had the rights to 16:05:38  
11 shoot outside until midnight. So at 10:30 and 16:05:43  
12 10:45, while we were effectively shooting that 16:05:51  
13 scene, of course there were other shots that night. 16:05:58  
14 Q You were shooting inside and outside the 16:06:08  
15 Barclay; correct? 16:06:11  
16 A Yes. 16:06:11  
17 Q And what was your understanding of when 16:06:11  
18 your permit to shoot inside the Barclay expired? 16:06:14  
19 A I don't remember the permit inside the 16:06:18  
20 Barclay. I just remember that I -- that we had -- 16:06:23  
21 as far as I was told, our permit for outside was -- 16:06:27  
22 the limit was midnight. 16:06:33  
23 Q Who told you that? 16:06:34  
24 A I believe it was Brad. I believe it was 16:06:35  
25 Brad Furman. 16:06:40

JOHN DEPP, II - September 11, 2019  
BROOKS VS. DEPP

1 Q Yeah. 16:15:54

2 A It came opened. They opened it at the 16:15:55

3 trailer and then brought it. 16:15:57

4 Q Who had opened that wine for you? 16:15:59

5 A It would have been my assistant at the 16:16:01

6 time. 16:16:02

7 Q Who was that? 16:16:02

8 A Nathan Holmes. 16:16:03

9 Q Is he still your assistant? 16:16:05

10 A No. He lives in Yorkshire. 16:16:06

11 Q Yorkshire. Good for him. He's escaped. 16:16:13

12 A Yeah. 16:16:15

13 Q Was it your custom to open wine and be sort 16:16:18

14 of merry at the end of filming? 16:16:23

15 A At wrap. 16:16:25

16 Q At wrap? 16:16:26

17 A Yeah. At wrap, it's -- you know, when 16:16:27

18 you've been through a hard day and you've got a lot 16:16:31

19 of what you believe to be meaningful -- you've 16:16:40

20 captured some meaningful things, yeah. There's 16:16:46

21 generally a -- you know, a glass or two of wine, 16:16:50

22 celebration kind of thing at the end of the day just 16:16:53

23 to wind down. 16:16:56

24 But that was brought intentionally. I 16:16:56

25 asked for it so that I could have a drink, you know. 16:17:03

JOHN DEPP, II - September 11, 2019  
BROOKS VS. DEPP

1 Q Symbolic? 16:17:09  
2 A Yeah. To toast one another and say, you 16:17:12  
3 know, "Understood. Everything's cool," you know. 16:17:15  
4 "Let's move forward." 16:17:18  
5 Q Was Mrs. Wallace still on the set when the 16:17:19  
6 wine was brought out and the toast happened and -- 16:17:23  
7 A No. 16:17:25  
8 Q -- you wrapped? 16:17:25  
9 A Ms. Wallace had left. 16:17:26  
10 Q And was she on the set when the altercation 16:17:29  
11 occurred between you and -- 16:17:31  
12 MR. SMITH: Objection -- 16:17:32  
13 MS. ARMINAK: -- Rocky? 16:17:32  
14 MR. SMITH: -- to the characterization, 16:17:33  
15 "altercation." 16:17:34  
16 MS. ARMINAK: It's a bad word; right? What 16:17:34  
17 would you say? 16:17:36  
18 MR. SMITH: Interaction. 16:17:36  
19 MS. ARMINAK: Interaction? 16:17:36  
20 MR. SMITH: Sure. 16:17:37  
21 THE WITNESS: At that point, I don't know 16:17:39  
22 if Mrs. Wallace -- if Voletta was still there. Mike 16:17:44  
23 was there when we were shooting outside. 16:17:49  
24 BY MS. ARMINAK: 16:17:57  
25 Q Had you had any Moscow mules that day? 16:17:59



JOHN DEPP, II - September 11, 2019  
BROOKS VS. DEPP

1 you say, the beginning of this year, 2019? 16:24:57

2 A He was already ill. So I believe it was in 16:25:01

3 2018 -- 16:25:10

4 Q '18? 16:25:11

5 A -- when he was no longer physically able to 16:25:12

6 make the -- you know, work in the way that he -- 16:25:16

7 Q Used to work? 16:25:22

8 A -- needed to, yeah. 16:25:23

9 Q Was Jerry a witness to the interaction with 16:25:25

10 Brooks that day? If you know. 16:25:31

11 A Yes. I'm sure he was, yes. He was on set 16:25:36

12 as was Sean. 16:25:39

13 Q And they were always near or around you; is 16:25:40

14 that correct? 16:25:43

15 A Generally, yeah. 16:25:43

16 Q Okay. It's my understanding that some 16:25:45

17 witnesses have stated that at some point one or two 16:25:51

18 of your bodyguards that day intervened in your 16:25:57

19 interaction with Mr. Brooks. 16:26:03

20 Does that make sense with your memory of 16:26:07

21 the incident? 16:26:11

22 MR. SMITH: Vague and ambiguous as to 16:26:13

23 "intervened." 16:26:14

24 THE WITNESS: That's sort of the word that 16:26:18

25 I don't quite get. I mean "intervention." 16:26:20

JOHN DEPP, II - September 11, 2019  
BROOKS VS. DEPP

1 BY MS. ARMINAK: 16:26:23

2 Q Okay. It's a dangerous word. All right. 16:26:24

3 Well, I can probably -- maybe it's 16:26:30

4 better if I -- 16:26:35

5 A I mean I can make it -- 16:26:35

6 Q You -- yeah -- 16:26:38

7 A -- easy just in a sense that, if something 16:26:40

8 were to -- in a situation like that, if I am 16:26:48

9 unfortunately in a position where I have to scold 16:26:57

10 someone for not behaving like a professional, I'm 16:27:01

11 sure they would have taken interest if I made a move 16:27:07

12 to stop him from what he was doing, which was being 16:27:13

13 rude to the woman. So -- 16:27:23

14 But there was no -- I mean, like, by 16:27:32

15 intervening, you know, that sort of thing, that 16:27:37

16 "connotates" someone was out of control or something 16:27:42

17 had to be -- that we had to be pulled apart. That's 16:27:45

18 not the case at all. 16:27:50

19 Q That's not the case? 16:27:51

20 A No. 16:27:52

21 Q Would it surprise you that one witness 16:27:52

22 states that your longtime bodyguard Jerry Judge had 16:27:54

23 to pull you away? Had to physically pull you away 16:28:02

24 from Mr. Brooks? 16:28:10

25 A If Jerry -- if Jerry physically pulled me 16:28:11

JOHN DEPP, II - September 11, 2019  
BROOKS VS. DEPP

1 Q You've never had occasion to speak with 16:34:18  
2 Mr. Furman about that detail? 16:34:20  
3 A No. 16:34:21  
4 Q Has anyone told you whether or not 16:34:22  
5 Mr. Furman affirmatively said to Mr. Brooks, "You go 16:34:29  
6 tell Johnny, then"? 16:34:36  
7 A No one's said that -- confirmed that to me, 16:34:38  
8 no. I mean -- and I certainly didn't hear it. 16:34:42  
9 Q Some witness statements say that you were 16:34:44  
10 directing that particular scene. 16:34:50  
11 A No. 16:34:53  
12 Q And that Mr. Furman was taking a back seat. 16:34:54  
13 Is that true? 16:35:00  
14 A No. 16:35:02  
15 Q Did you -- 16:35:04  
16 A I've never, ever taken power away from a 16:35:07  
17 director or -- especially on an active set. To 16:35:10  
18 "chidle" the director aside and sit him down and 16:35:22  
19 say, you know, "I'm going to take care of this now" 16:35:26  
20 in front of the entire crew would be very bad form, 16:35:29  
21 you know. 16:35:35  
22 Q Right. 16:35:35  
23 A That would be a very -- it's almost like a 16:35:36  
24 hostile takeover. It would be embarrassing for the 16:35:44  
25 filmmaker, and I would never do that. 16:35:47

JOHN DEPP, II - September 11, 2019  
BROOKS VS. DEPP

1           Again, it's a collaborative effort. If I 16:35:51  
2   made suggestions -- if I made suggestions of the 16:35:54  
3   effect of the actor's -- let's say the actor's 16:35:57  
4   reaction to being arrested -- 16:36:04  
5           I do remember making the suggestion -- 16:36:10  
6   because I thought it was very important to see this 16:36:12  
7   black man who was doing nothing whatsoever and he 16:36:21  
8   gets his regular hassle from cops on a street. And 16:36:30  
9   what I wanted to see was, instead of seeing this man 16:36:35  
10  fight against the police, what I suggested was that, 16:36:41  
11  when they put him -- when they throw him against the 16:36:48  
12  wall and they put him in handcuffs, that he 16:36:52  
13  remain -- that it's not -- it's not new. It's 16:36:57  
14  nothing new -- that he remain dignified and 16:37:01  
15  maintained his cool and his integrity and just took 16:37:11  
16  it like a man. Though it was a grave injustice, it 16:37:13  
17  is something that a lot of people are used to down 16:37:25  
18  in those areas. 16:37:28  
19           Those were the suggestions that I made. 16:37:29  
20       Q    Okay. But Mr. Furman was directing that 16:37:32  
21  scene? 16:37:37  
22       A    Yes. 16:37:37  
23       Q    Okay. And you were not in that particular 16:37:38  
24  scene; correct? 16:37:41  
25       A    No. 16:37:42

JOHN DEPP, II - September 11, 2019  
BROOKS VS. DEPP

1 Q But Killer Mike was in that scene; correct? 16:37:45  
2 A Yes. 16:37:51  
3 Q And had come from Atlanta? 16:37:51  
4 A Yes. 16:37:53  
5 Q He's a friend of yours? 16:37:54  
6 A Yes. 16:37:55  
7 Q He had done you this favor to come and film 16:37:55  
8 this scene? 16:37:57  
9 A Yes. 16:37:58  
10 Q Was it only this scene that he was in? 16:37:59  
11 A Yeah. 16:38:01  
12 Q Do you know if this scene ended up in the 16:38:01  
13 actual last version of the movie? 16:38:04  
14 A I asked about it, and it -- Brad knew that 16:38:07  
15 it was an important cameo, and I'm sure it did. 16:38:12  
16 Q Good. 16:38:16  
17 Did Brad want to shoot this scene? 16:38:19  
18 MR. SMITH: Calls for speculation. 16:38:24  
19 MS. ARMINAK: That's right. 16:38:26  
20 Q Let me -- let me help on this. 16:38:27  
21 A You mean did he want to shoot the scene? 16:38:30  
22 He shot the scene. 16:38:34  
23 Q He shot the scene. Yeah. 16:38:35  
24 But we know now that everything was over, 16:38:36  
25 over, over, just like it's always over, over, over. 16:38:39

JOHN DEPP, II - September 11, 2019  
BROOKS VS. DEPP

1 A Uh-huh. 16:38:41

2 Q And you mentioned how you start tearing out 16:38:41

3 pages of script. 16:38:44

4 A That's if the completion bond comes in. 16:38:45

5 Q That's -- right. 16:38:47

6 Was this a scene that you and Brad 16:38:49

7 disagreed on in terms of whether or not it was 16:38:57

8 important to shoot that night? 16:38:58

9 A No. 16:39:01

10 Q Okay. 16:39:04

11 A No. Once he knew that Killer Mike was 16:39:05

12 coming in after no notice and he just got on a plane 16:39:09

13 after he and his wife -- I'd informed him that 16:39:14

14 Killer Mike had said yes and he would be flying in. 16:39:21

15 He would be in the afternoon. But it was fine 16:39:25

16 because his scenes weren't until later that night. 16:39:27

17 Q There's some witness discussion about 16:39:33

18 Mr. Furman not wanting to shoot this scene but it 16:39:37

19 being important to you specifically and him sort of 16:39:39

20 having to go along with it and sort of the reason 16:39:42

21 why he begrudgingly tells Mr. Brooks, "Well, then 16:39:47

22 you go tell Johnny he needs to wrap up." 16:39:51

23 So my question to you is: Is that the 16:39:55

24 sense that you felt that day while you were on the 16:39:57

25 set watching this scene be shot? 16:40:01

JOHN DEPP, II - September 11, 2019  
BROOKS VS. DEPP

1 way, it was Mr. Brooks. 16:44:57

2 Q Okay. When you say you "got in his 16:44:58

3 proximity" -- a stereotype is girls don't know 16:45:02

4 anything about measurements. 16:45:13

5 But you and I are seated here at this 16:45:14

6 table. I don't know. What do you think? Is it 16:45:17

7 3 feet? We're 3 feet apart? 16:45:17

8 A Between us? 16:45:19

9 Q Between us. 16:45:20

10 A Oh, between us? Yeah. 16:45:20

11 Q I put my hand out; I can't reach you. 16:45:20

12 3 feet apart. 16:45:23

13 Do you think you and Mr. Brooks were 3 feet 16:45:25

14 apart or maybe a little closer? 16:45:27

15 A It was closer. 16:45:28

16 Q Closer than 3 feet apart? 16:45:29

17 A Uh-huh. 16:45:31

18 Q You think this is a foot in right here 16:45:31

19 where I -- so if you're looking at this and that's 16:45:34

20 2 feet apart, would you say you're about 2 feet 16:45:36

21 apart? 16:45:39

22 A About 2 feet. Something like that. It 16:45:39

23 was -- again, you know, on a film set, you -- 16:45:44

24 Q Yeah. It's tight; right? 16:45:47

25 A It's tight, but you also don't -- you don't 16:45:48

JOHN DEPP, II - September 11, 2019  
BROOKS VS. DEPP

1 just break into a yell. Things need to be dealt 16:45:52  
2 with in a very discreet way. So it's, as I said 16:45:57  
3 before, no screaming, no nothing. It was -- it was 16:46:04  
4 me talking to the guy, telling him that his behavior 16:46:09  
5 was unacceptable and that we're not going to -- 16:46:15  
6 things ain't going to work this way, you know. 16:46:21

7 In fact, at that point, it was -- you know, 16:46:24  
8 I was a little surprised that this location manager, 16:46:29  
9 who, I guess, you know, was having his moment of 16:46:34  
10 freak-out, that -- I was a little surprised that he 16:46:40  
11 was so interested in taking time -- so much time off 16:46:51  
12 the set if he wanted us to complete the shoot. He 16:46:54  
13 seemed to be wasting a lot more time. 16:47:03

14 Q Do you feel that he yelled at you at any 16:47:04  
15 point during your interaction? 16:47:08

16 A No. I don't believe he yelled at me, but 16:47:15  
17 he was heated. And it was, you know, all the stuff 16:47:18  
18 we talked about earlier. 16:47:26

19 Q But no part of your body made physical 16:47:27  
20 contact with his body. 16:47:30

21 Am I correct? 16:47:31

22 A Absolutely not -- no contact whatsoever. 16:47:32  
23 There are dozens and dozens -- I mean there are 40, 16:47:42  
24 50, 60, 70 people around, and we're on the street. 16:47:45  
25 You know, we're filming it on the street. 16:47:54





JOHN DEPP, II - September 11, 2019  
BROOKS VS. DEPP

1 films. Maybe three. But it's -- you work with so 17:23:03  
2 many different people, and you know these people, 17:23:09  
3 but it's hard to remember exactly what film you've 17:23:11  
4 done together. Sometimes you look at each other and 17:23:17  
5 go, "Why do we know each other?" 17:23:19  
6 And they go, "We did 'Gilbert Grape.'" 17:23:21  
7 And you go, "Oh, yeah. Okay. Yes." 17:23:23  
8 Q That was some time ago. 17:23:23  
9 A Yeah. But I don't know that Emma did 17:23:24  
10 "Gilbert Grape." I'm just saying. 17:23:28  
11 Q We had a joke earlier, and I said you 17:23:30  
12 probably wouldn't be able to pick Mr. Brooks out of 17:23:33  
13 a lineup. 17:23:36  
14 A Yes. 17:23:37  
15 Q Would you be able to pick Ms. Danoff out of 17:23:37  
16 a lineup? 17:23:39  
17 A Yes. 17:23:40  
18 Q If she walked in the room, you would know 17:23:40  
19 it's Emma Danoff? 17:23:43  
20 A Yes. 17:23:44  
21 Q Do you have a friendly relationship with 17:23:45  
22 her? 17:23:46  
23 A We get along great, sure. 17:23:47  
24 Q Okay. Have you socialized outside of her 17:23:49  
25 being a script supervisor? 17:23:53

JOHN DEPP, II - September 11, 2019  
BROOKS VS. DEPP

1 A No. 17:23:55

2 Q No. 17:23:57

3 Was she the script supervisor for the 17:23:58

4 entirety of "City of Lies"? 17:24:00

5 A Yes. I believe so, yes. I'm -- yes. 17:24:04

6 Q And do you yourself or through your 17:24:07

7 production company hire her directly? 17:24:10

8 A No. 17:24:13

9 Q I'm wondering how she landed on three of 17:24:14

10 your films. 17:24:17

11 Do you have any idea how she was -- and I'm 17:24:19

12 assuming -- was she the script supervisor on the 17:24:23

13 other films? 17:24:25

14 A Yes. 17:24:26

15 Q Yes. 17:24:26

16 That's what she does by trade? 17:24:26

17 A Yeah. 17:24:28

18 Q That's her job. 17:24:28

19 Do you know how she ended up being the 17:24:29

20 script supervisor on three of your films? 17:24:33

21 A She was unlucky, I suppose. She was 17:24:35

22 unlucky she had to deal with me three times. 17:24:41

23 I don't. 17:24:44

24 Q Did you request her? 17:24:45

25 A No. I didn't. But I certainly would have 17:24:50

JOHN DEPP, II - September 11, 2019  
BROOKS VS. DEPP

1 requested her or given her the highest marks. She's 17:24:52  
2 an astonishing -- script supervisor's one of the 17:25:00  
3 most difficult jobs on set. You have to keep track 17:25:06  
4 of everything, and she's very, very good. So I 17:25:08  
5 would have, of course, recommended her for any job. 17:25:13

6 Q Did you work with her on a daily basis 17:25:16  
7 during "City of Lies"? 17:25:18

8 A Oh, yeah. Of course. 17:25:19

9 Q And what were some of the interactions that 17:25:22  
10 you would have with her throughout the day as you're 17:25:23  
11 filming? 17:25:29

12 A Generally a script supervisor will make 17:25:30  
13 sure that -- for example, if you've shot what's 17:25:38  
14 called a master shot, the wide shot, once you've 17:25:41  
15 established the master, if I say a line and I pick 17:25:45  
16 my drink up and say the line, take a sip, put it 17:25:51  
17 back down, then say the rest of the line, you 17:25:55  
18 want -- what you want -- when they get to close-ups 17:26:03  
19 or closer shots, you have to match those actions. 17:26:07

20 So she -- Emma's always the one who matches 17:26:10  
21 your -- she will make sure that you're matching your 17:26:15  
22 actions from the master so that, any movement from 17:26:17  
23 the master, they can cut to the close-up with the 17:26:21  
24 glass lifting, if you know what I mean. 17:26:24

25 So she keeps -- our interactions would be, 17:26:26

JOHN DEPP, II - September 11, 2019  
BROOKS VS. DEPP

1 that up if you wanted to look up that information? 17:28:47

2 A I would probably go to IMDb. 17:28:50

3 Q Just like anyone else; right? 17:28:54

4 A Yeah. Just look up crew. 17:28:56

5 Q Okay. You think you've worked with her 17:29:01

6 more than once in the last five years? 17:29:08

7 A I can't say that it's once in the last 17:29:15

8 five years. But it would definitely -- must be 17:29:17

9 once -- at least once or twice in the last 17:29:20

10 ten years, I guess. 17:29:22

11 Q All right. And do you have -- did you 17:29:29

12 request her specifically for "City of Lies" or any 17:29:31

13 other movie you've worked with her on? 17:29:34

14 A No. 17:29:37

15 Q And do you intend on requesting her 17:29:39

16 specifically for any other movies you have getting 17:29:42

17 ready to shoot? 17:29:46

18 A No. There's been no plan of that, no. 17:29:49

19 Q Okay. Speaking of which, the trial in this 17:29:51

20 case is October, and you are currently a civilian? 17:29:56

21 Are you -- 17:30:02

22 A I am a civilian. 17:30:03

23 Q Are you currently -- you're a civilian. 17:30:04

24 You are shooting your next film when, sir? 17:30:07

25 A As far as I know, the next film that I'll 17:30:13

JOHN DEPP, II - September 11, 2019  
BROOKS VS. DEPP

1           But these -- from what I -- I see a little           17:39:36  
2 bit of silver on his shoulder. He looks to me like           17:39:40  
3 a police extra.           17:39:44  
4           Q       Great.           17:39:49  
5           This -- I'll represent to you that           17:39:50  
6 Ms. Danoff states that this photograph was taken           17:39:55  
7 almost directly after your discussion with           17:39:58  
8 Mr. Brooks.           17:40:02  
9           A       Uh-huh. Yes.           17:40:03  
10          Q       Does that seem correct to you?           17:40:05  
11          MR. SMITH: Objection. Calls for           17:40:09  
12 speculation. And vague and ambiguous.           17:40:11  
13 BY MS. ARMINAK:           17:40:11  
14          Q       Do you know? Do you know if this           17:40:12  
15 photograph is directly after your confrontation with           17:40:13  
16 Mr. Brooks?           17:40:18  
17          A       I don't know if it was directly after the           17:40:19  
18 confrontation. But I'd -- after we'd had our           17:40:22  
19 discussion and I made my way back to set, back to           17:40:30  
20 work, this is -- this is where I went.           17:40:36  
21          Q       How far did you have to walk back to where           17:40:42  
22 you are here in this photograph from where you had           17:40:46  
23 your interaction with Mr. Brooks?           17:40:48  
24          A       Oh, I think it was 10 feet, maybe.           17:40:52  
25          12 feet.           17:40:58



JOHN DEPP, II - September 11, 2019  
BROOKS VS. DEPP

1           Here, you're wearing what looks to be a           17:47:01  
2   jacket --           17:47:04  
3       A     It's a green --           17:47:05  
4       Q     -- green plaid jacket?           17:47:06  
5       A     -- plaid shirt.           17:47:09  
6       Q     Plaid shirt. Okay.           17:47:09  
7           This was not part of your wardrobe?           17:47:11  
8       A     No.           17:47:14  
9       Q     So you now -- this has refreshed your           17:47:14  
10   recollection, and I'm correct when I say that you           17:47:21  
11   were done shooting yourself that night? You were           17:47:23  
12   not shooting any more scenes?           17:47:26  
13       A     I apparently was not because it would have           17:47:28  
14   been strange to get out of wardrobe to go back and           17:47:31  
15   get in wardrobe unless there were a change. But I           17:47:35  
16   think at 11:00 -- this is 11:11 right here. It           17:47:39  
17   looks to me like they'd given up shooting any --           17:47:45  
18   whatever shots they had left on the inside.           17:47:52  
19       Q     Okay. We know just from --           17:47:55  
20       A     Sorry. I've stolen your pen.           17:47:58  
21       Q     No. Not at all.           17:48:00  
22           And I'm going to ask you to -- I know you           17:48:00  
23   placed an X, but on the record, can you also do the           17:48:02  
24   same thing --           17:48:06  
25       A     Oh, sure.           17:48:07



JOHN DEPP, II - September 11, 2019  
BROOKS VS. DEPP

1 Q Yeah. That would be great. 17:48:08

2 -- marking where your interaction with 17:48:08

3 Mr. Brooks, approximately, took place. 17:48:10

4 Would it be unusual for you just to take 17:48:11

5 off your trench coat, you know, for continuity 17:48:15

6 purposes, not get it dirty or wrinkled or whatnot? 17:48:18

7 Take it off for a short amount of time while others 17:48:22

8 were shooting scenes, put on this jacket or this 17:48:24

9 shirt so you wouldn't get cold because it is 17:48:30

10 11:00 o'clock at night in Downtown LA in April and 17:48:34

11 then, later when it's your turn again to shoot, put 17:48:36

12 on that trench coat? 17:48:39

13 A I mean that could happen in a film. It 17:48:43

14 could certainly happen. But -- 17:48:47

15 Q It's happened before? 17:48:48

16 A I know that on this film -- because there 17:48:50

17 was a little more than just wardrobe to deal with. 17:48:54

18 I was wearing a padded suit, a fat suit, so that I 17:48:58

19 had a big beer gut sort of belly and sort of flabby 17:49:05

20 looking. 17:49:14

21 So I wore a fat suit under a lot of my 17:49:16

22 wardrobe. And when I -- also, when I wear the 17:49:20

23 trench coat, it's an earlier -- it's an earlier time 17:49:29

24 for the character in the piece. 17:49:36

25 Q It's daytime; correct? 17:49:38

JOHN DEPP, II - September 11, 2019  
BROOKS VS. DEPP

1           A     Well, he was -- he was still a police           17:49:39  
2     officer then. It was prior to him leaving the           17:49:43  
3     force. So whenever I see the trench coat, I know           17:49:48  
4     that that's earlier in the scenes, which wouldn't       17:49:51  
5     have any relevance to these scenes whatsoever           17:49:55  
6     because, here, my character had already left the       17:50:00  
7     force and he'd gotten older and chunkier and all       17:50:05  
8     that stuff.   17:50:11  
9                So there was -- so I know for sure that       17:50:12  
10    this is -- I'm totally out of wardrobe here. In       17:50:14  
11    fact, my hair isn't even sort of coifed in that       17:50:19  
12    weird way that the character's was at that time.       17:50:25

13           Q     I was going to ask you. Were there changes   17:50:28  
14    to your hair?   17:50:30

15           A     Uh-huh.   17:50:30

16           Q     Were you wearing some sort of wig or had       17:50:31  
17    some coloring in your hair --                               17:50:35

18           A     Yes.   17:50:36

19           Q     -- to make you look older --                   17:50:36

20           A     Yes.   17:50:38

21           Q     -- during the hotel scenes, the scenes       17:50:38  
22    where your character is inside the Barclay Hotel?       17:50:42

23           A     Yes. Yes.   17:50:44

24           Q     Okay. So, essentially, the scenes where       17:50:45  
25    your character's inside the Barclay Hotel are when       17:50:48

JOHN DEPP, II - September 11, 2019  
BROOKS VS. DEPP

1 your character is older in time? 17:50:51

2 A Exactly. And they're mostly scenes with 17:50:52

3 Forest Whitaker that took place in what was Russell 17:50:58

4 Poole's rundown apartment. 17:51:02

5 Q Okay. Okay. Were there any scenes inside 17:51:05

6 the Barclay Hotel that were shot that didn't include 17:51:15

7 you? 17:51:18

8 A I don't know. 17:51:20

9 Q Okay. I'm only asking because I know that 17:51:20

10 the shoot continued into the Barclay Hotel that 17:51:24

11 evening, just from reading -- I guess I'm calling 17:51:26

12 them the dailies. But now I understand that you 17:51:30

13 were not part of those shoots. 17:51:32

14 A I don't see how I could have been, no. 17:51:35

15 Q Okay. 17:51:38

16 A I don't see how I could have been since I'm 17:51:39

17 well out of -- 17:51:41

18 Q Yeah. 17:51:43

19 A -- costume and what looks like hair. 17:51:44

20 Q And it would have taken you a significant 17:51:48

21 amount of time to get back into costume; right? 17:51:50

22 Okay. Correct? 17:51:52

23 A Then I'd have to go -- 17:51:53

24 Q Yes. 17:51:55

25 A And if you're really running for time, I 17:51:56

JOHN DEPP, II - September 11, 2019  
BROOKS VS. DEPP

1 would have -- I would have still been in the 17:52:02  
2 wardrobe. I would have still been in the fat suit 17:52:07  
3 or whatever it was. 17:52:10

4 Q This is now going into evening. The shots 17:52:12  
5 earlier that I had shown you with your father and 17:52:15  
6 them look like there was a little bit of daylight 17:52:17  
7 left. 17:52:22

8 Do you know if your father and his wife 17:52:22  
9 were present during the evening hours of this day? 17:52:24  
10 Were they on set? 17:52:28

11 A I don't remember if they stayed the whole 17:52:32  
12 day. I know they were -- I'd forgotten that they 17:52:34  
13 were there completely, but there's no mistaking -- I 17:52:38  
14 see my father's back and his arms. Certainly him. 17:52:42

15 But that was the day that we'd had quite an 17:52:49  
16 intense and very long scene with Christopher 17:52:55  
17 Wallace -- Biggie Smalls's mother, Voletta. 17:53:02  
18 Ms. Wallace was -- we did a scene in a diner with 17:53:07  
19 Ms. Wallace, myself, and Forest. We'd done that for 17:53:11  
20 a couple of hours that day. We'd shot -- 17:53:17

21 Q Who was she playing? Herself? 17:53:20  
22 A She's playing herself, yeah. 17:53:22  
23 Q Wow. 17:53:24  
24 A Yeah. She was -- she was quite special. 17:53:25  
25 Q Yes. I agree. 17:53:31

JOHN DEPP, II - September 11, 2019  
BROOKS VS. DEPP

1 MS. ARMINAK: All right. What I would like 17:59:18  
2 to do now is take a quick break if we can. Let me 17:59:20  
3 see how much more I have and try and wrap this up. 17:59:22  
4 THE WITNESS: Is this yours? 17:59:22  
5 MS. ARMINAK: Although -- 17:59:28  
6 THE WITNESS: This is yours; right? 17:59:28  
7 BY MS. ARMINAK: 17:59:28  
8 Q These are going to be originals, sir, 17:59:29  
9 because you've marked them. And the court reporter 17:59:32  
10 is going to take custody of them right now. 17:59:34  
11 A Approximate area of -- okay. 17:59:39  
12 Everything or the whole -- 17:59:57  
13 MS. ARMINAK: Yes. The whole stack, sir. 17:59:58  
14 THE VIDEOGRAPHER: Off the record. The 18:00:04  
15 time is 6:00 p.m. 18:00:06  
16 (Recess.) 18:24:47  
17 THE VIDEOGRAPHER: We are back on the 18:24:47  
18 record. The time is 6:24. 18:24:49  
19 BY MS. ARMINAK: 18:24:51  
20 Q Okay, just a few wrap-up questions, 18:24:52  
21 Mr. Depp. 18:24:54  
22 A Sure. 18:24:57  
23 Q Thank you for indulging me, humoring me. 18:24:57  
24 A Not at all. Thank you. 18:24:58  
25 Q I want to know whether or not you're aware 18:25:01

JOHN DEPP, II - September 11, 2019  
BROOKS VS. DEPP

1 of a declaration by Ms. Danoff that was provided in 18:25:04  
2 this case. 18:25:09  
3 A Yes. 18:25:10  
4 Q Have you read that declaration? 18:25:10  
5 A Yes. 18:25:12  
6 Q When did you last read it? 18:25:13  
7 A Yesterday, I believe. 18:25:18  
8 Q Okay. 18:25:19  
9 A Or this morning. 18:25:19  
10 Q Okay. 18:25:21  
11 A Or yesterday. 18:25:21  
12 Q Either yesterday or today, you read it in 18:25:23  
13 preparation for the deposition today? 18:25:26  
14 A Uh-huh. 18:25:27  
15 Q Is that right? 18:25:27  
16 A Yes. 18:25:28  
17 Q Yes. 18:25:28  
18 A Excuse me. 18:25:29  
19 Q It's okay. 18:25:29  
20 And prior to reading it, either last night 18:25:30  
21 or this morning, when did you first read the 18:25:35  
22 declaration? 18:25:39  
23 A That was the first time. 18:25:40  
24 Q When was the first time you had heard that 18:25:42  
25 Ms. Danoff had written a declaration in your favor 18:25:44

JOHN DEPP, II - September 11, 2019  
BROOKS VS. DEPP

1           A     Yes. '97, '98. 18:36:41

2                     And what -- Marlon used to wear an 18:36:44

3     earpiece, and his secretary -- because, if he had, 18:36:49

4     like, five pages of dialogue, he -- Marlon loved the 18:36:53

5     idea that he could get the dialogue from her in his 18:36:59

6     ear, and it would almost be like, you know, him 18:37:02

7     hearing it in his head for the first time. 18:37:09

8                     So he used it as a kind -- it was a 18:37:11

9     freshness to the work for him. And when I was 18:37:13

10    working with him -- because he'd run out of, you 18:37:17

11    know, gas around 8:00 p.m. -- I would shoot all of 18:37:20

12    Marlon's close-up first, and then I would watch a 18:37:25

13    monitor that had Marlon's takes on it. 18:37:30

14                     I'd let him go home, and then I'd put his 18:37:32

15    ear monitor in so that I could hear his dialogue but 18:37:36

16    the crew couldn't, which meant we could overlap. 18:37:42

17           Q     Understood. 18:37:42

18           A     So that was how I first learned about the 18:37:50

19    ear thing and just thought -- immediately, I 18:37:52

20    thought, "Well, this is perfect for music." 18:37:56

21           Q     Right. 18:37:59

22                     Now, Mr. Brando used it for words. Keenan 18:38:02

23    doesn't read the dialogue to you through your 18:38:11

24    earpiece, does he? 18:38:14

25           A     No. I mean there have been times in the 18:38:15

JOHN DEPP, II - September 11, 2019  
BROOKS VS. DEPP

1 past if you get -- if somebody chucks a scene in and 18:38:20  
2 you say, "Well, I'm not really prepared for this 18:38:26  
3 scene. We weren't supposed to shoot this yet." But 18:38:29  
4 it's got to be done. 18:38:33  
5 Q Right. 18:38:35  
6 A It would be impossible to learn the two or 18:38:38  
7 three pages of dialogue or more. 18:38:41  
8 So under those kind of circumstances, it's 18:38:43  
9 a good friend if you need to get something done that 18:38:51  
10 you're not fully prepared for. 18:38:54  
11 So in the past, yeah, I've used that method 18:38:56  
12 a couple of times. But it's not my favorite. 18:38:59  
13 Q Of course. Understood. 18:39:07  
14 Now, the microphone that you have on where 18:39:09  
15 Keenan can hear you and presumably anyone with a 18:39:14  
16 headphone on the same frequency can hear you, 18:39:17  
17 whether or not, you know -- were you -- is that mic 18:39:20  
18 always hot? 18:39:25  
19 A No. 18:39:26  
20 Q When -- strike that. 18:39:29  
21 Do you have control as to whether or not 18:39:31  
22 that mic is hot? 18:39:34  
23 A I can make it unhot, certainly. 18:39:37  
24 Q Tell me how you would. 18:39:40  
25 A Unplug it. 18:39:42



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WITNESS'S CERTIFICATE

I am the witness in the foregoing deposition. I have read the foregoing deposition and having made such changes and corrections as I desire, I certify that the same is true of my own knowledge, except as to those matters which are therein stated upon my information or belief, and as to those matters, I believe it to be true.

I declare under penalty of perjury under the laws of the state of California that the foregoing is true and correct.

Executed on \_\_\_\_\_,  
at \_\_\_\_\_.

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JOHN C. DEPP, II

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REPORTER'S CERTIFICATE

I, JEAN KIM, CSR No. 13555, RPR, a certified shorthand reporter in and for the state of California, do hereby certify:

That prior to being examined the witness named in the foregoing proceedings was by me duly sworn to testify to the truth, the whole truth, and nothing but the truth;

That said proceedings were taken by me in shorthand at the time and place herein named and was thereafter transcribed into typewriting under my direction, said transcript being a true and correct transcription of my shorthand notes.

I further certify that I have no interest in the outcome of this action.

September 27, 2019



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JEAN KIM  
CSR NO. 13555, RPR