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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 GREGG "ROCKY"  
BROOKS**

**VOLUME ONE:**

PAGE 11, LINE 7 - PAGE 11, LINE 24

OBJECTION: RELEVANCE

PAGE 12, LINE 24 - PAGE 13, LINE 15

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

PAGE 23, LINE 7 - PAGE 24, LINE 9

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

PAGE 25, LINE 8 - PAGE 25, LINE 13      OBJECTION: CALLS FOR SPECULATION  
PAGE 31, LINE 13 - PAGE 31, LINE 21      OBJECTION: \_\_\_\_\_  
PAGE 32, LINE 24 - PAGE 33, LINE 17      OBJECTION: \_\_\_\_\_  
PAGE 36, LINE 1 - PAGE 36, LINE 5      OBJECTION: \_\_\_\_\_  
PAGE 38, LINE 16 - PAGE 38, LINE 20      OBJECTION: \_\_\_\_\_  
PAGE 39, LINE 10 - PAGE 39, LINE 22      OBJECTION: \_\_\_\_\_  
PAGE 58, LINE 4 - PAGE 58, LINE 13      OBJECTION: RELEVANCE  
PAGE 59, LINE 7 - PAGE 59, LINE 18      OBJECTION: \_\_\_\_\_  
PAGE 59, LINE 21 - PAGE 60, LINE 21      OBJECTION: \_\_\_\_\_  
PAGE 61, LINE 10 - PAGE 62, LINE 19      OBJECTION: \_\_\_\_\_  
PAGE 63, LINE 13 - PAGE 64, LINE 18      OBJECTION: \_\_\_\_\_

**COUNTER-DESIGNATION:**

PAGE 7, LINE 18 - PAGE 8, LINE 1      OBJECTION: RELEVANCE  
PAGE 34, LINE 1- PAGE 34, LINE 13      OBJECTION: RELEVANCE  
PAGE 34, LINE 23 - PAGE 35, LINE 25      OBJECTION: RELEVANCE  
PAGE 38, LINE 21 - PAGE 39, LINE 9      OBJECTION: RELEVANCE  
PAGE 58, LINE 14 - PAGE 59, LINE 6      OBJECTION: RELEVANCE; HEARSAY  
PAGE 61, LINE 1 - PAGE 61, LINE 7      OBJECTION: \_\_\_\_\_  
PAGE 62, LINE 20 - PAGE 63, LINE 12      OBJECTION: \_\_\_\_\_

**DEPOSITION OF GREGG "ROCKY"  
BROOKS**

**VOLUME TWO:**

PAGE 78, LINE 18 - PAGE 79, LINE 1      OBJECTION: \_\_\_\_\_  
PAGE 86, LINE 15 - PAGE 86, LINE 25      OBJECTION: CALLS FOR SPECULATION

PAGE 87, LINE 22 - PAGE 88, LINE 14	OBJECTION: CALLS FOR SPECULATION
PAGE 91, LINE 16 - PAGE 92, LINE 4	OBJECTION: _____
PAGE 92, LINE 12 - PAGE 93, LINE 1	OBJECTION: _____
PAGE 93, LINE 17 - PAGE 93, LINE 24	OBJECTION: _____
PAGE 99, LINE 9 - PAGE 99, LINE 15	OBJECTION: LACKS FOUNDATION
PAGE 100, LINE 4 - PAGE 100, LINE 8	OBJECTION: CALLS FOR SPECULATION
PAGE 100, LINE 25 - PAGE 101, LINE 3	OBJECTION: CALLS FOR SPECULATION
PAGE 102, LINE 9 - PAGE 102, LINE 25	OBJECTION: _____
PAGE 104, LINE 2 - PAGE 104, LINE 6	OBJECTION: ASKED AND ANSWERED
PAGE 111, LINE 14 - PAGE 111, LINE 16	OBJECTION: _____
PAGE 114, LINE 3 - PAGE 114, LINE 11	OBJECTION: HEARSAY, ASKED AND ANSWERED
PAGE 119, LINE 16 - PAGE 119, LINE 25	OBJECTION: _____
PAGE 120, LINE 3 - PAGE 120, LINE 14	OBJECTION: _____
PAGE 120, LINE 15 - PAGE 120, LINE 20	OBJECTION: _____
PAGE 122, LINE 19 - PAGE 122, LINE 24	OBJECTION: _____
PAGE 123, LINE 5 - PAGE 123, LINE 16	OBJECTION: _____
PAGE 124, LINE 10 -PAGE 124, LINE 24	OBJECTION: _____
PAGE 126, LINE 12 - PAGE 126, LINE 22	OBJECTION: _____
PAGE 126, LINE 23 - PAGE 127, LINE 1	OBJECTION: _____
PAGE 128, LINE 9 - PAGE 128, LINE 24	OBJECTION: _____
PAGE 130, LINE 3 - PAGE 132, LINE 7	OBJECTION: _____
PAGE 133, LINE 17 - PAGE 135, LINE 9	OBJECTION: _____
PAGE 135, LINE 21 - PAGE 136, LINE 14	OBJECTION: _____
PAGE 138, LINE 2 - PAGE 138, LINE 12	OBJECTION: _____
PAGE 138, LINE 16 - PAGE 139, LINE 9	OBJECTION: _____

PAGE 139, LINE 24 - PAGE 140, LINE 16	OBJECTION: RELEVANCE, ASKED AND ANSWERED
PAGE 142, LINE 1 - PAGE 143, LINE 2	OBJECTION: RELEVANCE, ASKED AND ANSWERED
PAGE 144, LINE 8 - PAGE 144, LINE 24	OBJECTION: RELEVANCE
PAGE 145, LINE 12 - PAGE 145, LINE 16	OBJECTION: RELEVANCE
PAGE 146, LINE 10 - PAGE 146, LINE 17	OBJECTION: _____
PAGE 146, LINE 24 - PAGE 147, LINE 4	OBJECTION: _____
PAGE 152, LINE 20 - PAGE 153, LINE 21	OBJECTION: RELEVANCE
PAGE 154, LINE 24 - PAGE 155, LINE 24	OBJECTION: RELEVANCE
PAGE 157, LINE 5 - PAGE 157, LINE 17	OBJECTION: RELEVANCE
PAGE 159, LINE 7 - PAGE 159, LINE 15	OBJECTION: RELEVANCE
PAGE 160, LINE 23 - PAGE 161, LINE 22	OBJECTION: _____
PAGE 162, LINE 16 - PAGE 162, LINE 19	OBJECTION: _____
PAGE 170, LINE 13 - PAGE 170, LINE 18	OBJECTION: _____
PAGE 172, LINE 2 - PAGE 172, LINE 6	OBJECTION: _____
PAGE 172, LINE 7 - PAGE 172, LINE 15	OBJECTION: _____
PAGE 172, LINE 16 - PAGE 172, LINE 20	OBJECTION: _____
PAGE 173, LINE 14 - PAGE 173, LINE 22	OBJECTION: _____
PAGE 178, LINE 7 - PAGE 178, LINE 22	OBJECTION: _____
PAGE 180, LINE 1 - PAGE 180, LINE 6	OBJECTION: _____
PAGE 183, LINE 2 - PAGE 183, LINE 15	OBJECTION: _____
PAGE 184, LINE 1 - PAGE 185, LINE 3	OBJECTION: _____
PAGE 193, LINE 9 - PAGE 193, LINE 18	OBJECTION: _____
PAGE 195, LINE 2 - PAGE 195, LINE 5	OBJECTION: _____
PAGE 195, LINE 19 - PAGE 196, LINE 4	OBJECTION: _____

PAGE 200, LINE 11 - PAGE 200, LINE 24	OBJECTION: _____
PAGE 206, LINE 12 - PAGE 207, LINE 2	OBJECTION: _____
PAGE 207, LINE 19 - PAGE 208, LINE 10	OBJECTION: _____
PAGE 216, LINE 16 - PAGE 217, LINE 7	OBJECTION: _____
PAGE 224, LINE 22 - PAGE 225, LINE 7	OBJECTION: _____
PAGE 226, LINE 3 - PAGE 226, LINE 8	OBJECTION: MOVE TO STRIKE "SO PUTTING ASIDE LAWYER FEES OR COST OF LITIGATION IN THIS CASE"

**COUNTER-DESIGNATION:**

PAGE 87, LINE 3 - PAGE 87, LINE 21	OBJECTION: LACKS FOUNDATION; SPECULATION
PAGE 92, LINE 5 - PAGE 92, LINE 11	OBJECTION: THE REFERENCED TESTIMONY IS NOT RESPONSIVE AND SHOULD BE STRICKEN
PAGE 100, LINE 9 - PAGE 100, LINE 24	OBJECTION: SPECULATION
PAGE 101, LINE 4 - PAGE 101, LINE 14	OBJECTION: _____
PAGE 103, LINE 1 - PAGE 103, LINE 17	OBJECTION: _____
PAGE 111, LINE 5 - PAGE 111, LINE 13	OBJECTION: RELEVANCE
PAGE 120, LINE 21 - PAGE 120, LINE 25	OBJECTION: IMPROPER LEGAL OPINION
PAGE 122, LINE 25 - PAGE 123, LINE 4	OBJECTION: _____
PAGE 123, LINE 22 - PAGE 124, LINE 9	OBJECTION: _____
PAGE 127, LINE 2 - PAGE 127, LINE 17	OBJECTION: _____
PAGE 128, LINE 1 - PAGE 128, LINE 8	OBJECTION: _____
PAGE 129, LINE 1 - PAGE 129, LINE 5	OBJECTION: _____
PAGE 138, LINE 13 - PAGE 138, LINE 15	OBJECTION: _____
PAGE 140, LINE 8 - PAGE 140, LINE 9	OBJECTION: _____
PAGE 141, LINE 1 - PAGE 141, LINE 21	OBJECTION: _____
PAGE 142, LINE 17 - PAGE 142, LINE 18	OBJECTION: _____

PAGE 146, LINE 2 - PAGE 146, LINE 5	OBJECTION: _____
PAGE 146, LINE 18 - PAGE 146, LINE 21	OBJECTION: _____
PAGE 158, LINE 8 - PAGE 158, LINE 15	OBJECTION: RELEVANCE
PAGE 159, LINE 1 - PAGE 159, LINE 6	OBJECTION: _____
PAGE 159, LINE 16 - PAGE 160, LINE 6	OBJECTION: RELEVANCE
PAGE 161, LINE 23 - PAGE 162, LINE 10	OBJECTION: RELEVANCE; LACK OF PERSONAL KNOWLEDGE/LACKS FOUNDATION; SPECULATION
PAGE 162, LINE 20 - PAGE 163, LINE 10	OBJECTION: RELEVANCE; LACK OF PERSONAL KNOWLEDGE/LACKS FOUNDATION; SPECULATION
PAGE 170, LINE 19 - PAGE 170, LINE 25	OBJECTION: RELEVANCE; LACK OF PERSONAL KNOWLEDGE/LACKS FOUNDATION; SPECULATION; HEARSAY
PAGE 172, LINE 21 - PAGE 172, LINE 24	OBJECTION: RELEVANCE; LACKS FOUNDATION; SPECULATION; HEARSAY; INCOMPLETE AND MISLEADING—TO THE EXTENT ADMITTED, INCLUDE 172:25-173:3
PAGE 174, LINE 3 - PAGE 174, LINE 21	OBJECTION: RELEVANCE; LACKS FOUNDATION; SPECULATION; HEARSAY
PAGE 175, LINE 13 - PAGE 175, LINE 19	OBJECTION: RELEVANCE; LACKS FOUNDATION; SPECULATION; HEARSAY
PAGE 185, LINE 4 - PAGE 185, LINE 7	OBJECTION: RELEVANCE
PAGE 193, LINE 19 - PAGE 193, LINE 22	OBJECTION: RELEVANCE; EVERYTHING AFTER THE WORD “YES” IS NONRESPONSIVE AND SHOULD BE STRICKEN
PAGE 194, LINE 2 - PAGE 194, LINE 8	OBJECTION: _____
PAGE 195, LINE 6 - PAGE 195, LINE 18	OBJECTION: _____
PAGE 196, LINE 5 - PAGE 196, LINE 24	OBJECTION: RELEVANCE

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,

BROWN RUDNICK LLP

By: 

RANDALL A. SMITH

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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. ) CASE NO. BC713123  
)  
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 )  
California Corporation; And )  
DOES 1-50, )  
)  
Defendants. )  
\_\_\_\_\_ )

VIDEOTAPED DEPOSITION OF  
GREGG "ROCKY" BROOKS

September 13, 2019

10:41 a.m.

100 West Broadway, Suite 990  
Glendale, California

Kieu Pham, CSR NO. 13667



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15  
16 Also Present:

17 Gigi Fadich, Videographer  
18 Stacey Brooks, Plaintiff's Wife  
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INDEX OF EXAMINATION

WITNESS: GREGG "ROCKY" BROOKS

EXAMINATION	PAGE
BY MR. SMITH	5

INDEX TO EXHIBITS

DEFENDANTS'	PAGE
12 Discovery Responses	28

1 you'll have a chance to review it and sign it and  
2 make changes to it if you think you've either  
3 testified incorrectly at the time or if you think  
4 the reporter took down what you said incorrectly.

5 You should know, though, if you do make 10:44  
6 changes to the transcript, that at the trial of this  
7 case or before trial if we're in court with a motion  
8 proceedings, that I or other lawyers on behalf of  
9 Mr. Depp could comment to the court or the jury that  
10 you told me one thing today and went back later and 10:44  
11 changed it. That might reflect poorly on your  
12 credibility. Do you understand that?

13 A Yes.

14 Q Now, are you on any medication this morning  
15 that would affect your ability to understand my 10:44  
16 questions or give me coherent answers?

17 A No.

18 Q Normally, I ask -- and I'll go ahead and ask  
19 it now so we can discuss this. Is there any reason  
20 your deposition can't proceed today? 10:45

21 A Well, like I stated earlier, that I am in a  
22 lot of pain from neck injuries, and I'm having  
23 recurring symptoms. And -- you know, so I'm in a  
24 little bit of pain, and I haven't been sleeping  
25 well. But I didn't take any pain medication so I 10:45

1 could be clear headed today.

2 Q Perfect. Let me follow up a bit on that so  
3 we can hopefully come up with a game plan of how to  
4 approach this.

5 As I told you off the record and your 10:45  
6 counsel, I don't want to put you through something  
7 that you are physically unable to do, whether it's  
8 going to be putting you in an extreme amount of pain  
9 and then somehow possibly impacting your testimony  
10 today. 10:45

11 A Correct.

12 Q So if -- if you hit a point today where you  
13 think you can't continue anymore because of your  
14 pain, will you tell me that?

15 A I will. 10:46

16 Q If you need to take a break at any point --  
17 and we've discussed off the record that you probably  
18 will need to take some breaks to walk around -- will  
19 you tell me when you need a break?

20 A Absolutely. Definitely. 10:46

21 Q And we talked off the record about how long  
22 this might take, and I think you told me up front  
23 that if this is going to be a whole day, you  
24 wouldn't be able to make that; correct?

25 A That's more than likely correct. 10:46

1 Q Okay.

2 A Yeah.

3 Q And these symptoms, the pain you described  
4 for me, is attributable to a spinal condition; is  
5 that right? 10:50

6 A Cervical and spinal.

7 Q Can you give me a little more detail on what  
8 the cervical and spinal issues are that you have?

9 A I've had a cervical laminectomy in 2015  
10 where the nerve canal is narrowed to the point where 10:50  
11 my nerve -- my feeling in my body was shut off.  
12 They had to shave down the bone so that it could  
13 re -- have a place to go, and that was somewhat  
14 successful.

15 A year later, I had recurring symptoms, and 10:50  
16 they put in two titanium discs to the front of my  
17 neck. And I was -- I had recovered very well from  
18 that, and then I was back at work. And recently,  
19 I've been having recurring symptoms --

20 Q Okay. 10:51

21 A -- so I'm scheduled the 20th to see my  
22 surgeon as a follow-up. I gotta have an MRI --  
23 another MRI taken of my spine this week. It was  
24 supposed to be yesterday, but it was canceled.

25 Q That's on September 20th? 10:51

1 A Yes.

2 Q And the titanium disc you had put into your  
3 neck, that was in 2016?

4 A Yes.

5 Q Okay. 10:51

6 A That was August.

7 Q And you said that you -- after the titanium  
8 discs, you were feeling better for an extended  
9 period of time?

10 A Recovered nicely and well. 10:51

11 Q Okay. And when did you -- when did the  
12 symptoms start to return?

13 A Roughly a month to six weeks ago.

14 THE REPORTER: Can I just ask you to speak  
15 up a little bit for me? 10:51

16 THE WITNESS: Yes. Sorry.

17 BY MR. SMITH:

18 Q Do you have any idea what -- what -- was  
19 there any sort of incident or accident that -- that  
20 happened that would -- led to the recurring  
21 symptoms? 10:52

22 A Getting up and stepping out of bed. Who  
23 knows.

24 Q Now, maybe I can fast forward on some of  
25 this. You've given -- this -- this lawsuit as you 10:52

1 know, relates to a -- an incident that occurred in  
2 April of 2017 on a movie set involving yourself and  
3 Johnny Depp; correct?

4 A That's correct.

5 Q And you've given sworn discovery responses 10:52  
6 in this case indicating that you don't attribute any  
7 physical injuries to that incident with Mr. Depp in  
8 April of 2017.

9 Are you aware that you've given those  
10 answers? 10:52

11 A Yes.

12 Q And is it fair to say then that you don't  
13 attribute any of your current physical conditions to  
14 anything that happened between you and Mr. Depp?

15 A That's correct. 10:52

16 Q Okay. Let me -- let me shift gears, then.  
17 I will remind you if at any point you need to take a  
18 break or we're getting too far down the road, tell  
19 me.

20 A (No audible response.) 10:53

21 Q Have you done anything to prepare yourself  
22 for your deposition today?

23 A I'm not sure I understand what you mean.

24 Q Okay. Have you -- for example, have you  
25 reviewed any documents to get yourself back up to 10:53

1 A So ask the question again, please.

2 Q Do you know one way or the other whether any  
3 person ever actually told Mr. Bertolino that  
4 Mr. Depp was the one that was the source of the  
5 blackballing? 11:02

6 A I'm unsure.

7 Q Now, you -- in this action, you sued Brad  
8 Furman; correct?

9 A Uh-huh.

10 Q Is that a yes? 11:02

11 A Yes.

12 Q And who is Mr. Furman?

13 A Mr. Furman is the director of the movie.

14 Q And you also sued Miriam Segal; is that  
15 correct? 11:03

16 A She's the producer of the movie.

17 Q And you did sue her; correct?

18 A Yes.

19 Q And you eventually dismissed the claims  
20 against Mr. Segal and -- or Ms. Segal and  
21 Mr. Furman; correct? 11:03

22 A Correct.

23 Q To the extent that you have been put on a  
24 no-hire list, is it possible that Mr. Furman might  
25 have some involvement in your appearing on a no-hire 11:03



1 list?

2 A It's possible.

3 Q And to the extent you have actually been on  
4 some sort of no-hire list, is it possible that  
5 Ms. Segal might be responsible for you being on that  
6 no-hire list?

11:03

7 MS. AZIZIAN: Objection. Calls for  
8 speculation.

9 THE WITNESS: It's possible.

10 BY MR. SMITH:

11:04

11 Q As you sit here today, do you have any  
12 knowledge yourself that would enable you to identify  
13 the actual source of the blackballing in terms of  
14 who the person was that did it if it even happened?

15 A My best guess would be it has something to  
16 do with Mr. Depp, Depp's people, and his influence  
17 over Hollywood.

11:04

18 MR. SMITH: I'll move to strike that as  
19 nonresponsive. Let me clarify. I don't mean to be  
20 rude by doing that --

11:04

21 THE WITNESS: I understand.

22 MR. SMITH: -- but this is a process. And  
23 later on, we may be talking with the judge about  
24 whether answers are proper or not, and I have to  
25 protect my record on that.

11:04

1 THE WITNESS: I understand.

2 MR. SMITH: Okay. And I'll -- I'll just  
3 re-ask the question.

4 BY MR. SMITH:

5 Q I don't want you to guess. And you prefaced 11:04  
6 what you said by your best guess.

7 A Uh-huh.

8 Q So would you agree with me that other than  
9 guessing or speculating, you personally can't offer  
10 any testimony one way or the other as to the actual 11:05  
11 source of any blackballing in terms of who the  
12 person was?

13 A That's correct.

14 Q Okay.

15 A I'm sorry. Can I stand up for a second? 11:05

16 Q Sure.

17 MR. SMITH: Let's go off the record.

18 THE VIDEOGRAPHER: Video deposition off the  
19 record at 11:05 a.m.

20 (Whereupon a short break was taken 11:05  
21 from the proceedings.)

22 THE VIDEOGRAPHER: Video deposition  
23 returning to the record at 11:07 a.m.

24 MR. SMITH: Okay.

25 /// 11:07

1 Q And that Good Film Productions, Inc., that's  
2 a reference to the Labyrinth film that you worked  
3 on; correct?

4 A Yes.

5 Q And that's the film where the incident 11:14  
6 between yourself and Mr. Depp occurred; correct?

7 A Yes, correct. Now called City of Lies, yes.

8 Q And so your work history shows that for  
9 several months after it, you went through October  
10 working on other productions on a fairly regular 11:14  
11 basis; correct?

12 A Yes.

13 Q And would you agree with me that none of the  
14 injuries that you attribute to the incident with  
15 Mr. Depp in any way prevented you from working in 11:14  
16 your chosen field, at least through October 8th,  
17 2017?

18 A When you say injuries, does that have  
19 anything to do with the incident?

20 Q Yes. 11:14

21 A Okay. Then yes.

22 Q Okay. So -- and tell me in the period  
23 between June 18, 2017 and October 8, 2017 when you  
24 were -- had these jobs here that came after the  
25 Labyrinth film. 11:15

1 A Yeah. What would you like to know?

2 Q Well, my -- my question simply is -- and I  
3 need to find out from you, but my assumption having  
4 looked at your work history here was that for many  
5 months after the incident, you had no difficulty  
6 obtaining or doing work in your chosen field;  
7 correct?

11:15

8 A Um, it wasn't as easy as it used to be, but  
9 correct.

10 Q And when you say it wasn't as easy as it  
11 used to be, what do you mean by that?

11:15

12 A Well, there were people questioning me about  
13 the incident.

14 Q Okay. And who were those people?

15 A Producers and such.

11:15

16 Q Okay. Putting aside -- and I want to make a  
17 distinction here. So putting aside any negative  
18 ramifications that you think might -- other people  
19 in the industry might have had because you were  
20 involved with the incident --

11:16

21 A Uh-huh.

22 Q -- so set that aside --

23 A Right.

24 Q -- I want to focus only on your physical or  
25 emotional trauma that you suffered from the

11:16

1 incident.

2 Was there anything about your physical or  
3 emotional trauma from the incident that impaired  
4 your ability to work at least through October of  
5 2017?

11:16

6 A Not really, no.

7 Q Okay. So -- and we'll get into the other --  
8 other issues. But in terms of your physical and  
9 mental condition, you'd agree with me that you were  
10 perfectly capable of working after the Labyrinth  
11 incident.

11:16

12 A Yes.

13 Q And would you also agree that any impairment  
14 of your ability to work in later periods has to do  
15 with your belief that you've been blackballed? Is  
16 that right?

11:16

17 A Correct.

18 Q Would you also agree with me that any  
19 impairment of your ability to work in the period  
20 after Labyrinth has nothing to do with any physical  
21 or emotional trauma you claim to have suffered?

11:17

22 A Can you repeat the question, please?

23 Q Sure. I just want to understand the lay of  
24 the land in your point of view.

25 A Right.

11:17

1 Q Would you agree with me that no physical or  
2 emotional trauma that you attribute to the incident  
3 has impaired your ability to work since the incident  
4 occurred?

5 A I would disagree, and I would say emotional 11:17  
6 trauma is certainly rising its ugly head.

7 Q Okay. And when did -- when did emotional  
8 trauma begin to have any impact on your ability to  
9 work?

10 A I would say after filing suit, the story 11:17  
11 coming out in the news, and then false stories  
12 coming out afterwards in the news really took a big  
13 hit on my emotional stability.

14 Q Okay. Would you agree with me that up  
15 through the filing of your complaint, that up 11:18  
16 through that point in time, your physical and  
17 emotional state had no -- let me start over.

18 Focusing on the period of time between the  
19 incident on Labyrinth in April 2017 and the date you  
20 filed your complaint -- and I can represent to you 11:18  
21 that was July 6th of 2018.

22 A Right.

23 Q Would you agree with me that between April  
24 2017 and July 2018, no physical or emotional trauma  
25 that you attributed to the incident impacted your 11:18

1 ability to work?

2 A I would agree with the physical part, but  
3 the mental part is just having to do with people  
4 questioning me about the incident all the time, and  
5 it becomes a little bit overburdening or -- you 11:19  
6 know, it's a drag on you after awhile. So -- but  
7 yeah, I kept moving on and shrugging shoulders and  
8 just another --

9 Q But I -- stop me if I'm wrong, and I want to  
10 clarify this. I think what you told me was the 11:19  
11 questioning that led to your emotional concerns,  
12 that questioning really started after you filed your  
13 complaint; correct?

14 A That's when it -- the volcano erupted. But  
15 before that, it was always a constant. 11:19

16 Q Okay. So before you filed your complaint,  
17 from time to time, people would ask about the  
18 incident when you were seeking employment?

19 A Everybody would ask about it when they've  
20 heard who I was -- 11:19

21 Q Okay.

22 A -- or found out who I was or found out about  
23 the story. Everybody. There was no escaping it.

24 Q And that caused you to have anxiety?

25 A Absolutely. 11:19

1 Q What's the first time you can recall in your  
2 own mind's eye when any other person raised this  
3 incident as it related to your reference to find  
4 employment?

5 A After filing suit. 11:20

6 Q Okay.

7 MS. AZIZIAN: For clarification, that was  
8 for employment -- it was raised with relation to  
9 employment; correct?

10 MR. SMITH: Can you read back my last 11:20  
11 question and his answer.

12 THE REPORTER: What's the first time you can  
13 recall in your own mind's eye when any other person  
14 raised this incident as it related to your reference  
15 to find employment? After filing suit. 11:20

16 MS. AZIZIAN: Thank you.

17 BY MR. SMITH:

18 Q And that would have been after the complaint  
19 was filed.

20 A Yes. 11:21

21 Q Tell me how you wound up getting the  
22 position on Labyrinth.

23 A I was on the availability list. Labyrinth  
24 had completed their principal photography but had  
25 gone over schedule, and they had lost their actors 11:21



1 set, so they had just walked away and let it -- they  
2 were paying for it as we were shut down.

3 So I had to keep the -- you know, make sure  
4 everything was going smoothly with the Barclay Hotel  
5 and then also deal with all of our new locations, 11:23  
6 the Petersen Museum where I shut down Fairfax and  
7 Wilshire Boulevard for the reenactment of the Biggy  
8 Small murder, we shot at the El Rey Theatre, various  
9 locations.

10 It's my responsibility to procure them, do 11:23  
11 the contracts, insurance, all the hiring of security  
12 and fire and police. That's my job.

13 Q So you get -- you're responsible for  
14 securing the locations from soup to nuts?

15 A From soup to nuts. 11:23

16 Q Who -- who was your employer on the  
17 Labyrinth production, if you know?

18 A What do you mean by employer?

19 Q Who wrote your paychecks?

20 A Good Film Productions. 11:24

21 Q And were you working on an independent  
22 contractor basis on behalf of Good Film Productions?

23 A Yes.

24 Q So Good Film Productions didn't, for  
25 example, provide you with health benefits; correct? 11:24

1 A No. I work for my health benefits through  
2 the union, and you need to have a certain amount of  
3 hours to accrue them.

4 Q Okay. So employment-type benefits in your  
5 line of work is something that you get through your  
6 union position; correct? 11:24

7 A Uh-huh.

8 Q Is that a yes?

9 A Yes. Sorry.

10 Q And your contract then with Good Film was  
11 essentially on an independent contractor basis;  
12 correct? 11:24

13 A Correct.

14 Q And who did you report to at -- well, who  
15 did you report to on the Labyrinth matter? 11:24

16 A My -- the head of me is Bruce Wayne Gillies  
17 (unintelligible)

18 THE REPORTER: I'm sorry. What producer? -

19 THE WITNESS: Bruce Wayne Gillies.

20 THE REPORTER: What did you say after that? 11:25

21 THE WITNESS: He was the line producer that  
22 hired me.

23 BY MR. SMITH:

24 Q Line -- like, line down the street?

25 A Yes. 11:25

1 I may have walked over and told Miriam  
2 myself. I don't recall. You just let everybody  
3 know you got the extension. So --

4 Q Was Ms. Segal difficult to work with?

5 A Extremely. 12:02

6 Q And give me a little overview on that. Why  
7 do you say she's extremely difficult to work with?

8 A You know, just bully. She's a bully and  
9 didn't really listen to reason. And when I took  
10 over the job, I was warned by the previous location 12:03  
11 department and all -- most department heads on the  
12 show that this is a different kind of movie and that  
13 it's really toxic.

14 Q Okay. And did anybody elaborate on what  
15 they meant by it's really toxic? 12:03

16 A They elaborated by the triangle relationship  
17 of Johnny, Miriam, and Brad.

18 Q And what do you mean by the triangle  
19 relationship between the three of them?

20 A The three of them as director, producer, 12:03  
21 A-list actor and star of the movie.

22 Q And so people that were working on the  
23 production told you that that three-way combination  
24 was not healthy?

25 A Yes. 12:03

1 Q And that it was a three-way combination that  
2 was a difficult work environment?

3 A Yes.

4 Q Did you share those views once you began  
5 working on the project? 12:04

6 A Yes.

7 Q Was Mr. Furman also difficult to work with?

8 A Extremely.

9 Q And what about Mr. Furman was difficult to  
10 work with? 12:04

11 A Again, just combative, doesn't really listen  
12 to reason, only wanted his way, did things that  
13 didn't really make sense, you know, and wasted a lot  
14 of time.

15 Q And what do you mean he wasted a lot of  
16 time? 12:04

17 A Indecisions, just unprofessionalism. Sorry.  
18 Okay.

19 Q All right?

20 A Yeah. 12:04

21 Q So give me your recollection. Once you  
22 communicated to Mr. Gillies that you'd gotten the  
23 extensions to 11 o'clock and midnight for the inside  
24 shoot, what do you recall next happening that day?

25 A The day went on as usual. We did our 12:05

1 filming, everything was as usual. The usual hectic  
2 film set trying to get everything done with a  
3 timeline. It's nothing unusual.

4 Q And did -- was -- from your observation,  
5 were things going along business as usual right up 12:05  
6 to the point you had the encounter with Mr. Depp?

7 A Somewhat, yes.

8 Q And --

9 A As usual.

10 Q By somewhat, I take that as a qualification. 12:05  
11 What was not business as usual prior to the incident  
12 with Mr. Depp?

13 A I -- just movie production nonsense. That's  
14 all. It's no specific thing. It's just all the ins  
15 and outs and minutia of, like, can we just get 12:05  
16 through this day and all the craziness that  
17 surrounds it. I couldn't give you any specific.

18 Q Would you agree that day was getting tense  
19 all the way around because of the impending  
20 deadlines? 12:06

21 A Yes. It's the last day of filming.

22 Q So would you agree that Ms. Segal and  
23 Mr. Furman were particularly difficult to work with  
24 that day?

25 A Most likely. 12:06

1 Q Would you also agree that Mr. Depp was under  
2 time constraints that day as a co-producer?

3 A Absolutely.

4 Q Would you agree that the -- the general  
5 feeling on the set before the incident was somewhat  
6 tense? 12:06

7 A It was every day.

8 Q Was it more tense that day?

9 A It's hard to say.

10 Q Okay. Do you recall if you had any  
11 interactions with people besides Mr. Depp right  
12 before the incident that you would characterize as  
13 in any way tense? 12:06

14 A Yes.

15 Q And tell me what such interactions you had  
16 before the incident. 12:06

17 A There was an incident with the security  
18 guard for Gilmore Associates.

19 Q Okay. And tell me what you recall about the  
20 interaction between yourself and that security  
21 guard. 12:07

22 A Well, the problem with Richard Wynn and  
23 Gilmore Associates are that they -- Gilmore  
24 Associates owns all the filming properties around  
25 the area that we were filming, and they like to 12:07

1 extort money from productions who are silly enough  
2 to pay them for no reason.

3 And our movie was over budget and over  
4 deadline, and they were trying to extort money from  
5 our production. And it's my job as a location 12:07  
6 manager to make sure that doesn't happen.

7 And so when they try to extort money  
8 unsuccessfully from the production, Richard Wynn who  
9 is in charge of filming at Gilmore Associates sent  
10 his security guard out on the street to take 12:08  
11 videotape.

12 Q How do you know that?

13 A Because he was.

14 Q How do you know Mr. Wynn sent the security  
15 guard to do videotape? 12:08

16 A Because that's what he does every time.  
17 That's his MO. He always has a security guard film  
18 other people's production so that they have record  
19 of it so that they -- it's a battle of Film LA.

20 Q And when you say your perception of Gilmore 12:08  
21 Associates somehow trying to extort the production,  
22 what do you mean by that?

23 A So they own all the properties. And in one  
24 incident, there's some lights that are -- from the  
25 Barclay Hotel connected to their property and we 12:08

1 wanted to get them turned off and they wanted \$2,500  
2 to have them turned off. So we just said no, we'll  
3 leave them on, thank you.

4 And -- and the other time is when we were  
5 going to be out on the street doing this filming 12:09  
6 with Johnny closing the street. We are in front of  
7 the Gilmore Associates old bank building which is on  
8 Fourth Street.

9 It's an empty building and there's no  
10 business inside of it, so our filming is not 12:09  
11 impeding with their course of business or any of  
12 their residences.

13 Q And how -- how did you observe them trying  
14 to do any type of extortion as it pertained to this  
15 bank building on that day? 12:09

16 A Well, in order for me to get extended hours,  
17 we have to have the -- Richard Wynn who represents  
18 Gilmore Associates sign off on anything permit-wise.  
19 And for me to get extended hours, they have to sign  
20 off on it. 12:10

21 Q What happens if he were to refuse to sign  
22 off?

23 A Well, it just depends. Usually -- usually  
24 people pay, and he signs off. But I immediately  
25 started an e-mail chain with Film LA and my film 12:10



1 coordinator, and I showed them the text chain that  
2 he was trying to get \$2,500 for us to film out  
3 there.

4 And I, you know, had the backing of Film LA  
5 that you do not need to pay him anything. You are 12:10  
6 on a public sidewalk, and you're not responsible for  
7 paying him anything.

8 Q So Film LA said don't pay him.

9 A Correct.

10 Q And then what happened from there in 12:11  
11 relation to your interaction with anybody from  
12 Gilmore?

13 A Well, I was -- you know, it's a game that we  
14 play with Richard Wynn and I got a little excited  
15 and he sent the security guard out there and I 12:11  
16 flipped him off behind my back because I was sending  
17 a little love message to Richard Wynn. It was  
18 nothing -- had nothing to do with anything else.

19 Q How -- and let me back up. So -- so  
20 Mr. Wynn -- was it Mr. Wynn personally that refused 12:11  
21 to sign off on the extension?

22 A Yeah. He did not sign off on the extension.

23 Q And did he communicate that directly to you?

24 A Um, he didn't sign off on it. I don't know  
25 who he communicated to or not. We went ahead and 12:11

1 REPORTER'S CERTIFICATION

2  
3 I, KIEU PHAM, a Certified Shorthand  
4 Reporter, in and for the State of California, do  
5 hereby certify:

6 That the foregoing witness was by me duly  
7 sworn; that the deposition was then taken before me  
8 at the time and place herein set forth; that the  
9 testimony and proceedings were reported  
10 stenographically by me and later transcribed into  
11 typewriting under my direction; that the foregoing  
12 is a true record of the testimony and proceedings  
13 taken at that time.

14  
15  
16 IN WITNESS WHEREOF, I have subscribed my  
17 name this 26th day of September, 2019.

18  
19  
20 

21 \_\_\_\_\_  
Kieu Pham, CSR NO. 13667

22  
23 (The foregoing certification of this transcript does  
24 not apply to any reproduction of the same by any  
25 means, unless under the direct control and/or  
supervision of the certifying reporter.)

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DEPOSITION ERRATA SHEET

Assignment No. 48085

Case Caption: Brooks v. Depp, et al.

DECLARATION UNDER PENALTY OF PERJURY

I declare under penalty of perjury that I have read the entire transcript of my Deposition taken in the above captioned matter or the same has been read to me, and the same is true and accurate, save and except for changes and/or corrections, if any, as indicated by me on the DEPOSITION ERRATA SHEET hereof, with the understanding that I offer these changes as if still under oath.

Signed on the \_\_\_\_\_ day of \_\_\_\_\_,  
20\_\_\_\_.

\_\_\_\_\_

GREGG "ROCKY" BROOKS

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

GREGG "ROCKY" BROOKS, )  
)  
Plaintiff, )  
)  
vs. ) CASE NO. BC713123  
)  
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 )  
California Corporation; And )  
DOES 1-50, )  
)  
Defendants. )  
\_\_\_\_\_ )

VOLUME II  
VIDEOTAPED DEPOSITION OF  
GREGG "ROCKY" BROOKS

September 25, 2019  
11:03 a.m.

100 West Broadway, Suite 990  
Glendale, California

Kieu Pham, CSR NO. 13667

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17 Also Present:

18 Izabella Morrissey, Videographer  
19 Stacey Brooks, Plaintiff's Wife  
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INDEX OF EXAMINATION

WITNESS: GREGG "ROCKY" BROOKS

EXAMINATION	PAGE
BY MR. SMITH	75

INDEX TO EXHIBITS

DEFENDANTS'	PAGE
34 Plaintiff's Responses to Special Interrogatories - Set Two	150
35 Text Messages	176
36 List of Employers	179
37 8/22/19 Terre Bridgham's, MFT, ATR File re: Gregg "Rocky" Brooks	201
38 Form Interrogatories - General	212

1 happened on the evening of April 12, 2017?

2 A Yes.

3 Q And how many other discussions have you had  
4 with Mr. Duffy?

5 A Just one. 11:08

6 Q Okay. When was that discussion?

7 A That was right after the New York Post  
8 article came out and he called me.

9 Q And when did the New York Post article come  
10 out as best you recall? 11:08

11 A May of 20 -- (inaudible)

12 THE REPORTER: 20 --

13 THE WITNESS: '18, I believe.

14 BY MR. SMITH:

15 Q And was that before or after your lawsuit  
16 had been filed? 11:08

17 A That was before.

18 Q Is the New York Post article from May of  
19 2018 the first published article about the incident  
20 that you can recall ever learning about? 11:08

21 A Yes.

22 Q So fair to say that prior to May -- prior to  
23 the New York Post article being published in May of  
24 2018, you never heard that there was any sort of  
25 other press coverage about the incident; correct? 11:08

78

1 A That's correct.

2 Q Okay. And you said Mr. Duffy called you  
3 after the New York Post article came out in May?

4 A That's correct.

5 Q And tell me what you recall about that 11:09  
6 discussion.

7 A We -- I was driving and we were in a bad  
8 cell zone, so we had discussion that was hard to  
9 hear from each other. Eventually, I called him  
10 back, and we discussed the article and went over 11:09  
11 again the case -- the -- the -- what happened on  
12 set.

13 Q In either of these discussions with  
14 Mr. Duffy, did you tell him that Mr. Depp had  
15 physically struck you? 11:09

16 A Yes.

17 Q And tell me as best you can recall what you  
18 conveyed to him about that.

19 A I told him that in the process of enforcing  
20 the permit for Film LA, I walked up to the first AD 11:09  
21 and told him that it was the last shot, and I was  
22 directed by Brad Furman, the director, to tell that  
23 to Johnny Depp. And I went over to tell my officer,  
24 John Bigrigg, to enforce the permit.

25 Q What else did you tell Mr. Duffy about 11:10



1 THE WITNESS: They were not in my purview.

2 MR. SMITH: Okay.

3 BY MR. SMITH:

4 Q And do you have any idea why Mr. Depp  
5 approached you to speak with you? 11:17

6 MS. ARMINAK: Objection. Calls for  
7 speculation.

8 THE WITNESS: Is that --

9 MS. ARMINAK: Ignore my objection --

10 THE WITNESS: Sorry. 11:17

11 MS. ARMINAK: -- and answer the question if  
12 you can.

13 THE WITNESS: Ask the question again.

14 BY MR. SMITH:

15 Q Did you have any idea why Mr. Depp 11:17  
16 approached you in the first place?

17 MS. ARMINAK: Same objection.

18 THE WITNESS: No.

19 BY MR. SMITH:

20 Q Would Mr. Depp have had any reason to know 11:17  
21 that you were doing anything to shut down the  
22 production at the time he approached you?

23 MS. ARMINAK: Objection. Calls for  
24 speculation.

25 THE WITNESS: No. 11:17

1 MR. SMITH: Okay.

2 BY MR. SMITH:

3 Q So as you sit here today knowing all the  
4 events that transpired, can you think of any reason  
5 why it was that Mr. Depp approached you that 11:18  
6 evening?

7 A He -- he overheard Brad Furman tell me to go  
8 tell him it was the last shot.

9 Q So you believe Mr. Depp heard that and then  
10 approached you for that reason? Is that your 11:18  
11 testimony?

12 A Absolutely.

13 Q Okay. How close was Mr. Furman at the time  
14 Mr. Depp interacted with you that evening?

15 A Mr. Furman and Mr. Silver were next to each 11:18  
16 other, and I am not sure where Mr. Depp was. I was  
17 not looking for him at the time.

18 Q So -- and when you say you weren't sure  
19 where Mr. Depp was at the time, you're referring now  
20 to the moments before he approached you; correct? 11:18

21 A That's correct.

22 Q At the time Mr. Depp approached you and came  
23 within a few feet of you, do you recall how close  
24 Mr. Furman was to the two of you?

25 A Ten feet. 11:18

1 Q Okay. Was his view of the interaction  
2 between yourself and Mr. Depp blocked in any way to  
3 your knowledge?

4 MS. ARMINAK: Objection. Calls for  
5 speculation. 11:19

6 THE WITNESS: I don't believe so.

7 MR. SMITH: Okay.

8 BY MR. SMITH:

9 Q So from your recollection of that evening,  
10 you would have expected that Mr. Furman would have 11:19  
11 had a clear view of what took place between yourself  
12 and Mr. Depp that evening; correct?

13 MS. ARMINAK: Objection. Speculation.

14 THE WITNESS: Correct.

15 MR. SMITH: Okay. 11:19

16 BY MR. SMITH:

17 Q Now, let's continue going through  
18 chronologically here -- I think where we left off  
19 was you said you were surprised and -- and Mr. Depp  
20 approached you from your left-hand side and came 11:19  
21 within a few feet of you; correct?

22 A Yes.

23 Q And he then raised his voice at you;  
24 correct?

25 A Yes. 11:19

1 A No.

2 Q Are you sure of that?

3 A No.

4 Q Let me -- let me back up and give you one of  
5 the ground rules I didn't remind you of at the 11:21  
6 outset.

7 A Sorry.

8 Q I don't want you to speculate on anything.

9 A Okay.

10 Q Don't assume because I ask you an answer -- 11:22  
11 or ask you a question, you have to know an answer.  
12 So if I ask you a question and you honestly don't  
13 know, you should tell me I don't know or I don't  
14 remember; okay?

15 A Yes. 11:22

16 Q Okay. So is it fair to say you don't  
17 remember whether you were wearing a coat that  
18 evening or not at the time you had this exchange  
19 with Mr. Depp; correct?

20 A That's correct. 11:22

21 Q Okay. Did you shout out in pain when you  
22 were hit with either of these punches?

23 A No.

24 Q Did you get the wind knocked out of you when  
25 you were hit by either of these punches? 11:22

1 A No.

2 Q Did you drop to a knee at the time you were  
3 hit with either of these punches?

4 A No.

5 Q Did you make any sort of physical reaction 11:22  
6 that would indicate you were in any sort of pain or  
7 distress at the time you were hit with either of  
8 these punches?

9 A I was more surprised.

10 Q Is that a no to my question? 11:22

11 A The punches hurt.

12 Q Okay. Did you make a physical reaction when  
13 you were hit with these punches?

14 A I don't remember.

15 Q Did either of the punches bring you to 11:23  
16 tears?

17 A No.

18 Q Did either of the punches knock you down?

19 A No.

20 Q Did either of the punches leave any physical 11:23  
21 marks on your body?

22 A No.

23 Q And by your answer to that question, is it  
24 your testimony that -- that you did not have any  
25 bruising on your body based on these punches? 11:23

1 A I don't recall seeing any bruising.

2 Q Okay.

3 A Doesn't mean it wasn't there.

4 Q Okay.

5 MR. SMITH: I'll move to strike everything 11:24  
6 after doesn't mean it wasn't there as nonresponsive  
7 to the question posed just so I get a clean  
8 record -- as I told you before, from time to time,  
9 your counsel may interpose objections --

10 THE WITNESS: Right. 11:24

11 MR. SMITH: -- or I may say things like  
12 that. I don't mean that as any disrespect to you.  
13 I'm protecting a record to talk with the judge later  
14 on in this case.

15 THE WITNESS: Yes. 11:24

16 BY MR. SMITH:

17 Q Is it -- is it your testimony today that you  
18 don't recall either of these punches causing you to  
19 suffer any bruising?

20 A That's correct. 11:24

21 Q Is it also fair then to say that after this  
22 incident, you didn't make any effort to take any  
23 pictures showing any bruising on your body; correct?

24 A Yes.

25 Q That's -- that's fair to say? 11:24

1 Q And during that discussion, did you discuss  
2 what had happened between yourself and Mr. Depp?

3 A I do not remember.

4 Q Do you have any sort of formal training in  
5 self-defense? 11:32

6 A No.

7 Q Have you ever served in the military?

8 A No.

9 Q Now, in the complaint you filed in this  
10 action -- and I'm going to paraphrase, but the 11:32  
11 allegations indicate words to the effect that  
12 throughout the incident with Mr. Depp, you remained  
13 calm. Would you agree with that?

14 MS. ARMINAK: Objection. Lacks foundation.

15 THE WITNESS: Yes. 11:32

16 BY MR. SMITH:

17 Q As best you can do it, can you describe for  
18 me what your demeanor was after you got struck by  
19 Mr. Depp? How did you react, if at all?

20 A To the best of my recollection, once I was 11:33  
21 approached by Mr. Depp and started being screamed at  
22 and berated in front of the whole crew and then  
23 being punched, I don't really remember.

24 I just know that I had to stay calm because  
25 it's my job to stay calm and diffuse situations. 11:33

1 But in my mind, I was thinking this is unbelievable  
2 to me. I cannot believe this is happening. This is  
3 so unreal.

4 Q Looking backwards on this interaction  
5 between yourself and Mr. Depp, do you believe that 11:33  
6 Mr. Depp intended to cause you any sort of harm at  
7 the time of this exchange?

8 A I don't know what he intended.

9 MS. ARMINAK: Objection. Calls for  
10 speculation. 11:34

11 BY MR. SMITH:

12 Q Looking backwards in time, do you have any  
13 reason to believe that Mr. Depp intended to somehow  
14 offend you by his conduct?

15 A Yes. 11:34

16 Q And what about the events caused you to say  
17 that you have that belief?

18 A He approached me, he belittled me in front  
19 of the crew, he punched me when I was doing my job.  
20 Due to protocol, Film LA says wrap up the permit, 11:34  
21 and that's what I'm doing.

22 My interaction -- my interaction was never  
23 supposed to be with Mr. Depp. So yes, I was very  
24 surprised and taken aback.

25 Q Would you agree the best person to ask about 11:35



1 Mr. Depp's intentions were at that time would be  
2 Mr. Depp himself?

3 A Yes.

4 Q You say Mr. Depp belittled you in front of  
5 the crew. And were there particular words that  
6 Mr. Depp used that you considered to be a belittling  
7 towards you?

11:35

8 A Who the fuck are you, what the fuck do you  
9 think you're doing.

10 Q Any other words that you consider to be  
11 belittling directed at you by Mr. Depp?

11:35

12 A Yes, that and he said I don't give a fuck  
13 who you are or what you're doing and then punching  
14 me is pretty belittling also, I would believe.

15 MS. ARMINAK: Do you need to take a break?

11:36

16 THE WITNESS: I'm getting to that point,  
17 yes.

18 MR. SMITH: Okay. Go off the record.

19 THE VIDEOGRAPHER: The time is 11:36 a.m.,  
20 and we are off the record.

11:36

21 (Whereupon a short break was taken  
22 from the proceedings.)

23 THE VIDEOGRAPHER: The time is 11:54, and we  
24 are back on the record.

25 ///

11:53

1 BY MR. SMITH:

2 Q Mr. Brooks, I want to back up and ask you a  
3 few more questions about the exchange where you say  
4 Mr. Depp screamed at you and hit you with a couple  
5 punches -- 11:53

6 A Correct.

7 Q -- okay?

8 A Yes.

9 Q Can you remember how long the incident with  
10 Mr. Depp lasted between the time you recall him 11:53  
11 approaching you and raising his voice to the time  
12 his bodyguards left with him? How long did the  
13 whole thing last?

14 A It seemed like forever, but I don't know.

15 Q Can you give us any estimate? 11:54

16 A (Inaudible response.)

17 THE REPORTER: I'm sorry?

18 THE WITNESS: A couple minutes.

19 BY MR. SMITH:

20 Q At any point during that interaction, did 11:54  
21 you call out to anyone else to help you?

22 A No.

23 Q At any point in that interaction, did you  
24 ever consider turning and fleeing?

25 A No. 11:54

1 Q Why not?

2 A I didn't consider it.

3 Q Were you ever fearful for your own personal  
4 safety?

5 A Yes. 11:54

6 Q And describe for me what your feelings were  
7 in that regard?

8 A Again, I'm standing there on set, I've just  
9 been punched twice by a big star and being yelled  
10 at, offered to punch him in the face for \$100,000. 11:54

11 That was a very scary situation to me. I've  
12 never encountered anything like that in my 25 years  
13 of production experience, and I was very scared.

14 Q That being said, is there any reason you  
15 didn't reach out to anyone else that was in that  
16 same vicinity and ask for any kind of help? 11:55

17 A It was a spur of the moment thing. No.

18 Q Sticking with the -- this incident here  
19 again for a few moments, can you -- can you recall  
20 any physical reaction you displayed when you were  
21 hit with these punches? 11:55

22 MS. ARMINAK: Objection. Asked and  
23 answered.

24 THE WITNESS: I don't remember.

25 /// 11:55

1 BY MR. SMITH:

2 Q Can you even recall flinching at the time  
3 you were hit with either of these punches?

4 MS. ARMINAK: Objection. Asked and  
5 answered. 11:55

6 THE WITNESS: I don't remember.

7 BY MR. SMITH:

8 Q Can you recall dropping your arms to your  
9 side to cover up after you were hit with either of  
10 these punches? 11:56

11 MS. ARMINAK: Objection. Lacks foundation.

12 THE WITNESS: No.

13 BY MR. SMITH:

14 Q Is it -- is it fair to say that as you sit  
15 here today, you really don't recall what physical  
16 reaction, if any, you had at the time these punches  
17 were landed on? 11:56

18 MS. ARMINAK: Objection. Misstates  
19 testimony.

20 THE WITNESS: Can you repeat the question? 11:56

21 MR. SMITH: Sure.

22 BY MR. SMITH:

23 Q Is it fair to say that you just don't recall  
24 one way or the other what physical reaction, if any,  
25 you had at the time these punches were landed on? 11:56

104

1 MS. ARMINAK: Depends on the psychology of  
2 the person, I guess.

3 THE WITNESS: Everybody's different.

4 BY MR. SMITH:

5 Q How long before the incident between  
6 yourself and Mr. Depp was it that you saw Mr. Depp  
7 smoking marijuana on the balcony?

12:04

8 A Within a couple hours.

9 Q Okay. Was the incident where you saw  
10 Mr. Depp smoking marijuana on the balcony the only  
11 time that day that you saw Mr. Depp do any sort of  
12 drugs on the set?

12:04

13 A Yes.

14 Q Have you ever personally observed Mr. Depp  
15 take any other sort of drugs other than marijuana?

12:04

16 A No.

17 Q Did you actually -- well, when you observed  
18 Mr. Depp on the balcony of the Barclay, could you  
19 smell what was being smoked?

20 A Yes.

12:05

21 Q Can you describe for me what you smelled?

22 A I smelled burning marijuana.

23 Q Is it fair to say from your own personal  
24 experience you knew at that point in time what  
25 marijuana smelled like?

12:05

1 within ten feet of me, and he was the person I was  
2 walking towards when the incident happened.

3 Q As you sit here today, can you remember  
4 anything Mr. Rigg told you in this phone  
5 conversation that caused you to believe that he had 12:09  
6 witnessed Mr. Depp punch you?

7 MS. ARMINAK: Objection. Asked and  
8 answered.

9 THE WITNESS: He did not -- he knew that  
10 there was a -- a -- an altercation between the two 12:09  
11 of us. He did not see the punch.

12 MR. SMITH: Fair enough. And I'm not trying  
13 to --

14 THE WITNESS: Yeah.

15 MR. SMITH: -- trick anyone. I just want to 12:09  
16 know what everybody told you.

17 THE WITNESS: Yes.

18 BY MR. SMITH:

19 Q Now, you say you talked to Mr. Rigg two  
20 times; is that correct? 12:09

21 A Yes.

22 Q Tell me, how did the second discussion come  
23 about?

24 A I called him --

25 Q And -- 12:10

1 I'm not sure.

2 MS. ARMINAK: Okay.

3 BY MR. SMITH:

4 Q Do you remember ever speaking with Malcolm  
5 Connelley about the incident? 12:14

6 A I don't remember Malcolm. Who's Malcolm  
7 Connelley?

8 Q Okay. Let's -- let me shift gears now at  
9 least from the witnesses, and we can go back to the  
10 incident. Let me know -- I tend to get kind of 12:15  
11 locked in.

12 A Okay.

13 Q So if I'm oblivious to your needs, you need  
14 to tell me.

15 A I got a few minutes left in me. 12:15

16 Q All right. So after Mr. Depp and his  
17 bodyguards went back to what they were doing after  
18 the exchange with you, what do you next remember  
19 doing on the set in terms of performing your job  
20 functions? 12:15

21 A Again, I remember making sure the streets  
22 got cleared and that we were off the streets, the  
23 street was reopened, and the lights were gone and  
24 the cables were off, and then I remember being  
25 upstairs for wrap. 12:16

1 Q And what's -- what does wrap mean?

2 A When we finish filming.

3 Q And what role, if any -- well, what was your  
4 job function in relation to wrapping up the filming?

5 A Again, I'm the location manager, and I'm 12:16  
6 responsible for making sure that permit's enforced.

7 Q And did you continue to perform your job  
8 functions as production manager that entire --  
9 manager that entire evening?

10 A Yes. 12:16

11 Q Were you physically and emotionally able to  
12 perform your job functions that evening after the  
13 incident?

14 A Yes.

15 Q Did you ever file a police report in 12:16  
16 relation to what had occurred between yourself and  
17 Mr. Depp?

18 A No.

19 Q Why not?

20 A Did not occur to me. 12:16

21 Q Did you believe the evening of the incident  
22 that Mr. Depp had -- had assaulted you?

23 A Yes. \

24 Q Did you ever talk with anyone -- I want to  
25 exclude your wife and your lawyers. I don't want to 12:17

120



1 MS. ARMINAK: His and his wife's, yes.

2 MR. SMITH: Okay.

3 THE WITNESS: I was surprised.

4 BY MR. SMITH:

5 Q At the time -- on the evening of the 12:18  
6 incident, was it your understanding that Mr. Bigrigg  
7 was actually employed by the LAPD?

8 A He's a retired officer.

9 Q Okay. And how do you know that?

10 A Because he is a retired LAPD officer. 12:18

11 Q Did he tell you that?

12 A Yes. I've worked with him many times.

13 Q Have you worked with Bigrigg since the City  
14 of Lies project?

15 A I believe he may have -- yes, I think so. 12:18

16 Q Can you remember what projects you worked  
17 with him on?

18 A No.

19 Q Did you ever ask any member of law  
20 enforcement to do anything to investigate what had 12:18  
21 happened between yourself and Mr. Depp?

22 A No.

23 Q Why not?

24 A Did not occur to me.

25 Q At any point through to today, did you seek 12:19

1 any sort of medical -- medical treatment for -- in  
2 relation to anything that happened to you with the  
3 incident with Mr. Depp?

4 A Just therapy.

5 Q Well, we can break that up. Do I correctly 12:19  
6 understand that from the moment that Mr. Depp landed  
7 these punches on you on the set through today, you  
8 haven't seen any medical doctor for any complaints  
9 about what happened to you?

10 A No. 12:19

11 Q No, I don't understand or no, you haven't  
12 seen a medical --

13 A No, I have not seen a medical doctor.

14 Q Is that because you didn't feel the need to  
15 seek medical treatment? 12:19

16 A Yes.

17 Q And you've given some sworn discovery  
18 responses in this case that say essentially that the  
19 injuries you're claiming are emotional injuries, not  
20 physical. Is that still your position? 12:20

21 A Yes.

22 Q And would you agree with me today that you  
23 didn't suffer any physical injuries as a result of  
24 this incident?

25 A No. 12:20

1 Q No, you wouldn't agree or no, you didn't  
2 suffer any physical injuries?

3 A He hit me, it hurt. So that's a physical  
4 injury.

5 Q Would you agree with me that the -- that 12:20  
6 physical injury was never something that rose to the  
7 level that caused you to think you needed any sort  
8 of medical treatment?

9 A Yes.

10 Q Did you do anything to self-medicate 12:20  
11 yourself for any physical pain as a result of  
12 anything that happened in the incident?

13 MS. ARMINAK: Objection. Vague and  
14 ambiguous as to self-medicate.

15 THE WITNESS: I go home, and I take my, you 12:21  
16 know, nighttime pain medication for my injuries.

17 BY MR. SMITH:

18 Q And -- and the injuries you're referring to  
19 now are the injuries relating to your spinal cord?

20 A Yes. 12:21

21 Q Okay. And the injuries relating to your  
22 spinal cord are not something you attribute to  
23 Mr. Depp; correct?

24 A That's correct.

25 Q As long as we're on that subject, let me 12:21

1 MR. SMITH: Fair enough.

2 BY MR. SMITH:

3 Q You don't know her credentials one way or  
4 the other; correct?

5 A I guess not. 12:41

6 Q But you know she's a family therapist;  
7 correct?

8 A Yes.

9 Q And you actually had sought assistance from  
10 Ms. Bridgham prior to the incident; correct? 12:41

11 A Correct.

12 Q Okay. Is the only professional that you've  
13 sought any sort of treatment from as a result of the  
14 incident, would that be Ms. Bridgham?

15 A Yes. 12:41

16 Q Okay. And since the incident happened, how  
17 many times have you visited Ms. Bridgham to seek  
18 treatment?

19 A At this point, three.

20 Q Were two of those within the past few  
21 months? 12:41

22 A Yes.

23 Q Do you recall the evening of the incident  
24 while things were wrapping up that you sat down with  
25 Mr. Depp and had a talk? 12:42

126

1 A I recall at wrap he apologized to me.

2 Q And let me -- let me back up. How -- do you  
3 remember how it was you came to talk with Mr. Depp  
4 during the wrap?

5 A I was -- yes. I was on the second floor of 12:42  
6 the Barclay Hotel --

7 Q Okay.

8 A -- where we were finishing up filming for  
9 the night. Camera had wrapped, and he approached me  
10 to apologize. 12:42

11 Q Did he approach you or did someone on his  
12 behalf say that Mr. Depp wanted to speak with you?

13 A I -- I don't remember.

14 Q Okay.

15 A I -- I -- that may have happened, but I 12:43  
16 really don't remember how it happened. I just  
17 remember he came up to me with an apology.

18 Q And where were you when he offered the  
19 apology?

20 A In the second -- in the Barclay set on the 12:43  
21 second floor.

22 Q Did you actually sit down with Mr. Depp or  
23 was this just a stand-up discussion between the two  
24 of you?

25 A I remember it to be a stand-up discussion. 12:43

1 Q Do you have any recollection of sitting down  
2 and having a glass of wine with Mr. Depp that  
3 evening?

4 A No.

5 Q Do you drink wine?

12:43

6 A No.

7 Q Do you drink at all?

8 A Rarely.

9 Q Do you recall the words Mr. Depp used when  
10 he approached you as things were wrapping up?

12:43

11 A No.

12 Q Is it fair to say you don't remember the  
13 specific words he used, but the gist of it from your  
14 recollection was he offered an apology?

15 A Yeah, it was an apology.

12:44

16 Q Did he say anything to you during this  
17 discussion about whether or not he had physically  
18 struck you?

19 A I -- I do not believe that happened.

20 Q Did you -- what did you say to Mr. Depp when  
21 he offered the apology?

12:44

22 A I don't remember. I believe that we just --  
23 he apologized to me, some words were said, and then  
24 we kind of did that bro thing and that -- you know.

25 (The witness is indicating.)

12:44

1 Q And when you say we did that bro thing, what  
2 do you mean by that?

3 A You know, you shake hands and you go like  
4 that and that's it.

5 (The witness is indicating.)

12:44

6 Q So during this --

7 MS. ARMINAK: You don't know the bro thing?  
8 We're going to bro right now at the end of this  
9 depo.

10 MR. SMITH: And you gestured for us and I  
11 appreciate that, but actually our reporter can't  
12 take down what you did. Although our video can, but  
13 I'm not sure that's admissible.

12:44

14 BY MR. SMITH:

15 Q But regardless, I just want to understand  
16 exactly what happened between the two of you from  
17 what you're describing to me. So Mr. -- in your  
18 mind's eye, you recall Mr. Depp offering words that  
19 you took as an apology; correct?

12:45

20 A Yes.

12:45

21 Q And you can't recall one way or the other  
22 whether he said what he had done or not done to you;  
23 correct?

24 A Yes.

25 Q It's just -- you remember an apology; is

12:45

1 that right?

2 A Yes.

3 Q And then after the apology -- and you say  
4 some words were exchanged. Can you remember any of  
5 the words that were exchanged between the two of  
6 you?

12:45

7 A Just the apology.

8 Q And you say we did the bro thing. By that,  
9 you gave a gesture. Did you kind of shake hands  
10 with him?

12:45

11 A Yes.

12 Q Was it, like, a fist bump or something like  
13 that or describe for me how it was that you did the  
14 bro thing.

15 A It's the shake hand, and then you --

12:45

16 (The witness is indicating.)

17 A That's it.

18 MS. ARMINAK: Describe with your hands what  
19 you're doing.

20 THE WITNESS: So you shake hands, and then  
21 you go a half a hug sort of like a lighthearted tap,  
22 tap hug.

12:45

23 MR. SMITH: Okay.

24 BY MR. SMITH:

25 Q So you -- you and Mr. Depp joined hands on a

12:45

130



1 handshake --

2 A Yes.

3 Q -- and then you simultaneously kind of  
4 wrapped the other arm around each other?

5 A Yes. 12:46

6 Q And you gave each other effectively a hug;  
7 correct?

8 A A bro hug, yes.

9 Q And you call it a bro hug?

10 A Yeah. 12:46

11 Q Okay. How long did this interaction with  
12 Mr. Depp last?

13 A Not long.

14 Q Was anybody else present to witness this to  
15 your knowledge? 12:46

16 A There were people on the set clearing out.  
17 I don't know who was up there to see it.

18 Q Did you accept his apology?

19 A Yes.

20 Q Did you tell him that you had no hard  
21 feelings? 12:46

22 A I don't remember what I said to him.

23 Q Do you think you conveyed that sort of  
24 sentiment to him at this time?

25 A He apologized to me and we hugged it out, so 12:46

131

1 probably, yes.

2 Q Okay. So based on what you do remember  
3 about what the two of you did in this exchange, it's  
4 your best recollection that you would have conveyed  
5 to him somehow that you were accepting his apology;  
6 correct? 12:46

7 A Yes.

8 Q Do you remember taking a selfie with  
9 Mr. Depp at the time that he offered the apology?

10 A It was later in the evening. 12:47

11 Q And how much later in the evening was it you  
12 took a selfie with Mr. Depp?

13 MS. ARMINAK: Objection. Lacks foundation  
14 to the term selfie. Go ahead.

15 THE WITNESS: It actually wasn't a selfie,  
16 so -- someone took a picture. 12:47

17 MR. SMITH: Okay.

18 BY MR. SMITH:

19 Q So at some -- well, let me -- let me stick  
20 for the moment on this discussion -- 12:47

21 A Yes.

22 Q -- where he apologized and you accepted.  
23 Can you recall anything else that transpired between  
24 the two of you during that exchange?

25 A No. The apology happened, and I just wanted 12:47

132

1 it to be over with so I can go about my business.

2 Q Okay.

3 MR. SMITH: Move to strike everything after  
4 the word no as nonresponsive.

5 BY MR. SMITH:

12:47

6 Q And can you recall any of the words you  
7 conveyed to Mr. Depp at the time he offered the  
8 apology?

9 A No, I cannot.

10 Q Now, at some point after -- and this was in  
11 the lobby of the Barclay Hotel; is that right?

12:48

12 A No. This was on the second floor on the set  
13 of the Barclay Hotel where we just finished filming.

14 Q Have you told me everything you recall about  
15 that encounter with Mr. Depp?

12:48

16 A Yes.

17 Q Okay. At some point later that evening, did  
18 you again come into contact with Mr. Depp?

19 A Yes.

20 Q And when was that?

12:48

21 A That would be in the parking lot after we  
22 cleared the building.

23 Q And tell me what you recall about that  
24 encounter.

25 A We were just trying to get everybody out of

12:48

1 the parking lot. Depp was taking pictures with his  
2 fans who were waiting for him. Miguel thought it  
3 would be a good idea to take a picture.

4 Q So you and Miguel Gutierrez were present at  
5 this time? 12:49

6 A Uh-huh.

7 Q Is that a yes?

8 A Yes, yes.

9 Q And Mr. Depp was also present?

10 A Yes. 12:49

11 Q What did Mr. Gutierrez say to you about  
12 whether a picture ought to be taken?

13 MS. ARMINAK: Objection. Asked and  
14 answered. You can answer again.

15 THE WITNESS: I believe he asked Johnny if  
16 he would take a picture with me. 12:49

17 BY MR. SMITH:

18 Q And what did Mr. Depp say?

19 A He said yes.

20 Q And did Mr. Depp then allow Mr. Gutierrez to  
21 take a picture of you and Mr. Depp? 12:49

22 A Yes.

23 Q Do you have a copy of that picture in your  
24 possession, custody, or control?

25 A I'd have to look for it. I deleted it. 12:49

1 Q Did Mr. Gutierrez text a copy of that photo  
2 to you after he took it?

3 A I don't remember if he used my phone or his  
4 phone.

5 Q But was -- was the photo taken by 12:50  
6 Mr. Gutierrez --

7 A Yes.

8 Q -- on an i-type phone?

9 A Yes.

10 Q And you don't remember if it was your phone 12:50  
11 or his phone; correct?

12 A That's correct.

13 Q Have you looked on -- do you still own the  
14 same phone today that you had with you that evening?

15 A Probably not, no. Yeah. 12:50

16 Q Do you know what became of the phone that  
17 you had with you that evening?

18 A Yeah, it broke.

19 Q What did you do with it after it broke?

20 A I replaced it with a new phone. 12:50

21 Q When's the last time you've seen a copy of  
22 the picture of yourself and Mr. Depp that  
23 Mr. Gutierrez took?

24 A When I erased it off of Facebook.

25 Q And when was that? 12:50

1 A Right after I filed suit.

2 Q Why did you erase the photo right after you  
3 filed suit?

4 A Didn't seem like a good idea to be there.

5 Q And why do you think it was not a good idea 12:51  
6 for it not to be there?

7 A Common sense.

8 Q Did the photo remain on your Facebook page  
9 from at or about the day after the incident until  
10 the day you filed your lawsuit? 12:51

11 A Yes.

12 Q Were you and Mr. Depp both smiling in the  
13 photo?

14 A Yes.

15 Q Is this photo that you posted on your 12:51  
16 Facebook page that Mr. Gutierrez took, is that the  
17 only photo that you're aware of that was ever taken  
18 of yourself and Mr. Depp?

19 A Yes.

20 Q When's the last time you've seen that photo? 12:52

21 MS. ARMINAK: Objection. Asked and  
22 answered.

23 THE WITNESS: When I erased it.

24 BY MR. SMITH:

25 Q If you wanted to go about getting a copy of 12:52

1 A No.

2 Q Did you talk with any of Mr. Depp's security  
3 guards at any point in the evening of April 12th  
4 after the incident between yourself and Mr. Depp?

5 A I don't remember speaking to any of the 12:53  
6 security guards.

7 Q Do you know who Sean Bett is?

8 A I think he's one of his security guards.

9 Q Do you have any recollection to speaking  
10 with Sean Bett at any point about the incident 12:54  
11 between yourself and Mr. Depp?

12 A No.

13 Q Do you recall speaking to Mr. Bett at any  
14 point about any topic whatsoever?

15 A No. 12:54

16 Q Did you tell Mr. Depp at any point the  
17 evening of April 12th after the incident that you  
18 thought he had physically assaulted you?

19 A No.

20 Q Did you tell Mr. Depp at any point the 12:54  
21 evening of April 12th that he had done anything that  
22 hurt you?

23 A No.

24 Q Did you tell Mr. Depp at any point on the  
25 evening of April 12th that he had done anything that 12:54

1 caused you to take great offense?

2 A No.

3 Q Did you tell Mr. Depp at any point during  
4 the evening of April 12th that he'd done anything to  
5 cause you emotional trauma? 12:55

6 A No.

7 Q Did you ever tell Mr. Depp that you were  
8 traumatized by what he'd done?

9 A No.

10 Q Did you make any effort to reach out and 12:55  
11 contact Mr. Depp at any point prior to filing this  
12 lawsuit?

13 A No.

14 Q I want to back up in time now and pick up  
15 where we actually left off the first day of your 12:56  
16 deposition.

17 A Okay.

18 Q I was examining you in the first day of your  
19 deposition about an exchange that had occurred  
20 between yourself and a security guard from Gilmore 12:56  
21 Associates shortly before the incident with  
22 Mr. Depp. Do you recall my questions about that?

23 A Yes, I do.

24 Q And you agree with me -- or let me ask you.  
25 You agree with me that that exchange with the 12:56



1 Gilmore security guard was something that occurred  
2 in the range of 15 minutes before the encounter with  
3 Mr. Depp.

4 A Yes.

5 Q Now, I think -- well, let me -- did you flip 12:56  
6 off the security guard from Gilmore Associates at  
7 the time you were interacting with him?

8 MS. ARMINAK: Objection. Asked and  
9 answered.

10 THE WITNESS: Does that mean I shouldn't -- 12:57

11 MS. ARMINAK: No. Ignore my objection.

12 THE WITNESS: Yeah. Yes, I did.

13 BY MR. SMITH:

14 Q And by flip off, I mean you showed him your  
15 middle finger; correct? 12:57

16 A Yes.

17 Q Which is a -- a body language way of saying  
18 basically fuck you; correct?

19 A Uh-huh, yes.

20 Q Why did you do that? 12:57

21 MS. ARMINAK: Objection. Asked and  
22 answered. You can answer again.

23 THE WITNESS: Okay. So you want to --

24 MS. ARMINAK: Why did you do that? Answer  
25 the question. 12:57

1 THE WITNESS: So, again, the Tom Gilmore  
2 Associates and Richard Wynn who is the filming  
3 location he is on for Gilmore Associates, when you  
4 film in that area, they are very adamant about  
5 trying to receive money from productions whether  
6 it's deserved or not. 12:58

7 And, again, my job is to make sure that we  
8 don't pay Richard Wynn when it's not necessary. And  
9 so at this point, there was multiple extensions of  
10 the permit, and the last extension of the permit 12:58  
11 went over the time 10:00 p.m. on the street where he  
12 feels that he needs to be compensated for his  
13 buildings.

14 But we were not filming at his buildings.  
15 We were filming on the sidewalk in front of an old 12:58  
16 empty bank which they own, and they felt they needed  
17 to be compensated for.

18 My job as a location manager is to watch the  
19 money, and we were severely over budget and over  
20 schedule. And the \$2,500 extortion payment wasn't 12:58  
21 going to happen.

22 BY MR. SMITH:

23 Q Let me fast forward some of this out because  
24 I don't want to spend a lot of time on it.

25 A Right. 12:59

1 Q We've already covered it. Is it fair to  
2 summarize that Film LA eventually said go ahead and  
3 film without Gilmore signing off?

4 A Yes.

5 Q And then is it also fair to say that once 12:59  
6 that occurred, Gilmore had one of its personnel come  
7 on the set and start videotaping your production?

8 A Yes.

9 Q And that's what led to your encounter where  
10 you flipped off the security guard from Gilmore; 12:59  
11 correct?

12 A Yes.

13 Q I want to cover what lead up to you flipping  
14 him off. Describe to me the interaction you had  
15 with the security guard from Gilmore. Once he 12:59  
16 started filming, what was going on on the set?

17 MS. ARMINAK: Objection. Asked and  
18 answered.

19 THE WITNESS: I remember that I saw him  
20 filming. It was after 10:00 p.m., and I was nearby. 12:59  
21 And I had my back turned to him, and I flipped him  
22 the bird. But that was meant for Richard Wynn, not  
23 for the security guard.

24 BY MR. SMITH:

25 Q And by flipping the bird, you mean you 01:00

1 flipped him off.

2 A Yes.

3 Q And your recollection is you did that with  
4 your hand behind your back facing away from the  
5 security guard?

01:00

6 A Yes.

7 Q Was Mr. Gutierrez present with you at that  
8 time?

9 A I don't know.

10 Q Do you have any recollection one way or the  
11 other about Mr. Gutierrez's presence with you when  
12 you were interacting with the Gilmore security  
13 guard?

01:00

14 A He's always nearby, but I don't know if he  
15 was right there.

01:00

16 Q Besides flipping off the Gilmore security  
17 guard, did you have a verbal argument with him?

18 A I don't remember that.

19 Q How close did you get physically to the  
20 Gilmore security guard?

01:00

21 A I remember having my back turned towards  
22 him.

23 Q Did you ever get in the Gilmore Associates  
24 security guard's face during this interaction?

25 A I do not remember that.

01:01

1 Q Is it possible it happened but you don't  
2 remember?

3 A It's possible, but I do not remember.

4 Q Do you recall the security guard at some  
5 point in time actually filming you as the two of you 01:01  
6 interacted?

7 A No.

8 Q Do you recall Jason Gonet approaching you  
9 after you had this interaction with the security  
10 guard that you flipped off? 01:01

11 A Yes.

12 Q And do you recall he approached you to talk  
13 with you about the exchange you had with the  
14 security guard?

15 A Yes. 01:01

16 Q Do you recall Mr. Gonet expressing the  
17 sentiment to you that he thought you needed to calm  
18 down?

19 A I remember having a discussion with  
20 Mr. Gonet about the situation and to move away from 01:02  
21 the Gilmore security guard.

22 Q So you recall Mr. Gonet asking you to move  
23 away from the Gilmore security guard?

24 A Yes.

25 Q Did he explain to you why he was making that 01:02

1 request of you?

2 A No.

3 Q Do you recall him expressing words to the  
4 effect that he thought you needed to calm down?

5 A No.

01:02

6 Q Do you recall Mr. Gonet telling you anything  
7 like you needed to take a breather?

8 A No.

9 MS. ARMINAK: Objection. Asked and  
10 answered.

01:02

11 BY MR. SMITH:

12 Q Do you recall effectively Mr. Gonet asked  
13 you to leave the security guard alone?

14 MS. ARMINAK: Objection. Asked and  
15 answered.

01:02

16 THE WITNESS: Yes.

17 BY MR. SMITH:

18 Q And after Mr. Gonet intervened, you left the  
19 security guard alone; correct?

20 MS. ARMINAK: Object as to the word  
21 intervened. That lacks foundation. That misstates  
22 testimony.

01:02

23 MR. SMITH: You can answer.

24 THE WITNESS: Repeat the question, please.

25 ///

01:03

1 BY MR. SMITH:

2 Q After Mr. Gonet intervened, you then left  
3 the security guard alone; correct?

4 MS. ARMINAK: Same objection.

5 THE WITNESS: I walked away.

01:03

6 BY MR. SMITH:

7 Q And you walked away at the request of  
8 Mr. Gonet; correct?

9 A Yes.

10 Q Would you say that as you were walking away  
11 from this encounter with the security guard who you  
12 flipped off, that you were at least a little bit  
13 agitated?

01:03

14 A I can't say.

15 Q Do you typically flip off people you don't  
16 know if you're not agitated?

01:03

17 A No.

18 Q So would you agree based on your conduct  
19 that looking back in time, you probably were a  
20 little bit agitated by that point in time?

01:03

21 A No.

22 Q Did you know the security guard?

23 A No.

24 Q How much time would you estimate transpired  
25 between the time you flipped off the security guard

01:04

146

1 and then walked away at the request of Mr. Gonet and  
2 the exchange you had with Mr. Depp?

3 A It would have had to have been within  
4 15 minutes.

5 Q Do you recall between the interaction with 01:04  
6 the security guard and the interaction with Mr. Depp  
7 having any interaction with -- with any homeless  
8 individuals that were on the set?

9 A No.

10 Q Have you -- 01:04

11 A There were no homeless individuals on the  
12 set.

13 Q So it's your testimony, Mr. Brooks, that at  
14 the time of the incident between yourself and  
15 Mr. Depp, there were no homeless individuals in the 01:04  
16 area of the set?

17 A Yes.

18 Q And you're 100 percent certain of that?

19 A 100 percent certain.

20 Q What makes you 100 percent certain of that? 01:05

21 A It's a closed set.

22 Q And what does that mean for somebody who  
23 doesn't know your business?

24 A That means that anybody who is entering the  
25 area of our filming which is between -- on Fourth 01:05



1 neck surgeries.

2 MS. ARMINAK: He asked you when this  
3 accident occurred. Read it again and answer,  
4 please.

5 THE WITNESS: Well, there's been three. 01:11  
6 There's been two -- so do you want to know the very  
7 first -- I'm sorry. I'm confused.

8 MR. SMITH: No, don't apologize.

9 MS. ARMINAK: You can read back the  
10 question, how about that, so you can listen to it 01:11  
11 when it's read back.

12 THE WITNESS: Excluding recent period after  
13 the accident during which he recovered from multiple  
14 neck surgeries. So do you want to know after that  
15 accident or after my very first one? 01:11

16 MR. SMITH: Let's walk through your first,  
17 and then we'll get to that one.

18 THE WITNESS: Okay.

19 BY MR. SMITH:

20 Q How many accidents have you had? 01:11

21 A So I've been in two accidents.

22 Q Okay. Tell me about the first one.

23 A The first one I was rear-ended on the night  
24 of April 1st, 2011 riding home from work, last day  
25 of filming a Sony pilot. 01:11

1 Q Riding home on a motorcycle?

2 A No, no. Driving home in my car.

3 Q Did you suffer any injuries from that  
4 accident?

5 A Yes. 01:12

6 Q What sorts of injuries?

7 A Neck, wrist, back.

8 Q Did you have surgeries as a result of that  
9 accident?

10 A Eventually, yes. 01:12

11 Q And are you still suffering symptoms from  
12 the injuries you suffered in that accident?

13 A Yes.

14 Q What -- what symptoms are you suffering from  
15 today that you attribute to that accident? 01:12

16 A That is all related to my numbness in my  
17 feet, hands, my loss of balance, and the fire going  
18 down my right arm, and the pain in my neck.

19 Q Did you have spinal surgery as a result of  
20 that accident? 01:12

21 A Yes. I had a cervical laminectomy.

22 Q And --

23 A But that was roughly five years -- four and  
24 a half years later.

25 Q And when did you have the cervical 01:12

153

1 laminectomy?

2 A In August 2000 -- excuse me --  
3 September 2015.

4 Q And what is a cervical laminectomy in  
5 layman's terms? 01:13

6 A That is where you -- this is your nerve  
7 passage way, and this is your -- this is your nerve,  
8 and this is your nerve passage way.

9 (The witness is indicating.)

10 A Well, this is what it looks like when it's 01:13  
11 normal, and this is what it looks like when it's  
12 pinched.

13 (The witness is indicating.)

14 A It's like degenerative stenosis, and it  
15 narrows and is completely pinched off to where I 01:13  
16 couldn't feel my body --

17 Q So --

18 A -- or barely walk.

19 Q So in layman's terms, the inside of your  
20 spinal column pinched on the nerves and caused 01:13  
21 the --

22 A Completely shut it off. I was very close to  
23 being paralyzed.

24 Q Okay. Did you have another accident after  
25 the April 1, 2011 accident? 01:13

1 A In November of 2017.

2 Q Tell me about that accident.

3 A I was driving to meet a producer for my next  
4 job, commercial, and a lady downtown ran a light,  
5 turned left in front of me, and I T-boned her.

01:14

6 Q Did you sustain injuries in that accident?

7 A I did.

8 Q What sorts of injury?

9 A Again, neck, back, wrist. Reinjuring  
10 everything.

01:14

11 Q This was in November 2017?

12 A Yes.

13 Q So that would have been several months --  
14 roughly six months after the incident on the set of  
15 City of Lies was the second accident you had?

01:15

16 A Yes.

17 Q And did you aggravate your spinal injuries  
18 that you had from the original accident during the  
19 second accident?

20 A Yes.

01:15

21 Q So did your pain and -- and spinal-related  
22 issues become worse as a result of the second  
23 accident?

24 A They returned.

25 Q Okay. And did you ultimately have a surgery

01:15

1 Q Were you hospitalized after that  
2 November 2017 accident?

3 A I was not hospitalized, but I went to seek  
4 immediate care.

5 Q How long were you under medical care 01:17  
6 following the November 2017 accident?

7 A I was on medical care continuously through  
8 May.

9 Q So from November 2017 through May of 2018;  
10 is that right? 01:17

11 A Uh-huh.

12 Q And you were under continuous medical care  
13 for your spinal condition caused by this accident  
14 during that period?

15 A Yes. 01:17

16 Q Were you able to work during that period?

17 A No.

18 Q And in the interrogatory response, were you  
19 referring to a recent period where you were  
20 recovering from multiple neck surgeries? Were you 01:17  
21 referring to the period of November of 2017 through  
22 May of 2018?

23 A I have to check because at the time if I'm  
24 recovering from multiple neck surgeries, that would  
25 be right after my second surgery. So -- 01:18

1 Q So that would have been August of 2016;  
2 correct?

3 A Yes.

4 Q Just so I'm clear on this, the response  
5 refers to multiple neck surgeries. Did you have  
6 more than two neck surgeries?

01:18

7 A No.

8 Q So is it fair to say that between  
9 November of 2017 and May of 2018, even if you had  
10 wanted to, you couldn't have worked during that  
11 period?

01:18

12 A I could have worked.

13 Q Did you make any effort to work during that  
14 period?

15 A Yes.

01:18

16 Q What efforts did you make during that  
17 period?

18 A I was sent a script by a previous producer.

19 Q And were you hired on that project?

20 A I was sent a script for Netflix by Bruce  
21 Wayne Gillies who is actually the line producer of  
22 Labyrinth.

01:19

23 Q And you weren't hired on that project  
24 ultimately; correct?

25 A Ultimately, I was not hired.

01:19

1 Q Okay. Were you actively seeking out work  
2 opportunities after the November 2017 accident and  
3 before May of 2018?

4 A I was looking for work while I was on --  
5 recovering from disability doing my physical therapy  
6 getting ready to go back to work. 01:19

7 Q Okay. At some point, did your doctor or  
8 team of doctors clear you to return to work  
9 activities after November of 2017?

10 A Yes, they cleared me to go back to work 01:19  
11 sometime in -- in May.

12 Q May of 2018?

13 A Uh-huh.

14 Q Is that a yes?

15 A Yes. 01:20

16 Q And so prior to May -- between November of  
17 2017 and May of 2018, were you under doctor's orders  
18 that you should not be going back to work?

19 A No. I was under doctor's treatment.

20 Q Did your doctors tell you they didn't 01:20  
21 recommend you return to work between November of  
22 2017 and May of 2018?

23 A No.

24 Q When you -- when you say you were cleared to  
25 return to work in May of 2018, was there some 01:20

1   impediment to your returning to work based on  
2   medical conditions prior to that clearance?

3       A    I was still in pain but would have been able  
4   to continue.  I would have gone to work if there was  
5   a job available because it is more important to work  
6   to support my family.  I've worked in pain before.

01:20

7       Q    Did you seek out other job opportunities  
8   between November of 2017 and May of 2018 other than  
9   the one with Mr. Gillies that you've already told me  
10  about?

01:21

11       A    I was sent a script for the Tax Collector,  
12  another movie that I did not get.

13       Q    Who sent you the script for Tax Collector?

14       A    Dan Katzman.

15       Q    Let me back up a minute on the  
16  returning-to-work issues.  From the day after --  
17  let's pick April 13th, the day after the incident,  
18  2017.  Do you have that date in mind?

01:21

19       A    I'm sorry.  Say that again.

20       Q    Sure.  I just want to focus you on a  
21  timeline.

01:21

22       A    Right.

23       Q    So my focus now is from April 13, 2017  
24  forward.

25       A    Uh-huh.

01:22



1 Q Do you have that timeline in mind?

2 A Yes. Okay.

3 Q That would be the day after the incident  
4 with Mr. Depp --

5 A That's true --

01:22

6 THE REPORTER: One second.

7 BY MR. SMITH:

8 Q Focusing on that time period, would you  
9 agree with me that during that entire time period,  
10 you have been physically and mentally able to  
11 perform work if work's available for you to perform?

01:22

12 A Yes.

13 Q That there's been no impediment to your  
14 working from any injuries you suffered from anything  
15 Mr. Depp did to you that would prevent you from  
16 working in that period. Would you agree with that?

01:22

17 A That's correct.

18 Q And so the only impediment to your working  
19 that you attribute to Mr. Depp has to do with the  
20 fact that various employment opportunities  
21 ultimately didn't pan out for you; correct?

01:22

22 A Yes.

23 Q And that may or may not be because you've  
24 been blackballed or that the potential employers  
25 otherwise don't want to touch you because of the

01:22

161

1 publicity on this case; correct?

2 A (Inaudible response.)

3 MS. ARMINAK: Well, objection. Calls for  
4 speculation. Lacks foundation.

5 THE REPORTER: I didn't get your response.

01:23

6 THE WITNESS: I don't see it that way.

7 BY MR. SMITH:

8 Q And how do you see it?

9 A I see it that I'm not getting work because  
10 of the incident.

01:23

11 Q Okay. But you agree, however, that from  
12 April 13, 2017 forward, if work was available, you  
13 were physically and emotionally able to do it;  
14 correct?

15 A And I did.

01:23

16 Q Okay. So no physical or emotional injuries  
17 that you suffered prevented you from working from  
18 April 13, 2017 forward; correct?

19 A Yes.

20 Q So to the extent there's been some  
21 impediment to your working after April 13, 2017, it  
22 has something to do with something besides any  
23 injuries you suffered from this incident with  
24 Mr. Depp; correct?

01:23

25 A Repeat the question, please.

01:23

1 Q Okay. Would you agree that to the extent  
2 you've been unable to get work from April 13, 2017  
3 moving forward, that that inability has nothing to  
4 do with any injuries you suffered based on this  
5 incident with Mr. Depp?

01:24

6 MS. ARMINAK: Objection. Vague and  
7 ambiguous. Lacks foundation. Calls for  
8 speculation.

9 THE WITNESS: I believe my lack of work is  
10 directly related to the incident.

01:24

11 MR. SMITH: I want to distinguish the  
12 incident from your injuries, and we'll take it one  
13 step at a time.

14 THE WITNESS: Okay.

15 BY MR. SMITH:

01:24

16 Q Are there any physical injuries you  
17 attribute to the incident that have prevented you  
18 from performing your work functions since April 13,  
19 2017?

20 A No.

01:24

21 Q Are there any emotional injuries you  
22 attribute to the incident that have prevented you  
23 from performing your work functions at any point  
24 from April 13, 2017 forward?

25 A Forward to now or forward to --

01:24

1 perception was you had no difficulty finding work  
2 opportunities up through your November 2017 car  
3 accident?

4 MS. ARMINAK: Objection. Misstates  
5 testimony. 01:40

6 THE WITNESS: I was working. I had jobs. I  
7 did some jobs.

8 BY MR. SMITH:

9 Q Were there any jobs that you sought in that  
10 period rejected or turned down because anybody told 01:40  
11 you it related to the incident with Mr. Depp?

12 A Not yet.

13 Q When's the first time you can ever recall  
14 hearing from any source that any job opportunity you  
15 didn't get was in any way tied to the incident? 01:40

16 A After I came back from disability in 2018.

17 Q So that would have been in May 2018?

18 A Yes.

19 Q And what's the first time you can recall  
20 hearing any source say that there was an issue with 01:41  
21 the incident that impacted your employability?

22 A Russell Bertolino who is a Teamster Local  
23 399 transportation coordinator tried to get me on  
24 one of his shows, and he was told that I've been  
25 blacklisted by Depp. 01:41

1 A Yes.

2 Q So would you agree the first time you had  
3 any difficulty in securing employment opportunities  
4 tied in any way to the incident came after the  
5 incident got publicized in the New York Post?

01:42

6 A Yes.

7 Q Do you have any reason to testify that  
8 Mr. Depp did anything to cause the New York Post to  
9 publish that article in May of 2018?

10 A No.

01:43

11 Q Do you have any reason to believe that  
12 Mr. Depp made any effort to publicize anything about  
13 the incident that happened between himself and you  
14 on April 12, 2017?

15 A No.

01:43

16 Q Putting aside Mr. Bertolino, I want to focus  
17 on potential employers. Has any potential employer  
18 that you've sought work from ever told you directly  
19 that Mr. Depp had blackballed you?

20 A No.

01:43

21 Q And has any potential employer ever told you  
22 they were not willing to hire you because of  
23 anything having to do with the incident?

24 A Yes.

25 Q And who told you that?

01:44

172

1 A Well, Russell Bertolino.

2 Q He wasn't your employer; correct?

3 A That's correct.

4 Q And I want to -- I want to be clear what I'm  
5 asking you. I understand Mr. Bertolino said some  
6 things to you --

01:44

7 A Yes.

8 Q -- as did Mr. Gillies.

9 A Yes.

10 Q I want to focus on what you personally have  
11 communicated from or to with potential employers;  
12 okay? Do you have that in mind?

01:44

13 A Yes.

14 Q Have you ever yourself had any potential  
15 employer tell you one way or the other whether the  
16 incident had anything to do with your employability?

01:44

17 A Nobody will tell me that.

18 Q And has any potential employer ever told you  
19 through today that your employability has been  
20 negatively impacted by anything that Johnny Depp has  
21 done or said?

01:44

22 A No one has told me that.

23 Q Would you agree with me that the source of  
24 your belief about your employment difficulties  
25 ultimately is based on what Mr. Bertolino and

01:45

173

1 Mr. Gillies have shared with you?

2 A Yes.

3 Q Are there any other persons besides  
4 Mr. Bertolino or Mr. Gillies that have said things  
5 to you that caused you to believe you've become  
6 unemployable due to the incident?

01:45

7 A Yes.

8 Q Who else?

9 A An associate named Cecil Gentry.

10 Q What -- when you say an associate, where is  
11 Mr. Gentry an associate?

01:45

12 A He's a production designer.

13 Q And what has Mr. Gentry told you anything  
14 about your employability and the incident?

15 A He has hired -- tried to hire me twice on  
16 shows that he has been involved in. Production  
17 designers are generally responsible for the location  
18 department. They were Blumhouse Productions.

01:45

19 The first one was a Hulu show, Into the  
20 Dark, where he wanted me to come in and do the show,  
21 and that was met with nos.

01:46

22 Q And the nos that was met with, did any  
23 source say that nos were --

24 A (Unintelligible.)

25 (Simultaneous speaking. Not reportable.)

01:46

174

1 THE REPORTER: Sorry. One second.

2 MS. ARMINAK: Excuse me.

3 THE WITNESS: Sorry.

4 MS. ARMINAK: Don't talk over him.

5 THE WITNESS: Sorry. 01:46

6 MS. ARMINAK: When he's asking a question,  
7 you need to finish until the end.

8 THE WITNESS: I'm sorry.

9 MS. ARMINAK: Excuse me. You need to wait  
10 until the end of the question. 01:46

11 THE WITNESS: I apologize.

12 MR. SMITH: Don't apologize. It's natural.

13 BY MR. SMITH:

14 Q Did he share with you what any other person  
15 said to him about why the answer had come back no? 01:46

16 A He told me because it was of the incident.

17 Q Did he tell you what caused him to come to  
18 that belief?

19 A The producer told him.

20 Q Did he say who that producer was? 01:47

21 A He would not tell me.

22 Q Did he say what exactly the producer had  
23 said to him?

24 A He said that I'm not hireable right now.

25 Q Did he say the producers said you were not 01:47



1 Q And who's the Chris you reference there?

2 A Chris and Miguel Gutierrez. They're  
3 brothers.

4 Q And Chris Gutierrez is a good friend of  
5 yours; correct? 01:50

6 A Chris Gutierrez is a friend of mine.

7 Q And is Miguel Gutierrez also a friend of  
8 yours?

9 A He's a work friend.

10 Q Miguel Gutierrez has stayed at your house on 01:51  
11 numerous occasions; correct?

12 A Miguel has stayed at my house when we have  
13 work on the west side. He stays on the east side,  
14 so he stays at my house when there's an early call  
15 for whenever he needs to go so that he doesn't have 01:51  
16 to fight traffic and save an hour.

17 Q And that's happened on numerous occasions;  
18 correct?

19 A Yes.

20 Q Would you say he's a welcomed house guest at 01:51  
21 your house?

22 A Absolutely.

23 Q In fact, you were the one responsible for  
24 first getting Miguel Gutierrez his union card;  
25 correct? 01:51

1 Q And are all the jobs listed on Exhibit 36  
2 union jobs?

3 A Yes, they are.

4 Q And how do you go about getting this report?

5 A I print it off my motion picture -- MPI -- 01:53  
6 MPIHP page.

7 Q Let me start at the first page in, the most  
8 recent productions. You see it starts from date,  
9 and it's got an entry of 1/21/2019? Do you see  
10 that? 01:53

11 A Oh, it's on this page.  
12 (The witness is reviewing the  
13 document.)

14 Q Do you see that entry there?

15 A I see, yeah, 1/21, yes. 01:53

16 Q Is -- is that the last union job you have  
17 had?

18 A Yes.

19 Q And does this report capture all the union  
20 jobs you had prior to that date dating back to 2006? 01:54

21 A Yes.

22 Q On the year below if you continue down this  
23 first page, if you look, you'll see it's got a  
24 December 25, 2018 date near the top. And if you  
25 scroll on down, you'll see it runs chronologically 01:54

1 A Yes.

2 Q So were you employed at any point between  
3 10/8/17 and 9/30/2018?

4 (The witness is reviewing the  
5 document.)

01:56

6 A Oh, right. That was -- okay. So that's  
7 where the accident happened. That was my last  
8 commercial before my accident on November 17th.

9 Q Was it November 17th, 2017?

10 A Yes. That was when the car crash happened.

01:57

11 Q And so the lack of employment between  
12 10/8 -- or -- the lack of employment from 11/17/17  
13 until 9/30/2018 was due to the accident that you  
14 suffered; is that right?

15 A Yes.

01:57

16 Q Okay. Now I want to work further back in  
17 time. Let's look at the entry -- one, two, three --  
18 six or seven up from the bottom of the page, it's  
19 got the last Good Film Productions U.S. entry. Do  
20 you see that?

01:58

21 A Yes.

22 Q And that's the City of Lies or Labyrinth  
23 production where the incident between yourself and  
24 Mr. Depp occurred; correct?

25 A Yes.

01:58

1 Q And so does this report then reflect that  
2 roughly two months after that incident on the City  
3 of Lies set, you got employed on the Starz Pour Vida  
4 Productions; is that right?

5 A Yes. 01:58

6 Q And you held that job for --

7 A It's a three-week shoot.

8 Q Okay. And then you've got a gap between the  
9 middle of July and early September, and then you  
10 picked up another job; correct? 01:58

11 A Correct.

12 Q That was the Homeward Bound Productions,  
13 Inc. job; is that right?

14 A Yes, it was.

15 Q And then after that, you had a slight gap,  
16 and then you picked up a job in October on the  
17 Corporate Management Solutions matter; correct? 01:58

18 A Yes.

19 Q So would you agree with me that during the  
20 period that you were working on the Starz Por Vida  
21 all the way through Corporate Management Solutions,  
22 that you were able to find work and perform the work  
23 if it was available? 01:59

24 A Yes.

25 Q So from your experience, you didn't have any 01:59

1 issues getting jobs because of the incident in that  
2 time period; correct?

3 A Yes.

4 Q The -- the problems arose some point later  
5 in time; correct? 01:59

6 A Yes. However, I was always questioned about  
7 it.

8 Q But questioned or not, you were able to get  
9 the jobs you wanted, at least through the Corporate  
10 Management Solutions job that you took in  
11 November of 2017; correct? 01:59

12 A Yes.

13 Q And then right about that time, you had your  
14 car accident in November of 2017; correct?

15 A Yes. 01:59

16 Q And you were laid up for an extended period  
17 of time due to that accident; correct?

18 A Yes.

19 Q Let's -- let's work our way backwards. If  
20 we go to the next page, it's got 2016 entries on it. 01:59  
21 Do you see the MODOP Films, LLC entry?

22 A I haven't got there yet.

23 (The witness is reviewing the  
24 document.)

25 Q If you go down the date column -- 02:00

1 workload through today?

2 A Through 20 -- when I got back off of  
3 disability for Good Films, I was working and ready  
4 to go. I'm ready to go.

5 Q When you say when you got back off of 02:27  
6 disability for Good Films, do you mean the -- May of  
7 2018?

8 A No. I mean February 2017.

9 Q Okay. Were you on disability prior to  
10 February of 2017? 02:27

11 (The witness is reviewing the  
12 document.)

13 A I was on disability from November of 2017.

14 Q To when?

15 A Until July of 2018. 02:28

16 Q And were you actually drawing state  
17 disability payments during that period?

18 A Yes.

19 Q And in July 2018, did you then get a medical  
20 clearance to return to work? 02:28

21 A Yes, but I was available to return to work  
22 previously before that.

23 Q Whether available or not, you continued to  
24 draw disability payments from the state through  
25 July of 2018; correct? 02:28

1 A Yes.

2 Q Now, you've claimed that you've suffered  
3 emotional injuries as a result of the incident with  
4 Mr. Depp. I'd like to ask you can you describe for  
5 me what emotional injuries you have suffered. 02:29

6 A I have lost my confidence in myself, I am  
7 unsure about my abilities to continue doing my job  
8 with strangers, I've become depressed, withdrawn.

9 Q Anything else?

10 A Distraught. 02:29

11 Q When did --

12 A Distant.

13 Q I didn't mean to interrupt you. Go ahead.

14 A Distraught, distant.

15 Q When -- when did you first begin to  
16 experience any of those symptoms after the incident? 02:30

17 A The first bit of being bothered by it was  
18 the constant barrage of everybody who knew me or  
19 found out who I was asking me about the incident.

20 Q And when did that begin? 02:30

21 A It started right after the original  
22 incident, and then it kind of stayed at an  
23 even-keeled pace. And then once the May 8th New  
24 York Post story came out, it became really  
25 emotionally difficult for me because I did not want 02:30

1 any publicity.

2 Q What sort of emotional difficulties were you  
3 experiencing prior to the New York Post article in  
4 May 2018?

5 A Normal stress of life.

02:31

6 Q So you have -- did you have any additional  
7 emotional trauma or injuries that you attributed to  
8 the incident that manifested themselves at any point  
9 before May of 2018?

10 A I was definitely depressed about the  
11 incident, but I moved on. You know, I'm a masculine  
12 male, and I'm -- you know, it's your job to shrug  
13 things off and move on and do your job.

02:31

14 So I continue to try to, you know, move on,  
15 get jobs, move forward, work in the industry. I've  
16 got a few more years until my retirement. Just  
17 taking care of my family, working, and what's  
18 physically better. It's time to work.

02:31

19 Q So prior to May of 2018, would you agree you  
20 essentially carried on business as usual?

02:32

21 A I was carrying on business as usual, but I  
22 was carrying the emotional baggage of the incident  
23 with me.

24 Q But you were able to carry that and perform  
25 your work functions; correct?

02:32

195



1 A Yes.

2 Q And that remained the case at least through  
3 May of 2018; correct?

4 A Correct.

5 Q And did that situation at some point change  
6 or -- let me ask a different question. At some  
7 point, did your emotional trauma become more severe?

02:32

8 A Yes.

9 Q And was that after the New York Post  
10 article?

02:32

11 A It started becoming more -- more so than.

12 Q And what happened in your life that caused  
13 your emotional trauma to worsen at or about that  
14 time?

15 A The barrage of phone calls, e-mails, texts  
16 from people all over the country that I knew,  
17 friends, work associates, you know, school people.  
18 Hey, is this you? Did this happen? What happened?

02:33

19 Got an e-mail from Thailand from a producer  
20 saying hey, is this my Rocky? You know, just all  
21 over the world. It was world news.

02:33

22 Q And did the fact that it would get published  
23 worldwide cause you to suffer emotional trauma?

24 A Huge, huge embarrassment.

25 Q And what about that caused you to suffer

02:33

1 emotional trauma?

2 A Well, I didn't want this to come out. I  
3 walked away from the incident, and now here it is,  
4 like, the top news story.

5 Q When you say you walked away from the 02:34  
6 incident, what do you mean by that?

7 A That means that after the incident, I'd  
8 walked away. The -- two days after the incident, I  
9 received a call from a reporter from the Hollywood  
10 Reporter. 02:34

11 Her name was Anita Bush, and she called me  
12 saying that she heard about the incident and wanted  
13 to do a story about abuse on Hollywood sets between  
14 higher-ups and crew members.

15 And I just told her that I'm not that 02:34  
16 person, I don't want any spotlight from it, I want  
17 to walk away from it, I've got a few more years  
18 until retirement, I just want to work. I just want  
19 to work, and this would be bad.

20 Q So when you said you walked away from the 02:34  
21 incident, what you meant was you didn't want to  
22 engage with that reporter?

23 A I didn't want to engage with any reporters.  
24 Yes, did not want to engage with any reporters.

25 Q Now, at some point, your intentions changed 02:35

1 public. And when it did become out in public, it  
2 embarrassed me, and it just brought back childhood  
3 stuff which is very distressful.

4 Q Are there any specific people that you can  
5 identify today that encouraged you to pursue  
6 litigation against Mr. Depp? And I'll exclude your  
7 wife and your counsel from that list.

02:38

8 A I would have to think about it. Various  
9 members of the location community, the production  
10 community.

02:38

11 Q Now, you were seeking help from Terre  
12 Bridgham well before the incident occurred; correct?

13 A Correct.

14 Q What -- when did you first seek out help  
15 from Ms. Bridgham?

02:39

16 A 2014 or '15.

17 Q And why did you first start seeing  
18 Ms. Bridgham?

19 A I was having anxiety attacks, and it was  
20 related to my childhood.

02:39

21 Q What sort of anxiety attacks were you having  
22 that caused you to seek out help from Ms. Bridgham?

23 A I was having panic attacks and I spoke to a  
24 friend about it and he suggested I go see Terre.

25 Q I'll show you what we're going to have our

02:39

200

1           A    A period of therapy and we went through it  
2           and she gave me the exercises and I started doing  
3           better and had stopped seeing her.

4           Q    Are you currently experiencing any of the  
5           symptoms that -- where you checked boxes here on  
6           this form when you first visited Ms. Bridgham?

02:45

7           A    I'm sorry?

8           Q    I want to focus --

9           A    Yeah.

10          Q    -- today.

02:45

11          A    Right.

12          Q    Are any of the boxes that you checked back  
13          when you first visited Ms. Bridgham, are any of the  
14          matters you checked there matters where you're now  
15          again having symptoms?

02:45

16          A    No. I'm looking for that page.

17                (The witness is reviewing the  
18                document.)

19          A    Yes.

20          Q    And which ones?

02:45

21          A    Sadness and crying spells, socially  
22          isolated. I've added -- you can add appetite and  
23          weight loss, insomnia, difficulty having fun,  
24          nervousness and jittery, excessive worrying, and  
25          definitely easily distracted.

02:46

206

1 Q And fidgety?

2 A Yes.

3 Q You skipped over irritable and temper  
4 outburst. Are you having issues with that?

5 A Not particularly.

02:46

6 MS. ARMINAK: Your lawyer is.

7 THE WITNESS: Well, I'm glad I'm contagious.

8 BY MR. SMITH:

9 Q If you move back in the packet here another  
10 two pages, you see there's a signature -- client's  
11 name and a signature line. Do you see that?

02:46

12 A Uh-huh, yes, I do.

13 Q And is that your signature there on the  
14 signature line?

15 A Yes, it is.

02:46

16 Q And does this show you filled this form out  
17 on August 13, 2014?

18 A Yes, it does.

19 Q How long after the incident with Mr. Depp  
20 was it you first began experiencing any of these  
21 symptoms that you just told me you are currently  
22 experiencing?

02:47

23 (The witness is reviewing the  
24 document.)

25 A I -- I would say these experiences, again,

02:47

207

1 started coming out after the New York Post. They  
2 were always -- they were there. They were dormant  
3 probably. But once the post article came out, I  
4 started feeling them again.

5 Q So in terms of the timeline as you sit here 02:47  
6 today, your recollection would be these symptoms  
7 that you just described for me on the form here,  
8 they began to manifest themselves mainly after the  
9 New York Post article got published?

10 A Yes. 02:48

11 MS. ARMINAK: Objection. Misstates  
12 testimony.

13 BY MR. SMITH:

14 Q And how long after that article got  
15 published was it that you reached out and sought any 02:48  
16 treatment from Terre Bridgham?

17 A I don't remember.

18 Q If you look at the third page of  
19 Ms. Bridgham's file --

20 A Okay. Yes. 02:48

21 Q -- we can ask her these questions as well,  
22 but it looks if you go to the bottom of that page,  
23 that the last visit reflected in her notes before  
24 the incident would have been July 29, 2015, and the  
25 next visit appears to show on September 26, 2018. 02:49

208

1 Q And has her -- has your -- have your visits  
2 with her in the past few weeks helped with any of  
3 your symptoms?

4 A She has given me a hypnosis exercise, and it  
5 seems to have helped a little bit. 02:58

6 Q Okay. Is there a name for that exercise?

7 A It's -- it's hypnosis of a tape.

8 Q Has Ms. Bridgham indicated what her  
9 recommended future course of treatment is for you?

10 A To keep seeing her. 02:59

11 Q Has she indicated to you how long she thinks  
12 she'll need you to continue to see her to resolve  
13 your emotional complaints that you attribute to this  
14 incident?

15 A No. 02:59

16 Q Do you have any idea as you sit here today  
17 how long you think you'll need to seek assistance  
18 from Ms. Bridgham relating to the emotional trauma  
19 you're claiming in this case?

20 A I plan on seeing her for a little bit of  
21 time. 02:59

22 Q Okay. Can you refine that for us in any  
23 more detail at this point in time?

24 A Until I am feeling better.

25 Q And Ms. Bridgham hasn't given you any sort 02:59

216

1 of prediction or game plan on how long she thinks  
2 that's going to take; correct?

3 A She did not, no.

4 Q Has Ms. Bridgham recommended you seek any  
5 sort of treatment for your emotional injuries from  
6 any other professionals?

02:59

7 A No.

8 Q We previously marked in this case as  
9 Exhibit 12 your responses to form interrogatories  
10 set one. Let me -- with counsel's permission, I'm  
11 going to show you my binder. It's not the official  
12 the court reporter one, but it's a clean version of  
13 that exhibit.

03:01

14 (Whereupon Exhibit 12 was  
15 referenced.)

03:01

16 MS. ARMINAK: Okay.

17 BY MR. SMITH:

18 Q So I put Exhibit 12 in front of you,  
19 Mr. Brooks. Can you take a look, if you would, at  
20 the answer to interrogatory 8.7. It's on page  
21 number five.

03:01

22 (The witness is reviewing the  
23 document.)

24 A Yes.

25 Q And that says -- and I'll -- you can look

03:01

217



1 MR. SMITH: I'm just trying -- let me try it  
2 a different way.

3 BY MR. SMITH:

4 Q We know you saw her on September 26, 2018;  
5 correct? 03:16

6 A Yes.

7 Q And you told me that even though it's not on  
8 her records here, you have a recollection of seeing  
9 her in 2017; correct?

10 A Yes. 03:17

11 Q Did she charge you a fee for the 2017 visit?

12 A I believe she did.

13 Q Do you know what the fee was at that time?

14 A It would have been \$150 or \$175.

15 Q Okay. And -- 03:17

16 A I don't know. It might have -- I don't  
17 know. I don't know.

18 Q And then you -- you testified that since  
19 September 26, 2018, in the past few weeks, you've  
20 seen her two more times; correct? 03:17

21 A Yes.

22 Q So to recap, is it your best recollection as  
23 you sit here today that you've seen Ms. Bridgham a  
24 total of four times since the incident on City of  
25 Lies? 03:17

224

1 A Yes.

2 Q And if we round her charges up to \$200 per  
3 each of those times, would you agree with me that  
4 you've incurred a total of \$800 in cost to be  
5 treated by Ms. Bridgham since the City of Lies  
6 incident?

03:17

7 A Yes.

8 Q Do you have any other out-of-pocket expenses  
9 you've incurred for anything --

10 A No.

03:18

11 Q I need to finish. I appreciate the quick  
12 answer, but let me finish my question.

13 A Sorry.

14 Q Do you have any other out-of-pocket expenses  
15 you've incurred for any reason that you attribute to  
16 the incident besides the \$800 you have paid to  
17 Ms. Bridgham?

03:18

18 A Lawyers' fees.

19 Q Exclude --

20 MS. ARMINAK: Excuse me. Please exclude any  
21 type of --

03:18

22 THE WITNESS: All right.

23 MS. ARMINAK: -- attorney-client  
24 communication information.

25 THE WITNESS: No. There's no --

03:18

225

1 MR. SMITH: Okay.

2 BY MR. SMITH:

3 Q So putting aside lawyer fees or cost of  
4 litigation in this case, would you agree with me  
5 that the -- that your total out-of-pocket expenses  
6 that you attribute to the incident as of today are  
7 \$800 or less?

03:18

8 A Yes.

9 MR. SMITH: I have no further questions of  
10 the witness.

03:18

11 MS. ARMINAK: Okay.

12 MR. SMITH: Assuming you have none.

13 MS. ARMINAK: No.

14 MR. SMITH: Why don't we offer a stipulation  
15 that the reporter be relieved of her custodial  
16 duties under CCP. That the original of the  
17 transcript will be sent to --

03:18

18 MS. ARMINAK: Please don't take that off.  
19 Put that back on.

20 MR. SMITH: -- plaintiff's counsel's office  
21 here at Baker Olson. That the witness will review  
22 and sign the transcript under penalty of perjury.

03:19

23 That he'll have 14 days from the date that  
24 counsel receives the transcript from the reporter to  
25 review it, sign it, and make any changes. That

03:19

226

1 REPORTER'S CERTIFICATION

2  
3 I, KIEU PHAM, a Certified Shorthand  
4 Reporter, in and for the State of California, do  
5 hereby certify:

6 That the foregoing witness was by me duly  
7 sworn; that the deposition was then taken before me  
8 at the time and place herein set forth; that the  
9 testimony and proceedings were reported  
10 stenographically by me and later transcribed into  
11 typewriting under my direction; that the foregoing  
12 is a true record of the testimony and proceedings  
13 taken at that time.

14  
15  
16 IN WITNESS WHEREOF, I have subscribed my  
17 name this 26th day of September, 2019.

18  
19 

20  
21 \_\_\_\_\_  
Kieu Pham, CSR NO. 13667

22  
23 (The foregoing certification of this transcript does  
24 not apply to any reproduction of the same by any  
25 means, unless under the direct control and/or  
supervision of the certifying reporter.)

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DEPOSITION ERRATA SHEET

Assignment No. 48446

Case Caption: Brooks v. Depp, et al.

DECLARATION UNDER PENALTY OF PERJURY

I declare under penalty of perjury that I have read the entire transcript of my Deposition taken in the above captioned matter or the same has been read to me, and the same is true and accurate, save and except for changes and/or corrections, if any, as indicated by me on the DEPOSITION ERRATA SHEET hereof, with the understanding that I offer these changes as if still under oath.

Signed on the \_\_\_\_\_ day of \_\_\_\_\_,  
20\_\_\_\_.

\_\_\_\_\_

GREGG "ROCKY" BROOKS