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Transcript of Amber Laura Heard - Day 1

Date: January 12, 2022
Case: Depp, II -v- Heard

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VIRGINIA

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

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JOHN C. DEPP, II, :
Plaintiff and :
Counter-Defendant, : Civil Action No.
v. : CL-2019-0002911
AMBER LAURA HEARD, : Volume 1
Defendant and :
Counter-Plaintiff. :

----- x

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Videotaped Deposition of AMBER LAURA HEARD

Irvine, California

Wednesday, January 12, 2022

9:42 a.m. PST

Job No.: 421206

Pages: 1 - 341

Reported By: Rhonda Norberg, RPR

CSR No. 9265, CCRR No. 185

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Transcript of Amber Laura Heard - Day 1

Conducted on January 12, 2022

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1 CONFIDENTIAL Videotaped Deposition of
2 AMBER LAURA HEARD, held at 2211 Michelson Drive, Seventh
3 Floor, Irvine, California 92612.

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 Pursuant to notice, before Rhonda Norberg,
Certified Shorthand Reporter No. 9265, CCRR No. 185
in and for the State of California.

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A P P E A R A N C E S

ON BEHALF OF THE PLAINTIFF AND COUNTER-DEFENDANT:

BENJAMIN G. CHEW, ESQUIRE

LEO PRESIADO, ESQUIRE

CAMILLE VASQUEZ, ESQUIRE

JESSICA MEYERS, ESQUIRE

SAMUEL MONIZ, ESQUIRE

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1 A P P E A R A N C E S C O N T I N U E D
2 ON BEHALF OF THE DEFENDANT AND COUNTER-PLAINTIFF:

3
4 ELAINE CHARLSON BREDEHOFT, ESQUIRE
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11
12 ALSO PRESENT:

13 JOHN C. DEPP II
14 MICHELLE BREDEHOFT
15 CATHERINE GONZALEZ - Videoconference Tech
16 TALLAL DAHAR - Videographer

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Conducted on January 12, 2022

200

1	A	That's true, my name is on it.	02:35:24
2	Q	Could they publish something without your	02:35:25
3		explicit permission?	02:35:27
4	MS. BREDEHOFT:	Objection to the form of	02:35:29
5		the question.	02:35:30
6		Go ahead.	02:35:30
7	THE WITNESS:	A lot of people publish	02:35:30
8		things about me all the time without my permission.	02:35:32
9		I participated in writing this op ed but that has	02:35:34
10		nothing to do with me controlling when or how it is	02:35:38
11		released.	02:35:41
12	BY MR. CHEW:		02:35:42
13	Q	On how many occasions have people published	02:35:42
14		things in your name without your permission?	02:35:44
15	MS. BREDEHOFT:	Objection to the form of	02:35:47
16		the question; miss -- mischaracterizes her	02:35:49
17		testimony.	02:35:52
18		Go ahead.	02:35:53
19	THE WITNESS:	I think you -- I disagree	02:35:53
20		with what you just said in -- in terms of it being a	02:35:56
21		reflection on what I have said. I said people write	02:36:00
22		about things using my name all the time without my	02:36:04
23		permission. However, I put my name to this and	02:36:08
24		they, of course, got my permission to do so.	02:36:14
25	MR. CHEW:	Right. So the --	02:36:18

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Conducted on January 12, 2022

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1	THE WITNESS: Those are different things.	02:36:20
2	BY MR. CHEW:	02:36:22
3	Q So the answer to my question have there	02:36:22
4	been any occasions on which people have published	02:36:25
5	things in your name without your permission --	02:36:28
6	A Not that I --	02:36:31
7	MS. BREDEHOFT: Objection to the form of	02:36:33
8	the question.	02:36:34
9	Go ahead.	02:36:34
10	THE WITNESS: In my name, no, not to my	02:36:35
11	knowledge.	02:36:38
12	MR. CHEW: There we go. We've got an	02:36:38
13	answer. Okay. Let's show you what's been marked as	02:36:40
14	Exhibit 7.	02:36:43
15	(Exhibit No. 7 was marked for	02:37:01
16	identification by the Stenographer;	02:37:01
17	attached hereto.)	02:37:28
18	BY MR. CHEW:	02:37:28
19	Q Ms. Heard, do you recognize Exhibit 7 as	02:37:28
20	the final version of the op ed that you wrote?	02:37:31
21	A I don't know.	02:37:42
22	Q Do you have any reason sitting here today	02:37:42
23	to believe that this is not a true and correct copy	02:37:44
24	of the op ed that appeared in the Washington Post	02:37:46
25	and that's attached to the complaint that Mr. Depp	02:37:49

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Transcript of Amber Laura Heard - Day 1

Conducted on January 12, 2022

202

1 filed against you on March 1, 2019? 02:37:52

2 MS. BREDEHOFT: Objection to the form of 02:37:55

3 the question. And take your time to look at it. 02:37:56

4 BY MR. CHEW: 02:39:27

5 Q Is this your op ed, Ms. Heard? 02:39:28

6 A If you're representing to me that this is 02:39:31

7 the op ed in full, it looks like what I wrote, but 02:39:35

8 I'd have to see -- I can't say one way or another 02:39:40

9 that this is word for word the exact copy without 02:39:43

10 seeing the -- 02:39:49

11 Q Okay. Well, I will represent to you that 02:39:50

12 it is and I think your attorney would be squawking 02:39:53

13 if it weren't. On the first page of the op ed, 02:39:55

14 Exhibit 7, do you see where it says "by Amber 02:39:57

15 Heard"? 02:40:00

16 A Yes, I do. 02:40:00

17 Q That's accurate, correct? I mean, you did 02:40:06

18 write the op ed, true? 02:40:09

19 MS. BREDEHOFT: Objection to the form of 02:40:11

20 the question. 02:40:12

21 Go ahead. 02:40:12

22 THE WITNESS: I -- with the help of -- with 02:40:13

23 assistance, I did it and -- and wrote it. These are 02:40:18

24 my words, I signed my name to it. 02:40:22

25 ///

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Transcript of Amber Laura Heard - Day 1
Conducted on January 12, 2022

203

1	BY MR. CHEW:	02:40:25
2	Q And you approved the -- the publication of	02:40:25
3	this version of the op ed, correct?	02:40:27
4	MS. BREDEHOFT: Objection to the form of	02:40:30
5	the question.	02:40:31
6	Go ahead.	02:40:31
7	THE WITNESS: Can -- I'm sorry. Please	02:40:32
8	repeat that.	02:40:33
9	BY MR. CHEW:	02:40:34
10	Q And you approved this version to be	02:40:34
11	published in the Washington Post on or about	02:40:37
12	December 18th, 2018, correct?	02:40:40
13	A I don't know what you mean by "this	02:40:43
14	version."	02:40:45
15	Q You approved this publication on December	02:40:46
16	18th, 2018, in the Washington Post, true?	02:40:49
17	MS. BREDEHOFT: Same objection. Objection	02:40:52
18	to the form of the question.	02:40:54
19	THE WITNESS: While I had no control or	02:40:58
20	approval control over certain aspects of where it	02:41:02
21	was published, when, or how, the substantive	02:41:05
22	information within the op ed is something that I	02:41:15
23	stand by.	02:41:16
24	BY MR. CHEW:	02:41:17
25	Q So you approved that this version of the op	02:41:17

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Transcript of Amber Laura Heard - Day 1
Conducted on January 12, 2022

204

1 ed be published, true or false? 02:41:21

2 MS. BREDEHOFT: Objection to the form of 02:41:23

3 the question. 02:41:24

4 THE WITNESS: The -- the information within 02:41:27

5 the op ed that I penned with the -- with the ACLU 02:41:27

6 is -- is what I stand by. 02:41:33

7 BY MR. CHEW: 02:41:34

8 Q And, in fact, it was published in the 02:41:34

9 Washington Post on December 18th, 2018, correct? 02:41:37

10 A That's what I understand. 02:41:42

11 Q And when did the first Aquaman movie 02:41:43

12 premiere? 02:41:46

13 A I'm -- I'm not sure. I believe it was in 02:41:47

14 December -- I think it was a Christmas release. 02:41:51

15 Q So it was the same month that your op ed 02:41:53

16 appeared, correct? 02:41:56

17 A I believe that. 02:41:57

18 Q **Now, let's go through this. The version --** 02:41:57

19 **this percent of the op ed is entitled "Amber Heard:** 02:42:00

20 **I spoke up against sexual violence and faced our** 02:42:03

21 **culture's wrath. That has to change." What are you** 02:42:07

22 **referring to there?** 02:42:10

23 MS. BREDEHOFT: Objection to the form of 02:42:10

24 the question; assumes facts not in evidence. 02:42:12

25 Go ahead. 02:42:14

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Transcript of Amber Laura Heard - Day 1

Conducted on January 12, 2022

205

1 THE WITNESS: Well, I -- I didn't write 02:42:15
2 this title. 02:42:16
3 BY MR. CHEW: 02:42:19
4 Q Who wrote the title? 02:42:20
5 A I -- I'm not sure. 02:42:21
6 Q But you approved the title, correct? 02:42:23
7 A I never saw the title before it was -- 02:42:25
8 before it was printed or -- or went to press as far 02:42:30
9 as I can recall. 02:42:35
10 Q Did you ever complain to the Washington 02:42:35
11 Post, the ACLU, or anybody else about the title? 02:42:38
12 A No, I did not. 02:42:41
13 Q Why not? 02:42:42
14 MS. BREDEHOFT: Objection to the form of 02:42:44
15 the question; calls for speculation, hearsay. 02:42:45
16 Go ahead. 02:42:47
17 THE WITNESS: I didn't see any reason why I 02:42:47
18 should complain. 02:42:50
19 BY MR. CHEW: 02:42:52
20 Q When did you speak up against sexual 02:42:53
21 violence? 02:42:55
22 A I've given many speeches. I have given a 02:42:56
23 lot of commentary. I have given a lot of support to 02:43:06
24 people who've also gone through similar things, 02:43:11
25 albeit less public, many times. 02:43:16

<p style="text-align: right;">217</p> <p>1 BY MR. CHEW: 2 Q That's not the question. I'm not asking 3 about that. 4 A -- and later asked a lawyer to help me make 5 sure that my -- the record reflected that and I got 6 it expunged. 7 Q You need to -- you need to answer the 8 question. You have to answer the question. Did the 9 police officer make a mistake in your opinion? 10 MS. BREDEHOFT: I'm going to object to your 11 raising your voice and -- and speaking to my client 12 in that manner. Asked and answered. 13 But go ahead and -- same objections I had 14 last time. Go ahead. 15 THE WITNESS: All I can do is tell you the 16 facts that I do know. I can't tell you whether a 17 mistake was made or not. I just know that I have 18 never been violent with any of my partners and 19 certainly not Tasya. 20 You know, there are many times I had to 21 defend myself against Johnny, but Tasya and I had a 22 very peaceful, loving relationship and this was an 23 incident that at best was misinterpreted and -- and 24 was dropped because of how -- how the evidence or 25 lack thereof showed how misinterpreted it was.</p>	<p style="text-align: right;">219</p> <p>1 after no. 2 Q Are you aware of any claim made by any 3 woman that Mr. Depp ever physically harmed her? 4 MS. BREDEHOFT: Objection to the form of 5 the question; calls for hearsay, speculation, 6 hypothetical. 7 Go ahead. 8 THE WITNESS: I had -- I had heard rumors. 9 I've been told by people about his past only around 10 the latter part of our relationship. 11 So I -- I had heard rumors about this, 12 about his conduct with former girlfriends, former 13 partners. I heard that he had an incident with 14 Kate Moss on the stairs. There was -- you know, I 15 was struck by hearing that Winona Ryder used the 16 same language in talking about Johnny. She 17 mentioned a monster when she confided in someone in 18 a bathroom when she was dating him. 19 I had heard rumors to this effect, you 20 know, I had -- I read in part of Ms. Barkin's 21 testimony that he threw a bottle in her direction 22 and, you know, displayed the same sort of possessive 23 emotional psychological violence that I saw in 24 Johnny, you know, throughout our relationship. But 25 I do not know firsthand how he was because I -- I</p>
<p style="text-align: right;">218</p> <p>1 BY MR. CHEW: 2 Q Were the police correct in handcuffing you? 3 A I can't -- 4 MS. BREDEHOFT: Objection to the form of 5 the question; calls for speculation, hypothetical, 6 legal conclusions. 7 Go ahead. 8 THE WITNESS: I'm not an officer of the 9 law. I'm not law enforcement. I cannot tell you 10 what they should or should not do. I can just tell 11 you the truth of what happened because I was there 12 and I'm trying to answer you fully. 13 BY MR. CHEW: 14 Q In -- in the course of your relationship 15 with Mr. Depp, was he ever handcuffed for allegedly 16 assaulting you? 17 A No. 18 I did my best to keep this from the police. 19 Q And in the course of your relationship with 20 Mr. Depp, did he ever spend the night in jail for 21 touching you inappropriately or grabbing your wrist? 22 A No. 23 I wanted nothing but to protect Johnny from 24 this. 25 MR. CHEW: Move to striking everything</p>	<p style="text-align: right;">220</p> <p>1 wasn't there, and I still have yet to -- to ever 2 claim to have been there in his prior relationships. 3 BY MR. CHEW: 4 Q Did Ms. Moss ever make any kind of public 5 claim that Mr. Depp at any time physically harmed 6 her? 7 MS. BREDEHOFT: Objection to the form of 8 the question; calls for hearsay, speculation. 9 Go ahead. 10 THE WITNESS: I do not know of any claims 11 public -- publicly that were made. 12 BY MR. CHEW: 13 Q Right. And that -- the same goes for 14 Ms. Ryder, correct? 15 MS. BREDEHOFT: Same objections. 16 THE WITNESS: I -- I do not know. I have 17 been told that they signed confidentiality 18 agreements or something to that effect, but I don't 19 know -- 20 BY MR. CHEW: 21 Q Who -- who told you that? 22 A I believe -- setting aside from what I've 23 heard from counsel, I have been told that by at 24 least one or two people. I can't recall, maybe 25 one -- Amanda de Cadenet told me a few of these</p>

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Transcript of Amber Laura Heard - Day 2

1 (342 to 345)

Conducted on January 13, 2022

342	344
<p>1 VIRGINIA</p> <p>2 IN THE CIRCUIT COURT OF FAIRFAX COUNTY</p> <p>3</p> <p>4 ----- x</p> <p>5 JOHN C. DEPP, II, :</p> <p>6 Plaintiff and :</p> <p>7 Counter-Defendant, : Civil Action No.</p> <p>8 v. : CL-2019-0002911</p> <p>9 AMBER LAURA HEARD, : Volume 2</p> <p>10 Defendant and :</p> <p>11 Counter-Plaintiff. :</p> <p>12 ----- x</p> <p>13</p> <p>14 CONFIDENTIAL</p> <p>15 Videotaped Deposition of AMBER LAURA HEARD</p> <p>16 Irvine, California</p> <p>17 Thursday, January 13, 2022</p> <p>18 9:41 a.m. PST</p> <p>19</p> <p>20</p> <p>21</p> <p>22 Job No.: 421208</p> <p>23 Pages: 342 - 673</p> <p>24 Reported By: Rhonda Norberg, RPR</p> <p>25 CSR No. 9265, CCRR No. 185</p>	<p>1 A P P E A R A N C E S</p> <p>2</p> <p>3 ON BEHALF OF THE PLAINTIFF AND COUNTER-DEFENDANT:</p> <p>4 BENJAMIN G. CHEW, ESQUIRE</p> <p>5 LEO PRESIADO, ESQUIRE</p> <p>6 CAMILLE VASQUEZ, ESQUIRE</p> <p>7 JESSICA MEYERS, ESQUIRE</p> <p>8 SAMUEL MONIZ, ESQUIRE</p> <p>9 STEPHANIE CALNAN, ESQUIRE</p> <p>10 YARELYN MENA, ESQUIRE</p> <p>11 HONIEH UDENKA, ESQUIRE</p> <p>12 BROWN RUDNICK, LLP</p> <p>13 601 13th Street, NW</p> <p>14 Suite 600</p> <p>15 Washington, D.C. 20005</p> <p>16 202.536.1700</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
343	345
<p>1 CONFIDENTIAL Videotaped Deposition of</p> <p>2 AMBER LAURA HEARD, held at 2211 Michelson Drive, Seventh</p> <p>3 Floor, Irvine, California 92612.</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10 Pursuant to notice, before Rhonda Norberg,</p> <p>11 Certified Shorthand Reporter No. 9265, CCRR No. 185</p> <p>12 in and for the State of California.</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>1 A P P E A R A N C E S C O N T I N U E D</p> <p>2 ON BEHALF OF THE DEFENDANT AND COUNTER-PLAINTIFF:</p> <p>3</p> <p>4 ELAINE CHARLSON BREDEHOFT, ESQUIRE</p> <p>5 BEN ROTTENBORN, ESQUIRE</p> <p>6 ADAM NADELHAFT, ESQUIRE</p> <p>7 CLARISSA PINTADO, ESQUIRE</p> <p>8 DAVID MURPHY, ESQUIRE</p> <p>9 CHARLSON BREDEHOFT COHEN & BROWN, PC</p> <p>10 11260 Roger Bacon Drive</p> <p>11 Suite 201</p> <p>12 Reston, Virginia 20190</p> <p>13 703.318.6800</p> <p>14</p> <p>15 ALSO PRESENT:</p> <p>16 JOHN C. DEPP II</p> <p>17 MICHELLE BREDEHOFT</p> <p>18 LUCIEN NEWELL - Videoconference Tech</p> <p>19 TALLAL DAHAR - Videographer</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

<p style="text-align: right;">570</p> <p>1 disrespectful; I'm just saying she is your acting 2 coach, or has been -- 3 A Was. 4 Q Ms. Sexton was your acting coach and also 5 by your testimony, a dear friend, so she is one of 6 the people you told; is that fair? 7 A Yes. 8 Q When did you tell Ms. Sexton that you were 9 raped in Australia, allegedly by Mr. Depp? 10 A I don't recall. 11 Q Didn't you tell her the day that Ms. Sexton 12 was appointed to sit for a deposition in this case? 13 A I have no idea when she was subpoenaed. 14 Q But isn't that when you told her? 15 A I don't know -- I had no idea of the date 16 she was subpoenaed so I don't know if that's the 17 same day I told her. 18 Q Didn't you tell her at your home when your 19 lawyers came to your house to prep her for a 20 deposition in this case? 21 A I don't recall that that's why she was 22 there. I recall that she was there because she 23 lived abroad and it was on rare occasions that she 24 was in LA, and we very rarely get to spend one on 25 one time together in person. And there a was a</p>	<p style="text-align: right;">572</p> <p>1 A Dr. Carolyn Alexander. 2 Q And you told Dr. Carolyn Alexander? 3 A I don't know if I told her. I just 4 remember I started making it a habit to start 5 telling doctors that I was in that situation with. 6 I told another doctor in the UK that I saw as a 7 gynecologist but I can't remember their name. I 8 told -- oh -- I've seen a few, but I'm sure we can 9 get those names to you. 10 Q Yeah, I think we're going to need every 11 name of every doctor you've ever told about this 12 sexual assault in Australia. 13 A Okay. Of course. 14 Q So the Australia incident, you testified 15 that this all started because you and Mr. Depp were 16 having a disagreement about whether you should sign 17 a postnuptial agreement? 18 A I disagree. It wasn't -- 19 Q How? 20 A Pardon? 21 Q How do you disagree? 22 A What started the disagreement is he held up 23 a bag of MDMA right in front of me and he took a big 24 handful of pills and that kind of started it. 25 Q Do you have your first witness statement</p>
<p style="text-align: right;">571</p> <p>1 time -- a separate time in which the UK Sun 2 attorneys were conducting an interview of me, but I 3 don't know -- I don't -- I don't know if they were 4 there. I don't know how that timeline matches with 5 her. 6 Q Did you tell anyone else about the alleged 7 sexual assault in Australia other than your 8 attorneys and Ms. Sexton? 9 A I -- I -- I told doctors. 10 Q What doctors? 11 A I've told, obviously, Bonnie Jacobs. I 12 don't recall if I told -- I don't recall if I -- I 13 told Amy Banks. I really just don't remember Dr. -- 14 if I told Dr. Banks at some point after. I told 15 every gynecologist I've visited. 16 Q Who is your gynecologist now? 17 A I -- I just started going to a new one. I 18 don't remember her name but I'm sure we could find 19 it. I don't know it off the top of my head. 20 Q Who was your gynecologist before this 21 gynecologist? 22 A There -- -- I've had a couple. I was 23 actually just using my fertility doctor effectively 24 as my gynecologist. 25 Q Who is your fertility doctor?</p>	<p style="text-align: right;">573</p> <p>1 from the United Kingdom in front of you, Ms. Heard? 2 It was probably given to you yesterday. If not, we 3 have another copy. 4 A The first one? 5 Q Yeah. First -- this says "witness 6 statement Amber Heard"? 7 A Yeah. 8 Q Okay. If I could turn your attention, 9 Ms. Heard, to Page 23. 10 MS. VASQUEZ: If not, we have an extra 11 copy. 12 MR. CHEW: I've got one if you need one, 13 Elaine. I've got a unmarked one. 14 MS. BREDEHOFT: Thank you. Thank you very 15 much. 16 MS. VASQUEZ: Page 23, Elaine. 17 Q Ms. Heard, if I could just have you read to 18 yourself Paragraphs 99, 100, that would be helpful. 19 A Okay. 20 Q You would agree with me, Ms. Heard, that 21 you did argue in Australia about a prenuptial 22 agreement, correct? 23 A It was part of -- it was part of one part 24 of one of the arguments, but it wasn't -- as I said 25 before, wasn't what started it. It was the drugs</p>