

# Transcript of Dr. Connell Cowan

**Date:** December 8, 2021 **Case:** Depp, II -v- Heard

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1	IN THE CIRCUIT COURT FOR
2	FAIRFAX COUNTY, VIRGINIA
3	x
4	JOHN C. DEPP, II, :
5	Plaintiff and :
6	Counter-Defendant, : Civil Action No.
7	v. : CL-2019-0002911
8	AMBER LAURA HEARD, :
9	Defendant and :
10	Counter-Plaintiff. :
11	x
12	
13	VIDEOTAPED DEPOSITION OF DR. CONNELL COWAN
14	CONFIDENTIAL
15	HELD REMOTELY
16	Wednesday, December 8, 2021
17	9:30 am PST / 12:30 pm EST
18	
19	
20	Job No.: 416245
21	Pages: 1 - 324
22	Reported By: Debi Pearce

1	Videotaped deposition of DR. CONNELL COWAN, held
2	remotely, pursuant to notice, before Debi Pearce,
3	Notary Public in and for the State of Maryland and
4	the Commonwealth of Virginia.
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1	APPEARANCES
2	
3	APPEARING VIA VIDEOCONFERENCE ON BEHALF OF
4	PLAINTIFF JOHN C. DEPP, II:
5	BENJAMIN CHEW, ESQUIRE
6	BROWN RUDNICK, LLP
7	601 Thirteenth Street, N.W.
8	Washington, D.C. 20005
9	202.536.1700
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12	APPEARING VIA VIDEOCONFERENCE ON BEHALF OF
13	PLAINTIFF JOHN C. DEPP, II:
14	LEO PRESIADO, ESQUIRE
15	STEPHANIE CALNAN, ESQUIRE
16	CAMILLE VASQUEZ, ESQUIRE
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#### Depp, II -v- Heard

1 APPEARANCES CONTINUED 2 3 APPEARING VIA VIDEOCONFERENCE ON BEHALF OF DEFENDANT AMBER LAURA HEARD: 4 5 ADAM NADELHAFT, ESQUIRE 6 CLARISSA PINTADO, ESQUIRE 7 CHARLSON BREDEHOFT COHEN & BROWN, P.C. 8 Suite 201 9 11260 Roger Bacon Drive 10 Reston, Virginia 20190 11 703.318.6800 12 13 14 ALSO PRESENT: 15 JEREMY DINEEN, PLANET DEPOS VIDEOGRAPHER 16 BRENNAN PLUMMER, PLANET DEPOS TECHNICIAN 17 DR. SHANNON CURRY 18 19 20 21 22

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1	tonight"?	18:41:13
2	A Well, when she came in, we discussed it,	18:41:14
3	yeah.	18:41:17
4	Q But she didn't tell you that he had	18:41:18
5	physically abused her; is that right?	18:41:22
6	MR. NADELHAFT: Objection, asked and	18:41:26
7	answered.	18:41:29
8	A My recollection is that she told me that	18:41:29
9	he pushed her down and she got right back up, and	18:41:32
10	I think that's when I, you know, she said, "I give	18:41:38
11	as good as I get." And, you know, we discussed,	18:41:44
12	you know, the danger of escalation versus	18:41:50
13	de-escalation, and the importance of her being	18:41:55
14	able to do that.	18:42:01
15	Q So she gave you the impression that she	18:42:02
16	pushed him as well that night; is that right?	18:42:04
17	MR. NADELHAFT: Objection.	18:42:07
18	A She didn't say she pushed him, she just	18:42:08
19	said, I got right back up. She told me that he	18:42:11
20	pushed her down, and she got right back up.	18:42:14
21	Q But she also said she "gives" as good as	18:42:17
22	she "gets," doesn't that indicate that she pushed	18:42:20

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1	him as well?	18:42:23
2	MR. NADELHAFT: Objection, asked and	18:42:24
3	answered.	18:42:26
4	A You could interpret it that way. I kind	18:42:26
5	of interpreted it more, you know, metaphorically,	18:42:31
6	that, when somebody comes at her, she goes back at	18:42:33
7	them, you know, in a similar way, whether it's	18:42:37
8	verbally or she protects herself. So maybe she	18:42:40
9	pushed him back. I don't know.	18:42:44
10	Q Okay. And you'll agree with me you	18:42:46
11	only heard her side of the story with respect to	18:42:48
12	this incident, correct?	18:42:51
13	A Yeah.	18:42:52
14	O So for example, you don't know 1f Mr. Dapp	18:42:53
15	acted in selli-defense, wight?	18:42:56
16	MR. NADELHAFT: Objection, form and	18:43:00
17	foundation	18:43:05
18	A No, I cam <sup>1</sup> t -	18:43:05
19	MR. NADELHAFT: misstates the record.	18:43:04
20	BY MR. PRESIADO:	18:43:06
21	0 So in fact, Mr. Dapp could have acted in	18:43:06
22	self-defense, but you don't know because you only	18:43:10

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1	heard one stde of the story, to that fatr to say?	18:43:15
2	MR. NADELHAFT: Objection to form,	18:43:16
3	speculation.	18:43:19
4	BY MR. PRESIADO:	18:43:19
5	Q I'm sorry, I missed that answer.	18:43:19
6	A That a containly so.	18:43:21
7	MR. PRESIADO: Madame reporter, did you	18:43:45
8	get that?	
9	THE COURT REPORTER: Yeah, I'm actually	
10	having trouble. Mr. Nadelhaft, you're very quiet	
11	to me. Can you just be a little louder, because	
12	we're talking over each other.	
13	MR. NADELHAFT: Sure.	
14	THE COURT REPORTER: Thanks.	
15	MR. PRESIADO: Did you get the objection?	
16	THE COURT REPORTER: I got the objection,	
17	but I didn't get the answer. Thank you.	
18	MR. PRESIADO: Okay. Why don't we, Debi,	
19	if you could read back the question.	18:43:46
20	And, Dr. Cowan, she didn't get your	
21	answer, so if you could just repeat it after you	
22	listen.	