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Transcript of Jacob Bloom, Esq.

Date: March 2, 2022
Case: Depp, II -v- Heard

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VIRGINIA:

IN THE CIRCUIT COURT FOR FAIRFAX COUNTY

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JOHN C. DEPP, II, :
Plaintiff, : Case No.
v. : CL-2019-0002911
AMBER LAURA HEARD, :
Defendant. :
----- x

Videotaped Deposition of JACOB BLOOM, ESQ.
Conducted Remotely via Zoom
Wednesday, March 2, 2022
12:34 p.m.

Job No.: 436014
Pages: 1 - 75
Reported By: AMY L. STRYKER, CCR

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| 1 | Q What was your specialty while you were | 12:37:54 |
| 2 | practicing law? | 12:37:56 |
| 3 | A I was an entertainment lawyer. | 12:37:57 |
| 4 | Q And was that in Los Angeles, California? | 12:38:01 |
| 5 | A Yes. | 12:38:04 |
| 6 | Q And can you please describe examples of | 12:38:04 |
| 7 | clients that you had over the years in the | 12:38:10 |
| 8 | entertainment industry. And we're going to label | 12:38:12 |
| 9 | this confidential so that it is under seal. | 12:38:15 |
| 10 | MR. SINGER: I'm going to object. It's | 12:38:20 |
| 11 | immaterial who Mr. Bloom's clients are. He | 12:38:21 |
| 12 | represented Mr. Depp. He's represented many other | 12:38:26 |
| 13 | people in the industry. Let's just get into the | 12:38:28 |
| 14 | issues that relate to this case. | 12:38:30 |
| 15 | Q When did you first meet Mr. Depp? | 12:38:32 |
| 16 | A I don't know when. I can't remember. | 12:38:34 |
| 17 | Q You performed services for Mr. Depp over a | 12:38:41 |
| 18 | period of time; is that correct? | 12:38:48 |
| 19 | A Yeah. | 12:38:51 |
| 20 | MR. CHEW: And, Mr. Bloom, obviously | 12:38:51 |
| 21 | that's -- that's fine to answer in a generic way. | 12:38:52 |
| 22 | I am going to be instructing you on behalf of your | 12:38:57 |

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| <p style="text-align: right;">21</p> <p>1 Johnny, Bates No. DEPP00019215, was marked for 2 identification and is attached to the transcript.) 3 AV TECHNICIAN: Exhibit 3. You have 4 control. 5 MS. BREDEHOFT: Thank you. 6 BY MS. BREDEHOFT: 7 Q Mr. Bloom, can you see this on the screen, 8 this document? 9 A Not really. 10 Q Is it too small? Does it need to be 11 enlarged? 12 A It's too small. 13 Q Okay. Let's see if we can make this a 14 little bigger. 15 Does that help? 16 A No. I don't understand it as of yet. 17 MS. BREDEHOFT: I think I need to get that 18 a little bit less. 19 THE WITNESS: I don't know who sent that, 20 United Talent Agency. 21 Q Okay. 22 MR. SINGER: There's no questions pending.</p> | <p style="text-align: right;">23</p> <p>1 Q Do you know who Joel Mandel is? 2 MR. SINGER: Okay, that's better. 3 THE WITNESS: Yes. 4 Q Okay. Do you recall in January of 2016 5 Tracey Jacobs telling you that, On Thursday, Joel 6 will walk him through the math of what he needs to 7 do to be financially okay? 8 MR. CHEW: Objection; leading. 9 MR. SINGER: Is the question does he 10 remember this e-mail? 11 THE WITNESS: No, not specifically. 12 Q All right. Do you recall in January of 13 2016 Tracey Jacobs saying that Mr. Depp needs to 14 do two big movies this year plus commercials, and 15 sell the French house? 16 MR. CHEW: Objection; leading, 17 argumentative, assumes facts not in the record, 18 lack of foundation. 19 Q Do you remember the question, Mr. Bloom? 20 A No, I don't. 21 MS. BREDEHOFT: Amy, can you please read 22 the question back.</p> |
| <p style="text-align: right;">22</p> <p>1 Q All right. I'm going to show you what has 2 been marked as Exhibit No. 3. It is an e-mail 3 from Tracey Jacobs. 4 Do you recall who Tracey Jacobs was? 5 A No; I recall who she was. 6 Q What do you recall about Tracey Jacobs? 7 A I don't really remember, so you have to be 8 more specific. 9 Q Do you recall that Tracey Jacobs was 10 Mr. Depp's agent? 11 A Yes. 12 Q Okay. Now, this was an e-mail sent from 13 Tracey Jacobs to Jim Berkus, Jeremy Zimmer, and 14 jab@bhdr.com. 15 That's you, correct? 16 A Yes. 17 Q And Joel -- and that was -- I believe this 18 was Joel Mandel at aol.com. Do you see that? 19 MR. CHEW: Objection; leading. 20 MR. SINGER: The question is does he know 21 what that e-mail address is? You can ask if he 22 knows who joeltmg is.</p> | <p style="text-align: right;">24</p> <p>1 (The court reporter read the pertinent 2 part of the record.) 3 MR. CHEW: Objection; leading, 4 argumentative, assumes facts not in the record, 5 lack of foundation. 6 THE WITNESS: Do I answer? 7 MR. SINGER: You can answer. Do you 8 remember this -- over six years ago this being 9 communicated to you? 10 THE WITNESS: No, I don't. 11 MR. SINGER: Okay. Next question. 12 BY MS. BREDEHOFT: 13 Q Do you recall Mr. Depp having financial 14 issues in January of 2016? 15 A Ask his business manager. 16 MR. CHEW: She did. She already deposed 17 Joel Mandel. 18 THE WITNESS: Yes. 19 MR. SINGER: Okay, he's answered the 20 question. He didn't know. He said you can ask -- 21 he doesn't recall, you can ask his business 22 manager.</p> |

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| 1 | Cross-Complaint against Mr. Depp? | 13:24:06 |
| 2 | A No, I don't remember. | 13:24:08 |
| 3 | Q Okay. I'm going to ask you to turn to | 13:24:11 |
| 4 | paragraph 10. And it says there: Beginning in | 13:24:16 |
| 5 | 1999, Bloom Hergott or its predecessors provided | 13:24:22 |
| 6 | entertainment-related legal services to | 13:24:25 |
| 7 | Cross-Defendants. | 13:24:28 |
| 8 | Does that help refresh your recollection | 13:24:31 |
| 9 | of when you began representation of Mr. Depp? | 13:24:33 |
| 10 | A No, it doesn't -- it doesn't recall -- I | 13:24:37 |
| 11 | don't recall. And I say it strongly to you, I | 13:24:43 |
| 12 | don't recall the particular cause of action, | 13:24:50 |
| 13 | et cetera. | 13:24:56 |
| 14 | Q Do you recall beginning representing | 13:24:59 |
| 15 | Mr. Depp in 1999? | 13:25:03 |
| 16 | MR. CHEW: Objection; asked and | 13:25:07 |
| 17 | answered -- | 13:25:08 |
| 18 | THE WITNESS: I don't recall. | 13:25:08 |
| 19 | MR. CHEW: -- several times. | 13:25:09 |
| 20 | Q I'm sorry, what is your answer, Mr. Bloom? | 13:25:14 |
| 21 | A I don't know. It's all confusing to me. | 13:25:15 |
| 22 | Q Now, you also alleged in paragraph 11, | 13:25:20 |

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| <p style="text-align: right;">61</p> <p>1 postnuptial agreement with Mr. Depp? 2 MR. CHEW: I would object and instruct the 3 witness not to answer to the extent that it would 4 require him to disclose communications that he had 5 with Mr. Depp. 6 MS. BREDEHOFT: I'm not asking that. 7 Q I'm asking very specifically: Have you 8 ever had any conversation with Amber Heard about a 9 prenuptial agreement or a postnuptial agreement? 10 MR. CHEW: I don't think he can answer 11 that without divulging communications he had with 12 his client, Mr. Depp. 13 MR. SINGER: You can answer the -- 14 Q Let's try it again. 15 MR. SINGER: Excuse me. 16 You can answer the question if you recall 17 ever having any conversation with Amber Heard 18 alone. Amber Heard bringing up the subject of a 19 prenup or postnup. Do you ever remember that 20 being discussed with her? 21 THE WITNESS: No. 22 Q Have you ever had any communications with</p> | <p style="text-align: right;">63</p> <p>1 Q Do you recall how many times that was? 2 A Six or seven. 3 Q Were you at birthday celebrations where 4 Amber Heard was celebrating her birthday? 5 A Yes. 6 Q And you think that was six occasions, 7 approximately? 8 A Yeah. 9 Q What do you recall from any of those 10 birthday celebrations? 11 A Nothing specific. 12 Q Do you recall anything more generally 13 about them, any impressions you had? 14 A No, no, no. 15 Q You just recall that there was a birthday 16 celebration? 17 A Yes. 18 Q Do you recall observing any kind of 19 interactions between Ms. Heard and Mr. Depp at any 20 of these birthday celebrations? 21 A (Inaudible.) 22 MR. CHEW: Objection; vague and ambiguous.</p> |
| <p style="text-align: right;">62</p> <p>1 Amber Heard about any issues in Australia about 2 the dogs? 3 A With what? 4 Q With dogs. Them bringing their dogs into 5 Australia? 6 A No. 7 Q You've not had any conversation or 8 communication with Amber Heard about that; is that 9 correct? 10 A No. Strongly no. 11 Q Okay. And I asked that so badly. My 12 apologies. 13 So when you say "no," no is -- "strongly 14 no," you have not had any communications with 15 Amber Heard, is that correct, about the dogs in 16 Australia? 17 A Yes. 18 Q Okay. Thank you. 19 Have you ever seen Amber Heard together in 20 person? 21 A Yes. I did meet her at various birthdays 22 where she was celebrating her birthday.</p> | <p style="text-align: right;">64</p> <p>1 MR. SINGER: He answered no. 2 MS. BREDEHOFT: Did you get that, Amy? 3 THE REPORTER: (Nonverbal response.) 4 MS. BREDEHOFT: Okay. 5 BY MS. BREDEHOFT: 6 Q Mr. Bloom, I'm sorry, I need you to repeat 7 your answer. 8 A No. 9 Q Thank you. 10 MS. BREDEHOFT: Can we pull up Exhibit 11 No. 8, please. 12 AV TECHNICIAN: Please stand by. 13 (Bloom 8, 5/24/2016 letter, Bates Nos. 14 ALH_00010345 and ALH_00010346, was marked for 15 identification and is attached to the transcript.) 16 AV TECHNICIAN: Exhibit 8. 17 Q Mr. Bloom, I'm going to try to blow this 18 up, first of all, so it goes a little bit bigger. 19 I'm going to ask you to take a look at 20 what has been marked as Deposition Exhibit No. 8. 21 And it's a letter dated May 24, 2016 to you and 22 it's from Samantha Spector of Spector Law. And</p> |

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| 1 | A No. | 13:35:50 |
| 2 | Q Do you have any knowledge of any domestic | 13:35:51 |
| 3 | violence by Mr. Depp against Ms. Heard? | 13:36:03 |
| 4 | MR. CHEW: Objection -- | 13:36:07 |
| 5 | THE WITNESS: No. | 13:36:08 |
| 6 | MR. CHEW: -- argumentative, leading, | 13:36:10 |
| 7 | assumes facts contrary to the record. | 13:36:11 |
| 8 | THE WITNESS: No. | 13:36:14 |
| 9 | Q Do you have any knowledge of any | 13:36:16 |
| 10 | allegations by Mr. Depp of domestic abuse by | 13:36:17 |
| 11 | Ms. Heard? | 13:36:21 |
| 12 | A No. | 13:36:23 |
| 13 | Q Now, it says, further along, Kindly let me | 13:36:23 |
| 14 | know at your earliest convenience if you and your | 13:36:41 |
| 15 | client are agreeable to doing so, as well as which | 13:36:44 |
| 16 | judicial officers are acceptable. Upon hearing | 13:36:47 |
| 17 | from you, I will have my assistants obtain rates | 13:36:50 |
| 18 | and availabilities, and it's in the context of | 13:36:53 |
| 19 | proposing private retired judicial officers. | 13:36:56 |
| 20 | Do you have a recollection of responding | 13:36:59 |
| 21 | to this and indicating whether you had any | 13:37:01 |
| 22 | objection to these judicial officers or someone | 13:37:05 |