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# Transcript of Laura Divenere

**Date:** January 15, 2021  
**Case:** Depp, II -v- Heard

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Transcript of Laura Divenere  
Conducted on January 15, 2021

1 (1 to 4)

<p>1 VIRGINIA: 2 IN THE CIRCUIT COURT OF FAIRFAX COUNTY 3 4 JOHN C. DEPP, II, 5 Plaintiff, 6 v. 7 AMBER LAURA HEARD, 8 Defendant. 9 10 11 12 13 Deposition of LAURA DIVENERE 14 Conducted Virtually 15 Friday, January 15, 2021 16 12:04 p.m. 17 18 19 20 Job No: 344477 21 Pages: 1-173 22 Reported by: Tracy Obering, RPR/CCSR</p> <p>Civil Action No.: CL-2019-0002911</p>	<p>1 APPEARANCES 2 ON BEHALF OF THE PLAINTIFF: 3 (Present Via Videoconference) 4 CAMILLE VASQUEZ, ESQUIRE 5 STEPHANIE CALNAN, ESQUIRE 6 SAMUEL A. MONIZ, ESQUIRE 7 BROWN RUDNICK, LLP 8 2211 Michelson Drive 9 Irvine, California 92612 10 (949) 752-7100 11 12 ON BEHALF OF THE DEFENDANT: 13 (Present Via Videoconference) 14 J. BENJAMIN ROTTENBORN, ESQUIRE 15 WOODS ROGERS, PLC 16 10 South Jefferson Street 17 Suite 1800 18 Roanoke, Virginia 24011 19 (540) 983-7540 20 21 22</p>
<p>1 Deposition of LAURA DIVENERE, conducted 2 virtually. 3 4 5 Pursuant to notice, before Tracy 6 Obering, Registered Professional 7 Reporter/California Shorthand Reporter. 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22</p>	<p>1 APPEARANCES (Continued) 2 ON BEHALF OF THE WITNESS: 3 (Present Via Videoconference) 4 LEE A. SHERMAN, ESQUIRE 5 CALLAHAN, THOMPSON, SHERMAN 6 &amp; CAUDILL, LLP 7 2601 Main Street 8 Suite 800 9 Irvine, California 92614 10 (949) 261-2872 11 12 ALSO PRESENT VIA VIDEOCONFERENCE: 13 AMBER HEARD, DEFENDANT 14 ALEX SUSSMAN, PLANET DEPOS TECHNICIAN 15 JEAN-LOUIS ZIESCH, VIDEOGRAPHER 16 17 18 19 20 21 22</p>

<p>13</p> <p>1 BY MR. ROTTENBORN: 2 Q. Without disclosing anything to me about 3 what you and Mr. Sherman talked about, what did 4 you do to prepare for your deposition today? 5 A. I did -- 6 MR. SHERMAN: Well, I'm going to object 7 that it does call for attorney/client privilege 8 generally, but you can answer the question. 9 THE WITNESS: I didn't prepare. 10 BY MR. ROTTENBORN: 11 Q. Okay. Did you speak to anyone who 12 wasn't your attorney in preparation for today's 13 deposition? 14 A. No. 15 Q. Okay. When did you -- and I know that 16 your attendance today is -- is reluctant. That's 17 fair to say; right? 18 A. It is. It's not my comfort zone. 19 Q. Right. Right. I get it. 20 And your involvement in this case 21 generally has been reluctant and out of your 22 comfort zone too; right?</p>	<p>15</p> <p>1 that, particularly the -- the large yellow text at 2 the top. Yep, just scroll down a little bit. 3 (Deposition Exhibit Number 1 4 was marked for identification) 5 BY MR. ROTTENBORN: 6 Q. And if you ever need anything enlarged 7 or if you need -- 8 A. I'm good. 9 Q. All right. Just let us know. Okay? 10 A. Uh-huh. Thank you. 11 Q. Is this -- 12 MR. ROTTENBORN: Can you shrink that a 13 little bit, Alex, so we can see a little more of 14 it? Thanks. 15 BY MR. ROTTENBORN: 16 Q. Is this the text that you were just 17 referring to, Ms. Divenere? 18 A. Yes. 19 Q. What was your reaction to receiving this 20 text? 21 A. You know, I was a little horrified. I 22 was, you know, I was concerned, just because I</p>
<p>14</p> <p>1 A. True. 2 Q. When did you first become involved in -- 3 and when I say, "this case," you understand that 4 I'm referring to the lawsuit pending between 5 Mr. Depp and Ms. Heard in Virginia; correct? 6 A. Correct. 7 Q. When did you first become involved in 8 this case? 9 A. When I received a text from Mr. Waldman. 10 Q. And Mr. Waldman is Mr. Depp's -- one of 11 Mr. Depp's attorneys? 12 A. Correct. 13 Q. I'm going to ask Alex to pull up the 14 exhibit that's been uploaded that's called, 15 "Waldman Text to Laura D." 16 And, Ms. Divenere, the way this is going 17 to work is you're going to -- I'm going to show 18 you a few documents today. It won't be many, but 19 a few. And I'm going to put them up, or the 20 Planet Depos tech person is going to put them up 21 on the screen like this. 22 MR. ROTTENBORN: And if you can enlarge</p>	<p>16</p> <p>1 felt like I really -- you know, it was a couple 2 years later. I didn't really, you know, I didn't 3 know why I was involved with it. And I -- I felt 4 a little threatened by it, to be honest. 5 Q. Did this text make you feel 6 uncomfortable? 7 A. Yes. 8 Q. And did it -- did it make you feel like 9 you were being put under pressure by Mr. Waldman 10 to make a Declaration in Mr. Depp's favor? 11 MS. VASQUEZ: Objection. Leading the 12 witness. 13 MR. ROTTENBORN: You can answer. 14 THE WITNESS: Yes. 15 BY MR. ROTTENBORN: 16 Q. Did you feel pressured by Mr. Waldman to 17 say things that were unfavorable about Ms. Heard? 18 MS. VASQUEZ: Objection, leading. 19 BY MR. ROTTENBORN: 20 Q. You can answer. 21 A. Yes. 22 Q. And I believe you testified to this, but</p>

<p style="text-align: right;">17</p> <p>1 did you feel that Mr. Waldman was threatening you 2 with some negative consequences personally if you 3 didn't cooperate with him? 4 MS. VASQUEZ: Objection, leading. 5 THE WITNESS: Yes. 6 BY MR. ROTTENBORN: 7 Q. Did you feel that Mr. Waldman's conduct 8 in sending you this text and in getting you to 9 sign a Declaration was appropriate? 10 MS. VASQUEZ: Objection, leading. Vague 11 and ambiguous as to "appropriate." 12 MR. SHERMAN: Yeah, I'm going to object 13 to that as well. It also calls for a legal 14 conclusion in terms of whether -- I don't know 15 whether you mean by "appropriate," appropriate 16 conduct for a lawyer or not, but she wouldn't be 17 able to opine on that. 18 MR. ROTTENBORN: Okay. Well, she can 19 answer the question, so I'll ask it again with 20 your objections noted. 21 BY MR. ROTTENBORN: 22 Q. To you, as you understand the word</p>	<p style="text-align: right;">19</p> <p>1 THE WITNESS: Okay. 2 MR. SHERMAN: -- and then you answer the 3 question afterwards, unless I instruct you not to. 4 Okay? 5 THE WITNESS: Okay. 6 MR. SHERMAN: So go ahead and answer 7 that question. And if you need it read back or 8 you need to hear it again -- 9 THE WITNESS: Yes. 10 MR. SHERMAN: -- they can do that for 11 you, because it's been a minute. 12 THE WITNESS: Thank you. Can you repeat 13 the question? 14 BY MR. ROTTENBORN: 15 Q. Sure, yeah. At any point -- at any time 16 have -- have you believed that Ms. Heard somehow 17 concocted a hoax that she was abused by Mr. Depp? 18 MS. VASQUEZ: Same objections. 19 MR. SHERMAN: Same objections. 20 THE WITNESS: No. 21 BY MR. ROTTENBORN: 22 Q. Now, in this text from Mr. Waldman, he</p>
<p style="text-align: right;">18</p> <p>1 "appropriate," Ms. Divenere, did you feel that 2 Mr. Waldman's conduct in sending you this text 3 and getting a Declaration from you was 4 appropriate? 5 MS. VASQUEZ: Same objections. 6 THE WITNESS: No. 7 BY MR. ROTTENBORN: 8 Q. And at any point when you received this 9 text, or since then, have -- have you believed 10 that Ms. Heard somehow concocted a hoax that she 11 was abused by Mr. Depp? 12 MS. VASQUEZ: Objection, leading. 13 Assumes facts not in evidence. It's vague and 14 ambiguous. 15 MR. SHERMAN: Also overbroad. 16 THE WITNESS: I'm -- I'm sorry. Am I 17 supposed to answer this? 18 MR. SHERMAN: Yeah, you can -- 19 THE WITNESS: Okay. 20 MR. SHERMAN: Laura, you answer the 21 questions. When the objections come, just wait 22 and let them get made --</p>	<p style="text-align: right;">20</p> <p>1 says that he has you, quote, "all over the 2 surveillance video." Do you see that? 3 A. Yes. 4 Q. Did he ever show you any surveillance 5 videos from this building? 6 A. I don't recall. I believe I might have 7 seen one photo that he had -- that he had shown 8 me. In fact, he did show me one photo of myself 9 in an elevator. 10 Q. Was anyone else in that elevator with 11 you? 12 A. I don't remember. 13 Q. And Ms. Heard wasn't; correct? 14 A. I don't remember. 15 Q. And this building that is being referred 16 to in this text is the Eastern Columbia building 17 in which you resided at that time; correct? 18 A. Correct. 19 Q. Did you -- is it fair to say that this 20 text left you with the impression that if you 21 didn't cooperate, that you were going to have to 22 spend a significant amount on your own attorney?</p>

<p style="text-align: right;">29</p> <p>1 Q. And do you have any personal knowledge 2 of any fact that suggests that Ms. Heard's 3 statements regarding abuse at the hands of Johnny 4 Depp are false? 5 <b>A. I have --</b> 6 MR. SHERMAN: Object -- hold on. 7 Objection. It's overbroad and lacks 8 foundation as to this witness. 9 You can answer the question, Laura. 10 MS. VASQUEZ: I join in those 11 objections. 12 THE WITNESS: I'm sorry. Can you repeat 13 the question? 14 BY MR. ROTTENBORN: 15 Q. Sure. Do you have any personal 16 knowledge of any fact that suggests that 17 Ms. Heard's statements regarding abuse at the 18 hands of Johnny Depp are false? 19 <b>A. No.</b> 20 MS. VASQUEZ: Same objection. 21 MR. SHERMAN: Laura, did you answer? I 22 didn't hear you.</p>	<p style="text-align: right;">31</p> <p>1 Declaration he wanted? 2 MS. VASQUEZ: Objection, leading. 3 Assumes facts not in evidence. Calls for hearsay. 4 MR. SHERMAN: Also vague the way it's 5 phrased. 6 You can answer, Laura. 7 THE WITNESS: Yes. 8 BY MR. ROTTENBORN: 9 Q. And did you feel coerced to sign this 10 Declaration by Mr. Waldman? 11 MS. VASQUEZ: Objection, asked and 12 answered. Assumes facts not in evidence. 13 THE WITNESS: Yes. 14 BY MR. ROTTENBORN: 15 Q. I'd like to go to paragraph 5, please. 16 And paragraph 4 as well. 17 Do you see in paragraph 4 there's a 18 reference to an accusation that Amber Heard made 19 against Mr. Depp regarding an incident that 20 happened on Saturday, May 21st, 2016? 21 <b>A. Yes.</b> 22 Q. And then in paragraph 5, you talk about</p>
<p style="text-align: right;">30</p> <p>1 THE WITNESS: Yes. I'm sorry. I said, 2 no. 3 MR. ROTTENBORN: Alex, can you please 4 pull up the document entitled, "Declaration of 5 Laura Divenere Signed," and slowly scroll through 6 it, just so she can see all the pages and her 7 signature at the end, please. 8 (Deposition Exhibit Number 3 9 was marked for identification) 10 BY MR. ROTTENBORN: 11 Q. Ms. Divenere, is this the Declaration 12 that Mr. Waldman had you sign? 13 <b>A. Yes.</b> 14 Q. And did -- 15 MR. ROTTENBORN: You can scroll back up 16 to the top, please, Alex. 17 BY MR. ROTTENBORN: 18 Q. In your conversations with Mr. Waldman, 19 both in the text that we saw earlier and leading 20 up to signing this Declaration, did Mr. Waldman 21 leave you with the impression that you could be 22 charged with perjury if you didn't sign the</p>	<p style="text-align: right;">32</p> <p>1 seeing Ms. Heard in some of the days following 2 that alleged incident; correct? 3 <b>A. Yes.</b> 4 Q. You didn't see her -- to the best of 5 your knowledge, you didn't see her on May 21st 6 after the incident, did you? 7 <b>A. I honestly -- I don't recall.</b> 8 Q. Okay. And you didn't see her on May 9 22nd after the incident; right? 10 <b>A. I don't recall. I -- again, I don't --</b> 11 <b>these are just dates. And it's been so long, I</b> 12 <b>have no concept of that time.</b> 13 Q. And when -- when you say that you saw 14 her at least on May 23rd, 24th, and 25th, are 15 those -- is that your recollection that you saw 16 her on those days, or did Mr. Waldman tell you 17 that you saw her on those days? 18 MS. VASQUEZ: Objection, calls for 19 hearsay. Lack of foundation. Assumes facts not 20 in evidence. It's also vague and ambiguous as to 21 time. Her recollection when? 22 THE WITNESS: Those would have been</p>

<p style="text-align: right;">33</p> <p>1 dates that Mr. Waldman gave me. Because, again, I 2 don't have any correlation or idea of what those 3 dates were, especially after so many years. 4 BY MR. ROTTENBORN: 5 Q. And when it came to seeing signs of 6 abuse on Ms. Heard's face, Mr. Waldman told you 7 that if there had been abuse, that you would have 8 been able to see signs; right? That was something 9 he said to you? 10 MS. VASQUEZ: Objection, hearsay. 11 Assumes facts not in evidence, misstates the 12 record. 13 THE WITNESS: Yes. 14 BY MR. ROTTENBORN: 15 Q. And he told you that any signs of abuse 16 would have been very visible to you; right? 17 MS. VASQUEZ: Object -- same objections. 18 THE WITNESS: Yes. 19 BY MR. ROTTENBORN: 20 Q. But he never explained to you how or why 21 he would have any personal knowledge or any basis 22 to make such a statement; right?</p>	<p style="text-align: right;">35</p> <p>1 thanks. It's always -- always interesting with 2 Zoom with the little time delay; right? 3 To your knowledge, Mr. Waldman isn't an 4 expert on spousal abuse or domestic violence; 5 correct? 6 MS. VASQUEZ: Objection. 7 MR. SHERMAN: Objection. Lacks 8 foundation. Calls for speculation. Calls for a 9 legal conclusion as to the word, "expert," 10 depending on if you use it as a term of art. 11 MS. VASQUEZ: I'll join in those 12 objections. 13 BY MR. ROTTENBORN: 14 Q. You can answer. 15 A. Correct. 16 Q. And to your knowledge, Mr. Waldman isn't 17 an expert on what cuts and bruises and swelling 18 and other signs of abuse look like; right? 19 MS. VASQUEZ: Same objections. 20 THE WITNESS: Correct. 21 BY MR. ROTTENBORN: 22 Q. But nonetheless, Mr. Waldman led you to</p>
<p style="text-align: right;">34</p> <p>1 MS. VASQUEZ: Same objections. 2 THE WITNESS: Correct. 3 BY MR. ROTTENBORN: 4 Q. Mr. Waldman wasn't there on May 21st, 5 2016, to your knowledge; right? 6 A. To my knowledge -- 7 MR. SHERMAN: Objection. It lacks 8 foundation. Calls for speculation. 9 MS. VASQUEZ: Join. 10 MR. SHERMAN: You can answer, Laura. 11 THE WITNESS: Oh. Correct. 12 BY MR. ROTTENBORN: 13 Q. He never told you that he was there on 14 May 21st, 2016; right? 15 A. Correct. 16 MS. VASQUEZ: Objection. Calls for 17 hearsay. 18 Apologize, Ms. Divenere. I was a bit 19 delayed. 20 THE WITNESS: It's fine. 21 BY MR. ROTTENBORN: 22 Q. To your knowledge, Mr. Waldman --</p>	<p style="text-align: right;">36</p> <p>1 believe that if you didn't notice signs of abuse 2 on Ms. Heard's face, that she hadn't been abused; 3 right? 4 MS. VASQUEZ: Objection. Assumes facts 5 not in evidence. Misstates the record. Calls for 6 hearsay. 7 THE WITNESS: Correct. 8 BY MR. ROTTENBORN: 9 Q. Now, you did -- you mentioned this in 10 your conversation with Ms. Heard. You did see 11 Ms. Heard's face red and swollen on those days in 12 late May 2016 when you saw her; right? 13 MS. VASQUEZ: Objection. Assumes facts 14 not in evidence. It's compound. 15 THE WITNESS: To my recall, yes. 16 BY MR. ROTTENBORN: 17 Q. And you have no personal knowledge or 18 reason to believe that if you hadn't seen bruises 19 or cuts on Ms. Heard's face, that somehow she 20 wasn't abused and was making up the allegations of 21 abuse; right? 22 MR. SHERMAN: Objection. It's vague as</p>

<p style="text-align: right;">41</p> <p>1 <b>A. No, I – I'm still – I don't know why</b> 2 <b>I'm drawing a blank. Probably because this just</b> 3 <b>is not my thing.</b> 4 <b>So if she was wearing – could you</b> 5 <b>repeat the question one more time? I'm so sorry.</b> 6 Q. Sure. 7 MR. SHERMAN: And, Ben, not to be 8 difficult, but – but I think the problem is 9 the – the negatives. There are so many -- the 10 way the question is phrased in the negative with 11 multiple negatives in it, it -- it gets confusing, 12 and I think that's where the problem lies. 13 So maybe if we could phrase the question 14 affirmatively, it might be easier. But that's 15 just a suggestion, and I don't mean to step on 16 your -- your deposition in any way. 17 MR. ROTTENBORN: Thanks, Lee. 18 BY MR. ROTTENBORN: 19 Q. Ms. Divenere, if you -- to the extent 20 that you didn't notice cuts or bruises on 21 Ms. Heard's face, in the days that you saw her in 22 late May 2016, that could be because enough time</p>	<p style="text-align: right;">43</p> <p>1 BY MR. ROTTENBORN: 2 Q. And does the fact that you didn't -- 3 that you didn't notice cuts or bruises on her face 4 make you in any way doubt that she was the victim 5 of domestic violence on May 21st, 2016? 6 MS. VASQUEZ: Objection. Assumes facts 7 not in evidence. Calls for a conclusion. 8 THE WITNESS: Correct. 9 BY MR. ROTTENBORN: 10 Q. Does it make you doubt that at all? 11 MS. VASQUEZ: Objection. Vague and 12 confusing. 13 THE WITNESS: Does it make me doubt -- 14 I'm sorry. What does it make me doubt? 15 BY MR. ROTTENBORN: 16 Q. Does the fact that you -- does the fact 17 that you did not notice cuts or bruises on 18 Ms. Heard's face make you doubt at all that she 19 was the victim of domestic violence on May 21st, 20 2016? 21 MS. VASQUEZ: Objection. Vague and 22 confusing. Lacks foundation. Assumes facts not</p>
<p style="text-align: right;">42</p> <p>1 had passed that they were no longer as apparent; 2 right? 3 MS. VASQUEZ: Objection. Vague and 4 ambiguous. It's an improper hypothetical. 5 BY MR. ROTTENBORN: 6 Q. You can answer. 7 <b>A. Correct.</b> 8 Q. And it could also be because Ms. Heard 9 was wearing makeup that concealed those cuts and 10 bruises; correct? 11 MS. VASQUEZ: Same objections. Calls 12 for speculation. 13 THE WITNESS: Correct. 14 BY MR. ROTTENBORN: 15 Q. In your multi-year relationship -- 16 working relationship with Ms. Heard, was it 17 uncommon for her to wear makeup? 18 MS. VASQUEZ: Objection. Calls for 19 speculation. 20 THE WITNESS: I -- I don't recall. I've 21 seen her with both makeup and with -- and -- 22 and -- and not having makeup.</p>	<p style="text-align: right;">44</p> <p>1 in evidence. 2 THE WITNESS: No. 3 BY MR. ROTTENBORN: 4 Q. Now, you're aware that Mr. Depp has 5 tried to use your Declarations to suggest that 6 Ms. Heard wasn't abused and is lying about her 7 allegations of abuse; correct? 8 MS. VASQUEZ: Objection, compound. 9 Assumes facts not in evidence. 10 THE WITNESS: Correct. 11 BY MR. ROTTENBORN: 12 Q. Do you feel like anything in your 13 Declaration suggests in any way that Ms. Heard is 14 lying about her abuse allegations or wasn't abused 15 by Mr. Depp? 16 MS. VASQUEZ: Objection, compound. 17 We're talking about a three-page document with how 18 many paragraphs? Ten? 19 MR. ROTTENBORN: Camille, cut out the 20 speaking objections. Just make your objections 21 for the record, but don't do any more speaking 22 objections. Those aren't allowed in Virginia.</p>

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1 MS. VASQUEZ: All right. Well, we are  
2 in California, Ben, and they are allowed.  
3 THE WITNESS: I'm sorry, can you please  
4 repeat the question?  
5 BY MR. ROTTENBORN:  
6 Q. Do you feel like anything in your  
7 Declaration, Ms. Divenere, is suggesting that  
8 Ms. Heard is lying about her allegations of abuse?  
9 MS. VASQUEZ: Objection, compound.  
10 THE WITNESS: No.  
11 BY MR. ROTTENBORN:  
12 Q. Are you calling Ms. Heard a liar in your  
13 Declaration?  
14 A. No.  
15 MS. VASQUEZ: Objection. Lack of  
16 foundation.  
17 THE WITNESS: No.  
18 BY MR. ROTTENBORN:  
19 Q. And how do you feel personally about  
20 this Declaration that you've testified was coerced  
21 from you as the result of threats being used to  
22 paint Ms. Heard as a liar in her domestic abuse

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1 allegations?  
2 MS. VASQUEZ: Objection, compound.  
3 Assumes facts not in evidence. Vague and  
4 confusing.  
5 THE WITNESS: I'm sorry. Repeat the  
6 question.  
7 BY MR. ROTTENBORN:  
8 Q. How do you feel about your Declaration  
9 here, Ms. Divenere, that you've testified was the  
10 result of threats and coercion, being used to  
11 paint Ms. Heard as a liar with respect to her  
12 domestic violence allegations?  
13 MS. VASQUEZ: Same objections.  
14 THE WITNESS: Well, I don't love it.  
15 I'm not sure how I'm supposed to respond to that.  
16 I mean --  
17 BY MR. ROTTENBORN:  
18 Q. Just tell me how you feel.  
19 MS. VASQUEZ: Is there a question?  
20 BY MR. ROTTENBORN:  
21 Q. Just tell me how you feel.  
22 A. Okay.

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1 MS. VASQUEZ: Objection, vague.  
2 THE WITNESS: I've -- I've never -- I  
3 mean, from -- from my personal experience with  
4 Amber, there was never a reason for me to  
5 disbelieve her, if that's what you're asking.  
6 BY MR. ROTTENBORN:  
7 Q. And is it okay with you that this  
8 Declaration has been used in social media posts to  
9 suggest that Ms. Heard is a liar?  
10 MS. VASQUEZ: Objection. Assumes facts  
11 not in evidence.  
12 THE WITNESS: No.  
13 BY MR. ROTTENBORN:  
14 Q. Do you feel like you were misled into  
15 signing this Declaration about what --  
16 MS. VASQUEZ: Objection, vague. I'm  
17 sorry. I apologize, Ben.  
18 BY MR. ROTTENBORN:  
19 Q. I'll ask it again.  
20 Do you feel like you were misled into  
21 signing this Declaration?  
22 MS. VASQUEZ: Objection. Vague and

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1 ambiguous. Assumes facts not in evidence.  
2 THE WITNESS: Yes.  
3 BY MR. ROTTENBORN:  
4 Q. And if you had to do it all over again,  
5 Ms. Divenere, would you sign this same  
6 Declaration?  
7 A. No.  
8 Q. Why not?  
9 A. I -- again, I was, you know, completely  
10 naive about so many things apparently. No, I, you  
11 know -- where do I even begin?  
12 MR. SHERMAN: You've answered the  
13 question.  
14 THE WITNESS: Okay. Thank you.  
15 BY MR. ROTTENBORN:  
16 Q. Well, if you have a further answer, you  
17 can -- you can give it.  
18 A. No, I'm good with that.  
19 Q. Other than Mr. Waldman, have you had  
20 communications with anyone on -- representing  
21 Mr. Depp, whether an attorney or anyone else,  
22 relating to this matter?



<p style="text-align: right;">49</p> <p>1 MR. SHERMAN: It's vague as to your use 2 of the term, "representing." I'm not sure if you 3 mean that in, you know, as a lawyer or like an 4 agent or somebody else, so -- 5 MR. ROTTENBORN: We're going to break it 6 down a little. 7 MR. SHERMAN: -- it's vague and 8 ambiguous the way it's phrased. 9 MS. VASQUEZ: I'll join. 10 MR. ROTTENBORN: We're going to break it 11 down a little bit, Lee. 12 BY MR. ROTTENBORN: 13 Q. But as my initial question, 14 Ms. Divenere, have you -- have you communicated 15 with anyone representing or working for Mr. Depp 16 relating to this matter, other than Mr. Waldman? 17 MR. SHERMAN: Vague. You can answer 18 if -- if you follow. 19 MS. VASQUEZ: Join. 20 THE WITNESS: I'm not sure. So any 21 other attorney? 22 BY MR. ROTTENBORN:</p>	<p style="text-align: right;">51</p> <p>1 MR. SHERMAN: Overbroad. 2 MS. VASQUEZ: Objection. Vague and 3 ambiguous. Lacks foundation. Calls for hearsay. 4 THE WITNESS: I -- I don't know. Can 5 you repeat the question? Sorry. 6 BY MR. ROTTENBORN: 7 Q. Yeah. Just tell -- tell me about your 8 communications with Mr. Murphy relating to this 9 dispute, or allegations -- 10 MS. VASQUEZ: Same -- same objections. 11 THE WITNESS: He had contacted me 12 almost -- quite honestly, very soon after I heard 13 from Mr. Waldman, which caught me by surprise, 14 but, again, I've kept my friendship up with him. 15 You know, we would touch base every once in a 16 while. 17 And he kind of just was -- I was under 18 the impression that he was guiding me and helping 19 me understand what it was that Mr. Waldman was 20 requesting. 21 BY MR. ROTTENBORN: 22 Q. And what did he say to you and what did</p>
<p style="text-align: right;">50</p> <p>1 Q. No, just anyone working for Mr. Depp 2 about this matter. 3 MR. SHERMAN: Okay. It -- okay. It's 4 still vague and it lacks foundation. If you have 5 an answer, you understand, you can answer. 6 THE WITNESS: Yes. 7 BY MR. ROTTENBORN: 8 Q. And who -- who is that? 9 A. Kevin Murphy. 10 Q. Who is Kevin Murphy? 11 A. He had worked with Johnny, and he was 12 the person that I usually had a lot of direction, 13 as far as, you know, things that might need to be 14 done. And I maintained my friendship with him 15 after -- after the divorce -- or not -- well, 16 after they broke up, whenever that might be. 17 Q. Was he Mr. Depp's house manager? 18 A. Yes. 19 MS. VASQUEZ: Objection, leading. 20 BY MR. ROTTENBORN: 21 Q. And just detail for me your 22 communications with Mr. Murphy about this dispute.</p>	<p style="text-align: right;">52</p> <p>1 you say -- or let's break it down. 2 What did -- what specifically, if you 3 recall, did Mr. Murphy say to you about what 4 Mr. Waldman was requesting? 5 MS. VASQUEZ: Objection. Calls for 6 hearsay. 7 MR. SHERMAN: Also overbroad and 8 compound, but you can answer. 9 THE WITNESS: I'm trying to recall 10 again, but he was -- he was just mentioning that, 11 you know, it was a good thing that -- because 12 after I had received that text from Mr. Waldman, I 13 literally looked up into my calendar that showed 14 that I wasn't in Africa at that time. I was also 15 moving, as well, so I had a lot going on during 16 that -- that time. 17 And he said it was a good thing, you 18 know, that -- that I had literally explained to 19 him that I wasn't trying to mislead Mr. Waldman; 20 that, you know, that -- that I went ahead and -- 21 and -- and addressed him. 22 And then he literally said it was kind</p>