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**CONTAINS CONFIDENTIAL INFORMATION
PURSUANT TO THE PROTECTIVE ORDER**

Transcript of Robin Baum

Date: January 20, 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, : Case No.
Plaintiff, : CL-2019-0002911
v. :
AMBER LAURA HEARD, :
Defendant. :

- - - - - x

CONTAINS CONFIDENTIAL INFORMATION

PURSUANT TO THE PROTECTIVE ORDER

Videotaped Deposition of ROBIN BAUM

Conducted Remotely via Zoom

Thursday, January 20, 2022

12:31 p.m. Eastern Time

Job No.: 425537

Pages: 1 - 204

Reported By: AMY L. STRYKER, CCR

1 Videotaped Deposition of ROBIN BAUM,
2 conducted remotely.

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5 Pursuant to subpoena, before AMY L.

6 STRYKER, Certified Court Reporter and Notary

7 Public of the State of Maryland.

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A P P E A R A N C E S

ON BEHALF OF PLAINTIFF JOHN C. DEPP:

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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

3 ON BEHALF OF THE WITNESS:

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5 STALWART LAW GROUP

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9 (310) 954-2000

10

11 ALSO PRESENT:

12 CATHERINE GONZALEZ, AV Technician

13 KIMBERLY JOHNSON, Videographer

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CONTAINS CONFIDENTIAL INFORMATION - PTTPO

Transcript of Robin Baum

Conducted on January 20, 2022

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1	part of the record.)	14:19:52
2	A I think the writer's -- sorry. I think	14:20:06
3	the writer's intention was to write a negative	14:20:10
4	article.	14:20:13
5	Q Thank you.	14:20:16
6	MR. PRESIADO: Can we take a one-second	14:20:18
7	break? I got an e-mail that I need to return.	14:20:19
8	Just a couple minutes.	14:20:22
9	MS. PINTADO: Sure.	14:20:24
10	MR. PRESIADO: Thanks.	14:20:24
11	MS. PINTADO: Off the record.	14:20:25
12	THE VIDEOGRAPHER: Off the record at 2:20.	14:20:25
13	(Recess was held.)	14:23:31
14	THE VIDEOGRAPHER: Back on the record at	14:23:31
15	2:23.	14:23:36
16	BY MS. PINTADO:	14:23:38
17	Q Ms. Baum, did you attempt any damage	14:23:39
18	control after the Rolling Stone article was	14:23:40
19	published?	14:23:44
20	MR. PRESIADO: Objection; vague and	14:23:46
21	ambiguous, assumes facts not in evidence.	14:23:49
22	THE WITNESS: I don't -- I just -- I don't	14:23:53

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1	recall.	14:23:55
2	Q Okay.	14:23:55
3	MS. PINTADO: We can take this exhibit	14:23:58
4	down.	14:24:00
5	Q Do you know who Gregg Brooks is?	14:24:03
6	A Yes.	14:24:05
7	Q Who is Gregg Brooks?	14:24:09
8	A I don't -- I know he was associated with	14:24:11
9	City of Lies, and I do -- I don't remember -- I	14:24:16
10	don't -- I can't think of exactly what his job	14:24:19
11	responsibility was at the moment for some reason.	14:24:23
12	Q Did Ms. -- did Mr. Brooks sue Mr. Depp?	14:24:25
13	A Yes.	14:24:32
14	Q What did he sue him about?	14:24:35
15	A He sued him over --	14:24:39
16	MS. HOUCK: Objection; calls for	14:24:42
17	speculation.	14:24:44
18	Q What do you recall about the litigation?	14:24:46
19	A I'm completely paraphrasing, but I --	14:24:47
20	he -- he sued him over some altercation on set.	14:24:57
21	Q Do you recall that there was an allegation	14:24:59
22	that Mr. Depp punched him in the ribs twice?	14:25:05

1	A I remember -- I recall that that's what he	14:25:08
2	claims.	14:25:17
3	Q Did that allegation have any impact on	14:25:18
4	Mr. Depp's reputation?	14:25:24
5	MR. PRESIADO: Objection; calls for	14:25:27
6	speculation, lacks foundation, and may -- and to	14:25:28
7	the extent it calls for opinion testimony.	14:25:33
8	MS. HOUCK: Join.	14:25:37
9	THE WITNESS: I believe that someone	14:25:49
10	related to the movie publicly denied that that	14:25:51
11	happened.	14:25:58
12	Q At the time -- at the time that he --	14:26:00
13	Mr. Depp was sued by Mr. Brooks, did that story --	14:26:05
14	sorry. Excuse me -- did that lawsuit impact	14:26:12
15	Mr. Depp's career in any way?	14:26:16
16	MR. PRESIADO: Objection; lacks	14:26:18
17	foundation, calls for speculation, vague and	14:26:19
18	ambiguous, and object to the extent it calls for	14:26:22
19	expert opinion.	14:26:24
20	MS. HOUCK: Join.	14:26:25
21	THE WITNESS: I am pretty sure that that	14:26:37
22	lawsuit was after Amber's allegations against him.	14:26:41

1 Q Okay. And what does that mean? 14:26:51

2 A I don't believe that this -- this -- I 14:26:55

3 don't believe -- I'm speaking for myself. I don't 14:27:06

4 think that this lawsuit did any further damage 14:27:09

5 than what her allegations have done. 14:27:16

6 Q Okay. Her allegations prior to this 14:27:23

7 lawsuit? 14:27:28

8 A Correct. 14:27:29

9 Q And had -- those allegations that were 14:27:35

10 involved with the divorce proceedings and the 14:27:38

11 domestic violence order, had those done damage to 14:27:41

12 Mr. Depp's reputation and career? 14:27:45

13 A Yes. 14:27:47

14 Q And would -- strike that. 14:27:47

15 Would another allegation of violence 14:28:03

16 impact that in any way? 14:28:07

17 MR. PRESIADO: Objection; calls for 14:28:09

18 speculation, lacks foundation, vague and 14:28:10

19 ambiguous. 14:28:13

20 MS. HOUCK: Join. 14:28:13

21 THE WITNESS: I'm not -- I'm not sure what 14:28:19

22 the question is. 14:28:22

1 Q Mr. Brooks was alleging violence by 14:28:23
2 Mr. Depp, correct, in his -- in his lawsuit? 14:28:28
3 A Yes. 14:28:32
4 Q Would that have any impact at all on 14:28:33
5 Mr. Depp's reputation? 14:28:40
6 MR. PRESIADO: Objection; calls for 14:28:42
7 speculation, lacks foundation. 14:28:44
8 MS. HOUCK: Join. 14:28:46
9 MR. PRESIADO: Asked and answered. 14:28:51
10 THE WITNESS: I -- I'm speaking for 14:28:52
11 myself. I don't believe it did any further 14:28:54
12 damage. And I believe that at the time prior to 14:28:57
13 the lawsuit, somebody involved with the film 14:29:02
14 denied that the incident happened -- 14:29:08
15 Q That's not what I'm asking. 14:29:11
16 A -- in the press. 14:29:12
17 Sorry. 14:29:16
18 Q That's okay. 14:29:17
19 MS. PINTADO: Exhibit 11. 14:29:19
20 AV TECHNICIAN: Please stand by. 14:29:19
21 (Exhibit 6, Variety article, was marked 14:29:46
22 for identification and is attached to the 14:29:46

1	transcript.)	14:29:48
2	AV TECHNICIAN: Exhibit 6.	14:29:48
3	BY MS. PINTADO:	14:29:51
4	Q Ms. Baum, do you recall seeing this	14:29:51
5	article?	14:29:52
6	MR. PRESIADO: Objection; vague and	14:29:56
7	ambiguous, lacks authentication.	14:30:02
8	Does it say anywhere on there where it's	14:30:05
9	from?	14:30:08
10	MS. PINTADO: I'm asking her if she's ever	14:30:10
11	seen it.	14:30:12
12	MR. PRESIADO: Okay. Vague and ambiguous.	14:30:13
13	THE WITNESS: I -- I'm sure I saw it at	14:30:17
14	the time. I just can't give you a hundred percent	14:30:18
15	that I saw this particular article.	14:30:21
16	Q But you saw other articles about the --	14:30:25
17	let me rephrase that.	14:30:29
18	You at least saw some article about	14:30:31
19	Mr. Depp's location manager, punching him?	14:30:36
20	A Yes.	14:30:39
21	Q Punching the location manager.	14:30:40
22	And was there a large amount of --	14:30:46

1	MR. PRESIADO: Well, allegedly. So I	14:30:50
2	would say misstates testimony, assumes facts not	14:30:54
3	in evidence.	14:30:58
4	BY MS. PINTADO:	14:31:02
5	Q Was this story picked up by the press?	14:31:02
6	A Yes.	14:31:05
7	Q Was there a lot of press around this	14:31:06
8	story?	14:31:11
9	A I believe so.	14:31:11
10	MS. PINTADO: Let's look at Exhibit 12.	14:31:21
11	(Exhibit 7, GQ article, Bates Nos. F1156	14:31:28
12	through F1171, was marked for identification and	14:31:28
13	is attached to the transcript.)	14:31:44
14	AV TECHNICIAN: Exhibit 7.	14:31:44
15	Q And this exhibit is 16 pages. You can	14:31:47
16	look through it for a moment.	14:31:54
17	A I can't get it -- oh, there we go.	14:32:10
18	Q And I'll direct your attention to the	14:32:18
19	bottom of the page here. It says GQ.CO.UK?	14:32:20
20	A Yeah.	14:32:29
21	Do you want me to read the entire thing?	14:32:29
22	Q No. Do you recall seeing this article?	14:32:31

1 MR. PRESIADO: Objection; vague and 14:45:11
2 ambiguous. 14:45:13
3 MS. HOUCK: Join. 14:45:13
4 THE WITNESS: I would be speculating. I 14:45:14
5 don't -- I don't -- I don't remember how much 14:45:16
6 press. 14:45:19
7 BY MS. PINTADO: 14:45:20
8 Q Okay. 14:45:20
9 MS. PINTADO: Let's look at Exhibit 13. 14:45:29
10 AV TECHNICIAN: Stand by. 14:45:35
11 (Exhibit 8, Royal Courts of Justice 14:45:37
12 Approved Judgment, was marked for identification 14:45:37
13 and is attached to the transcript.) 14:45:50
14 AV TECHNICIAN: Exhibit 8. 14:45:50
15 Q Ms. Baum, do you remember that -- do you 14:45:53
16 recall when the judgment was issued in the U.K. 14:46:07
17 regarding the litigation involving The Sun and 14:46:10
18 Mr. Wootton? 14:46:14
19 A Do I remember when the -- they made -- 14:46:17
20 when they ruled again -- when they made the 14:46:22
21 judgment? Is that what you're asking me? 14:46:26
22 Q Yes. 14:46:30

1 A **Yes.** 14:46:30

2 Q Okay. And when was that? 14:46:31

3 A **I think -- I don't remember the year. But** 14:46:33

4 **it -- was it in November, October?** 14:46:36

5 Q **I'll represent to you that it was in** 14:46:39

6 **November of 2020.** 14:46:42

7 And what -- what is your understanding 14:46:46

8 of -- strike that. 14:46:55

9 **Did the judgment receive publicity?** 14:46:57

10 MR. PRESIADO: Objection; vague and 14:47:03

11 ambiguous. That's it. 14:47:04

12 MS. HOUCK: Join. 14:47:11

13 THE WITNESS: **Yes.** 14:47:12

14 Q **And what do you mean by publicity?** 14:47:13

15 A **Well, the press reported.** 14:47:17

16 Q **Would you say it generated a lot of** 14:47:22

17 **publicity?** 14:47:26

18 MS. HOUCK: Objection; vague and 14:47:32

19 ambiguous. 14:47:34

20 MR. PRESIADO: Vague and ambiguous as to 14:47:34

21 publicity where, so... Just in general, global, 14:47:35

22 in the U.K.? 14:47:41

1 THE WITNESS: I would say it got a lot of 14:47:44
2 press. 14:47:47
3 BY MS. PINTADO: 14:47:47
4 Q Did it get a lot of press in the U.K.? 14:47:47
5 A I don't live in the U.K., so I don't know 14:47:51
6 specifically -- 14:47:56
7 Q Did it get a lot of -- 14:47:59
8 A -- the amount. 14:48:01
9 Q Okay. Did it get a lot of press in the 14:48:02
10 U.S.? 14:48:04
11 A It got a lot -- yeah, it got covered in 14:48:04
12 all the -- in the press. 14:48:07
13 Q Where in the press, do you remember? 14:48:10
14 A What specific outlets? 14:48:13
15 Q Yes. If you recall. 14:48:19
16 A I -- I mean, I -- I couldn't list you all 14:48:26
17 the outlets that it ran in. I -- I -- I -- but it 14:48:29
18 ran in a majority amount of press. 14:48:33
19 Q Okay. And would you characterize that 14:48:40
20 press as negative or positive for Mr. Depp? 14:48:43
21 MS. HOUCK: Objection; vague and 14:48:51
22 ambiguous. 14:48:52

1 MR. PRESIADO: Objection; lacks 14:48:52
2 foundation, calls for speculation. And object to 14:48:55
3 the extent it calls for expert opinion. 14:48:58
4 THE WITNESS: **I would say it was not** 14:49:02
5 **positive.** 14:49:04
6 BY MS. PINTADO: 14:49:04
7 Q **Do you know if Mr. Depp lost any roles as** 14:49:04
8 **a result of the judgment?** 14:49:13
9 MR. PRESIADO: Objection; lacks 14:49:16
10 foundation, calls for speculation. 14:49:17
11 MS. HOUCK: Join. 14:49:20
12 THE WITNESS: **I -- I believe it's my -- I** 14:49:20
13 **mean, it's my understanding that he lost the** 14:49:26
14 **Fantastic Beasts, maybe, he was supposed to do.** 14:49:29
15 Q Did your role as publicist change after 14:49:34
16 the filing of the lawsuit -- sorry, after the 14:49:43
17 judgment? 14:49:45
18 A No. I don't know what you mean by that, 14:49:45
19 though. 14:49:55
20 Q Did your work change in any way? 14:49:56
21 MS. HOUCK: Objection; vague and 14:50:05
22 ambiguous. 14:50:13

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<p style="text-align: right;">137</p> <p>1 MR. PRESIADO: Also assumes facts not in 2 evidence. 3 BY MS. PINTADO: 4 Q You can go ahead, Ms. Baum. 5 A Are you wanting me to answer that 6 question? 7 Q Yes. 8 A I have no -- I mean, I -- probably a 9 combination. 10 Q Okay. And did you do anything to verify 11 statements of Adam Waldman when you received them? 12 A No. Adam Waldman gave me statements and 13 told me to send them from him so they say they're 14 from him. 15 Q And when did you start -- when did Adam 16 Waldman start participating in the publicity of 17 Mr. Depp? 18 MR. PRESIADO: Objection; misstates 19 testimony, assumes facts not in evidence, vague 20 and ambiguous. 21 MS. HOUCK: Calls for speculation. 22 MR. PRESIADO: Join.</p>	<p style="text-align: right;">139</p> <p>1 MS. PINTADO: And I would once again note 2 that there is no privilege that can be applied to 3 those communications. Ms. Baum is not an attorney 4 and is a third party. 5 So please go ahead and answer unless 6 you're directed not to, in which case we might 7 have to come back for another day. 8 MR. PRESIADO: And I don't agree with 9 that. But our position is on the record. 10 MS. HOUCK: Right. There is a dispute, 11 obviously, but we will respect the privilege 12 that's being held by Mr. Depp. 13 So can we have the question again. 14 THE REPORTER: Do you want me to read it 15 back? 16 MS. PINTADO: Yes, please. 17 THE REPORTER: Stand by. What was the 18 person's name? Wald-? 19 MS. PINTADO: Waldman. 20 (The court reporter read the pertinent 21 part of the record.) 22 MR. PRESIADO: Same objections.</p>
<p style="text-align: right;">138</p> <p>1 THE WITNESS: I don't know. I don't know 2 exactly. I couldn't give you a date or a year. 3 BY MS. PINTADO: 4 Q What was Mr. Waldman's role in publicity 5 for Mr. Depp? 6 MR. PRESIADO: Objection; calls for 7 speculation, assumes facts not in evidence, lacks 8 foundation. 9 And, Ms. Baum, I would caution you in 10 course -- of course, in con- -- in consult with 11 your attorney, I would caution you not to divulge 12 any communications you've had with Mr. Waldman, 13 him being an attorney for Mr. Depp and you being 14 an agent of Mr. Depp. 15 MS. HOUCK: I concur. 16 MR. PRESIADO: So if the question is posed 17 and you can't -- and you believe you can't 18 answer -- answer without divulging such 19 communications, of course your attorney would have 20 to instruct you not to answer. But as the 21 attorney for Mr. Depp who holds the privilege, I 22 would ask you not answer.</p>	<p style="text-align: right;">140</p> <p>1 MS. PINTADO: And -- yeah. I understand 2 that those are standing objections. We don't need 3 to state them every time. 4 THE WITNESS: Well, I could just say that 5 Adam Waldman was Johnny -- or was the -- Johnny's 6 attorney and provided me with statements. 7 BY MS. PINTADO: 8 Q Would you say he had an active role in 9 publicity for Mr. Depp? 10 MR. PRESIADO: Objection -- 11 MS. HOUCK: Objection. 12 MR. PRESIADO: -- calls for speculation, 13 lacks foundation, assumes facts not in evidence, 14 vague and ambiguous. 15 MS. HOUCK: Join. 16 MR. PRESIADO: Also to the extent it calls 17 for a legal conclusion. 18 BY MS. PINTADO: 19 Q Ms. Baum, you can answer. 20 A I'm still confused. Am I supposed to 21 answer or not supposed to answer? 22 MS. HOUCK: Yes, you can answer. Unless I</p>

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145	<p>1 Mr. Depp's counsel. So if you could limit your 2 answer, if you have one, to communications where 3 Mr. Waldman was not involved. 4 MS. HOUCK: I agree. 5 THE WITNESS: You're saying I should 6 limit -- repeat that last thing you said to me. 7 MR. PRESIADO: Sure. So she's asking you 8 about communications between you and Mr. Depp. 9 THE WITNESS: Yeah. 10 MR. PRESIADO: But if you had those 11 communications with Mr. Waldman present, then 12 they're privileged and I would ask you not to 13 answer that. 14 But if it's just between you and 15 Mr. Depp -- if, in fact, those conversations were 16 ever had -- please limit your answer to those 17 conversations that did not include Mr. Waldman. 18 THE WITNESS: Okay. 19 I did not have conversations with 20 Mr. Depp. 21 BY MS. PINTADO: 22 Q Did you ever disagree with any of the</p>	147	<p>1 object to any of the statements? 2 MR. PRESIADO: Objection; vague and 3 ambiguous, assumes facts not in evidence. 4 MS. HOUCK: And compound to the extent 5 that it's multiple statements. I don't know which 6 ones you're talking about. 7 THE WITNESS: I -- I -- sorry. The words 8 just flew out of my head. 9 BY MS. PINTADO: 10 Q Let -- 11 A I did -- I trusted Mr. Adam's direction -- 12 Mr. Waldman's direction. 13 Q Were you asked by Mr. Depp to publish 14 statements that Mr. Waldman gave to you? 15 MR. PRESIADO: Again, Ms. Baum, I caution 16 you to not reveal any communications that 17 Mr. Waldman was present or party to even though 18 she's just asking you about you and Mr. Depp. 19 THE WITNESS: I did not speak to Mr. Depp. 20 Q Okay. And did you speak with Mr. Waldman 21 about any of the statements that he was asking you 22 to send to the press?</p>
146	<p>1 statements that you were putting out from 2 Mr. Waldman? 3 MR. PRESIADO: And, again, Ms. Baum, if 4 that was a communication between you and 5 Mr. Waldman, I would -- 6 MS. PINTADO: I'm not -- 7 MR. PRESIADO: -- ask that you not answer 8 that. 9 MS. PINTADO: I'm not referring to 10 communications, for now, with Mr. Waldman -- 11 MR. PRESIADO: That's not -- 12 MS. PINTADO: -- although I object to 13 that. 14 MR. PRESIADO: Then you need to clarify 15 your question. 16 BY MS. PINTADO: 17 Q Ms. Baum, did you understand the question? 18 A I think you're asking me if I ever 19 objected to the statements. Are you asking me if 20 I objected to the statements or objected them -- 21 to Adam Waldman? 22 Q Not -- not to Adam Waldman. Just, did you</p>	148	<p>1 MR. PRESIADO: Objection; calls for 2 attorney-client communications. 3 And I would ask that you not answer that 4 question on -- since Mr. Depp asserts the 5 privilege as to that question. 6 MS. HOUCK: Join in the objection. 7 And I'll instruct you not to answer that, 8 Ms. Baum. 9 THE WITNESS: Okay. 10 MS. PINTADO: All right. Let's look at 11 27. 12 (Exhibit 18, Chain of e-mails dated 13 12/18/14, Bates Nos. BAUM0000404 through 14 BAUM0000409, was marked for identification and is 15 attached to the transcript.) 16 AV TECHNICIAN: Exhibit 18. 17 BY MS. PINTADO: 18 Q And this is BAUM 404 -- well, it starts as 19 that. It's a six-page document. 20 A A six-page. Okay. 21 Q And on this first page -- if you could -- 22 if you could just read the first page for me</p>

149	<p>1 and -- or skim the document, and then let me know</p> <p>2 if you understand -- or, sorry, recognize this</p> <p>3 document.</p> <p>4 A I can't move it down.</p> <p>5 Q I'll do it for you.</p> <p>6 A Thank you.</p> <p>7 Q Ms. Baum, what is this document?</p> <p>8 A Well, it's -- it's a letter from somebody</p> <p>9 who works from -- at the National -- National</p> <p>10 Enquirer, asking for comment.</p> <p>11 Q And they're asking for a comment about a</p> <p>12 story that Depp has turned his place into a "rehab</p> <p>13 retreat"; isn't that right?</p> <p>14 A Yeah, that's what it --</p> <p>15 MR. PRESIADO: Objection; the document</p> <p>16 speaks for itself.</p> <p>17 THE WITNESS: Yeah, that's what the</p> <p>18 document says.</p> <p>19 Q And this is December 18, 2014, correct?</p> <p>20 A Correct.</p> <p>21 Q And scrolling back up, Ms. Gonzalez at the</p> <p>22 National Enquirer sends you an additional -- an</p>	151	<p>1 Q So at this time, at least, in December of</p> <p>2 2014, you were working as a partner with</p> <p>3 Ms. Dembrowski?</p> <p>4 MS. HOUCK: Objection; lacks foundation,</p> <p>5 assumes facts --</p> <p>6 MR. PRESIADO: Also misstates testimony.</p> <p>7 Q You can answer, Ms. Baum.</p> <p>8 A I -- yeah, I mean, I -- I -- yes, I worked</p> <p>9 with Christi.</p> <p>10 Q Okay.</p> <p>11 THE WITNESS: Can I -- excuse me. Can I</p> <p>12 pause for one second? It's just that the sun has</p> <p>13 changed and it's very bright and I'm having a hard</p> <p>14 time seeing, so...</p> <p>15 Okay. Thank you.</p> <p>16 MS. PINTADO: Okay.</p> <p>17 Let's pull up 28.</p> <p>18 (Exhibit 19, Chain of e-mails dated</p> <p>19 3/11/15 and 3/12/15 with attachments, Bates Nos.</p> <p>20 BAUM0000661 through BAUM0000683, was marked for</p> <p>21 identification and is attached to the transcript.)</p> <p>22 AV TECHNICIAN: Exhibit 19.</p>
150	<p>1 addition to the comment request sent earlier.</p> <p>2 And you forward this e-mail -- these</p> <p>3 e-mails from Ms. Gonzalez to Christi Dembrowski,</p> <p>4 correct?</p> <p>5 A Yeah, that's what it looks like.</p> <p>6 Q Did you not want to respond to this press</p> <p>7 inquiry?</p> <p>8 A Well, I don't -- I don't recall whether I</p> <p>9 did or I did not, but I don't make a habit of</p> <p>10 responding on any of my clients' behalf to the</p> <p>11 National Enquirer.</p> <p>12 Q Was it true that Depp was in rehab?</p> <p>13 MR. PRESIADO: Objection; calls for --</p> <p>14 lacks foundation, calls for speculation.</p> <p>15 THE WITNESS: I don't know.</p> <p>16 Q And why did you forward it to</p> <p>17 Ms. Dembrowski?</p> <p>18 A At the time, I included her in everything.</p> <p>19 Q Why is that?</p> <p>20 A Well, she was -- she was my partner who I,</p> <p>21 you know, worked on -- for years on Johnny's</p> <p>22 behalf.</p>	152	<p>1 BY MS. PINTADO:</p> <p>2 Q Okay. And I will scroll through it. It's</p> <p>3 23 pages.</p> <p>4 A Sorry.</p> <p>5 Q Are you -- let me know when I'm -- I can</p> <p>6 scroll.</p> <p>7 A You can scroll.</p> <p>8 Q I'm going to go back up to the top of this</p> <p>9 document. If you need to review any other parts</p> <p>10 of it, let me know.</p> <p>11 A Okay.</p> <p>12 Q Do you recognize this document?</p> <p>13 A Yes.</p> <p>14 Q What is it?</p> <p>15 A It was a document that the unit publicist</p> <p>16 on the film had -- an e-mail that the unit</p> <p>17 publicist from the film had sent to me.</p> <p>18 Q So Michael Singer is the publicist on the</p> <p>19 film?</p> <p>20 A Yes. He worked for Jerry Bruckheimer.</p> <p>21 Q Okay. And what company was that?</p> <p>22 And I apologize for the sirens in the</p>