

Transcript of Ronald S. Schnell
Conducted on March 16, 2022

<p style="text-align: center;">1</p> <p>1 VIRGINIA:</p> <p>2 IN THE CIRCUIT COURT FOR FAIRFAX COUNTY</p> <p>3</p> <p>4 ----- x</p> <p>5 JOHN C. DEPP, II, :</p> <p>6 Plaintiff, : Case No.</p> <p>7 v. : CL-2019-0002911</p> <p>8 AMBER LAURA HEARD, :</p> <p>9 Defendant. :</p> <p>10 ----- x</p> <p>11</p> <p>12 Videotaped Deposition of RONALD S. SCHNELL</p> <p>13 Conducted Remotely via Zoom</p> <p>14 Wednesday, March 16, 2022</p> <p>15 9:59 a.m.</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20 Job No.: 439258</p> <p>21 Pages: 1 - 128</p> <p>22 Reported By: AMY L. STRYKER, CCR</p>	<p style="text-align: center;">3</p> <p style="text-align: center;">A P P E A R A N C E S</p> <p>1</p> <p>2</p> <p>3 ON BEHALF OF PLAINTIFF JOHN C. DEPP, II:</p> <p>4 ANDREW C. CRAWFORD, ESQ.</p> <p>5 BROWN RUDNICK LLP</p> <p>6 601 Thirteenth Street, NW</p> <p>7 Suite 600</p> <p>8 Washington, D.C. 20005</p> <p>9 (202) 536-1785</p> <p>10</p> <p>11 ON BEHALF OF DEFENDANT AMBER LAURA HEARD:</p> <p>12 ADAM NADELHAFT, ESQ.</p> <p>13 ELAINE CHARLSON BREDEHOFT, ESQ.</p> <p>14 CHARLSON BREDEHOFT COHEN BROWN</p> <p>15 & NADELHAFT, P.C.</p> <p>16 11260 Roger Bacon Drive</p> <p>17 Suite 201</p> <p>18 Reston, Virginia 20190</p> <p>19 (703) 318-6800</p> <p>20 ALSO PRESENT:</p> <p>21 CATHERINE GONZALEZ, AV Technician</p> <p>22 BRENDAN CASE, Videographer</p>																										
<p style="text-align: center;">2</p> <p>1 Deposition of RONALD S. SCHNELL, conducted</p> <p>2 remotely.</p> <p>3</p> <p>4</p> <p>5 Pursuant to notice, before AMY L. STRYKER,</p> <p>6 Certified Court Reporter and Notary Public of the</p> <p>7 State of Maryland.</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</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 style="text-align: center;">4</p> <p style="text-align: center;">C O N T E N T S</p> <table border="0"> <tr> <td>2 EXAMINATION OF RONALD S. SCHNELL</td> <td style="text-align: right;">PAGE</td> </tr> <tr> <td>3 By Mr. Crawford</td> <td style="text-align: right;">6</td> </tr> </table> <table border="0"> <tr> <td colspan="2" style="text-align: center;">E X H I B I T S</td> </tr> <tr> <td colspan="2" style="text-align: center;">(Attached to transcript.)</td> </tr> </table> <table border="0"> <tr> <td>6 SCHNELL DEPOSITION EXHIBITS</td> <td></td> </tr> <tr> <td>7 Schnell 1 Mr. Schnell's CV</td> <td style="text-align: right;">10</td> </tr> <tr> <td>8 Schnell 3 Counterclaim Plaintiff and</td> <td></td> </tr> <tr> <td>9 Defendant's Third</td> <td></td> </tr> <tr> <td>10 Supplemental and Rebuttal</td> <td></td> </tr> <tr> <td>11 Disclosure of Expert</td> <td></td> </tr> <tr> <td>12 Witnesses</td> <td></td> </tr> <tr> <td>11 Schnell 2 Counterclaim</td> <td style="text-align: right;">32</td> </tr> <tr> <td>12 Schnell 5 Hashtag Comparison</td> <td style="text-align: right;">90</td> </tr> </table> <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>	2 EXAMINATION OF RONALD S. SCHNELL	PAGE	3 By Mr. Crawford	6	E X H I B I T S		(Attached to transcript.)		6 SCHNELL DEPOSITION EXHIBITS		7 Schnell 1 Mr. Schnell's CV	10	8 Schnell 3 Counterclaim Plaintiff and		9 Defendant's Third		10 Supplemental and Rebuttal		11 Disclosure of Expert		12 Witnesses		11 Schnell 2 Counterclaim	32	12 Schnell 5 Hashtag Comparison	90
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<p style="text-align: right;">25</p> <p>1 data and found that there were a large number of 2 screen names that produced the negative tweets. 3 I thought it would be best to then request 4 that counsel subpoena Twitter to get more 5 information about these many screen names so that 6 I could get things like IP addresses to further 7 inform my opinion about whether I could say 8 with -- you know, with certainty that these were 9 bots. I have not received any results from 10 Twitter at this time, so I thought it prudent to 11 not -- to not opine about bots at this time 12 because I just wanted to close that one last loop. 13 MR. CRAWFORD: Ms. Gonzalez, can we 14 quickly pull up Exhibit 3, please. 15 AV TECHNICIAN: Please stand by. 16 (Schnell 3, Counterclaim Plaintiff and 17 Defendant's Third Supplemental and Rebuttal 18 Disclosure of Expert Witnesses, was marked for 19 identification and is attached to the transcript.) 20 AV TECHNICIAN: Exhibit 3. 21 Q Mr. Schnell, do you recognize this 22 document?</p>	<p style="text-align: right;">27</p> <p>1 suspected I had with her. 2 Q Okay. 3 MR. CRAWFORD: And, Ms. Gonzalez, can we 4 go down to page 38, please. 5 Q And, Mr. Schnell, directing your attention 6 about kind of near the top there, about a third of 7 the way down, Mr. Schnell has identified these 8 tweet patterns as an orchestrated "bot" campaign 9 by Depp and his representatives that is triggered 10 by statements in the press by or about Ms. Heard. 11 I believe you just told me you did not 12 feel it was appropriate to opine that bots were 13 involved in this. So could you please explain to 14 me that statement in Ms. Arnold's report. 15 A I can only speak to what my opinions at 16 trial will be. I'm not sure I said -- I'm not 17 sure exactly what I said in terms of appropriate 18 or not appropriate. I did find many screen names 19 that had an extraordinarily high bot score. I 20 don't intend to testify at trial about any opinion 21 relating to bots. 22 MR. CRAWFORD: Okay. Ms. Gonzalez, let's</p>
<p style="text-align: right;">26</p> <p>1 A Yes. I actually have a copy of pages 26 2 to 34 next to me, otherwise unmarked. 3 Q Okay. 4 MR. CRAWFORD: Ms. Gonzalez, could we go 5 to page 35, please. 6 Q Mr. Schnell, do you know who Kathryn 7 Arnold is? 8 A From reading this document, I do, yes. 9 Q And have you communicated with Ms. Arnold? 10 A I don't -- I don't recall if I did or not. 11 I may have -- I may have had one call with counsel 12 present with her, but I'm not even certain of 13 that. 14 MR. CRAWFORD: Ms. Gonzalez, can we go 15 down to page 38, please -- or, excuse me, page 37. 16 And the bottom, please. 17 Q Mr. Schnell, directing your attention to 18 that last paragraph there, Ms. Arnold has also 19 consulted with Ron Schnell. 20 Does that refresh your recollection as to 21 whether you consulted with her? 22 A Yes. That must be the one call I</p>	<p style="text-align: right;">28</p> <p>1 take this down for one sec. 2 BY MR. CRAWFORD: 3 Q Mr. Schnell, I'd like to unpack that a 4 little bit and -- just kind of going back to your 5 conversation. I think you said you used a 6 well-known algorithm to see if there's potential 7 bot activity; is that correct? 8 A That's correct. 9 Q Is there a name of the algorithm? 10 A There is. I'd -- I'll have to look it up 11 to remember. It's from -- it's from a major 12 university somewhere in the Midwest. I'll have to 13 look up the name of it. But I'll definitely do 14 that. 15 Q Okay. And can you describe generally how 16 the algorithm works. 17 A Yes. It -- given a screen name it looks 18 at a complete history of the Twitter activity of 19 that screen name. It also looks at things like 20 numbers of followers, numbers of people followed, 21 you know, certain keywords within tweets. It's an 22 artificial intelligence/machine learning</p>

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1 I'm just curious, is there a way to search
2 for hashtags on Twitter without using one of the
3 Twitter APIs?
4 **A Not reliably, no.**
5 Q Yeah. Okay.
6 All right. So continuing on about halfway
7 down that paragraph, it says, Because of the
8 nature of those searches, Mr. Schnell is expected
9 to testify that it is possible to show that the
10 vast majority of the results contain negative
11 statements about Ms. Heard.
12 We talked about this a little bit earlier.
13 I think you testified that you reviewed several
14 thousand tweets manually; is that correct?
15 **A That's correct.**
16 Q Do you recall more precisely how many?
17 **A 2,000.**
18 Q 2,000. Did you originally use a sentiment
19 analysis tool in --
20 **A I did.**
21 Q -- this assessment?
22 **A I did.**

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1 Q And you decided ultimately not to use that
2 tool; is that correct?
3 **A That is correct.**
4 Q And why was that the case?
5 **A I found it to not be reliable. The**
6 **problem with sentiment analysis tools, with which**
7 **I'm quite familiar, is that they'll only tell you**
8 **whether something is negative, positive, or**
9 **neutral. That's a simplification. It's a little**
10 **more detailed than that.**
11 **But, for example, if you have a tweet with**
12 **a, you know, "#AmberHeardIsAnAbuser," and then it**
13 **says, you know, "JohnnyDeppSucks," or something**
14 **like that, it's going to count it as a negative**
15 **tweet towards Johnny Depp -- I'm sorry, a negative**
16 **tweet towards Amber Heard, potentially. So I**
17 **didn't find that it was a valuable tool in this**
18 **analysis.**
19 Q Okay. And so based on your analysis of
20 the sort of -- the approximately 1 million
21 distinct tweets, did you form an opinion as to how
22 many of those were negative about Ms. Heard?

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1 **A Yes. My opinion is largely all of them.**
2 Q And when you say "largely all of them,"
3 that means not all of them, correct?
4 **A No. It means I couldn't look at all**
5 **1 million-plus tweets with my eyes. So with the**
6 **sampling I took, I wasn't able to find any. So,**
7 **you know, as a scientist I don't -- it's not**
8 **appropriate for me to say all of them, but it's**
9 **quite likely it is all of them. I can say that**
10 **with the 2,000 I looked at with my eyes, it was**
11 **all of them.**
12 Q Okay. And so moving down that next line,
13 Mr. Schnell will also testify that based on the
14 number of negative posts about Ms. Heard during
15 this time on Twitter, a similar magnitude of
16 negative comments would also be published on
17 Instagram and Reddit.
18 So how do you determine what is posted on
19 Instagram and Reddit based on the number of
20 negative posts on Twitter?
21 **A I did look at those other platforms and**
22 **saw, you know, similar patterns. And, again,**

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1 **those hashtags -- it's quite apparent that those**
2 **hashtags are being used in a negative context**
3 **toward Ms. Heard. So considering that I couldn't**
4 **find any that were not, it's safe to say that on**
5 **those other platforms, when people are using those**
6 **hashtags, it will be the same thing.**
7 I should mention that, you know, in the
8 2,000 I looked at on -- from Twitter, the second
9 thousand I looked at more recently in the last
10 couple of weeks, and 16 percent of the users in
11 the sample that I took were either suspended or
12 deleted, so I couldn't actually view those tweets.
13 Q Okay. Did you collect any data from
14 Instagram?
15 **A I didn't collect any data via API, if**
16 **that's what you're asking, from Instagram.**
17 Q Sorry about that. Did you collect -- did
18 you collect data by some other means beyond an
19 API?
20 **A I looked at them. I looked at a sampling**
21 **of posts, Instagram posts and Reddit posts.**
22 Q How big of a sampling did you look at?

<p style="text-align: right;">81</p> <p>1 MR. NADELHAFT: Go ahead. 2 THE WITNESS: Sorry. 3 I didn't collect any specific data from 4 the profile in total on -- but the data that I did 5 collect and supplied to Mr. Depp contains 6 information about each user that created a tweet. 7 BY MR. CRAWFORD: 8 Q And so maybe that was a poorly phrased 9 question. So I'm talking maybe a little bit more 10 broadly about the types of people that use Twitter 11 versus the types of people that use Instagram 12 versus types of people that use Reddit, I mean, 13 are there different types of people? Are there 14 different profiles of people? 15 A I see what you mean. Because the reason I 16 was confused is because the concept of a profile 17 on each of those platforms means something else. 18 Q My apologies. It was a poorly phrased 19 question. 20 A So I'm certain that there is some 21 behavioral difference between the users of the 22 three platforms, but that's not my area of</p>	<p style="text-align: right;">83</p> <p>1 can you describe for me the leading works and peer 2 consultations that you reviewed in connection with 3 this assignment? 4 A So I guess a leading work that I didn't 5 mention at the beginning of this deposition is the 6 article that I couldn't remember the name of, but 7 I gave after this break. That's a scholarly 8 article, as I mentioned. 9 I did consult with peers at BRG about 10 social media in general, but I don't know that 11 I -- I don't -- I will not rely on those in my -- 12 I didn't rely on those for any of my opinions in 13 reality. 14 And the leading works was meant to be 15 relied on if I was going to testify about bot 16 scores, which I'm not. 17 Q Understood. Thank you. 18 MR. CRAWFORD: Excuse me one sec. 19 Sorry about that. 20 THE WITNESS: No worries. 21 MR. CRAWFORD: I'm dealing with a scratchy 22 throat.</p>
<p style="text-align: right;">82</p> <p>1 expertise. I didn't research that. 2 Q Okay. 3 MR. CRAWFORD: Moving down, Ms. Gonzalez, 4 if we can scroll down just a little bit to the 5 paragraph in the middle there. 6 Q Mr. Schnell is expected to testify that 7 there is no way to remove other people's posts 8 from these social media platforms, and therefore 9 the negative posts' impact will always remain and 10 be accessible to the public. 11 Can you just describe briefly what impacts 12 you're referring to. 13 A So I don't mean to be testifying about 14 what the impact is at all, so that may be a 15 misplaced phrase. 16 Q Okay. All right. And jumping down to the 17 next paragraph, it says that your opinion is based 18 on consultation with leading works and peer 19 consultations. 20 At the outset we discussed some of the 21 documents that you reviewed. I think you 22 mentioned you reviewed a few online articles, but</p>	<p style="text-align: right;">84</p> <p>1 All right. Ms. Gonzalez, if we can go 2 down to page 30, please. 3 Q So, Mr. Schnell, looking at that first 4 full paragraph, it says you performed some 5 additional research regarding negative tweets 6 towards Ms. Heard and Mr. Depp. 7 Could you just explain to me sort of what 8 additional research you performed and what this 9 paragraph means. 10 A This paragraph is talking about my use of 11 the second API, which was the counts API I 12 mentioned earlier. It allowed me to broaden my 13 search starting from January 1, 2018 until 14 June 15, 2021 as opposed to before, which was a 15 more narrow date range. That only allowed me to 16 get the counts as opposed to the actual tweets 17 themselves. 18 Q And is there a reason you selected 19 January 1, 2018 through June 15, 2021? 20 A I think the idea was just to go back far 21 enough that it was prior to anything having to do 22 with this case, and I think June 15, 2021 was</p>

<p style="text-align: right;">85</p> <p>1 related to when I performed the search. 2 Q Okay. And you said the number of uses of 3 those hashtags with those dates was 2,790,876. Is 4 that number the number of -- what does that number 5 mean? Is that the number of hashtags -- the 6 number of times the four negative Heard hashtags 7 are used in that date range? 8 A Yes. 9 Q So that's not a distinct number of tweets, 10 that's the number of times the hashtag was used? 11 A Within tweets, yes. 12 Q And that refers -- you said you did 13 research regarding tweets towards Ms. Heard and 14 Mr. Depp. That 2 million number is just hashtags 15 relating to Ms. Heard? 16 A I believe that's correct, yes. 17 Q Okay. Now, the next paragraph you look at 18 six hashtags that reflect negatively on Mr. Depp, 19 correct? 20 A Correct. 21 Q Did you form any opinion as to why there 22 are purportedly more negative tweets about</p>	<p style="text-align: right;">87</p> <p>1 there was a jump from zero for the last many weeks 2 to -- I want to say 15 on one day and these -- I 3 think it was a total of 40 or 41 in the five-day 4 period around August 16th. 5 Q That doesn't seem like a particularly 6 significant increase. Would you agree with that 7 assessment or... 8 A It's a sudden increase when it's been zero 9 for eight months with a couple of notable 10 exceptions of one over a couple of disparate days. 11 So whether or not you consider it 12 statistically significant is a little bit 13 subjective, but it was sudden for certain. 14 Q Okay. Fair enough. 15 MR. CRAWFORD: All right. Could we go 16 down to the last paragraph on page 30. 17 Q It says you're going to testify about your 18 analysis of negative replies to a particular 19 marketing tweet promoting Aquaman 2 from 20 October 16, 2021. 21 MR. CRAWFORD: And maybe, Ms. Gonzalez, if 22 we can jump down to page 31 and take a look at</p>
<p style="text-align: right;">86</p> <p>1 Ms. Heard than there are about Mr. Depp in that 2 period? 3 A No, I was -- I wouldn't be able to form 4 such an opinion, not based on science anyway. 5 Q Okay. Jumping down, Mr. Schnell is 6 expected to testify regarding the use of the 7 particular hashtag #AmberTurd and the sudden 8 increase in the use of this hashtag on or around 9 August 16 and August 17, 2018. 10 Did you form any opinion as to why there 11 was a sudden increase of that hashtag on or around 12 August 16 or 17, 2018? 13 A I did not. I wouldn't be able to do that 14 based on science. 15 Q And can you describe what you mean by a 16 "sudden increase"? 17 A Well, just that it had been between 18 January 1, 2018 and August 16th -- or, really -- 19 yeah, 16, 2018 that there were -- I can't say none 20 because every now and then a handful of times they 21 were used once in a day between January 1, 2018 22 and August 16, 2018. But starting on August 16th,</p>	<p style="text-align: right;">88</p> <p>1 that tweet. 2 Q Mr. Schnell, could you describe your 3 analysis of these -- of the replies to this tweet? 4 A I looked at replies and quote tweets to 5 this tweet and -- in a 24-hour period after it was 6 posted, and found that there were over a hundred 7 of those using the negative hashtags we've been 8 discussing, and these other words I mentioned 9 here, "abuser" and "boycott." 10 Q And you wouldn't form any opinion as to 11 why there was that sudden increase, right? 12 A Yes. 13 Q "Sudden increase" is not the right words. 14 You didn't form any opinion as to why 15 there were that many negative replies to this 16 tweet, correct? 17 A Correct. That would be outside of the 18 scope of what I do. 19 Q Okay. Looking at the second paragraph 20 here, it says again that you will -- you're 21 expected to testify about, you know, the use of 22 the hashtags and the negative posts relating to</p>

<p style="text-align: right;">89</p> <p>1 Ms. Heard, the number of posts per user, the 2 number of users creating such posts, et cetera. 3 Is that referring to the same analysis 4 that we discussed earlier? 5 A That's correct. 6 Q And is this referring to an expanded date 7 range or the same date range of April 2020 through 8 January 31, 2021? 9 A No, this is an expanded – this does talk 10 about the entirety. I don't know that I wasn't 11 talking about that previously, but certainly this 12 is talking about January 1, 2018 to June 15, 2021. 13 Q Okay. It says at the very end of that 14 paragraph that the frequency of such posts are 15 consistent with manipulation and a coordinated 16 effort. 17 Is that a reference to the bot campaign? 18 A I would say the coordinated effort or 19 coordination in general is not related to the bot 20 campaign. So coordination with this – this is 21 talking about – what I intend to testify about is 22 the mathematical coordination or correlation. So</p>	<p style="text-align: right;">91</p> <p>1 Q Mr. Schnell, do you recognize this 2 document? 3 A I do. 4 Q Can you explain what we're looking at 5 here. 6 A So this is a graph that shows by month the 7 number of tweets containing each of these ten 8 hashtags. 9 Q And there are boxes and arrows with 10 certain dates and events listed as well, right? 11 A Correct; they are callouts to certain 12 events and dates. 13 Q Why did you include those? 14 A Why I included these relates to 15 conversation with counsel. If I'm given the okay 16 to answer it, I can. That's what it relates to. 17 MR. NADELHAFT: I mean, you shouldn't -- 18 you shouldn't testify as to communications with 19 counsel. To the extent you can answer this 20 without referring to communications with counsel, 21 you can do that. 22 THE WITNESS: I can't answer this without</p>
<p style="text-align: right;">90</p> <p>1 you can see that all of the hashtags are trending 2 in the same way at the same time, so that's the 3 coordination that I'm talking about. That's a 4 mathematical coordination. 5 Manipulation would be talking about the 6 bot scores. But since I'm not going to be 7 testifying about that, I won't be speaking about 8 manipulation – testifying about manipulation at 9 trial at all. 10 Q Okay. And as to the coordinated effort, 11 you wouldn't form any opinion as to the underlying 12 impetus of that coordinated effort, correct? 13 A I couldn't talk about what's in people's 14 minds, no. 15 Q Okay. Well, let's take a look at -- let's 16 take a look at your data chart. 17 MR. CRAWFORD: Ms. Gonzalez, can we pull 18 up Exhibit 5, please. 19 (Schnell 5, Hashtag Comparison, was marked 20 for identification and is attached to the 21 transcript.) 22 AV TECHNICIAN: Exhibit 5.</p>	<p style="text-align: right;">92</p> <p>1 referring to communications with counsel. 2 BY MR. CRAWFORD: 3 Q So I don't want to know about your 4 communications with counsel, but I -- it is 5 important that I understand what you're going to 6 testify to. So to the extent that your 7 communications with counsel are somehow -- if 8 they're going to be reflected in your testimony, I 9 would say that that needs to be disclosed. So 10 what -- I'll try to ask it this way: What, if 11 anything, are you going to testify about with 12 respect to these callouts, or are they just there 13 and people are just going to look at them? 14 A It's possible that I'm not the only person 15 who uses this exhibit, so – I don't know if 16 people are just going to look at them. They may 17 be told something by someone else. I'm not going 18 to testify about what the meaning of the things in 19 the callouts are in any way. But if I'm asked if, 20 for example, there was a spike on a particular 21 date that's pointed to by an arrow here, I will 22 answer yes or no, depending on the day, things</p>

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1 going to be – I don't have an opinion I'm going
2 to be testifying about related to the bot
3 campaign.
4 Q Did you form any opinion that any of these
5 spikes were caused by the three Waldman statements
6 from the articles that we discussed earlier?
7 A Well, if we look at the section of the
8 disclosure that talks about – that is my rebuttal
9 to Mr. Bania's disclosure, I do show – I believe
10 I show spikes relating to certain words that
11 Mr. Bania said were Mr. Waldman's statements.
12 Q Can you explain what you mean by that,
13 there were spikes –
14 Were any of these spikes relating to
15 Mr. Waldman's statements?
16 A I can answer that if you look at the
17 additional charts I provided relating to my – to
18 the rebuttal of Mr. Bania's disclosure.
19 Q And which charts were those?
20 A Well, I don't have them in front of me,
21 but...
22 Q Are they included in this attachment?

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1 A I don't remember if – I don't remember.
2 I know I looked at the data. I don't know – I
3 don't remember if I made a chart or not to be
4 included in the disclosure, but – and when I say
5 "chart," I mean distinct from graphs. So I don't
6 know if there is an attachment that has a list of
7 the numbers or if it's just in the paragraph where
8 the rebuttal is.
9 Q Okay. I believe you testified earlier
10 that you – or you stated earlier that you would
11 be testifying to certain trends. Is that correct?
12 A That's correct.
13 Q Are any of those trends reflected in this
14 chart?
15 A Yes.
16 Q And what trends are those?
17 A Well, this chart shows trends. That's
18 what this graph shows.
19 Q And so what trends will you testify about?
20 A Well, the sort of spikes we just talked
21 about, for example, on this chart, and the one on
22 the – sorry, this graph, and the one on the

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1 following page is what I expect to testify about.
2 Q In looking at this chart and the data it's
3 representative of, what opinions did you form?
4 A That there were spikes on the dates or the
5 months that show spikes. That's the – those are
6 the opinions I formed based on these graphs.
7 Q Okay. But no opinion as to the underlying
8 cause of those spikes, just that they exist,
9 correct?
10 A Correct.
11 Q Okay.
12 MR. CRAWFORD: Ms. Gonzalez, can we go to
13 page 2 quickly.
14 Q And, Mr. Schnell, you – I mean, we looked
15 at this very briefly. This is the same chart as
16 page 1 with the hashtag "JusticeForJohnnyDepp"
17 removed, correct?
18 A That's correct.
19 Q So this is -- there's no additional
20 information here, it's just to give a better idea
21 of the scale of the other tweets -- of the other
22 hashtags that were used?

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1 A That's one way to put it. There is
2 certainly additional information for the eyes,
3 right, so you can see things you couldn't
4 otherwise see on page 1.
5 Q So "AmberHeardIsAnAbuser" appears to be
6 the next most notable hashtag; is that correct?
7 A It's the next most – I don't know if
8 "notable" is the right word, but certainly
9 viciously notable.
10 Q Yeah. Poorly phrased. Fair enough.
11 Do you have -- did you form any opinion as
12 to why the volume of tweets for the hashtag
13 "JusticeForJohnnyDepp" is so much higher than
14 these other ones?
15 A I did not.
16 MR. CRAWFORD: Okay. Ms. Gonzalez, can we
17 go to page 3, please.
18 Q And, Mr. Schnell, what are we looking at
19 here?
20 A So this is a consolidated report that
21 shows by month the use of the ten hashtags.
22 Q And what opinions did you form in looking