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Transcript of Stephen Deuters

Date: February 24, 2022

Case: Depp, II -v- Heard

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Transcript of Stephen Deuters
Conducted on February 24, 2022

<p>1 VIRGINIA: 2 IN THE CIRCUIT COURT FOR FAIRFAX COUNTY 3 4 ----- x 5 JOHN C. DEPP, II : 6 Plaintiff, : 7 v. : Civil Action No. 8 AMBER LAURA HEARD, : CL-2019-0002911 9 Defendant. : 10 ----- x 11 12 13 Videotaped Videoconference Deposition of 14 STEPHEN DEUTERS 15 Conducted Virtually 16 Thursday, February 24, 2022 17 12:30 p.m. 18 19 20 Job No.: 433440 21 Pages: 1 - 237 22 Reported By: Scott D. Gregg, RPR</p>	<p>3 1 APPEARANCES 2 ON BEHALF OF PLAINTIFF AND STEPHEN DEUTERS: 3 (Appearing via videoconference) 4 CAMILLE VASQUEZ, ESQUIRE 5 BENJAMIN G. CHEW, ESQUIRE 6 YARELYN MENA, ESQUIRE 7 BROWN RUDNICK LLP 8 2211 Michelson Drive, 7th Floor 9 Irvine, California 92612 10 (949) 440-0240 11 cvasquez@brownrudnick.com 12 bchew@brownrudnick.com 13 ymena@brownrudnick.com 14 //// 15 //// 16 //// 17 //// 18 //// 19 //// 20 //// 21 //// 22 ////</p>
<p>2 1 Deposition of STEPHEN DEUTERS, held at the 2 offices of: 3 4 5 All Parties Participated Via 6 Videoconference 7 8 9 10 11 Pursuant to notice, before Scott D. Gregg, RPR, 12 Notary Public in and for the City of Norfolk. 13 14 15 16 17 18 19 20 21 22</p>	<p>4 1 APPEARANCES CONTINUED 2 ON BEHALF OF DEFENDANT: 3 (Appearing via videoconference) 4 J. BENJAMIN ROTTENBORN, ESQUIRE 5 KAREN M. STEMLAND, ESQUIRE 6 WOODS ROGERS PLC 7 123 East Main Street, 5th Floor 8 Charlottesville, Virginia 22902 9 (434) 220-6826 10 brottenborn@woodsrogers.com 11 kstemland@woodsrogers.com 12 13 ALSO PRESENT: 14 Drew Halton, Videographer 15 Catherine Gonzalez, Technician Specialist 16 17 18 19 20 21 22</p>

<p style="text-align: right;">161</p> <p>1 the page, there's a representation of a couple -- 2 of part of the text exchange between you and Amber 3 that we looked at earlier, right? 4 MS. VASQUEZ: Objection; assumes -- 5 THE WITNESS: Yeah. 6 MS. VASQUEZ: -- facts, vague. 7 BY MR. ROTTENBORN: 8 Q And ET, you recognize that to be the logo 9 for Entertainment Tonight, correct? 10 MS. VASQUEZ: Calls for speculation. 11 THE WITNESS: I don't know what their logo 12 is, to be honest. 13 BY MR. ROTTENBORN: 14 Q Entertainment Tonight was the same outlet 15 that had a journalist contact you just the day 16 before that we just looked at, right? 17 A The one that said she had obtained my 18 texts? 19 Q Yes. 20 A Okay. 21 Q And at the top of this page it says, 22 Johnny Depp's assistant, Stephen Deuters, tells</p>	<p style="text-align: right;">163</p> <p>1 TMZ or Entertainment Tonight or any press outlet? 2 A I'm afraid I did not. 3 Q Did you make a statement that the text 4 themselves are suspicious because they don't even 5 show a date? 6 MS. VASQUEZ: Objection; asked and 7 answered for the sixth time, argumentative, 8 harassment. 9 THE WITNESS: No. 10 BY MR. ROTTENBORN: 11 Q Did you make a statement to Entertainment 12 Tonight, TMZ, or any other press outlet or 13 journalist that you will testify under oath you 14 never had a conversation about alleged violence 15 with Amber? 16 MS. VASQUEZ: Same objections, asked and 17 answered maybe the seventh time. I've lost count. 18 THE WITNESS: I never had any 19 conversations with TMZ or any other press outlet, 20 no. 21 BY MR. ROTTENBORN: 22 Q Did anyone on your behalf have any</p>
<p style="text-align: right;">162</p> <p>1 TMZ the texts that were posted in which he 2 allegedly apologized to Amber Heard for Johnny's 3 violent behavior are heavily doctored, and he 4 never said Johnny attacked her. 5 Is it your testimony that you never told 6 that to TMZ? 7 MS. VASQUEZ: Objection; asked and 8 answered for the third time. 9 THE WITNESS: Yeah, I never spoke to TMZ. 10 BY MR. ROTTENBORN: 11 Q Did you speak with any journalist or press 12 outlet and convey that message to them that TMZ is 13 reporting? 14 A No, I didn't speak with anyone. 15 Q Below it says, Deuters says he knows of no 16 acts of abuse toward Amber at the hands of Johnny 17 and has never made such a claim to anyone. He 18 adds, Johnny has never been violent toward anyone 19 he knows. 20 Do you see that? 21 A I see that, yes. 22 Q Did you make a statement to that effect to</p>	<p style="text-align: right;">164</p> <p>1 conversation with TMZ or any other press outlet 2 about any of the substance of this article? 3 MS. VASQUEZ: Objection; calls for gross 4 speculation. 5 THE WITNESS: Not to my knowledge, 6 certainly not. 7 BY MR. ROTTENBORN: 8 Q And as you sit here today, you're not 9 claiming in any way that the text messages between 10 you and Amber were doctored in any manner, 11 correct? 12 MS. VASQUEZ: Objection; calls for 13 speculation, calls for a legal conclusion. 14 THE WITNESS: I never found the text, so I 15 can't honestly say whether they were or whether 16 they weren't. 17 BY MR. ROTTENBORN: 18 Q You have no basis to believe that the text 19 messages were doctored in any way, correct? 20 MS. VASQUEZ: Objection; asked and 21 answered, argumentative. 22 And, Mr. Deuters, I'm going to caution</p>

165	1 you -- actually, I'm going to instruct you not to 2 answer on the basis of attorney-client privilege. 3 MR. ROTTENBORN: Scott, can you read back 4 the question, please. 5 (The reporter read back as requested.) 6 MS. VASQUEZ: Same instruction. 7 BY MR. ROTTENBORN: 8 Q Other than anything you have learned from 9 your attorneys or communications you've had with 10 your attorneys, you have no basis to believe that 11 these text messages were doctored in any way, 12 correct, Mr. Deuters? 13 MS. VASQUEZ: Same instruction, same 14 objection. 15 BY MR. ROTTENBORN: 16 Q Mr. Deuters, are you refusing to answer 17 the question on the basis of your attorney's 18 instruction? 19 MS. VASQUEZ: On the basis of 20 attorney-client privilege, yes, he is. 21 MR. ROTTENBORN: You're not the witness, 22 Camille. I asked him a question if he is refusing	167	1 which I am not asking about, do you have any basis 2 to believe that the texts that we looked at 3 between you and Amber Heard are doctored? 4 MS. VASQUEZ: Mr. Deuters, because you 5 can't answer that question without violating the 6 attorney-client privilege, I am going to, again, 7 instruct you not to answer. 8 BY MR. ROTTENBORN: 9 Q Are you following your attorney's 10 instruction, Mr. Deuters? 11 A Yes. 12 Q Did you ever ask TMZ to retract the 13 statements that they made in that article that 14 were attributed to you? 15 A No. I've never had any contact with them 16 whatsoever, so either way. 17 Q Were you comfortable with the fact that 18 apparently TMZ published an article that had all 19 sorts of alleged falsehoods about things that you 20 now claim you didn't say? Were you -- did that 21 make you uncomfortable? 22 MS. VASQUEZ: Objection; argumentative,
166	1 to answer. You're not testifying here. 2 BY MR. ROTTENBORN: 3 Q Mr. Deuters, are you re -- 4 MS. VASQUEZ: He is not answering your 5 question that invades the attorney-client 6 privilege, Mr. Rottenborn. 7 MR. ROTTENBORN: There's nothing that 8 invades the attorney-client privilege, but I'm 9 asking him if he is declining to answer. 10 BY MR. ROTTENBORN: 11 Q Mr. Deuters, are you taking your counsel's 12 advice and not answering my question? 13 A I am taking counsel advice. 14 Q Okay. I'll note -- we will very likely be 15 going to court on this and have you come back for 16 more time, Mr. Deuters, because that's a wildly 17 inappropriate instruction by your counsel. I made 18 clear I was not asking for attorney-client 19 communications. 20 So other than -- let me ask it again; I'll 21 give you another chance. 22 Other than attorney-client communications,	168	1 vague. 2 THE WITNESS: Yeah, I'm not sure what to 3 say. I wasn't paying much attention to that side 4 of things, to be quite honest. I don't recall my 5 feelings at the time. 6 BY MR. ROTTENBORN: 7 Q Did you -- did you have any conversations 8 with any of Johnny's representatives stating that 9 you were uncomfortable, that you had been 10 allegedly misquoted by TMZ? 11 MS. VASQUEZ: Objection; misstates prior 12 testimony. 13 THE WITNESS: Not to my knowledge. I 14 don't remember having conversations with his team, 15 with his lawyer team, no. 16 BY MR. ROTTENBORN: 17 Q Did you ever have any conversations with 18 Johnny's legal team at the time about these text 19 messages? 20 MS. VASQUEZ: Asked and answered. 21 THE WITNESS: I can't remember who the 22 legal team were. No, not to my knowledge. I

<p style="text-align: right;">169</p> <p>1 can't remember, sir. 2 MR. ROTTENBORN: Can we pull up Exhibit 1, 3 Catherine, please. 4 THE TECHNICIAN SPECIALIST: Standby. 5 MR. ROTTENBORN: Can you go to page 793 6 and 794. 7 BY MR. ROTTENBORN: 8 Q And in the UK trial, were you asked these 9 questions and did you give this answer, 10 Mr. Deuters? This is at line 22 of page 793: How 11 did they come to say that you said it is my fault. 12 I thought you had said somebody asked you about 13 the texts? 14 Answer: It was Johnny's counsel at the 15 time. 16 Question: A lawyer? 17 Answer: A lawyer or somebody who worked 18 with the lawyers. I guess his divorce lawyers or 19 his divorce team, and they asked me about the 20 texts because they had come out. And they said, 21 are these real, and I said yes. And they said, 22 can you say any more about them? And I said,</p>	<p style="text-align: right;">171</p> <p>1 put it that way -- in Australia in March of 2015 2 between Amber and Johnny? 3 MS. VASQUEZ: Objection; speculation, 4 vague, ambiguous. 5 THE WITNESS: Yes. Not sure quite what 6 you mean by "troublesome," Ben. I remember 7 working in Australia at that time, working on a 8 film. 9 BY MR. ROTTENBORN: 10 Q Sure. And did you -- did you -- the film 11 was Pirates 5, right? 12 A Yeah. 13 Q Did you travel to Australia in early March 14 of 2015? 15 A Yeah, I don't remember the exact date, but 16 if it was late February or early March, in that 17 bracket. 18 Q Leading up to that period, had you -- 19 well, strike that. 20 MR. ROTTENBORN: Can you pull up Deuters 21 2884, please, which we'll mark as the next 22 exhibit.</p>
<p style="text-align: right;">170</p> <p>1 well, they are taken out of context, you know. 2 What I meant by that is really just the bigger 3 picture. I never spoke to TMZ and I never said to 4 anyone, even to counsel, that they were doctored. 5 Did I read that right? 6 A Yes. 7 Q Did you tell Johnny's legal team that the 8 texts were real in June of 2016? 9 MS. VASQUEZ: Objection; asked and 10 answered. 11 THE WITNESS: I mean, yeah, I'm reading 12 that back, but I can't at this stage, at this 13 moment right here, right now, I don't recall that 14 conversation. I recall never having spoke to TMZ, 15 that is very clear; that's my abiding memory of 16 the situation. 17 BY MR. ROTTENBORN: 18 Q Do you recall a -- 19 MR. ROTTENBORN: You can take that exhibit 20 down, please. 21 BY MR. ROTTENBORN: 22 Q Do you recall a troublesome period -- I'll</p>	<p style="text-align: right;">172</p> <p>1 THE TECHNICIAN SPECIALIST: Please 2 standby. 3 Exhibit 16. 4 (Exhibit No. 16 was marked for 5 identification.) 6 MR. ROTTENBORN: Can you just blow up the 7 second text, please, just that row. 8 BY MR. ROTTENBORN: 9 Q (Mr. Deuters, do you recognize this as a 10 text sent from you on March 1st, 2015, to -- is CD 11 @ChristiDembrowski?) 12 A Sorry. I can't see it. It's a bit small. 13 MR. ROTTENBORN: We can blow it up all the 14 way in the left. 15 BY MR. ROTTENBORN: 16 Q (In the left-hand column, CD is -- that's 17 @ChristiDembrowski, right?) 18 A Yeah. 19 Q Okay. And this was a text that you sent 20 to her on March 1st, 2015; is that right? 21 A Yeah, it's entirely possible, yeah. I 22 recall -- I know what that means in the Geoffrey.</p>

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1 I actually remember that, yep.
2 Q Okay. You know, I was going to ask you
3 just a few questions about this. You said, such a
4 great afternoon with him today. SG might just
5 have got through.
6 Who is SG?
7 A I don't know who SG is. I don't know who
8 SG is.
9 Q Okay. And you say, we sat with Geoffrey
10 for over five hugely productive hours.
11 Who is Geoffrey?
12 A That's referring to Geoffrey Rush, the
13 actor.
14 Q Okay. Who played with him in Pirates 5?
15 A Correct.
16 Q Okay. And you said, he was certainly the
17 man I recognized.
18 When you say that, you were referring to
19 Johnny being the man you recognized, right?
20 A Or Geoffrey. I don't know.
21 Q Okay. And you said, I even got to cancel
22 Manson for coming back since he didn't want it to

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1 interfere with work of Amber
2 is that referring to canceling an event
3 where Depp would hang out with Marilyn Manson?
4 MS. VASQUEZ: Objection; calls for
5 speculation.
6 THE WITNESS: Yeah, without researching
7 further, I don't know. But, I mean, Manson, with
8 a capital M, must mean something. Maybe he was
9 touring at the time or something.
10 BY MR. ROTTENBORN:
11 Q Johnny often hung out with Marilyn Manson,
12 right?
13 MS. VASQUEZ: Objection; vague, calls for
14 speculation.
15 THE WITNESS: They did have the occasional
16 meet, yes, but not very often. He wasn't someone
17 that I saw much of.
18 BY MR. ROTTENBORN:
19 Q Okay. And it was -- you believed that
20 Marilyn Manson was, let's just say, not a good
21 influence on Johnny, right?
22 MS. VASQUEZ: Objection; vague, assumes

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1 facts.
2 THE WITNESS: I mean, not sure what I'd
3 say about that. I mean, it's not really for me to
4 say. I just preferred it when we were working as
5 opposed to not working. They weren't working
6 together, so it would have meant we wouldn't have
7 been working, so I think I'd probably lean towards
8 that.
9 BY MR. ROTTENBORN:
10 Q Marilyn Manson was someone that would --
11 when Marilyn and Johnny got together, your
12 understanding was that Johnny would use drugs with
13 Marilyn Manson, correct?
14 MS. VASQUEZ: Objection; vague, calls for
15 speculation.
16 THE WITNESS: Yeah, I couldn't say that
17 that was my inference.
18 BY MR. ROTTENBORN:
19 Q Do you have any personal knowledge of
20 Johnny doing drugs with Marilyn Manson?
21 A It's not something I witnessed, no.
22 Q Did you ever hear from Johnny that he did

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1 drugs with Marilyn Manson?
2 MS. VASQUEZ: Calls for hearsay.
3 THE WITNESS: He didn't really speak like
4 that. So even if it had occurred, it wouldn't be
5 relayed, so no, no. I don't recall it, no.
6 MR. ROTTENBORN: Can we go to -- we're
7 going to come back to this document, but can we
8 mark as the next exhibit Depp 11297.
9 THE TECHNICIAN SPECIALIST: Exhibit 17.
10 (Exhibit No. 17 was marked for
11 identification.)
12 MR. ROTTENBORN: Thank you.
13 BY MR. ROTTENBORN:
14 Q So the third text down, this is a text
15 from Johnny to you on March 6, 2015, right?
16 A Starting with "honestly"?
17 Q Yes.
18 A Yep, I see it. I'm just reading it.
19 Okay.
20 Q And Johnny was -- on March 6, 2015, Johnny
21 was in Australia to film Pirates 5, right?
22 A Without checking my calendar, I think so,

<p style="text-align: right;">177</p> <p>1 yeah. I think that's right.</p> <p>2 Q And is your recollection that you were in</p> <p>3 Australia at the time as well?</p> <p>4 A Yes, I would have been there at the same</p> <p>5 time.</p> <p>6 Q And is it fair to say that in a -- I guess</p> <p>7 some colorful language, Johnny is expressing</p> <p>8 discontent with Disney here, right?</p> <p>9 MS. VASQUEZ: Objection; misstates the</p> <p>10 document, calls for speculation, assumes facts,</p> <p>11 and lack of foundation.</p> <p>12 THE WITNESS: Excuse me. It doesn't say</p> <p>13 Disney in particular. It seems more sort of a</p> <p>14 general commentary, perhaps.</p> <p>15 BY MR. ROTTENBORN:</p> <p>16 Q General commentary on what, to your</p> <p>17 understanding?</p> <p>18 MS. VASQUEZ: Calls for speculation.</p> <p>19 THE WITNESS: Yeah, I can see by my reply</p> <p>20 below it, so clearly my presumption. Well, I</p> <p>21 mean, you know, his words they're characters.</p> <p>22 He's being -- assuming -- so, you know, being</p>	<p style="text-align: right;">179</p> <p>1 March 6, 2015, correct?</p> <p>2 A Yes.</p> <p>3 Q Do you still stand by those words today</p> <p>4 and have those same feelings toward him?</p> <p>5 MS. VASQUEZ: Objection; compound.</p> <p>6 THE WITNESS: Sorry, Ben. What was the</p> <p>7 question?</p> <p>8 BY MR. ROTTENBORN:</p> <p>9 Q Do you still have those same feelings and</p> <p>10 sentiments toward Mr. Depp today?</p> <p>11 A Certainly.</p> <p>12 MR. ROTTENBORN: Catherine, if you can,</p> <p>13 please, go back to Deuters 2884. Thank you.</p> <p>14 BY MR. ROTTENBORN:</p> <p>15 Q Now, at some point you became aware of an</p> <p>16 argument or an altercation that Mr. Depp had with</p> <p>17 Ms. Heard while in Australia, correct?</p> <p>18 MS. VASQUEZ: Objection; vague, assumes</p> <p>19 facts, and calls for speculation.</p> <p>20 THE WITNESS: Yeah, I'm not quite sure.</p> <p>21 At one point I became aware of something --</p> <p>22 BY MR. ROTTENBORN:</p>
<p style="text-align: right;">178</p> <p>1 somewhat down on his -- well, what he ignorantly</p> <p>2 started to think of as his legacy is --</p> <p>3 THE COURT REPORTER: I'm sorry. You have</p> <p>4 to keep your voice up.</p> <p>5 THE WITNESS: Sorry. I'm just re-reading</p> <p>6 the text back.</p> <p>7 BY MR. ROTTENBORN:</p> <p>8 Q He is expressing discontent that his</p> <p>9 Captain Jack Sparrow character and the work he's</p> <p>10 done in the Pirates franchise, right?</p> <p>11 MS. VASQUEZ: Objection; assumes facts,</p> <p>12 misstates the prior testimony, misstates the</p> <p>13 document, calls for speculation.</p> <p>14 THE WITNESS: I don't know if it's</p> <p>15 specific to Captain Jack or general. I don't</p> <p>16 know. But it is discontent, sure.</p> <p>17 BY MR. ROTTENBORN:</p> <p>18 Q Okay. And then you respond to him with</p> <p>19 the text below, right?</p> <p>20 A Yes.</p> <p>21 Q And those are all your words and your</p> <p>22 feelings that you expressed to Mr. Depp on</p>	<p style="text-align: right;">180</p> <p>1 Q I just want to know everything that you</p> <p>2 remember about that particular incident, if</p> <p>3 anything.</p> <p>4 MS. VASQUEZ: Objection; calls for a</p> <p>5 narrative, assumes facts, hearsay, and vague.</p> <p>6 THE WITNESS: Yeah, because I wasn't -- I</p> <p>7 didn't stay at the house. And, I mean, I have to</p> <p>8 go back to the memory banks.</p> <p>9 Johnny came to the hotel. He came to the</p> <p>10 hotel. He was brought by, I think, his security</p> <p>11 guys. Came to the room -- I mean, it was clear</p> <p>12 that he cut himself, but he didn't tell us. He</p> <p>13 was quite reticent to say much. I think we --</p> <p>14 then it was probably around then that we realized</p> <p>15 that a serious injury had occurred, but we didn't</p> <p>16 know how.</p> <p>17 BY MR. ROTTENBORN:</p> <p>18 Q You're referring to the tip of his finger</p> <p>19 being severed?</p> <p>20 A Correct, yeah.</p> <p>21 Q Okay. And you don't have any personal</p> <p>22 knowledge about how that happened, correct?</p>