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Transcript of Terence Dougherty

Date: December 2, 2021

Case: Depp, II -v- Heard

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IN THE CIRCUIT COURT FOR
FAIRFAX COUNTY, VIRGINIA

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JOHN C. DEPP, II, :
 Plaintiff and :
 Counter-Defendant, :
 v. :
AMBER LAURA HEARD, :
 Defendant and :
 Counter-Plaintiff. :

Civil Action No.
CL-2019-0002911

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VIDEOTAPED DEPOSITION OF TERENCE DOUGHERTY
HELD REMOTELY
Thursday, December 2, 2021
8:30 a.m.

Job No.: 412275
Pages: 1 - 439
Reported By: Debi Pearce

1 Videotaped deposition of TERENCE DOUGHERTY,
2 held remotely, pursuant to notice, before
3 Debi Pearce, Notary Public in and for the State of
4 Maryland and the Commonwealth of Virginia.
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A P P E A R A N C E S

APPEARING VIA VIDEOCONFERENCE ON BEHALF OF
PLAINTIFF JOHN C. DEPP, II:

BENJAMIN G. CHEW, ESQUIRE

JESSICA MEYERS, ESQUIRE

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APPEARING VIA VIDEOCONFERENCE ON BEHALF OF
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1 Q And that's because the Rolling Stone 14:44:04
2 relied on nothing other than the word of a 14:44:06
3 practiced liar, correct? 14:44:10
4 MS. BREDEHOFT: Same objections. 14:44:12
5 MR. SCHWARTZ: Same objections. 14:44:13
6 A I don't know what -- what was the 14:44:14
7 constellation of things that they relied on. 14:44:19
8 Q Had they done their due diligence, they 14:44:22
9 never would have run the false story, would they? 14:44:25
10 MS. BREDEHOFT: Same objections. 14:44:27
11 Go ahead. 14:44:29
12 MR. SCHWARTZ: Same objections. 14:44:29
13 A I don't know that it is the case that -- I 14:44:30
14 don't know. I don't know the answer to that. 14:44:34
15 MR. CHEW: All right. Let's look, please 14:44:38
16 -- let's turn to Exhibit 73. 14:44:43
17 THE TECHNICIAN: Yes, sir. Standby. 14:44:51
18 (Whereupon, the above-referenced document 14:44:51
19 was marked as Exhibit No. 73.) 14:44:51
20 (Document displayed.) 14:44:53
21 BY MR. CHEW: 14:44:53
22 Q **Mr. Dougherty, have you ever seen this** 14:45:09

1 **document before?** 14:45:26

2 A **Yes.** 14:45:29

3 Q **Is this the online copy of the op-ed that** 14:45:31

4 **the ACLU placed --** 14:45:34

5 MS. BREDEHOFT: Objection to the -- 14:45:38

6 BY MR. CHEW: 14:45:38

7 Q -- [indiscernible]. 14:45:38

8 MS. BREDEHOFT: -- form of the question. 14:45:39

9 I'm sorry. 14:45:40

10 Objection to the form of the question, and 14:45:41

11 calls for hearsay, foundation, and speculation. 14:45:42

12 Go ahead. 14:45:45

13 A **Yes.** 14:45:47

14 Q **Directing your attention to the title,** 14:45:47

15 **"Amber Heard: I spoke up against sexual violence -** 14:45:54

16 **and faced our culture's wrath. That has to** 14:45:58

17 **change."** 14:46:04

18 **Who came up with that title?** 14:46:04

19 MS. BREDEHOFT: Objection to the form of 14:46:06

20 the question, hearsay, foundation, and 14:46:08

21 speculation. 14:46:11

22 Go ahead. 14:46:11

1 **A Based on my investigation, I'm not aware** 14:46:12
2 **of any -- I'm not aware that the ACLU had any role** 14:46:16
3 **in writing the name of the op-ed piece, and my** 14:46:23
4 **understanding of how op-ed pieces work is, that** 14:46:26
5 **the media, in this case The Washington Post, would** 14:46:31
6 **have drafted the name of the -- the title of the** 14:46:36
7 **op-ed and not the person who wrote the op-ed.** 14:46:41
8 **Q Did The Washington Post seek the ACLU's or** 14:46:45
9 **Ms. Heard's approval of its title?** 14:46:51
10 **A I believe the answer to that is: No.** 14:46:54
11 **There's nothing in the evidence that shows that** 14:46:55
12 **they reached out to us to do that, and it is** 14:46:57
13 **inconsistent with my understanding that these news** 14:46:58
14 **outlets do not usually ask for the permission of** 14:47:01
15 **the author of the op-ed to -- you know, for when** 14:47:04
16 **they come up with the title.** 14:47:08
17 Q It says, "I spoke up against sexual 14:47:10
18 violence - and faced our culture's wrath." 14:47:14
19 What does that refer to? 14:47:18
20 MS. BREDEHOFT: Objection, leading, 14:47:19
21 hearsay, foundation, calls for speculation. 14:47:22
22 Go ahead. 14:47:25

1	A That, after Ms. Heard spoke up about	14:47:27
2	domestic violence, that she then had a lot of	14:47:34
3	significant adverse impact of this, such as, you	14:47:36
4	know, relating to her career and relating to how	14:47:45
5	the public, at large, approached her.	14:47:48
6	Q What "violence" did she speak up about?	14:47:50
7	MS. BREDEHOFT: Objection to the form of	14:47:54
8	the question, also hearsay, foundation, and	14:47:56
9	speculation.	14:47:58
10	Go ahead.	14:47:59
11	A I believe that Amber has spoken up about	14:48:00
12	several instances of violence throughout her life,	14:48:04
13	including during her marriage to Johnny Depp.	14:48:09
14	Q So you understood, as anybody would, that	14:48:12
15	this was a reference to her claims that her	14:48:16
16	then-husband, Johnny Depp, physically abused her,	14:48:21
17	correct?	14:48:25
18	MS. BREDEHOFT: Objection to the form of	14:48:25
19	the question, and also calls for hearsay,	14:48:30
20	foundation, and speculation, and I believe it's	14:48:31
21	also outside of the topic.	14:48:32
22	Go ahead.	14:48:32