

TRANSCRIPT OF THE POOL TV FEED FROM DEPP v HEARD

FAIRFAX COUNTY COURT Thursday 14 April 2022

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Man: ...in session. The Honorable Penney Azcarate presiding. [inaudible 00:00:03]

Judge: Good morning.

Together: Good morning, Your Honor.

Judge: All right. The first thing I wanna say is, I get a call from my mother last night and my mother-in-law saying, "Why did you have your phone on the bench?" So I wanna clear everything up. That was not my phone. That was a call for the computer system, because I guess we have an open line for remote witnesses so that it came through the computer system. Jamie says it's never happened before. It came through the computer system and she hung up on it. So just for the record, that was not my phone. So I don't need that kind of grief from my mother, all right? Come on. Okay. Thank you. All right, so I think before the jury comes out, we do have one issue with exhibit 548.

Woman 2: Plaintiff's exhibit.

Judge: Plaintiff's exhibit 548. Okay. So, you had offered it to come into evidence. And I know there was an objection. There's a lot of hearsay on it. And so, is there a redacted copy for me, or is that something you haven't worked through?

Mr. Chew: We haven't seen it.

Judge: Okay. Okay, that's fine, Mr. Chew. I think it was her witness, but that's fine. Well, I know it's their exhibit, but you're offering it. And so if you're offering it, you have to redact it to basically, I think it says two...

Woman 2: I wanted to make sure [inaudible 00:01:26] this morning. I wasn't sure the court's ruling so I didn't know what...

Judge: Well, I just wanted to make sure I know...

Woman 2: I think we need to work out the details tonight, your Honor.

Judge: Okay, if you could work out the details, so you owe me one exhibit. So we'll get that at some point today, right? Or even if I guess tomorrow when I see you guys, that's fine. Okay, perfect. All right. Anything else preliminary before the jury, Mr. Rottenborn?

Mr. Rottenborn: One brief matter, Your Honor. May we approach?

Judge: Yes, that's fine. Okay, are we ready for the jury?

Man: Yes.

Judge: Okay. All right. Good morning, ladies and gentlemen.

Together: Good morning.

Judge: All right. Your next witness.

Mr. Rottenborn: Good morning, Your Honor. Our first witness is Kate James by video.

Judge: Okay, by video. [inaudible 00:02:17] two seconds earlier. Can you get the screen up? I like to get the screen up before...Ladies and gentlemen, I usually try to get the screen up before you...because of that, the sound, but we'll get it up for you.

[00:02:27]

[silence]

[00:02:54]

Mr. Rottenborn: Good morning, Ms. James. Can you please state your full name?

Ms. James: My name is Katherine Olwin [SP] James.

Mr. Rottenborn: What's your current address? Have you ever spoken with Ms. Vasquez before today?

Ms. James: Yes.

Mr. Rottenborn: When?

Ms. James: I don't recall.

Mr. Rottenborn: What was the substance of that conversation?

Ms. James: I don't recall.

Mr. Rottenborn: Was it in the past month?

Ms. James: No.

Mr. Rottenborn: Is it in the past year?

Ms. James: Yes.

Mr. Rottenborn: Did you talk about this case?

Ms. James: No.

Mr. Rottenborn: What did you talk about?

Ms. James: I don't recall.

Mr. Rottenborn: If you don't recall, how can you recall that you didn't discuss this case? Have you discussed this case or the UK litigation with Mr. Waldman?

Ms. James: Yes, I discussed the UK case with Mr. Waldman.

Mr. Rottenborn: What did you discuss about the UK case with Mr. Waldman?

Man: Your Honor, can we stop this, please?

Judge: Okay.

Ms. James: I don't recall.

Judge: Could you pause, please?

Mr. Rottenborn: No details whatsoever that you recall?

Ms. James: No.

Mr. Rottenborn: Did Miss...?

Judge: You could...There you go. Sorry, you wanna approach?

Mr. Rottenborn: [inaudible 00:04:26]

Judge: I'm not sure. Ladies and gentlemen, in addition to the video deposition, there are some extra statements that this witness made that aren't part of the video, but it's part of her testimony. So Mr. Rottenborn is just gonna read those into the record and for you as well. Okay?

Mr. Rottenborn: Question, have you spoken with Adam Waldman before? Answer, yes. Question, when was the last time you spoke with them? Answer, I don't recall. Question, how many times have you spoken with him? Answer, I would say somewhere around 10 times,

total. Question, have you spoken with him in 2020? Answer, yes. Question, what was the substance of that conversation? Answer, friendly banter. Question, about what? Answer, nothing to do with the case at all. Question, what was it about? Answer, we have gotten to know each other. And, you know, I was on vacation, said Happy New Year. That's it. Question, did you call him or did he call you? Answer, I didn't call him. Question, did you text him? Answer, I sent a message saying Happy New Year to a lot of my friends. Question, over text? Answer, yes.

Judge: Thank you, sir. Fred, you can continue the video.

Mr. Rottenborn: ...Waldman assisted you in preparing your witness statements for the UK litigation?

Ms. James: No.

Mr. Rottenborn: Did you exchange drafts of those statements with Mr. Waldman?

Ms. James: No.

Mr. Rottenborn: Who did you send those drafts to?

Ms. James: Schillings.

Mr. Rottenborn: Is every word in those witness statements words that you drafted?

Ms. James: Yes.

Mr. Rottenborn: Did anyone provide edits to those witness statements for your consideration?

Ms. James: I'm very good at my own editing, I can assure you.

Mr. Rottenborn: That didn't answer my question. Did anyone else provide edits to those witness statements?

Ms. James: No.

Mr. Rottenborn: You've spoken with Mr. Depp since he and Amber got divorced, correct?

Ms. James: Correct.

Mr. Rottenborn: When was the last time you spoke with him? You can answer.

Ms. James: I don't recall.

Mr. Rottenborn: Was it within the past year?

Ms. James: No.

Mr. Rottenborn: In any day prior to today, if you would change text messages with Mr. Depp?

Ms. James: Yes.

Mr. Rottenborn: When was the last time approximately that you exchanged text messages with Mr. Depp?

Ms. James: I would say 2016. Oh yeah, I think 2016 but it's a long time ago.

Mr. Rottenborn: When was the last time you spoke with Amber Heard?

Ms. James: I don't recall.

Mr. Rottenborn: Was it shortly after your employment with her ended in 2015?

Ms. James: No.

Mr. Rottenborn: Was it after that?

Ms. James: No.

Mr. Rottenborn: Have you spoken with her to the best of your recollection or communicated with her in any way in the past, say, five years?

Ms. James: No.

Mr. Rottenborn: When were you hired by Ms. Heard?

Ms. James: In 2012.

Mr. Rottenborn: How did you meet her?

Ms. James: Her sister put an ad through, you know, a recruitment system I use in my field.

Mr. Rottenborn: Take me through the chronology of...Well, let me ask you this way. When did you...Would you describe your work for Ms. Heard as a personal assistant? Is that what you call your job title?

Ms. James: Yes.

Mr. Rottenborn: When did you first start working as a personal assistant?

Ms. James: In 1999.

Mr. Rottenborn: For how many people have you served as a personal assistant?

Ms. James: Maybe six.

Mr. Rottenborn: Since you left Ms. Heard's employment in 2015, for how many people have you served as a personal assistant?

Ms. James: One, it's the same person I work for to this day, and I've been with him for six-and-a-half years.

Mr. Rottenborn: Ms. James, have you had any other jobs other than this personal assistant job since you left Ms. Heard's employment?

Ms. James: No.

Mr. Rottenborn: Your work for Ms. Heard, was it part-time or full-time?

Ms. James: It started as part-time and became full-time.

Mr. Rottenborn: When did you change from part-time to full-time?

Ms. James: I don't recall.

Mr. Rottenborn: What were your job duties?

Ms. James: To manage the mansion.

Mr. Rottenborn: Give me your best summary of what your job duties were, please.

Ms. James: Is this relevant? Okay. So let's see. I mean if you are ready for a really, really long time of me explaining all of the details, that's fine. It's everything you could possibly do to run someone's life. Okay? So it is grocery shopping. It is taking care of admin. It is running errands. It is getting the car fixed. It is getting the dog's groomed. It is picking up flowers. It is dealing with the decorator. It is dealing with the housekeeper. It is going on and on and on and on, and it goes on every single day. Arranging travel, dealing with all of the surplus staff around the travel, booking all the greeters, dealing with the changing of travel. Okay? Liaising with people that she's working with on films, updating her calendar accordingly, liaising with the people on set every single day to update her calendar to ensure that she knows what scenes she's doing

each day, what her call time is. Every day, it's something different. It's a myriad of things that go across the board daily.

Mr. Rottenborn: You were paid for that work, correct?

Ms. James: Very poorly.

Mr. Rottenborn: What were you paid? Was it \$1,500 a week to start?

Ms. James: Are you kidding? I wish. My God. No, it was not. She paid me \$25 an hour to start off with. And she finally agreed after screaming abuse at me that she would pay me \$50,000 a year once I went to full-time. And this was after me working for well over 10 years as a personal assistant. So it was very insulting to me. But I did it anyway because I had grandfathered in the ability to pick up my son from school and bring him to work with me at 3.00.

Mr. Rottenborn: And you could have left Ms. Heard's employment at any time, correct?

Ms. James: Yes.

Mr. Rottenborn: You were based in Los Angeles when you were providing personal assistant services to Ms. Heard, right?

Ms. James: I have always lived in Los Angeles since 1999.

Mr. Rottenborn: So you didn't travel with Ms. Heard when she was out of town. correct?

Ms. James: That was another part of our agreement that I wouldn't travel with her because of my child.

Mr. Rottenborn: And she was out of town quite a bit, right?

Ms. James: Not really.

Mr. Rottenborn: Not really? How many weeks a year would you estimate Ms. Heard was out of town while you worked for her?

Ms. James: Well, you're talking almost 10 years ago, so I can't tell you quite honestly.

Mr. Rottenborn: But when she was out of town, you wouldn't see...you never traveled with her, right?

Ms. James: No.

Mr. Rottenborn: How much did you see Mr. Depp over the course of your employment with Ms. Heard?

Ms. James: Regularly.

Mr. Rottenborn: How many times? Well, obviously, you didn't see him when he was out of town, right?

Ms. James: No.

Mr. Rottenborn: When he was in town, was it would you see him daily, weekly, monthly, what would you estimate?

Ms. James: There is no rhyme or reason to answer that question.

Mr. Rottenborn: Now, you never witnessed any violence between Ms. Heard or Mr. Depp, right?

Ms. James: No.

Mr. Rottenborn: And Ms. Heard never told you that she had been violent to Mr. Depp, correct?

Ms. James: No.

Mr. Rottenborn: You had knowledge that Ms. Heard and Mr. Depp had arguments, correct?

Ms. James: No.

Mr. Rottenborn: Ms. Heard never told you that she and Mr. Depp had had arguments?

Ms. James: Occasionally she'd send a text message complaining about her mental state, but it was never clear exactly what was going on.

Mr. Rottenborn: So you never...

Ms. James: I remember, she would text me complaining about her mental state, and that was about it. I don't have any of the text messages, so it's hard to remember.

Mr. Rottenborn: Do you recall hearing anything about an alleged incident between Amber and Johnny on a flight from Boston to L.A. around this timeframe?

Ms. James: Like I said, I remember that day very well.

Mr. Rottenborn: And to follow up on that, I'm not asking just about what Amber may have told you. I'm just trying to drill down generally to what

you may have heard, whether from Amber or Johnny or anyone, about that flight. Does that make sense? So, can you tell us, what do you remember hearing about that flight or what happened or didn't happen on that flight from Boston to L.A.?

Ms. James: I don't know.

Mr. Rottenborn: Sitting here today you don't remember anything that you heard about that?

Ms. James: I don't know. I wasn't on the plane. I just know what happened afterwards. Okay? When she asked me to meet her at the shuttle.

Mr. Rottenborn: Did you think to ask her if she was okay?

Ms. James: You know, I probably did because that's my role to play a caregiver. That's all I can imagine.

Mr. Rottenborn: So, what do you remember about this day that you alluded to earlier?

Ms. James: Mostly my surprise that they went to the Chateau Marmont because Amber had an apartment of her own in West Hollywood that was, like, completely set up and available to her. So that was my biggest confusion. Like, why did she go to the Chateau? And then she asked me to get her bathing suit. I remember that. So I had to go to her apartment to get her bathing suit, which, again, seemed strange to me. And then what also seemed strange is when I got there, she had a bunch of friends with her. And originally, I thought she was alone.

Mr. Rottenborn: When you refer to Amber's apartment, are you referring to the apartment on Orange Avenue?

Ms. James: Yes.

Mr. Rottenborn: And isn't it true that Mr. Depp would spend time in that apartment with Amber from time to time, correct?

Ms. James: Well, I don't really know what the question is in relation to that. He wasn't there at that time, if that's what you were referring to.

Mr. Rottenborn: Yeah, no, that's not my question. My question was just over the course of your employment, do you have knowledge of Mr. Depp spending time at that Orange Avenue apartment?

Ms. James: They spent time there and at his residences. I would go around different residences, yeah.

Mr. Rottenborn: Were you concerned about Ms. Heard and her well-being on this day?

Ms. James: No, because it did become a pattern with her. And so, I was nearly placating her, I would say, and especially when I saw she was there with about four or five girlfriends and basically having fun, enjoying each other down by the pool. That's why she needed a swimsuit. And then they proceeded to hang out all day drinking while I sat around waiting with my son. Actually, I think it was a Sunday that day, I remember. We had to wait all day while they just hung around drinking by the pool. And then finally, I went home. And suddenly, she went back to her apartment. And then she wanted me to go back and pack her bags with her at about 10:00 at night on Sunday. And I said I couldn't go. By that point, I'd already spent the whole day sitting there. So I said I couldn't go and pack a bag because I've already put my son to bed, and she was very angry about that. I remember that.

Mr. Rottenborn: Okay, so let's...So when you asked her if she was okay, you didn't actually care if she was okay. You said you were just placating her? Right?

Ms. James: It was a standard procedure, at this point. She was a dramatic person.

Mr. Rottenborn: So you didn't actually think that there was anything...that Amber was actually upset, correct?

Ms. James: As I said, it just didn't make sense that she went to the Chateau instead of going home. That was the first red flag for me that day.

Mr. Rottenborn: So you came to the conclusion that day that she actually wasn't upset, is that what you're saying?

Ms. James: It's too much. I already answered once.

Mr. Rottenborn: What I'm asking is, did you come to the conclusion that there was nothing wrong with Ms. Heard that day and that she wasn't actually upset?

Ms. James: I don't know how to answer. You know, it's such a strange question. Like I said, you already asked me and I already answered.

Mr. Rottenborn: I'm asking you to answer it again. I don't think I asked the exact same question. But do your best, please.

Ms. James: Could you ask me the question in a different way or a clearer way that is not exactly the same as the last question you asked me?

Mr. Rottenborn: Did you reach the conclusion that day that Ms. Heard hadn't experienced anything traumatic?

Ms. James: Over the course of the day, I observed Ms. Heard enjoying the company of her friends for several hours. That's all I have to say on that matter.

Mr. Rottenborn: And would it be odd for someone who's experienced trauma to want to be around friends to you?

Ms. James: Yeah, I don't know.

Mr. Rottenborn: So in any event, you said you sat around at the Chateau Marmont, is that right?

Ms. James: Yes, while she was deciding what to do.

Mr. Rottenborn: Now, you were being paid for that time, correct?

Ms. James: Not overtime. It was a Sunday. I was not being paid. No.

Mr. Rottenborn: Did you avail yourself of anything at the hotel? Like, did you order any food?

Ms. James: No.

Mr. Rottenborn: Did you...?

Ms. James: I might have ordered some food for my son, actually, to be honest, now that I think about it because he was little at the time. I think he was, you know, 5 or something. So I might have ordered food for my son. I'm not a big eater. Food is not a priority for me.

Mr. Rottenborn: Would you have put that on Ms. Heard's tab that day?

Ms. James: Everything was on Depp's tab that day. So, no.

Mr. Rottenborn: On Johnny's tab?

Ms. James: Yes.

Mr. Rottenborn: Let's bring up the document entitled...or that ends in 6151, please.

Man: [inaudible 00:20:47]

Mr. Rottenborn: When she wrote, "I love you," and you wrote, "Love you too, hun. Won't be long. X," was that just placating Ms. Heard?

Ms. James: That is a friendly text exchange in my role of work.

Mr. Rottenborn: Were you trying to be supportive at all or are just placating her?

Ms. James: A little bit of both, I guess.

Mr. Rottenborn: Did you have any concern whatsoever about Ms. Heard's well-being that day?

Ms. James: No.

Mr. Rottenborn: When was the first time you remember Ms. Heard telling you that all wasn't right in the relationship between her and Mr. Depp?

Ms. James: I don't recall exactly when it started but it was usually her complaining and crying due to, I would say insecurities within the relationship more than anything else. She would be very, very insecure a lot of the time. And she would call me up crying. I remember one time she called me when she was alone in New York City, and she was crying, walking around the streets crying. And he wasn't there. She was alone. But I said she needed to go inside because I was worried that the paparazzi might take a photo of her, and she was in a very dysregulated state. And so just out of kindness, I said to her it was better if she went inside, rather than walking around crying in public. I remember that but I don't remember exactly when that was. It might have been 2012 or 2013. As the job went on, we called each other less and less, and did mostly text messaging. It was all text messaging we did.

Mr. Rottenborn: Did you ever believe that...mistreated her?

Ms. James: No.

Mr. Rottenborn: And why not?

Ms. James: Just never any evidence of that at all. I was there almost daily in both her place, and then eventually at his place in West Hollywood, and then ultimately at the lofts downtown. It was a daily basis experience morning, noon, night all days of the week. So, I never once saw any evidence of anything.

Mr. Rottenborn: Did Ms. Heard ever tell you that Johnny had hit her?

Ms. James: No.

Mr. Rottenborn: Did she ever tell you that Johnny had pulled her hair or pushed her?

Ms. James: No.

Mr. Rottenborn: Let me ask it a little bit differently. You never believed Ms. Heard that Mr. Depp had mistreated her? Is that correct?

Ms. James: At the time or after? I never believed...in what context are you talking about, during my employ or afterward?

Mr. Rottenborn: During your employment.

Ms. James: No, never. And there was never any damage to the apartment that I witnessed. There was never any aftermath of anything ever, that I ever saw.

Mr. Rottenborn: Now, you, of course, have no personal knowledge one way or the other whether Johnny was abusive to her, correct?

Ms. James: Well, I don't know if that's necessarily true because if it was true, I would have seen the damage, even if I wasn't physically present in the moment of these alleged arguments.

Mr. Rottenborn: And what's your basis for that statement?

Ms. James: Well, if someone's being beaten, there's generally physical evidence.

Mr. Rottenborn: So, your testimony is that if there was no physical evidence that you observed, then it couldn't have happened, the domestic violence by Johnny toward Amber. Is that your testimony?

Ms. James: No.

Mr. Rottenborn: Well, I'm trying to understand what your testimony is. Maybe you could clarify for me, Ms. James. Is your testimony that...you never saw firsthand evidence of Johnny being violent to Amber that it couldn't have happened?

Ms. James: That's not what I said. You're trying to put words into my mouth. I don't appreciate that.

Mr. Rottenborn: Can you pull up the document that is...? Well, let me see what it ends with here. It's the doc Depp 11432, please.

Man: Showing exhibit 4 on screen.

Judge: Could you pause for a moment, please?

Mr. Rottenborn: I'll direct your attention to the...This is the document to the corresponding filings. If you could just bear with us for one minute, and then we'd like to move over.

Judge: All right, what's the number on it?

Mr. Rottenborn: That's what we're trying to figure out. Sorry for the delay. Your Honor, it's trial exhibit 844.

Judge: All right. And that's defendant 844?

Mr. Rottenborn: Yes, ma'am.

Judge: Okay. 844, any objection to 844?

Woman: Yes, Your Honor. [inaudible 00:26:30]

Judge: All right, if you want to approach then. If somebody has a copy of 844 for me.

Man: [crosstalk 00:26:39.525] electronically.

Judge: We'll get it. We'll get it. Okay. That's right. We'll get it.

Man: Can you just wait one minute before you start [inaudible 00:26:58]?

[00:26:58]

[silence]

[00:27:20]

Woman: [00:27:20]

Mr. Rottenborn: Yes, thanks. Box at the bottom, do you see your name, Kate, in the column labeled as defense?

Ms. James: Yeah.

Mr. Rottenborn: Is this a text message that you received from Mr. Depp on around August 13th, 2016?

Ms. James: Yes.

Mr. Rottenborn: And it appears that he's responding to something that you had sent

him, correct?

Ms. James: I don't know.

Mr. Rottenborn: You see where he says, "Thank you, sweetheart?"

Ms. James: Yes.

Mr. Rottenborn: He is directing that to you, right?

Ms. James: But it looks like there's someone else CC'ed on his text. So, it could be to that person. I honestly don't know. I can't answer your question.

Mr. Rottenborn: Could we please pause the video?

Judge: All right. Can we pause for a second?

Woman: Thank you.

Judge: He already did. That was good. Thank you.

Mr. Rottenborn: Nice work.

Judge: Can you switch to...?

Mr. Rottenborn: Your Honor, I'd like to...

Judge: We'll switch to...

Mr. Rottenborn: ...switch to [inaudible 00:28:24]. Thank you.

Woman: [inaudible 00:28:26]

Judge: Yeah, but not yet. Make sure it's set right for you, publish it. All right.

Mr. Rottenborn: And Your Honor, with a stipulation that we'll prepare redacted versions to be entered into evidence that has other personal identifiers redacted, we'd ask for permission to publish...to admit this into evidence and publish to the jury.

Judge: All right, and the objections are noted, and we'll get the redacted copy. All right?

Mr. Rottenborn: Thank you, Your Honor. Can you just blow it up, Heather?

[00:29:04]

[silence]

[00:29:32]

Judge: All right, are we ready to continue?

Mr. Rottenborn: Ready to resume with the video. Thank you, Your Honor. Do you see where he says, "Will hit you when I get back, I'll come over for a spot of purple and we'll fix her flabby ass nice and good?"

Ms. James: Yeah.

Mr. Rottenborn: Come over for a spot of purple means come over for a drink of wine, right?

Ms. James: I don't know.

Mr. Rottenborn: That's what you understood it to mean, correct?

Ms. James: I don't know.

Mr. Rottenborn: Lucien [SP], can you pull up the documents labeled "UK Trial Day 7 James Testimony," please? And Ms. James, you remember giving testimony at the trial in the UK, right?

Ms. James: Would there be something wrong with me if I didn't?

Mr. Rottenborn: And...

Judge: I need order in the court.

Mr. Rottenborn: ...when you gave that testimony...

Judge: Thank you.

Mr. Rottenborn: ...you gave it under oath, correct?

Ms. James: Yes.

Mr. Rottenborn: Lucien, can you please go to page 39 of the PDF? And can you please blow up the page that is labeled 1221? And on line seven, Ms. James, am I reading this right that you were asked a question, "And he is inviting you over for a spot a purple, what is that?" "Yes," your answer. Question, "What did you understand?" You answered, "Red wine, I imagine." Do you see that?

Ms. James: Yeah, I do remember that.

Mr. Rottenborn: Do you remember giving that testimony?

Ms. James: Mm-hmm. Yeah.

Mr. Rottenborn: So is it your understanding that Mr. Depp was inviting you over for wine at some point after he split up from Ms. Heard?

Mr. Rottenborn: And just speculation.

Mr. Rottenborn: Did you meet up with Mr. Depp for red wine around the time period of this text on August 13th, 2016?

Ms. James: I did meet up with him but we did not drink red wine. No.

Mr. Rottenborn: Was anyone else present for that meeting?

Ms. James: No.

Mr. Rottenborn: When he said, "Come over for a spot of purple and we'll fix her flabby ass," you understood him to be referring to Ms. Heard when he said, "We'll fix her flabby ass," correct?

Ms. James: It wasn't for me to speculate what he was referring to.

Mr. Rottenborn: And I'm not asking for you to speculate what he was referring to. I'm asking for your understanding was that he was talking about Ms. Heard, correct? You can answer.

Ms. James: There isn't an answer. I mean, this is the way he writes. It's very random and you don't, sort of, question it. It's just the way he writes. He writes in a very abstract way.

Mr. Rottenborn: Okay. Lucien, if you can just pull up the prior testimony that we just looked at. Ms. James, isn't it true that on line 12 of page 1221, you were asked the question, "Red wine, and not only to come over for a spot of purple, but to fix her flabby ass, that was about Ms. Heard, was it not?" And on line 14, you answered, "Yes. Yes." Do you see that?

Ms. James: Yes. Mm-hmm.

Mr. Rottenborn: So you did understand this to be referring to Ms. Heard? Correct? I'm sorry, you said no?

Ms. James: Just trying to be agreeable in the court, having no clue what on earth is going on. So, there you go. I have no clue.

Mr. Rottenborn: Was that answer in the court truthful or just agreeable?

Ms. James: Just being agreeable.

Mr. Rottenborn: So it wasn't truthful? You can answer.

Ms. James: I don't have an answer for you, Mr. Rottenborn.

Mr. Rottenborn: What did you and Mr. Depp talk about at that meeting that you recall?

Ms. James: I don't recall details.

Mr. Rottenborn: Just tell me generally everything you recall.

Ms. James: It's too long ago, Mr. Rottenborn. I don't recall.

Mr. Rottenborn: Do you recall anything?

Ms. James: No.

Mr. Rottenborn: Where was the meeting?

Ms. James: At his residence in West Hollywood.

Man: Is that his residence? Sorry.

Ms. James: In West Hollywood.

Mr. Rottenborn: What time of day?

Ms. James: About 3:00 p.m.

Mr. Rottenborn: So you recall the time but you don't recall anything you discussed?

Ms. James: Well, I'm just saying, I know it was in the afternoon because it was after I picked my son up from school because my son went to swim in the pool with the security guards watching him while I went and had a brief conversation with Mr. Depp. That's the only reason I remember the time.

Mr. Rottenborn: Did you talk about Ms. Heard?

Ms. James: Yes.

Mr. Rottenborn: What did you discuss about Ms. Heard?

Ms. James: Like I said, I don't recall the details.

Mr. Rottenborn: Well, I'm just a little confused because you just testified you didn't remember anything but now you remember that you did talk about Ms. Heard. What I'm trying to get is everything you remember about the conversation.

Ms. James: You've got to understand, Mr. Rottenborn, the mutual connection between Mr. Depp and myself is, in fact, Ms. Heard, so

inevitably that is going to be part of the conversation. That's all I remember. Okay?

Mr. Rottenborn: Do you remember anything else about that conversation with Mr. Depp?

Ms. James: No.

Mr. Rottenborn: Have you seen Mr. Depp since that conversation?

Ms. James: No.

Mr. Rottenborn: Now, what's your...? Just describe generally your educational background, please.

Ms. James: I completed high school, and then I went straight into becoming a veterinary nurse when I left school, which I did for approximately three to four years before I left Australia.

Mr. Rottenborn: Do you have any sort of specialized training in veterinary medicine or nursing?

Ms. James: Only on-the-ground experience four years in a clinic.

Mr. Rottenborn: So, you don't have any experience with medical training for humans, right?

Ms. James: No.

Mr. Rottenborn: And you don't have any training in healthcare, correct?

Ms. James: Could you be more specific?

Mr. Rottenborn: You don't have any training in healthcare for people, correct?

Ms. James: I'm not a human nurse if that's your question. I don't really understand your question.

Mr. Rottenborn: Sorry. You don't have any training related to prescription drugs, do you?

Ms. James: No.

Mr. Rottenborn: And you have no basis...

Ms. James: Excuse me, only pertaining to animals. Yeah, I would like to add that.

Mr. Rottenborn: Okay, and that was the training that you received on the job in Australia before you came to the U.S.?

Ms. James: Amongst other things, yeah.

Mr. Rottenborn: You're familiar with Ms. Heard taking prescriptions for Accutane and Provigil, among other things, correct?

Ms. James: Yeah.

Woman: Objection.

Mr. Rottenborn: You never served as a nurse or a doctor to Ms. Heard, right?

Ms. James: No.

Mr. Rottenborn: And you have no medical knowledge to testify whether Ms. Heard used Provigil or Accutane in the way her doctors instructed, correct?

Ms. James: No.

Mr. Rottenborn: And you're not an expert on the interaction of prescription drugs and alcohol or other drugs, correct?

Ms. James: No.

[00:37:27]

[silence]

[00:37:47]

Mr. Rottenborn: Did you, during the course of your employment, develop any personal knowledge of Mr. Depp's use of alcohol or drugs?

Ms. James: Not firsthand.

Mr. Rottenborn: And what do you mean by not firsthand?

Ms. James: Well, I worked with Amber. I didn't work with him.

Mr. Rottenborn: Did you ever see Mr. Depp using illegal drugs?

Ms. James: No.

Mr. Rottenborn: Did you ever see Mr. Depp abuse alcohol?

Ms. James: No.

Mr. Rottenborn: Did you ever speak with Dr. Kipper?

Ms. James: No.

Mr. Rottenborn: Did you ever speak with Aaron Gorham?

Ms. James: Yes.

Mr. Rottenborn: And Aaron Gorham was a nurse who worked for Dr. Kipper, right?

Ms. James: He was assigned to Amber.

Man: I'm sorry? All right.

Ms. James: She was assigned to Amber, that's how I came to be speaking to her.

Mr. Rottenborn: And she also provided medical services to Johnny, right?

Ms. James: I don't know.

Mr. Rottenborn: What do you recall speaking to Aaron Gorham about?

Ms. James: Just random chitchat in the course of the day. Nothing specific.

Mr. Rottenborn: Do you recall ever forming any concern in your own mind about any of Mr. Depp's behavior in his relationship with Amber?

Ms. James: Never.

Mr. Rottenborn: Nothing you heard? Nothing you witnessed? Nothing you saw during your time with Ms. Heard ever gave you an inkling of concern about Mr. Depp's behavior toward Amber?

Ms. James: Never.

Mr. Rottenborn: Now, you left your employment...your employment with Amber ended in early 2015, correct?

Ms. James: Yeah, just after they came back from the wedding on the island.

Mr. Rottenborn: Did Ms. Heard terminate your employment?

Ms. James: When Ms. Heard came back from the island, she informed me that she now needed to support her mother because her mother could no longer work after a diagnosis, a medical diagnosis. And she

told me she could no longer afford to pay me said she had to support her mother, and therefore, she would have to terminate my employment to support her family.

Mr. Rottenborn: And did you resent misheard for that, for terminating your employment?

Ms. James: It would have been nice to be given some notice so I had some time to look around. So I was a little upset for the lack of notice. But apart from that, no, I was not upset.

Mr. Rottenborn: Ms. Heard gave you six weeks of severance pay, correct?

Ms. James: I don't recall.

Mr. Rottenborn: Did you want to stay in the job for Ms. Heard?

Ms. James: Well, I did ask if I could have a few months' heads up so I could seek another job that would suit the terms of my employment, but she did not allow that.

Mr. Rottenborn: And that made you angry, correct?

Ms. James: No.

Mr. Rottenborn: Did you ask to be put on Mr. Depp's payroll so that you could remain being paid by Ms. Heard or Mr. Depp?

Ms. James: Well, when she said she couldn't afford it, I said, "Now you're married, couldn't I go onto Depp's payroll?" And she said no, it was part of a legal agreement they had that she was not allowed to do that. I don't know whether that was true or not.

Mr. Rottenborn: Did you ever ask Mr. Depp whether you could go on his payroll?

Ms. James: No.

Mr. Rottenborn: Isn't it true that you asked to live in one of Mr. Depp's houses rent-free for a period of time after your employment?

Ms. James: Well, you see, I'm a homeowner, and I wanna be clear, I didn't wanna miss a mortgage payment due to unemployment. So my idea was, is perhaps I could find an alternate accommodation in order to rent out my house so I don't lose my entire property. I'm a homeowner, keeping my home and my payments up to date is paramount importance to me.

Mr. Rottenborn: Isn't it true that you had already skipped about a year-and-a-half of mortgage payments on your home during the time you were employed by Ms. Heard?

Ms. James: No.

Mr. Rottenborn: Let's pull up the document ending in ALH 5858, please.

Man: Is that exhibit 11 on the screen?

Mr. Rottenborn: Yeah, I think I can...I think you've read everything. So if you're ready to re-ask question, my first question is just, is this an email exchange between you and Amber relating to the termination of your employment?

Ms. James: Yeah, this is the email I received when she terminated me.

Mr. Rottenborn: And then the emails in this document, some of which are duplicated, are an email exchange that you had with Amber after you received the termination email?

Ms. James: Yeah, when I woke up that morning. Yeah.

Mr. Rottenborn: Can you go to the first page, please, of the document? Isn't it true that Ms. Heard did pay you six extra weeks of pay after your termination?

Ms. James: She's stating that but I don't recall if it actually happened or not.

Mr. Rottenborn: You don't have personal knowledge one way or the other or recollection of whether she did?

Ms. James: No.

Mr. Rottenborn: And isn't it true that you do tell her in this email that you didn't pay your mortgage for the first year-and-a-half that you were working for her?

Ms. James: Yeah. I had one of those balloon mortgages, so I had to go through a loan modification. And I recall now that that's why I was able to agree to work for her for such a small amount of money than what I normally made. It was sort of as a favor almost.

Mr. Rottenborn: What was a favor?

Ms. James: To work for her for like half my usual paycheck basically.

Mr. Rottenborn: So you were doing Amber a favor?

Ms. James: Yes. Because initially it was described as a part-time 20-hour-a-week thing, more flexibility, and blah, blah, blah. So, you know, I thought it's not really in my caliber, but my son was only 4 at the time, so it seemed like a good idea, especially because I wasn't paying my mortgage so I could take the hit by getting less pay than I would normally make. And that way I could also have the time with my son that I wanted.

Mr. Rottenborn: And I think the answer to this is no, but I just wanna be clear. You're not blaming Amber for you're not paying your mortgage, right?

Ms. James: No, that was my choice. That was the only way I could get a loan modification. It's the way [inaudible 00:44:45]. You know the 2008 crash, that's how it worked back then if you wanted to save property.

Mr. Rottenborn: And you started working for Amber in 2012, right?

Ms. James: Yes, it took a long time with our modification process.

Mr. Rottenborn: And you're not blaming Amber for getting a credit card with 29% interest, are you?

Ms. James: What?

Mr. Rottenborn: You see in your email on that first page, about two-thirds of the way down, you say, "I have borrowed from my mom my tenant security deposit, and now I have used up a credit card I shouldn't use as it has 29% interest."

Ms. James: No, that's my choice.

Mr. Rottenborn: Did you have tenants in your property at that time?

Ms. James: I have a duplex. I'm just trying...In that time, yes, I had tenants in one house and I was living in the other.

Mr. Rottenborn: Did you use those tenants' security deposit for personal expenses?

Ms. James: I don't remember.

Mr. Rottenborn: Do you see where you say, "I have borrowed from my mom my tenant security deposit?"

Ms. James: Mm-hmm.

Mr. Rottenborn: Do you recall using your tenant security deposit or borrowing from that?

Ms. James: It's too long ago for me to recall if it actually happened.

Mr. Rottenborn: Would there be a reason that you would have said that if it wasn't true?

Ms. James: No.

Mr. Rottenborn: And isn't it true that you did ask to live rent-free in one of Johnny's houses after you were terminated, right?

Ms. James: Lots of people did.

Mr. Rottenborn: And isn't it true that you did?

Ms. James: Yes.

Mr. Rottenborn: And did that ever come to pass?

Ms. James: No. Did it make you angry that that didn't happen?

Ms. James: No.

Mr. Rottenborn: It's fair to say at the time that your employment was terminated you were in fairly significant financial trouble, correct?

Ms. James: Yes.

Mr. Rottenborn: And you were angry with Amber for terminating you at this time when you were in financial trouble, correct?

Ms. James: No.

Mr. Rottenborn: You see at the bottom of your email on page two, you say, "Max and I love you very much" as a sign off to your email?

Ms. James: Yes.

Mr. Rottenborn: Max is your son, right?

Ms. James: Yes.

Mr. Rottenborn: That wasn't true, correct? In fact, you didn't love Amber. You didn't like her, did you?

Ms. James: Any close relationship has ebbs and flows, and the energy that you feel towards one another, it's pretty standard.

Mr. Rottenborn: And at that point in time, you...well, since your termination, you've had nothing but animosity toward Ms. Heard, correct?

Ms. James: No, I actually bumped into it her at the P.O. box about three months after and she was in her Range Rover. And I saw her sister and she said, "Come say hi to Amber." And I went back there and I was gonna say how but she was on the phone, and she was saying, "Wait, wait," but then I had to go. That's the only time I've ever seen her. But I wanted to go and say hi. I wasn't feeling like I wanted to avoid her or anything. You know, things happen and life goes on, you know.

Interviewer: I understand you're a personal assistant. Ms. James, what type of people do you work for?

Ms. James: High-profile celebrities.

Interviewer: Are they celebrities in the entertainment industry?

Ms. James: Yes.

Interviewer: You previously testified that in March 2012 you worked as a personal assistant for Ms. Heard, yes?

Ms. James: Yes.

Interviewer: In total, how long did you work for Ms. Heard as her personal assistant?

Ms. James: Almost three years.

Interviewer: And at the time you were hired in March of 2012, had you ever heard of Ms. Heard?

Ms. James: No.

Interviewer: You previously testified today that at some point while working for Ms. Heard, you transitioned from working part-time to full-time. Is that right?

Ms. James: Mm-hmm.

Interviewer: When did that transition happen?

Ms. James: I don't recall specifically.

Interviewer: Do you think it happened within the first year of your employment?

Ms. James: I believe it happened within around six months into the employment.

Interviewer: So most definitely, it happened in the first year of your employment. Is that correct?

Ms. James: Yes.

Interviewer: You previously testified that you stopped working for Ms. Heard as her personal assistant in February of 2015. Is that right?

Ms. James: Yes.

Interviewer: And you also testified that Ms. Heard let you go upon her return from the Bahamas in February of 2015, yes?

Ms. James: Yes.

Interviewer: Did Ms. Heard give you any indication or warning that your employment might end upon her marriage to Mr. Depp?

Ms. James: No.

Interviewer: So how did it make you feel when Ms. Heard terminated your employment without warning?

Ms. James: A bit of a shock, a bit of a feeling of being blindsided.

Interviewer: When you first began working for Ms. Heard, and when Ms. Heard was in town, in other words not traveling, how many times per week would you see her?

Ms. James: Almost daily.

Interviewer: And did that change when you became a full-time personal assistant for Ms. Heard?

Ms. James: No.

Interviewer: Would you see Ms. Heard on the weekends as well?

Ms. James: Yes.

Interviewer: When you would see Ms. Heard in person, did you coordinate with her when you would be seeing her?

Ms. James: No, I would arrive whenever it was necessary to bring stuff that I'd picked up on errands or whatnot. There was no given schedule.

Interviewer: And when you say you would arrive, where would you arrive to?

Ms. James: It depended where she was at the time. Sometimes she was at Orange. Sometimes she was at one of Johnny's houses on Sweetzer, and then eventually they all moved down to the lofts downtown.

Interviewer: You previously testified that your work as being Ms. Heard's private assistant was extensive. Would you please tell us everything that you were responsible for?

Ms. James: Everything from handling all of her dry cleaning, packages, mail, liaising with agents, other people in the industry, coordinating travel, making restaurant reservations, you know, dealing with the staff, the vendors on the property, that sort of thing.

Interviewer: Did Ms. Heard ever asked you to monitor press for her?

Ms. James: Yes.

Interviewer: What specifically did she ask you to do?

Ms. James: I had a newsstand guy that was instructed to hold two copies of every magazine she appeared in. It was a newsstand on Sherbourne Avenue just off La Cienega. And he would hold them for me and I would go there once a week to pick up a pile of magazines.

Mr. Rottenborn: I'm sorry, you got muffled out. You said that he would hold those for me and...

Ms. James: He would hold them for me and I would go approximately once a week to pick up whatever magazines Amber was featured in, two copies of each, which I would then store in her garage.

Interviewer: Why would you store them in Ms. Heard's garage?

Ms. James: Because she didn't want Mr. Depp to see them.

Interviewer: Did she tell you why she didn't want Mr. Depp to see them?

Ms. James: No, she just got very angry with me one day because I hadn't quite made it downstairs to put them in the garage when she came home and she went absolutely ballistic over that.

Interviewer: When you say she went absolutely ballistic over that, can you please describe what you mean?

Ms. James: Screaming, yelling, abuse.

Interviewer: Do you remember what she said to you?

Ms. James: No.

Interviewer: But it was abusive in your opinion?

Ms. James: Blind rage.

Interviewer: Over the three-year period in which you worked for Ms. Heard, were you ever with Ms. Heard when she was getting dressed or undressing?

Ms. James: All the time.

Interviewer: How often were you present when Ms. Heard was getting dressed?

Ms. James: Every time she was getting dressed for a fitting, I would say 90% of the time I was there.

Interviewer: And just to clarify, was it just when Ms. Heard was in fittings that you would see her in states of undress?

Ms. James: No, it was also in her apartment. She had no issue with walking around naked quite often.

Interviewer: Did you ever observe Ms. Heard putting on makeup?

Ms. James: Yes.

Interviewer: How often did you see Ms. Heard doing her makeup?

Ms. James: Just when she was getting ready to go out somewhere for a party.

Interviewer: And when you interacted with Ms. Heard, and I understand it was quite frequent and regular, did it appear to you that she was wearing makeup?

Ms. James: She usually never wore makeup unless she was going to a special event.

Interviewer: And when she did go to special events, how would you describe her makeup as heavy?

Ms. James: It would depend if makeup artists would do it or if she would do it herself. If she did it herself, it would be light and usually adding lashes, and that's about it.

Interviewer: And I believe you previously testified to this so sorry for asking you again but while you worked for Ms. Heard, did you ever see any types of injuries on her?

Ms. James: No.

Interviewer: Did you ever see any cuts?

Ms. James: No.

Interviewer: Did you see bruises?

Ms. James: No.

Interviewer: Did you see swelling?

Ms. James: No.

Interviewer: Redness in her face?

Ms. James: No.

Interviewer: How about Ms. Heard having black eyes?

Ms. James: Never.

Interviewer: A broken nose?

Ms. James: Never.

Interviewer: Missing hair clumps? Sorry, I didn't catch that.

Ms. James: Never.

Interviewer: Did you ever see Ms. Heard cry?

Ms. James: Yes.

Interviewer: How often did you see her cry?

Ms. James: It's hard to put a number on it. Sometimes she would cry on the phone. I think at least once or twice she might have cried on the phone. You know? And then as far as seeing her personally crying, you know, she was a pretty dramatic person. It's hard to really put a number on it.

Interviewer: I'm focusing on when you saw her in-person crying. How many times do you believe that you saw her in-person crying?

Ms. James: I would say twice, maybe. Twice.

Interviewer: Let's take that in bite sizes. The first time you saw Ms. Heard crying in-person, do you recall what she was crying about? Go ahead, Ms, James.

Ms. James: Insecure emotions.

Interviewer: So the two times that you recall Ms. Heard crying in front of you, you remember her crying about being insecure? Is that correct?

Ms. James: Yes.

Interviewer: You testified that she felt insecure about her relationship. Is that correct?

Ms. James: Yes.

Interviewer: Can you expand on that? What do you mean by that?

Ms. James: She didn't like being away from his physical presence.

Interviewer: Did Ms. Heard tell you that she felt insecure when Mr. Depp wouldn't be present with her?

Ms. James: Yes.

Interviewer: Other than telling you she felt insecure about her relationship with Mr. Depp, what else did Ms. Heard say about feeling insecure?

Ms. James: She told me she didn't like hanging out in his house with his friends because it was boring and they're all old men playing guitars and it wasn't interesting to her.

Interviewer: Was Ms. Heard dating Mr. Depp when you first started working for her?

Ms. James: Yes.

Interviewer: When did you first learn that Ms. Heard was dating Mr. Depp?

Ms. James: After about a month, I think.

Interviewer: How did you learn that she was dating Mr. Depp?

Ms. James: She told me.

Interviewer: What did she tell you?

Ms. James: She told me she was dating Johnny Depp.

Interviewer: Do you recall the first time you met Mr. Depp?

Ms. James: Yes.

Interviewer: When was that?

Ms. James: It was in her apartment on Orange, probably shortly after she told me she was dating him, and he was standing in the dining room.

Interviewer: And Approximately when was that?

Ms. James: I don't remember. I would say April or May of 2012.

Interviewer: What was your impression of Mr. Depp?

Ms. James: That he was very peaceful, very calm, almost shy, and very quiet. And I remember he was wearing red suede shoes because I didn't know where else to look. I looked at his shoes. It's a weird recollection, I know. I'm just being honest.

Interviewer: Did you ever witness Mr. Depp be rude to anyone?

Ms. James: He's such a gentleman. He's like a total Southern gentleman. Yeah.

Interviewer: Did you ever see Mr. Depp lose his cool?

Ms. James: No.

Interviewer: Did you ever see him scream at anyone?

Ms. James: No.

Interviewer: Did you ever see him break something?

Ms. James: Only in a video.

Interviewer: In your presence, did you ever see Mr. Depp break something intentionally?

Ms. James: Never broke anything. Never throw anything. Always completely passive.

Interviewer: I believe you've testified previously, but you have a son, correct?

Ms. James: Yes.

Interviewer: How old was your son when you first started working for Ms. Heard?

Ms. James: Four years old.

Interviewer: And did you ever bring your son to work with you?

Ms. James: Yes.

Interviewer: How often?

Ms. James: Quite often. If I had to keep working, I would bring him back there after school. And if I had to work on the weekends, he would come with me then.

Interviewer: Did Mr. Depp ever interact with your son?

Ms. James: Yes, he was very kind.

Interviewer: How often did Mr. Depp interact with your son?

Ms. James: Whenever they were in each other's presence.

Interviewer: Can you give me an estimate of how often that happened?

Ms. James: Oh, countless times and he would even teach him how to play guitar. He brought him back [inaudible 01:00:45] from vacations. He showed him his amazing makeover when he was doing "Black Mass." He tricked him, he leant over him saying, "Do you know who I am?" with the full makeup. My son's jaw almost hit the ground. It was really cute, actually. He gave my son a little pick as well, a guitar pick, which he cherishes to this day as well.

Interviewer: Fair to say you were around Mr. Depp and Ms. Heard together quite a lot?

Ms. James: Yeah, it became increasingly more as the time went on. Yeah.

Interviewer: What was your impression of Ms. Heard and Mr. Depp's relationship?

Ms. James: You know, it did not seem like a perfect relationship to me based on a lot of insecurity on her behalf, which seemed to cause confusion in the relationship. Maybe the age gap was an issue because of their interests. I know that much. Apart from that, who am I to know a relationship, you know?

Interviewer: Do you think that Mr. Depp's was smothering of Ms. Heard?

Ms. James: Oh, no.

Interviewer: Did it appear to you that Mr. Depp was jealous of Ms. Heard?

Ms. James: No.

Interviewer: Did you ever have interactions with Mr. Depp by yourself?

Ms. James: Sometimes. Yeah.

Interviewer: And what were those interactions like?

Ms. James: Just friendly chitchat which would stop immediately when Amber saw me speaking to him, she'd give me the evil eye, and I'd know to just quickly walk away.

Interviewer: Did Amber ever talk to you about your interactions with Mr. Depp?

Ms. James: No.

Interviewer: In the three years that you worked for Ms. Heard, did you ever see Ms. Heard and Mr. Depp argue?

Ms. James: No.

Interviewer: In the three years you worked for Ms. Heard, did you ever see any physical violence between Ms. Heard and Mr. Depp?

Ms. James: Never.

Interviewer: Did you ever see either of them being physically aggressive with one another?

Ms. James: No.

Interviewer: Did you ever see any property damage at Ms. Heard's home?

Ms. James: Never.

Interviewer: Did you ever see any property damage at Mr. Depp's primary residence on Sweetzer?

Ms. James: Never.

Interviewer: Did you ever see any property damage at the lofts or the penthouses at the Eastern Columbia Building?

Ms. James: No, never.

Interviewer: Over the three-year period in which you worked for Ms. Heard, did you ever hear from anyone that Mr. Depp or Ms. Heard had been in a physical altercation?

Ms. James: No.

Interviewer: Over the three-year period in which you work for Ms. Heard, did you ever see Ms. Heard be physically aggressive with anyone?

Ms. James: No.

Interviewer: Let's break that down a bit. When you say she was verbally abusive to you regularly, can you explain to me how she was verbally abusive to you?

Ms. James: Screaming over the phone. She screamed at me once in-person, multiple times screaming at me over the phone. Barrages of abusive text messages day and night, a lot of them in the middle of the night, I think you're aware. I think between 2 and 4 a.m. the barrage would start. That's what I'd wake up to, all incoherent, not really making sense, just basically someone to lash out at, you know, no apparent reason to it.

Interviewer: You testified previously that you observed Ms. Heard be verbally abusive to her sister.

Ms. James: Yes.

Interviewer: What do you recall about that?

Ms. James: It was an ongoing kick the dog kind of relationship with her sister. So it's really hard to pinpoint any specifics, but yeah, her poor sister was treated like the dog that you kick, basically.

Interviewer: You've previously testified that you observed Ms. Heard being verbally abusive to her mother.

Ms. James: Mm-hmm.

Interviewer: What specifically did you observe?

Ms. James: Well, there is a video online where you can see her being abusive, first and foremost. So it's not even based on what I'm telling you. It's what I've seen the interactions between the two of them when her mother was still alive and the fact that her mother was terrified of her.

Interviewer: Did her mother tell you she was terrified of her?

Ms. James: She personally told me she was terrified of her.

Interviewer: Did you ever witness Ms. Heard tongue-lash her mother?

Ms. James: Here and there, yes. Especially when it was a build-up to a stressful event or something like that. Yeah.

Interviewer: You said you felt that Ms. Heard was verbally abusive to you. Can you provide me with any specific examples of this behavior?

Ms. James: I thought I did earlier. But yeah, it was so random and ongoing. You would never know when it was gonna come left of center. I do remember on one occasion when we were moving from part-time to full-time, and then the salary negotiations became a real bone of contention. And I specifically remember standing in her office where she leapt up out of her chair, put her face approximately 4 inches from my face, and she was spitting in my face, and telling me how dare I ask for the salary I was asking for, which was in fact approximately half of my regular annual salary. I was offering her that as a favor. And she felt that gave her the right to spit in my face. And there was a witness in the apartment at that time, by the way.

Interviewer: Who was at the apartment at the time?

Ms. James: The handyman, Hector Galindo.

Lucien: I'm sorry?

Ms. James: The handyman, Hector Galindo. He was so mortified. He was so embarrassed to hear her speaking to me like that.

Interviewer: Ms. James, while you worked for Ms. Heard, did you ever observe her drinking alcohol?

Ms. James: Yes, I did.

Interviewer: How often did you observe Ms. Heard drink alcohol?

Ms. James: I don't recall.

Interviewer: What alcohol did you observe Ms. Heard drink in your presence?

Ms. James: Red wine.

Interviewer: Did Ms. Heard ever appear intoxicated to you?

Ms. James: Yes, she often did.

Interviewer: While you worked for Ms. Heard, were you aware of what, if any, prescription drugs she was taking?

Ms. James: Yes, because I had to pick it up and I often had to deliver it to the her to set.

Interviewer: I'm sorry, Ms. James. I interrupted your question, or your answer, excuse me. The last part of your answer was to...

Ms. James: It was my job to pick it up and deliver it to her, also bring it to her if she was doing a photo shoot or, you know, on set or something if she'd forgotten it.

Interviewer: What prescription drugs do you remember picking up for Ms. Heard?

Ms. James: Provigil.

Interviewer: Any other prescription drugs that you remember picking up for Ms. Heard?

Ms. James: Accutane.

Interviewer: Any others?

Ms. James: Not specifically.

Interviewer: To your knowledge, did Ms. Heard ever stop taking Provigil or Accutane while you were working for her?

Ms. James: No.

Interviewer: Did Ms. Heard ever tell you that she was experiencing any side effects from Provigil?

Ms. James: She didn't say it but I observed it.

Interviewer: We'll go back to that in a minute, but did Ms. Heard ever tell you that she was experiencing any side effects from Accutane?

Ms. James: No.

Interviewer: You previously testified that you observed Ms. Heard having certain side effects from Provigil. Yes?

Ms. James: Yes.

Interviewer: What side effects did you observe Ms. Heard exhibiting?

Ms. James: Manic episodes.

Interviewer: Can you tell me what you mean by manic episodes?

Ms. James: Similar to if someone was on some sort of amphetamine drug, moving very fast, not making a lot of sense, hyper-organizing, hyper-tasking, just very, very hyper, yeah.

Interviewer: Besides prescribed medication, did you ever observe Ms. Heard ingest any illicit drugs while you worked for her?

Ms. James: No.

Interviewer: Did Ms. Heard ever tell you that she had ingested illegal drugs?

Ms. James: Yes.

Interviewer: When did Ms. Heard tell you that she had ingested illegal drugs?

Ms. James: Sporadically here and there.

Interviewer: What drugs did Ms. Heard tell you she had ingested?

Ms. James: Mushrooms, ecstasy, and cocaine.

Interviewer: If you remember, how many times did Ms. Heard tell you that she had ingested illegal drugs?

Ms. James: I can't remember.

Interviewer: Based on your personal observations, did it ever appear to you that Ms. Heard was under the influence of illegal drugs?

Ms. James: Yes.

Interviewer: How many times?

Ms. James: I don't know.

Interviewer: Less than five?

Ms. James: It's so long ago, it's hard for me to remember.

Interviewer: Why did it appear to you that Ms. Heard was under the influence of illegal drugs?

Ms. James: Disoriented, partying with friends, lots of heavy drinking, laughing, dancing, playing, all the sorts of things that go hand in hand with imbibing in drugs.

Interviewer: Would Ms. Heard's treatment of you change when she was intoxicated?

Ms. James: Yes.

Interviewer: How so?

Ms. James: She became more and more belligerent and abusive.

Interviewer: Ms. James, you previously testified that you provided testimony in the matter involving Mr. Depp in the United Kingdom. Do you remember that testimony?

Ms. James: Mm-hmm. Yep.

Interviewer: And how did you provide testimony in the United Kingdom?

Ms. James: Well, I wrote a statement, and then I had to do a live video feed.

Interviewer: And did you understand that your witness statement was made under oath?

Ms. James: Yes.

Interviewer: And did you understand that your testimony during the trial live was also under oath?

Ms. James: Yes.

Interviewer: Did anyone help you write your witness statement?

Ms. James: Schillings over in the UK helped me with the first draft, and then I took over and completely edited it to be my own words. That was afterwards a phone conversation we had. They jotted down notes, sent me some basic notes to work with, and then I worked on it from there.

Interviewer: How long did it take you to write your witness statement?

Ms. James: About three or four days.

Interviewer: Did you feel you had an adequate amount of time to prepare and write your witness statement?

Ms. James: Yes, I was very proud with the outcome of how I wrote it because it was all my words and it was the absolute truth.

Interviewer: And did you have enough time to review your witness statement for accuracy before you signed it?

Ms. James: Yes.

Interviewer: Was everything that was in your witness statement true and accurate to the best of your knowledge?

Ms. James: Yes.

Interviewer: And is that still true today?

Ms. James: Yes.

Interviewer: Lucien, may I please have you pull up Depp exhibit number 4, please?

Lucien: Depp exhibit number 4 on screen.

Interviewer: Thank you. Ms. James, do you remember receiving an email from Ms. Heard on or about February 12th, 2015?

Ms. James: I don't even believe I was still working at the date.

Interviewer: Do you remember receiving this email, in particular, from February 12th, 2015?

Ms. James: Again, as far as I know, I wasn't even working for her at that time so I wouldn't even know why she wrote this letter to me and what it was saying.

Interviewer: Do you remember receiving this email then?

Ms. James: No.

Interviewer: Okay. Can you please pull up exhibit number 5?

Lucien: [inaudible 01:16:47] on screen.

Interviewer: Lucien, may I ask you to...? There you go. You read my mind. Lucien, may I either take control or have you scroll down to the bottom? Thank you. Ms. James, the way these emails tend to work is they start at the bottom and then go up, and this one is no exception. For your ease, I'm gonna have you read the bottom email first since it's the first one in the chain, dated February 3rd, 2015.

Ms. James: Looks like he was traveling straight to London after the wedding. That's what I'm reading.

Interviewer: Do you remember...? Actually, you know what, why don't you read this entire email chain, and then I'm gonna ask you some questions about it.

[01:18:21]

[silence]

[01:19:02]

Ms. James: Can you help me? Oh, I don't know, it's being finicky.

Lucien: Do you have control over this slide?

Interviewer: I do have control. Sorry, Ms. James.

Ms. James: You can go up a bit more now.

Interviewer: Do you remember receiving these emails from Ms. Heard?

Ms. James: Not really. No. No.

Interviewer: Did you see where Ms. Heard, on February 4th, 2015 writes, "ARE THERE NO DIRECT FLIGHTS??!" I'm just pointing her to the top email, Mr. Rottenborn. Do you see where Ms. Heard writes to you, "ARE THERE NO DIRECT FLIGHTS?"

Ms. James: Yep.

Interviewer: You would agree with me that nowhere else in this email chain Ms. Heard uses all caps just to write to you, correct?

Ms. James: No, there is not. She seems very confused. That's all I can [inaudible 01:20:30] when I'm reading through this. She just seems to be very confused. And the thing is, like, if that question were to be directed to anyone, it should have been to the travel agent, not me. I mean, I'm not the travel agent. The travel agent was down there in the beginning, Trudy Sullivan.

Interviewer: Directing your attention, Ms. James, to May of 2014 when you met Ms. Heard at the Chateau Marmont in Los Angeles, California. Do you remember your testimony about that incident? You testified previously that Ms. Heard asked you to bring a bathing suit to the hotel. Is that correct?

Ms. James: Yes.

Interviewer: Did you see Ms. Heard wearing a bathing suit in May of 2014 at the Chateau Marmont?

Ms. James: Yes.

Interviewer: Based on your recollection, did you see any bruises on Ms. Heard's body?

Ms. James: No.

Interviewer: Did you see any red marks on Ms. Heard's body?

Ms. James: No.

Interviewer: How would you describe the general atmosphere or mood of Ms. Heard and her friends at the Chateau Marmont?

Ms. James: Well, to be honest, it seems a little conspiratorial to me.

Interviewer: How so?

Ms. James: Like a strategy meeting or something combined with a pool party, hard to describe. It was very confusing. Originally, I thought I was going over for some major emergency but then something else completely different was going on that day.

Interviewer: What made you think something completely different was going on that day?

Ms. James: Well, because, originally, it made it seem like she was having this major emergency, and she was completely alone, and she needed me very badly to come as quickly as possible but when I got there, she was surrounded by people, Savannah, IO Tillet Wright, and Rocky, specifically, Raquel Pennington.

Lucien: What was the second name you said? I got Rocky and who?

Ms. James: IO Tillet Wright. It's the letter I, the letter O, Tillett Wright.

Interviewer: Did you observe Ms. Heard showing what appeared to be injuries to any of her friends at the Chateau that day?

Ms. James: No.

Interviewer: Did it appear to you that Ms. Heard's friends were comforting her? How would you describe Ms. Heard's friends' behavior?

Ms. James: Friends hanging out together by the pool having cocktails and spending the entire afternoon hanging around together.

Mr. Rottenborn: Did you ever learn information that made you believe that one of the reasons that the relationship between Johnny and Amber wasn't, as you described, "perfect," was because of Johnny's substance abuse?

Ms. James: I couldn't speculate on the details of their personal relationship.

Mr. Rottenborn: You did testify earlier that one of the reasons you thought their relationship wasn't perfect was insecurity on Amber's part though, right?

Ms. James: Yes.

Mr. Rottenborn: So you developed an opinion that insecurity on Amber's part affected their relationship but you did not develop an opinion that substance abuse or any actions by Johnny affected their relationship. Is that right?

Ms. James: That statement was based on communications directly to me from Amber, basically.

Mr. Rottenborn: What communications specifically?

Ms. James: Expressing, you know, exactly what I just stated that she was sad. She didn't wanna be away from him, blah, blah. That's the thing. That would happen all the time.

Mr. Rottenborn: And you believe that those statements were the reason that their relationship wasn't perfect?

Ms. James: It's not for me to speculate.

Mr. Rottenborn: You would agree that just because someone is insecure in a relationship does not mean that she deserves to be abused, correct?

Ms. James: I have no answer for you for that.

Mr. Rottenborn: You would agree that even if someone acts "smothering" in a relationship doesn't mean she deserves to be abused, correct?

Ms. James: I don't have an answer for you for that.

Mr. Rottenborn: I don't have any further questions. Thank you for your time today.

Judge: All right. Thank you. All right, ladies and gents, let's go ahead and take our morning recess for 15 minutes. No outside research. Do not talk about the case. Okay. Thank you.

[01:25:45]

[silence]

[01:26:06]

All right, let's go ahead and take a break until noon. Is your next witness...? Right. We're gonna set it up, so it's all ready to go in the next...okay. I really appreciate that. Okay. Thank you. We'll be in recess until noon.

[01:26:21]

[silence]

[01:26:42]

Dr. Anderson: Laurel Avis Anderson.

Mr. Rottenborn: And what is your business address?

Dr. Anderson: It's been a while. 10921 Wilshire Boulevard, Westwood Medical Plaza, Suite 1101, Los Angeles, 90024

Mr. Rottenborn: And you're a clinical psychologist, is that correct?

Dr. Anderson: Correct.

Mr. Rottenborn: And you practice in Los Angeles?

Dr. Anderson: Yes.

Mr. Rottenborn: For how long have you been practicing?

Dr. Anderson: For almost 40 years.

Mr. Rottenborn: Have you been practicing in Los Angeles for that entire time?

Dr. Anderson: Yes.

Mr. Rottenborn: And you provide counseling for couples?

Dr. Anderson: Psychotherapy for individuals and couples.

Mr. Rottenborn: And what is psychotherapy? Just a brief layman's description.

Dr. Anderson: It's an evaluation of an individual or a couples' problems. And then it's a conceptualization of what's actually going on and an effort to make intervention that leads to change.

Mr. Rottenborn: Do you recognize what this document is?

Dr. Anderson: Yes.

Mr. Rottenborn: What is it?

Dr. Anderson: This is my ledger for tracking sessions that I use for billing.

Mr. Rottenborn: And sis this ledger comes out of your files?

Dr. Anderson: Yes.

Mr. Rottenborn: And you keep this document in the ordinary course of business?

Dr. Anderson: Absolutely.

Mr. Rottenborn: Okay. And I just want to...In this particular ledger, who is it for?

Dr. Anderson: Well, despite the names that are camouflaged, it's for Ms. Heard and Mr. Depp.

Mr. Rottenborn: At the top, what are the two names that it says there?

Dr. Anderson: Ann Henry and Joey Davis.

Mr. Rottenborn: And Ann Henry is Amber?

Dr. Anderson: Yes.

Mr. Rottenborn: And Joey Davis is Johnny Depp?

Dr. Anderson: Yes.

Mr. Rottenborn: And then it says age 29 and 52. Is that right?

Dr. Anderson: Yes.

Mr. Rottenborn: And 29 was the age of Amber Heard at the time?

Dr. Anderson: Yes.

Mr. Rottenborn: And 52 was the age of Johnny Depp?

Dr. Anderson: Yes.

Mr. Rottenborn: So as I understand it, on October 1st, 2015, Mr. Depp and Amber came in for couples counseling for three-and-a-half hours?

Dr. Anderson: Yes. Whether they were in for the full three-and-a-half or not, I don't know. But that was the amount...that was when the session started and they came in when they came in, and not together, and it took three-and-a-half hours to actually do that first session.

Mr. Rottenborn: So as I understand it, for that first session, Mr. Depp and Amber Heard did not come in together?

Dr. Anderson: I don't believe that they did. The next session with Ms. Heard alone for background intake, and that was a 2-and-one-third-hour session.

Mr. Rottenborn: And that session was on October 6th, 2015?

Dr. Anderson: Yes.

Mr. Rottenborn: And what's the next row?

Dr. Anderson: The next day.

Mr. Rottenborn: You saw Amber on October 6th, 2015 for two-and-a-third hours, correct?

Dr. Anderson: Yes.

Mr. Rottenborn: And what is the next row indicating?

Dr. Anderson: The next day, October 7th, Mr. Depp for three-and-a-half. Again, it may not have been face-to-face for the full three-and-a-half but it was being at the beginning of the session waiting for him, his coming in with the entourage and our getting to work.

Mr. Rottenborn: And for the three sessions we just discussed, the October 1st session, the October 6th session, and the October 7th session, those were all in person with you, correct?

Dr. Anderson: So, yes, the first three sessions were all in-person.

Mr. Rottenborn: And then what does it say for the next row, for the 10/14 row?

Dr. Anderson: Couple. Three hours.

Mr. Rottenborn: So on October 14th, 2015, Amber Heard and Mr. Depp saw you for a couple's session?

Dr. Anderson: Yes.

Mr. Rottenborn: There was a couple's session on October 14th for three hours. Is that right?

Dr. Anderson: 10/14, there's a couple's session. On 10/21, there's a couple's session where someone walked out for 2 hours. On 10/24, Ms. Heard did a phone session for one-and-a-half.

Mr. Rottenborn: And how did...? And on the 10/24 row next to the 2 hours, it says, "W out," correct?

Dr. Anderson: It's 10/21.

Mr. Rottenborn: In the 10/21 row, what does it say in the fourth column?

Dr. Anderson: For me, that's a walkout.

Mr. Rottenborn: And do you recall who walked out of that meeting?

Dr. Anderson: I have tried to and I don't because each threatened and stood up. And I'm not positive who finally did the walkout.

Mr. Rottenborn: And then what is it indicating on the row for 11/12, 2015?

Laurel: Coules session showed one-and-a-half hours.

Mr. Rottenborn: And then on 12/17, what does that show?

Laurel: Amber alone showed two-and-a-quarter hours.

Mr. Rottenborn: Based on this ledger, you saw Amber and Mr. Depp for four couples sessions?

Dr. Anderson: That's right.

Mr. Rottenborn: Dr. Anderson, I'm showing what's been marked as Anderson 3.

Lucien: And Your Honor, this time, we're looking to move to exhibit 397. There's no objections.

Judge: All right, 397, no objection. Is that correct?

Man: You're saying relevance objections?

Mr. Rottenborn: They didn't list objections in there. Didn't list and then we actually communicated this morning and they said they weren't affected.

Judge: All right. Do you know who on the team you talked with? I'm sorry.

Man: You want me to...?

Judge: No, that's just who...

Man: I believe it was Jessica Myers.

Judge: Okay. All right. So no objection. All right. Then that's okay. 397 in evidence then, defense 397.

Mr. Rottenborn: And I will let you...which is CC000172, I'll let you take a look at it. So it's a one-page email. So let me know when you're finished. Do you recognize this email chain?

Dr. Anderson: Yes.

Mr. Rottenborn: Do you know who Christian Carino is?

Dr. Anderson: Yes.

Mr. Rottenborn: On the page where it says laurel.anderson28@gmail.com, that's your email address?

Dr. Anderson: Yes.

Mr. Rottenborn: The email of March 28th, 2015 from Mr. Carino, he wrote, "Laurel, my closest friend, Amber, on copy, wants to come see you alone first and then with her husband, Johnny. We'll leave it to you two to arrange the time. Love you both." Do you see that email? Did you receive that email from March 28th, 2015?

Dr. Anderson: I did.

Mr. Rottenborn: And you responded to Mr. Carino's email, correct?

Dr. Anderson: As you can see, yes.

Mr. Rottenborn: Yeah. What was your understanding as to why Amber Heard wanted to meet with you?

Dr. Anderson: I took it at face value that Ms. Heard wanted to have a consultation. And if this is not infrequent that I might get an email like this. And when I hear that someone may then later want to come in with their husband or spouse, yes, I think it has to do with relationship issue.

Mr. Rottenborn: On September 9th, 2015, you received an email from Mr. Carino, is that right?

Dr. Anderson: Yes, apparently, he was trying to set it up.

Mr. Rottenborn: And Mr. Carino was trying to set up a meeting with you and Amber and Mr. Depp? Is that right?

Dr. Anderson: Yes, that's what I assumed.

Mr. Rottenborn: And you responded to Mr. Carino's email. Correct?

Dr. Anderson: I did.

Mr. Rottenborn: And then at the top, you received an email from Amber Heard?

Dr. Anderson: Yes.

Mr. Rottenborn: And she wrote, "Hi, Laurel, thank you so much for responding. I really appreciate it. I have to speak to my husband when he's done working today, and make sure he's good with that time. I think it sounds perfect. Thank you so much again. I'm really looking forward to meeting you." Did I read that correctly?

Dr. Anderson: Yes.

Mr. Rottenborn: And you received that email from Amber Heard?

Dr. Anderson: I did.

Mr. Rottenborn: On September 27th, 2015, you received an email from Amber Heard, correct?

Dr. Anderson: Yes.

Mr. Rottenborn: And Amber wrote, "Hi, Laurel, Johnny and I are back in town and would love to know if you have any availability to see us this week. Please let me know. Thanks." Did you receive that email from Amber Heard?

Dr. Anderson: Yes.

Mr. Rottenborn: And you responded that you were available on Thursday at 5:30 p.m., correct?

Dr. Anderson: Yes.

Mr. Rottenborn: And looking at the top of the email where it says Wednesday, September 30th, would you agree that the next day is Thursday, October 1st, 2015?

Dr. Anderson: Yes.

Mr. Rottenborn: And if we need to we can go back to your billing ledger. But the first time you saw Amber Heard and Mr. Depp was on October 1st, 2015. Is that right?

Dr. Anderson: Yes.

Mr. Rottenborn: Did you see Amber Heard on December 17th, 2015?

Dr. Anderson: Yes, we had established that, yes.

Lucien: [inaudible 01:37.00.012] on screen.

Mr. Rottenborn: Dr. Anderson, I'm showing you what's been marked as Anderson exhibit 7, which is Depp 3202. Take a chance to read it. And let me know when you're finished.

Dr. Anderson: Yes.

Mr. Rottenborn: Attachment 7 at the bottom is you see a March 8th, 2016 email from Christian Carino to you, correct?

Dr. Anderson: Yes.

Mr. Rottenborn: And Christian Carino was asking if you'd be willing to make a house call to Johnny Depp's apartment downtown. Is that right?

Dr. Anderson: I did not know where he lived.

Mr. Rottenborn: But this email says, "Would you be willing to make a house call to Johnny's apartment downtown?" Correct?

Dr. Anderson: Did it say downtown? Yes, it did. Okay.

Mr. Rottenborn: And then you responded on March 8th, 2016. Correct?

Dr. Anderson: Yes.

Mr. Rottenborn: And you wrote, "Hey, Christian, have, of course, avoided this my whole career unless someone was in rehab, would be willing to try it once. And if there's something I'd like Johnny to understand, and I don't think he does." Where you wrote, "I'd like Johnny to understand that..." Where you wrote, "I would be willing to try it once in that there's something I'd like Johnny to understand that I don't think he does," what did you mean by that?

Dr. Anderson: I can't say exactly what it was I wanted to impart, but I know that I thought that he was having difficulty in the sessions. And I think it was something about the process between the two of them that I was trying to clue him into.

Mr. Rottenborn: What difficulty was Mr. Depp having in the sessions?

Dr. Anderson: Having a voice.

Mr. Rottenborn: What do you mean by that?

Dr. Anderson: Ms. Heard had a jackhammer style of talking. She was very amped up. He had trouble talking at a similar pace. Their dialogue, he was cut off a lot. So, I'm guessing this is what I was...I'm not sure what it is. But there was something...Anyhow, this is how he didn't have a voice. He couldn't keep up with her rapid-fire way of conversation. And so he was really overwhelmed.

Mr. Rottenborn: In working with Amber and Mr. Depp, did Amber ever report to you any physical violence on behalf of Mr. Depp toward Amber?

Dr. Anderson: Yes.

Mr. Rottenborn: What type of physical violence that you report to you? Do you recall seeing photos from Amber Heard?

Dr. Anderson: I have, but I don't remember when I saw them.

Mr. Rottenborn: What do you recall about the photos?

Dr. Anderson: Her face was bruised.

Mr. Rottenborn: Do you recall where on Amber's face you saw bruises?

Dr. Anderson: I think they were around her eyes but I couldn't be positive.

Mr. Rottenborn: Did you witness abuse by either?

Dr. Anderson: I didn't witness. I didn't witness.

Mr. Rottenborn: Had you worked with Mr. Depp before working with Amber and Mr. Depp?

Dr. Anderson: No.

Mr. Rottenborn: Is it your testimony that while Mr. Depp may have said he wasn't violent with any of his other partners, there was violence from Mr. Depp toward Amber, correct?

Dr. Anderson: Yes, you're right. He had been well controlled, I think for almost, I don't know, 20, 30 years. And both were victims of abuse in their homes. But I thought he had been well controlled for decades. And then with Ms. Heard, he was triggered. And they engaged in what I saw as mutual abuse sometimes. I know she led on more than one occasion, and started it to keep him with her because abandonment and having him leave was her worst nightmare. And I think he may have initiated it on occasions too, that I'm less sure on.

Mr. Rottenborn: And how did you come to the understanding that on some occasions Ms. Heard physically abused Mr. Depp?

Dr. Anderson: Ms. Heard reported that.

Mr. Rottenborn: What did Ms. Heard report to you?

Dr. Anderson: That it was a point of pride...two things. It was a point of pride to her if she felt disrespected to initiate a fight, and her father had beaten her, she was not going...And the second one is what she reported to me, which is if he was going to leave her to de-escalate from the fight, she would strike him to keep him there. She would rather be in a fight than have him leave.

Mr. Rottenborn: Did you speak to any other doctors or psychologists that worked with either Amber or Mr. Depp?

Dr. Anderson: No.

Mr. Rottenborn: Did you review any medical documents of Mr. Depp or Amber?

Dr. Anderson: I reviewed a pharmacokinetic that Ms. Heard showed me, which has to do with neurotransmitter function, genetics, and medications.

Mr. Rottenborn: Just to go back, doctor, what professional degrees do you hold?

Dr. Anderson: I have a couple of master's, a Ph.D., and a Certified Clinical Nutrition certification.

Mr. Rottenborn: Would you mind please just elaborating on that for the record?

Dr. Anderson: Yes. I have a master's from early in my life in teaching and curriculum. I have a master's in psych. I have a Ph.D. in clinical psychology. I have a CCN, which is a Certified Clinical Nutrition certification.

Mr. Rottenborn: Do you recall doctor n what year you obtained your Ph.D.?

Dr. Anderson: Yes, I got it in '82.

Mr. Rottenborn: And very briefly, if you could just please in summary fashion, just describe your employment history from 1982 forward after earning your Ph.D.?

Dr. Anderson: I collected clinical hours in hospitals and in psychiatric medical groups. I was employed to do some nutrition evaluation and intervention as well. But there were MDs behind me, we worked in concert. Then worked in a hospital with, I think that doctor was Worker's Comp. And then when I was... You know, I have it out of order. Then I was on my own but I was employed by... This is when I was employed by a psychiatric medical group to do kind of a combination of psychotherapy and some nutrition. And then since then, I have been a solo practitioner, out of network, word of mouth only, very small footprint purposely all of these years.

Mr. Rottenborn: When did you become a solo practitioner?

Dr. Anderson: Very soon, probably in '86.

Mr. Rottenborn: So is it fair to say that as of 2015, you were already quite established as a solo practitioner?

Dr. Anderson: Yes.

Mr. Rottenborn: Generally speaking, what type of services did you provide your patients in 2015?

Dr. Anderson: Adults only, individual or couples work. And with a limited number of people, there would have been neurotransmitter testing and some attention to lifestyle, and how nutritional elements affect the brain.

Mr. Rottenborn: And if you would just please describe for us laypeople what a clinical psychologist does.

Dr. Anderson: The first thing is evaluation intake, gather material. The second thing, and the way I work, is kind of during the intake process could be one session, could be four sessions. It depends on if it's an individual or a couple. I'm conceptualizing. I'm looking for the process. The content is something I make notes on, I care about, it leads me from session to session, but I'm really looking at process, what's going on between two people, or what's actually going on inside of someone.

The third step is, I show my hand, I talk about it. I try to get either three people in the room all on the same page with me, or one other person, this is what I see. And then the onus is on me to not just be a good friend and hold someone's hand and talk about mom, but to actually make change. And so I lay out, here are the things I think we need to work on. And then there are action steps for all of them, so that someone has a more directed sense of what they're doing in

psychotherapy, as opposed to just coming in and talking about how they feel.

Mr. Rottenborn: Is it your practice when you have a session with a couple that you take notes from the session?

Dr. Anderson: I absolutely take notes from any session.

Mr. Rottenborn: At what time in relation to this session do you take the notes?

Dr. Anderson: I'm taking them during the session, and they know it. Because I don't want hours and hours and hours of homework at the end of a clinical day. So, the notes are often, you know, a lot of typos, wrong pronouns here and there but, essentially, I'm just trying to gather facts as I go.

Mr. Rottenborn: Is it fair to say that you take the notes in a somewhat contemporaneous fashion?

Dr. Anderson: Sure.

Mr. Rottenborn: Do you take those notes in the ordinary course of your practice in your business?

Dr. Anderson: Absolutely.

Mr. Rottenborn: Do you maintain or do you keep those notes as part of your treatment and regular ordinary course of business?

Dr. Anderson: I do.

Mr. Rottenborn: Thank you. And what type of information generally do you keep in your notes other than what you've already testified about?

Dr. Anderson: Whatever I want to, anything that...It could be content that I'm tracking, just so I know in the next session what kind of content we were talking about, and it could be process too.

Lucien: Now marked as plaintiff's exhibit 01. Showing 01 on screen

Mr. Rottenborn: Just to confirm, have you seen this document before, Dr. Anderson?

Dr. Anderson: Yes.

Mr. Rottenborn: And what is it?

Dr. Anderson: It's Christian Carino during the first contact, and the second one is from Ms. Heard wanting to know how to get in touch with me.

Mr. Rottenborn: By accepting what's been thrust upon us, when was your first couples therapy involving Ms. Heard?

Dr. Anderson: October 1st, 2015.

Mr. Rottenborn: Was that an in-person session?

Dr. Anderson: Yes.

Mr. Rottenborn: Where was the session held?

Dr. Anderson: In my office.

Mr. Rottenborn: And Mr. Depp was also there, correct?

Dr. Anderson: Yes.

Mr. Rottenborn: How long was that first session?

Dr. Anderson: Three-and-half-hours.

Mr. Rottenborn: Was that the first time that you had ever met Ms. Heard in person?

Dr. Anderson: I think so.

Mr. Rottenborn: And was that the first time you had ever met Mr. Depp in person?

Dr. Anderson: Yes.

Mr. Rottenborn: Okay, now if you could please turn...And this is a multi-page exhibit Mr. [inaudible 01:49:56] did not show you. This is going to plaintiff's exhibit 2.

Judge: Can I interrupt a second, Ben?

Mr. Rottenborn: Sure.

Judge: Adam, can you turn up your microphone? Because everyone's a lot louder than you. And when you object, I struggle to hear you.

Adam: Can you hear me?

Judge: Michelle is a lot louder than you. So, if you talk at the same time, I can't hear you.

Adam: All right. I'll see what I can...yeah, I'll see what I can do.

Judge: Thank you.

Mr. Rottenborn: And Dr. Anderson, if you could just take as long as you would like to familiarize yourself with this document. I'll just state for the record, these are documents that you produced that have a Bates designation 1 through 17.

Dr. Anderson: Yes, I'm familiar.

Mr. Rottenborn: What are these? Oh, well, strike that. Have you ever seen plaintiff's exhibit 2 before?

Dr. Anderson: Yes.

Mr. Rottenborn: What is it?

Dr. Anderson: It's a redacted copy of my personal notes that I provided to you guys.

Mr. Rottenborn: And are these...? I think you testified in response to Mr. Nadelhaft questioning that the names Ann Henry and Joey Davis are pseudonyms?

Dr. Anderson: Yes.

Mr. Rottenborn: And would you please just identify for us who Ann Henry is in real life?

Dr. Anderson: Ann Henry is Amber Heard, Joey Davis is Johnny Depp.

Mr. Rottenborn: And are these your notes that you took contemporaneously of the four couples of...? Strike that. Are these your contemporaneous notes that you took of the couples therapy sessions?

Dr. Anderson: Yes.

Mr. Rottenborn: Would these notes include any session that you had for Ms. Heard that was not part of the couples therapy?

Dr. Anderson: No.

Mr. Rottenborn: Did you have any sessions with Mr. Depp individually that weren't part of the couples therapy?

Dr. Anderson: No. During this period of time, it's color-coded. Black is couples. Red is Ms. Heard. And blue is Mr. Depp. Whether I talked to

them or saw them individually, or as a couple, it was all in service of couples therapy.

Mr. Rottenborn: Understood. And so, these notes in plaintiff's exhibit 2 encompass all of the couples therapy sessions that you had with Mr. Depp and Ms. Heard, either when they appeared together, or when they appeared separately in the context of your couples therapy. Is that correct?

Dr. Anderson: I'm looking at one page. If you're talking about the entire redacted document, yes.

Mr. Rottenborn: And I've asked you the question generally, but I wanna ask you in the context of these 17 pages. Did you prepare these 17 pages of couples therapy notes in the ordinary course of your treatment of Mr. Depp and Ms. Heard?

Dr. Anderson: Yes.

Mr. Rottenborn: Did you maintain or keep them in the ordinary course of your practice or business?

Dr. Anderson: I did.

Mr. Rottenborn: So my question was, what is the significance of October 1, 2015?

Dr. Anderson: I'm going to look at what I'm reading so that this makes sense to you. This can't possibly make sense. But it makes sense to me.

Mr. Rottenborn: Okay.

Dr. Anderson: They reported what they said to one another. So the first line is Ms. Heard talking, saying that Mr. Depp says to her, "No one likes you. You're getting fame from me. I'm falling out of love with you. You're a whore." She's reporting, in the first session, just how bad the relationship is just how mean they are to one another. And at that point, because I'm typing quickly as they go along, I'm switching into a different voice, more about the process between them where she has, I believe, interrupted him. He says no more about what she says about him. And it's just that they're fighting and she has a hard time...She bites the bait. She can't let him talk is my recollection. And from this, that's kind of what that is. So it gives me a sense of what they're doing at home. They're each reporting this is what we say to each other.

Mr. Rottenborn: Okay, I appreciate that. Dr. Anderson. I'm just gonna try to break it down into little bits. So October 1, 2015 is the date of the first couples session, correct?

Dr. Anderson: Yes.

Mr. Rottenborn: And in two-and-a-half means two-and-a-half hours long from start to finish?

Dr. Anderson: I am guessing they were present for two-and-a-half hours, but that I waited...whatever the ledger says, but I waited an hour for them to show up.

Mr. Rottenborn: And Dr. Anderson, in that first bullet point that we can see, you write, "J says, 'No one likes you, getting fame from me, falling out of love with you, whore.'" J is Johnny Depp?

Dr. Anderson: Yes, but that was said by Ms. Heard.

Mr. Rottenborn: So is it fair to say that Ms. Heard was saying that Johnny said to her, "No one likes you. You're getting fame from me. I'm falling out of love with you, whore." That would that would have come from Mr. Depp. Is that correct?

Dr. Anderson: Miss. Heard reported that that's what Mr. Depp said to her at their worst. Yeah.

Mr. Rottenborn: When Mr. Depp told you that Amber hit him in the jaw, did Amber respond in any way? Did she deny it? Did she admit it?

Dr. Anderson: I don't think she denied it. But what I believe from my notes was that she galloped off in a new direction, and they continued to talk, and there was no more that Johnny Depp was going to say about what he was reporting. It was more that they started into a fight. And I wrote that their process is a back-and-forth firing at each other. At that point, he had some energy. And they don't communicate. They have terrible skills.

Mr. Rottenborn: At any point during the first session, did Ms. Heard interrupt Mr. Depp when he was trying to talk?

Dr. Anderson: Yes. She talked over him, she had rapid-fire talking.

Mr. Rottenborn: Did she interrupt him during your other sessions that are reflected in plaintiff's exhibit 2?

Dr. Anderson: Yes. And I pointed out the process to her at some point. And she got it, that no one could actually have a decent dialogue with

her if she was rapid-firing and talking over and just barraging. It was a process issue.

Mr. Rottenborn: You write, "Doesn't answer directly when he asks her a question," to what were you referring there?

Dr. Anderson: Don't have a clue.

Mr. Rottenborn: If I could direct your attention further down the page from plan, you see the notation to October 6th, 2015?

Dr. Anderson: Yes.

Mr. Rottenborn: Was that the second couples session?

Dr. Anderson: No, it's red. It's Amber alone.

Mr. Rottenborn: So is it fair to say that you met alone with Amber for two-and-a-third hours in the context of the couples therapy? Is that correct?

Dr. Anderson: Yes, this was to get her background material.

Mr. Rottenborn: So tell us what you mean in that one section, "He hits her, no closed fist, she hits back, and now starts it for pride because..."

Dr. Anderson: Father.

Mr. Rottenborn: "...hit her." Would you please tell us what you meant by that?

Dr. Anderson: This is her reporting to me. It's the only thing in this clinical session that apparently was about physical abuse, or else it would not have been redacted out. So when she said in terms of physical abuse that he hits her, a no close fist means an open hand slap to me. And she says that she hits back, and now she starts it and sometimes hits him first because her history is having been violated by her father physically. And just out of pride, a lot of things trigger her. And if she's triggered, she would hit him first.

Mr. Rottenborn: And the he you're referring to is Johnny Depp. Correct?

Dr. Anderson: Yes.

Mr. Rottenborn: When you said that she sometimes hits Johnny first because of pride, what did you mean?

Dr. Anderson: She was sensitive to feeling disrespected. And a number of other things, but...And if she felt disrespected, she had come out of

her background history feeling that her pride needed to dominate and she needed to stand up for herself.

Mr. Rottenborn: When Ms. Heard told you that Johnny Depp hits her or slaps her, Johnny Depp was not present. Correct?

Dr. Anderson: Correct. Yeah. And it wasn't plural. It was she referred to...Well, I wrote he hits her, yes. So maybe it was plural.

Mr. Rottenborn: But he was not present when she made that assertion?

Dr. Anderson: He was not.

Mr. Rottenborn: Did Ms. Heard tell you that she socked Mr. Depp?

Dr. Anderson: Yes. She was describing kind of the progression of the physical violence.

Mr. Rottenborn: Did you have any understanding of what she meant when she admitted that she socks Mr. Depp?

Dr. Anderson: Yes. Because there were three lines above this that explained the progression a bit. And I've already said what it was. She felt she had to hit him back if he hit her. And so she always did. And...

Mr. Rottenborn: And, again, that entry is from a session where Mr. Depp was not physically present, correct?

Dr. Anderson: That's right.

Mr. Rottenborn: Okay. Let's move to the next session, October 7th, 2015. And this is a three-and-a-half-hour session. Is that correct?

Dr. Anderson: Yes.

Mr. Rottenborn: Was that an in-person session?

Dr. Anderson: Yes.

Mr. Rottenborn: Did both Mr. Depp and Ms. Heard attend?

Dr. Anderson: No, this is blue. This is Mr. Depp's intake.

Mr. Rottenborn: Understood. And let's move now toward the bottom of the page. And I think I'm finally getting the code right. So the next session occurred on October 14th, 2015. And it was the two of them for three hours. Is that correct?

Dr. Anderson: Yes.

Mr. Rottenborn: And that was another in-person session. True?

Dr. Anderson: Yes.

Mr. Rottenborn: And am I right to say that every single piece of your notes as to the October 14th, 2015 session has been redacted. Is that true?

Dr. Anderson: Yes. But to clarify something earlier on the ledger, I wrote two hours couple then Amber, it means he is the one who walked out of that session.

Mr. Rottenborn: My question was, am I correct that all of your notes for the October 14th, 2015 couples session for three hours are completely redacted. Is that true?

Dr. Anderson: Yes.

Mr. Rottenborn: So, the next session occurred on October 21, 2015. True?

Dr. Anderson: True.

Mr. Rottenborn: And it lasted two hours...It started as a couple, then Mr. Depp left and then you spoke only with Amber but in the context of couples therapy, is that right?

Dr. Anderson: Yeah.

Mr. Rottenborn: Okay, and let's go to the next session on page 10. The next session was on October 24th, 2015. And I can't see from the code, was that a couples therapy or was it just one or the other of them attending?

Dr. Anderson: Oh, no, no. This is a red phone session with Ms. Heard.

Mr. Rottenborn: Okay, great. And it lasted one-and-a-half hours?

Dr. Anderson: Yes.

Mr. Rottenborn: So the next session after that was on October 29th, 2015. Is that right?

Dr. Anderson: Yes. No, that one was canceled.

Mr. Rottenborn: It was canceled. That's why it's so short. Okay. And then the one after that, still on page 10, was on November 12th, 2015.

Dr. Anderson: There's an appointment on 11/4 that was canceled that I didn't put an entry on.

Mr. Rottenborn: Okay. That's helpful. What about November 12th, was that a joint session?

Dr. Anderson: Yes, it was.

Mr. Rottenborn: And was that in person?

Dr. Anderson: Yes.

Mr. Rottenborn: Okay. And then the next session on page 11, is that even I can understand. So there was a no-show on December 4th, 2015. Is that right?

Dr. Anderson: Yes. I'd like to clarify the no-shows.

Mr. Rottenborn: Please do.

Dr. Anderson: I think they both told me but I think Mr. Depp told me at one point, but I already knew because this happens with couples. When a couple is having a lot of trouble in sessions, but they're doing well at home, and they're in a little bit of a honeymoon, you know, period, they cancel instead of coming in because they know coming in we'll get them into conflict.

Mr. Rottenborn: Okay, and fair to say that that happened again on December 10th, 2015?

Dr. Anderson: I can't tell which sessions they were sick or which sessions they were canceling because of this dynamic, but it was admitted and explained to me and I understood it fully.

Mr. Rottenborn: Okay. And still on page 11, the next session was on December 15th, 2015. And it was a telephonic session. Is that right?

Dr. Anderson: Yes, with Ms. Heard.

Mr. Rottenborn: That was with Ms. Heard. Okay. You write, "Then last night, Monday, she slapped him as he sat there talking incoherently." Who slapped who?

Dr. Anderson: I actually know what happened.

Mr. Rottenborn: What happened?

Dr. Anderson: This was, as I said, Ms. Heard talking on the phone to me. Mr. Depp's mother was in ICU. We had been doing a lot of...he was

fucked up, as he would say, on a lot of drugs. And she slapped him because he was being incoherent and talking about being with another woman.

Mr. Rottenborn: Did she tell you that he had hit her first, or was she the one who initiated the slap?

Dr. Anderson: She initiated that one because I think she felt demeaned and threatened.

Mr. Rottenborn: And this is what she reported to you, correct?

Dr. Anderson: Yes.

Mr. Rottenborn: He was not present...he was not on the call when she made these allegations, was he?

Dr. Anderson: No.

Mr. Rottenborn: And you didn't see any of this, did you?

Dr. Anderson: No.

Mr. Rottenborn: And you didn't see her in person?

Dr. Anderson: No.

Mr. Rottenborn: Okay. Then there is a notation, "Should she call police?"

Dr. Anderson: Where is that?

Mr. Rottenborn: That's right below what we were just talking about. In red, it says, "Should she call police?" What does that refer to? So what did you mean...?

Dr. Anderson: That was her asking me.

Mr. Rottenborn: Did you respond to her?

Dr. Anderson: I believe I did.

Mr. Rottenborn: Then you write, "Doesn't want to divorce. Wants to want to divorce."

Dr. Anderson: Yes.

Mr. Rottenborn: What did you mean by that?

Dr. Anderson: She loved him. He loved her. She believed that...she wasn't stupid. She knew that what they were doing wasn't healthy. And

so she wanted to want to divorce him, but she didn't. And yet, it had escalated to this point. So she was trying to figure out what to do. And she had an entourage around her telling her what to do.

Mr. Rottenborn: Who was her entourage?

Dr. Anderson: She had a routine group of friends that stayed with her, lived in her home, probably as well as paid people that I don't know.

Mr. Rottenborn: Do you recall the names of any of her entourage?

Dr. Anderson: One was Rocky.

Mr. Rottenborn: Directing your attention to the last snippet from that session, "Will she have advantage if she leaves him but files with police for abuse first?" Was that a question that she asked you?

Dr. Anderson: Yes. This was her talking out loud trying to strategize for herself.

Lucien: Showing plaintiff's exhibit 3 on screen.

Mr. Rottenborn: And, Dr. Anderson, I think this is the same document that Mr. Nadelhaft showed you as Anderson exhibit 6, so I'm not gonna ask you to identify it again. But I do have a couple of questions about it that Mr. Nadelhaft did not ask. I believe you testified and correct me if I'm wrong, that you have never spoken to any of Ms. Heard's other psychologists or therapists. Is that true?

Dr. Anderson: That's true.

Mr. Rottenborn: And putting that aside, when she refers to her own therapist in this exhibit 3, do you know the name of that person putting aside whether you have ever spoken to him or her?

Dr. Anderson: I do not.

Mr. Rottenborn: Okay. Did Ms. Heard ever explained to you why the nuances and complexity of her relationship with Mr. Depp would be lost on her own therapist?

Dr. Anderson: I believe that she felt known in a more thorough way in terms of her behavior inside of the relationship.

Mr. Rottenborn: And let's pick up where we left off on the bottom of page 11 of plaintiff's exhibit 2.

Dr. Anderson: Okay,

Mr. Rottenborn: And specifically, the entry that begins on January 13...it's at the very bottom of page 11. So literally the last line. Oh, that's it. On January 13, 2016, was this a joint session with Mr. Depp and Ms. Heard, or was this just with one of them?

Dr. Anderson: It was only Ms. Heard...And let me go back and see if it...It was her. No, no, no, I'm sorry. It was in person. No, no, no, no, nevermind, 1/13/16 was Ms. Heard in person.

Mr. Rottenborn: And do you know how long this in-person session was Ms. Heard on January 13th, 2016?

Dr. Anderson: I think it was probably just one hour.

Mr. Rottenborn: Okay. You write, "Didn't fight on island until last day on island started to get into something." What were you referring to there?

Dr. Anderson: Well, Christmas had occurred, and the goal was, they had a lot of people go into his island, and they were going to be together. And the goal was to try and get through the Christmas holiday without fighting. And so she was reporting on that.

Mr. Rottenborn: Then she's...You write, "She got aggressive threatening, didn't touch him, hid in bathroom." What were you referring to there?

Dr. Anderson: What she reported to me, which was an improvement that she didn't participate.

Mr. Rottenborn: So is it fair to say that she told you she did not hit him at that time?

Dr. Anderson: Yes, that's what I believe my notes say. Yes.

Mr. Rottenborn: Then you write, "She threw a can at him since home fighting, then she better." Who is the she who through a can at him?

Dr. Anderson: Ms. Heard.

Mr. Rottenborn: And the him whom she threw a can at was Mr. Depp, correct?

Dr. Anderson: Yes.

Mr. Rottenborn: Did you receive that email on or about March 8th in the morning at 6:23 a.m.?

Dr. Anderson: Well, apparently, because I responded in the morning.

Mr. Rottenborn: Okay. Well, then we'll skip that. We'll go right back to your response. So the response at the top of the page of the second entry, I suppose, did you write that email to Mr. Carino on March 8th, 2016 at 7:27 a.m.?

Dr. Anderson: I did.

Mr. Rottenborn: And fair to say that you weren't enthusiastic about the idea of making a house call?

Dr. Anderson: I was not.

Mr. Rottenborn: And Mr. Nadelhaft asked you about what it was you wanted Johnny to understand about the process?

Dr. Anderson: And I was wrong, because I can see now the date of it, looking at it more carefully, this is after the relationship has devolved considerably. So what I think was guessing was earlier in the relationship. I don't know what it was I wanted him to understand.

Mr. Rottenborn: Let's go back to exhibit 2 then, please. And we're not gonna repeat. We're just picking up where we left off. And now we've gotten up to page 13 of the 17 page of your notes. So, if we can start out...Exactly. Do you see where the notes of your session on June 18th, 2016 began?

Dr. Anderson: Yes.

Mr. Rottenborn: And was this a solo session, couples session, between you and Mr. Depp only?

Dr. Anderson: With Mr. Depp, it's blue. It's just the two of us.

Mr. Rottenborn: Gotcha. And it lasted one-and-a-third hours?

Dr. Anderson: Yeah.

Mr. Rottenborn: You write, "Fight on her April 22nd birthday. He late, huge fight. His mother died on the 20th." I think I know what you're referring to, but if you could please describe that for the record.

Dr. Anderson: One second. This is when I got the Scaramangia Productions on my phone. So he found me at home, which was new. Domestic violence charges had already been made. His mother had just died on the 20th.

Mr. Rottenborn: Well, when he told you that there was a fight on April 22 birthday, was that Ms. Heard's 30th birthday?

Dr. Anderson: I think it was.

Mr. Rottenborn: And is he telling you that he arrives late for the birthday dinner party and there was a huge fight?

Dr. Anderson: Yes.

Mr. Rottenborn: Do you know who Tasya Van Ree is?

Dr. Anderson: Yeah, well, I know her name. I know she was someone that Ms. Heard was in a relationship with.

Mr. Rottenborn: Then you write, "Was chaotic, violence, but gave as good as she got," what does that mean?

Dr. Anderson: I believe I'm quoting...I think I'm quoting what...some of this is just my typing the words he's using while he's talking. He's also very verbal when no one's interrupting him. And I think he talked about how chaotic it was, how violent it was, and she gave as good as she got. That's kind of a direct quote. Those are not my...that's not my language,

Mr. Rottenborn: Directing your attention further down the page to the entry for July 13th, 2016, "Three hours, Amber in person." Was that an in-person meeting you had, a couple therapy with only Ms. Heard?

Dr. Anderson: No, this is not couples therapy. This is Ms. Heard by herself. I wrote in person.

Mr. Rottenborn: Okay. So just to be clear, what follows in...These are your notes for your individual treatment of Ms. Heard having nothing to do with couples therapy.

Dr. Anderson: Not true. In my mind, the dust had not settled on the couple yet. And this was just kind of aftermath of the kind of falling part of the marriage.

Mr. Rottenborn: I didn't mean to mischaracterize anything. I was just trying to suss out what it was.

Dr. Anderson: This is not individual therapy for her. This is about the marriage.

Mr. Rottenborn: If we could please go to exhibit 6, Lucien, which is a new document. When I say new, it was produced by Dr. Anderson's office, but new in the sense that Mr. Nadelhaft didn't ask her about it. Dr. Anderson, have you ever seen this document before?

Dr. Anderson: Of course, I created it.

Mr. Rottenborn: Okay. And what is it?

Dr. Anderson: It's a treatment summary. When I was first subpoenaed or my notes were required years ago, my notes are jumbly. They don't say a lot. They're confusing. They're...you know, as you've seen, or you haven't seen, actually. So, I did what psychologists do. You go through all of those notes and your brain because it's not as if you're not left with, you know, I hope, a very clear sense of what went on. So, I took everything I thought and believed conceptually about them. I went through all of my notes and I wrote this treatment summary.

Mr. Rottenborn: And then if you could go up...

Dr. Anderson: That paragraph its still there.

Mr. Rottenborn: Yeah. And I wanna ask you about that one paragraph. I think you've described this in the course of your testimony, but I did wanna ask you about your sentence, "She reported always hitting him back as a point of pride but admitted that she eventually initiated the hitting herself." Is the she you're referring to Ms. Heard?

Dr. Anderson: It is.

Mr. Rottenborn: And is the him you're referring to Johnny Depp?

Dr. Anderson: It is.

Mr. Rottenborn: Okay, let's move to the next page, please. And I just wanna focus on the one snippet on Bates, page three. You write, "She reported trying to initiate a fight with him one night by slapping him when she was offended by what he said." Is the she your referring to there Ms. Heard?

Dr. Anderson: Yes, it is.

Mr. Rottenborn: And is the he you're referring to Johnny Depp?

Dr. Anderson: Yes, it is.

Mr. Rottenborn: Then in the last sentence, "It was also at this time that she showed me photos of her injuries." When did Ms. Heard show you photos of her alleged injuries?

Dr. Anderson: Well, to the best of my pulling together the information I wrote down, I'm saying it was right after that fight. And my recollection is she came in, she talked to me by phone, and then came in the next day. Or at least I thought that somewhere around the time she got the injuries, I know she came in in person to show me.

Mr. Rottenborn: Did she show you photos or did she show you...?

Dr. Anderson: Both.

Mr. Rottenborn: You said she showed you photos. And so, is it your testimony that she showed you photos of her injuries shortly after the alleged event?

Dr. Anderson: Somewhere in the period while she still had injuries, she showed me photos but she also came in and showed me in person.

Mr. Rottenborn: And what did she show you in person?

Dr. Anderson: Bruising on her face.

Mr. Rottenborn: Other than the bruising on her face, what other injuries did she show you?

Dr. Anderson: I don't remember. There may have been more but I don't remember.

Mr. Rottenborn: And you weren't present during the alleged physical injuries, correct?

Dr. Anderson: Correct.

Mr. Rottenborn: So the only basis you had with respect to the cause of the injuries was what Ms. Heard told you, correct?

Dr. Anderson: Yes.

Mr. Rottenborn: And you write, "The physical violence that occurred between them appeared to me to be mutual." You never actually witnessed any physical violence by Mr. Depp or by Ms. Heard, correct?

Dr. Anderson: Never.

Mr. Rottenborn: And you said that they were each victims of domestic violence in their families. What did you mean by that?

Dr. Anderson: They were each beaten by parents.

Mr. Rottenborn: Go back very briefly to exhibit 2, page 11. And after the part where...this refers to a session that was just you and Ms. Heard, right?

Dr. Anderson: Yes.

Mr. Rottenborn: And this call, which was just between you and Ms. Heard and not Mr. Depp involved, that occurred on or about December 15th, 2015?

Dr. Anderson: Yes.

Mr. Rottenborn: And was it just shortly after that call when Ms. Heard showed you pictures and actually came into your office? Is that right?

Dr. Anderson: She came in on 12/17. So, yes.

Mr. Rottenborn: So Ms. Heard came in on December 17th. And you saw bruises on her face, is that correct?

Dr. Anderson: I believe that's when.

Mr. Rottenborn: Was that bruising that you observed similar to the bruising that appeared on the photographs that she showed you?

Dr. Anderson: Yes.

Mr. Rottenborn: You testified that what you saw in person was similar to what you saw in the photographs Amber gave you, correct?

Dr. Anderson: Yes.

Mr. Rottenborn: When she came into your office on December 17th, what did her face look like?

Dr. Anderson: What I recall is not purple, green, and blue but just a darkening. So, kind of a darker gray-blue sort of thing. But I don't have a photo of it. I don't remember that well.

Mr. Rottenborn: Is that Dr. Anderson consistent with your understanding that there were no other entries on December 15th or December 17th relating to physical abuse?

Dr. Anderson: You know, there was nothing about physical abuse, nothing in that next session. It was all about Christmas, and getting her therapist telling her one thing now...

Mr. Rottenborn: And what was the size of the bruise on her face that you observed on December 17th?

Dr. Anderson: Maybe like this in more than one place, about an inch.

Mr. Rottenborn: You said it was in...So is it fair to say those are small bruises in more than one place? So how many 1-inch size bruises were on her face that you observed?

Dr. Anderson: I'm not a good person to ask this question to. I don't really remember. I wasn't looking to memorize it. I think there's other data that will support this not for me.

Mr. Rottenborn: A few minutes ago, you briefly spoke about seeing bruises about an inch on Amber Heard's face. Do you recall that testimony?

Dr. Anderson: Yes.

Mr. Rottenborn: And you were making motions with your fingers that...

Dr. Anderson: I was saying multiple. I'm not saying one.

Mr. Rottenborn: Right. You were seeing multiple bruises on Amber's face, correct?

Dr. Anderson: Yes.

Mr. Rottenborn: When you were talking about how the size of it, your fingers were under your eyes. Do you remember seeing the bruises under Amber's eyes?

Dr. Anderson: That's what I recall. They may have been in other places throughout her body. I don't remember. But I do remember her face.

Mr. Rottenborn: Can you turn to page 13? In the blue where it says, "Was chaotic, violent," do you know what Mr. Depp was referring to there?

Dr. Anderson: What I said previously, and I'll say it again, he's kind of doing a retrospective of trying to understand the relationship and is characterizing it as chaotic and violent, but she gave as good as she got. And she started it but then...you know, he's complaining but he's also just kind of describing what the relationship was. His mother is dead at this point, the relationship is not good. It's over pretty much. And he's trying to come to terms with it. And he still loves her and is mourning. So he's a very articulate man. And when left alone to speak, he can describe intelligently what's going on. I think while he's talking, and I'm not trying to be obtrusive with my taking notes, I'm listening, I'm talking but I'm also copying down a word here and there. So my belief is that those are his words.

Mr. Rottenborn: And Mr. Depp...I think you testified about this. I just want to make sure clear, Mr. Depp told you, "Amber gave as good as she got," correct?

Dr. Anderson: Correct.

Mr. Rottenborn: Did you ask what Mr. Depp meant by, "Gave as good as she got?"

Dr. Anderson: I was pretty aware of what he meant. I agreed.

Mr. Rottenborn: What did you understand Mr. Depp to mean?

Dr. Anderson: All right. I have. She initiated fights. She started violence. She rose to the challenge if he started first, which I...And so, in my opinion, that had been established throughout the relationship that she fought as hard as he did. And he tried to de-escalate far more than, I think, she did.

Mr. Rottenborn: Did Mr. Depp talk about his fingertip with you before June 18th, 2016?

Dr. Anderson: No, because I would have written it when he first mentioned it to me.

Mr. Rottenborn: Did you ever see Mr. Depp with an injury to his finger during any of your sessions with Mr. Depp, or couple counseling or, you know, sessions together with Amber Heard?

Dr. Anderson: During that session, yes, he showed me.

Mr. Rottenborn: On June 18th, 2016. But before June 18th, 2016, did you ever see an injury to Mr. Depp's finger?

Dr. Anderson: No. But, yes, no, I didn't.

Mr. Rottenborn: When we were going through the incidents where Amber described Mr. Depp being violent, Mr. Depp was not present, correct?

Dr. Anderson: That's true.

Judge: All right. Thank you. All right, ladies and gentlemen, go ahead and take our lunch for the afternoon now. No outside research, don't talk to anybody, and we'll give you until 2:15, okay? So you can be excused with Debbie Lucien [SP] now. Thank you. All right, for this afternoon, do you need this TV anymore for this afternoon for the first witness or...?

Woman: The last one.

Judge: The last one, and so we can put it down during lunch.

Man: [inaudible 02:29:16]

Judge: Okay, perfect. All right. We'll be back at 2:15 then, thank you.

Man: All rise.

Judge: The one we have in the binder, it looks different than the one you had on the screen. So, I'm not sure. The one on the screen looks much more redacted, but maybe this is redacted?

Man: I think the only thing that were redacted was the phone numbers.

Judge: Okay, so the emails are all right, everything...?

Man: I think it's fine with us. I think that what's...we can go back and redact if that's...

Judge: I just wanna make sure because it seemed like the one on the screen had a little more redaction than the one I'm seeing here. So I just...

Man: I didn't think it did but [inaudible 02:30:10].

Woman: I think [inaudible 02:30:13].

Judge: Well, that there are identifiers on here, at least emails. There's no cell phones on here. Those have been redacted.

Man: I didn't think emails were redacted, but I thought they were the same, but I'll do whatever the court...

Judge: No, I don't care. I just wanna make sure everybody agrees that the one that I have is the one that's in evidence.

Woman: I think, Your Honor, the one that was on the screen did, in fact, redact the email addresses also, which is not the same as I think what you have. So, I think we can replace it probably with...

Man: Did you redact it [crosstalk 02:30:42.786]?

Woman: We didn't. David Murphy redacted it.

Man: Okay. I apologize, Your Honor. I apologize. So, yeah, we will provide you the redacted copy.

Judge: So I need a redacted there. Is there any chance in the future that you guys maybe can talk ahead of time and get these redacted ahead of time or something, possibly?

Man: We're trying, Your Honor.

Woman: I think we are figuring that out as we go, Your Honor.

Judge: All right. It's just, I still have three pending redaction now.

Woman: Right. And two of those I think [crosstalk 02:31:11.286].

Judge: Oh, look, with a smile on your face, Mr. Rottenborn, I see that. Okay.

Mr. Rottenborn: We're just trying to make you happy.

Judge: I know, he wants to be the star of the day. That's okay.

Woman: [crosstalk 02:31:16] The first one, we'll just exchange redactions from the review and hopefully [02:31:23].

Judge: All right. So now I have 844, the redacted copy, correct? And I have 210, the redacted copy. Okay. Perfect. All right. So that then just leaves me with 397 then, correct? The one I just...

Woman: Well, there's plaintiff's 548.

Judge: 548 also, okay. 548 and 397 now.

Man: And we expect to have that to you this afternoon.

Judge: Okay. Perfect. All right. Anything else at this time? Oh, good. Okay. Ready for the jury. Your next witness, Mr. Chew?

Mr. Chew: We call Gina Deuters.

Judge: Can you say that again? I'm sorry.

Mr. Chew: Gina Deuters.

Judge: Okay, can you spell that last name for me?

Mr. Chew: D-E-U-T-E-R-S.

Judge: Thank you.

Woman: Do you solemnly swear or affirm to testify truthfully in this case under penalty of law?

Ms. Deuters: [inaudible 02:32:18]

Judge: All right. Thank you. All right.

Mr. Rottenborn: And good afternoon, Ms. Deuters.

Ms. Deuters: Hi.

Mr. Rottenborn: Would you please state your full name for the record?

Ms. Deuters: Yes. It's Georgina Diane Deuters but I go by Gina.

Mr. Rottenborn: Okay. And Ms. Deuters, where are you from?

Ms. Deuters: London.

Mr. Rottenborn: And can you tell us a little bit about what your occupation is?

Ms. Deuters: Currently I am a freelance creator who kind of conceptualized, and shoots, and edits photographs and clips, largely for social media.

Mr. Rottenborn: And how long have you been doing that?

Ms. Deuters: Just a few years. Before that, I was a visual effects coordinator for movies.

Mr. Rottenborn: And can you tell us just very briefly what that means?

Ms. Deuters: It's basically the managing of CG and effects in films, the delivery of and, yeah, just the managing of that. Yeah.

Mr. Rottenborn: And how long did you do that?

Ms. Deuters: Oh, from 2002 to 2016.

Mr. Rottenborn: Okay. Any films we might recognize?

Ms. Deuters: "Charlie and the Chocolate Factory," "The Dark Knight," a terrible Christmas movie that I won't mention, "Pirates of the Caribbean 4?" Yeah.

Mr. Rottenborn: Do you know Johnny Depp?

Ms. Deuters: I do.

Mr. Rottenborn: And how do you know Johnny Depp?

Ms. Deuters: He is a good friend of mine.

Mr. Rottenborn: When did you first meet Mr. Depp?

Ms. Deuters: I met him summer of 2005. It was actually at the "Charlie and the Chocolate Factory" premiere. My husband Stephen introduced me to him at a dinner after the premiere. And, yeah, he was super sweet and warm and kind of ushered us in to join him at dinner. And I remember being very nervous like I am now. And yeah, that's when we first met.

Mr. Rottenborn: Okay. You say your husband Stephen introduced you to Mr. Depp?

Ms. Deuters: Yeah.

Mr. Rottenborn: How did your husband know him?

Ms. Deuters: I'm sorry?

Mr. Rottenborn: How did your husband, Stephen, know Mr. Depp?

Ms. Deuters: Oh, he started working with him on "Charlie and the Chocolate Factory." He started off in production, but then joined the Depp Department during the shoot.

Mr. Rottenborn: And does he still work for Mr. Depp?

Ms. Deuters: Yeah.

Mr. Rottenborn: And in what capacity?

Ms. Deuters: Well, he started off as like a personal assistant and it kind of developed into producer-writer type of role with Johnny's guidance.

Mr. Rottenborn: So for how long has he worked for Mr. Depp then?

Ms. Deuters: Eighteen years, I think. I think since 2004.

Mr. Rottenborn: Now, over those 18 years, where has he been working?

Ms. Deuters: All over the place. It depends on where the film is being shot. So, Bahamas, Hawaii, London, L.A., kind of all over.

Mr. Rottenborn: Where have you been during this time?

Ms. Deuters: Well, Stephen and I, our first two films, we worked on the same film, but then he went off to do Pirates, and I went off to do other films, so I wouldn't always be with them. I know that in between my projects, you know, Johnny was always mindful that me and Stephen didn't spend too much time apart. So he would usually be, you know, kind enough to fly me out to be with them wherever they were.

Mr. Rottenborn: Okay. About how many times would that happen, you know, in a year, if you can estimate for?

Ms. Deuters: Two to three. Yeah. And, you know, sometimes I'd be with them for like a month, sometimes just a couple of weeks.

Mr. Rottenborn: Okay. Can you just generally describe for us very briefly your husband's relationship with Mr. Depp?

Ms. Deuters: It's a great one. So they are very close professionally and personally. I know that Stephen really respects Johnny and looks up to him. And Johnny has been a mentor to him, and has really encouraged Stephen's career develop. And they're great friends, too.

Mr. Rottenborn: And can you just very briefly and very generally tell us what it was like on those time periods when you were spending time, chunks of time with Mr. Depp and your husband?

Ms. Deuters: Well, if the...

Mr. Waldman: Objection, Your Honor, relevance in character testimony [inaudible 02:37:21]. I'm not sure how this all relates to...

Mr. Rottenborn: It's basic foundational facts, Your Honor.

Judge: I'll allow it. That's fine. Go ahead.

Ms. Deuters: Okay, what was the question, sorry?

Mr. Rottenborn: Just generally describe for us...

Ms. Deuters: So if they were working, it would be, you know, like, on wrap, would kind of have dinner together. And then I'd kind of entertain myself while the boys went off to work. If it was during downtime, you know, it would probably be like a family holiday, so it would include his long-term partner Vanessa, and their little kids, which was always really lovely, really happy memories there. So it kind of depended.

Mr. Rottenborn: Okay. How well would you say you know Mr. Depp?

Ms. Deuters: Very well.

Mr. Rottenborn: Over the course of your friendship with Mr. Depp...And I apologize, did you say it had been 17 years?

Ms. Deuters: I'm not great at math. But 2005 to now I think is 17.

Mr. Rottenborn: Okay. Over the course of your friendship with Mr. Depp, have you ever seen Mr. Depp take drugs?

Ms. Deuters: Yes.

Mr. Rottenborn: And which ones?

Ms. Deuters: I've seen him smoke weed and occasionally cocaine.

Mr. Rottenborn: Okay. Have you ever seen him drink?

Ms. Deuters: Yes.

Mr. Rottenborn: All right. Have you ever partaken of any of these substances at the same time?

Ms. Deuters: Yes.

Mr. Rottenborn: Okay. About how many times would you estimate you've seen Mr. Depp use cocaine?

Ms. Deuters: Oh, gosh, I mean, it's usually, like, you know, kind of a celebratory event like after a gig or a party or something. Twenty? I don't know, 20 times over the...Yeah.

Mr. Rottenborn: About 20 times?

Ms. Deuters: Yeah. Yeah.

Mr. Rottenborn: And that's over...

Ms. Deuters: I mean, yeah, I haven't been kind of keeping count but it's not a regular thing. It's sporadic. It is...

Mr. Rottenborn: Okay, and that's 20 times over what period of time?

Ms. Deuters: Gosh, I think like the last maybe 10 years.

Mr. Rottenborn: Okay. And how often have you seen Mr. Depp consume alcohol?

Ms. Deuters: Since I've met him.

Mr. Rottenborn: Can you describe for us how Mr. Depp seems to respond to cocaine?

Ms. Deuters: I quite honestly can't gauge much difference in his demeanor. You know, this stuff kind of tends to make the average person a bit chattier and maybe stays up a bit longer than they should, but nothing out of the ordinary.

Mr. Rottenborn: Okay. Same question for alcohol. How would you say, based on your interactions with him while he's drinking, how does he seem to respond to it?

Ms. Deuters: It's kind of annoying, but he doesn't...holds his liquor very well. So, gosh, kind of more jovial or just...I've honestly never seen him like, drunk-drunk. I've never been with him in that kind of situation.

Mr. Rottenborn: Does he seem to drink to excess in your experience?

Ms. Deuters: No.

Mr. Rottenborn: Okay. Have you ever seen him get angry or violent while on cocaine?

Ms. Deuters: No. Definitely not.

Mr. Rottenborn: Have you ever seen him get angry or violent while on alcohol?

Ms. Deuters: No.

Mr. Rottenborn: Ms. Deuters, do you know Amber Laura Heard?

Ms. Deuters: Yes.

Mr. Rottenborn: And when did you first meet Ms. Heard?

Ms. Deuters: When did I?

Mr. Rottenborn: Yes.

Ms. Deuters: Well, we met kind of very briefly on the set of "The Rum Diary." But, you know, it's just kind of quick greeting in the craft tent, I think.

Mr. Rottenborn: And just so everybody's on the same page, what is "The Rum Diary?"

Ms. Deuters: "The Rum Diary" is a movie that we shot in 2009 in Puerto Rico. And, yeah, it starred Johnny and Amber. And I was there with Stephen. That was one of the times that I wasn't working. So I traveled out to be with Stephen and I was around. I did end up doing another thing for the visual effects department, but mostly it was leisure for me.

Mr. Rottenborn: Was there anything noteworthy about your interactions with Ms. Heard on that occasion?

Ms. Deuters: No.

Mr. Rottenborn: When did you next meet Ms. Heard?

Ms. Deuters: I think a couple of years later, Rum Diary press tour, I went to the premiere in London. And, again, it was just a kind of, you know, greeting. We didn't kind of hang out and chat properly or anything.

Mr. Rottenborn: And again, just so everybody's on the same page, what is a press tour?

Ms. Deuters: A press tour is when a film comes out, the actors and the director usually travel around with the film and show it in different cities

all over the world. And the actors usually have to do interviews to promote it, and just get the word out.

Mr. Rottenborn: Okay. And this was a press tour for Rum Diary?

Ms. Deuters: Yeah.

Mr. Rottenborn: And what city were you in?

Ms. Deuters: I went to the London one.

Mr. Rottenborn: Okay. Does anything stand out to you about your interactions with Ms. Heard on that occasion?

Ms. Deuters: No.

Mr. Rottenborn: Okay. Were you aware at that point that Mr. Depp and Ms. Heard had started a relationship?

Ms. Deuters: Yes.

Mr. Rottenborn: And how were you aware?

Ms. Deuters: Because Depp's team, Johnny's team, sorry, Johnny's team, there's just always an open, constant flow of information, you know, because ultimately, you know, Jerry Judge would be looking after Johnny, so would kind of get updates as to wherever they're going and what he was doing. And so, in that way, we got, kind of, you know, notified that, you know, they'd got together.

Mr. Rottenborn: And you mentioned a name there, Jerry Judge. Can you just tell the jury who that is?

Ms. Deuters: Okay, I don't wanna be upset but Jerry Judge was Johnny's longtime security guy. And he yeah, he was a dear individual. We all loved him very much. And he was like family. He was like a dad and, unfortunately, he passed away.

Mr. Rottenborn: Okay. When did you next see Ms. Heard after the press tour in London?

Ms. Deuters: Okay, so that was like 2011. I think it was on a trip that we accompanied Johnny and Amber on to Las Vegas for a few days.

Mr. Rottenborn: And can you estimate for us just approximately when that was?

Ms. Deuters: Oh, maybe that's 2012. I'm so sorry, like...I am blanking on the date. But it would have been after they, you know, started seeing

each other, maybe a couple of months afterwards. And we just went out there for a few days. I don't remember if it was just like a little excursion for them, or if Johnny had something to do that. I don't remember that. It was just for, like, two, three days.

Mr. Rottenborn: Anything stand out to you about that trip?

Ms. Deuters: I was kind of excited to meet Amber, you know, because she was Johnny's new girl but I remember kind of trying to, you know, kind of make eye contact, and yes, I kind of felt a bit ignored, which is fine, you know, with staff or whatever. So, I didn't really chat with her.

Mr. Rottenborn: When you say staff, what do you...?

Ms. Deuters: I mean, I'm not employed by Johnny but, you know, I'm obviously Stephen's wife and he's staff and, yeah, I didn't really interact with her.

Mr. Rottenborn: Okay. So can you kind of describe what happened when you saw her then if anything?

Ms. Deuters: No, nothing of note, just that she didn't really engage or make, you know...yeah, just didn't really acknowledge our presence.

Mr. Rottenborn: Did you see Mr. Depp and Ms. Heard interact at all on that trip?

Ms. Deuters: Yeah.

Mr. Rottenborn: Okay. And can you describe that for us?

Ms. Deuters: They seemed pretty in love. They were tactile and, you know, they seemed happy.

Mr. Rottenborn: Okay. When did you next meet Ms. Heard?

Ms. Deuters: When Johnny and Stephen had gone out on location to shoot "The Lone Ranger." So I think that might have been the next year. [inaudible 02:48:11]. Sorry. Yeah. So, you know, I think through Johnny and Stephen, Amber and I were kind of put in touch and we went vintage shopping together and went to get a coffee once. And then with Johnny and Stephen kind of looked around some galleries, art galleries.

Mr. Rottenborn: About how long would you say the period was that you and Ms. Heard were together in this timeframe?

Ms. Deuters: How long were we both out on vacation?

Mr. Rottenborn: Right.

Ms. Deuters: I'm not sure about her...I know that I personally made two trips, which seemed to coincide with her being there. So, you know, it was nice. And, you know, kind of meeting up to go vintage shopping, she was really, really lovely, really sweet. We got on very well. And it was fun. Yeah. She was very charming.

Mr. Rottenborn: Did you discuss her relationship with Mr. Depp at all?

Ms. Deuters: I remember like going for a coffee, and she seemed just a bit kind of frustrated that...I don't think Johnny was ready to go public with their relationship yet. And I think that was, you know, frustrating for her.

Mr. Rottenborn: Did you form an impression that she wanted to go public immediately?

Mr. Waldman: Objection, speculation as to what Ms. Heard was thinking.

Judge: All right, I'll sustain as to speculation. Next question.

Mr. Rottenborn: Were you out in public?

Ms. Deuters: Yeah. Yes.

Mr. Rottenborn: When you were interacting with Ms. Heard in this timeframe, did you notice at all whether she was wearing makeup?

Ms. Deuters: No, I don't think she was wearing makeup. She's naturally beautiful. I remember, you know, just thinking how gorgeous her skin was and how, yeah, pretty she was.

Mr. Rottenborn: And I mean, how could you tell that she wasn't wearing makeup?

Ms. Deuters: Well, I consider myself to be quite the makeup expert. You know, earlier on in my adult life, I kind of got on hormonal acne, which was awful. So I got kind of professional at covering that up. So I think I'm pretty good at telling if someone's wearing, you know, like, foundation or concealer.

Mr. Rottenborn: Have you ever heard of Arnica cream?

Ms. Deuters: Yes. In fact, I actually was using it the other week.

Mr. Waldman: Objection, Your Honor.

Judge: You can use the microphone. I was having trouble hearing you. I'm sorry. Oh, there you go. It's on.

Mr. Waldman: The question was, have you ever heard of it? And she answered it. That continued past so it's...

Judge: All right, she's answered the question.

Mr. Waldman: She's answered the question.

Judge: All right. You wanna ask another question?

Mr. Rottenborn: Sure, Your Honor. What is it?

Ms. Deuters: It's a homeopathic lotion that you use to help bruises heal faster.

Mr. Rottenborn: And have you ever used it yourself?

Ms. Deuters: Yes, I was using it a couple of weeks ago because I had a huge bruise on my hip after I had a fall. So I know what it is.

Mr. Rottenborn: And can you just describe for those of us who have no idea, like myself, what does Arnica cream look like?

Ms. Deuters: So that was me. It's kind of like a white emollient cream, opaque, that you rub into your skin, you rub into the bruise.

Mr. Rottenborn: Once it's been rubbed in, what does it look like?

Ms. Deuters: Transparent.

Mr. Rottenborn: Okay, so is the bruise still visible?

Ms. Deuters: Absolutely. Yeah.

Mr. Waldman: Leading.

Judge: I'll sustained as to leading.

Mr. Rottenborn: All right, after those interactions with Ms. Heard on the set of Lone Ranger in, did you say 2013?

Mr. Waldman: Already testified as to the date.

Judge: I'm not sure if that's an objection, but...

Mr. Rottenborn: I'll withdraw the date, Your Honor.

Judge: All right. Just remember...

Mr. Rottenborn: After your interactions with Ms. Heard on the set of "The Lone Ranger," Ms. Deuters, when do you next recall seeing Ms. Heard?

Ms. Deuters: I think it was on the press tour for "The Lone Ranger." By that point, I believe their relationship was public. And we traveled to Japan with their kids, Johnny's kids, and her friend, Brittany, who I think was, you know, along as Amber's friend, but also to help take care of the kids while, you know, Johnny was working and...

Mr. Rottenborn: Why were you traveling to Japan again?

Ms. Deuters: Because "The Lone Ranger" was premiering there and they were doing press. And then we also traveled like to Berlin, I think as well, and all around.

Mr. Rottenborn: Were you traveling with Mr. Depp and Ms. Heard?

Ms. Deuters: Yes.

Mr. Rottenborn: Okay. Did you witness any interactions between Mr. Depp and Ms. Heard on these trips?

Ms. Deuters: I mean, just generally on the plane, nothing to note, there was an incident like when we were all at dinner together. And when I say we all, I mean, also the other actors and the producers and director. And I noticed that Johnny was kind of hiding a drink on the side of his chair and taking secret sips. And I noticed, you know, she kind of saw that and was quite angry about it. And I couldn't hear what was said but he seemed to be kind of getting...got told off by...you know, the telling off, which it was kind of weird, it was a bit like telling off a child.

Mr. Rottenborn: What was he drinking?

Ms. Deuters: I think it was Champagne.

Mr. Rottenborn: Okay. Like a flute of Champagne?

Ms. Deuters: Yes. Something like that.

Mr. Rottenborn: Do you have any impressions of...? How would you describe their body language when they were having this conversation?

Ms. Deuters: You know, I think she was really angry. So, yeah, just kind of like dominant and just very angry and, you know, I think just telling, you know, him off.

Mr. Rottenborn: Okay. And how would you describe his body language?

Ms. Deuters: I think, you know, quite just exhausted by the whole being told off like a child.

Mr. Rottenborn: Okay. Over this period of time, and just to clarify, were Ms. Heard and Mr. Depp public at this point?

Ms. Deuters: Yes.

Mr. Rottenborn: Okay. So it was...

Ms. Deuters: Yeah. Well, I mean, when we arrived at airports, there was like photographers everywhere so we...you know, it wasn't very public. Yeah.

Mr. Rottenborn: Okay. Over this period of time then after they've gone public, did you ever witness them together? Did you have a perspective on their interactions in general?

Man: Objection, relevance, foundation...

Judge: Is your mic...is it on?

Man: I pushed it. I'm sorry.

Judge: There, now it is. Okay, thank you. All right, objection.

Man: Relevance, foundation, leading.

Mr. Rottenborn: Well, their interactions are directly relevant, Your Honor. I can lay more foundation if the court wants.

Judge: If you're going to lay foundation, that's fine.

Mr. Rottenborn: Did you ever witness Ms. Heard and Mr. Depp together in this time period?

Ms. Deuters: I'm sorry. Could you repeat it? Sorry. I know you said it a few times. But could you just repeat it one more time?

Mr. Rottenborn: Of course. Over this next couple of years after the press tour for Lone Ranger, did you have occasion to interact with Mr. Depp and Ms. Heard at the same time? Did you see them together?

Ms. Deuters: Very rarely.

Mr. Rottenborn: Okay.

Ms. Deuters: Yeah. I'm thinking maybe a dinner here or there.

Mr. Rottenborn: Okay. From those occasions when you did see them, did you form any impressions about how they were getting along based on their interactions with each other that you personally witnessed?

Man: I still don't think it's established the foundation. It's been a few times that he saw a couple of dinners and he's asking for her perspective on the relationship.

Mr. Rottenborn: On those particular occasions.

Judge: What's the relevance of her impressions?

Mr. Rottenborn: I'll rephrase.

Judge: Okay.

Mr. Rottenborn: How would you describe their interactions on those occasions when you witnessed them?

Man: It's the same. Same thing, Your Honor. It's still no foundation.

Mr. Rottenborn: If she is present...

Judge: I'll allow it, it's fine.

Ms. Deuters: They seemed okay. I mean, you know, they could be quite tense but nothing to note. Nothing I would remark on.

Mr. Rottenborn: Were you invited to their wedding?

Ms. Deuters: Yeah. Yes.

Mr. Rottenborn: And did you attend?

Ms. Deuters: Yes.

Mr. Rottenborn: Can you just generally describe for us what the wedding was like?

Ms. Deuters: It was definitely a predominantly Amber event, in the sense that a large percentage of the guests were her friends and family. And, you know, a lot of his friends and family couldn't make it because it seemed to happen so quickly. And yeah, they seemed to be having...her and her friends seemed to be having a wonderful time.

Mr. Rottenborn: Where did the wedding take place?

Ms. Deuters: On Johnny's island in the Bahamas.

Mr. Rottenborn: And did you have any interactions with Ms. heard during this time period? Or did you talk to Ms. Heard when you were at the wedding?

Ms. Deuters: Yeah. You know, there were dinners. And it was certainly, you know, a celebration every day. You know, Amber and her friend Rocky gave me my first taste of MDMA. You know, everyone, like all her friends were on it. And so I tried that for the first time with them. Yeah, it was like a party atmosphere.

Mr. Rottenborn: Okay. Just briefly, can you sketch out for us in a little more detail how you came to take MDMA at the wedding?

Ms. Deuters: Oh, well, it was evening time. I think I was a bit hungover from the day before. And I can imagine those two saw me, and when they first dropped the pill into my hand, I thought it was like a supplement, like a vitamin supplement to make me feel better. But no, they quickly said it was MDMA. And I kind of decided to throw caution to the wind and just try it.

Mr. Rottenborn: You mentioned that you traveled with Mr. Depp and Ms. Heard to Japan, and Berlin, and possibly other locations as well. Can you tell us where else you traveled with them?

Ms. Deuters: Well, after the wedding, we headed to Australia.

Mr. Rottenborn: And why did you go to Australia?

Ms. Deuters: Because that's where Johnny would be shooting Pirates 5.

Mr. Rottenborn: Okay, and approximately when do you think you were in Australia?

Ms. Deuters: I think that I flew with Johnny and Jerry Judge, and Stephen, and a few others, I think it was February. And Johnny stayed in a house. And Stephen and I were based, like a 35-minute drive away on the shoreline in the hotels. And I think Amber flew in a while afterwards.

Mr. Rottenborn: Okay. You said you thought it was February. Do you recall the year?

Ms. Deuters: Yes, I do, 2015.

Mr. Rottenborn: Okay. So just so we have the cast of characters clear, who from this group was in Australia at this point?

Ms. Deuters: So on the plane that I was on, it was Johnny, Jerry Judge, Stephen Deuters, Debbie Lloyd, and myself, and maybe one other.

Mr. Rottenborn: Okay. And you mentioned a name there I don't think we've heard before. Can you just tell the jury quickly who Debbie Lloyd is?

Judge: Okay. Ladies and gentlemen of the jury, we just have to take a few housekeeping matters up. So we're just gonna have you take a recess for a few minutes, okay? So, again, no outside research and don't talk to anybody, okay?

Woman: All right. Ms. Deuters, I just had a question for you. Have you been watching the trial this past week?

Ms. Deuters: I've seen clips of it online. Yeah.

Woman: You've been watching so you have seen parts of this trial?

Ms. Deuters: Yeah.

Woman: Okay. And witness testimonies?

Ms. Deuters: Yeah, I've seen clips.

Woman: You've seen them. All right. Does anybody have any follow-up questions?

Man: Ms. Deuters, have you been watching...?

Woman: It doesn't matter. She's been watching clips of witness testimony. All right, you're excused, ma'am. You're excused.

Ms. Deuters: Okay.

Judge: Thank you. I will instruct the jury to have to strike the testimony of Ms. Deuters. There's a rule on witnesses, Mr. Monas [SP].

Man: Understood, Your Honor, this is the first we're...

Judge: I believe that. I have no doubt in my mind that this is the first you've heard of it. Have a good day, ma'am. Thank you. I [inaudible 03:05:19] the first time. Thank you. Your next witness is gonna be on deposition, right?

Mr. Chew: Yes, Your Honor, it's gonna be on video.

Judge: Okay. All right. Did you wanna take the afternoon recess now before we...? Because your video...I'll take the afternoon recess, then I'll instruct the jury, okay? All right. We'll take 15 minutes. Let's come back at 3:15.

Man: All rise.

Judge: Oh, goody. Which exhibit is this?

Woman: This is 397 with the redactions.

Judge: Okay, and make sure they're agreeable redactions first. All right, so 397 with these redactions. Okay. If I don't give it to Jamie now, I'll forget. Okay. All right, that takes care of 397. Now, we're gonna have to probably start the video tonight and probably have to finish it tomorrow morning, correct, by the length of it?

Man: Yes, [inaudible 03:06:34].

Judge: Okay. And are the exhibits...? So you're gonna be switching back and forth again?

Mr. Rottenborn: I think, Your Honor, that we're just gonna run this off of ours. I believe the parties have worked out the redactions, I think, I could be wrong.

Judge: Is there any objections to the exhibits?

Mr. Chew: I don't think we've talked at all about what exhibits were coming in.

Judge: That's music to my ears.

Mr. Chew: I know. I don't think we had any...we've just exchanged the objections for this.

Mr. Rottenborn: Oh, well, in that in that case, I think we're handling introducing them to the extent they get introduced and we'll discuss any objections.

Man: Right. That's how I understand it. We'll have a witness that...

Judge: Oh, so we're just gonna do objections as we get to them?

Man: Yes.

Judge: That's fine. I don't have a problem with that. That works out. Okay. So we'll start it and when we're at 5:00, we'll see where we are, and we'll find a good breaking point, okay? All right. Are we ready for the jury then? Make sure you're ready.

Man: I'm ready.

Judge: okay. All right. You're ready? All right, thank you.

[03:07:33]

[silence]

[03:08:35]

Thank you, ladies and gentlemen. Ladies and gentlemen, the court is striking Ms. Gina Deuters' testimony in its entirety from the record. Okay? Therefore, the court further instructs you, the jury, to disregard her testimony in its entirety. Understand? All right. Thank you. All right, your next witness?

Mr. Rottenborn: Your Honor, we call Dr. David Kipper by video designation.

Judge: All right, Dr. Kipper.

Mr. Rottenborn: ...and I represent Amber Heard. Could you please provide your full name?

Dr. Kipper: David Alan, A-L-A-N, Kipper, K-I-P-P-E-R.

Mr. Rottenborn: And what is your business address, Dr. Kipper?

Dr. Kipper: 153 South Lasky, L-A-S-K-Y, Drive, Beverly Hills, 90212, California.

Mr. Rottenborn: You're a doctor, correct?

Dr. Kipper: Yes.

Mr. Rottenborn: An internist?

Dr. Kipper: Yes.

Mr. Rottenborn: How long have you been practicing medicine?

Dr. Kipper: Since 1977.

Mr. Rottenborn: And I noticed on your website it says you provide concierge healthcare, what does that mean?

Dr. Kipper: That means I provide healthcare on a retainer-based arrangement.

Mr. Rottenborn: What do you mean by retainer-based arrangement?

Dr. Kipper: Patients pay an annual fee, and all services are included. And I'm available 24/7.

Mr. Rottenborn: Now, you also practice...part of your practice is addiction treatment, is that correct?

Dr. Kipper: Correct.

Mr. Rottenborn: And you've written a book on addiction?

Dr. Kipper: Yes.

Mr. Rottenborn: Oh, what's the title of the book?

Dr. Kipper: "The Addiction Solution."

Mr. Rottenborn: And by addiction, do you mean addiction to drugs and alcohol?

Dr. Kipper: Yes.

Mr. Rottenborn: Is there any other addictions that you practice treating?

Dr. Kipper: Well, there are behavioral addictions but those are far less common.

Mr. Rottenborn: And in your practice, you've dealt with patients who blacked out from drugs or alcohol?

Dr. Kipper: Yes.

Mr. Rottenborn: Who is Lisa Bean?

Dr. Kipper: A former employee in my office.

Mr. Rottenborn: And what was Ms. Bean's role in your office?

Dr. Kipper: She was a receptionist.

Mr. Rottenborn: And how long did Ms. Bean work for you?

Dr. Kipper: I don't have that specific information. I believe it was about three years.

Mr. Rottenborn: And working with Ms. Bean, did you find her to be honest?

Dr. Kipper: No, actually.

Mr. Rottenborn: Why was she not honest?

Dr. Kipper: She was inappropriate with certain patients, beyond what I consider to be professional. She discriminated in some regards to some patients. She was divisive in the office and created a lot of problems with the other staff.

Mr. Rottenborn: Did you terminate her?

Dr. Kipper: Oh, no, she quit.

Mr. Rottenborn: And who is Debbie Lloyd?

Dr. Kipper: Debbie Lloyd is a nurse that I have known for many years who has worked with me on home care and addiction cases.

Mr. Rottenborn: And is Ms. Lloyd an employee or a contractor with you?

Dr. Kipper: She's a contractor.

Mr. Rottenborn: Does she still contract with you, Ms. Lloyd?

Dr. Kipper: Yes, until recently, she now has a new position, so I'm not able to have her services at this point.

Mr. Rottenborn: What was Ms. Lloyd's role in Mr. Depp's care?

Dr. Kipper: She served as his RN, as his registered nurse.

Mr. Rottenborn: And was Ms. Lloyd paid by you for Mr. Depp's care?

Dr. Kipper: Yes.

Mr. Rottenborn: So would it work that you would bill Mr. Depp for the care that you gave and Ms. Lloyd gave and then pay from that?

Dr. Kipper: Yes.

Mr. Rottenborn: And who is Erin Boerum [SP]?

Dr. Kipper: She's an RN that was employed to help care for Amber.

Mr. Rottenborn: Was Ms. Boerum also a contract nurse?

Dr. Kipper: Yes.

Mr. Rottenborn: And so did Ms. Boerum have any role in Mr. Depp's care?

Dr. Kipper: If Debbie was unavailable, Erin would step in and vice versa.

Mr. Rottenborn: And did Ms. Boerum work with you on anybody else besides Mr. Depp or Ms. Heard?

Dr. Kipper: Yes.

Mr. Rottenborn: And does Ms. Boerum still work with you?

Dr. Kipper: Ms. Boerum now has two little kids, so she's not really available.

Mr. Rottenborn: I understand. I have two kids myself. When were you first contacted about treating Mr. Depp?

Dr. Kipper: Somewhere in the spring of 2014.

Mr. Rottenborn: And do you recall who first referred you to Mr. Depp?

Dr. Kipper: He was referred by another patient.

Mr. Rottenborn: Did you talk to Tracey Jacobs at all about Mr. Depp?

Dr. Kipper: Yes.

Mr. Rottenborn: What did you understand the business relationship was between Ms. Jacobs and Mr. Depp?

Dr. Kipper: That she was his agent.

Mr. Rottenborn: Why don't we put up...Alex, can you put up Kipper 3, please?

[03:15:13]

[silence]

[03:15:36]

Dr. Kipper, do you recognize this document?

Dr. Kipper: Yes, I do.

Mr. Rottenborn: And what is it?

Dr. Kipper: This is an intake evaluation that I had with Mr. Depp regarding his treatment.

Mr. Rottenborn: And do you keep these notes in the normal course of business?

Dr. Kipper: Yes.

Mr. Rottenborn: And the notes are meant to be accurate?

Dr. Kipper: Yes. Yes.

Mr. Rottenborn: And did you take the notes or did someone take them for you?

Dr. Kipper: I took these notes.

Mr. Rottenborn: Is May 22nd, 2014 the first time that you met Mr. Depp?

Dr. Kipper: No.

Man: Your Honor...Thank you. Your Honor, I move to admit the defendant's exhibit 220, which is what Dr. Kipper was referring to there.

Judge: Any objection to 220, defendant's 220?

Man: Yes, Your Honor. Foundation, authentication, hearsay, and 403.

Judge: All right. Let me get...I can get it here. That's fine.

Mr. Rottenborn: And, Your Honor, Dr. Kipper testified just now that these are his notes that he keeps in the regular course of business of his meeting with...his initial consultation with Mr. Depp, which is what he does as a doctor, you know, and it's his medical records of his report with Mr. Depp. So I think he's established the foundation of that.

Judge: All right. Yes, sir. A response, Mr. Monas?

Man: We're just having a slight technical issue pulling up the exhibit, Your Honor, I apologize. One minute.

Judge: Okay, that's fine.

[03:17:32]

[silence]

[03:18:37]

Mr. Rottenborn: Your Honor, we would stand on the hearsay and relevance objections. There's a lot of material in this document that is not really germane to the issues in this case, at minimum, and to the extent it should be admitted in redacted form. In addition, it's not clear that there's any hearsay exception that would apply to everything in here. Not everything in here is a statement of a hardy opponent, I don't believe. And finally, the medical records reflected here go well beyond any possible relevance to the issues in this case. It's not inappropriate we would stand on that objection.

Man: All the statements in here are statements of Mr. Depp. So they'd either be a party admission or it's the use of...and it's Dr. Kipper's...it's his evaluation of Mr. Depp to treat him for, as you'll see, his addictions. So I think this is all relevant. There's no hearsay and if there is, it meets the exception as it's all Mr. Depp's statements. They've not even argued it, but it's clearly a business record.

Mr. Rottenborn: It's clear from the document, Your Honor, that there's more in here, that the records here are, at minimum, broader than is germane to this case. I mean, this goes well beyond any medical

records that could conceivably be relevant, we would respectfully submit to the issues in this case.

Judge: I understand but given latitude as to the family history and family medical history to this, so I'll allow 220 into evidence. Okay?

Man: Okay. Understood, Your Honor.

Judge: All right.

Mr. Rottenborn: Thank you, Your Honor. I guess, can we publish it to the jury?

Judge: Not if you're watching...

Mr. Rottenborn: Oh. Well, the way we've...That's fine, Your Honor. We can just have him testify and then...it's fine, [crosstalk 03:20:28.213]

Judge: Okay, that's fine. All right, thank you.

Mr. Rottenborn: Thank you, Your Honor. [inaudible 03:20:31]...Mr. Depp prior to May 22nd, 2014?

Dr. Kipper: I met him a couple of months before that as just an initial introduction to discuss possible treatment.

Mr. Rottenborn: And where were you when you first met Mr. Depp?

Dr. Kipper: He met me at my home office.

Mr. Rottenborn: And were there any...Did you have any notes of that meeting at the home office?

Dr. Kipper: No.

Mr. Rottenborn: What did you discuss with Mr. Depp at that first meeting?

Dr. Kipper: At that meeting, I discussed with him my involvement in helping him with his substance issues.

Mr. Rottenborn: And what substances issues did he say he had?

Dr. Kipper: So, to answer your question, Mr. Depp was seeking treatment for substance abuse and wanted to detoxify from his substance abuse.

Mr. Rottenborn: Did Mr. Depp say what substances he was trying to detox from?

Dr. Kipper: Yes. And as indicated in this note, it was polysubstance. So there was alcohol, opiates, benzodiazapines, and stimulants.

Mr. Rottenborn: So, you referenced the note, which is Kipper 3, in your meeting with Mr. Depp in the months before May 22nd, 2014. Mr. Depp was looking to detox from alcohol, opiates, benzo, and cocaine?

Dr. Kipper: Those substances were in his history. The substance that he was, at that point, concerned about and abusing were opiates.

Mr. Rottenborn: And when you say he was concerned about the substance he was abusing was opiates, was this in the conversation before May 22nd, 2014?

Dr. Kipper: I can't remember.

Mr. Rottenborn: Okay. So you had this initial conversation with Mr. Depp, and then you had this initial consultation with him a few months later, is that correct?

Dr. Kipper: Yes, that's correct.

Mr. Rottenborn: And you met with Mr. Depp in Boston?

Dr. Kipper: Yes.

Mr. Rottenborn: And Mr. Depp was filming a movie at the time?

Dr. Kipper: Yes.

Mr. Rottenborn: And in your notes, you say he had a history of self-medicating behaviors involving multiple substances of abuse. These include alcohol, opiates, benzodiazapines, and stimulants, cocaine. Is that accurate what he told you?

Dr. Kipper: Yes. That statement's in my notes. Correct.

Mr. Rottenborn: Okay. And in addition to opiates, was Mr. Depp addicted to any other prescription drugs?

Dr. Kipper: No. Other than opiates, no.

Mr. Rottenborn: What is Roxicodone?

Dr. Kipper: It's an opiate.

Mr. Rottenborn: And what is Adderall?

Dr. Kipper: Adderall is a stimulant.

Mr. Rottenborn: Okay. And was Mr. Depp addicted to Adderall?

Dr. Kipper: No.

Mr. Rottenborn: What is Xanax?

Dr. Kipper: Xanax is a benzodiazapine.

Mr. Rottenborn: This first paragraph on this page, these are notes based off of your discussion with Mr. Depp?

Dr. Kipper: Yes.

Mr. Rottenborn: And then on the second page where it says physical examination, that's just what you conducted at the time on Mr. Depp?

Dr. Kipper: Yes.

Mr. Rottenborn: And where it says "Impression" on the third page, that was your impression of Mr. Depp at the time of May 22nd, 2014?

Dr. Kipper: Yes.

Mr. Rottenborn: And under that, "The Plan," that's documenting your plan for Mr. Depp going forward?

Dr. Kipper: Correct.

Mr. Rottenborn: And Mr. Depp paid for this visit?

Dr. Kipper: Yes.

Mr. Rottenborn: When was the plan to start treatment of Mr. Depp?

Dr. Kipper: After he completed his current film.

Mr. Rottenborn: Dr. Kipper, do you recognize Kipper exhibit 4?

Dr. Kipper: Yes.

Mr. Rottenborn: And what is Kipper exhibit 4?

Dr. Kipper: It's a progress note dated June 11th, '14, 2014.

Mr. Rottenborn: And did you keep these notes in the normal course of business?

Dr. Kipper: Yes.

Mr. Rottenborn: And did you take these notes?

Dr. Kipper: Yes.

Mr. Rottenborn: And the notes are meant to be accurate, correct?

Dr. Kipper: Yes.

Mr. Rottenborn: You've mentioned it before, but what is polysubstance abuse?

Mr. Rottenborn: Your Honor...

Dr. Kipper: Poly it is multiple.

Mr. Rottenborn: You can pause. Thank you.

Judge: It takes a second for it to catch up.

Mr. Rottenborn: No, I understand. Thank you. Your Honor, I move to the admission of defendant's exhibit 246.

Judge: 246.

[03:26:18]

[silence]

[03:26:41]

Mr. Rottenborn: And it's the same type of medical record that was just admitted for 220.

Judge: Any objection? I'll give you a moment to read it.

Mr. Rottenborn: Thank you, Your Honor. Just one moment.

[03:26:55]

[silence]

[03:27:11]

Understanding Your Honor's ruling on the last record, I think we'll anticipate that the exhibit can come in.

Judge: All right, so I will take that as no objection. All right, 246 in evidence. Thank you.

Mr. Rottenborn: Thank you.

Dr. Kipper: Multiple substance issues, multiple substance abuse.

Mr. Rottenborn: And you were gonna be treating Mr. Depp for multi-substance abuse, correct?

Dr. Kipper: I was gonna be treating Mr. Depp for opiate issues.

Mr. Rottenborn: On the bottom of the first page, where it says "Impression," that was your impression of Mr. Depp at the time, where it says polysubstance abuse?

Dr. Kipper: Yes.

Mr. Rottenborn: And were these the drugs that Mr. Depp was taking at the time, which is at the bottom of page 1 of paper 4?

Dr. Kipper: I'm sorry, am I relating to the first entry under "Impression?"

Mr. Rottenborn: It says...What does it mean where it says, "Dopaminergic imbalance with lithium 300mg TID to be increased to 300mg TID?"

Dr. Kipper: Those are medications that I had planned to use upon our treatment.

Mr. Rottenborn: For all the medications that are on Kipper 4 under "Impression," those are medications you planned to use with Mr. Depp, is that correct?

Dr. Kipper: That's correct.

Mr. Rottenborn: And on the next page where it talks about opiate dependence, you write, "We'll maintain on current Norco dosage TID until current filming is completed in mid to late July. Mr. Depp agrees to undergo detoxification with Clonidine, Robaxsan, Bentyl, and anxiolytics." I can't pronounce that. I'm sorry. But is that correct?

Dr. Kipper: Yeah, you did a good job. That's what it says. Yes.

Mr. Rottenborn: What does TID mean? You see where it says...?

Dr. Kipper: Three times a day.

Mr. Rottenborn: Three times a day. Okay. And Mr. Depp was also gonna undergo a sobriety program, is that correct?

Dr. Kipper: Yes.

Mr. Rottenborn: And it says, "To be regularly drug tested in my office." How regularly was he to be drug tested, Mr. Depp?

Dr. Kipper: That was dependent upon his progress and my understanding of how he was doing.

Mr. Rottenborn: And if he was progressing well, how often would Mr. Depp be drug tested? You can answer.

Dr. Kipper: The answer is what I said, it would really depend on how he was doing at the time and how he was progressing through his treatment.

Mr. Rottenborn: Do you recall how many drug tests you gave Mr. Depp in 2014?

Dr. Kipper: No.

Mr. Rottenborn: You gave him at least one, correct?

Dr. Kipper: Yes, I believe so. I'd have to check through my records.

Mr. Rottenborn: Okay. And Deborah Lloyd was gonna be Mr. Depp's nurse, correct?

Dr. Kipper: Correct.

Mr. Rottenborn: You can take down Kipper 4. And can you put up Kipper 5, please? And, Your Honor, we would move into evidence plaintiff's exhibit 40.

Judge: Plaintiff's exhibit 40? Is there any objection?

Man: So my understanding, you're putting in...you want to move in the entire document [03:31:31]?

Mr. Rottenborn: We have redacted portions of it. Yeah.

Man: Okay.

Mr. Rottenborn: [inaudible 03:31:39] It's just 40.

[03:31:53]

[silence]

[03:32:18]

Your Honor, I would just have to look to make...you know, I'm generally okay with it. With 123 pages and then there's certain redactions, I just would need to see what was redacted. I'm generally okay with the majority of the document.

Judge: All right, so I'll enter it but with reservation for redactions that need to be made, okay?

Mr. Rottenborn: Thank you, you Honor.

Man: Understood.

Judge: We can do that. All right, that's fine, 40.

[03:32:42]

[silence]

[03:33:02]

Mr. Rottenborn: So I don't know if they're thinking of publishing it, but I would ask that they not publish it and just let the video play as he testifies to it, and then we can discuss what needs to be.

Judge: Is that okay?

Mr. Rottenborn: Given the lack of confirmed agreement on the redactions, Your Honor, I think that's fine if you play the video.

Judge: Okay. Sure. We can do that.

Mr. Rottenborn: Thank you.

[03:33:19]

[silence]

[03:33:40]

Okay. And Kipper 5 is a long document that came out of your files. Do you recognize the document?

Dr. Kipper: Yes.

Mr. Rottenborn: What is Kipper 5?

Dr. Kipper: It's a progress note dated the 12th of June, 2014.

Mr. Rottenborn: So this exhibit Kipper 5, which I will refer to throughout your deposition is a multi-page document that is progress notes throughout from multiple dates that came out of your files. Do you know who created these progress notes?

Dr. Kipper: I created these progress notes.

Mr. Rottenborn: It wasn't Ms. Lloyd?

Dr. Kipper: No, these are my notes.

Mr. Rottenborn: Okay. All right. And you kept the notes in the normal course of business?

Dr. Kipper: Yes.

Mr. Rottenborn: And, again, the notes are meant to be accurate.

Dr. Kipper: Yes.

Mr. Rottenborn: Oh. I'm sorry. Let's go back up. So there's 6/13/14, that is your notes?

Dr. Kipper: Correct.

Mr. Rottenborn: Okay. And it says, "Met with patient in his apartment, patient continues to be pleasant and cooperative. He stated that he initially started taking opiates after some dental work and became dependent on them." Do you recall that conversation with Mr. Depp?

Dr. Kipper: Yes, those are my notes.

Mr. Rottenborn: Okay. And it's also accurate that patient is fearful of coming off of opiates but knows what he needs to do?

Dr. Kipper: Yes, that reflects the conversation I had.

Mr. Rottenborn: Okay, and patient also expressed some emotional trauma which causes him depression and anxiety?

Dr. Kipper: Also true.

Mr. Rottenborn: And if we go to Kipper 54 of Kipper exhibit 5, these are the medications that Mr. Depp's assistant gave to you?

Dr. Kipper: Correct.

Mr. Rottenborn: And going down, it's accurate where it states that, "Patient states he currently takes oxycodone 50 mg BID and oxycodone 30 mg at bedtime?"

Dr. Kipper: Yes, that's correct.

Mr. Rottenborn: All right. Let's scroll down a bit here, and we're gonna go to Kipper 60 on Kipper exhibit 5, the notes for 6/22/14. This is, again, a note that you prepared? Is this a note that you prepared, Dr. Kipper?

Dr. Kipper: I'm reviewing this.

Mr. Rottenborn: Okay. Sorry.

Dr. Kipper: Yes.

Mr. Rottenborn: Okay. And you see where it says in the middle, "Patient spoke about his difficult childhood and current mood swings."

Dr. Kipper: Yes.

Mr. Rottenborn: What did Mr. Depp tell you about his mood swings?

Dr. Kipper: That he had evanescent changes in his mood from good to bad.

Mr. Rottenborn: And did he give any more information about what a bad mood would be?

Dr. Kipper: No, it was implied that would be depression, sadness.

Mr. Rottenborn: How about anger?

Dr. Kipper: That was not...I don't remember him saying that.

Mr. Rottenborn: And this note also said that he'd been depressed for the past three days? Right above where we just left.

Dr. Kipper: Yes.

Mr. Rottenborn: And Alex, keep this up but put up Kipper exhibit 6, please.

Mr. Rottenborn: Your Honor, we would move into evidence Depp exhibit 42.

Judge: 42. Any objection to 42?

Mr. Rottenborn: And this is another redacted document, counsel.

Judge: So mine's not redacted yet, correct?

Man: I don't see any redaction.

Mr. Rottenborn: We have a redacted copy, which we can provide. Also, I believe this is unobjected to on our exhibit list.

Judge: So pending redaction? All right.

Man: Well, the copy we had didn't have redactions. So I'm not sure...Non-redacted, I'm happy to have it included but I would need to see the redactions.

Judge: Well, I'll reserve on redactions then as we did with 40. Okay, so 42 with redaction...

Mr. Rottenborn: Understood, Your Honor.

Judge: ...decisions. Okay.

Mr. Rottenborn: And Dr. Kipper, do you recognize Kipper exhibit 6?

Dr. Kipper: Yes.

Mr. Rottenborn: And what is it?

Dr. Kipper: It's a summary of the treatment and encounter with Mr. Depp from June 22nd to June 24th, 2014.

Mr. Rottenborn: And you keep these notes in the normal course of business, correct?

Dr. Kipper: Yes.

Mr. Rottenborn: And, again, they're meant to be accurate, correct?

Dr. Kipper: Yes.

Mr. Rottenborn: Okay. And these notes reflect that you saw Mr. Depp in Boston again?

Dr. Kipper: Correct.

Mr. Rottenborn: Okay. And in the second paragraph, you write, "We discussed the need for compliance with his medications. We also discussed nicotine habit and agreed we would address this when we completed the opiate and benzo detoxification. Mr. Depp's filming will be completed around mid-July and we discussed the plan detoxification. Mr. Depp prefers to do this in his home in the Caribbean Islands. The anticipated duration is between 10 to 14 days and he will be completely isolated without any professional or personal obligations." Does this reflect the discussion you had with Mr. Depp?

Dr. Kipper: Yes, it does.

Mr. Rottenborn: And you also discussed that "Mr. Depp understands that a nurse, Debbie Lloyd, will assist me with this program and I will initiate this withdrawal and supervise daily visiting him at the end of his treatment to design the next steps in his therapy. And this protracted therapy will include a 12-step private counseling and personal psychotherapy and couples therapy with his fiancée, Amber. Both are in

agreement to this plan." Does that reflect the conversation you had with Mr. Depp?

Dr. Kipper: Yes.

Mr. Rottenborn: And was Ms. Heard at this conversation as well?

Dr. Kipper: I don't remember. But the last sentence implies that both were in agreement. So it's very possible that she was but I honestly can't remember.

Mr. Rottenborn: And during this detoxification, who was gonna be with Mr. Depp at his home in the Caribbean Islands?

Dr. Kipper: His fiancée, Amber, and the nurse, Debbie Lloyd, and whatever staff members he had.

Mr. Rottenborn: Where was Ms. Lloyd gonna be each day in the Caribbean Islands?

Dr. Kipper: She was going to be on his property in a separate area.

Mr. Rottenborn: And who was administering the medications to Mr. Depp?

Dr. Kipper: Ms. Lloyd was giving these medications and supervising that and there were periods of time at night, during the evening, early morning that Ms. Heard was also helping with this.

Mr. Rottenborn: And would there be times where Ms. Heard was administering the medications to Mr. Depp without Ms. Lloyd being present?

Dr. Kipper: Correct. Under supervision, but without being present.

Mr. Rottenborn: And when you say under supervision, what do you mean by that?

Dr. Kipper: That Ms. Lloyd would give Ms. Heard the direction on how to provide these medications.

Mr. Rottenborn: But wasn't necessarily going to be physically present there when the medications were delivered to Mr. Depp, correct?

Dr. Kipper: Correct.

Mr. Rottenborn: And Mr. Depp admitted to you that there may be traces of cocaine since he'd been using this substance prior to the initiation of

this program, correct? Is this note correct what you write here in Kipper 6 that "Mr. Depp admitted there may be traces of cocaine?"

Dr. Kipper: Yes.

Mr. Rottenborn: Okay. Let's just go back to exhibit 5. And if we go to either this...Do you see the note of 6/24/14 at 1200?

Dr. Kipper: Yes.

Mr. Rottenborn: Is 1200 the time?

Dr. Kipper: Yes.

Mr. Rottenborn: And it says...Are these your notes again?

Dr. Kipper: These are my notes.

Mr. Rottenborn: Dr. Kipper, these 18 pages came from your production. And I'll represent to you that there were no drug tests that I saw for 2014 or 2015 for Mr. Depp. Do you know why that is?

Dr. Kipper: The answer is no. I don't understand that. We had a flood in our office in 2014, October. The office above us flooded our office and the basement, which is where we kept certain records. But I'm not sure which records relating to Mr. Depp would have been involved in that, but other than that, no.

Mr. Rottenborn: Would drug tests for Mr. Debt for 2014 and 2015, would those also be kept electronically?

Dr. Kipper: No.

Mr. Rottenborn: Who did you work with to conduct the drug tests of Mr. Depp?

Dr. Kipper: Yes, I ordered the drug tests.

Mr. Rottenborn: And what company did you work with?

Dr. Kipper: It appears that it's MD Lab. That's the lab we use.

Mr. Rottenborn: And the drug tests that we do have, they came from your files, correct?

Dr. Kipper: Correct.

Mr. Rottenborn: And they're meant to be accurate, correct?

Dr. Kipper: Correct.

Mr. Rottenborn: And you would agree that drug tests that you took of Mr. Depp in the 2016 through 2019 period showed Mr. Depp testing positive for cocaine, correct?

Dr. Kipper: Correct.

Mr. Rottenborn: Drug tests showed Mr. Depp being positive for cocaine, correct?

Dr. Kipper: Yes, correct.

Mr. Rottenborn: Okay. And for THC, Mr. Depp was also positive for THC, correct?

Dr. Kipper: Correct.

Mr. Rottenborn: And for benzo, is that correct?

Dr. Kipper: The answer would be yes. I'm looking for benzo...The answer would be correct because he was maintained on benzos, benzodiazapines.

Mr. Rottenborn: And how long was Mr. Depp on benzodiazepines?

Dr. Kipper: He was on benzodiazepines pretty much throughout our relationship during this period of time.

Mr. Rottenborn: Wasn't one of the objectives to get him off of benzodiazepine?

Dr. Kipper: It was, and we actually used a medication to accomplish that, initially. But he didn't tolerate that medication very well. Not everyone does. So he was put back on his benzos.

Mr. Rottenborn: On page 3 of exhibit 7, what's being shown here under where it starts with cocaine metabolites?

Dr. Kipper: This is a listing of substances with reference ranges. And I think if you scroll down, you'll see his specific analysis related to that.

Mr. Rottenborn: And on page 4, Robert Wells was the name for Mr. Depp? Is that correct?

Dr. Kipper: Yes, correct.

Mr. Rottenborn: And this is a drug test for 11/21/16, correct?

Dr. Kipper: Yes.

Mr. Rottenborn: And what is it showing Mr. Depp positive for, what drug?

Dr. Kipper: Positive for cocaine, amphetamines, and benzodiazepines.

Mr. Rottenborn: And on page 5, this is a drug test for November 21st, 2016, correct?

Dr. Kipper: Correct.

Mr. Rottenborn: And what drugs is it showing Mr. Depp was positive for?

Dr. Kipper: It shows cocaine, benzodiazepines, cannabinoids, and amphetamines.

[03:49:10]

[silence]

[03:49:26]

Mr. Rottenborn: And, again, drug tests were taken of Mr. Depp in 2014 and 2015, correct?

Dr. Kipper: Correct.

Mr. Rottenborn: Now, you had mentioned before, and the note said that the plan was for Mr. Depp to detox on his island in the Bahamas. Is that right?

Dr. Kipper: Correct.

Mr. Rottenborn: Okay. Okay. And were you going to be going to the island at any point? Were you planning to?

Dr. Kipper: Yes.

Mr. Rottenborn: Okay. Was it gonna be throughout Mr. Depp's entire detoxification or when were you planning on being at the island?

Dr. Kipper: I was planning to see him and did see him towards the beginning as we initiated treatment, and towards the end when we were transitioning from that treatment into the next phase of his treatment.

Mr. Rottenborn: Now, on 8/14, it says, "Arrived on island today, plan is for patients to continue to take routine meds through tomorrow at HS. At that time, he will not take his oxycodone and detox medications will be initiated." Do you see that?

Dr. Kipper: Yes.

Mr. Rottenborn: Okay. Is that you arriving at the island or Ms. Lloyd arriving at the island?

Dr. Kipper: That's Ms. Lloyd.

Mr. Rottenborn: So that 8/14 note is her note, correct?

Dr. Kipper: Correct.

Mr. Rottenborn: So some of these notes are hers and some of these notes are yours?

Dr. Kipper: These notes going forward are her notes, appear to be her notes.

Mr. Rottenborn: Okay. What type of system were you putting these notes into?

Dr. Kipper: I don't understand your question.

Mr. Rottenborn: The notes just appear to be continuous and you said some are your notes and some are her notes. I'm concerned how they got put together.

Dr. Kipper: Because I've put all of these treatment notes together [inaudible 03:51:38].

Mr. Rottenborn: Okay. Would Ms. Lloyd type these notes or were they handwritten?

Dr. Kipper: She would type these notes.

Mr. Rottenborn: Okay. And then who put them all together?

Dr. Kipper: I did.

Mr. Rottenborn: Okay. Here's the 8/9/14, "Patient expressed fears of never feeling normal without his drugs." See that?

Dr. Kipper: I see that.

Mr. Rottenborn: Did Mr. Depp ever express that to you?

Dr. Kipper: Yes, in some form, he discussed that with me.

[03:52:15]

[silence]

[03:52:45]

Mr. Rottenborn: Hold on one second. Sorry. Do you see Kipper 71 where it says, "MD's flight has been canceled, arrangements are being made for him to arrive on the island on 8/12/14?"

Dr. Kipper: Yes, I see that.

Mr. Rottenborn: Okay. So is it accurate that you arrived at Mr. Depp's island on August 12th, 2014? Is that accurate?

Dr. Kipper: Yes, that's accurate.

Mr. Rottenborn: Did you go to assess Mr. Depp on August 15th, 2014 according to these notes?

Dr. Kipper: That's correct.

Mr. Rottenborn: And by the way, fiance is Ms. Heard in these notes, correct?

Dr. Kipper: Yes.

Mr. Rottenborn: And patient is Mr. Depp, correct?

Dr. Kipper: Correct.

Mr. Rottenborn: And this is at Kipper 77 on Kipper 5, "Text from fiance, the patient is upset and irritable. MD and RN went to assess the patient." Is that accurate that you came to see Mr. Depp at 1:00 in the morning?

Dr. Kipper: Yes.

Mr. Rottenborn: And after receiving a text from Ms. Heard?

Dr. Kipper: Correct.

Mr. Rottenborn: And Mr. Depp...The note says, "He," being Mr. Depp, "states he had a fight with fiance and his questioning whether or not he can emotionally and physically handle detox." Do you recall this conversation?

Dr. Kipper: I can't remember that conversation. But I do know that he was struggling at that point.

Mr. Rottenborn: And how was he struggling?

Dr. Kipper: And he was frustrated. He was uncomfortable physically.

Mr. Rottenborn: Dr. Kipper, this is an email...Do you recognize this document?

Dr. Kipper: I do.

Mr. Rottenborn: And what is Kipper 8?

Dr. Kipper: This is an email that I sent to his sister, Christi.

Mr. Rottenborn: Christi Dembrowski is Mr. Depp's sister?

Dr. Kipper: Correct.

Mr. Rottenborn: Okay. And you sent this email to Ms. Dembrowski on August 18th at 7:54 a.m., correct?

Dr. Kipper: Correct.

Mr. Rottenborn: This email was shortly after you had met with Mr. Depp in the note we just discussed, correct? 0754 Pacific, so it was sometime in the morning in the Bahamas, correct?

Dr. Kipper: I guess. I don't have that calculator in front of me.

Mr. Rottenborn: It's either three or four hours ahead. So it's either 10:54, maybe it's 11:54 in the morning.

Dr. Kipper: Correct. I guess that's right. I mean, I assume that's right.

Mr. Rottenborn: Okay. And why did you write this email to Ms. Dembrowski?

Dr. Kipper: We were planning to transition back to Los Angeles. We had completed the initial phase of his detoxification. And I wanted to update her as to my impressions on how he was doing and how we would proceed going forward.

Mr. Rottenborn: And you wrote this to Ms. Dembrowski because you were concerned about Mr. Depp, is that correct?

Dr. Kipper: I wrote this so that she was aware of where we were in the process of his treatment.

Mr. Rottenborn: And you wrote this after he had an incident with Ms. Heard, correct?

Dr. Kipper: I did not witness the incident. I wrote this after we were called to see him because there was an alleged incident. But he clearly was uncomfortable at that time when we came to see him. And, again, we were getting ready to transition off of the island. And I wanted Christi to have a clear understanding of where we were at that time.

Mr. Rottenborn: Can we pause? I was gonna move forward. And then at 12:30...

Man: Thank you, I was gonna move for the admission of defendant's exhibit 268.

Judge: 268.

Mr. Rottenborn: And, Your Honor, we're gonna have a substantial hearsay and speculation objection to this exhibit. This is a communication from Dr. Kipper to a third-party. It's hearsay from start to finish, and not within any exception to say nothing of the fact that it contains speculation.

Judge: Okay.

Mr. Rottenborn: I think there are certain hearsay in the first paragraph, and in the third, on the second page, but the rest of it is Dr. Kipper's impressions of Mr. Depp.

Man: It's not a court statement offered for the truth, Your Honor. It's hearsay.

Man: I'm gonna sustain as to hearsay, okay?

Man: Thank you, Your Honor.

Mr. Rottenborn: You and Ms. Lloyd met with Mr. Depp?

Dr. Kipper: Yes. According to these notes, yes.

Mr. Rottenborn: Okay. And do you know, is this now in the Bahamas, or was this back in Los Angeles?

Dr. Kipper: I need to go back to the date, not the time. Can you scroll up? Thank you.

Mr. Rottenborn: 8/20/14.

Dr. Kipper: And I'm just looking at my calendar. Yes, we were now back in Los Angeles.

Mr. Rottenborn: And in the notes for 12:30 on August 21st, "Mr. Depp stated he was done with the process and no longer wanted MD and RN services." Do you see that?

Dr. Kipper: Yes.

Mr. Rottenborn: Do you recall Mr. Depp telling you that?

Dr. Kipper: Yes.

Mr. Rottenborn: And do you recall Mr. Depp saying that there was tension between him and Ms. Heard?

Dr. Kipper: Yes.

Mr. Rottenborn: Was the plan for Ms. Heard to take a few days for herself?

Dr. Kipper: Yes.

Mr. Rottenborn: Is it true that Mr. Depp wanted to stop taking all the medications you were providing him?

Dr. Kipper: Yes, that's reflected in this note.

Mr. Rottenborn: Now, you mentioned you did text with Mr. Depp on occasion, correct?

Dr. Kipper: I believe so but I really can't remember any specific time or message that I sent to him.

Man: Dr. Kipper, Mr. Depp has produced a number of texts in this litigation between you and him. And they're in this chart here. And we're not gonna go through all of them, I promise you. But I just I wanna ask you about a few of them. And we'll do this kind of throughout the deposition.

[03:59:46]

[silence]

[04:00:13]

And on 8/21/2014, it says Dr. David Kipper, this 310 phone number, was that your phone number at the time?

Dr. Kipper: Yes.

Man: Okay. And this is a text from you to Mr. Depp, it says, "Glad you're better today. Respect you as much as I love you. You're impossible not to love but an easier job not to respect. You're making my job a pleasure and honor and a few sleepless nights. Stop firing me. I know what I'm doing." Do you recall sending that text to Mr. Depp?

Dr. Kipper: Yes.

Man: Okay. How long have you been working with Mr. Depp at this point as of August 21st, 2014?

Dr. Kipper: And can you define by working with him? Are you talking about specifically the detox or are you talking about our initial meeting?

Mr. Rottenborn: Well, even if you go with the initial meeting, how many months? Your Honor, as I mentioned in the deposition, defendant's exhibit 1063 is a long list of text messages between Dr. Kipper and Mr. Depp, a number of which are gonna be testified to today, or Monday. And I would just ask that the ones that they testify to, we would provide in a redacted form, which would just be just the text that they're testifying to, and it would be for a number throughout, I can get up each time, but I was hoping I wouldn't have to do that.

Man: Your Honor, I think we're gonna have to maintain a hearsay objection. It's a text-by-text issue whether it falls within any exception. So, we're not gonna be able to agree that the entire document comes in, it's possible that some may come in. But I think that's something that needs to be worked out between counsel afterwards.

Judge: So we can reserve it...He's still gonna testify too because we've...

Man: Understood, Your Honor, the testimony can come in but that doesn't mean the document itself is admissible.

Judge: I can reserve on 1063 and we can figure out the redactions, okay?

Man: Thank you, Your Honor.

Dr. Kipper: About four months.

Mr. Rottenborn: Okay, and you write, "Stop firing me." In that for months, how many times did Mr. Depp try to fire you?

Dr. Kipper: I believe that was the first time. And, again, this was in reference to him not wanting to proceed and not wanting our help. This is actually...I'm sorry, this is the second time because the first time was on the island just as we were getting ready to leave and he did not wanna proceed. He didn't think he could do it. That changed after a conversation, he was back on board. And this came from...I think followed that incident that you just referred to in the notes where we were asked to come and visit with them, and where he didn't wanna proceed, and again at the end of that visit, he was back on board.

Mr. Rottenborn: Okay, now on August 24th, 2014 shows a text, [inaudible 04:03:56] him, that's Mr. Depp to you, David Kipper, and Mr. Depp wrote, "Forgot to tell you, had a hopefully very positive and free of ego squawk with Amber last night that went very well...And then I shot a few [inaudible 04:04:14] in a club on Sunset Boulevard. So far so good..." Do you recall this text from Mr. Depp?

Dr. Kipper: No.

Mr. Rottenborn: Okay. Was that Mr. Depp's typical language?

Dr. Kipper: Again, I don't recall this specific email. So, that may have been an attempt at humor.

Mr. Rottenborn: Dr. Kipper, Kipper 10 is...Do you recognize this document?

Dr. Kipper: No, but I'm looking at it.

[04:04:55]

[silence]

[04:05:20]

Mr. Rottenborn: Let me ask you this, do you recall if hoursark@icloud.com is Ms. Heard's email address?

Dr. Kipper: I assume that by looking at this document.

Mr. Rottenborn: Exhibit 5, Kipper 101 at 9/22/14 at 1:25, you see it says, "Received text from patients stating that he had been in an argument with fiancée and she had a 'nasty freakout' and would like nurse to give him 'some fucking knockout yum yum.' RN instructed patient to take Neurontin 300 mg PRN and Seroquel 50mg, and that RN was on her way." Do you see that?

Dr. Kipper: Yes.

Mr. Rottenborn: And this is a note from Ms. Lloyd?

Dr. Kipper: Correct.

Mr. Rottenborn: Okay. And then it says, "At 3:30, upon arriving at the home, patient was sitting in kitchen with scraped and bloody knuckles on R hand," meaning his right hand, correct?

Dr. Kipper: Correct.

Mr. Rottenborn: "Patient stated he punched whiteboard in kitchen after fight. Patient stated he'd been texting his friend explaining why he didn't show up to play music and fiance got upset, he was not giving her enough support, and the fight escalated from there. Called the MD at 1:45 and instructed to give a stat order of Ambien 10 mg to help patient get to sleep as he has an early workday." Do you recall Ms. Lloyd telling you about or visiting Mr. Depp and him having bloody knuckles and a scraped hand?

Dr. Kipper: Specifics...I'm really in the note your reading and, yes, I remember there was an incident.

Mr. Rottenborn: An incident where Mr. Depp's hand had scraped and bloody knuckles on his hand?

Dr. Kipper: As indicated in the note, yes. I did not see bloody knuckles. I did not see a punch board. This was a communication that I received through the notes from Ms. Lloyd.

Mr. Rottenborn: And it does say you recall, do you recall if you had a conversation with Ms. Lloyd about...?

Dr. Kipper: Yes, I recall having spoken about there had been an incident. I don't recall the specifics of that conversation.

Mr. Rottenborn: Okay. On Kipper 5 at and the date of 10/14, show you there, which is on Kipper 110 of Kipper 5, and then going down to 1930, it says, "Patient finished filming and was extremely agitated leaving the set. Patient kicked in the door of his trailer and refused to speak to director. Patient was verbally aggressive to another person on the set for no apparent reason. Per MD, patient is to take Xanax 2 milligrams to reduce his agitation at this time." Do you recall that, Dr. Kipper?

Dr. Kipper: I do remember this entry. Yes.

Mr. Rottenborn: Do you remember being told that Mr. Depp kicked in the door of his trailer and refused to speak to his director, correct?

Dr. Kipper: I don't remember the specifics but I do remember there was some disagreement between Mr. Depp and the director.

Mr. Rottenborn: And where it says, "Per MD, patient is to take Xanax 2 milligrams to reduce his agitation at this time," is that an increase of Xanax that he was to receive?"

Dr. Kipper: Yes.

Mr. Rottenborn: And you see at 10/15 at 6:45, it says, "Patient awake and ate, he slept from 2200 to 4:30, patient continues to be agitated about work and is verbalizing having desires to escape with drugs." Do you recall seeing this note?

Dr. Kipper: I...Yes.

Mr. Rottenborn: And do you recall Ms. Lloyd telling you this about Mr. Depp?

Dr. Kipper: I don't remember if she told me that he wanted to use but I do remember her telling me that he was upset.

Mr. Rottenborn: And is that reflected in the note of 8:45, "MD informed of patient's state of mind and continued agitated, he's on his way to assess patient?" Is this part accurate?

Dr. Kipper: Can you show me that note?

Mr. Rottenborn: Right under...it's right here, 8:45.

Dr. Kipper: Oh, okay.

Mr. Rottenborn: The note's accurate that "MD informed of patient's state of mind and continued agitated, he's on his way to assess patient."

Dr. Kipper: Yes.

Mr. Rottenborn: And then at 12:30, it says, "Patient had fallen asleep and is now awake talking with MD. It has been decided patient is under too much stress as it would be best for him to stay home and rest today." Do you see that?

Dr. Kipper: Yes.

Mr. Rottenborn: Do you recall having a conversation with Mr. Depp about his stress?

Dr. Kipper: Yes, I do.

Mr. Rottenborn: Do you recall anything that Mr. Depp told you?

Dr. Kipper: I remember he was very upset. I don't remember the specifics of that conversation but I remember he was upset.

Mr. Rottenborn: And how was Mr. Depp displaying that he was very upset?

Dr. Kipper: He expressed himself very well that he and the director had some misunderstanding and that he was upset about it.

Mr. Rottenborn: Was Mr. Depp yelling?

Dr. Kipper: No.

Mr. Rottenborn: Was he doing anything to display his being upset other than his words?

Dr. Kipper: Just his words.

Mr. Rottenborn: You don't doubt the accuracy of this note though, do you?

Dr. Kipper: I can say that the note was written, and I believe it was good reporting. I trusted my nurses that they would report what they were told. Not for the opiates.

Mr. Rottenborn: Not for the opiates, is that what you said?

Dr. Kipper: Correct.

Man: Positive for cocaine, for instance?

Dr. Kipper: Yes.

Man: Now, on November 17th, 2014, Mr. Depp texted you and said, "I have been to see Amber downtown, yeah, yeah interesting to say the least. Wow. Anyway, I'm still awake and don't foresee slumber arriving anytime soon to this broken instrument of a squash situated atop my shoulders. I would love to speak whenever you get a minute, dear David, though honestly if I were you, Debbie and/or Erin, I would RUN FOR THE FUCKING HILLS!!! I love you, Doc...I cannot thank you enough for all you've done not only for me and my poor pack of wolves and my sweet FUCKING GRAVE MIKEY...these are the things that remind us that life should be a fucking gas. I'm waist-deep in big muddy here...Hit me when you're drunk...It'll be far less boring. Love you long time, brother...And, of course, the beautiful and luminous Chanel...And by now, 8-foot-6 Sam!! Mucho, mucho...From those of us who are not as others, X, JD." Do you recall this text from Mr. Depp?

Dr. Kipper: No, I don't but clearly I see that I received that text.

Mr. Rottenborn: Okay. Alex, can you put up Kipper 13, please?

[04:13:26]

[silence]

[04:13:50]

Do you recognize, Dr. Kipper, this email chain between you and Colin Cowan [SP]?

Dr. Kipper: I don't remember it but I'm refreshing myself with what you're showing me.

Mr. Rottenborn: Who is Colin Cowan?

Dr. Kipper: He's a psychologist that I had referred Amber to see.

Mr. Rottenborn: Dr. Kipper, are there any ethical rules to report reports of violence if you were to be told of violence?

Dr. Kipper: If I were to see the violence, I would be obligated to make some reporting. I never saw any violence.

Mr. Rottenborn: And you didn't report either Mr. Depp or Ms. Heard, correct? Because you didn't see...Your testimony is you didn't see any violence between Mr..[inaudible 04:14:58], correct?

Dr. Kipper: I never saw violence between the two of them.

Mr. Rottenborn: Okay. You heard reports but you never saw it is your testimony.

Dr. Kipper: Correct.

Mr. Rottenborn: Dr. Kipper, do you recognize Kipper 14, which it looks like as an email between you and Alan Blaustein [SP]?

Dr. Kipper: Yes, I recognize this.

Mr. Rottenborn: Okay. And who is Alan Blaustein?

Dr. Kipper: Alan Blaustein is the psychiatrist that I referred Mr. Depp to.

Mr. Rottenborn: And when you wrote this email as of March 1st, 2015, was it your understanding that Mr. Depp was in Australia at the time?

Dr. Kipper: Yes.

Mr. Rottenborn: At some point, you flew to Australia, is that correct, in this March 2015 timeframe?

Dr. Kipper: Yes.

Mr. Rottenborn: Were you always planning to fly to Australia to visit with Mr. Depp in March of 2015?

Dr. Kipper: No, I hadn't planned on it.

Mr. Rottenborn: What made you fly to Australia?

Dr. Kipper: He had wanted to see me. He had just wanted to check in. He wanted my company at that point.

Mr. Rottenborn: He being Johnny Depp?

Dr. Kipper: Yes.

Mr. Rottenborn: Do you know when you arrived in Australia?

Dr. Kipper: No, I don't. I can't recall.

Mr. Rottenborn: Ms. Lloyd had gone with Mr. Depp to Australia?

Dr. Kipper: Yes.

Mr. Rottenborn: She wasn't staying with Mr. Depp, correct?

Dr. Kipper: No, she was not.

Mr. Rottenborn: Do you know how far away Ms. Lloyd was from Mr. Depp in terms of time to get from where she was staying to Mr. Depp's house?

Dr. Kipper: I would guesstimate somewhere between 20 minutes to 30 minutes.

Mr. Rottenborn: And when you went to Australia, how far away were you from Mr. Depp in terms of time?

Dr. Kipper: Exactly the same.

Mr. Rottenborn: Were you and Ms. Lloyd in the same hotel?

Dr. Kipper: Yes.

[04:17:21]

[silence]

[04:17:36]

Actually, that isn't true. I was in a hotel around the corner from where the nurses were staying.

Mr. Rottenborn: And in Kipper 5 at Kipper 157, you see this note for 3/7/15 at 11:30, it says, "MD received a text message from clients that he had been arguing with wife and that he had cut his finger. According

to patient, his assistant and security were on their way to pick him up."
Do you see that?

Dr. Kipper: Yes.

Mr. Rottenborn: And who's note is this?

Dr. Kipper: That would be from Ms. Lloyd.

Mr. Rottenborn: Okay. And is this note accurate?

Dr. Kipper: Yes, it's accurate.

Mr. Rottenborn: Okay. Now, going back to Kipper 9...Give me a moment.

[04:18:28]

[silence]

[04:18:43]

At Kipper 7...at Depp 7790 there shows a text from Mr. Depp to you on March 7th, 2015 at 5 p.m. And it says, "Hi. Fuck, man, had another one. I cannot live like this. She is as full of shit as a Christmas goose. I'm done. NO MORE!!! The constant insults, the demeaning, belittling, most heartbreaking smew [SP] that is only released from a malicious evil and vindictive cunt!!!!!! But you know what?? FAR MORE HURTFUL than her venomous and degrading endless 'educatinal ranting...???' is her hideously and purposefully hurtful tirades and her goddamn shocking treatment of the man she was meant to love above all...Here's the real deal, mate...Her obsession with herself?? is far more important...She is SO FUCKING AMBITIOUS!!! She's so desperate for success and fame...That's probably why it was acquired, mate...!! Although she has HAMMERED ME with what a sad, old man, has-been I am...Cowan has done me the most cruel of favors...I'm so very sad...I cut the top of my middle finger off...What should I do!?? Except, of course, go to a hospital...I'm so embarrassed for jumping into anything with her...FUCK THE WORLD!!! JD." Do you recall this text from Mr. Depp?

Dr. Kipper: I don't recall the text but I do recall him reaching out after this incident.

Mr. Rottenborn: Is this text a typical type of text you would receive?

Dr. Kipper: In retrospect and in reading this, no, I think it reflected the fact that he was injured.

Mr. Rottenborn: Right. And Mr. Depp told you in the text, "I cut the top of my middle finger off," correct?

Dr. Kipper: That's what it says.

Mr. Rottenborn: And then you responded, "Call me." Do you see that? That's the next text.

Dr. Kipper: Yes. Yes.

Mr. Rottenborn: And did Mr. Depp call you?

Dr. Kipper: I can't recall if he called me but I know that I went to the residence.

Mr. Rottenborn: Okay. And did you go with Ms. Lloyd?

Dr. Kipper: Yes.

Mr. Rottenborn: Okay. And back to Kipper 5 at 1300, it says on March 7th, 2015, "Patient was having a hard time leaving the house, so security suggested the MD and RN go to house to see patient. Upon arrival, the house patient was sitting in car ready to leave. MD assessed patient's finger and will spend more time with patient at the location he's being moved to." So did you see Mr. Depp in the house?

Dr. Kipper: Yeah, I saw Mr. Depp outside the house in the car.

Mr. Rottenborn: Okay. So this note is accurate, correct?

Dr. Kipper: Yes.

Mr. Rottenborn: Was Mr. Depp intoxicated when you saw him? Was Mr. Depp coherent?

Dr. Kipper: Yes. Quite.

Mr. Rottenborn: He was quite coherent?

Dr. Kipper: Yes.

Mr. Rottenborn: What do you recall him saying to you?

Dr. Kipper: I don't recall the conversation specifically, but part of his finger was missing.

Mr. Rottenborn: Okay. But you said he was quite coherent. So it sounds like you have memories of what he was saying. What do you recall him saying?

Dr. Kipper: I don't recall what he said. I remember that he was very clear in speaking to me.

Mr. Rottenborn: Okay. Other than his finger, what did he look like?

Dr. Kipper: He looked like someone who just had had part of his finger taken off.

Mr. Rottenborn: What did the rest of his hands and arms look like?

Dr. Kipper: Nothing unusual.

Mr. Rottenborn: What did the house look like?

Dr. Kipper: The house was a mess.

Mr. Rottenborn: Anything you can describe about the house?

Dr. Kipper: There were things on the floor. There were things that had been thrown around it looked like. Just things were out of order in that house.

Mr. Rottenborn: What rooms did you see? What rooms did you look at in the house?

Dr. Kipper: I was in the kitchen. And I believe I went downstairs. I don't really remember. It was more of the same but things looked out of place.

Mr. Rottenborn: Did it look like there was a painting on the wall, someone had written things on the wall?

Dr. Kipper: No, it did look to me like there was blood on the wall. Not an actual painting.

Mr. Rottenborn: How long were you in the house for?

Dr. Kipper: Ten minutes, 15 minutes.

Mr. Rottenborn: And what were you doing in the house?

Dr. Kipper: I wanted to see what happened. I was trying to figure out what happened.

Mr. Rottenborn: Did you talk to Ms. Heard?

Dr. Kipper: I did.

Man: What did Ms. Heard say?

Dr. Kipper: Again, I can't recall specifics other than they had a fight. And specifics beyond that, I don't remember.

Mr. Rottenborn: Before seeing Mr. Depp that day, when had you seen Mr. Depp previously?

Dr. Kipper: I don't remember.

Mr. Rottenborn: Do you know if it was the day before?

Dr. Kipper: I can't remember.

Mr. Rottenborn: Do you remember if this was the first time you saw Mr. Depp since your arrival in Australia?

Dr. Kipper: Again, I can't remember.

Mr. Rottenborn: Dr. Kipper, I'm showing you what's been marked as Kipper 15. And my question is, do you recognize this email?

Dr. Kipper: Yes, I do.

Mr. Rottenborn: Okay. And you told Ms. Lisa Bean to "Please print for the chart." See that at the top?

Dr. Kipper: Yes.

Mr. Rottenborn: Okay. So that is being printed for Mr. Depp's chart? Is that correct?

Dr. Kipper: Correct.

Mr. Rottenborn: And Raja Sahani [SP] emailed you. Do you see that?

Dr. Kipper: Yes.

Mr. Rottenborn: And he writes, "Thank you for your time, David. Attached is a copy of my notes for you to use as necessary re: Robert Wells." And Robert Wells is Mr. Depp, correct?

Dr. Kipper: Correct.

Mr. Rottenborn: Right. And this was from March 8th, 2015, correct?

Dr. Kipper: Yeah.

Mr. Rottenborn: Is it accurate that his contaminated hands and fingers with dirt, grime, and...? I was gonna move for the admission of defendant's exhibit 370.

Judge: 3-7-0?

Mr. Rottenborn: 3-7-0. Yes.

Man: Just [inaudible 04:26:04], Your Honor.

Man: And, Your Honor, we would maintain our objections on grounds of hearsay. And the other objections asserted in our objections to the exhibits. This is an email communication between two non-parties to this case. It's hearsay. It's not within any exception, certainly not within the medical exemption, and it's not admissible.

Mr. Rottenborn: I think it is in the medical exemption because it's from one doctor to another doctor to treat Mr. Depp's hand.

Judge: I'll sustain the objection as hearsay.

Man: Thank you, Your Honor.

Dr. Kipper: That's accurate.

Mr. Rottenborn: Is there anything other than the coherent here that you find that's inaccurate?

Dr. Kipper: No, the rest of that seems accurate.

Mr. Rottenborn: Okay. And when you saw Ms. Heard at the house in this March 7th, 2015 timeframe, did she seem like she was on...? Was she coherent?

Dr. Kipper: She was coherent.

Mr. Rottenborn: Dr. Kipper, do you recall seeing Kipper 16 from the Gold Coast University Hospital?

Dr. Kipper: Yes, I do.

Mr. Rottenborn: And when do you recall seeing this note, at the time on March 8th, 2015, or around then?

Dr. Kipper: It was around then. This was the emergency room doctor that saw him. And then he gave him sort of temporary care. And then Mr. Depp was referred to the other doctor that we spoke of before this who was the hand surgeon.

Mr. Rottenborn: Did you talk to this doctor who wrote this note?

Dr. Kipper: Yes, I was present when Mr. Depp was being examined and treated.

Mr. Rottenborn: And at this point, as of March 14th, 2015, you were telling Mr. Depp that you weren't gonna be able to treat Mr. Depp anymore. Is that correct?

Dr. Kipper: The purpose of this note was to make sure that he was strictly compliant with everything because he needed to have his finger reconstructed. And I wanted to be sure that he was following our guidelines for the drug treatment.

Mr. Rottenborn: Mr. Depp was not following your protocol as of March 1st, 2015, correct?

Dr. Kipper: Yes, I had concerns.

Mr. Rottenborn: Mr. Depp was not following your protocols that you were giving them as of March 14th, 2015, correct?

Dr. Kipper: Correct.

Mr. Rottenborn: Dr. Kipper, do you recognize Kipper 17?

Dr. Kipper: Yes.

Mr. Rottenborn: So you were withdrawing your care for Mr. Depp, at least as of March 15th, 2015, correct?

Dr. Kipper: I was withdrawing my care if he did not comply.

Mr. Rottenborn: And as of March 15th, 2015, Mr. Depp was not complying, correct?

Dr. Kipper: Correct.

Mr. Rottenborn: Was Mr. Depp...?

Man: Can you pause again? I'm sorry. Thank you. Move for the admission of defendant's exhibit 391.

Judge: 391.

Man: And, Your Honor, we would maintain our objections on grounds of hearsay, relevance, and 403. It's hearsay not with any exception, it's a communication from a third party, not admissible.

Mr. Rottenborn: It's not hearsay. It's a letter from Dr. Kipper that doesn't have any hearsay in it. And it's...

Judge: Well, it's hearsay because it's a letter from him out of court.

Mr. Rottenborn: I mean, it's not offered for the truth of what happened. It's offered for, you know, what was occurring with Mr. Depp at the time of March 15th...

Man: By definition, Your Honor...

Judge: That's the truth of the matter.

Man: ...that's being offered for the truth.

Mr. Rottenborn: It's offered for notice of when Dr. Kipper was not continuous care of Mr. Depp.

Judge: I'll sustain the objection.

Man: Thanks.

Mr. Rottenborn: ...compliant as of March 14th?

Dr. Kipper: The answer is, yes, he was not compliant. And the problem at hand, no pun intended, was he was about to have surgery. And for him to have surgery on a finger, he needed to be strictly compliant with what his medications were, what his behavior was. And I did not think he was stable for surgery. And I could not clear him for surgery. And that was what provoked the letter.

Mr. Rottenborn: Right. And Mr. Depp had been breaking promises to remain sober, correct?

Dr. Kipper: Correct.

Mr. Rottenborn: And then did you ever stop your care of Mr. Depp?

Dr. Kipper: There was a week, I believe...and I'm fuzzy on the timeframe. But there was a short period of time after sending that note before he connected back with me asking me to take care of him and promising me compliance.

Mr. Rottenborn: Was Mr. Depp compliant with the program going forward after March 15th, 2015?

Dr. Kipper: He was compliant around his surgery and post-operative period.

Mr. Rottenborn: And then he became uncompliant again?

Dr. Kipper: I would have to refer to my notes, but I don't remember him being out of control. I remember him being, you know, compliant with what we needed him to do. There were times when Mr. Depp sort of

went underground. Some of that time was when he was out of the country and it was hard to connect to him. But I do not recall him going off the reservation as far as his drug and alcohol issues.

Mr. Rottenborn: Do you recall him tested positive for cocaine after March of 2015?

Dr. Kipper: I believe so. I can't tell you specifically when.

Mr. Rottenborn: Going back to Kipper 9, there's a text message from Mr. Depp to you on March 19th, 2015. And he says, "My most sincere apologies to you, Doc. I understand your decision based on my immunity to do the right thing. And I truly thank you for your concern. I must apologize for not having had the presence of mind to respect the man who has been the most kind and who has done more for me than anyone ever. There was no call for my spineless and base behavior toward you. I honestly understand the reasons for your concerns and your letter, and can say to you now, they're no longer an issue. Thank you for everything. I've chopped off my left finger as a reminder that I should never cut off my finger again. I love you, brother. Johnny." Do you recall this text from Mr. Depp?

Dr. Kipper: Yes.

Mr. Rottenborn: And is this the text do you recall where Mr. Depp was saying that he would be compliant going forward?

Dr. Kipper: Yes.

Mr. Rottenborn: Okay. You're basing it off of this text? Was there any other conversations with Mr. Depp?

Dr. Kipper: I know we had a conversation at some point around that time that validated this message.

Mr. Rottenborn: And going back to Kipper 5, which are again the notes, and we're gonna go to Kipper 167. And for 4/13 at 1500, the note at the bottom says, "Patient is in good spirits and said he's not smoked marijuana in three days, states he feels majority of his issues with his wife had been from him using drugs and alcohol. Patient states he'll no longer sneak/use and wants to enjoy clarity." Do you see that note?

Dr. Kipper: I see that note.

Mr. Rottenborn: And who is that note from? You or Ms. Lloyd?

Dr. Kipper: That's from Ms. Lloyd.

Mr. Rottenborn: Okay. Did Ms. Lloyd report this to you?

Dr. Kipper: In this note.

Mr. Rottenborn: Okay. And there's no reason to question the accuracy of the note, correct?

Dr. Kipper: Correct.

Mr. Rottenborn: Now, at Depp 168, 12:15, it says, "On April 15th, 12:15 arrived the patient's home, assistant was in hallway, informed RN the patient was in a bad mood and told assistant he did not need anything from him today. RN was let in home by security, knocked on patient's bedroom door to let him know she was there. Patient screamed, 'What?' RN informed patient she was just letting them know she was there and would be downstairs." A little more down, "RN left property and informed MD of the events." Do you recall Ms. Lloyd telling you about these events on April 15th, 2015?

Dr. Kipper: My memory is refreshed by looking at this note. Yes.

Mr. Rottenborn: And Mr. Depp yelled at Ms. Lloyd. Is that right?

Dr. Kipper: I'm not sure he yelled at Ms. Lloyd. I think he just yelled, wanting to be heard. I can't say, i wasn't there.

Mr. Rottenborn: There's a text from Mr. Depp to you on April 15th, 2015. And he says, "My dear brother, David, if there's a guy that I'm positive, it's you. Thank you, darling man. I'm fine. I didn't know it was Debbie until I'd already thrown my voice toward the door. I thought it was Stephen who is no small cauldron of hot water!! I'll call Debbie to apologize...My boundless love and infinite thanks." So you recall that he texted you called Ms. Lloyd to apologize?

Dr. Kipper: No, I don't recall that specifically. I'm reminded by this note, but I don't recall that specific.

Mr. Rottenborn: Now, Mr. Depp sent you a text on June 28th, 2015. It says, "Thank you my darling Kipper. All those technical abbreviations left me flummoxed and in the dark!!! Soon, soon I must see you and just hang out!!! My deformed finger and I have no friends!!! By the way...Amber and I have been absolutely perfect for three fucking months solid!!!! I've locked my monster child away in a cage within and it has fucking worked!!!! We're goddamn best friends now!!! Amazing!!! Big love to you, my brother...JD." You see that?

Dr. Kipper: Yes.

Mr. Rottenborn: And what do you recall you were...? What is refreshed of your memory?

Dr. Kipper: Obviously there was concern that he was taking more Xanax than he should have been. And I needed him to tighten that up and to go back to what he was prescribed. And also there's a reference here to the phone calls. I had asked him not to respond and not to engage in these phone calls because that always precipitated problems between the two of them when they were in a bad phase.

Mr. Rottenborn: Phone calls between Mr. Depp and Ms. Heard?

Dr. Kipper: Correct.

Mr. Rottenborn: All right, and Mr. Depp responds on July 1st, 2015, and says, "I am and have been at peace for the last three to four months. It's been amazing, but she's somehow locked into this very unpleasant and belittling mode in the last three days. The accusations, the verbal abuse, and insults stooping to one the most unjust, you haven't changed, you fucking desperate hypocrite. You didn't out the monster away. You're full of shit. You're a pathetic fraud. Man, you know how hard I have worked to put that motherfucker in his cage. And I did that, me. I took all those other problems and rid myself of them. There's a whole lot more. I won't bore you with it. The Xanax takes the edge off just a little. You know me, it would take more than a few to really affect me. Seroquel scares me for the reasons I wore off of it. If you're worried about the Xanax, prescribe me something different but with more potency. I don't take them all that often, just when the brain is inundated with this horrible badgering and half-truths from my wife by the way." I don't know if he meant by the way. Do you recall this text?

Dr. Kipper: Again, I do in looking at it. Yes.

Mr. Rottenborn: Okay. And Mr. Depp again used the term "monster," correct?

Dr. Kipper: Yes.

Mr. Rottenborn: And Mr. Depp goes on in this text, he says, "By the way..." He sends another, "Sorry, here's my...by the way, Cowan should be run out of town in utter shame. He's a fucking [inaudible 04:40:40] who has done absolutely nothing but given her the verbosity that she uses whenever she feels like she must explain to me the psychology of life!!! Ludicrous!!! Yes, sir. Cowan should be shot in places no one wants to be shot in!!! He's a goddamn charlatan, big time!!! I'm not gonna continue to pay the fucking yes-man to do nothing but stare at her tits

and agree with everything she spews...Tell him to tell he's leaving the business or something or I too will become a regular client, whether I am welcome or not!!! Thanks. And so sorry. I [inaudible 04:41:18] GU." Do you recall Mr. Depp informing you that he was upset with Dr. Cowan?

Dr. Kipper: Yeah. I remember clearly that he was upset with Dr. Cowan at a certain point.

Mr. Rottenborn: Do you recall this text message for Mr. Depp that I just read to you?

Dr. Kipper: Yes. In reading it, I do.

Mr. Rottenborn: Okay. All right.

Judge: Do you want to go and pause? Looks like a good time to break it. It's 5:00. Perfect. Thank you. Any objection to breaking there for the weekend? All right. All right, ladies and gentlemen, we'll pick up with this testimony on Monday. Since I'm not gonna see you for three days, I just wanna reiterate the same jury instruction I gave you in the beginning of the case when you were first impaneled, not all of it but some of it. I just wanna make sure you understand for the weekend that you're not to read anything about the case, you're not to watch anything about this case, you're not to listen to anything about the case. This applies to television, newspapers, magazines, the internet, and any online sites.

Further, you're not to read, watch, or listen to anything about the case on any social media networking sites, such as Twitter, Facebook, Instagram, Snapchat, or similar sites. In addition, you must not communicate with anyone about the case, whether in-person, over the phone, by email, text, or instant messaging, or by any other electronic or non-electronic means. This includes your friends, family, coworkers, acquaintance, and strangers. I also instruct you that you cannot do any research or make any inquiries about this case, whether online or by any other means. What you learn about this case is limited to what you learn in the four walls of this courtroom when proceedings are underway, all right? So have a good weekend. And we'll see you bright and early Monday. Okay? Thank you.

All right. And for the litigants, I'll see you back on Monday. Please no posting on social networking sites, and don't talk to the press, all right? And for the attorneys, I'll see you tomorrow at 10:00 a.m for a long day. And I'm sure you've been doing your homework, right? So, we should be able to get through a lot of deposition objections, right?

Together: That's right.

Judge: Perfect. All right. Thank you. All right. We'll see you tomorrow then. Thank you.

Man: All rise.