

TRANSCRIPT OF THE POOL TV FEED FROM DEPP v HEARD

FAIRFAX COUNTY COURT Monday 18 April 2022

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Man: ...[inaudible 00:00:01].

Judge Azcarate: All right. Good morning.

Woman: Good morning.

Man: Good morning.

Judge Azcarate: Are there any preliminary matters before the jury comes in?

Woman: [inaudible 00:00:11] we have a couple of [inaudible 00:00:12].

Judge: If you could put your microphone on, or go to the...

Woman: [inaudible 00:00:15]

Judge Azcarate: Oh, you wanna approach with it? Okay, that's fine. All right, anything else preliminary?

Mr. Nadelhaft: No thank you, Your Honor.

Judge Azcarate: Okay. We're good? We ready for the jury? All right. Let's bring the jury out.

Mr. Nadelhaft: [inaudible 00:00:28] Your Honor, [inaudible 00:00:29].

Judge Azcarate: Oh, sorry.

Mr. Nadelhaft: I'm sorry. So, Dr. Kipper is going to be...

Judge Azcarate: Oh, yes. Dr. Kipper is the last hour.

Nadelhaft: We've had agreements on exhibits for both him and Lloyd, and I didn't know if you wanted us to tell them to you now, because then they're gonna be played...we're agreeing that the ones we have agreements on should be shown [crosstalk 00:00:48].

Judge Azcarate: You wanna wait for the jury, and then you can enter those into evidence. Is that okay? You enter those exhibits into evidence when the jury comes out? Does that sound all right?

Mr. Nadelhaft: Yeah, that's fine with me.

Judge Azcarate: That works? Okay, that works. Okay. All right. Good morning, ladies and gentlemen. All right. Yes, Mr. Nadelhaft, did you have... Ladies and gentlemen, you might remember we're in the middle of Dr. Kipper's testimony, per deposition, but I think there's some exhibits that need to be moved in.

Mr. Nadelhaft: Thank you, Your Honor. The parties discussed over the weekend, and we have agreement as to plaintiff's exhibits 41, 42, 47, 48, and 49 of plaintiff's exhibits. I do believe that there are some slight redactions that I think they have copies of that they can provide to you. And then we also have defendant's 1063, which is redacted. And I can provide you a copy, and they also have the redactions. Same for defendant's 283, defendant's 405, defendant's 455, defendant's 304, defendant's 307, and in addition, 395 and 414 would come in without any redactions. But I can provide you copies of the ones that we [crosstalk 00:02:22].

Judge Azcarate: All right. And have you already done the redactions, or are you still working on redactions?

Woman: Your Honor, we have agreed on the redactions, except for one document, which we will address [crosstalk 00:02:32].

Judge Azcarate: Okay. And now, 42, I already have in evidence. I was just waiting for redactions for that one. So we're still waiting for redactions for that one, correct? Or do you have that for me?

Mr. Nadelhaft: So, 42 is, I believe, defendant's.

Judge Azcarate: Defendant's 42.

Mr. Nadelhaft: Oh, I think you decided there...we agreed for that one that there would be no redactions.

Judge Azcarate: Wait, plaintiff's 42?

Mr. Nadelhaft: Sorry, plaintiff's 42, we agreed...

Judge Azcarate: No redactions.

Mr. Nadelhaft: ...after discussion that there would be no redactions.

Judge Azcarate: Okay, gotcha.

Woman: That's correct.

Judge Azcarate: Okay. All right, so all those are entered into evidence, is that correct, with the redactions that you've agreed upon?

Mr. Nadelhaft: Yes, Your Honor.

Judge Azcarate: All right. So there's no objection?

Woman: Yes, there's no objection. [inaudible 00:03:07]. Did you address ours?

Mr. Nadelhaft: I think I addressed yours, but...

Judge Azcarate: All right.

Mr. Nadelhaft: And we can provide you... So, they have the electronic copies, which are gonna be shown while the deposition is being played, and we can provide the copies. I can provide you copies now of the redacted ones.

Judge Azcarate: If they're redacted ones, I need copies. If they're not redacted, I have them.

Mr. Nadelhaft: Right. [crosstalk 00:03:26].

Judge Azcarate: So yes. Okay?

Mr. Nadelhaft: Okay.

Judge Azcarate: That'll be fine, all right?

Mr. Nadelhaft: Thank you, Your Honor.

Judge Azcarate: Thank you. All right. All right, I think we're ready. Thank you.

Woman: If I may, just before we begin, Your Honor.

Judge Azcarate: Okay.

Woman: Just as an explanation for the jury, what you have seen from Dr. Kipper up until this point has been Ms. Heard's counsel examining him. At some point, it'll switch over, and it'll be Mr. Depp's counsel examining him.

Judge Azcarate: All right. Thank you.

Mr. Nadelhaft: ...Mr. Depp informing you that he was upset with Dr. Cowan.

Dr. Kipper: Yes, I remember clearly that he was upset with Dr. Cowan, at a certain point.

Mr. Nadelhaft: You know, do you recall this text message from Mr. Depp that I just read to you?

Dr. Kipper: Yes, in reading it, I do.

Mr. Nadelhaft: Okay. And then Mr. Depp wrote to you again on July 5th, 2015, and said, "You're a great man and a great friend. As much as I would love to see you...be a waste of your time...I've just got quite a lot going on with business stuff, my Keith film, and some Amber issues... By the way, I'll try not to be too subtle about this...Cowan should be stripped of his license to practice his supposed profession...and then he should be stripped and spray-painted whilst handcuffed to a stop sign!!! He is at best a fraudulent, irresponsible turd of monumental proportions!!! I love you, Johnny." Do you recall this text message from Mr. Depp?

Dr. Kipper: Again, I do, upon reading this. I don't remember all the specific messages I got from him, but I certainly remember the gestalt of his feelings.

Mr. Nadelhaft: Okay. And do you continue to work with Dr. Cowan? Do you continue to refer patients to Dr. Cowan? Let me ask it differently.

Dr. Kipper: Yes. I have great respect for Dr. Cowan.

Mr. Nadelhaft: And Mr. Depp sent you another text message on July 24th, 2015, that says, "Hey, dear pal, Amber is happy-happy with Cowan...I just don't know what truth he gets, and I don't know what his manners and strengths are...I think she listens to him, because when we argue, she slathers me up in the most condescending, psychiatric trophy lines like...'Your fear is so visible...what are you scared of?...!!! Why are you letting your fear and your ego control your life, etc.?'...hippy shit...makes me wanna rampage against ANYONE wearing Birkenstocks!!! Love you large, J." I assume you recall this text message as well?

Dr. Kipper: No, but I recall when I'm looking at it, yes.

Mr. Nadelhaft: Okay. Now I wanna go to another text message. On August 3rd, 2015, Mr. Depp texts you, "You can flog me soon for waiting until now, for having not to properly given my kind apparatus the appropriate and adequate general cock love...I've tried and mostly

failed...Many, many unpleasant things happening with my business world going on that are attempting to give me the funny pain-face that could render me no more and send me headfirst straight into the bowl of minestrone, or worse, a green curry...So most necessary [inaudible 00:07:25] are all headache meds, Xanax, Adderall, and whatever. This magical ointment for that traitorous redness in the much-valued end region of significance...Thanks and love, XJD." Do you recall this text message?

Dr. Kipper: No, but I'm once again reminded by looking at it.

Mr. Nadelhaft: Do you recall not being paid for three months?

Dr. Kipper: I recall not being paid. I don't remember how long. And it always turned back around, but specifically that issue, no, I can't give the specifics.

Mr. Nadelhaft: So there was a period of time where Mr. Depp was not paying you for your services, correct?

Dr. Kipper: Correct.

Mr. Nadelhaft: Okay. So as of February 10th, 2016, you were very concerned about Mr. Depp's health, correct?

Dr. Kipper: In the document, I'm also serving as his internist, managing some medical issues. And that's the nature of these concerns.

Mr. Nadelhaft: You weren't concerned at all about Mr. Depp's continuing with his treatment plan for drug and alcohol use?

Dr. Kipper: You can't separate those two issues. They're not two distinct issues. But in order for me to assess how he was doing in general, with his general health, these metrics that I identify in the second paragraph were things that I needed to have follow-up on. And I wasn't getting that follow-up, and I needed to know that we were on the right course, medically.

Mr. Nadelhaft: And do you recall being concerned about Mr. Depp in June 2018?

Dr. Kipper: Yes.

Mr. Nadelhaft: What, if any, concerns did you have about Mr. Depp taking drugs or alcohol that were not part of the protocol?

Dr. Kipper: I was concerned that that could be potentially an issue.

Mr. Nadelhaft: Dr. Kipper, Kipper 28.

Woman: Your Honor, at this point there's an exhibit at which the parties are still in dispute. I believe it's okay to continue playing at this point, and we can resolve it after the fact?

Dr. Azcarate: All right.

Mr. Nadelhaft: Yes, we can resolve it after the deposition.

Dr. Azcarate: All right, that's fine. Thank you.

Mr. Nadelhaft: [crosstalk 00:09:54]. Are invoices that you produced...from February 6th, 2015 to February 1st, 2021, do you recall producing these documents?

Dr. Kipper: No, no. Those would have come from my accountant's office.

Mr. Nadelhaft: Okay. Are you still working for Mr. Depp?

Dr. Kipper: Yes.

Mr. Nadelhaft: Okay. And so, at the bottom here, there's a lot that just say "Case manager and fee." Do you know what that refers to as opposed to nursing services and doctor services?

Dr. Kipper: That's a retainer fee that I have with him on a monthly basis.

Mr. Nadelhaft: Now, Dr. Kipper, we received invoices for you for Mr. Depp from Fireman's Insurance Fund for 2014. Does this look like an invoice from your office to Mr. Depp?

Dr. Kipper: No.

Mr. Nadelhaft: Dr. Kipper, you've already testified that these are invoices to Mr. Depp, correct?

Dr. Kipper: I've testified that these are invoices...this is something generated from my accountant, yes.

Mr. Nadelhaft: Have you spoken to Mr. Depp's legal counsel since the beginning of this year?

Dr. Kipper: Yes.

Mr. Nadelhaft: Who have you spoken to?

Dr. Kipper: I've spoken to Camille on two occasions.

Mr. Nadelhaft: Anybody else?

Dr. Kipper: No.

Mr. Nadelhaft: What did you speak to Camille about?

Dr. Kipper: About the deposition.

Man: Dr. Kipper, I think you're incorrect. I think, also, Ms. Meyers was in one of those telephone conversations.

Dr. Kipper: That's right.

Mr. Nadelhaft: And other than the scheduling of the deposition, did they talk about the issues that you were gonna be asked about?

Dr. Kipper: Yes, of course.

Mr. Nadelhaft: Okay. How long were the conversations?

Dr. Kipper: Forty-five minutes each.

Mr. Nadelhaft: Were they over phone, or by Zoom, or in person?

Dr. Kipper: The first conversation was in person, and the second was by Zoom.

Mr. Nadelhaft: Okay. And you had thought they were about two 45-minute calls?

Dr. Kipper: About that.

Mr. Nadelhaft: Okay. Are you paying for your counsel in this case?

Dr. Kipper: Yes, I am.

Ms. Meyers: First of all, Dr. Kipper, do you remember seeing this document earlier?

Dr. Kipper: Yes, I do.

Ms. Meyers: And you recognize it as your initial consultation notes with Mr. Depp?

Dr. Kipper: Yes.

Ms. Meyers: I'd like to direct your attention to the third page. Excuse me one moment. Okay. Do you see here where it says "impressions"?

Dr. Kipper: Yes.

Ms. Meyers: Now, could you describe what the items listed under this heading are?

Dr. Kipper: The first one, primary dopamine imbalance. This, in general terms, I don't [inaudible 00:13:29]. Primary dopamine imbalance, ADHD, which is attention deficit hyperactivity disorder, bipolar 1, depression secondary to above, insomnia, chronic substance abuse disorder, chronic reflux.

Ms. Meyers: With respect to these items, are these an official diagnosis of Mr. Depp?

Dr. Kipper: These are my impressions, yes.

Woman: [inaudible 00:14:00]

Ms. Meyers: When you say "impression," would you consider that a diagnosis?

Dr. Kipper: Yes, Ms. Meyers. That's my diagnostic impression.

Ms. Meyers: I'd like to pull up [inaudible 00:14:23] marked as Kipper Exhibit 4, please.

[00:14:27]

[silence]

[00:14:47]

Ms. Meyers: And Dr. Kipper, I believe we've already established, but could you confirm that you recognize this document?

Dr. Kipper: Yes.

Ms. Meyers: And these are also notes of the consultation you had with Mr. Depp?

Dr. Kipper: Correct.

Ms. Meyers: And it appears from these notes that Ms. Debbie Lloyd was at the meeting, correct?

Dr. Kipper: Yes.

Ms. Meyers: And she's a registered nurse?

Dr. Kipper: Yes.

Ms. Meyers: And did Mr. Depp's treatment plan contemplate Ms. Lloyd for meeting with Mr. Depp during his therapy?

Dr. Kipper: Yes.

Ms. Meyers: And was it contemplated that Ms. Lloyd would personally distribute his medications to him?

Dr. Kipper: [inaudible 00:15:44]

Ms. Meyers: Did Ms. Lloyd provide personally dispensed medications to Mr. Depp?

Dr. Kipper: Yes, she did.

Ms. Meyers: And how regular was Ms. Lloyd's contact with Mr. Depp?

Dr. Kipper: She had contact with him daily, either physically or by phone.

Ms. Meyers: How often would you estimate that she was physically in contact with him?

Dr. Kipper: I would say 80%, 90% of the time, somewhere in there.

Ms. Meyers: And Mr. Depp agreed to this supervision by Ms. Lloyd?

Dr. Kipper: Yes.

Ms. Meyers: Alex, could we please pull up what's been marked as Kipper Exhibit 6?

[00:16:37]

[silence]

[00:16:53]

Ms. Meyers: Dr. Kipper, could you please confirm that these are your notes from a consultation you had with Mr. Depp in Boston in June of 2014?

Dr. Kipper: Yes, this is a summary from June 22nd to June 24th of that time, I think.

Ms. Meyers: And if we scroll down [inaudible 00:17:17]. The notes reflect here that you met with Ms. Heard at that time, correct?

Dr. Kipper: Yes.

Ms. Meyers: [inaudible 00:17:29] Ms. Heard tell you that she was concerned about Mr. Depp being violent with her, at this consultation?

Dr. Kipper: No.

Ms. Meyers: If she had told you that, is that something you would have documented in these notes?

Dr. Kipper: Yes.

Ms. Meyers: Your note here states that Amber has a strong family history of drug and alcohol abuse and is particularly sensitive to his behaviors and potential for abuse. The phrase "potential for abuse," is that referring to substance abuse?

Dr. Kipper: Yes.

Ms. Meyers: It's not referring to physical abuse?

Dr. Kipper: No.

Ms. Meyers: And what do you mean when you state that Ms. Heard is particularly sensitive to Mr. Depp's behaviors?

Dr. Kipper: Having grown up in that environment, she's used to seeing the trauma that it inflicts, and is not only able to recognize it, but also, it affects her...she has the ability to understand what that looks like.

Ms. Meyers: And was this your observation of her, or something she told you?

Dr. Kipper: This is something she told me.

Ms. Meyers: And Alex, could you please pull up what's been marked as Kipper Exhibit 5, please? And Dr. Kipper, do you recognize these as...I believe you testified, a combination of your own patient notes and Ms. Lloyd's patient notes for Mr. Depp, correct?

Dr. Kipper: Yes.

Ms. Meyers: And I believe you testified you compiled them together. Is that right?

Dr. Kipper: Yes.

Ms. Meyers: For the notes that were taken by Ms. Lloyd, did you specifically request that she maintain these notes?

Dr. Kipper: Yes. That's part of her responsibility.

Ms. Meyers: And did you advise her on what types of information she should include in those notes?

Dr. Kipper: No.

Ms. Meyers: Is there anything in particular that you asked her to include in the notes?

Dr. Kipper: No. She was trained in this, and she knew what the important metrics were in notation.

Ms. Meyers: And I believe you testified that you have reviewed these notes in their entirety before, correct?

Dr. Kipper: Yes.

Ms. Meyers: How many times would you say you've reviewed these notes?

Dr. Kipper: I reviewed them at the time they were written, and I reviewed them probably a couple of weeks ago, so twice.

Ms. Meyers: And then turn to the last page now. And do you see this note marked June 30th?

Dr. Kipper: Yes.

Ms. Meyers: And so you do understand that to be June 30th, 2015?

Dr. Kipper: Yes.

Ms. Meyers: Did Ms. Lloyd stop attending to Mr. Depp around this time?

Dr. Kipper: I'm going to refer to my timetable, just because I'll have a better sense of where the treatment was.

Ms. Meyers: All right, I'd like to talk to you briefly about the detox process on Mr. Depp's island in August 2014. I believe you said that you traveled down to attend to Mr. Depp during this time, correct?

Dr. Kipper: Yes.

Ms. Meyers: And when you arrived on the island, who was present?

Dr. Kipper: Mr. Depp, Ms. Heard, Ms. Lloyd, and assistants for Mr. Depp. And I can't recall which assistants.

Ms. Meyers: Do you recall how many?

Dr. Kipper: No. There were people that I think lived or serviced that island when he was there. There were probably four of those people. And I'm not sure if he had one or two of his own assistants.

Ms. Meyers: Dr. Kipper, when you arrived on the island in August 2014, did you see where Mr. Depp was staying during that time?

Dr. Kipper: Yes.

Ms. Meyers: And what did these accommodations look like?

Dr. Kipper: He had a little home structure. It's a small structure, a bedroom and a kitchen and a sitting area.

Ms. Meyers: And was Ms. Heard staying there with him?

Dr. Kipper: Yes.

Ms. Meyers: And relative to where Mr. Depp was staying, where was Ms. Lloyd staying?

Dr. Kipper: She was staying on another part of the island, in a structure called a yurt, which is like a tent.

Ms. Meyers: And how long would it take Ms. Lloyd to get to where Mr. Depp was staying [inaudible 00:23:54]?

Dr. Kipper: Five Minutes.

Ms. Meyers: Five minutes?

Dr. Kipper: Five minutes.

Ms. Meyers: Would that be walking?

Dr. Kipper: No, that would be on a motorized vehicle.

Ms. Meyers: And relative to where Mr. Depp was staying, where did you stay when you were on the island?

Dr. Kipper: Stayed on the other side of that yurt.

Ms. Meyers: Okay, also in a yurt?

Dr. Kipper: Yes.

Ms. Meyers: Had Mr. Depp's detoxification process already started when you arrived on the island?

Dr. Kipper: Yes.

Ms. Meyers: And had Ms. Lloyd been overseeing that also?

Dr. Kipper: Yes.

Ms. Meyers: Did she report any issues to you upon your arrival?

Dr. Kipper: She certainly updated...I was updated. He started on the 10th, I arrived on the 12th, so I was in full communication with her from the beginning.

Ms. Meyers: After you arrived on the island, did you personally oversee Mr. Depp's detoxification process?

Dr. Kipper: Yes.

Ms. Meyers: And how often would you check in on him?

Dr. Kipper: Several times a day.

Ms. Meyers: And was this physically going to see him?

Dr. Kipper: No, this would be seeing him physically once a day and then checking on his progress throughout the day.

Ms. Meyers: So during the detoxification process, you did see Mr. Depp at least once a day?

Dr. Kipper: Yes.

Ms. Meyers: And was Ms. Lloyd checking on Mr. Depp daily?

Dr. Kipper: Yes.

Ms. Meyers: And she was seeing him in person daily as well?

Dr. Kipper: Yes.

Ms. Meyers: And you went and saw Mr. Depp after receiving that message, correct?

Dr. Kipper: Yes.

Ms. Meyers: And did Ms. Lloyd go with you?

Dr. Kipper: Yes.

Ms. Meyers: And where did you see Mr. Depp after receiving that message?

Dr. Kipper: I believe I saw him outside of his little home. Across from this little home was, like, a little cantina where one would eat, and it was, I think, around the cantina.

Ms. Meyers: And what was his physical condition at that time?

Dr. Kipper: He was frustrated. He was uncomfortable.

Ms. Meyers: How was his demeanor?

Dr. Kipper: One of being frustrated and uncomfortable.

Ms. Meyers: And was Ms. Heard with him at that time?

Dr. Kipper: When I saw Mr. Depp at that point, no, she was not.

Ms. Meyers: And at this time, this was in the middle of his detoxification process, correct?

Dr. Kipper: Yes.

Ms. Meyers: Did you see Ms. Heard that evening?

Dr. Kipper: I can't remember.

Ms. Meyers: Do you recall Ms. Heard seeking medical treatment from you for any physical injuries while you were on the island in August 2014? [inaudible 00:27:08]. Go ahead.

Dr. Kipper: No, I don't.

Ms. Meyers: If Ms. Heard has sought treatment from you for injuries, was that something you would have documented?

Dr. Kipper: Yes, I would have.

Ms. Meyers: Is that something you would have remembered her telling you?

Dr. Kipper: Yes.

Ms. Meyers: Did you see Ms. Heard after this evening of August 17th?

Dr. Kipper: On that particular evening, that I can't remember. But I did see Ms. Heard pretty much daily during my time on the island.

Ms. Meyers: So, did you see her at some point...perhaps, did you see her the next day?

Dr. Kipper: Yes.

Ms. Meyers: And did you observe any injuries to Ms. Heard at that time?

Dr. Kipper: No.

Ms. Meyers: She didn't have any bruises that you observed?

Dr. Kipper: No.

Ms. Meyers: After you met with Mr. Depp that evening of August 17th, did you go back to his accommodations at some point?

Dr. Kipper: No. No, I think we resolved the issues where we were, outside of his little hut, his home.

Ms. Meyers: So you didn't go and attend to him again in his home after that time?

Dr. Kipper: No.

Ms. Meyers: Alex, could you please pull up what's been marked as Kipper Exhibit 8? Thank you. Dr. Kipper, I think you do remember this email from earlier in your deposition?

Dr. Kipper: Yes, I do.

Ms. Meyers: And I believe you testified that you recall sending this email to Ms. Dembrowski on August 18th, 2014, correct?

Dr. Kipper: Yes.

Ms. Meyers: At the time you wrote this email, how long had you known Mr. Depp?

Dr. Kipper: Approximately four months.

Ms. Meyers: And in those four months, how much time had you spent with Mr. Depp, in person?

Dr. Kipper: I couldn't give you a cumulative number of hours, but I would say...I would estimate that...including up until August 18, I would guesstimate 20 hours.

Ms. Meyers: Is it fair to say that when you wrote this email, most of the time you had known Mr. Depp or spent with Mr. Depp was while he was in detox?

Dr. Kipper: Yes.

Ms. Meyers: During the time that you were with Mr. Depp on the island for his detox process, did you ever witness him physically abuse Ms. Heard?

Dr. Kipper: No, never.

Ms. Meyers: Did you ever see any physical evidence that Mr. Depp had abused Ms. Heard?

Dr. Kipper: No. Same answer, never.

Ms. Meyers: And during your time on the island, did you witness Ms. Heard abuse Mr. Depp in any way?

Dr. Kipper: No.

Ms. Meyers: Do you recall when Ms. Heard first became your patient?

Dr. Kipper: No, I couldn't give you a definitive date.

Ms. Meyers: It would have been before October 2014, though, correct?

Dr. Kipper: Yes.

Ms. Meyers: And it would have been after Mr. Depp's detox on the island in August 2014, is that right?

Dr. Kipper: That's correct.

Ms. Meyers: All right. When you started treating Ms. Heard, did you assign a nurse to her? When you started treating Ms. Heard, was there a nurse that you assigned to her?

Dr. Kipper: I can't recall whether...Ms. Meyers, it was when I started to treat her, at some point, I did assign a nurse to her. But I can't tell you which came first. I believe I was treating her before I had recommended a nurse for her.

Ms. Meyers: So your recollection is that you started treating her, and after that, a nurse was assigned?

Dr. Kipper: That's my memory, yes.

Ms. Meyers: Do you have a sense of how close in time to you beginning her treatment the nurse was assigned to Ms. Heard?

Dr. Kipper: It couldn't have been too long. But I honestly can't give you a specific reference of time.

Ms. Meyers: Do you remember that nurse's name?

Dr. Kipper: Erin Boerum.

Ms. Meyers: And is Ms. Boerum a registered nurse?

Dr. Kipper: Yes.

Ms. Meyers: And I believe you covered this earlier, Ms. Boerum is a contractor for you?

Dr. Kipper: Yes.

Ms. Meyers: So she reports to you with respect to your patients that she covers?

Dr. Kipper: Correct.

Ms. Meyers: During the time that Ms. Heard was your patient and Ms. Boerum was assigned to her, how regular was Ms. Boerum checking in with Ms. Heard?

Dr. Kipper: Very regular. Very [inaudible 00:33:29] saw her, yes.

Ms. Meyers: Would she have seen her on a daily basis?

Dr. Kipper: I don't believe it was a daily basis, but she, I know, had daily contact with her in some way.

Ms. Meyers: Would Ms. Boerum have seen Ms. Heard in person on at least a weekly basis?

Dr. Kipper: Yes.

Ms. Meyers: Were there times that Ms. Boerum traveled with Ms. Heard?

Dr. Kipper: Yes.

Ms. Meyers: And as a registered nurse, does Ms. Boerum have an obligation to report any suspect active abuse of her patient to you? Alex, could you please pull up document H?

[00:34:11]

[silence]

[00:34:51]

Ms. Meyers: Alex, is this Kipper Exhibit 34?

Alex: Yes.

Ms. Meyers: Okay. Dr. Kipper, do you recognize this document?

Dr. Kipper: Yes.

Ms. Meyers: And what is it?

Dr. Kipper: It's an initial intake of that care.

Ms. Meyers: I'm going to scroll down a bit and just show you that there are future entries on this document as well. Do you see these?

Dr. Kipper: I do. I'm assuming...I don't wanna make an assumption, but I would believe these notes are from Erin Boerum. But if you'll give me a second to look at this, I can be more specific.

Ms. Meyers: Certainly. Let me know if you'd like me to scroll through the document a bit more, I can do that for you.

Dr. Kipper: Yes, these are notes from Erin Boerum.

Ms. Meyers: Does this document reflect any of your own notes on Ms. Heard?

Dr. Kipper: This reflects my treatment recommendations.

Ms. Meyers: But these are Ms. Boerum's notes, I believe.

Dr. Kipper: Yes.

Ms. Meyers: Did you ask Ms. Boerum to maintain these notes?

Dr. Kipper: Yes.

Ms. Meyers: And for what purpose?

Dr. Kipper: Because she was monitoring a patient, and I needed to be informed of how the patient was doing or any adjustments of treatment.

Ms. Meyers: Did you tell Ms. Boerum what type of information should be documented in the notes?

Dr. Kipper: No.

Ms. Meyers: And would there be anything that you expressly asked her not to document?

Dr. Kipper: No.

Ms. Meyers: Do you understand that Ms. Boerum used her training and judgment in preparing these notes?

Dr. Kipper: Yes, I do.

Ms. Meyers: You weren't telling her what to include in these notes, she was drafting them on her own. Is that correct?

Dr. Kipper: That's correct.

Ms. Meyers: Have you reviewed these notes before?

Dr. Kipper: I have reviewed these notes.

Ms. Meyers: Have you reviewed them in their entirety?

Dr. Kipper: Yes, but not recently.

Ms. Meyers: And how often would you review Ms. Boerum's notes on Ms. Heard?

Dr. Kipper: I review my nurses' notes as they come in, so that would be on a real-time basis.

Ms. Meyers: Okay. And going back to the first page, do you see this entry is dated August 27th, 2014?

Dr. Kipper: Yes.

Ms. Meyers: Does this refresh your recollection as to when Ms. Boerum would have been assigned to Ms. Heard?

Dr. Kipper: Yes.

Ms. Meyers: And does this at all refresh your recollection as to when you started treating Ms. Heard?

Dr. Kipper: Yes, this would be about the time.

Ms. Meyers: Prior to the time that you treated Ms. Heard, did she ever seek treatment from you for injuries that appeared to be the result of domestic abuse?

Dr. Kipper: No, she did not.

Ms. Meyers: Did she ever seek treatment from you for any injuries that she told you were caused by Mr. Depp?

Dr. Kipper: No, she did not.

Ms. Meyers: Did Ms. Heard ever tell you that Mr. Depp abused her?

Dr. Kipper: No, she did not.

Ms. Meyers: And you never witnessed any physical abuse by Mr. Depp against Ms. Heard during the time that you treated both of them?

Dr. Kipper: No, never.

Ms. Meyers: If Ms. Boerum observed that Ms. Heard had any physical injuries, is this something that would have been documented in her patient notes for Ms. Heard?

Dr. Kipper: Yes, absolutely.

Ms. Meyers: In March 2015, you traveled down to Australia to attend to Mr. Depp, is that right?

Dr. Kipper: Yes.

Ms. Meyers: And at the time, Mr. Depp was already in Australia, correct?

Dr. Kipper: Correct.

Ms. Meyers: And was Ms. Lloyd with him?

Dr. Kipper: Yes.

Ms. Meyers: And was Ms. Heard with him?

Dr. Kipper: Yes.

Ms. Meyers: When you arrived in Australia, when did you first see Mr. Depp?

Dr. Kipper: I believe it was the day after I arrived.

Ms. Meyers: And where did you see him?

Dr. Kipper: I saw him at his home in Australia.

Ms. Meyers: And how long did you meet with him during that time?

Dr. Kipper: Probably an hour.

Ms. Meyers: When you first met with Mr. Depp in Australia, did you see the home that he was staying in?

Dr. Kipper: Yes.

Ms. Meyers: And was it a standalone house?

Dr. Kipper: Yes.

Ms. Meyers: Was there a fence around the house?

Dr. Kipper: I'm sorry?

Ms. Meyers: Was there a fence around the house?

Dr. Kipper: That, I can't recall.

Ms. Meyers: Do you recall whether Mr. Depp's security team was at the property?

Dr. Kipper: Yes, they were.

Ms. Meyers: Where did you see them?

Dr. Kipper: I saw them in and around the house.

Ms. Meyers: Do you recall how many security personnel there were?

Dr. Kipper: Two to three.

Ms. Meyers: Now, after you arrived in Australia, at some point you were notified that Mr. Depp had been injured, correct?

Dr. Kipper: Yes.

Ms. Meyers: And I believe this was covered earlier in your deposition. You actually received a text message from Mr. Depp, correct?

Dr. Kipper: Yes.

Ms. Meyers: And after you received that message, did you go directly to Mr. Depp?

Dr. Kipper: Yes.

Ms. Meyers: And Ms. Lloyd came with you?

Dr. Kipper: Yes.

Ms. Meyers: And I believe you said that Mr. Depp was outside the property, in a car, at that time, right?

Dr. Kipper: That's correct.

Ms. Meyers: Was Mr. Depp's security team there with him?

Dr. Kipper: Yes.

Ms. Meyers: And you examined Mr. Depp in the car with his security present?

Dr. Kipper: Yes, I saw him seated in the car when I arrived.

Ms. Meyers: Did Mr. Depp tell you what had happened to his finger at that time?

Dr. Kipper: Yes.

Ms. Meyers: How long did you attend to Mr. Depp outside of the house?

Dr. Kipper: Not long, probably a half hour, because I needed to get him to the emergency room.

Ms. Meyers: So immediately after meeting him at the house, you went with him to the emergency room?

Dr. Kipper: Yes. I cleaned his wound to the best that I could with the supplies that we had, and then took him. So it was within a half hour that we left.

Ms. Meyers: Did you return to the house after bringing Mr. Depp to the hospital?

Dr. Kipper: No, I was taken back to my hotel.

Ms. Meyers: After you attended to Mr. Depp, and before you went to the hospital with him, did you go inside the house?

Dr. Kipper: No.

Ms. Meyers: So you did not go inside the property the day that Mr. Depp contacted you about his injured finger?

Dr. Kipper: No, I did go into the house. As I had stated that after I saw him initially, I went into the home to see the home. I had...

Ms. Meyers: So that was before you went to the hospital with him?

Dr. Kipper: Yes, I went in to instruct one of the people with him to look for the tip of the finger, hoping that we would be able to put it back.

Ms. Meyers: Was the tip of the finger found?

Dr. Kipper: It was found.

Ms. Meyers: Who found it?

Dr. Kipper: I believe this man was their chef.

Ms. Meyers: And do you know where he found it, or where he told you he found it?

Dr. Kipper: He said he found it in the kitchen area.

Ms. Meyers: When you went into the house, did you see Ms. Heard?

Dr. Kipper: Yes.

Ms. Meyers: And how did she appear?

Dr. Kipper: She was certainly upset.

Ms. Meyers: Did Ms. Heard seek any medical attention from you for any injuries at that time?

Dr. Kipper: No.

Ms. Meyers: Did Ms. Heard seek any medical attention from Ms. Lloyd at that time?

Dr. Kipper: No.

Ms. Meyers: Did you observe any physical injuries to Ms. Heard when you saw her that [inaudible 00:45:32] 2015?

Dr. Kipper: No.

Ms. Meyers: So Ms. Heard did not have any observable bruises that you saw?

Dr. Kipper: That's correct.

Ms. Meyers: And did Ms. Heard appear to have a broken nose? Was Ms. Heard's face swollen at all when you saw her?

Dr. Kipper: Not that I was aware of, no.

Ms. Meyers: Did Ms. Heard have any cuts on her arms when you saw her?

Dr. Kipper: Not that I can recall.

Ms. Meyers: Do you recall seeing any cuts on her feet or any other part of her body?

Dr. Kipper: I can't recall.

Ms. Meyers: If Ms. Heard had appeared to have been injured, is this something that you would have documented?

Dr. Kipper: Yes.

Ms. Meyers: Did you observe any broken glass in the house?

Dr. Kipper: Yes.

Ms. Meyers: Could you tell what the glass was from?

Dr. Kipper: No.

Ms. Meyers: Was there blood around the broken glass?

Dr. Kipper: There was blood around the home, as I had previously mentioned, but I didn't specifically see blood on glass.

Ms. Meyers: Where did you see the broken glass?

Dr. Kipper: In the kitchen area.

Ms. Meyers: And that's where the part of the finger was found as well?

Dr. Kipper: Yes.

Ms. Meyers: Alex, could you please bring up what I believe is marked as Kipper Exhibit 17? Dr. Kipper, you recognize this document from earlier in the deposition?

Dr. Kipper: Yes.

Ms. Meyers: It's a letter dated March 15th, 2015, from you to Mr. Depp, correct?

Dr. Kipper: Correct.

Ms. Meyers: And you did send this letter to Mr. Depp, correct?

Dr. Kipper: Correct.

Ms. Meyers: Alex, could you please pull up what I've marked a document today, and I believe will be Kipper Exhibit 35.

[00:48:23]

[silence]

[00:48:47]

Ms. Meyers: Dr. Kipper, do you recognize this document?

Dr. Kipper: Yes.

Ms. Meyers: And what is it?

Dr. Kipper: For my verification, can you scroll down to the bottom, please?

Ms. Meyers: Sure. It goes on for two pages.

Dr. Kipper: Yes. I'm familiar with this document, yes.

Ms. Meyers: Did you prepare this document?

Dr. Kipper: No.

Ms. Meyers: Is this is a document that was prepared by someone who works for you?

Dr. Kipper: This was prepared by Monroe Tinker, who is a nurse practitioner, who worked for me at that time.

Ms. Meyers: Is this is a record that's ordinarily prepared and maintained in the course of your business?

Dr. Kipper: Yes.

Ms. Meyers: And have you reviewed this document before?

Dr. Kipper: Yes.

Ms. Meyers: When would you have reviewed it?

Dr. Kipper: I reviewed it immediately after the visit, probably the next day. And I also reviewed this a couple weeks ago.

Ms. Meyers: And I'd just like to direct your attention to the last page. Is this your signature here?

Dr. Kipper: Yes.

Ms. Meyers: And when would you have signed this?

Dr. Kipper: That was confirming that I reviewed Mr. Tinker's notes.

Ms. Meyers: Okay. Going back to the top, this is a patient record for Ms. Heard, correct?

Dr. Kipper: Yes.

Ms. Meyers: And where it says "Date: December 17th, 2015," that's the date of this document?

Dr. Kipper: Yes.

Ms. Meyers: And the document states a phone call consultation, headache, correct?

Dr. Kipper: Yes.

Ms. Meyers: So, does that mean that on December 17th, 2015, Ms. Heard called the offices to report a headache?

Dr. Kipper: Yes.

Ms. Meyers: And right below this, there's a paragraph that starts out with "HPI." What does that stand for?

Dr. Kipper: History of present illness.

Ms. Meyers: And is the information in this paragraph what Ms. Heard reported during her phone consultation?

Dr. Kipper: [inaudible 00:51:42] written. I was not there, but that's what's written.

Ms. Meyers: States, "Today, the patient reports a headache after she bumped her head while standing up two days ago," correct?

Dr. Kipper: Yes.

Ms. Meyers: And a couple sentences below that, it says, "Last seen in the office on 12/23/2015." Is that an error, or did she come back in later?

Dr. Kipper: No, I think that's gotta be an error.

Ms. Meyers: So, based on this document, it's your understanding that Ms. Heard called the office on December 17th?

Dr. Kipper: Yes.

Ms. Meyers: Scrolling down to the bottom here, it says, "[inaudible 00:52:31] data, physical exam." Do you see that?

Dr. Kipper: Yes.

Ms. Meyers: Does that mean that Ms. Heard came into the offices for a physical examination?

Dr. Kipper: That's what it signifies, yes.

Ms. Meyers: And would that have also been on December 17th, 2015?

Dr. Kipper: Yes. This note reflects that visit. Everything in this note reflects that visit.

Ms. Meyers: And so Monroe would have also performed that physical examination?

Dr. Kipper: Monroe did perform that physical examination. I did not see Ms. Heard. Monroe saw Ms. Heard.

Ms. Meyers: The information below this heading of physical exam, which goes onto the next page, are these the findings from Ms. Heard's physical exam on December 17th?

Dr. Kipper: Correct.

Ms. Meyers: And if Ms. Heard had any physical injuries, would those have been noted in this portion of the document?

Dr. Kipper: Yes.

Ms. Meyers: And there are some medical terms in here, so if you could let me know, does any of this indicate that there were physical injuries that were documented?

Dr. Kipper: No.

Ms. Meyers: Does this document indicate that a concussion check was performed?

Dr. Kipper: Yes.

Ms. Meyers: And what were the results of that?

Dr. Kipper: Under the assessment and plan as written, Mr. Tinker did not indicate concussion under his assessment.

Ms. Meyers: Under assessment and plan, item 4 says that "Dr. Kipper is aware of the medical plan and is in agreement." That's consistent with your recollection?

Dr. Kipper: Yes.

Ms. Meyers: And I believe you testified you didn't see Ms. Heard on December 17th, correct?

Dr. Kipper: That's correct.

Ms. Meyers: How were you informed of the medical plan?

Dr. Kipper: I spoke to Mr. Tinker by telephone.

Ms. Meyers: And would that conversation have happened on the 17th as well?

Dr. Kipper: Yes.

Ms. Meyers: And Alex, could you please pull up document L?

[00:55:13]

[silence]

[00:55:36]

Ms. Meyers: And I believe this is what will be marked as Kipper Exhibit 36. Dr. Kipper, do you recognize this document?

Dr. Kipper: Yes, I recognize it upon looking at it, yes.

Ms. Meyers: What do you recognize this document as?

Dr. Kipper: As an email from Ms. Heard to me, requesting medical records for that month of December.

Ms. Meyers: December 2015?

Dr. Kipper: Yes.

Ms. Meyers: And do you recall receiving this email?

Dr. Kipper: I don't recall receiving it, but I'm sure I did, and I'm sure I reviewed it. Yes.

Ms. Meyers: And do you see that the email is dated August 8th, 2016, correct?

Dr. Kipper: Yes.

Ms. Meyers: And you have no reason to doubt that you received the email on or around that date?

Dr. Kipper: Correct.

Ms. Meyers: On August 8th, 2016, was Ms. Heard still your patient?

Dr. Kipper: I believe so, but I can't be sure.

Ms. Meyers: Now, I'm gonna read from this email here. Ms. Heard writes to you, "As per our conversation earlier, is it possible to get my medical records from the month of December, please? I know I saw Monroe during one of my office visits, if it makes it easier for you to find. I'm not sure. Anyway, it was great talking to you earlier." Ms. Heard references speaking to you earlier in this email, correct?

Dr. Kipper: Yes.

Ms. Meyers: Do you recall having spoken to Ms. Heard before receiving this email?

Dr. Kipper: I can't remember.

Ms. Meyers: You don't remember anything about a conversation that you might have had with Ms. Heard prior to receiving this email?

Dr. Kipper: No, I can't recall that.

Ms. Meyers: And I believe you already stated this, but you understand Ms. Heard to be requesting medical records from December 2015, correct?

Dr. Kipper: Correct.

Ms. Meyers: And Ms. Heard mentions Monroe in this email as well, correct?

Dr. Kipper: Correct.

Ms. Meyers: And Monroe is the nurse practitioner that Ms. Heard saw on December 17th, 2015, right?

Dr. Kipper: Yes.

Ms. Meyers: And did you provide Ms. Heard with her medical records for December 2015?

Dr. Kipper: I believe so.

Ms. Meyers: And do you recall what those records consisted of?

Dr. Kipper: The one we just reviewed.

Ms. Meyers: Was that the only one for December 2015?

Dr. Kipper: Again, I would have to research her chart for that information, but I know at least it was that note.

Ms. Meyers: Did Ms. Heard ever ask you for any other medical records?

Dr. Kipper: No.

Ms. Meyers: In the over six years that you've known Mr. Depp, have you ever witnessed him be physically abusive to any person?

Dr. Kipper: Never.

Ms. Meyers: And you've never witnessed him being physically abusive to Ms. Heard, correct?

Dr. Kipper: Correct.

Ms. Meyers: You've also known Ms. Heard for over six years at this point, correct?

Dr. Kipper: Yes, although I have not seen Ms. Heard for at least a couple years, perhaps three years.

Ms. Meyers: In the six years that you treated Ms. Heard, and the over six years that you've treated Mr. Depp, has Mr. Depp complained to you that Ms. Heard has physically abused him?

Dr. Kipper: No, not that I can recall.

Ms. Meyers: Have you ever witnessed Ms. Heard be physically abusive to Mr. Depp?

Dr. Kipper: No.

Ms. Meyers: Has anyone who works for you or reports to you ever reported to you that they witnessed Ms. Depp...or excuse me, Ms. Heard be physically abusive to Mr. Depp?

Dr. Kipper: No, not that I can recall.

Mr. Nadelhaft: You testified earlier, from questions from Ms. Meyers, that the tip of Mr. Depp's finger was found in the kitchen, found on the floor of the kitchen in the home in Australia, correct?

Dr. Kipper: Correct.

Mr. Nadelhaft: Do you know where the kitchen was, what floor the kitchen was?

Dr. Kipper: There was a downstairs below the kitchen area. I'm not really sure. I think those were bedrooms, but I'm not positive. So, this would be on the main floor. The kitchen was on the main floor as you went into the home.

Mr. Nadelhaft: And that's where the tip of the finger was found, in the kitchen, on the main floor?

Dr. Kipper: Yes.

Mr. Nadelhaft: No, there was a text message, where you got a text message from Mr. Depp.

Dr. Kipper: Yes.

Mr. Nadelhaft: And he said he cut his finger, correct?

Dr. Kipper: I think that's what it said, yes.

Mr. Nadehaft: Okay. And the reference from the emergency room said that Mr. Depp had sliced his finger with a knife, correct?

Dr. Kipper: Yes, that's what he told...because I was present for that. That's what he told the emergency room doctor.

Mr. Nadehaft: Okay. So Mr. Depp told the emergency room doctor that he had cut his finger with a knife, correct?

Dr. Kipper: Yes.

Mr. Nadelhaft: Okay. And you didn't put that in any of your notes that a bottle was thrown at Mr. Depp, correct?

Dr. Kipper: Correct.

Mr. Nadelhaft: Did Mr. Depp have any cuts anywhere else on his face, or anywhere else that would have come from glass? Now, if Ms. Heard told Ms. Boerum that Mr. Depp had hit her in the face several times, and sent her pictures of bruises, would you expect Ms. Boerum to report that in her notes?

Dr. Kipper: I would have expected Ms. Boerum to send me those pictures.

Mr. Nadelhaft: So you would have expected to see those pictures from Ms. Boerum, is that correct?

Dr. Kipper: Yes.

Mr. Nadelhaft: And you would have wanted Ms. Boerum to...if she had seen a text that said, "I was hit in the face by Ms. Heard," and then received pictures of bruises, that Ms. Boerum would report that to you, correct?

Dr. Kipper: Yes.

Mr. Nadelhaft: Is that an instruction that you gave to your nurses, to report to you any abuse that they saw or were reported to them?

Dr. Kipper: Yes. If they saw that as valid...Ms. Heard, for example. If somebody hurt Ms. Heard while she was under the direct care of Ms. Boerum, and Ms. Boerum documented that Ms. Heard had been injured, she certainly would have reported that to me.

Mr. Nadelhaft: That's what your expectation would be, that she would report it?

Dr. Kipper: Yes.

Ms. Meyers: Dr. Kipper, did you keep any notes of your treatment of Mr. Depp while he was in Australia?

Dr. Kipper: Other than the summary notes, no.

Ms. Meyers: And was Ms. Lloyd with you when Mr. Depp told you what had happened to his finger, before you brought him to the hospital?

Dr. Kipper: I believe yes. I'm not positive, but I believe yes, because she was helping me at the car to try to clean out that finger, which is when he explained what happened.

Ms. Meyers: So you believe that Ms. Lloyd would have heard Mr. Depp's explanation?

Dr. Kipper: I believe so.

Judge Azcarate: All right, that completes the deposition. And the next witness is also by deposition, is that correct?

Man: That's correct, Your Honor, Debbie Lloyd.

Judge Azcarate: All right. Well, why don't we go ahead and go ahead and take our morning break. It's a little early, but since the next witness is also by deposition, why don't we take our 15-minute break now so you can stretch for a little bit, and we'll come back in about 15 minutes, okay? So you can go ahead. Do not talk to anybody. Don't do any outside research, right? Okay, thank you. Fifteen minutes. I'm told this clock is right today, so we'll come back at 11:25, okay? All right, thank you. You have that?

Woman: [inaudible 01:05:03]. Yes, I have the [inaudible 01:05:05].

Judge Azcarate: Okay.

Mr. Nadelhaft: [inaudible 01:05:07]. And there's one that there's a disagreement on that we can address an hour later.

Judge Azcarate: Okay. Well, which one did you have a disagreement on? We might as well do it now before we go on to the next deposition.

Woman: Sure. So, the exhibit, it's invoices from Dr. Kipper.

Judge Azcarate: What number is it?

Woman: I'm sorry, it is...

Man: [inaudible 01:05:30]

Woman: That's correct. And we have no objection to the document coming in. It's just we have a disagreement about the redactions.

Judge Azcarate: All right, if you wanna come forward, then we will take a look at the... And you said 1067, correct?

Man: Correct, Your Honor.

Judge Azcarate: Okay. [inaudible 01:05:46].

Man: Yes, Your Honor.

Judge Azcarate: Ms. Bredehoft, are you ready for the jury? Are you ready for the Jury?

Ms. Bredehoft: [inaudible 01:05:51]

Judge Azcarate: I just wanted to make sure.

Ms. Bredehoft: [inaudible 01:05:52]

Judge Azcarate: That's right. Thank you. All right. Thank you. Nice. Just for the record, I assume, juror number 10, that that's the address to your employer, because you need a letter from your employer. Is that correct?

Man: Yes.

Judge Azcarate: Okay. So, the court's gonna do a letter for his employer so he can be released from work for six weeks. So that's what that information is, just for the record, is just his employer's address. Okay. All right, thank you. All right. Are we ready for your next witness?

Man: Yes, Your Honor. Mr. Depp calls Debbie Lloyd, via video tape.

Judge Azcarate: By deposition. Okay.

Mr. Nadelhaft: ...California?

Debbie: Yes.

Mr. Nadelhaft: And you do not live or work in Virginia, correct?

Debbie: Correct.

Mr. Nadelhaft: Okay. Have you, at any time, spoken with... Can you please provide your full name?

Debbie: Debra Lynn Lloyd.

Mr. Nadelhaft: And Ms. Lloyd, you live in California?

Debbie: Yes.

Mr. Nadelhaft: And you work in California?

Debbie: Yes.

Mr. Nadelhaft: And you do not live or work in Virginia, correct?

Debbie: Correct.

Mr. Nadelhaft: Have you, at any time, spoken with Mr. Depp or any of his counsel, either in preparation for this deposition or for any other matter after you no longer worked with Mr. Depp?

Debbie: Yes.

Mr. Nadelhaft: Do you recall who you spoke to?

Debbie: I believe her name was Camille.

Mr. Nadelhaft: And do you recall when you spoke to Camille, approximately?

Debbie: Two weeks ago.

Mr. Nadelhaft: Okay. And what did Camille and you discuss?

Debbie: She had asked me if Johnny had ever thrown anything at me.

Mr. Nadelhaft: And what did you say?

Debbie: No.

Mr. Nadelhaft: Was that the total of your communications with Camille?

Debbie: That was the only time that I remember speaking to her.

Mr. Nadelhaft: Did you speak about anything else other than whether... And when you say Johnny, I assume you mean Mr. Depp, correct?

Debbie: Yes.

Mr. Nadelhaft: Did you discuss anything else other than whether Mr. Depp had thrown something at you?

Debbie: They had asked if I would be willing to go to Virginia to the trial.

Mr. Nadelhaft: And are you willing to go to Virginia to be a trial witness?

Debbie: No.

Mr. Nadelhaft: Okay. At any time, did you have any other...do you recall anything else you and Camille spoke about?

Debbie: Not in detail.

Mr. Nadelhaft: Okay. Do you know how long the conversation was, approximately?

Debbie: Approximately 15 minutes.

Mr. Nadelhaft: Was it over the phone?

Debbie: Yes.

Mr. Nadelhaft: Do you recall, at any other time, having any other communications with any other counsel for Mr. Depp?

Debbie: No. There was somebody else on that call, I believe, from his side, but I don't know who it was.

Mr. Nadelhaft: Do you recall if it was a man, or a woman?

Debbie: A man.

Mr. Nadelhaft: Do you ever speak to Adam Waldman?

Debbie: I know an Adam reached out to me a long time ago. I don't remember a last name.

Mr. Nadelhaft: You're a psychiatric mental health nurse practitioner?

Debbie: Yes.

Mr. Nadelhaft: Can you briefly explain what that is?

Debbie: I'm a nurse practitioner that specializes in psychiatry.

Mr. Nadelhaft: And where did you go to school for that?

Debbie: I got my master's from Maryville University.

Mr. Nadelhaft: Is that in California?

Debbie: It's in Illinois. No, in Missouri, St. Louis, Missouri. Sorry.

Mr. Nadelhaft: No problem. And I understand you're also a certified addiction nurse?

Debbie: Yes.

Mr. Nadelhaft: And can you briefly explain what that is?

Debbie: I had to get a certification in addiction nursing.

Mr. Nadelhaft: And what is addiction nursing?

Debbie: Nursing that specializes in taking care of patients with chemical dependency issues.

Mr. Nadelhaft: And chemical dependency, that's drugs and alcohol?

Debbie: Yes.

Mr. Nadelhaft: Okay. How long have you worked in those fields, addiction nursing and mental health nursing?

Debbie: Since 2004.

Mr. Nadelhaft: And would you agree that one of your specialties is concierge addiction services?

Debbie: It was, yes.

Mr. Nadelhaft: What are concierge addiction services?

Debbie: We would...good question. Mainly deal with higher-end clients and provide care, go to their home rather than have them come in to facilities.

Mr. Nadelhaft: And would you, at times, provide 24/7 nursing care?

Debbie: Yes.

Mr. Nadelhaft: Okay. And you'd also be a patient's travel companion for nursing care?

Debbie: Yes.

Mr. Nadelhaft: Okay. And you own your own company?

Debbie: Yes.

Mr. Nadelhaft: And what was the company's name?

Debbie: Turning Point.

Mr. Nadelhaft: Okay. And do you still own Turning Point?

Debbie: Yes.

Mr. Nadelhaft: Okay. And what does Turning Point do?

Debbie: Provides services...it's actually no longer...I still own it, but I don't work with it anymore. It provides services to either nursing or Silver Companions services to patients.

Mr. Nadelhaft: And when did you start Turning Point?

Debbie: I don't recall the exact year.

Mr. Nadelhaft: Okay. Does anyone else own it?

Debbie: No.

Mr. Nadelhaft: How many people work at Turning Point?

Debbie: I'm the only employee.

Mr. Nadelhaft: And what do you have, contract nurse aids who work for you?

Debbie: I did, yes.

Mr. Nadelhaft an: And what does Turning Point do now, if anything?

Debbie: Sits dormant.

Mr. Nadelhaft: Okay. And when did it start to sit dormant?

Debbie: About two years ago.

Mr. Nadelhaft: Is there any particular reason why?

Debbie: That's when I became a nurse practitioner and changed my career path.

Mr. Nadelhaft: And where do you work now?

Debbie: I work for Headlands Addiction Treatment Services.

Mr. Nadelhaft: What do you do there?

Debbie: Nurse practitioner.

Mr. Nadelhaft: Okay. Is there a difference between a nurse practitioner and a nurse?

Debbie: Nurse practitioner, I can diagnose and prescribe medications underneath a doctor's supervision.

Mr. Nadelhaft: So, when you were working at Turning Point, were you a nurse practitioner?

Debbie: No.

Mr. Nadelhaft: Okay. What was your title then?

Debbie: Registered nurse.

Mr. Nadelhaft: And you performed work for Mr. Depp, correct?

Debbie: Yes.

Mr. Nadelhaft: Was that with Turning Point?

Debbie: Turning Point was contracted through Dr. Kipper.

Mr. Nadelhaft: Okay. Can you explain how that arose, how you began to work for Mr. Depp through Dr. Kipper?

Debbie: Dr. Kipper was his doctor, and he needed nursing services, so Dr. Kipper reached out to me.

Mr. Nadelhaft: And it's Dr. David Kipper, correct?

Debbie: Correct.

Mr. Nadelhaft: Had you worked with Dr. Kipper before working with Mr. Depp?

Debbie: Yes.

Mr. Nadelhaft: Do you know when you started working for Mr. Depp, approximately?

Debbie: Approximately...I think it was 2015 or '16.

Mr. Nadelhaft: Okay. And we can look at some documents, and that may help. Do you know how many patients you had worked with, with Dr. Kipper, before working with Mr. Depp?

Debbie: That would be a guestimate.

Mr. Nadelhaft: Okay. Do you have any approximation?

Debbie: Twenty.

Mr. Nadelhaft: And when Dr. Kipper reached out to you about Mr. Depp, did he reach out to you by phone or by written communication?

Debbie: By phone.

Mr. Nadelhaft: Do you recall what Dr. Kipper told you he was looking for in regards to Mr. Depp's care?

Debbie: Detox.

Mr. Nadelhaft: And detox from what?

Debbie: Originally, I don't think I knew any of the specifics.

Mr. Nadelhaft: What did you come to understand Mr. Depp was looking to detox from?

Debbie: Opioids.

Mr. Nadelhaft: Any other medication...or any other drugs that Mr. Depp was looking to detox from?

Debbie: Not that I recall.

Mr. Nadelhaft: Okay. Do you know if Mr. Depp ever took cocaine?

Judge Azcarate: [inaudible 01:15:45] answer, kiddo.

Debbie: I never witnessed him use any cocaine.

Mr. Nadelhaft: Okay. So, did Dr. Kipper contract with your company for care for Mr. Depp?

Debbie: I don't recall the specifics of how we were brought on.

Mr. Nadelhaft: Okay. How were you paid?

Debbie: Through Dr. Kipper.

Mr. Nadelhaft: Did you have to submit your time to Dr. Kipper?

Debbie: Yes.

Mr. Nadelhaft: For Depp's services. Did Mr. Depp ever pay you directly?

Debbie: No.

Mr. Nadelhaft: Did you ever get any gifts from Mr. Depp?

Debbie: Yes.

Mr. Nadelhaft: Okay, what gifts did you receive from Mr. Depp?

Debbie: I remember getting a jewelry box and a...I forget what it's called, like a notepad, a fancy notepad, I guess.

Mr. Nadelhaft: Do you recall why Mr. Depp gave you the jewelry box? And you can answer that.

Debbie: I don't know why. I believed it was for a thank-you.

Mr. Nadelhaft: Okay. And the same, you believed it was a thank-you with the fancy notepad that you received?

Debbie: It was at the same time.

Mr. Nadelhaft: Okay. Did you receive anything else, ever, from Mr. Depp?

Debbie: Not that I recall.

Mr. Nadelhaft: Okay. Do you still do work for Dr. Kipper?

Debbie: I have not recently.

Mr. Nadelhaft: Do you recall when you last worked with Dr. Kipper?

Debbie: Not exactly.

Mr. Nadelhaft: Do you remember the year you stopped working with Dr. Kipper?

Debbie: No.

Mr. Nadelhaft: Okay. Do you recall the last time you've spoken to Dr. Kipper?

Debbie: This week, [inaudible 01:18:00].

Mr. Nadelhaft: Well, what did you talk to Dr. Kipper about this week?

Debbie: He's my personal doctor.

Mr. Nadelhaft: Okay. So, did you speak to Dr. Kipper at all about this case?

Debbie: No.

Mr. Nadelhaft: Have you ever spoken to Dr. Kipper about your deposition?

Debbie: No.

Mr. Nadelhaft: Have you ever spoken to Dr. Kipper about his deposition?

Debbie: Yes.

Mr. Nadelhaft: And you know who Erin Boerum is, correct?

Debbie: Yes.

Mr. Nadelhaft: And who is she?

Debbie: She's a nurse that worked with us.

Mr. Nadelhaft: And Ms. Boerum worked for Turning Point, is that right?

Debbie: Yes.

Mr. Nadelhaft: And did you hire Ms. Boerum?

Debbie: Yes.

Mr. Nadelhaft: Was Ms. Boerum a salaried employee of Turning Point?

Debbie: No.

Mr. Nadelhaft: So, Ms. Boerum was a contract employee for Turning Point, correct?

Debbie: Correct.

Mr. Nadelhaft: So, in kind of general sense, how did that work with Ms. Boerum in Turning Point?

Woman: Objection [inaudible 01:19:14].

Mr. Nadelhaft: If you needed her for a particular case, you'd hire her for that case?

Debbie: Yes.

Mr. Nadelhaft: Okay. And you're saying your testimony is that you had hired Ms. Boerum previously for other patients, is that right? Before Mr. Depp and Ms. Heard?

Debbie: Yes.

Mr. Nadelhaft: Okay. And do you recall how Ms. Boerum came to work for Mr. Depp and Ms. Heard?

Woman: And do you recall how Ms. Boerum came to work for Mr. Depp and Ms. Heard?

Debbie: Yes.

Mr. Nadelhaft: How did that happen? What happened?

Debbie: I was taking care of Johnny, and it was decided that Amber needed some support, so I brought her in for Amber.

Mr. Nadelhaft: So, were you Mr. Depp's primary nurse?

Debbie: Yes.

Mr. Nadelhaft: And was Ms. Boerum Amber's primary nurse?

Debbie: Yes.

Mr. Nadelhaft: Okay. And would you ever share responsibilities, where Ms. Boerum would perform nursing care for Mr. Depp, and you would perform nursing care for Amber?

Debbie: I know Erin covered for me a few times. I do not believe I ever cared for Amber.

Mr. Nadelhaft: And you said that a decision was made that Amber needed nursing care?

Debbie: Yes.

Mr. Nadelhaft: Who made that decision?

Debbie: I don't recall.

Mr. Nadelhaft: Can we put up attachment 2, and we'll call this Lloyd Exhibit 1.

Woman: [inaudible 01:21:08].

Mr. Nadelhaft: Thanks.

Woman: Exhibit 1.

Mr. Nadelhaft: Now, Ms. Lloyd, I'm showing you what's been marked as Lloyd Exhibit 1. You'll see it's many pages. And we're gonna go through some of these during the day. But just looking at it, do you recognize what this is?

Debbie: Yes.

Mr. Nadelhaft: And what is Lloyd Exhibit 1?

Debbie: My nursing notes.

Mr. Nadelhaft: Okay. And so these are notes that you created?

Debbie: Yes.

Mr. Nadelhaft: Okay. And these are notes you created for your care of Mr. Depp, is that right?

Debbie: Correct.

Mr. Nadelhaft: And if at break, you would wanna go over and see the whole thing, I'm, you know, happy to let you do that just to save time, rather than having your read 123 pages. But did you create these notes in the ordinary course of business?

Debbie: Can you clarify what that means?

Mr. Nadelhaft: You created these notes as part of your job of being a nurse, correct?

Debbie: Yes.

Mr. Nadelhaft: Okay. Did Dr. Kipper ask you to keep these notes?

Debbie: We just keep notes as nurses. I don't recall.

Mr. Nadelhaft: Okay. So this is your normal practice, keeping these notes. It's not particular to Mr. Depp, correct?

Debbie: Correct.

Mr. Nadelhaft: Okay. Did you receive any training into how to keep these notes?

Debbie: Nursing school.

Mr. Nadelhaft: Okay. And the notes are typed, right?

Debbie: Yes.

Mr. Nadelhaft: Okay. Did you bring a laptop with you when you were working with Mr. Depp?

Debbie: Yes.

Mr. Nadelhaft: Okay. Let's just go to the first one. It says June 12th, 2014, 2300. Do you see that?

Debbie: Yes.

Mr. Nadelhaft: Okay. And 2300, that's military time, correct?

Debbie: Yes.

Mr. Nadelhaft: So that's 11:00 p.m. at night?

Debbie: Yes.

Mr. Nadelhaft: Okay. And it says, "RN and MD met with patient to discuss plan and medication regime." Do you see that?

Debbie: Yes.

Mr. Nadelhaft: Okay. The RN is you, correct?

Debbie: Correct.

Mr. Nadelhaft: And the MD is Dr. Kipper?

Debbie: Correct.

Mr. Nadelhaft: And the patient is Mr. Depp, right?

Debbie: Correct.

Mr. Nadelhaft: Okay. So, where it says, "6/12/14 at 2300," is that when you met with Mr. Depp, or is that when you wrote up the note?

Debbie: That's when I wrote up the note.

Mr. Nadelhaft: Okay. So you may have met with Mr. Depp at some other time before this?

Debbie: Sometime during that day.

Mr. Nadelhaft: Okay. So the time you have here is when you wrote the note?

Debbie: Correct.

Mr. Nadelhaft: Okay. And would you typically type the notes as opposed to writing notes and handwriting it and then typing notes?

Debbie: Correct.

Mr. Nadelhaft: Okay. Did anyone review the notes?

Judge Azcarate: You can answer, kiddo.

Debbie: The notes were sent to Dr. Kipper.

Mr. Nadelhaft: How often would you send the notes to Dr. Kipper?

Debbie: I don't recall.

Mr. Nadelhaft: And was there a system where he could see the notes, or did you email Dr. Kipper the notes?

Debbie: Email.

Mr. Nadelhaft: Okay. So, is it your understanding, based on these notes, that the first time you met Mr. Depp was on June 12th, 2014?

Debbie: Yes.

Mr. Nadelhaft: And if we scroll down to the 06/13/14, this says you met with patient in his apartment, correct?

Debbie: Correct.

Mr. Nadelhaft: So, the next day, you met with Mr. Depp in his apartment, is that right?

Debbie: According to my notes. I don't recall.

Mr. Nadelhaft: Okay. And in the second line, you write, "He stated that he initially started taking opiates after some dental work and became dependent on them." Is that something that Mr. Depp told you?

Debbie: According to my notes.

Mr. Nadelhaft: Would there be a reason you would write that if Mr. Depp did not tell you that?

Debbie: No.

Mr. Nadelhaft: Okay. And then you write, "Patient is fearful of coming off of opiates, but knows it's what he needs to do." So again, that's something, according to your notes, that Mr. Depp told you?

Debbie: According to my notes, yes.

Mr. Nadelhaft: And then it says, Patient also expressed some emotional trauma which causes him depression and anxiety. Again, according to your notes, that's what Mr. Depp told you?

Debbie: According to my notes, yes.

Mr. Nadelhaft: Do you recall at all what the emotional trauma was that was causing Mr. Depp depression and anxiety?

Debbie: I do not recall.

Mr. Nadelhaft: Okay. Let me ask this again, do you recall what the plan was for Mr. Depp's detox as of the end of June 2014?

Debbie: Plan in what regards?

Mr. Nadelhaft: Where was Mr. Depp's detox going to take place?

Debbie: I don't remember when it was determined, but I remember that it was after filming, we would go to the island.

Mr. Nadelhaft: And that's the island that Mr. Depp owns?

Debbie: Yes.

Mr. Nadelhaft: And you went to the island, correct?

Debbie: Correct.

Mr. Nadelhaft: Who else was on the island in this time when Mr. Depp was doing the detox?

Judge Azcarate: You can answer, kiddo.

Debbie: I know I was there. I cannot remember if Amber was there the entire time, and some of Johnny's staff. And Dr. Kipper came at some point.

Mr. Nadelhaft: Okay. How did you get to Mr. Depp's island?

Debbie: Flew.

Mr. Nadelhaft: And then what do you take, a boat to his island?

Debbie: Yes.

Mr. Nadelhaft: Okay. And if we go to, in the same document, Kipper 69, which I believe is page 17. There we go. You see where it says 814?

Debbie: Yes.

Mr. Nadelhaft: And it says, "Arrived on island today?"

Debbie: Yes.

Mr. Nadelhaft: Does that mean that you arrived on the island on August 8th, 2014?

Debbie: According to my notes.

Mr. Nadelhaft: Okay. And on August 9th, 2014, it says, "Patient expressed fears of never feeling normal without his drugs." You wrote that?

Debbie: Yes.

Mr. Nadelhaft: Okay. And is that something that Mr. Depp told you?

Debbie: According to my notes, yes.

Mr. Nadelhaft: And if we go two pages to Kipper 71. Yeah, there we go. You see where it says at the top, "MD's flight has been canceled."

Debbie: Yes.

Mr. Nadelhaft: "Arrangements are being made for him to arrive on the island 08/12/14."

Debbie: Yes.

Mr. Nadelhaft: So, according to your notes, Dr. Kipper, after the flight was canceled, was set to arrive on the island on August 12th, 2014?

Debbie: According to my notes.

Mr. Nadelhaft: Ms. Lloyd, I'm showing you what's been marked as Lloyd Exhibit 2, which is ALH16110 through 113. Do you remember texting with Amber at all while you were on the island with Mr. Depp?

Debbie: That is some of how we communicated, yes.

Mr. Nadelhaft: Okay. And does this refresh your recollection that Amber was, at least at some point, on the island with Mr. Depp during the detox?

Debbie: Yes.

Mr. Nadelhaft: The gray part of the text is your text, correct?

Debbie: Yes.

Mr. Nadelhaft: And the blue is Amber?

Debbie: Yes.

Mr. Nadelhaft: And the gray part of the text where it shows the phone number there, is that your cell phone number?

Debbie: Yes.

Mr. Nadelhaft: Ms. Lloyd, I'm showing you what's been marked as Exhibit 3, text message chain between you and Amber Heard on August 16th, 2014. And again, in the gray box where it shows a phone number, that's your phone number, correct?

Debbie: Correct.

Mr. Nadelhaft: Okay. And Ms. Lloyd, I'm showing what's been marked as Lloyd Exhibit 4, text message chain between you and Amber on August 18th, 2014. Do you see that?

Debbie: Yes.

Mr. Nadelhaft: Okay. Do you recall, when on the island, Amber would be telling you how Mr. Depp was doing?

Debbie: According to these texts, that's what was happening, yes.

Mr. Nadelhaft: Do you recall how long you were on the island?

Debbie: I do not.

Mr. Nadelhaft: Okay. In a day, do you recall how long you would see Mr. Depp?

Debbie: It varied.

Mr. Nadelhaft: Okay. Would there be reasons why it varied as to how long you'd see Mr. Depp in a day?

Debbie: I don't recall how it was determined.

Mr. Nadelhaft: How far away were you from where Mr. Depp was staying?

Debbie: Five to 10 minutes.

Mr. Nadelhaft: By foot or by some other transportation?

Debbie: By a John Deere tractor.

Mr. Nadelhaft: Okay. And what type of place were you staying in on the island?

Debbie: It was a yurt.

Mr. Nadelhaft: Okay. And were you staying with anyone?

Debbie: I was by myself some of the time, and then Dr. Kipper was also in the yurt for some of the time.

Mr. Nadelhaft: And did the yurt have separate rooms?

Debbie: Yes.

Mr. Nadelhaft: And would you typically eat with Mr. Depp?

Debbie: Varied.

Mr. Nadelhaft: And when you were on the island, what was your role in terms of Mr. Depp's detox?

Debbie: Medication management.

Mr. Nadelhaft: And what do you mean by medication management?

Debbie: To administer medications.

Mr. Nadelhaft: And was Dr. Kipper the person who was prescribing the medications?

Debbie: Yes.

Mr. Nadelhaft: As part of the medication management, did Mr. Depp get a bag of meds? You can answer. [inaudible 01:33:17].

Debbie: Did I give Mr. Depp a bag of medications?

Mr. Nadelhaft: Either you or Dr. Kipper?

Debbie: Not that I recall.

Mr. Nadelhaft: Okay. Staying on this last page for a second, of Lloyd 4, the picture of...looks like a pill box, right?

Debbie: Correct.

Mr. Nadelhaft: Would you have provided either Mr. Depp or Ms. Heard Mr. Depp's medications in a box like this?

Debbie: Yes.

Mr. Nadelhaft: Okay. Well, why don't we actually just take a break right for this moment? It would have been about an hour. Take a, I don't know, five minute break? Is there any reason to believe, where you wrote, "RN received text from fiancé," that that's not a text you received from Amber Heard?

Debbie: No.

Mr. Nadelhaft: Lloyd Exhibit 5 is a chart of text messages we received in a production from Dr. Depp. It is Depp 7819. Do you see the second entry, entry 131?

Debbie: Yes.

Mr. Nadelhaft: Okay. And where, in the third row, there's your name, and above that name is a phone number. Is that your phone number?

Debbie: Yes.

Mr. Nadelhaft: And you would sometimes text message with Mr. Depp too, correct?

Debbie: Correct.

Mr. Nadelhaft: Okay. You see it says in the body on that row 131, "I will come by 80 within an hour to drop meds off, just in case. How are you feelings? Your head back on straight?" Do you see that?

Debbie: I see that.

Mr. Nadelhaft: Okay. And this was a text you wrote to Mr. Depp?

Debbie: According to this.

Mr. Nadelhaft: All right. Do you recall, as of around August 26th, 2014, what you meant by "your head back on straight"?

Debbie: I don't recall.

Mr. Nadelhaft: And then Mr. Depp responded to you. You see in the next row? "Pretty much, I don't have the ability to take anything more on my back right now. I'm fucking strong. If my arm is gangrenous, I would cut the fucker off. I'm threatened by the love I feel. I need to stop, simple math." Do you recall receiving that text from Mr. Depp?

Debbie: I don't recall. No, I don't recall receiving that.

Mr. Nadelhaft: Okay. Do you have any reason to believe you did not receive this text from Mr. Depp?

Debbie: No.

Mr. Nadelhaft: If we go back to Exhibit 1, and if you can go to Kipper 101. Can you see where it says 0125, under September 22nd, 2014?

Debbie: Yes.

Mr. Nadelhaft: Okay. And you wrote, "RN received text from patient stating that he'd been in an argument with fiancé, and she 'had a nasty freak-out,' and he would like RN to come give him some 'fuckin' knockout yum yum.' RN instructed patient to take PRN Neurontin, 300 milligrams PRN and Seroquel, 50 milligrams, and that RN was on her way over." You wrote that?

Debbie: Yes.

Mr. Nadelhaft: Do you recall anything about what the "nasty freak-out" that Mr. Depp was referring to about Amber?

Debbie: I do not recall.

Mr. Nadelhaft: And then you see the note for 3:30 for September 22nd, 2014?

Debbie: Yes.

Mr. Nadelhaft: Okay. And again, that's 3:30 in the morning, right?

Debbie: Correct.

Mr. Nadelhaft: Okay. And you wrote, "Upon arriving at the home, patient was sitting in kitchen with scraped and bloody knuckles on right hand. Patient stated he'd 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 fiancé got upset that he was not giving her enough support. And the fight escalated from there." You wrote that note?

Debbie: According to this, yes.

Mr. Nadelhaft: Do you recall going to Mr. Depp's home and seeing him with scraped and bloody knuckles on his right hand?

Debbie: I do not recall.

Mr. Nadelhaft: Did you ever recall any incident where Mr. Depp had claimed he punched a whiteboard in the kitchen?

Debbie: I do not.

Mr. Nadelhaft: Okay. Do you have any reason to believe, where you wrote that...you wrote, "Upon arriving at the home, patient was sitting in kitchen with scraped and bloody knuckles on right hand." Would you have written that based on your observation of Mr. Depp?

Debbie: Yes.

Mr. Nadelhaft: On Kipper 111, there's a highlighted note at 1930 for October 14th. Do you see that?

Debbie: Oh, wait one minute. Yes.

Mr. Nadelhaft: Okay. And you wrote, "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." You wrote that?

Debbie: According to these notes, yes.

Mr. Nadelhaft: And were these notes based on your observation of Mr. Depp?

Debbie: I don't recall.

Mr. Nadelhaft: Did you ever attend filming where Mr. Depp was filming?

Debbie: Yes.

Mr. Nadelhaft: Where you wrote, "Patient kicked in the door of his trailer and refused to speak to director," that's based on your observation of Mr. Depp?

Debbie: I don't recall.

Mr. Nadelhaft: And where you wrote, "Patient was verbally aggressive to another person on the set, so no apparent reason," do you recall what that's based on?

Debbie: I do not.

Mr. Nadelhaft: Would it have been based on anything other than your observation of Mr. Depp?

Debbie: I don't recall.

Mr. Nadelhaft: If you had been told that Mr. Depp was verbally aggressive, would you have written that in your note?

Debbie: I don't recall.

Mr. Nadelhaft: Okay. And the note above it, for 1630, you see that?

Debbie: Yes.

Mr. Nadelhaft: All right. You wrote, "RN and MD arrived on set to assess patient." So that's you and Dr. Kipper, correct?

Debbie: Correct.

Mr. Nadelhaft: And you wrote, "Patient appeared agitated and was short towards RN." You wrote that?

Debbie: According to this, yes.

Mr. Nadelhaft: And where you wrote, "Patient appeared agitated and was short towards RN," meaning Mr. Depp was short towards you, correct?

Debbie: I don't remember.

Mr. Nadelhaft: That's what the note means, right? Is there a reason [crosstalk 01:41:02]?

Debbie: That's what the note says, yes.

Mr. Nadelhaft: Okay. And this note would have been based on your observation of Mr. Depp at the time, correct?

Debbie: I don't remember.

Mr. Nadelhaft: And then you see under October 15th, there's another highlighted entry, correct?

Debbie: Yes.

Mr. Nadelhaft: And you wrote, "Patient awake and states he slept from 2200 to 4:30." You see that?

Debbie: Yes.

Mr. Nadelhaft: "Patient continues to be agitated about work and is verbalizing having desire to escape with drugs." You wrote that?

Debbie: It's in my notes.

Mr. Nadelhaft: And that would mean that you wrote that note, correct?

Debbie: Correct.

Mr. Nadelhaft: And you would have written that note based off Mr. Depp telling you he had a desire to escape with drugs, correct? I'm sorry, did you answer it?

Debbie: Yes. I said I don't remember.

Mr. Nadelhaft: Okay. And this is Exhibit 8. [inaudible 01:42:10] text between you and Mr. Depp. Feel free to look through it.

Debbie: Okay.

Mr. Nadelhaft: Mr. Depp wrote, "I'm all right. Confused as fuck. She said nothing of last night, and most certainly not one thing of the rap party's existence. All the proof that I predicted last night, how I look at her when she gets back, professing her undying love. All a fucking lie. I for sure, unfortunately, wouldn't mind some company, but I've inundated you with too much already. Love, love, me." That's a text you received from Mr. Depp?

Debbie: I don't recall.

Woman: Exhibit 9.

Mr. Nadelhaft: And this is more text between you and Mr. Depp. [inaudible 01:43:06]. You can take a look through. On November 11th, 2014, Mr. Depp wrote, "All good. Haven't read her text yet. I'm feeling so fucked. Why was she at the goddamned rap party until 5:00 a.m.? Did Erin say anything? The lies are so clear now. They're making me nuts wondering what was so interesting to keep her there that goddamned long. Please ask Erin. I must have truth. I need it. It's not the easiest thing to do at this point, though it's been a shitty and painful experience. I cannot help but hear her voice begging and crying she wants to change and is going to change, etc. Help. I don't know what's real and what's paranoiac jealousy." You received that text from Mr. Depp?

Debbie: I don't recall.

Mr. Nadelhaft: And you don't recall...do you recall ever Mr. Depp not feeling trust for Amber?

Debbie: I don't recall.

Mr. Nadelhaft: While you were working with Mr. Depp, did he smoke marijuana?

Debbie: I don't recall.

Mr. Nadelhaft: Do you recall if he took any...if not smoked marijuana, ingested marijuana in any sort of way?

Debbie: I don't recall.

Woman: Exhibit 10.

Mr. Nadelhaft: Can you think of another instance where there was a patient, without giving me the patient's name or information, where they were allowed to continue to take marijuana while detoxing from other drugs?

Debbie: I don't recall.

Mr. Nadelhaft: Exhibit 11 is Lloyd 2 through 5. Do you recall producing documents in this matter?

Debbie: Yes.

Mr. Nadelhaft: Okay. And you produced text messages with Mr. Depp and with Ms. Heard?

Debbie: Yes.

Mr. Nadelhaft: Okay. And this is a text message between you and Amber, starting on December 26th, 2014. You see that?

Debbie: Yes.

Mr. Nadelhaft: Okay. And you understand that you're in the...the texts from you are the blue, correct?

Debbie: Okay.

Mr. Nadelhaft: All right. And you wrote, "Sorry to bother you. Is J.D. up? He has an important appointment at 2:00 p.m., and he isn't responding to me. Hope you guys had a beautiful Christmas." And Amber wrote, "Hey there. Yes he is. He's opening presents with Lily-Rose. What appointment? Is he being picked up?" Who's Lily-Rose?

Debbie: Johnny's daughter.

Mr. Nadelhaft: Did you ever see Mr. Depp super stoned when you were working with him?

Debbie: I don't recall.

Mr. Nadelhaft: Does that mean that you never saw him stoned, or you just don't recall one way or the other?

Debbie: I don't recall one way or another.

Mr. Nadelhaft: Do you know who "the Whit" is?

Debbie: Amber's sister.

Mr. Nadelhaft: Okay. Do you recall any time where Mr. Depp seemed confused about something that had occurred?

Debbie: I don't.

Mr. Nadelhaft: Did you ever recall Mr. Depp wondering if he and Amber had had a fight or if he was dreaming?

Debbie: I don't recall.

Mr. Nadelhaft: Do you recall Mr. Depp ever not taking the medications he was prescribed?

Debbie: Yes.

Mr. Nadelhaft: Okay. Did you recall Mr. Depp sometimes potentially doubling the medications that he was prescribed?

Debbie: I recall thinking that at times.

Mr. Nadelhaft: Did you believe that Mr. Depp wanted to detox off of drugs? What was your answer?

Debbie: Yes.

Mr. Nadelhaft: Okay. And how did Mr. Depp show you that?

Debbie: It was his own free will that he hired us to be with him.

Mr. Nadelhaft: And then did Mr. Depp have any relapses with drugs when you were working with him?

Debbie: I don't recall.

Mr. Nadelhaft: Do you recall Mr. Depp, in working with him, ever take cocaine? Not that you'd necessarily saw him, but that you understood that he had took cocaine.

Debbie: I never saw Mr. Depp use cocaine.

Mr. Nadelhaft: Did you have any understanding that Mr. Depp took cocaine, whether you saw it or not?

Debbie: I don't recall.

Mr. Nadelhaft: Did you administer drug tests to Mr. Depp?

Debbie: In the beginning.

Mr. Nadelhaft: Did you see the results of the drug tests?

Debbie: Yes.

Mr. Nadelhaft: Did you see Mr. Depp being positive for taking cocaine?

Debbie: I don't recall.

Mr. Nadelhaft: Do you recall accompanying Mr. Depp to Australia?

Debbie: Yes.

Mr. Nadelhaft: Okay. And do you recall accompanying Mr. Depp to Australia in around March of 2015?

Debbie: I don't remember dates.

Mr. Nadelhaft: Do you recall accompanying Mr. Depp to Australia when he was filming "Pirates of the Caribbean 5"?

Debbie: I do.

Mr. Nadelhaft: Okay. Where were you staying in Australia in relation to Mr. Depp?

Debbie: Distance-wise?

Mr. Nadelhaft: Yeah. How far away were you from him?

Debbie: About 30 minutes.

Mr. Nadelhaft: Okay. And where was Mr. Depp staying?

Debbie: In a rental house.

Mr. Nadelhaft: And where were you staying?

Debbie: In an apartment.

Mr. Nadelhaft: And what city were you in?

Debbie: I don't recall the name.

Mr. Nadelhaft: Okay. And was Dr. Kipper there with you?

Debbie: He came and went.

Mr. Nadelhaft: Did you fly to Australia with Mr. Depp?

Debbie: Sometimes I did, and other times I flew on a commercial.

Mr. Nadelhaft: Do you recall talking to Dr. Blaustein about Mr. Depp in Australia?

Debbie: I do not.

Mr. Nadelhaft: Do you recall Mr. Depp not doing very well while he was in Australia [inaudible 01:49:20] March 1st, 2015?

Debbie: I don't recall anything around that time.

Mr. Nadelhaft: Do you have an understanding as to what Mr. Depp was doing with Marilyn Manson?

Debbie: I do not.

Mr. Nadelhaft: Did you ever tell Dr. Kipper that Mr. Depp was doing what he wants with Marilyn Manson?

Debbie: I don't recall.

Mr. Nadelhaft: Do you recall Marilyn Manson being in Australia with Mr. Depp?

Debbie: I do not.

Mr. Nadelhaft: It says, "Debbie is worried and somewhat exhausted." Do you recall being exhausted while in Australia and working with Mr. Depp?

Debbie: I do not.

Mr. Nadelhaft: Do you have any reason to believe that what Dr. Kipper wrote is not true?

Debbie: I do not.

Mr. Nadelhaft: Okay. We can take this down. And go back to Exhibit 1. And if we could go to Kipper 157. Do you see 3715?

Debbie: I do.

Mr. Nadelhaft: Okay. Before I ask, do you recall how long you were in Australia with Mr. Depp?

Debbie: No, however long the filming of Pirates was.

Mr. Nadelhaft: Okay. And at 03/07/15 at 11:30, you wrote, "MD received a text message from client that he'd 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." You wrote that?

Debbie: According to my notes, yes.

Mr. Nadelhaft: Is there any reason to believe you didn't write that note?

Debbie: No.

Mr. Nadelhaft: Okay. Do you recall Dr. Kipper receiving a text message from Mr. Depp about Mr. Depp cutting his finger?

Debbie: I don't. I don't. Just what this note says.

Mr. Nadelhaft: Okay. Do you recall going to Mr. Depp's house after learning that he had cut his finger?

Debbie: Yes.

Mr. Nadelhaft: What do you recall about that?

Debbie: That we went to the house, and he...actually, I don't even think I went in at first. Dr. Kipper went in, and he had cut his finger, and we took him to the emergency room. Or his finger had been cut.

Mr. Nadelhaft: Do you recall what the house looked like when you went in?

Debbie: Yes.

Mr. Nadelhaft: What did the house look like?

Debbie: It was a mess.

Mr. Nadelhaft: Can you describe how it was a mess?

Debbie: I don't remember details, but I remember there was some writing on the wall, and I remember a smashed TV.

Mr. Nadelhaft: Do you remember what any of the writing said on the wall?

Debbie: I do not.

Mr. Nadelhaft: And you said you recalled a smashed TV?

Debbie: Yes.

Mr. Nadelhaft: Okay. Do you recall...was Amber in the house?

Debbie: I don't recall.

Mr. Nadelhaft: Do you recall seeing Amber that day?

Debbie: No, I don't recall.

Mr. Nadelhaft: Do you recall what rooms you went through of the house?
Mr. Depp's house.

Debbie: I remember looking for his finger in the downstairs area.

Mr. Nadelhaft: And what was in the downstairs area? What rooms were in the downstairs area?

Debbie: It was like a pool table, entertainment room.

Mr. Nadelhaft: Did you look anywhere else, like around the house?

Debbie: I don't recall.

Mr. Nadelhaft: What was the pool table, entertainment room...was that a mess?

Debbie: I don't recall.

Mr. Nadelhaft: Do you recall going into the kitchen of the house?

Debbie: I don't recall.

Mr. Nadelhaft: Do you recall finding Mr. Depp's finger?

Debbie: I did not.

Mr. Nadelhaft: Do you know who found Mr. Depp's finger?

Debbie: Yes.

Mr. Nadelhaft: Who?

Debbie: Ben.

Mr. Nadelhaft: Ben who?

Debbie: I don't remember his last name.

Mr. Nadelhaft: Who is Ben in relation to Mr. Depp?

Debbie: He's like their house manager.

Mr. Nadelhaft: Do you recall where the finger was found?

Debbie: I do not.

Mr. Nadelhaft: Do you recall if Mr. Depp appeared to have dirt, grime, and paint on his hands?

Debbie: Yes, he did.

Mr. Nadelhaft: Do you recall seeing any glass anywhere?

Debbie: I do not.

Mr. Nadelhaft: Do you recall smelling any alcohol?

Debbie: I do not.

Mr. Nadelhaft: Who else was with you when you went to the hospital?

Debbie: Malcolm and Stephen.

Mr. Nadelhaft: And who are Malcolm and Stephen?

Debbie: Stephen was his assistant, and Malcolm was one of his security guards.

Mr. Nadelhaft: Do you recall who was holding the piece of finger that had been cut?

Debbie: Ben brought it to the ER.

Mr. Nadelhaft: What did Ben bring the finger in?

Debbie: I don't recall.

Mr. Nadelhaft: Was it on ice, the finger?

Debbie: I don't recall.

Mr. Nadelhaft: Did you ask Mr. Depp how he cut his finger?

Debbie: I don't recall if I asked him.

Mr. Nadelhaft: Did you ask anyone how Mr. Depp had cut his finger?

Debbie: I don't recall.

Mr. Nadelhaft: Do you have any understanding as to how Mr. Depp cut his finger?

Debbie: I heard different stories from people.

Mr. Nadelhaft: What were the different stories you heard?

Debbie: I had heard that Amber threw a bottle of vodka at him. I had heard that he slammed it with a phone.

Mr. Nadelhaft: Do you recall who you heard that Amber had thrown a bottle at him?

Debbie: I do not.

Mr. Nadelhaft: Do you recall who you heard that he slammed it on the phone?

Debbie: I do not.

Mr. Nadelhaft: The stories that you had heard, did you hear it on that day of March 7th, or March 8th, 2015, or later?

Debbie: I don't remember.

Mr. Nadelhaft: Okay. Did you ever talk with Mr. Depp about how he cut his finger?

Debbie: I don't recall the conversations.

Mr. Nadelhaft: Okay. Did you ever talk with Dr. Kipper about how Mr. Depp cut his finger?

Debbie: I don't recall specific conversations.

Mr. Nadelhaft: How long was Mr. Depp in the hospital for?

Debbie: I don't remember.

Mr. Nadelhaft: Did you have any concerns about the supervision of Mr. Depp?

Debbie: I know, at times, we would go days without me seeing him. But I don't know specifically what this is regarding.

Mr. Nadelhaft: Were there issues with the nurse supervision while in Australia?

Debbie: I don't recall specifics.

Mr. Nadelhaft: You have no recollection of Dr. Kipper withdrawing his care of Mr. Depp for any period of time?

Debbie: No. I know at times it was discussed, when he would miss appointments, but I don't recall him ever actually going through with withdrawing his care.

Mr. Nadelhaft: Did you recall there being concerns about Mr. Depp taking substances that he shouldn't have been taking?

Debbie: I don't recall what that was regarding.

Mr. Nadelhaft: Do you recall having major concerns about leaving for Australia with Mr. Depp?

Debbie: I do not.

Mr. Nadelhaft: While that's going up, Ms. Lloyd, the day that Mr. Depp cut his finger, you don't recall seeing Amber one way or the other? Is that right?

Debbie: I do not.

Mr. Nadelhaft: Exhibit 16 is Lloyd 140 through 145. And Mr. Depp responded, "It's sad. I love you so much, little Debbie. And of course Kipper too. He was right, though I did feel a bit of a sting when his letter paper trail arrived on the off chance that I croak, which I also understand. Just never heard of anyone being fired by their physician before, so I'm kinda proud of that little fact too. I love you, kid. Even

attempting saying thank you to you would be like a monkey trying to fuck a football. It's just simply impossible. I wish things could have ended on a better note. All my love, Nurse Shark, J.D." Do you recall receiving this text from Mr. Depp?

Debbie: I don't.

Mr. Nadelhaft: This text was on your phone, correct?

Debbie: Correct.

Mr. Nadelhaft: Okay. Would Mr. Depp call you "Nurse Shark"?

Debbie: Yes.

Mr. Nadelhaft: Would Mr. Depp call you "little Debbie"?

Debbie: Yes.

Mr. Nadelhaft: And you don't recall Mr. Depp saying, "Never heard of anyone being fired by their physician before"?

Debbie: I do not.

Mr. Nadelhaft: And then you respond on the next page, "I love you too, and hope this is not the end. Be safe and be smart, my son." You sent that text to Mr. Depp?

Debbie: According to this, yes.

Mr. Nadelhaft: Okay. And do you know what you meant by "Be safe and be smart"?

Debbie: I don't know.

Mr. Nadelhaft: And then Mr. Depp wrote, "I've been off of for three days. The doc jumped the gun. Also, please thank him for the Motrin and the baclofen. They work a treat for amputated fingers. Goddamn, I love that weird fucker, no matter what." You received that text from Mr. Depp?

Debbie: According to this.

Mr. Nadelhaft: Do you understand what is meant by "I have been off of for three days"?

Debbie: I have no idea.

Mr. Nadelhaft: Okay. You respond, "So glad to hear you have been off. No matter what, I just want you to feel better."

Debbie: Yeah, I don't know what we were referring to.

Mr. Nadelhaft: Let me go down to the next page. You write, "I'd be more than happy to come back and help you with pain management and paradol injections. I know Kipper loves you and would always wanna continue your care if you're no longer using." You wrote that to Mr. Depp?

Debbie: According to this.

Mr. Nadelhaft: And this text was on your phone, correct?

Debbie: Correct.

Mr. Nadelhaft: What did you mean by, "Kipper loves you and would always wanna continue your care if you're no longer using"?

Debbie: I don't know. Just what it says. I don't [inaudible 02:01:37].

Mr. Nadelhaft: No longer using...

Debbie: I don't know what that was regarding.

Mr. Nadelhaft: You don't know what "no longer using" is referring to?

Debbie: I do not.

Mr. Nadelhaft: And then Mr. Depp wrote, "I don't know. I'm gonna stop it all except whatever I was on before, and just deal with it." You received that text from Mr. Depp?

Debbie: Yes.

Mr. Nadelhaft: Do you know what he was referring to where he said, "I'm gonna stop it all except whatever I was on before, and just deal with it"?

Debbie: I do not know what that's regarding.

Mr. Nadelhaft: Okay. And then you wrote, "I respect whatever decisions you'll make. I'll be sad to leave the crew, as I love you all. I hope to always be in touch, even if you choose not to continue a working relationship. Miss you already. I will get in touch with Kevin and get my stuff out. [inaudible 02:02:28] soon. Hugs." You wrote that message to Mr. Depp?

Debbie: According to this.

Mr. Nadelhaft: Okay. And then Mr. Depp wrote, "Take care, darling. I cannot ever thank you enough all you've done for me on the junkie side

and the broken heart side. You've been a life saver, literally. We'll be seeing each other again, sweetheart. Love you so much, little Debbie, and so does my entire crew. X." You received that text message from Mr. Depp?

Debbie: According to this, yes. I'm gonna cry. [inaudible 02:03:57].

Mr. Nadelhaft: Ms. Lloyd, I'm showing you what's been marked as Exhibit Lloyd 17, which is Lloyd 158 through 160, which is a text message between you and Johnny Depp from your phone. You see that?

Debbie: Yes.

Mr. Nadelhaft: Okay. And on March 27th, 2015, you wrote, "Good morning, sleepyhead. Erin came by to give you a shot. You were still sleeping. Take [inaudible 02:03:27] to hold you over, and I will check in with you when I'm done with my appointment in Beverly Hills." Then you wrote, "Have you taken pill? If not, hold off and Erin is on her way to give you injection." Do you see that?

Debbie: Yes.

Mr. Nadelhaft: Okay. And you wrote that text message, correct? Wrote those messages?

Debbie: Yes.

Mr. Nadelhaft: Okay. And then on the next page, Mr. Depp wrote, "The fuckin' pain is as bad as when it was cut off. Horrific." You received that message from Mr. Depp?

Debbie: Yes.

Mr. Nadelhaft: And he's talking about his finger there, correct?

Debbie: Yes.

Mr. Nadelhaft: And you received that text message from Amber, correct?

Debbie: Correct.

Mr. Nadelhaft: All right. And then you wrote, "He's at the studio with Marcus and is supposed to call me when he gets back to the lofts. I will drive up there if you want me to. Always feel weird showing up unexpected. You want me to go?" You wrote that text message to Amber?

Debbie: Yeah, I don't recall, but according to this, yes.

Mr. Nadelhaft: Do you know who Marcus is? What was his relationship to Mr. Depp?

Debbie: Friend.

Mr. Nadelhaft: Okay. And then you wrote, "I know Stephen is there. Let me just check in and see what I can find out. I'll get right back to you." Who is Stephen?

Debbie: His assistant.

Mr. Nadelhaft: All right. Do you ever remember checking if Mr. Depp had been taking cocaine?

Debbie: I don't remember specifically asking any questions related to that.

Mr. Nadelhaft: Is there any reason to believe that you didn't do what you said in your text message?

Debbie: No.

Mr. Nadelhaft: Do you recall what you were giving Mr. Depp Valium for?

Debbie: I do not.

Mr. Nadelhaft: Ms. Lloyd, showing you again what's been marked as Exhibit 1, and I'm gonna point you to Kipper 167, which is from April 13th, 2015.

Debbie: Okay.

Mr. Nadelhaft: Okay, do you see the entry for 1500?

Debbie: Yes.

Mr. Nadelhaft: All right. You wrote, "Bandage changed and hand exercises done at appointment with surgeon's office. Per RN at surgeon's office and occupational therapist, hand is healing well, and finger has good range of motion. Exercises to be done three to five times per day. 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 have been from him using drugs and alcohol. Patient states he will no longer sneak use and wants to enjoy clarity." You wrote that?

Debbie: Yes.

Mr. Nadelhaft: Okay. And these are part of your nurse's notes?

Debbie: Yes.

Mr. Nadelhaft: Okay. And Mr. Depp told that he felt the majority of his issues with his wife had been from him using drugs and alcohol?

Debbie: According to the note, yes.

Mr. Nadelhaft: And Mr. Depp wrote he will no longer sneak use and wants to enjoy clarity.

Debbie: According to the document, yes.

Mr. Nadelhaft: What is being referred to as "no longer sneak use"?

Debbie: I only know what's stated in my notes.

Mr. Nadelhaft: Okay. Would it be anything other than drugs or alcohol?

Debbie: I don't recall.

Mr. Nadelhaft: Was there anything that Mr. Depp was sneaking other than drugs and alcohol that you were concerned about?

Debbie: I don't recall.

Mr. Nadelhaft: If we go to 175, Kipper 175 on this page, on this document, it's notes for June 28th, 2015.

Debbie: June... Okay.

Mr. Nadelhaft: It says, "At 1700, RN received initial results from brain MRI. No obvious abnormalities noted. Final report will be done tomorrow. Patient informed of results." Do you recall why Mr. Depp received a brain MRI?

Debbie: He was having chronic headaches.

Mr. Nadelhaft: And then do you see at 6:30 at 1300?

Debbie: Yes.

Mr. Nadelhaft: Okay. And that's highlighted?

Debbie: Yeah.

Mr. Nadelhaft: Okay. You wrote, "RN arrived on set to visit patient. He was upset due to having an argument with his wife. Patient stated he had taken about four Xanax, 1 milligram over the past 24 hours to deal with the stress he was feeling. Patient was able to express his emotions

appropriately. Patient stated that he had not slept the night before due to argument with his wife." That's a note you wrote?

Debbie: Correct.

Mr. Nadelhaft: Okay. And that's based off of information provided to you by Mr. Depp?

Debbie: I don't recall.

Mr. Nadelhaft: Well, we're...

Debbie: According to my note, yes.

Mr. Nadelhaft: So Mr. Depp told you he'd taken about four Xanax, 1 milligram over the past 24 hours, correct?

Debbie: [inaudible 02:09:24] my notes, yes.

Mr. Nadelhaft: Okay. And then at 1920 on June 30th, it said, "Patient had another argument with his wife. Patient was anxious and was asking for medication to help calm him down. Seroquel, 50 milligrams administered." Do you see that?

Debbie: Yes.

Mr. Nadelhaft: And that's a note you wrote?

Debbie: Yes.

Mr. Nadelhaft: Do you know why your nursing notes ended on July 1st, 2015?

Debbie: I do not.

Mr. Nadelhaft: Did you continue to care for Mr. Depp as his nurse after July 1st, 2015?

Debbie: I do not recall my last date.

Mr. Nadelhaft: Okay. Did you prepare nursing notes through the time that you were Mr. Depp's nurse?

Debbie: I did.

Mr. Nadelhaft: Okay. And did you provide those notes to Dr. Kipper?

Debbie: I did.

Mr. Nadelhaft: The slide I'm showing you has been marked as Exhibit Lloyd 19. This is an email from Dr. David Kulber on June 27th, 2015 that you were copied on. Do you see that?

Debbie: Yes.

Mr. Nadelhaft: And do you know who Dr. Kulber is?

Debbie: I don't recall exactly who he was.

Mr. Nadelhaft: Did you understand that Mr. Depp went to a specialist for his finger?

Debbie: Yes.

Mr. Nadelhaft: Okay. And you're copied on this email?

Debbie: I see my name copied on the email, yes.

Mr. Nadelhaft: Okay. And you recall that Mr. Depp was treated for a bad crush injury for his finger?

Debbie: I recall him being treated for a finger injury. This is the first I remember hearing it was a crush injury.

Mr. Nadelhaft: And that's the email you received from Dr. Kulber, correct?

Debbie: I'm seeing this today. I don't recall receiving this email.

Mr. Nadelhaft: Is there any reason you believe you didn't receive this email?

Debbie: No. I just don't recall.

Mr. Nadelhaft: Ms. Lloyd, I'm showing you what's been marked as Exhibit 20, which is a text message chain between you and Mr. Depp from your phone. You see that?

Debbie: I see that.

Mr. Nadelhaft: On July 5th, 2015, Mr. Depp wrote to you, "Canceling the squeezing and needles tonight. Need to get the recluse out of his cage and his brain." You received that text message from Mr. Depp?

Debbie: Yes.

Mr. Nadelhaft: Okay. And then you said, "How come you're canceling? You okay? Not sure what you mean by the rest of your text. Please let

me know if you need anything. I'm here if you wanna chat or want me to go hang at the house with you." You wrote that text to Mr. Depp?

Debbie: Yes.

Mr. Nadelhaft: And then Mr. Depp wrote to you, "I'm in a very anxious and painfully confused state. Rather not get into details, but in a nutshell, problems with family, my company, the ex, business manager, and my fuckin' jumbled brain will need refilled with meds tomorrow. Thanks, Honey. X." You received that text from Mr. Depp?

Debbie: According to this, yes.

Mr. Nadelhaft: Okay. And Mr. Depp talked about how he was having problems with his family?

Debbie: That's what this states.

Mr. Nadelhaft: And Mr. Depp was having problems with his company?

Debbie: That's what this states.

Mr. Nadelhaft: And Mr. Depp was having problems with the ex?

Debbie: That's what this states.

Mr. Nadelhaft: And Mr. Depp was having problems with his business manager?

Debbie: According to this text.

Mr. Nadelhaft: And Mr. Depp was having trouble with his "fuckin' jumbled brain," correct?

Debbie: According to this text.

Mr. Nadelhaft: And just going back to Exhibit 1 for a moment. Then we can go back to Kipper 167. And Ms. Lloyd, I'd ask you to look at the entries for April 14th. It's at the bottom.

Debbie: Okay.

Mr. Nadelhaft: You wrote at 1400, "RN and MD arrived at patient's home to have meeting, set treatment plan and boundaries while traveling in Australia." You wrote that?

Debbie: Correct.

Mr. Nadelhaft: And the RN is you, correct?

Debbie: Yes.

Mr. Nadelhaft: And the MD is Dr. Kipper, correct?

Debbie: Correct.

Mr. Nadelhaft: And do you recall what the treatment plans and boundaries were while traveling in Australia, as of April 2015?

Debbie: I do not recall.

Mr. Nadelhaft: And then if we go to the next page. You see the April 15th entries?

Debbie: Yes.

Mr. Nadelhaft: Okay. And at 12:15, you write, "Arrived at patient's home. Assistant was in hallway and informed RN that patient was in a bad mood and told assistant he did not need anything from him today. RN was let in home by security, and knocked on patient's door to let him know she was there. Patient screamed, 'What?' RN informed patient she was letting him know she was there and would be downstairs. About five minutes later, security came in the house and informed RN that patient has told security to get everyone out of his home, and he did not want anymore unexpected guests. RN left property and informed MD of the events. Per MD, drop tomorrow's meds off with security, and do not reach out to patient again. Wait for patient to reach out to medical team." You wrote that note?

Debbie: Correct.

Mr. Nadelhaft: And this document and this note also talks about you informing Dr. Kipper about what happened in this note, correct?

Debbie: Yes.

Mr. Nadelhaft: Ms. Lloyd, I'm showing what's been marked as Lloyd 21. You see at April 15th, at the bottom, there's a text from Mr. Depp?

Debbie: Yes.

Mr. Nadelhaft: And he wrote, "Hey sweetheart, I'm so sorry about today. I thought you were Stephen, whom I'm not particularly enthused about for his loss of loyalty and his loss of memory. He has tried everything to fuck me over as far as traveling with my wife. He also bursts into my fucking house like it's goddamned Grand Central Station. I'm truly sorry if I upset you. If you like, you can give me some morphine to see if my

tongue and penis touch. All my love, J." Did you receive this text from Mr. Depp?

Debbie: I might appear so. I don't...yes.

Mr. Nadelhaft: Okay. Do you have any understanding as to what Mr. Depp was referring to where he says, "Stephen tried everything to fuck me over as far as traveling with my wife"?

Debbie: I [inaudible 02:16:50].

Woman: First of all, going back to your work for Dr. Kipper, you said...I think you testified earlier you cared for multiple patients that were of Dr. Kipper's, correct?

Debbie: Correct.

Woman: And when you would care for Dr. Kipper's patients, how would you report their status to Dr. Kipper?

Man: [inaudible 02:17:16]

Debbie: Multiple different resources, phones, text, verbal...verbal and written.

Woman: And how often would you report to Dr. Kipper about his patients?

Debbie: It responded...I mean, it depended on different patients. Varied.

Woman: And I believe you testified earlier that you maintained nursing notes for those patients, correct?

Debbie: Correct.

Woman: What type of information did you maintain in these notes?

Debbie: Mainly, we provide...care given and patients' responses to care given or any external factors that could affect the patient.

Woman: Is there any information that you would not include in your notes?

Debbie: Not...

Woman: I'm sorry, I didn't catch your answer.

Debbie: Not specifically.

Woman: Other than Dr. Kipper, does anyone else review your notes?

Debbie: If another nurse was to work on the case, they could have access to the notes.

Woman: And does Dr. Kipper advise you on any information that should be maintained in your notes?

Debbie: Not directly.

Woman: Has he ever told you that certain information should not be included in your notes?

Debbie: No.

Woman: When did you become a registered nurse?

Debbie: 2004.

Woman: And have you been employed as a registered nurse from that time up until you became a nurse practitioner?

Debbie: Yes.

Woman: In your time as a registered nurse, have you ever had a patient that you suspected was the victim of domestic abuse?

Debbie: No.

Woman: Do you have any professional responsibility to report domestic abuse?

Debbie: Yes.

Woman: And what is that responsibility?

Debbie: I'm a mandated reporter for child/elder abuse and any suspected injuries.

Woman: How would you define suspected injuries?

Debbie: If I was to work in a facility and somebody came in and reported, or I felt that it was a result from an injury caused by somebody else.

Woman: Who do you report the abuse to, in that instance?

Debbie: I've never had to report abuse.

Woman: Okay. But given your professional responsibility, do you know who you would report that to, in that event?

Debbie: I do not.

Woman: In your time as a registered nurse, have you ever witnessed physical violence by one of your patients?

Debbie: I do not recall ever witnessing any violence.

Woman: And when you say "any violence," does that mean perpetrated by your patient or against your patient, or just...

Debbie: Just in general violence.

Woman: So you met Mr. Depp either on June 11th or June 12th of 2014?

Debbie: According to my notes, yes.

Woman: Okay. And had you ever spoken with him before that date?

Debbie: No.

Woman: When did you first meet Ms. Heard?

Debbie: I don't recall.

Woman: Do you recall when you first met her...not specifically when, but do you recall the instance when you first met her?

Debbie: I do not.

Woman: When you first met Ms. Heard, did you have an understanding as to what her relationship to Mr. Depp was at that time?

Debbie: Yes.

Woman: And what was that understanding?

Debbie: That they were in a relationship.

Woman: Were they engaged when you first met them?

Debbie: I don't recall the dates they got engaged.

Woman: Were they married when you first met them?

Debbie: No.

Woman: Did you attend their wedding?

Debbie: Yes.

Woman: And where was that?

Debbie: On the island, in the Bahamas.

Woman: Can we take this down and please pull up what I've marked as Document B?

[02:22:13]

[silence]

[02:22:31]

Woman: Clip 23.

Woman: Now, just for the record, I believe these are the nursing notes you were looking at earlier. This just has a different production number, and I just thought it might go more smoothly if I am calling out the correct page number. So, just to establish this, do you recognize this document here?

Debbie: Yes.

Woman: And these are your nursing notes I believe you looked at with Mr. Nadelhaft earlier, correct?

Debbie: Correct.

Woman: Okay. I'd like to direct your attention to the entry for June 17th of 2014, which is on the page with...perfect. There it is. This is a note you prepared, correct?

Debbie: Correct.

Woman: And at the time that you prepared this note, were you in Boston with Mr. Depp?

Debbie: According to the note, yes.

Woman: Now, in the sub-section that says 2-23-30, do you see where it says, "Accompanied patient fiancé, assistants, and security to concert"?

Debbie: Yes.

Woman: Okay. And in this note, "patient" refers to Mr. Depp, is that right?

Debbie: Yes.

Woman: And fiancé is Ms. Heard?

Debbie: Yes.

Woman: Does this refresh your recollection that Mr. Depp and Ms. Heard were engaged in June of 2014?

Debbie: According to this, yes.

Woman: Is this the first time you met Ms. Heard?

Debbie: I don't recall when I met her.

Woman: Further down in the note, do you see where it says, "Assistant was also asked to pass on RN and MD's numbers to fiancé, as we would both like to speak with her and to obtain her input towards patient treatment." Do you see where I'm referring to?

Debbie: Yep.

Woman: Okay. "RN" is referring to you in this instance?

Debbie: Correct.

Woman: And "MD" refers to Dr. Kipper?

Debbie: Correct.

Woman: All right. Do you recall why he wanted to speak with Ms. Heard at this time?

Debbie: I do not.

Woman: Do you recall Ms. Heard expressing interest in participating in Mr. Depp's treatment?

Debbie: I don't remember the events other than what's stated in my notes.

Woman: Your phone number was given to Ms. Heard, though, correct?

Debbie: Correct.

Woman: Exhibit 24.

Woman: Ms. Lloyd, do you recognize this document?

Debbie: No.

Woman: So, I take it you did not prepare this document, is that correct?

Debbie: Correct.

Woman: Directing your attention to the bottom of the...

Judge Azcarate: Ladies and gentlemen, this is probably a good break to go ahead and have our lunch break. So we'll go ahead and break until 2:00. Do not discuss the case with anybody, and don't do any outside research, okay? We'll come back and continue this deposition. All right. So we'll return at 2:00 p.m.? Correct?

Man: [inaudible 02:46:46]

Judge Azcarate: All right. Okay, thank you.

Man: All rise.

Judge Azcarate: Could we get 25?

[02:26:55]

[silence]

[02:27:18]

Judge Azcarate: That's fine. Don't need the microphone [inaudible 02:27:26]. Yeah. Sir, you can have a seat. That's fine. Microphone. Maybe if you could just talk real loud for me. Hold on just a minute. I really can't hear you.

Man: I have a hernia problem. That's why I start [inaudible 02:28:03].

Judge Azcarate: Okay. Oh, you have a problem with a hernia?

Man: Yes.

Judge Azcarate: Okay. And it's really bothering you to the point where you can't concentrate?

Man: Yeah. Today is...I don't know why it bother me too much [inaudible 02:28:14].

Judge Azcarate: I know, but I wanna make sure you understand, if I excuse you today, I'm excusing you from the jury.

Man: I'm try to go today home and take medicine and [inaudible 02:28:23] ready for tomorrow.

Judge Azcarate: Okay, I can't do that. I can't have that done. We have to keep going. So, I mean, has it been bothering you other days while you've been on the jury?

Man: No. Today, it start now. Never it bother more than one...for week I'm here.

Judge Azcarate: Okay, but it might bother also tomorrow?

Man: I'm not sure, but I'll try to do my best to...

Judge Azcarate: I know you're trying to do your best, but I wanna make sure you're healthy too. I don't want you to ruin your health for this. All right, just sit there for a second. If I can have the attorneys. Sir, do you...do you have any... All right. Sir, we just wanna make sure you're healthy and everything, so we're gonna excuse you from this jury, okay? All right. Just take care of yourself, okay?

Man: [inaudible 02:29:01]

Judge Azcarate: All right, thank you.

Man: [inaudible 02:29:04]

Judge Azcarate: All right, you can go back. Thank you. We'll talk later. All right. Yes, ma'am, do you have something before the jury comes in?

Woman: [inaudible 02:29:31]

Judge Azcarate: Okay, which one?

Woman: 548 [crosstalk 02:29:35].

Judge Azcarate: 548?

Woman: [inaudible 02:29:36]

Judge Azcarate: Perfect. Okay.

Woman: [inaudible 02:29:38]

Judge Azcarate: All right.

Woman: [inaudible 02:29:39]

Judge Azcarate: Okay, 548 is done. All right. I did have one question. There seems to be a few... That's okay, you can stay there. We don't have the jury here [inaudible 02:29:50]. There seems to be a few exhibits I just wanna make sure of. We have everything that you just gave us earlier from Dr. Kipper's deposition, but I just wanna make sure if there were redactions needed for 395 or 414, or am I using mine for that?

Mr. Nadelhaft: [inaudible 02:30:13]

Judge Azcarate: I just wanna see... I mean, I can just give you the numbers of the ones I'm not sure about, and you can look at it, and we

can move on. 405, 455, 304, 307, 395, and 414. I'm just not sure if I'm waiting for redactions or if I'm using the ones I'm gonna use. And then you had one that...I'm not sure if you said 1083 or 283. So if you could let me know. I heard 1083 as the exhibit number. Jamie heard 283. So I just wanna make sure we get the right one.

Mr. Nadelhaft: [inaudible 02:30:56]

Judge Azcarate: That was with Dr. Kipper's... You said 1063, then you said either 1083 or 283, and I'm not sure which.

Mr. Nadelhaft: [inaudible 02:31:07]

Judge Azcarate: You can get back to me on it, Mr. Nadelhaft. I don't wanna catch you off guard.

Mr. Nadelhaft: [inaudible 02:31:12]. You have the redacted versions of 304, 455, 405...

Judge Azcarate: Oh, there you go.

Mr. Nadelhaft: ...and I think it's probably 283. I have 283.

Judge Azcarate: 283?

Mr. Nadelhaft: Yeah.

Judge Azcarate: Jamie's always right. That's good. Good to know. Okay. All right, if you wanna hand those up, that would be fantastic. All right. Is there anything else before the jury comes? Yes, ma'am.

Woman: Your Honor, just for the record, plaintiff's Exhibit 47, plaintiff's Exhibit 48, and plaintiff's Exhibit 41 were also used and offered during Dr. Kipper's deposition. I believe I passed the redacted versions of those up to you.

Judge Azcarate: Yes, we have all of those.

Woman: Okay.

Judge Azcarate: Thank you.

Man: [inaudible 02:32:00]

Judge Azcarate: I think that should be everything. If not, we'll get back to it. Thank you.

Woman: I know where to find you. All right.

Judge Azcarate: Okay, are we ready for the jury, then? All right, thank you. Thank you, ladies and gentlemen. Just to let you know, juror 25 was experiencing some health issues, and obviously, your health is a top priority for us, so I went ahead and excused him for the jury, and that's why we have alternates. So, okay? All right? All right, thank you. All right, we can continue...with Ms. Lloyd's testimony.

Woman: "...[inaudible 02:32:39] this protracted therapy will include 12-step private counseling and personal psychotherapy and couples therapy with his fiancé, Amber. Both are in agreement to this plan." Do you see where I'm referring?

Debbie: Yes.

Woman: Do you recall that couple's therapy was a component of Mr. Depp's treatment?

Debbie: I don't recall what was...that's between him and the doctor.

Woman: Do you recall Mr. Depp and Ms. Heard attending couple's therapy together?

Debbie: Yes.

Woman: If we could turn to the next page here. And then at the top, it says, "I met with Amber for 90 minutes and discussed the above and her concerns that he be strictly monitored and supervised. Do you recall Dr. Kipper meeting with Amber early on in Mr. Depp's treatment?"

Debbie: I do not.

Woman: If we could bring back up Document B, which is now marked as Exhibit 22, is that correct?

Man: 23.

Woman: 23? Okay. Can we please go to the entry for June 24th, 2014, which is on Depp 1661. Okay. Now, with respect to the entry for June 24th, 2014, this is an entry you prepared, correct?

Debbie: Correct.

Woman: And the first line says, "RN [inaudible 02:34:52] met with patient's fiancé to inform her of treatment plan for patient." Do you see that?

Debbie: I do.

Woman: Does this refresh your recollection that you attended a meeting with Dr. Kipper and Ms. Heard concerning Mr. Depp's treatment?

Debbie: I don't recall the meeting.

Woman: Do you have any reason to doubt that this meeting occurred?

Debbie: No.

Woman: Other than what's reflected in this note, do you have any other independent recollection of any such meeting with Dr. Kipper and Ms. Heard?

Debbie: I do not.

Woman: Okay. If I could direct your attention just to the last line of the note. It says here, "She was encouraged to call RN or MD with any questions or concerns that might arise." Do you see that?

Debbie: I do.

Woman: Throughout your treatment of Mr. Depp, did Ms. Heard reach out to you with questions and concerns?

Debbie: Yes.

Woman: She had your phone number, correct?

Debbie: Yes.

Woman: And I think we saw some text messages that Mr. Nadelhaft was asking questions where Ms. Heard was reaching out to you, correct?

Debbie: Correct.

Woman: When Mr. Depp became your patient, did Ms. Heard ever show you any pictures of Mr. Depp?

Debbie: I don't recall.

Woman: Do you recall Ms. Heard showing you any pictures of cocaine?

Debbie: I don't recall.

Woman: Do you recall Ms. Heard ever showing you any audio recordings of Mr. Depp?

Debbie: I don't recall.

Woman: Okay, I'd like to move on to Mr. Depp's detox, and that was on his private island, correct?

Debbie: Correct.

Woman: And you traveled down to the island with Mr. Depp, is that right?

Debbie: I don't recall. It should be in my notes.

Woman: We can look at those in a moment. But you were on the island with Mr. Depp for the majority of his detox, correct?

Debbie: Yes.

Woman: Okay. And when you were on the island, did you see where Mr. Depp was staying?

Debbie: Yes.

Woman: And was Ms. Heard staying with him in that location as well?

Debbie: Yes.

Woman: And what did their accommodations look like?

Debbie: Can you be more specific?

Woman: What type of structure were they staying in?

Debbie: It was a house.

Woman: Could we pull up Document E, which is a short video?

Woman: Please stand by.

Woman: And for the record, this was produced as Depp 9811.

[02:38:14]

[silence]

[02:38:38]

Woman: Hearing Exhibit 25. Let me know whenever you need me to play, counsel.

Woman: Please play, thank you.

[00:38:49]

[silence]

[00:39:15]

Woman: Ms. Lloyd, do you recognize the location reflected in that video?

Debbie: Yes.

Woman: And what is it?

Debbie: It's Johnny's home on his island.

Woman: And is that where he was staying during the detox process?

Debbie: Yes.

Woman: Is that video consistent with how the house looked in August of 2014?

Debbie: Yes.

Woman: Okay. Is there any part of the house that's not reflected in that video?

Debbie: The bathroom wasn't in the video.

Woman: When you were on the island, you were personally overseeing Mr. Depp's detox process, correct?

Debbie: Correct.

Woman: And how often would you see him in person during that...?

Man: [inaudible 02:40:01] answer.

Debbie: It varied.

Woman: Did you see him in person at least once a day?

Debbie: I cannot recall.

Woman: When Dr. Kipper arrived, do you recall how often he would see Mr. Depp?

Debbie: I do not.

Woman: What substances was Mr. Depp... Excuse me. What substances was Mr. Depp detoxing from?

Debbie: Opiates.

Woman: Was he detoxing from any other substances?

Debbie: I don't recall.

Woman: Have you overseen other patients detoxing from opiates before you were caring for Mr. Depp?

Debbie: Yes.

Woman: How many would you estimate?

Debbie: Hundreds.

Woman: What does that process do to the person physically?

Debbie: They go through withdrawal symptoms, and we medicate them.

Woman: And what type of withdrawal symptoms have you observed?

Debbie: Nausea, vomiting, body aches, [inaudible 02:41:27] erection, [inaudible 02:41:30], restlessness, anxiety.

Woman: Is there a time during the detox process when those symptoms are [inaudible 02:41:46] the most acute?

Debbie: Yes.

Woman: What stage in the process is that?

Debbie: Typically day three through five or six.

Woman: How would you describe Mr. Depp's physical state throughout the detox process?

Debbie: I don't recall specifics. I'd have to refer to my notes.

Woman: How would you describe Mr. Depp's psychological state throughout the detox process?

Debbie: I don't recall. I'd have to review my notes.

Woman: All right. Let's go back to your notes then, which I believe is Exhibit 23. [inaudible 02:42:30]. Could we first go to the entry dated August 8th, 2014? Ms. Lloyd, does this refresh your recollection as to when you arrived on the island to assist Mr. Depp in his detox process?

Debbie: According to my notes, it was August 8th.

Woman: Okay. And so, as I think we established earlier, you met Mr. Depp in June. Fair to say that you had known him for about two months at this time?

Debbie: Correct.

Woman: Okay. Can we please go to the entry for August 11th, 2014? Okay. And this is a note you prepared?

Debbie: Yes.

Woman: Okay. If you need to take a minute and read it over, just let me know when you're done [inaudible 02:43:49] I can go right into it.

Debbie: Okay.

Woman: Fair to say that this note reflects that Mr. Depp was experiencing discomfort on this date?

Debbie: According to my notes, yes.

Woman: It says he was experiencing muscles spasms, chills, and pains, right?

Debbie: Correct.

Woman: Did you personally observe Mr. Depp in this state?

Debbie: According to this note, it does not appear I did.

Woman: Okay. Are these symptoms typical during a detox process?

Debbie: Yes, they are.

Woman: Okay. Could we please go to the entry for August 12th, 2014? Okay. And I believe you looked at this earlier, but I'd just like to direct your attention to the last line in this first paragraph. "MD arriving this morning and will assess patient." Do you see that?

Debbie: Where are we on...what...?

Woman: So, directing your attention to the August 12th, 2014 entry.

Debbie: Yes, I see it. Sorry.

Woman: Oh, okay. And so, based on your note, it appears that Dr. Kipper arrived on the island on August 12th. Is that correct?

Debbie: Correct.

Woman: Okay. Was the plan always for Dr. Kipper to come down to the island to attend to Mr. Depp?

Debbie: I don't recall.

Woman: Do you recall any issues in your caring for Mr. Depp prior to Dr. Kipper's arrival?

Debbie: I don't...

Woman: Do you recall any medical issues arising with Mr. Depp before Dr. Kipper arrived that caused you concern?

Debbie: I don't recall.

Woman: If there had been a serious medical issue with Mr. Depp prior to Dr. Kipper's arrival, would that have been reflected in your notes?

Debbie: Yes.

Woman: If Mr. Depp's behavior had been unmanageable prior to Dr. Kipper's arrival, would that have been reflected in your notes?

Debbie: Yes.

Woman: Can we please go to the next entry for August 13th? And Ms. Lloyd, this is also a note that you prepared?

Debbie: Yes.

Woman: Okay. Now I'd like to direct your attention to the portion of the note that starts with 1340. Again, this is military time, is that right?

Debbie: Correct.

Woman: Okay. And I think you testified earlier, this is the time that you prepared the note, not the time of the events reflected in the note, is that right?

Debbie: Yes. I mean, I don't recall specifics, but sometimes they were at times, and sometimes they were done later.

Woman: So, generally speaking, when you prepare these nursing notes, how long after the events reflected in the note was the note actually prepared by you?

Debbie: It varied.

Woman: Okay. Okay, so directing your attention back to the portion that starts with 1340, do you see where it says, "Patient's fiancé texted to say he wasn't feeling well. MD ordered pheno 64.8 milligrams, Neurontin 600 milligrams, stat. Patient and fiancé informed that today and tomorrow will be the most difficult days and to keep in close contact with them." Do you see that?

Debbie: Yes.

Woman: Do you recall informing Mr. Depp and Ms. Heard that the following days would be the most difficult?

Debbie: Just what was stated in my notes.

Woman: Could we please go to the entry for August 17th, 2014? Do you see that?

Debbie: I do.

Woman: And this is a note you prepared?

Debbie: Correct.

Woman: Do you recall the specific event?

Debbie: I do not.

Woman: Do you have any reason to doubt that what is reflected in your note is accurate?

Debbie: No.

Woman: Okay. So when you wrote, "RN and MD found patient sitting quietly on his porch," do you believe that's an accurate recitation of how you found Mr. Depp on this date?

Debbie: Correct.

Woman: When you wrote that he was calm and stated he was frustrated, you have no reason to doubt the accuracy of that statement?

Debbie: Correct.

Woman: Could we please bring back up Exhibit 23, and specifically go to the August 18th, 2014 entry, which is on Depp 1677. Ms. Lloyd, I'd like to direct your attention to... Well, first of all, this is a note that you prepared, correct?

Debbie: Correct.

Woman: Okay. And I'd like to direct your attention to the end of the note, which is actually on the second page, or the next page. Do you see at the end here where it says, "Patient was escorted to bed." Do you see that?

Debbie: Yes.

Woman: Would that have been you who escorted Mr. Depp to bed?

Debbie: I don't recall.

Woman: You testified earlier, though, that you did see Mr. Depp in the home that he was staying in on the island, correct?

Debbie: Correct.

Woman: And it says, "Plan is to leave the island tomorrow." See that?

Debbie: I do.

Woman: And directing your attention to the next note, August 19th, do you see that it says, next to 2335, "Arrived back in LA"?

Debbie: Yes.

Woman: Okay. So does this accurately... Excuse me. Does this accurately reflect that you left the island on August 19th, 2014?

Debbie: According to these notes, yes.

Woman: Okay. I'd like to direct your attention to the August 20th, 2014 entry, which starts on the next page. And then if you go to the next page as well, you can see that there's another entry for August 20th, 2014. Do you see that?

Debbie: Oh yeah, yeah.

Woman: Okay. On this page here, I'd like to direct your attention to the portion that starts with 1230. Do you see that?

Debbie: Yes.

Woman: Now, it says here, "RN and MD spent time talking with patient." Do you see that?

Debbie: I do.

Woman: This would have been you and Dr. Kipper, correct?

Debbie: Correct.

Woman: And does this reflect that you spoke with Mr. Depp in person?

Debbie: I don't recall. Yes.

Woman: Okay. And the note goes on to say, "Patient expressed frustration with the detox process and was not liking how the phenobarb

was making him feel. Initially, he stated he was done with the process and no longer wanted MD and RN services. After processing his feelings and realizing how far he had come, and that part of his wanting to give up was due to tensions between him and his fiancé, patient's fiancé, RN, and MD came up with a plan for fiancé to take a few days for herself, and patient was willing to continue treatment but was going to refuse phenobarbital from this point forward." Do you see that?

Debbie: I do.

Woman: Okay. Did I read that correctly?

Debbie: Yes.

Woman: Do you recall tensions between Mr. Depp and Ms. Heard at this stage in his detox process?

Debbie: Yes.

Woman: And what do you recall about that?

Debbie: I recall Johnny feeling that she was trying to interfere.

Woman: In what way did he feel she was trying to interfere?

Debbie: By reporting to us things that he didn't feel were true.

Woman: Can you think of a specific instance where Ms. Heard reported something to you that you found out later was not true?

Debbie: I cannot remember specifics.

Woman: Do you recall the plan for Ms. Heard to take a few days for his health?

Debbie: I don't recall specifics.

Woman: But you do recall there being tension between Mr. Depp and Ms. Heard around this time?

Debbie: Yes.

Woman: And you recall that having an impact on Mr. Depp's treatment?

Debbie: I don't recall specifics.

Woman: Let's go on to the entry for August 25th, please. First of all, is this a note that you've prepared?

Debbie: It is.

Woman: Directing your attention to the portion that starts with 1900, the first line says, "Meeting at MD's house was quite stressful for patient." Do you see that?

Debbie: I do.

Woman: Do you recall attending a meeting with Mr. Depp at Dr. Kipper's house?

Debbie: I don't recall.

Woman: The next line says, "Him and his fiancé are having a hard time communicating and understanding each other's point of view and feelings." Do you see that?

Debbie: I do.

Woman: Do you recall any specifics about this situation?

Debbie: I do not.

Woman: A couple sentences down, it says, "Plan is for fiancé to start therapy tomorrow." Do you see that?

Debbie: Yes.

Woman: Do you recall that Ms. Heard started therapy shortly after Mr. Depp's detox process?

Debbie: I don't recall.

Woman: Do you have any understanding as to why Ms. Heard was starting therapy?

Debbie: I do not.

Woman: Directing your attention to the entry for August 27th, 2014, which starts on Depp 167...or 86, excuse me, 1686, yes. Again, this is an entry you prepared?

Debbie: It is.

Woman: Okay. Do you see where it says, "Received text from patient's sister that patient had been recording music with his friend until 5:00 and did not go to sleep until 7:00, and is currently sleeping."

Debbie: Yes.

Woman: And who is Mr. Depp's sister that's referred to here?

Debbie: Christi.

Woman: And at this time, had you met Christi before?

Debbie: I don't recall.

Woman: Have you met Christi before?

Debbie: Yes.

Woman: How many times?

Debbie: I don't know.

Woman: More than once?

Debbie: More than once, yes.

Woman: At this time, had you communicated with Christi about Mr. Depp's treatment before?

Debbie: I don't recall.

Woman: Okay. The entry goes on to say, "Sister stated that patient and his fiancé have had a disagreement last night, and that patient was able to remain calm and handle the situation appropriately." Do you see that?

Debbie: I do.

Woman: Do you recall Christi telling you that?

Debbie: I do not.

Woman: ...see the portion of the note that starts with 1330?

Debbie: I do.

Woman: The second line reads, "Patient expressing feeling about argument with fiancé, and feels relationship is putting unwanted stress on him right now." Do you see that?

Debbie: I do.

Woman: Do you recall this exchange with Mr. Depp? Sorry, I didn't catch that, Ms. Lloyd.

Debbie: I'm sorry. I do not.

Woman: Okay. Based on this note, can you tell whether this was a conversation you had in person with Mr. Depp?

Debbie: Based on this note, yes.

Woman: Do you recall on other occasions Mr. Depp expressing to you that his relationship was putting unwanted stress on him?

Debbie: I'd have to review my notes.

Woman: Okay. Directing your attention down to the portion of the note that starts with 2130. It says, "Patient back home. Per patient, he had a long conversation with fiancé, and they both understand that right now is a time to work on themselves as individuals. Patient's fiancé now has an RN to help her anxiety and to monitor her while she is starting a new mood stabilizer medication." Do you see that?

Debbie: I do.

Woman: Who was...I believe you testified to this earlier. Ms. Heard's nurse was Erin Boerum, is that right?

Debbie: [inaudible 03:00:47]

Woman: And Ms. Boerum was an employee of yours, is that correct?

Debbie: She was an independent contractor.

Woman: Okay. But you placed her [inaudible 03:01:01] Dr. Kipper, is that right?

Debbie: Correct.

Woman: Okay. Do you recall when Ms. Boerum was assigned to Ms. Heard?

Debbie: I do not recall.

Woman: Do you have any understanding as to why Ms. Heard needed a nurse?

Debbie: Other than what my notes state, I do not.

Woman: Do you recall witnessing Ms. Heard being anxious or having anxiety?

Debbie: I do not recall.

Woman: Now, the last line here says, "Patient feels this will take some of the stress of their relationship, and in return..." if you can go to the next page, "...take some stress off of him." Did I read that correctly?

Debbie: [inaudible 03:02:05]

Woman: Do you recall why Mr. Depp felt that Ms. Heard having a nurse would reduce the stress on their relationship?

Debbie: I do not recall.

Woman: From your perspective, was it important to Mr. Depp's treatment that his stress be reduced?

Debbie: Yes.

Woman: And why is that?

Debbie: Any patient going through detox or changes, it's always important to relieve as much stress as you can from them.

Woman: Let's go to the entry for September 10th, please, which is on Depp 1694, and continues on to 1695. September 10th, 2014 entry, this is your entry, correct? You prepared this?

Debbie: Correct. Sorry.

Woman: Sorry. And if I could direct your attention to the portion that starts with 2330, which is actually on the next page. The first line says, "Met with patient. He complained of body aches and nausea." Do you see that?

Debbie: I do.

Woman: And does this reflect that you were physically with Mr. Depp at this time?

Debbie: It would, yes.

Woman: Okay. A couple sentences down, it says, and this portion is highlighted here, "While RN was visiting patient, fiancé came in and tried to start argument with him. Patient was able to stay calm and talk his fiancé down." Do you see that?

Debbie: I do.

Woman: Do you recall the incident reflected in this note?

Debbie: I do not.

Woman: Do you recall any incidents where you witnessed Ms. Heard try to start a fight with Mr. Depp?

Debbie: Yes.

Woman: How many instances do you remember?

Debbie: I don't recall specific numbers.

Woman: Do you remember at least one?

Debbie: Yes.

Woman: Do you remember more than one?

Debbie: Yes.

Woman: More than two?

Debbie: I don't recall specific numbers.

Woman: Okay. What do you remember about that first instance, that you can remember?

Debbie: I remember one night trying to leave the penthouse, and Amber standing in the elevator and not letting us leave.

Woman: Why wasn't she letting you leave?

Debbie: She didn't want him to leave.

Woman: Had they been fighting previous to that point?

Debbie: I wasn't there previously.

Woman: And what's the other instance you remember?

Debbie: I can't remember specifics.

Woman: Do you have any reason to doubt the accuracy of what's reflected in your note here?

Debbie: No.

Woman: Do you have any understanding as to what you meant when you said patient was able to remain calm...was able to stay calm, excuse me, and talk his fiancé down?

Debbie: I don't recall the events of that note.

Woman: Had you seen Mr. Depp and Ms. Heard get in a fight before this date?

Debbie: I don't [crosstalk 03:06:25].

Woman: Let's go to the entry for September 12th, please. [inaudible 03:06:30]. And this is a note that you prepared as well, Ms. Lloyd?

Debbie: It is correct.

Woman: Okay. The first line here says, "RN and MD visited patient at work." Do you see that?

Debbie: I do.

Woman: And so this reflects that both you and Dr. Kipper went and saw Mr. Depp, is that right?

Debbie: Correct.

Woman: And the entry states here, "Patient expressed some concerns with fiance's behavior and how it is adding stress to his life." Do you see that?

Debbie: I do.

Woman: And do you recall Mr. Depp saying this to you in this instance?

Debbie: I do not.

Woman: Do you have any reason to doubt the accuracy of what's reflected in your note?

Debbie: I do not.

Woman: Could we please go to the entry for October 22nd, 2014, which starts on 1717 and continues on to Depp 1718.

Debbie: My notes are different. What's the top of the... Can I see the top of that, just so I know what I'm looking? Okay.

Woman: First of all, this is also a note that you prepared, correct?

Debbie: Correct.

Woman: And if you wanna take a minute and read through the note, I know it goes on for two pages.

Debbie: Okay.

Woman: Just let me know when you've read through it.

[03:09:07]

[silence]

[03:09:35]

Debbie: Okay.

Woman: Fair to say that this note reflects that you and Mr. Depp were in Georgia when the events in this note occurred?

Debbie: I think we were...at the end, it says, "Now in Georgia." I don't recall the travel day.

Woman: Well, do you see above that where it says 10-22, and then below it, it says "Now in Georgia"?

Debbie: Yeah.

Woman: Okay. So, based on your notes, you were in Georgia on October 22nd, 2014?

Debbie: Correct.

Woman: Okay. Do you recall being in Georgia with Mr. Depp?

Debbie: Yes.

Woman: Do you recall who else was with you in Georgia?

Debbie: I don't recall who was with us, but the purpose of the trip was to visit Amber on location.

Woman: Okay. So Amber was in Georgia as well?

Debbie: Yes.

Woman: Okay. And now, directing your attention to the portion of the entry which is on the next page and begins with 1530. It states here, "He requested an emergency session with the psychiatrist to discuss feeling about arguments with fiancé, and would like some tools to help him feel with his emotions." Do you see that?

Debbie: I do.

Woman: Do you recall Mr. Depp and Ms. Heard having a fight on this trip in Georgia?

Debbie: I do not.

Woman: Do you recall who Mr. Depp's psychiatrist was at this time?

Debbie: I do not.

Woman: Do you recall why Mr. Depp started seeing the psychiatrist?

Debbie: I do not.

Woman: Directing your attention down to the portion of the notes that starts with 2010, it says here, "Patient spoke to a psychiatrist for 50 minutes and was open and honest with his feelings. He feels better after conversation, but also feels he is in a no-win situation with fiancé." Do you see that?

Debbie: I'm kinda lost where we're at right now.

Woman: Oh, sorry.

Debbie: Oh, [inaudible 03:12:25], yes, yes. I see it. I'm sorry.

Woman: Okay. Does this reflect that you were present with Mr. Depp when he spoke to his psychiatrist?

Debbie: I don't remember if it was based on him telling or if I was present.

Woman: Do you recall Mr. Depp ever expressing to you that he felt he was in a no-win situation with Ms. Heard?

Debbie: I don't recall those specific words.

Woman: But you wrote them in your nursing notes, correct? Still in this portion that starts with 2010, do you see where it says, "Plan is for patient and fiancé to go to dinner this evening. Patient is feeling exhausted and wants to stay home but does not want to upset fiancé." Do you see that?

Debbie: We're on the same page?

Woman: Yes, we're still in the portion of the note that starts with 2010.

Debbie: 2010. Okay, yes, yep.

Woman: Do you recall the specific incident?

Debbie: I do not.

Woman: Do you have any understanding as to why Mr. Depp would be concerned about upsetting his fiancé?

Debbie: I do not.

Woman: If we could go on to the next entry, which is on the same page, 1023. And this is also a note you prepared, Ms. Lloyd?

Debbie: It is.

Woman: Okay. It says here, you "Texted patient to see if RN could come by and check him." Do you see that?

Debbie: I do.

Woman: Why did you wanna check in on Mr. Depp?

Debbie: I don't recall.

Woman: Were you ever concerned about Mr. Depp when he and Ms. Heard were in arguments?

Debbie: Yes.

Woman: Why were you concerned?

Debbie: Their arguments were a trigger for him emotionally.

Woman: Any other reasons?

Debbie: No.

Woman: What do you mean by a trigger for him emotionally?

Debbie: They caused him to be upset, add stress.

Woman: The next portion of this note says, "When RN arrived in the room, patient was agitated and felt fiancé was using the term 'mania' to explain his behavior and excuse herself from any fault during arguments." Do you see that?

Debbie: Yeah.

Woman: Did you ever hear Ms. Heard use the term "mania" to describe Mr. Depp?

Debbie: I don't recall if I heard it from her or heard it that she was saying it to others.

Woman: But you do have some recollection of hearing that Ms. Heard was using that word, whether it was directly from her or from others?

Debbie: Yes.

Woman: The note goes on to say, "Patient was upset by this label. RN processed those feelings with patient, and he was able to see fiance's negative behavior." Did I read that correctly?

Debbie: Yes.

Woman: Do you have any recollection of what you meant when you wrote that?

Debbie: I do not.

Woman: You don't have any understanding of what "fiance's negative behaviors" refers to?

Debbie: I don't recall specifics.

Woman: Do you recall generally?

Debbie: Yes.

Woman: And what do you recall?

Debbie: At times, she...what's the word? She would almost try to instigate him.

Woman: And when you say "she," you're referring to Ms. Heard?

Debbie: Yes.

Woman: Did you ever witness that personally?

Debbie: Yes.

Woman: On more than one occasion?

Debbie: Yes.

Woman: Ballpark, how many times did you witness that during the time you cared for Mr. Depp?

Debbie: I don't recall a number.

Woman: More than five?

Debbie: I don't recall.

Woman: When you say Ms. Heard would try to instigate him, what do you mean?

Debbie: I remember an argument, or being in there when he was going from room to room trying to remove himself from a situation, and she would just follow him from room to room and not give him his space.

Woman: And that's one specific instance that you remember?

Debbie: Yes.

Woman: Do you remember seeing that type of behavior on other occasions?

Debbie: Yes.

Woman: Are you aware of any of the fights that we just went through...are you aware that any of them became physical?

Debbie: No.

Woman: From what you observed, what was the cause of the friction between Mr. Depp and Ms. Heard during this time?

Debbie: I don't know.

Woman: Could we please go to the entry for November 3rd, 2014, which is on Depp 1721.

Woman: 172...sorry, counsel.

Woman: Yes, 1721. All right. Ms. Lloyd, this is also a note you prepared?

Debbie: Correct.

Woman: And it says here you "Arrived at Mr. Depp's home, and he was focused on relationship with fiancé and is struggling with conflicted emotions." Did I read that right?

Debbie: Yes.

Woman: Based on this note, is that something Mr. Depp would have told you?

Debbie: Based on this note, it appears so.

Woman: Looks like there's another note for November 3rd below this one. Do you see that?

Debbie: Yes.

Woman: And it continues on to the next page, which is Depp 1722, if we could go there, please.

Man: [inaudible 03:21:03]

Woman: And Ms. Lloyd, directing your attention to the portion that starts with 1700, do you see where it says, "RN went back to patient's house. He was chatting with a friend and is feeling stressed about his relationship." Do you see that?

Debbie: I do.

Woman: And it goes on to say, "He feels she is not being truthful with him, and he is not sure how to comfort her about this when..." Excuse me. "...confront her about this when she arrives home." Do you see that?

Debbie: Yes.

Woman: And the "she" here refers to Ms. Heard, is that right?

Debbie: Correct.

Woman: Do you remember this exchange with Mr. Depp?

Debbie: [crosstalk 03:21:53]

Man: Objection, hearsay.

Woman: Do you have any reason to doubt the accuracy of your note?

Debbie: I do not.

Woman: If we could turn to the entry for November 17th, 2014, which begins on Depp 1723, [inaudible 03:22:19]. Ms. Lloyd, do you see at the very bottom, it says 1117?

Debbie: Yes.

Woman: Okay. And then I think the entry itself is on the next page. Yes, thank you. This is also a note you prepared?

Debbie: Correct.

Woman: And this says, "RN and MD went to patient's house to assess him." Do you see that?

Debbie: I do.

Woman: And so again, this reflects that you and Dr. Kipper went to see Mr. Depp?

Debbie: Correct.

Woman: Do you have any recollection of why Mr....or excuse me, why Dr. Kipper was visiting with Mr. Depp at this time?

Debbie: I do not.

Woman: The next line says, "Patient appeared anxious and depressed over relationship issues." Do you see that?

Debbie: I do.

Woman: And then it says, "Patient continues to be ambivalent about relationship status." Do you see that?

Debbie: I do.

Woman: Do you recall Mr. Depp expressing these sentiments to you?

Man: Objection, hearsay.

Debbie: I don't recall specific conversations.

Woman: But this is what you wrote in your notes, correct? I'm sorry I didn't catch that.

Debbie: Correct, sorry.

Woman: Okay, sorry. Do you recall when Mr. Depp and Ms. Heard got married?

Debbie: I don't recall the date.

Woman: Okay. But you said...you testified earlier that you did attend the wedding?

Debbie: Correct.

Woman: Were you there to provide nursing services?

Debbie: I don't really recall if I was a guest or...I don't think they made that clear to me.

Woman: Did Dr. Kipper attend the wedding?

Debbie: He did.

Woman: And did Erin Boerum attend the wedding?

Debbie: She did.

Woman: Do you recall any discussions of a prenuptial agreement between Mr. Depp and Ms. Heard before they got married?

Debbie: Yes.

Woman: And what do you recall?

Debbie: I don't recall specifics.

Woman: What do you recall generally?

Debbie: I only recall what Johnny told me about the conversation.

Woman: And what was that?

Debbie: That she didn't take it well.

Woman: Didn't take what well?

Debbie: The idea [inaudible 03:25:14].

Woman: Sorry, I didn't hear the end of that.

Debbie: The idea of having to sign a prenup.

Woman: Did Johnny tell you that he asked Ms. Heard to sign a prenup?

Debbie: I don't recall specifics.

Woman: But you recall Johnny telling you that Ms. Heard didn't want to sign a prenup.

Debbie: Yes.

Woman: And when you say "didn't take that well," what are you referring to?

Debbie: From what Johnny said her reaction was when they spoke about the prenup.

Woman: Do you recall that in January of 2015, Mr. Depp and Ms. Heard traveled to Japan together?

Debbie: I don't recall.

Woman: Do you recall traveling to Japan with Mr. Depp?

Debbie: I recall being in Japan, yes.

Woman: Okay. Do you remember anything specific about that trip?

Debbie: I do not.

Woman: Do you recall Mr. Depp and Ms. Heard having a fight on a plane?

Debbie: I recall a fight on a plane, but I don't know the time it was around.

Woman: What do you remember about that fight?

Debbie: It was another instance where he was sitting at a table and not wanting to talk, and she wouldn't leave the table.

Woman: What was she doing?

Debbie: She wouldn't leave the table. And was saying, you know, "Please, just go away."

Woman: And what was she saying?

Debbie: I don't remember her words.

Woman: How was her tone?

Debbie: I don't recall.

Woman: Okay. You spoke with Mr. Nadelhaft about this earlier, but at some point you traveled to Australia with Mr. Depp, right?

Debbie: Correct.

Woman: Can we pull up what has been previously marked as exhibit 14? I'd like to direct your attention to the March 1st, 2015 email from Dr. Kipper at 2:10 p.m. Do you see that?

Debbie: I do.

Woman: Do you recall Mr. Depp having issues with his sleep when he was in Australia?

Debbie: Not specifically in Australia.

Woman: Do you recall Mr. Depp having issues with his sleep generally?

Debbie: Yes.

Woman: And what issues were those?

Debbie: A hard time sleeping and staying on a sleep schedule.

Woman: Ms. Lloyd, when you were in Australia with Mr. Depp, did you see where he was staying?

Debbie: Yes.

Woman: And how many times did you go to that property?

Debbie: I don't recall specific numbers.

Woman: Fair to say you went there multiple times, though?

Debbie: Yes.

Woman: You talked about this with Mr. Nadelhaft earlier. At some point in Australia, you learned that Mr. Depp had injured his finger, correct?

Debbie: Correct.

Woman: And Dr. Kipper was already in Australia at that time?

Debbie: Correct.

Woman: And you testified earlier that you and Dr. Kipper went to see Mr. Depp after he injured his finger, correct?

Debbie: Correct.

Woman: What do you recall about Mr. Depp's physical appearance when you first saw him?

Debbie: I don't recall specifics.

Woman: What do you remember about his demeanor, if anything?

Debbie: I don't remember the events of when I first arrived.

Woman: But you did see Mr. Depp at that time, correct?

Debbie: I can't recall when I initially saw him after the finger event.

Woman: And I believe you testified you don't recall whether Ms. Heard was at the house when you went to attend Mr. Depp, correct?

Debbie: Correct.

Woman: Okay. Do you remember seeing Ms. Heard in Australia?

Debbie: Yes.

Woman: Did you ever see any injuries on Ms. Heard when she was in Australia?

Debbie: Yes.

Woman: What did you see?

Debbie: A bruise on her arm.

Woman: Anything else?

Debbie: No.

Woman: Did she have any injuries to her face that you can recall?

Debbie: Not that I recall.

Woman: Any cuts or abrasions that you can recall?

Debbie: Not that I recall.

Woman: Do you recall Ms. Heard ever seeking medical treatment from you while she was in Australia?

Debbie: I do not recall her ever seeking medical treatment from me.

Woman: At the time that Mr. Depp injured his finger, Ms. Heard was a patient of Dr. Kipper, correct?

Debbie: I'm not sure.

Woman: Do you recall whether Ms. Boerum was already assigned to Ms. Heard?

Debbie: I don't recall if she was working with her at that time.

Woman: Can we turn back to the nursing notes, which is Exhibit 23? And specifically the entry for March 7th, which is on 1732.

Debbie: Is this March 7th of 2014, or...?

Woman: Yes. It says 3715. Do you see that?

Debbie: Oh, so 15. Hold on. No. [inaudible 03:32:41]. Yes.

Woman: You said you saw a bruise on Ms. Heard's arm at some point when you were in Australia, correct?

Debbie: Correct.

Woman: Do you have any understanding of how she got that bruise?

Debbie: I do not.

Woman: Okay. Directing your attention to the entry for March 7th, 2015. Do you see here, it says, "MD received text message from client that he had been arguing with his wife, and that he had cut his finger"?

Debbie: Yes, I see that.

Woman: Okay. So this is the day that you went and saw Mr. Depp after his injury, correct?

Debbie: Correct.

Woman: Now, if I could direct your attention down to the portion that starts with 1530. It says, "MD cleaned and dressed wound to R middle finger." Do you see that?

Debbie: I do.

Woman: What does "R middle finger" reflect?

Debbie: Right.

Woman: And so Mr. Depp had cut his middle right finger, is that correct?

Debbie: According to this, yes.

Woman: Now, if I could direct your attention down to the bottom part of this entry that starts with 1130. Do you see that?

Debbie: I do.

Woman: Now, this starts with, "Patient and staff returned from ER at 2130." Do you see that?

Debbie: I do.

Woman: So, is it correct that the 1130 at the beginning of this is referring to 11:30 p.m.?

Debbie: Yeah, that would make sense.

Woman: Oh. All right. So this is the same day that you were notified that Mr. Depp had injured his finger, correct?

Debbie: According to this, yes.

Woman: Okay. And this was also the same day that Mr. Depp was seen in the ER for his finger, correct?

Debbie: Correct.

Woman: Okay. In the middle of the page here, do you see...or in the middle of this entry, do you see where it says, "Upon arrival back to apartment, patient discussed feelings of anger and sadness about his relationship. Patient was encouraged to stay away from wife, as the relationship is toxic. Patient expressed verbal understanding in why they needed to separate." Do you see that?

Debbie: I do.

Woman: Do you have any recollection of this conversation beyond what's reflected in the notes?

Debbie: I do not.

Woman: Do you have any reason to doubt the accuracy of what you documented in your notes?

Debbie: I do not.

Woman: Do you recall advising Mr. Depp to stay away from Ms. Heard?

Debbie: I don't recall anything other than what's stated in my notes.

Woman: Do you recall ever having the view that Mr. Depp and Ms. Heard's relationship was toxic?

Debbie: Yes.

Woman: And what's the basis for that view?

Debbie: Conversations that he would share with me.

Woman: What did Mr. Depp share with you?

Debbie: I don't remember specifics, just, like, things we've reviewed in my notes, that he would be emotional and that the relationship was causing him stress.

Woman: After Mr. Depp injured his finger in Australia, do you recall him coming back to LA?

Debbie: Yeah, I don't recall specifics, but I know we did return to LA at some point.

Woman: Was Mr. Depp's hand bandaged at all?

Debbie: Yes.

Woman: And why was that?

Debbie: I mean, beforehand, we kept it bandaged to keep it clean, and then he had surgery, and it was bandaged after the surgery.

Woman: Do you recall that Mr. Depp had pins in his finger?

Debbie: Yes.

Woman: Do you recall Mr. Depp reporting that his finger was in pain?

Debbie: Yes.

Woman: How would he report his pain to you?

Debbie: I'd have to review my notes for specifics.

Woman: Well, let's take a look at the entry in your notes for March 21st, 2015, which is on page...it starts on page 1735 and goes on to 736. [inaudible 03:38:30].

Debbie: I see it.

Woman: Actually, before we turn to that one, do you see in the entry above for 3/22/15? Do you see that entry?

Debbie: Yep.

Woman: Okay. And do you see the portion of the entry that starts with 2015? Do you see in the middle it says, "Currently, 5/10"?

Debbie: Yes.

Woman: Do you know what that refers to?

Debbie: It's a pain scale.

Woman: Okay. And is that how Mr. Depp would report his pain to you?

Debbie: According to my notes.

Woman: Okay. Okay, so now going to the entry for March 23rd. First of all, do you see the portion of the entry that starts with 120?

Debbie: Yes.

Woman: Is this 120 in the morning, a.m.?

Debbie: According to this, yes.

Woman: Okay. Do you see it says, "Patient states his wife is trying to argue with him."

Debbie: I see that.

Woman: Okay. And again, you have no reason to doubt the accuracy of your notes?

Debbie: Correct.

Woman: Okay. Turning to the next page, do you see the portion of the note that starts with 545?

Debbie: Yes.

Woman: And it says, "Call to loft," correct? What does that refer to?

Debbie: I don't specifically. Loft is where they were living.

Woman: Is that the Eastern Columbia building?

Debbie: Correct.

Woman: And then the next two sections of this note says, "820, toradol val." And then at 1445, the same thing. Do you see that?

Debbie: Yes.

Woman: What is that referring to?

Debbie: Incomplete notes. It would have been toradol and valium administered.

Woman: And do you have any recollection as to why those medications would have been administered?

Debbie: They were for his pain.

Woman: Okay. And then do you see below that, it says, "FU, Thursday afternoon and Tuesday afternoon, skin graft bandage off weak from Tuesday. Pin off in two weeks."

Debbie: Yes.

Woman: What does this reflect?

Debbie: I don't recall.

Woman: Did Mr. Depp have a skin graft on his finger?

Debbie: He did.

Woman: And I think you just testified he had pins in his fingers as well, right? Sorry, I didn't hear that.

Debbie: Correct.

Woman: Okay. So, at this time on March 23rd, he had bandages and a skin graft and pins in his finger?

Debbie: According to this, yes.

Woman: And then do you see in the section that starts with 20-100, "Patient informed wife is coming to talk to him, and he became extremely anxious." Do you see that?

Debbie: I do.

Woman: Do you have any recollection of why Mr. Depp was anxious?

Debbie: I do not.

Woman: Do you remember being present for a fight between Mr. Depp and Ms. Heard shortly after Mr. Depp returned from Australia?

Debbie: I don't remember specifics.

Woman: Do you recall a fight when Amber's sister Whitney was present?

Debbie: I don't recall.

Woman: Can we please pull up Document H, please?

Woman: Exhibit 27.

Woman: Now just for the record, this is the document that has the face number WH106 through 109. And Ms. Lloyd, you're not included on this, but I just wanna direct your attention to the first text message here. I can represent to you these are text messages between Erin Boerum and Whitney Heard. And before I proceed, do you know who Whitney Heard is?

Debbie: Yes.

Woman: Have you met her before?

Debbie: Yes.

Woman: On how many occasions have you met Whitney?

Debbie: I don't recall.

Woman: And what is Whitney's relation to Ms. Heard?

Debbie: Sister.

Woman: Okay. This first text message appears to be from Erin Boerum, and it says, "Debbie just..." and it's on 14...is that 1432 in military time on the date March 3rd, 2015. Do you see that?

Debbie: Yes.

Woman: Okay, and it says, "Debbie just told me what is going on and to check with you. Is Amber awake, or fall asleep? Do you see that?"

Debbie: I do.

Woman: Do you recall reaching out to Erin Boerum on this date?

Debbie: I do not.

Woman: Directing your attention down to Whitney's...to three messages down from Whitney. Or excuse me, let's go up. Do you see that Whitney responds to Erin, "She finally fell asleep." And then Erin says, "Thank goodness. She must be exhausted. Do you want me to come to the loft, or is she safe and sound asleep?" Do you see that?

Debbie: I do.

Woman: Okay. And then Whitney responds, "Safe? No, she's not. She keeps saying she wants to kill herself." Do you see that?

Debbie: I do.

Woman: Did you hear Ms. Heard say that she wanted to kill herself?

Debbie: No.

Woman: Okay. Do these text messages, combined with your notes, refresh your recollection about an incident that occurred that on March 23rd, 2015?

Debbie: I remember an incident, but I don't remember the dates of it.

Woman: What incident are you remembering?

Debbie: There is an incident where Johnny and Amber got into a fight at the loft.

Woman: And what do you remember about that?

Debbie: I was staying next door at a hotel, and security had come to get me, saying that they had had an argument, and Johnny wanted to go back to 86.

Woman: Sorry, is 86 the Sweetzer property?

Debbie: Yes.

Woman: Okay, sorry. Continue.

Debbie: So I went to the loft, and I remember that night, Amber was already leaving. She was in the lobby when we walked through, and when she saw that I was coming, she came back up to the apartment.

Woman: And what happened when Ms. Heard came back up to the apartment?

Debbie: I don't remember specifically what happened. I remember Johnny was sitting outside, and we went to leave, and somehow we didn't end up leaving.

Woman: And why didn't you end up leaving?

Debbie: I don't remember.

Woman: Do you remember who else was in the apartment?

Debbie: I remember Travis, one of the security guards was there.

Woman: Anyone else that you can remember?

Debbie: I don't remember exactly who else was there.

Woman: And is Travis, Travis McGivern?

Debbie: Correct.

Woman: Do you recall seeing Mr. Heard throw anything at Mr. Depp?

Debbie: I do not.

Woman: Do you remember Mr. Depp throwing anything at Ms. Heard?

Debbie: I don't recall.

Woman: Do you remember witnessing any physical violence on that occasion?

Debbie: I saw Johnny push over one of Amber's clothing racks.

Woman: Okay. No physical violence directed at any...

Debbie: No.

Woman: ...human, correct? Okay. Okay. And then you said you did end up leaving the apartment after that, correct?

Debbie: At some point that night, we left.

Woman: And when you say "we," who does that include?

Debbie: Myself, Johnny, and Travis.

Woman: And where did you go?

Debbie: I don't remember.

Woman: Okay. Do you know where Amber went that night?

Debbie: I don't know.

Woman: Okay. But she didn't come with you?

Debbie: No.

Judge Azcarate: Ladies and gentlemen, let's go ahead and take our afternoon recess for 15 minutes, okay? Again, don't talk to anybody, and don't do any outside research, okay? All right, we'll see you in 15 minutes.

[03:50:06]

[silence]

[03:50:34]

Judge Azcarate: All right, we'll come back at 3:45 then? Okay. All right, thank you. All right, are we ready for the jury?

Man: [inaudible 03:50:44]

Judge Azcarate: Yes? Okay. We're ready for the jury? Okay. Thank you. All right, thank you. All right, you wanna continue with the testimony? Thank you.

Woman: Can we please go back to the nursing notes, which are Exhibit 23. And specifically, could we go to the entry for March 25th that starts on Depp 1736 and goes on to 1737. Ms. Lloyd, do you see at the bottom where it says 325?

Ms. Lloyd: Yes.

Woman: Okay. And if we could just go to the next page. You'd agree that this is a continuation of that note, correct?

Ms. Lloyd: Yes.

Woman: Okay. And do you see under 1330, it says, "Patient states pain is 4 out of 10." Do you see that?

Debbie: I do.

Woman: Okay. And what does that reflect?

Debbie: Pain was being rated at a 4 out of 10, out of 10 out of 10.

Woman: And then directing your attention down to the entry for March 26th. This is a note that you prepared, yes?

Debbie: Yes.

Woman: Okay. And just make sure, I'm not sure I've asked, but the prior two notes we looked at, those are also notes you prepared, right?

Debbie: Correct.

Woman: Okay. Now, why don't you take a moment and read through this note, and just let me know when you're done.

[03:53:04]

[silence]

[03:53:22]

Debbie: Okay.

Woman: Now, the beginning of the note starts at 1:45. Do you see that?

Debbie: I do.

Woman: And so again, is that 1:45 in the morning?

Debbie: Correct.

Woman: Okay. And it says here, "RN called the patient's home. Upon arrival, patient and wife were fighting in the garage. Do you see that?"

Debbie: I do.

Woman: Do you remember this incident?

Debbie: I do not.

Woman: It says, "When argument became heated, patient removed himself from situation and had security drive him to another home." Do you see that?

Debbie: I do.

Woman: I think you just testified you don't remember witnessing this, correct?

Debbie: I do not.

Woman: Well, you don't have any reason to doubt the accuracy of what you wrote down in your note, correct?

Debbie: I do not.

Woman: Had you seen Mr. Depp remove himself from fights before in this manner?

Debbie: Yes.

Woman: Could we please turn to the entry for March 31st, which is on page Depp 1740. Ms. Lloyd, this is also a note you prepared?

Debbie: It is.

Woman: Do you see the portion that starts, "1:30. Patient continues to CO pain 10/10, which is causing anxiety and insomnia." Do you see that?

Debbie: Yes.

Woman: What does this mean, plaintiff "continues to CO pain 10/10"?

Debbie: Complain of.

Woman: Okay. And the 10 out of 10 is the pain on the scale that you referenced previously, correct?

Debbie: Correct.

Woman: Directing your attention down to the portion that starts with 1616. It says, "A follow-up with surgeon. Bandage was removed from skin graft. Graft took 100%, but there was an infection under bolster. Finger was drained, pin was removed, and Rocephin 1g was administered during appointment." Did I read that correctly?

Debbie: Yes.

Woman: And if my pronunciation is incorrect... Does this reflect that Mr. Depp had the bandage from his skin graft on his right middle finger removed on this date?

Debbie: Meaning removed at that time, or removed for good?

Woman: Removed at that time.

Debbie: Yeah, at that time, that's what that would mean.

Woman: And the pin from his finger was also removed?

Debbie: According to this.

Woman: Okay. And when you say the bandage was removed at that time, are you clarifying that because another bandage was put on?

Debbie: I don't remember. That's why I was clarifying.

Woman: Okay. Do you remember what type of bandages Mr. Depp had on his hand at the time?

Debbie: I didn't hear you. What type of bandage?

Woman: Yes.

Debbie: I don't remember specifics.

Woman: Was it a hard cast or a soft cast?

Debbie: Soft.

Woman: Okay. Was Mr. Depp's hand... I'm sorry.

Debbie: I don't recall if it was a cast, but I know the bandage was soft.

Woman: Okay. Do you recall whether Mr. Depp could move the hand that was bandaged?

Debbie: Hand, yes, for a while. His finger was, like, splinted.

Woman: Okay. Could he grab anything with that hand?

Debbie: I remember him pretending he had a claw. He could do this.

Woman: Were certain fingers bound together in the cast?

Debbie: I don't remember specifics.

Woman: Okay.

[03:58:13]

[silence]

[03:58:41]

Woman: Mr. Depp eventually returned to Australia after the time period we were just discussing, correct?

Debbie: Correct.

Woman: And you returned with him?

Debbie: Correct.

Woman: And how long did you stay in Australia on that trip?

Debbie: I don't recall.

Woman: I'd like to direct your attention to the last page of this document, [inaudible 03:59: 22] for July 1st. Do you see that?

Debbie: Yes.

Woman: Please take a moment and read through this, and just let me know when you're done.

[03:59:38]

[silence]

[03:49:55]

Debbie: I'm done.

Woman: Okay, great. This is a note you prepared, yes?

Debbie: Correct.

Woman: And do you remember the events reflected in this note?

Debbie: I do not.

Woman: Directing your attention to the portion that starts with 12:35, do you see where it says, "RN received text from Patient's assistants that the arguments between patient and wife are continuing, and RN should come to the set to see patient." Did I read that correctly? Sorry, I didn't hear your reply.

Debbie: Yes.

Woman: Okay. Who is the assistant referred to here, if you can recall.

Debbie: I don't recall. He had two main assistants.

Woman: And who were they?

Debbie: Stephen and Nathan.

Woman: Do you recall both of them being in Australia?

Debbie: I don't recall if they were both there.

Woman: Why did you understand... Scratch that. Why did you understand that you were being called to set?

Man: Objection, hearsay.

Debbie: I don't recall at the time.

Woman: All right. Now, directing your attention to the last part of this note that says 2100. Says here, "Between shooting, patient was able to express his feeling to RN. He explained that his wife makes him feel that he can never do anything right, and that they cannot have a conversation without her blowing up." Do you see that?

Debbie: I do.

Woman: And I think you testified you don't recall having this exchange with Mr. Depp.

Debbie: Correct.

Woman: It goes on to say, "Patient was given positive reinforcement for expressing his feelings. Patient verbalized he knows it's best for them to take a break from each other when the fights start to escalate, but how she will follow him from room to room when he tries to get away." Do you see that?

Debbie: I do.

Woman: Have you ever personally observed Mr. Depp try to get away from Ms. Heard and her then following him?

Debbie: Yes.

Woman: But you don't recall him telling you in this specific instance?

Debbie: I do not.

Woman: And again, you don't have any reason to doubt the accuracy of this note?

Debbie: I do not.

Woman: Okay. This appears to be the last note reflected in this document. Do you see that?

Debbie: I do.

Woman: And I think you said you don't recall specifically when you stopped caring for Mr. Depp, correct?

Debbie: [inaudible 04:03:16]

Judge Azcarate: I'm sorry, what was the answer? Sorry.

Debbie: Correct.

Judge Azcarate: Sorry, thank you.

Woman: Do you recall why you stopped providing nursing services to Mr. Depp?

Debbie: I do not.

Woman: Did you continue to work for Dr. Kipper after you stopped providing nursing services to Mr. Depp?

Debbie: Yes.

Woman: Now, I think you testified earlier you don't recall the last time you saw Mr. Depp.

Debbie: Not for sure, no.

Woman: What's the last time that you remember seeing him?

Debbie: I went one of his...Hollywood Vampire show out here in the desert.

Woman: Was Mr. Depp and Ms. Heard still in a relationship when you saw Mr. Depp the last time?

Debbie: No, not that I was aware of.

Woman: When was the last time you saw Ms. Heard?

Debbie: I have no idea.

Woman: What's the last time you remember seeing her?

Debbie: I honestly don't know.

Woman: During the time you were Mr. Depp's nurse, did you ever see Mr. Depp physically abuse Ms. Heard?

Debbie: No.

Woman: If you had witnessed this, would you have documented it in your nursing notes?

Debbie: Yes.

Woman: Did you ever see Mr. Depp throw anything at Ms. Heard?

Debbie: I do not recall ever seeing him throw anything.

Woman: During the time you cared for Mr. Depp, did you ever see Ms. Heard physically abuse Mr. Depp?

Debbie: No.

Woman: Did you ever see Ms. Heard throw anything at Mr. Depp?

Debbie: I don't recall.

Woman: In the time that you cared for Mr. Depp, did he ever tell you that Ms. Heard was physically abusive towards him?

Debbie: I don't recall any conversations like that.

Woman: Were you ever concerned for Mr. Depp's safety around Ms. Heard?

Debbie: No.

Woman: Were you ever called over by Mr. Depp when he was in a fight with Ms. Heard?

Debbie: I can't remember if it was when a fight. I remember being called over after fights.

Woman: And to the extent you know, why were you being called over?

Debbie: My role with Johnny was medication and emotional support.

Woman: How many times did you travel with Mr. Depp while he was under your care?

Debbie: Multiple, but I don't know a specific number.

Woman: Did you ever witness Mr. Depp and Ms. Heard get in arguments while you were traveling?

Debbie: Yes.

Woman: And what would Mr. Depp do in those circumstances?

Debbie: I don't remember specifics, other than the one time I mentioned on the airplane.

Woman: Did Mr. Depp ever book a separate room to separate himself from Ms. Heard?

Debbie: I don't recall.

Woman: Have you ever witnessed Ms. Heard lose her temper?

Debbie: I don't recall specifics.

Woman: What do you recall generally?

Debbie: I can't recall.

Woman: In the time you treated Mr. Depp, did you ever suspect he was under the influence of alcohol?

Debbie: I don't recall specific times being of concern.

Woman: Do you recall any specific instances when you were concerned he was under the influence of drugs that had not been prescribed by one of his physicians?

Debbie: I do not recall.

Woman: Did Mr. Depp ever tell you that someone had taken his prescription drugs?

Debbie: I don't recall a conversation.

Woman: Could we pull up Exhibit I, please?

Woman: Please stand by.

Woman: And just for the record, this is a document bearing the face numbers Depp 7804 through 7848.

Woman: Exhibit 28.

Woman: Ms. Lloyd, I'll represent that these are text messages between you and Mr. Depp. I think you've seen some portions of this document when you were answering Mr. Nadelhaft's questions. But I'd like to just direct you attention specifically to messages between you and Mr. Depp on May 27th, 2015, which appears on page 7841 and goes through to 7843.

Woman: Sorry, counsel, was there an instruction?

Woman: Oh, yes. I'm sorry. Can you please go to the page 7841, and we're gonna be scrolling through the pages after that. [inaudible 04:10:48] two pages [inaudible 04:10:53]. Yep. Great. Do you see the text message that starts in row 320?

Debbie: Yes.

Woman: Okay. So, I would like you to please read through the text messages in row 320 through 337, which are from May 27th, 2015. And before you begin, I just wanna confirm, this number under Participants next to your name, that's your phone number?

Debbie: Oh yeah, but I was looking below. I was like, no. But above, yes.

Woman: Okay. Okay, so if you could read through the text messages reflected in rows 320 through 337, and then just let me know when you're done.

Debbie: Okay, I'm done through 322. Okay, I'm done through 330.

Woman: Are you done through 337?

Debbie: Oh yeah, yeah. I was on [inaudible 04:12:09].

Woman: All right. Do you recall this exchange with Mr. Depp?

Debbie: I do not.

Woman: Do you have an understanding of what you and Mr. Depp are discussing?

Debbie: I mean, just from what the text messages says, I can see what he was saying.

Woman: And what was Mr. Depp saying?

Debbie: That his as-needed medications were missing.

Woman: Anything else about how they came to be missing?

Debbie: I already don't remember what the above text stated.

Woman: Okay, let's go to the text that's in row 33, please...or 333, please. And it says here, "Saw them. She wiped me out of everything. Need Adderall and the PRNs. I don't like to be out of stuff on the just-in-case kinda deal. I can't believe she's got the balls to flat-out steal my meds for her fuckin' debaucheries. Hard game. After all, she is the sister. X, me." Did I read that right?

Man: Objection, hearsay.

Woman: Do you have any understanding as to what Mr. Depp is referring to there?

Debbie: I do not.

Woman: Do you know he's referring to when he says, "She is the sister"?

Debbie: I do not.

Woman: Sure. How did Ms. Heard treat you when you first started caring for Mr. Depp?

Debbie: She was accepting.

Woman: Did that ever change in the time you treated Mr. Depp?

Debbie: I felt it did.

Woman: You felt that, at some time, Ms. Heard's demeanor towards you changed, correct?

Debbie: Yes.

Woman: Okay. When did you recall her demeanor changing?

Debbie: I don't recall specifically.

Woman: How did her treatment of you change?

Debbie: It wasn't so much her treatment of me, of me hearing that she didn't want me around, from other members.

Woman: Who did you hear that from?

Debbie: I don't recall specific...it was from other staff, people that we worked with.

Woman: Do you have any understanding as to why she didn't want you around?

Debbie: I do not.

Woman: Was Ms. Heard unfriendly towards you?

Debbie: No.

Woman: Did Ms. Heard ever get angry at you in your presence?

Debbie: Not that I recall.

Woman: So, just to be clear, your understanding, that Ms. Heard's feelings towards you changed, is based off of what you heard from other people, correct?

Debbie: Yes.

Woman: Okay. And your understanding was that, as you said, she didn't want you around, correct?

Debbie: Yes.

Mr. Nadelhaft: Mr. Depp was your patient, correct?

Debbie: Correct.

Mr. Nadelhaft: And Amber Heard was not your patient, is that right?

Debbie: Correct.

Mr. Nadelhaft: You had testified before, I believe, that you said one of your roles for Mr. Depp was providing him emotional support. Did I recall that correctly?

Debbie: Correct.

Mr. Nadelhaft: You didn't have that role for Amber Heard, correct?

Debbie: Correct.

Mr. Nadelhaft: Okay. One of the exhibits I saw, it was Exhibit, I believe, Lloyd 22, there was a reference to polysubstance abuse. What is that?

Debbie: Polysubstance abuse is used to determine the use of different drugs and/or alcohol.

Mr. Nadelhaft: So it's abusing more than one drug or alcohol, is that right?

Debbie: That's what the term means, yes.

Mr. Nadelhaft: Okay. Could we go to Lloyd 23? So Ms. Lloyd, it would be the March 7th, 2015 entries.

Debbie: March... Okay.

Mr. Nadelhaft: Can you see the entry for 1300?

Debbie: Yes.

Mr. Nadelhaft: You wrote, "Patient was having a hard time leaving the house, so security suggested the MD and RN go to house to see patient. Upon arrival to 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." You wrote that?

Debbie: I did.

Mr. Nadelhaft: And you wrote that based off of information you were provided?

Debbie: I don't recall what that first sentence is regarding.

Mr. Nadelhaft: All right, you don't have any reason to question the accuracy of the statement?

Debbie: I do not.

Mr. Nadelhaft: Okay. And then at 11:30, the bottom entry, you had testified a bit to that. After the highlighted portion, it says, "MD offered patient valium 10 milligrams IM to help with his anxiety and anger, but patient refused." You wrote that?

Debbie: I did.

Mr. Nadelhaft: Okay. And you have no reason to question the accuracy of that?

Debbie: I do not.

Mr. Nadelhaft: Okay. Do you recall Mr. Depp expressing any anger?

Debbie: Only what I see I referred to earlier in that note, the portion that was highlighted.

Mr. Nadelhaft: Okay. Then highlighting those...going to the next page. "Patient was talking about wanting to drink alcohol, but did not obtain any." You wrote that?

Debbie: I did.

Mr. Nadelhaft: And that was based off of what you saw with Mr. Depp?

Debbie: According to this, yes.

Mr. Nadelhaft: Okay. And there's no reason to question the accuracy of that note?

Debbie: Correct.

Mr. Nadelhaft: Okay. And then at 3815, 1:45, you write, "Patient has been on phone with his security guard and is staying with his wife at their rented house. Patient is discussing wanting to go home to LA tomorrow in rehashing night. Patient's personal security guard came to stay with patient. RN will be next door and instructed security to call during the night if needed." You wrote that?

Debbie: Correct.

Mr. Nadelhaft: Do you know what you meant by "Patient is discussing wanting to go home to LA tomorrow and rehashing night"?

Debbie: I do not recall what that's referring to.

Mr. Nadelhaft: I believe you testified way in the beginning that you go to Dr. Kipper as a patient. Is that right?

Debbie: Correct.

Mr. Nadelhaft: Okay. Not going into details, but how long have you been his patient?

Debbie: Since before I went to nursing...early 2000s.

Mr. Nadelhaft: Okay. And you consider Dr. Kipper to be a friend?

Debbie: Yes.

Mr. Nadelhaft: Okay.

Woman: When you were with Mr. Depp in Australia, was he drinking at that time?

Debbie: I don't recall him drinking.

Woman: Do you recall that he was specifically abstaining from drinking during that time?

Debbie: I don't recall.

Woman: Did you ever see Ms. Heard drink in front of Mr. Depp while he was abstaining from alcohol?

Debbie: Yes.

Woman: Did he ever ask her not to do that, to your knowledge?

Debbie: Not to my knowledge.

Judge Azcarate: All right. Your next witness?

Man: Your Honor, Mr. Depp calls Sean Bett.

Judge Azcarate: Sean Bett. And how do you spell the last name? I'm sorry.

Sean: B-E-T-T.

Judge Azcarate: B-E-T-T. Thank you.

Sean: Thank you.

Judge Azcarate: Mm-hmm. Oh, [inaudible 04:20:44].

[04:20:47]

[silence]

[04:21:15]

Woman: Would you solemnly swear or affirm to testify truthfully [inaudible 04:21:19].

[04:21:21]

[silence]

[04: 21:37]

Judge Azcarate: All right, thank you, ma'am.

Woman: Thank you.

Woman: Good afternoon, Mr. Bett.

Sean: Good afternoon.

Woman: Will you please state your name for the record?

Sean: Joshua Sean Bett.

Woman: Mr. Bett, what is your occupation?

Sean: I'm currently security with Johnny Depp.

Woman: And your current employer is Mr. Depp?

Sean: That's correct.

Woman: And how long have you been in private security?

Sean: Approximately just over 20 years.

Woman: Prior to working in private security, what were you doing professionally?

Sean: I was with the Los Angeles County Sheriff's Department.

Woman: And how long were you with the LA County Sheriff's Department?

Sean: Just over 14 years.

Woman: Over those 14 years, would you please describe for the jury your responsibilities in each position you held with the LA County Sheriff's Department?

Sean: Yes. I was assigned to custody division where we handled the intake and outtake of inmates. Then I was assigned to patrol division, where I was assigned to crime units where we did calls for service, proactive, reactive arrests. After that, I was assigned to gang details where we focus in saturated and certain areas within our district on gang shootings and things of that nature. Then after that, I was assigned to gang units, where I would perform search warrants and things of that nature. I worked with homicide, worked with special enforcement bureaus to combat a lot of the crime that was taking place in our area.

Woman: Did it come to a point where your employment with the Los Angeles Sheriff's Department came to an end?

Sean: It did.

Woman: And how did that come about?

Sean: I was in a couple of really bad traffic collisions, and during the course of duties, the County of Los Angeles issued what they call a medical retirement, or discharge. And so I was kind of forced out based on my injuries.

Woman: And after you left the Los Angeles Sheriff's Department, what did you do next?

Sean: I was doing some private investigations, and I also was doing security, estate security at various residences and offices, and working with different executives on certain details.

Woman: And when you were doing estate security, did you work with a certain clientele?

Sean: I did.

Woman: What type of clientele?

Sean: It ranged from CEOs, VPs of Fortune 500 companies, to certain types of celebrities, as well.

Woman: How did you come to be employed by Mr. Depp?

Sean: During the course of working estate security and the type of private security, you come in contact with a lot of other individuals in security companies, what we like to call networking. So, when you network with a lot of individuals, they call you from time to time to ask you if you're available to work certain days, weeks, events, and things of that nature. So I was asked by an individual if I wanted to work the

estate of Mr. Depp, and I of course said yes, on a part-time basis at the time.

Woman: And where is Mr. Depp's estate?

Sean: It's in West Hollywood, or it borders West Hollywood, in the city of LA.

Woman: And approximately what year was that?

Sean: That was at the end of either 2006, into the beginning of 2007, around that time.

Woman: And since 2006, 2007, have you been employed exclusively by Mr. Depp?

Sean: I have. I have done other work over the years on a part-time basis with other firms, but primarily within the last, I'd say, six to eight years, it's been with Mr. Depp and his family.

Woman: And would you please describe for the jury your general job responsibilities when you first started working for Mr. Depp?

Sean: It was mostly estate security. So we controlled the, you know, people that arrived at the estate. We were there to monitor the streets to make sure there were no overzealous fans or paparazzi that would hop fences or would try to sneak in bushes and take pictures of the family. It also entailed taking the kids or the kids' mother to school or shopping or out to dinner, and things of that nature.

Woman: And when you say "the kids," do you mean Mr. Depp's children?

Sean: I do.

Woman: And who was their mother?

Sean: Vanessa Paradis.

Woman: Based on your observations, Mr. Bett, would you please describe what it was like working for Mr. Depp in the beginning?

Sean: When I first met him...

Judge Azcarate: Oh, excuse me. Objection what, sir?

Man: Vague.

Judge Azcarate: What day? The foundation, I guess. What are we talking about, is that what you asked? Could you put your microphone on? I just...

Man: Vague foundation.

Judge Azcarate: Oh, vague.

Man: Also, just relevance.

Judge Azcarate: All right.

Man: What was it like working for him?

Judge Azcarate: What's the relevance?

Woman: The relevance is, Your Honor, just background just to understand...

Judge Azcarate: I'll sustain the objection. We can move on.

Woman: Okay. Over the years, Mr. Bett, has your responsibilities evolved over time as you've provided protection for Mr. Depp and his family?

Sean: It has.

Woman: And how so?

Sean: I started to travel a little bit more with him out of state, and then eventually out of the country, and worldwide.

Woman: Did your interactions with Mr. Depp also evolve from beginning to now?

Sean: They did. I was around him quite a bit when he was in town. In the very beginning of my employment with him, he was doing a lot of movies. He was out of the state. He was out of the country a lot. So once he was back in town, if I wasn't with his children, taking them around to school and so forth, I would be around Mr. Depp and provide, you know, security for him when he went out and about in public and so forth.

Woman: Would you please describe for the jury your general access to Mr. Depp while providing security for him?

Sean: I had access to him at any given time. He had an open-door policy. I had access to his residence, the inside, all the rooms at any given time in the event there was an emergency or anything like that.

Woman: And when traveling with Mr. Depp, was the access the same?

Sean: It was. I have access to his hotel room, again, if there's an emergency. You know, wherever he's at, I make sure, and it's mandatory, that I and other security personnel have access to him.

Woman: And would you please describe for the jury your current job responsibilities?

Sean: Basically to provide security for him and his wellbeing, albeit if he's in a hotel, a residence, or when he's out and about in public.

Woman: Has your job title changed from the beginning to now?

Sean: Yes, I primarily now just work with Mr. Depp, not so much with his children anymore. So I guess you could say, for a lack...for a term, you know, when we're in the United States, you know, I'm kind of his lead security guy.

Woman: Are there other members of Mr. Depp's security team?

Sean: There are.

Woman: And would you please name some of those security members?

Sean: That would be Malcom Connolly, who primarily does his European security, although he does come from the states from time to time. Leonard Damian, Mark Gibbs, Travis McGivern, Starling Jenkins.

Woman: Who is Jerry Judge?

Sean: Jerry Judge used to be his chief security individual. He was with him well over 20 years, I believe, and we lost him a few years ago to cancer.

Woman: Over the course of your employment with Mr. Depp, have you seen him consume alcohol?

Sean: I have.

Woman: How frequently?

Sean: It ranged. Sometimes I wouldn't see him drink at all, and there'd be other times he, you know, would have a glass of wine or two.

Woman: And based on your observations, how would you describe Mr. Depp's demeanor after drinking alcohol?

Sean: His demeanor is the same as if you were talking to him. I would joke around with some of the other security personnel, he's...you know. My terminology would be, he's kinda too cool for school. He goes into that kinda Jack Sparrow mode, and he just...you know, he's very likeable, you know, whether he drinks or he doesn't drink.

Woman: Based on your observations, have you ever seen Mr. Depp appear intoxicated?

Man: Objection, leading.

Judge Azcarate: Overruled. I'll allow it.

Sean: I've seen him slightly intoxicated.

Woman: And again, based on your observations, what is Mr. Depp's demeanor like when he appears slightly intoxicated?

Sean: It's the same as if he, you know, had a glass of sparkling water. I mean, he's just very low-key, he's easy to get along with, and you know, he just seems to me...I mean, he handles alcohol a lot better than I would.

Woman: And over the course of your employment with Mr. Depp, have you ever seen him consume drugs?

Sean: I haven't.

Woman: Are you generally aware that Mr. Depp has used drugs over the years?

Sean: I am.

Woman: And how are you aware of that?

Sean: From him.

Woman: Do you know who Ms. Heard is?

Sean: I do.

Woman: Who is Ms. Heard?

Sean: She is Mr. Depp's ex-spouse.

Woman: When did you first meet Ms. Heard?

Sean: It probably would have been around 2011, '12 maybe...maybe around 2010. It was some time ago.

Woman: And how did you first meet her?

Sean: She came over to his Hollywood estate.

Woman: And would you please describe for the jury some of your early interactions with Ms. Heard?

Sean: She was very pleasant, very easy to get along with. I mean, she was almost as if she was a next-door neighbor, just always had a smile to her face, and just, you know, no issues at the time. And, you know, I liked her, liked her a lot.

Woman: In the early days of Mr. Depp and Ms. Heard's relationship, did you have an opportunity to observe them together?

Sean: I did.

Woman: How frequently?

Sean: In the early stages, it was kind of on a part-time basis because a lot of times, you know, he was traveling or he was out of town working on films and so forth. But when they were in LA, I saw them quite frequently, which could have been the days that I worked, which varied anywhere between 4, 5, 6 days a week.

Woman: And based on what you observed of them together, how would you describe Ms. Heard's relationship with Mr. Depp when they first started seeing each other?

Judge Azcarate: Yes?

Man: Objection, foundation.

Judge Azcarate: All right, foundation?

Woman: Your Honor, I believe I've laid the foundation that he saw them frequently together when they first started dating.

Judge Azcarate: [inaudible 04:33:59]

Man: How he would describe their relationship is [inaudible 04:34:02] foundation.

Judge Azcarate: I'll sustain the objection. Next question.

Woman: After Mr. Depp and Ms. Heard started a romantic relationship, did you become familiar with any of Ms. Heard's family or friends?

Sean: I did.

Woman: Which ones?

Sean: Her sister Whitney Heard, her good friend Raquel, or Rocky Pennington, another friend, iO Tillett Wright, Miss Pennington's boyfriend at the time, Josh Drew.

Woman: And did you have an opportunity to observe Mr. Depp's interactions with Ms. Heard's family and friends?

Sean: I did.

Woman: And how would you generally describe their interactions?

Sean: He was very open and warm to them. He offered them, you know, whatever they needed. They were constantly coming around the estate. You know, eventually, he let a couple of them live in his penthouses downtown for free. He would let them, a few of them, drive his nice Dodge Challenger in and around town and take on trips.

Woman: Did you have an opportunity to observe how Ms. Heard's friends and families treated Mr. Depp?

Sean: I did. They were obviously very pleasant to him because, you know, I, from observing...they were taking advantage of him. So they were being obviously extra nice to the hand that feeds them, and that just progressed over a period of time.

Woman: How did Ms. Heard interact with you?

Judge Azcarate: Yes?

Man: Objection, relevance.

Judge Azcarate: All right. Its relevance?

Woman: It's just background, Your Honor. It's...

Judge Azcarate: I'll sustain the objection, and you can move on.

Woman: Okay. Were you ever present, Mr. Bett, for any conversations amongst Ms. Heard and her friends?

Sean: I was.

Woman: Can you describe any particular one that stands out to you?

Man: Objection, Your Honor. Leading calls for hearsay.

Judge Azcarate: All right.

Woman: Well, to the extent, Your Honor, we're offering Ms. Heard's statements. It's not hearsay.

Judge Azcarate: All right, if you can lay a foundation to that, [inaudible 04:36:26].

Woman: Do you recall any specific instances, Mr. Bett, where you heard Ms. Heard say something to her friends?

Sean: I do.

Woman: Okay. Can you describe one of those situations?

Sean: Yes. The first one, I was taking her from Mr. Depp's property to her apartment in the south end of the city, that I believe Mr. Depp was paying for. She was sitting next to me in the vehicle. She was talking to a girlfriend or a friend where they were talking about another male. And she says to the friend, girlfriend, whoever she was talking to, you know, "All men are idiots. You shouldn't trust that guy." And then she turned to me and she said, you know, "Sorry, Sean. Not you, I didn't mean that." And I just shrugged it off like it's not a big deal.

Woman: Do you remember approximately when that conversation took place?

Sean: I would say probably maybe 2012, or '13, perhaps. Perhaps even a little bit sooner than that. It was a long time ago.

Woman: And over the years of Ms. Heard's and Mr. Depp's relationships, did you have an opportunity to observe how the relationship evolved?

Sean: I did.

Man: Objection, foundation.

Judge Azcarate: Well, I'll just see what the next question is.

Woman: Thank you.

Judge Azcarate: That's fine.

Woman: Did you notice any changes in the relationship between Mr. Depp and Ms. Heard?

Man: Objection, vague, foundation, relevance, and leading.

Judge Azcarate: All right. Well, I'll allow it if you could get a timeline set in there, okay? Thank you.

Woman: Thank you, Your Honor. Did you notice any changes in the relationship between Mr. Depp and Ms. Heard after the initial stages of them beginning to engage in a romantic relationship?

Sean: I did.

Woman: And would you please describe those changes that you observed?

Sean: Well, I noticed they went from being that loving, almost like high school couple where they were very giddy towards each other. He was very happy. She was very happy too. They started to argue. They started to argue periodically, and then the arguing started to progress more and more and more. And it was always taking place because, you know, Ms. Heard would start this argument.

Woman: Did you ever observe Ms. Heard drink alcohol?

Sean: I did.

Woman: How often?

Sean: It just varied. There would be, you know, some days when I was working that I would see her. There would be other days I didn't see her. She was out of town working. So it just really depended on when she was around, and when she was around, for the most part, you know, she was drinking. You know, sometimes I'd see a glass in her hand, and sometimes I'd see her, you know, have two glasses, if I was in the presence of her and Mr. Depp, obviously.

Woman: Based on your observations, did it ever appear that Ms. Heard was intoxicated?

Sean: There were times when I went into the penthouse or we were at the Hollywood estate, and, you know, based on my training and experience in law enforcement, I could tell she was...

Man: Objection, Your Honor.

Sean: ...slightly intoxicated.

Judge Azcarate: Excuse me. [inaudible 04:39:38].

Man: That's kind of getting into the realm of expert testimony. He's not a designated expert.

Judge Azcarate: All right.

Woman: Perhaps we can have him answer the question without any citing to any experience in law enforcement, Mr. Bett.

Judge Azcarate: I'll just sustain the objection. Let's go to the next question.

Woman: Okay.

Judge: Azcarate: [inaudible 04:39:55]

Woman: Do you recall observing any arguments between Mr. Depp and Ms. Heard?

Sean: Several.

Woman: Can you tell the jury about one that comes to mind?

Sean: There was an incident. For example, I just happened to be on the floor of their penthouse, which is on the top floor of this building. I was outside by the pool area reading a book, and when I was walking back past their door, I could hear shouting, I could hear her voice shouting, you know, at a very high pitch. So I didn't rush in right away or anything, I just kinda stood by the door. He was, you know, speaking with her, and then the voices, you know, the shouting had dissipated. And then, you know, there was music playing, and then they started talking, so I kinda just stood by the door briefly, and then I went into another section of the penthouse floor.

Woman: Do you recall approximately the timeframe of that argument?

Sean: As far as the year, or how long it lasted?

Woman: I'm sorry. Thank you, Mr. Bett. The year.

Sean: That could have been perhaps 2012, 2013, maybe a little thereafter.

Woman: Did Ms. Heard ever confide in you about her relationship with Mr. Depp?

Sean: Briefly.

Woman: Do you recall her saying anything particular about her relationship with Mr. Depp?

Sean: Well, there was a couple occasions. There was one occasion in which they had an argument at his West Hollywood address. Johnny told me, you know, "Just take her downtown to the penthouse so she can relax and cool off." As we were driving downtown, you know, she

was crying. This was at the point when the arguing was taking place quite frequently. And I was telling her, you know, I said, "Amber, you know, this can't continue. You guys are either going to kill each other or you're going to be in jail." And, you know, with tears and everything, she says, "But I love him, and I'm not gonna lose him." And I says, "But you guys can't keep doing this." So we eventually got to the downtown apartments. You know, she said, "Thank you." I dropped her off, and then I went back to the West Hollywood address.

Woman: What did you mean by, you know, "This can't continue," when you told Ms. Heard that?

Sean: The constant arguing and bickering and so forth. Because, as I said, it was slowly progressing and, you know, it was just gonna turn out bad, eventually.

Woman: I believe you testified earlier that you observed many arguments between Mr. Depp and Ms. Heard. Do you recall anything that Ms. Heard said to Mr. Depp while they were arguing?

Sean: There was an incident. Because, as I said, the arguing progressed over and over as the years continued. He would text me when I was working saying, you know...

Man: Objection, Your Honor. Calls for hearsay.

Judge Azcarate: All right, I'll sustain that objection, if you wanna...

Woman: Mr. Bett, if you could just focus on what Ms. Heard, you overheard Ms. Heard say while observing arguments between Mr. Depp and Ms. Heard.

Sean: I overheard her saying to him, "He's a fat-ass. Fuck you, Johnny. And you too, Sean." At one time when, you know, she went to throw a water bottle or plastic cup down the stairs, and it bounced kinda in Johnny's direction, but I ended up getting him and we, you know, got out of there as soon as possible.

Woman: Did you ever see Ms. Heard throw anything other than a water bottle?

Sean: It was a water bottle or a coffee cup. It was something plastic.

Woman: Other than a water bottle or a plastic cup, did you ever see Ms. Heard throw anything else?

Sean: No, other than what he told me when she threw a broken bottle and sliced his finger and...

Man: [crosstalk 04:44:14]

Judge Azcarate: Sir...

Man: Sorry.

Judge Azcarate: Sustained objection. The jury will strike that testimony. Please just answer the question asked, and when there's an objection, do not speak, okay?

Sean: I'm sorry. I'm sorry.

Judge Azcarate: Thank you. Thank you.

Woman: After observing several arguments between Mr. Depp and Ms. Heard, what happened next?

Sean: As far as a timeframe? Well, as I said, the arguing, when it would continue, we would always...you know, I'd put him in the car, and we'd drive back to his West Hollywood address. At which point, it just depended on the week or the day or the month, you know, they would reconcile within hours, or it might take a day where he would stay overnight at his West Hollywood address. And then, you know, I would take him back the next day and, you know, they would reconcile by talking. And she would have, you know, candles lit or, you know, a bottle of wine open with glasses. And within certain evenings, you know, I'd get a text message from her, you know, asking me to go pick up dinner at local restaurants they frequented.

Woman: Did you ever see any violence between Ms. Heard and Mr. Depp?

Sean: No.

Woman: Other than the occasion when you saw Ms. Heard throw something plastic in Mr. Depp's direction, did you ever see Ms. Heard hit Mr. Depp?

Sean: No.

Woman: Did you ever see any physical injuries on Ms. Heard?

Sean: I didn't.

Woman: Did you ever see any physical injuries on Ms. Heard on occasions after Mr. Depp and Ms. Heard argued?

Man: Objection. Objection, Your Honor. Foundation.

Judge Azcarate: All right. You wanna lay a timeframe to that?

Woman: Absolutely.

Judge Azcarate: Sure.

Woman: On the occasions that you witnessed Ms. Heard and Mr. Depp argue, after that, did you ever see any physical injuries on Ms. Heard?

Man: That's the exact same question.

Judge Azcarate: That's the same question.

Woman: Okay.

Judge Azcarate: All right, move on. Okay.

Woman: At any point during Ms. Heard's and Mr. Depp's relationship, did you ever see any injuries on Ms. Heard?

Sean: No.

Woman: How about on Mr. Depp?

Sean: Yes.

Woman: When did you observe injuries on Mr. Depp?

Sean: The first time would have been around 2014, I guess, in which he had a...his finger was damaged from an incident in Australia.

Woman: Do you know how Mr. Depp's finger was damaged?

Man: Objection, foundation.

Judge Azcarate: Foundation?

Woman: It's just background, if he knows. I won't ask [crosstalk 04:47:23] question.

Judge Azcarate: I sustain the objection, unless he was in Australia and saw it himself.

Woman: Okay.

Judge Azcarate: Okay.

Woman: When else did you see injuries on Mr. Depp?

Sean: I saw another injury around, would have been March of 2015. He had a swollen, kinda, cheekbone, eyelid.

Woman: Your Honor, if I may please pull up a photograph, Exhibit number 146.

Judge Azcarate: Okay, just to the witness [inaudible 04:47:59]?

Woman: Just for the witness. Correct.

Judge Azcarate: Okay. I'm sorry, 146?

Woman: Yes. Thank you, Your Honor.

Judge Azcarate: Okay, thank you.

Woman: And that's plaintiff's, obviously.

Judge Azcarate: [crosstalk 04:48:07] 146.

Woman: Mr. Bett, do you recognize this photograph?

Sean: I do.

Woman: And how do you recognize it?

Sean: Because I took that picture.

Woman: Why did you take this photograph?

Sean: Well, we needed it as evidence in case Ms. Heard tried to make allegations towards Mr. Depp. I was emphatic with him, telling him, "That's a serious mark, and we need to photograph it."

Man: I'll just move to strike for foundation.

Judge Azcarate: I'll allow that answer. But that's... Thank you.

Woman: And when did you take this photograph?

Sean: It would have been around March of 2015.

Woman: Your Honor, we ask that this photograph please be published to the jury and admitted into evidence.

Judge Azcarate: Any objection to 146?

Man: No, Your Honor.

Judge Azcarate: All right, 146 in the evidence and be published to the jury. Thank you.

Woman: Mr. Bett, what does this photograph show?

Sean: It depicts a swollen upper left cheekbone with redness to it.

Woman: Thank you. Did you notice any other injuries on Mr. Depp?

Judge Azcarate: On that specific day, no.

Woman: Later in time, did you ever notice any other injuries on Mr. Depp?

Judge Azcarate: I did.

Woman: Can you please describe what you recall?

Sean: It was around December of that same year, 2015. He got into an argument with Ms. Heard, and she scratched him, and he had injuries...

Man: Objection, Your Honor.

Judge Azcarate: Sustain the objection. Only your observation, sir, what you saw.

Woman: Yeah.

Sean: Apologies.

Judge Azcarate: All right, thank you.

Woman: Mr. Bett, can you please describe the injury that you saw on Mr. Depp?

Sean: Yes, he had scratch marks around his nose area, I believe on one of the sides of his face, in the cheek area, and then on his forehead.

Woman: And if we could just have, just publish to the witness, plaintiff's Exhibit number 65.

Judge Azcarate: 65.

Woman: And Mr. Bett, this is a three-page document, so if I can have Mr. Arnold Blair please scroll down.

Sean: Okay. Okay, thank you.

Woman: Do you recognize these photographs?

Sean: I do.

Woman: And how do you recognize them?

Sean: Because I took 'em.

Woman: When did you take them?

Sean: December, mid-December 15th.

Woman: And why did you take these photographs?

Sean: I took 'em to show proof that he once again had injuries sustained in an altercation.

Woman: Your Honor, we'll move to publish these photographs to the jury and for admittance.

Judge Azcarate: All right, any objection to 65?

Man: No, Your Honor.

Judge Azcarate: All right, 65 in evidence, and it can be published.

Woman: And Mr. Bett, would you please describe what we're looking at here?

Sean: The first picture, there's a laceration on the left side of his nose. It looks like the left upper cheek has a slight bruise to it. And then on his forehead, right above the ridge line, just almost to the center, it looks like there's a red scratch mark above his left eye and to the right.

Woman: Do you see that in the same subsequent pictures in page 2?

Sean: Okay, page 2, I see a scratch mark, a vertical scratch mark adjacent to his right ear, on the right side of his face.

Woman: Same question for page 3.

Sean: Page 3, there's a scratch mark on the lower right portion of his chin. There's that same scratch mark on the center left side of his nose, and you can see the frontal portion of that bruise. It's on the left side under his eye.

Woman: Were you surprised to see Mr. Depp with these injuries?

Man: Objection, leading.

Judge Azcarate: I'll sustain, it's a leading.

Woman: Did you ever see any similar injuries on Ms. Heard?

Sean: None.

Woman: Did you ever see any injuries on Ms. Heard?

Sean: I didn't.

Woman: Did Ms. Heard ever tell you she was being abused by Mr. Depp?

Sean: She didn't.

Woman: Did she ever ask you for help?

Sean: No.

Woman: Did you ever see any evidence that Ms. Heard was being abused by Mr. Depp?

Sean: I didn't.

Woman: Turning to April 21st, 2016, Mr. Betts, do you remember anything about that day?

Sean: Yes, that was the day or evening that Ms. Heard was celebrating her birthday with some friends.

Woman: Do you recall what birthday Ms. Heard was celebrating?

Sean: I'm sorry?

Woman: Do you recall what birthday Ms. Heard was celebrating?

Sean: I believe it was her 29th...29th or 30th.

Man: Your Honor, if we may, can we just remove the exhibits?

Judge Azcarate: Oh yeah.

Man: Thank you.

Judge Azcarate: Sorry. Thank you.

Woman: Other than Ms. Heard's birthday celebration that evening, do you recall anything else about April 21st, 2016?

Sean: He had a meeting that afternoon, which extended into the evening. And that was, as I said, the night of her birthday party, where they got into another argument, and she had struck him in the face.

Judge Azcarate: All right, I'll...

Man: Objection. Move to strike, Your Honor.

Judge Azcarate: Sir, if you didn't see it, you can't testify to it, correct?

Sean: Correct.

Judge Azcarate: All right, thank you.

Woman: Thank you, Your Honor.

Judge Azcarate: The jury will strike that answer. Thank you.

Woman: Thank you, Your Honor.

Man: Thank you.

Woman: Were you with Mr. Depp when he attended the meeting that you mentioned earlier?

Sean: I was.

Woman: Okay. And if you know, who was that meeting with?

Sean: It was with his accountant.

Woman: And who is Mr. Depp's accountant?

Sean: Ed White.

Woman: And where did that meeting take place?

Sean: It took place at his old production office in the Los Angeles area.

Woman: What happened after the meeting ended?

Sean: When the meeting ended, we drove to his West Hollywood address, which might have been maybe 5, 10 minutes away. He had to go inside the house and retrieve something. I don't know what it was. We were only there a short period of time. And we were kinda rushing because, you know, we had been running late, because it was her birthday dinner. And then we eventually left thereafter and headed back down to the penthouses downtown Los Angeles.

Woman: And how would you describe Mr. Depp's demeanor after the meeting ended with Mr. White?

Sean: To me, he looked fine. You could tell he was in a hurry, and he was, you know, telling me, "Okay, we gotta hurry up and go to the house real quick before we go downtown." But other than that, he appeared fine to me.

Woman: And based on your observations, Mr. Bett, did Mr. Depp appear to you to be intoxicated?

Sean: He didn't.

Woman: I believe you testified that after you left the meeting, you went to Mr. Depp's home, his residence in West Hollywood, and then on to the Eastern Columbia building. Is that correct?

Sean: That's correct.

Woman: Okay. What happened after you arrived at the penthouses for Ms. Heard's birthday dinner?

Sean: We went upstairs, and she was having a dinner with her friends in one of the penthouses, I believe it was penthouse number 5. We entered the front door to that penthouse. Amber stood up. She walked towards Mr. Depp. She had a look of, you know...you could tell she was upset at the fact that he was late, you know. Mr. Depp apologized to everybody, apologized to Amber and, you know, told her, you know, "Sorry, baby," or words to that effect, "for being late." She gave him a hug and a kiss and said, you know, "Come sit down, suga."

Woman: Was that a nickname, a common nickname Ms. Heard used for Mr. Depp?

Sean: Yes, she used to call him that quite frequently in front of me.

Woman: Approximately what time did you arrive to the Eastern Columbia building?

Sean: It would have been somewhere between maybe 9:00 and 10:00 in the evening.

Woman: Do you know what time the birthday dinner for Ms. Heard was scheduled to start?

Sean: I can't remember the exact time.

Woman: Do you recall how late you and Mr. Depp were to the birthday dinner?

Sean: I knew we were running behind, but as I said, I didn't know actually what time the dinner was starting.

Woman: And once you arrived at the penthouses at the Eastern Columbia building, did you go inside?

Sean: Briefly. I had a couple of Mr. Depp's computer bags and bags with me, and I just set 'em down in the corner, and then I exited thereafter.

Woman: How long did you stay at the Eastern Columbia building after exiting the penthouse?

Sean: I was probably there, perhaps, maybe another hour or two. And then I would have been relieved by the night shift security personnel, Travis McGivern.

Woman: Did you happen to work the next day on April 22nd, 2016?

Sean: I didn't.

Woman: Where did you start working on that day?

Sean: On that day, I started...I drove to his West Hollywood address because Mr. McGivern had sent me a text message stating they had an argument, and...

Man: Objection, hearsay.

Judge Azcarate: All right. I'll sustain as to hearsay.

Woman: Why did you start your shift at the Sweetzer property, or Mr. Depp's West Hollywood property, as opposed to the Eastern Columbia building?

Sean: Because that's where Mr. Depp was at the time.

Woman: Do you recall anything specific about that day, April 22nd, 2016?

Sean: Just he had told me they had a...

Man: Objection, hearsay.

Judge Azcarate: I'll sustain objection. You cannot say what he told you, sir.

Sean: Sorry.

Judge: Azcarate: I'm sure you've testified before, correct?

Sean: I have [crosstalk 05:00:10].

Judge Azcarate: Yes, thank you.

Woman: Did you see Mr. Depp when you arrived to his West Hollywood home on April 22nd, 2016?

Sean: I did.

Woman: Did you observe any injuries on Mr. Depp?

Sean: I didn't.

Woman: In this timeframe of April 2016, do you recall Mr. Depp's mother having any health problems?

Sean: Yes.

Woman: What do you recall about her health problems?

Sean: At that time, she was very critical. She had been suffering from cancer for some time, a few years, I believe. And at that stage, she was slowly deteriorating. So it was approximately a month before she passed.

Woman: Do you recall when she passed away?

Sean: I believe it was around May 20th, 19th.

Woman: And how did you learn that she had passed away?

Sean: Mr. Depp told me.

Woman: And again, based on your observations, how would you describe Mr. Depp's demeanor when he informed you that his mother had passed away?

Sean: Well, he just lost his mother, so he was, you know...you could tell he was, you know, very sad, and he was mourning. And so I just left him alone until he needed me for whatever I had to do for him that day.

Woman: And to your knowledge, Mr. Bett, when was the next time Mr. Depp saw Ms. Heard?

Sean: Maybe a month later, some time in May.

Woman: I'm sorry, was that a month after the birthday dinner on April 21st, 2016?

Man: Objection, leading.

Judge Azcarate: I'll sustain as to leading.

Woman: To your knowledge, after April 21st, 2016, when did Mr. Depp next see Ms. Heard?

Sean: In my presence, he would have seen her May 21st.

Woman: And was that after Mr. Depp's mother passed away?

Sean: Correct. That would have been a day after she passed.

Woman: I have approximately 10, 15 minutes left.

Judge Azcarate: I'll let you finish. If that's okay with the jury, we'll finish at least a direct.

Woman: Okay, thank you.

Judge Azcarate: That's fine.

Woman: Turning to May 21st, 2016, please tell us what you remember about that day.

Sean: That day, we were at his West Hollywood address, Jerry Judge, his chief security guard, was with me and with us at the estate at the time. Later on in that evening, Mr. Depp told us that he wanted to go down and retrieve some items from the penthouse, and he also wanted to talk briefly with Ms. Heard.

Man: Objection, hearsay, Your Honor.

Judge Azcarate: All right.

Woman: It's just to establish...

Judge Azcarate: All right. He wanted to talk to Ms. Heard, that's fine. We'll leave it at that. Next question.

Man: Thank you, Your Honor.

Woman: Thank you. So you were working on May 21st, is that right?

Sean: I was.

Woman: Okay. Did you end up taking Mr. Depp to the penthouses at Eastern Columbia building?

Sean: I did, and Mr. Judge was along with me as well.

Woman: And do you remember approximately what time you arrived at the penthouses?

Sean: It would have been some time after 7:30, maybe 7:45, 7:15, around that timeframe.

Woman: And was that in the evening?

Sean: It was.

Woman: Did you enter the penthouses with Mr. Depp?

Sean: I did, myself and Jerry Judge and Mr. Depp.

Woman: And what did you see when you first entered the penthouse?

Sean: When we first walked in, on the center island in the kitchen, there were candles lit on the table, there was a couple wine glasses, they were empty, and there was a bottle of wine that was open. There was also music playing in the background through the speakers that were in the wall.

Woman: Did you see Ms. Heard when you first entered the penthouse?

Sean: I did.

Woman: What happened after you entered the penthouses?

Sean: After we entered the penthouses, Jerry Judge told Johnny that myself and...

Judge Azcarate: Yes?

Man: Objection, hearsay. [inaudible 05:05:07].

Judge Azcarate: All right, I'll sustain the objection. All right, next question.

Woman: Okay. Did you stay inside the penthouse with Mr. Judge and Mr. Depp?

Sean: No. Shortly thereafter, Mr. Judge and I exited the penthouse and stood outside the door, briefly.

Woman: How long would you estimate that you stood outside the door of the penthouse?

Sean: It would have been approximately maybe 10 minutes, maybe a little bit more or a little bit less.

Woman: And after standing outside the penthouse for 10 minutes, give or take, where did you go next?

Sean: We walked down the hallway to penthouse number 5. Penthouse number 5 has two doors. There's a main entrance that takes you into the living room. Next to it, around the corner, it's a continuation of the penthouse, which is like a storage area. It also had a couch at the time

and a TV for the security personnel. So once we were at the penthouses, we could go in there, have lunch or dinner, or watch a little bit of TV. And then, you know, whenever Mr. Depp or Ms. Heard would leave, and I'd have to drive or the other security personnel, we would get a text, or they would come and knock on the door, and we would leave.

Woman: And when you first arrived to the penthouses with Mr. Depp, based on your observations, was he drinking?

Sean: He had had some glasses of wine at the meeting he was at with his accountant.

Woman: Apologies, Mr. Bett. I meant on May 21st, 2016.

Sean: Oh, I'm sorry. I'm sorry.

Woman: Did you observe Mr. Depp drinking any alcohol that day?

Sean: He might have had a glass of wine in the car, but as far as the entire day, I wouldn't have known how much he drank.

Woman: Did he appear intoxicated to you when he arrived to the Eastern Columbia building?

Sean: No.

Woman: So you went to the storage area of the penthouse area. How long were you there?

Sean: We might have been there maybe 10 minutes, 5 minutes. We got something to drink, and then we exited that, you know, penthouse I described, or that penthouse storage area.

Woman: And where did you go next?

Sean: We walked down the hall towards Mr. Depp's penthouse, which would have been penthouse number 3.

Woman: And did you stand outside the door, or did you go in?

Sean: As we approached the door, we could hear the screaming and shouting from Ms. Heard, so I immediately opened up the door, and Mr. Judge and I ran in there.

Woman: What do you remember Ms. Heard screaming or shouting?

Sean: It appeared she was shouting profanities. So once Mr. Judge and I went through the front door, Mr. Depp would have been standing directly in front of us, maybe about 20 feet, because parallel to us,

walking in or running in, there was a wall. The way the kitchen was set up, it was almost like an L shape. So you walk in, and then you have to make a left. So Mr. Depp would have been standing in front of us, and he glanced at us. As soon as Mr. Judge and I rounded the corner, I saw Ms. Heard standing next to her good friend Raquel Pennington.

Woman: And how was Ms. Heard standing? Where were her hands?

Sean: Her hands would have been in this motion. Once Mr. Judge and I rounded that corner and she saw both Jerry and I, she had this look of surprise on her face, and then she looked at Mr. Depp and us, and she shouted out loud, "This is the last time you do this to me." At which point, Mr. Depp looked at her and said, "What the hell are you talking about?" At that point, Mr. Judge tapped Mr. Depp on the arm and told him, "Boss, let's leave." So we gathered...there was a couple of computer bags that was right on a table, and we exited the front door to penthouse number 3.

Woman: Based on your observations, did you have a clear view of Ms. Heard?

Sean: I did.

Woman: Did you have a clear view of her face?

Sean: I did.

Woman: Did you observe any injuries on Ms. Heard's face?

Sean: I didn't.

Woman: Did you see any redness?

Sean: I didn't.

Woman: Swelling?

Sean: None.

Woman: Was Ms. Heard holding her face?

Sean: She wasn't.

Woman: So what happened next?

Sean: We exited penthouse number 3, and we walked down the hallway. Right when we were getting close to penthouse number 5 door, Mr. Depp says, "I need to get in here and look for something." So I opened up the door for him. We went inside, and that's when I saw Ms. Heard's

friend Raquel Pennington's boyfriend, Josh Drew, and another unknown female that I'd never seen before. And there was a small dog kinda walking around. Mr. Depp, I believe he said, "Get the fuck out of my apartment." So Mr. Drew nodded his head and basically said, "Okay." The female picked up the dog, and they exited the front door to that penthouse.

Woman: What did Mr. Depp do next?

Sean: He was walking around the kitchen area, living room area. He might have gone upstairs briefly. I can't remember. I don't know what he was looking for. I didn't ask him. Mr. Judge didn't ask him. Eventually, he didn't find whatever he was looking for, and we exited penthouse number 3.

Woman: And while Mr. Depp was in penthouse number 3, did you observe him cause any damage?

Sean: No.

Woman: Did you observe him cause any damage do any of the penthouses on May 21st, 2016?

Sean: No.

Woman: Did you see Mr. Depp become violent with anyone while at the penthouses on May 21st. 2016?

Man: Objection, leading.

Judge Azcarate: I'll allow it. That's fine.

Sean: I didn't.

Woman: Mr. Bett, have you ever seen Mr. Depp become violent with Ms. Heard?

Sean: I haven't.

Woman: Thank you. I have nothing further, Your Honor.

Judge Azcarate: All right. You can stay right there, sir. All right, ladies and gentlemen, that concludes the testimony for today, so I'll release you. We'll be back here at 10:00 a.m. tomorrow. Please have a safe, quiet night. Please take care of yourself. Take your vitamins. We need you. And we will see you in the morning. Don't talk to anybody, and don't do any outside research, okay? All right, thank you. And Mr. Bett, since

you're still in the middle of your testimony, you cannot talk to the attorneys or Mr. Depp about your testimony or about this case, okay?

Sean: I understand.

Judge Azcarate: All right. And we'll see you tomorrow at 10:00 a.m. Okay, sir?

Sean: All right. Thank you, ma'am.

Judge Azcarate: Thank you. You're released. All right. Anything else for this evening?

Man: Yes, Your Honor, just wanted a point of clarification.

Judge Azcarate: Okay, sure. Go ahead.

Man: Well, perhaps we should approach.

Judge Azcarate: [crosstalk 05:13:02] approach? Okay, sure.