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Transcript of Christian Carino

Date: January 19, 2021

Case: Depp, II -v- Heard

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1 **were referring to?** 12:42:47

2 A **No, I don't think I was referring to any** 12:42:47

3 **one litigation. I think there were multiple** 12:42:50

4 **litigations happening at that time.** 12:42:52

5 Q And why did you feel that way? 12:42:54

6 MR. PRESIADO: Objection; vague; 12:43:02

7 ambiguous. 12:43:06

8 A I don't know how to answer that, Elaine. 12:43:07

9 Q If you expressed to Mr. Waldman that the 12:43:09

10 sooner the litigation was over the better for 12:43:11

11 Mr. Depp, what were you thinking when you said 12:43:14

12 that? Why did you think that? 12:43:17

13 A **I think anytime somebody is in litigation** 12:43:21

14 **publicly, it is at a minimum a distraction to that** 12:43:26

15 **person's career. And in a lot of cases it's -- it** 12:43:32

16 **negatively impacts that person because there's** 12:43:41

17 **attention drawn to them that is outside of what** 12:43:45

18 **people want to know about that person.** 12:43:52

19 Q And what do you mean by it distracts from 12:43:54

20 their career? 12:44:03

21 A I mean that -- with somebody who is well 12:44:05

22 known, people don't want to hear they're in a 12:44:14

1 lawsuit with anybody about anything. 12:44:20

2 Q Why not? 12:44:24

3 A Because that's just not what they want to 12:44:27

4 know or hear news about people. 12:44:32

5 Q And why do you believe that? 12:44:37

6 A Based on my experience in this world for 12:44:45

7 the past 16 years. 12:44:55

8 Q And when you say it negatively impacts, 12:45:00

9 what do you mean by that? 12:45:04

10 A People don't want to hear that the people 12:45:07

11 that they look up to are in litigation. 12:45:11

12 Q Do you also believe that that impacts 12:45:15

13 career decisions by producers, directors, 12:45:24

14 companies, brands, things -- 12:45:27

15 A Yes. 12:45:27

16 Q -- of that nature? 12:45:29

17 A Yes. 12:45:30

18 Q And in -- in what way? 12:45:30

19 A Because the general public doesn't want to 12:45:36

20 hear that people that they look up to are in 12:45:40

21 litigation. And when it -- the more oxygen it 12:45:43

22 takes up in the overall news or coverage of an 12:45:48

1 **individual, and the less focused it is on that** 12:45:57
2 **person's career, the less interested studios,** 12:46:02
3 **brands, the general public becomes in that person.** 12:46:07
4 Q **And therefore less opportunities?** 12:46:13
5 A **Yes.** 12:46:23
6 Q When you expressed to Adam Waldman that -- 12:46:23
7 your opinion that the sooner the litigation was 12:46:29
8 over for Mr. Depp the better, what did Mr. Waldman 12:46:31
9 say? 12:46:35
10 MR. PRESIADO: Objection; hearsay. 12:46:36
11 A To be honest, I don't recall exactly what 12:46:40
12 he said, but something to -- something like we're 12:46:44
13 going to get this over with as fast as we can. 12:46:53
14 Q Do you remember which litigations were 12:46:58
15 ongoing at the time you had this discussion with 12:47:09
16 Mr. Waldman? 12:47:13
17 A I do not. 12:47:13
18 MR. PRESIADO: Objection; lacks 12:47:15
19 foundation. 12:47:18
20 Q I'm going to ask you -- 12:47:18
21 MS. BREDEHOFT: Alex, could you please 12:47:24
22 bring up No. 4, Carino No. 4. 12:47:27

1 all right, we'll keep it labeled four. 12:48:44

2 Q Do you -- this is the lawsuit that was 12:48:48

3 brought by Mr. Depp and Edward White against The 12:48:50

4 Mandel Company; do you recall that particular 12:48:57

5 lawsuit? 12:48:59

6 A Yes. 12:49:01

7 Q Okay. And was it your understanding that 12:49:01

8 this was litigation that was brought in connection 12:49:06

9 with The Mandel Company having served as the 12:49:10

10 management company for Mr. Depp for a number of 12:49:15

11 years -- business reasons? 12:49:18

12 A Yes. 12:49:21

13 MR. PRESIADO: Objection; lacks 12:49:21

14 foundation; compound. 12:49:25

15 Q What was your understanding of the nature 12:49:26

16 of this litigation? 12:49:28

17 MR. PRESIADO: Objection; lacks 12:49:29

18 foundation. 12:49:30

19 A I really don't have much of an 12:49:30

20 understanding of the specifics outside of the -- 12:49:32

21 the general accusation that his business managers 12:49:38

22 acted in a way that was illegal in how they 12:49:48

1 (Requested portion read back.) 13:47:07

2 A Elaine, are you asking me if I'm aware if 13:47:07

3 the Jake Bloom litigation was made public? 13:47:11

4 Q Yes. 13:47:15

5 A Yes. 13:47:15

6 Q And in addition to being made public, do 13:47:15

7 you recall whether there was publicity surrounding 13:47:19

8 the Jake Bloom litigation? 13:47:24

9 A Yes. 13:47:26

10 MR. PRESIADO: Objection; vague and 13:47:26

11 ambiguous. 13:47:27

12 Q **And do you recall whether there was** 13:47:27

13 **publicity surrounding the Mandel litigation?** 13:47:29

14 A **Yes.** 13:47:32

15 Q **And would you agree that that publicity** 13:47:32

16 **contributed to the oxygen that you were referring** 13:47:39

17 **to that takes up space and distracts from -- may** 13:47:44

18 **negatively impact an actor's career?** 13:47:53

19 MR. PRESIADO: Objection; assumes facts 13:47:58

20 not in evidence; calls for speculation. 13:48:03

21 MR. DERIN: Join. 13:48:03

22 THE WITNESS: Greg? 13:48:05

1 MR. DERIN: I joined in the objection. To 13:48:07
2 the extent you can answer it, answer as you will. 13:48:10
3 A Elaine, I guess I would just go back to 13:48:12
4 what I said, in my personal opinion, media 13:48:15
5 coverage of any litigation -- sorry -- media 13:48:22
6 litigation coverage is negative. 13:48:31
7 Q So any media coverage of the Bloom 13:48:33
8 litigation or the Mandel litigation would be 13:48:44
9 negative, correct? 13:48:48
10 A In my opinion, yes. 13:48:49
11 Q And that's based on your years as a talent 13:48:51
12 agent in the industry? 13:48:57
13 A Yes, and just being a human being. That's 13:48:59
14 my opinion. 13:49:04
15 Q And so would you agree that the publicity 13:49:05
16 surrounding the litigation, the Jake Bloom 13:49:12
17 litigation and the Mandel litigation would have a 13:49:14
18 negative impact on Mr. Depp's reputation and 13:49:16
19 career? 13:49:22
20 A Didn't you already ask me that? 13:49:22
21 Q Not exactly that question. 13:49:24
22 A Say it again. 13:49:27

1 off-screen reputation was impacted by the 15:34:08
2 accusations included in the Waldman tweet on 15:34:12
3 May 2020 of the op-ed? 15:34:19
4 A No. 15:34:20
5 Q Are you aware of any role or opportunity 15:34:20
6 that Mr. Depp lost as a result of the op-ed by Dan 15:34:29
7 Wootton in The Sun? 15:34:38
8 A No. 15:34:41
9 Q Are you aware of any role or -- and when I 15:34:41
10 say an opportunity, any kind of business 15:34:44
11 opportunity that Mr. Depp lost as a result of the 15:34:47
12 particulars of claim that Mr. Depp filed? 15:34:49
13 A No. 15:34:54
14 MR. PRESIADO: Objection; vague and 15:34:54
15 ambiguous. 15:34:57
16 Q Are you aware of any role or business 15:34:57
17 opportunities that Mr. Depp lost as a result of 15:35:00
18 the op-ed by Amber Heard in The Washington Post? 15:35:04
19 A No. 15:35:09
20 MR. PRESIADO: Objection; vague and 15:35:09
21 ambiguous. 15:35:14
22 Q I'm sorry, I didn't hear your answer. 15:35:14

1 A I said no. 15:35:15

2 Q Okay. Thank you. Are you aware of any 15:35:16

3 roles or business opportunities that Mr. Depp lost 15:35:18

4 as a result of the Waldman tweet from May 2020 15:35:23

5 relating to Amber's op-ed? 15:35:28

6 A No. 15:35:33

7 MR. PRESIADO: Objection; vague and 15:35:34

8 ambiguous; lacks foundation. 15:35:36

9 Q Other than the two that you've testified 15:35:36

10 to, I believe it was the Grindelwald role and then 15:35:38

11 the one for Houdini, are you aware of any other 15:35:43

12 roles or business opportunities that Mr. Depp has 15:35:48

13 lost as a result of the UK decision on 15:35:53

14 November 2, 2020? 15:35:57

15 MR. DERIN: Objection; misstates his 15:35:59

16 testimony. 15:36:01

17 MR. PRESIADO: Join. 15:36:01

18 THE WITNESS: Greg? 15:36:05

19 MR. DERIN: Answer the question. 15:36:07

20 A No. 15:36:12

21 Q And because we have an interesting 15:36:12

22 objection there, I have to go back and I apologize 15:36:17

1 for this. 15:36:19

2 **Was it your understanding as a result of** 15:36:21

3 **the UK decision that Mr. Depp was asked to step** 15:36:25

4 **down from his role as Grindelwald in Fantastic** 15:36:30

5 **Beasts 3?** 15:36:44

6 MR. PRESIADO: Objection; vague and 15:36:44

7 ambiguous. 15:36:46

8 A Paul, can you reread the first half of 15:36:46

9 Elaine's question? 15:36:49

10 (Requested portion read back.) 15:36:50

11 A **Yes.** 15:37:07

12 Q **And was it your understanding that as a** 15:37:07

13 **result of the UK decision that Mr. Depp lost the** 15:37:10

14 **opportunity to star in and be an executive** 15:37:16

15 **producer of the Houdini TV project?** 15:37:23

16 A **Yes.** 15:37:30

17 Q Is there any other role or business 15:37:30

18 opportunity that Mr. Depp has lost since you 15:37:32

19 started representing him in October 2016? And I'm 15:37:40

20 saying -- 15:37:48

21 MR. PRESIADO: Objection; vague and 15:37:49

22 ambiguous; lacks foundation. 15:37:49

1 (Requested portion read back.) 16:47:31

2 MR. DERIN: Thank you. 16:47:49

3 MR. PRESIADO: Same objection. 16:47:49

4 A My efforts were probably primarily around 16:47:54

5 Houdini, which at one point was a film, but other 16:47:58

6 people at CAA for sure did, yes. 16:48:02

7 Q And who were they? 16:48:05

8 A I would start with Jack Whigham. 16:48:10

9 **MR. PRESIADO: Elaine, let me -- Elaine,** 16:48:15

10 **if I can interrupt here. Based on my timing, your** 16:48:16

11 **time is up with respect to this deposition. I** 16:48:19

12 **think it's been three and a half hours on the** 16:48:21

13 **record of your questioning.** 16:48:23

14 MS. BREDEHOFT: No, not correct. I am 16:48:25

15 entitled to up to seven hours of deposition. You 16:48:28

16 can't -- 16:48:32

17 MR. PRESIADO: That's not true. 16:48:32

18 MS. BREDEHOFT: -- cut it in half. 16:48:34

19 MR. PRESIADO: That's not true. 16:48:37

20 MS. BREDEHOFT: That is true. 16:48:37

21 **MR. PRESIADO: Actually pursuant to CCP** 16:48:38

22 **Section 2025.290A, a third-party witness is only** 16:48:40

1 **required to sit for seven hours total.** 16:48:45

2 MS. BREDEHOFT: Right. 16:48:48

3 **MR. PRESIADO: Because we** 16:48:49

4 **cross-designated, we're entitled to as much time** 16:48:51

5 **as you are, so half of seven hours is three and a** 16:48:53

6 **half hours. And you've completed three and a half** 16:48:56

7 **hours on the record, so now it's our turn.** 16:48:58

8 MS. BREDEHOFT: I don't agree to that and 16:49:02

9 I'm not going to -- 16:49:03

10 **MR. PRESIADO: Well, it doesn't matter --** 16:49:03

11 **it doesn't matter if you agree with it, that's the** 16:49:03

12 **law, Elaine. So it's my turn to start asking** 16:49:05

13 **questions now.** 16:49:09

14 MS. BREDEHOFT: I do not agree with that, 16:49:10

15 and I am not going to stop asking questions. I'm 16:49:12

16 entitled up to seven hours. I don't intend to 16:49:14

17 take seven hours. You don't get to split with me 16:49:18

18 because you do a cross designation. 16:49:19

19 MR. PRESIADO: Well, we need to meet and 16:49:21

20 confer on this. Would you like to take a look at 16:49:23

21 the statute that says that? 16:49:25

22 MS. BREDEHOFT: The statute that says 16:49:26

1 what? 16:49:29

2 MR. PRESIADO: You agree that this is a 16:49:29

3 California subpoena that Mr. Carino's -- 16:49:32

4 MS. BREDEHOFT: No -- 16:49:35

5 MR. PRESIADO: -- appearing under? 16:49:35

6 MS. BREDEHOFT: No, it's a Virginia 16:49:35

7 subpoena. 16:49:37

8 MR. PRESIADO: And we're operating -- 16:49:38

9 MS. BREDEHOFT: Virginia -- 16:49:39

10 MR. PRESIADO: We're operating -- 16:49:39

11 MS. BREDEHOFT: -- doesn't even have a -- 16:49:40

12 MR. PRESIADO: We're operating -- 16:49:40

13 MS. BREDEHOFT: -- time limit. And 16:49:41

14 then -- 16:49:42

15 MR. PRESIADO: We're operating under 16:49:42

16 California law. 16:49:43

17 MS. BREDEHOFT: -- we're just talking over 16:49:43

18 each other. I'm just going to continue on. You 16:49:45

19 can -- you can preserve your objection, but I 16:49:48

20 fully intend to continue this deposition. 16:49:50

21 **MR. PRESIADO: Well, Elaine, you can't do** 16:49:52

22 **that. That is not** -- 16:49:54

1 MS. BREDEHOFT: I can. 16:49:54

2 **MR. PRESTIADO: -- permitted under the** 16:49:56

3 **code. You're eating it into my time -- you're** 16:49:56

4 **eating into our time now.** 16:50:01

5 MR. DERIN: Hang on for a second. 16:50:02

6 Mr. Carino are going to disappear for the next 16:50:08

7 five minutes. The two of you can talk. All I can 16:50:10

8 tell you is that Mr. Carino is not going to come 16:50:13

9 back for another day deposition. And you guys can 16:50:16

10 argue -- 16:50:18

11 MR. PRESIADO: And that's exactly my 16:50:18

12 point. 16:50:19

13 MR. DERIN: Okay. 16:50:19

14 MR. PRESIADO: And that's exactly my 16:50:19

15 point. He's not required to. 16:50:20

16 MR. DERIN: Well, you guys can work it out 16:50:22

17 and we're going to go off for a couple of minutes 16:50:27

18 so Mr. Carino doesn't have to listen to this. 16:50:30

19 MR. PRESIADO: Understood. 16:50:30

20 MS. BREDEHOFT: That's fair. Okay. 16:50:34

21 THE VIDEOGRAPHER: So it is 4:50 p.m. We 16:50:34

22 go off the record. 16:50:39

1 (Off the record from 4:50 p.m. to 5:23 16:51:06
2 p.m.) 17:23:38
3 **MR. PRESIADO:** This is Leo Presiado back 17:23:38
4 on the record. The parties have a dispute with 17:23:41
5 respect to the amount of time that Ms. Bredehoft 17:23:44
6 had with the witness. **Our contention is,** 17:23:49
7 **plaintiff's contention is that because of the rule** 17:23:52
8 **that provides only seven hours for third-party** 17:23:54
9 **witnesses that she was entitled to three and a** 17:23:59
10 **half hours, and that's concluded, and now we're** 17:24:01
11 **entitled to our three and a half hours.** 17:24:04
12 **Not only is that set forth in the code,** 17:24:06
13 **but it's also the agreement of the parties as** 17:24:08
14 **indicated in previous transcripts. And it was** 17:24:11
15 **also confirmed by a fairly recent email from** 17:24:16
16 **Mr. Moniz in my office.** We are trying to schedule 17:24:17
17 a IDC, informal discovery conference with Judge 17:24:23
18 Boick. Her clerk has indicated that she's most 17:24:27
19 likely available at 3:00. It's now 2:24 p.m., so 17:24:30
20 the parties have decided and Mr. Derin, counsel 17:24:33
21 for the witness, has agreed that we will conclude 17:24:34
22 this deposition for today, subject to the judge's 17:24:39

1 it was deceptive, and I'm very, very troubled by 17:26:52
2 the manner in which this was handled. 17:26:55
3 Mr. Derin, I apologize to you. Because I 17:26:58
4 am not familiar with this rule. I did call our 17:27:01
5 counsel, the lead partner in California who said 17:27:01
6 he's taken thousands of depositions and never 17:27:05
7 heard of such a rule or an agreement or policy. 17:27:06
8 And I apologize because Mr. Carino should have 17:27:11
9 been able to be finished today, and I would have 17:27:14
10 been happy to work with the other side for a 17:27:16
11 reasonable accommodation of that, but obviously 17:27:18
12 did not have any notice whatsoever of that until 17:27:21
13 they say, oh, by the way, your 3.5 is up. And I 17:27:24
14 think that's just outrageous tactics. So I'm 17:27:27
15 sorry -- 17:27:31
16 **MR. PRESTADO: I just want to address the** 17:27:32
17 **deception part. There's no deception here,** 17:27:35
18 **Elaine. I work under the presumption that counsel** 17:27:37
19 **knows the rules. I work under the presumption** 17:27:40
20 **that counsel knows the agreements reached between** 17:27:41
21 **the parties even prior to them becoming counsel.** 17:27:44
22 You heard me ask for the timing of you on the 17:27:47

1 CERTIFICATE OF SHORTHAND REPORTER-NOTARY PUBLIC

2 I, PAUL P. SMAKULA, the officer before whom
3 the foregoing deposition was taken, do hereby
4 certify that the foregoing transcript is a true
5 and correct record of the testimony given; that
6 said testimony was taken by me stenographically
7 and thereafter reduced to typewriting under my
8 direction; that reading and signing was requested;
9 and that I am neither counsel for, related to, nor
10 employed by any of the parties to this case and
11 have no interest, financial or otherwise, in its
12 outcome.

13
14 IN WITNESS WHEREOF, I have hereunto set my hand
15 and affixed my notarial seal this 23rd day of
16 January, 2021.

17
18 My commission expires: June 18, 2023.

19
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Transcript of Christian Carino, Volume 2

Date: March 11, 2022
Case: Depp, II -v- Heard

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VIRGINIA:

IN THE CIRCUIT COURT FOR FAIRFAX COUNTY

----- x
JOHN C. DEPP, II, :
Plaintiff, : Case No.
v. : CL-2019-0002911
AMBER LAURA HEARD, :
Defendant. :

----- x

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DEPOSITION OF

CHRISTIAN CARINO

FRIDAY, MARCH 11, 2022

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Transcript of Christian Carino, Volume 2
Conducted on March 11, 2022

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1 MR. PRESIADO: Hang on, hang on, hang on. 05:03:21
2 I object -- I object to you asking any questions. 05:03:22
3 Mr. Derin -- 05:03:25
4 MS. PINTADO: Okay. You stated your 05:03:26
5 objections, Leo. 05:03:28
6 MR. PRESIADO: -- it's up to you. I think 05:03:28
7 you're fully within your rights and Mr. Carino's 05:03:30
8 rights to end this deposition now. 05:03:33
9 MR. DERIN: Yeah, I think you -- you folks 05:03:36
10 can take it up with the judge. I think we'll put a 05:03:38
11 stipulation on the record with regard to, you know, 05:03:41
12 the signing the transcript and you folks can fight it 05:03:44
13 out with -- fight it out with your judge. You did it 05:03:48
14 last time, and we were forced to come back for a 05:03:51
15 second session of the deposition. And we were happy 05:03:54
16 to accommodate you to do that and, you know, we'll 05:03:57
17 live with whatever the resolution is with your judge. 05:04:02
18 All right? 05:04:06
19 MS. PINTADO: **Mr. Derin, perhaps you can at** 05:04:06
20 **least answer one question for me, which is Mr. Depp** 05:04:09
21 **had originally in February 2021 designated Mr. Carino** 05:04:13
22 **as an unretained expert. Are you aware of that?** 05:04:18

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Conducted on March 11, 2022

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1 MR. DERIN: I'm not aware of it and as far 05:04:22
2 as I understand, Mr. Carino -- you're talking about 05:04:25
3 at trial? 05:04:29
4 MS. PINTADO: He has -- he had designated 05:04:31
5 him as an unretained expert. Is it your 05:04:33
6 understanding that Mr. Carino is not going to be an 05:04:36
7 expert in this case? 05:04:39
8 MR. DERIN: That's -- that's my 05:04:39
9 understanding. And, Mr. Carino, you can confirm that 05:04:41
10 if you'd like, not -- not as a sworn witness, but 05:04:44
11 I -- I don't believe Mr. Carino is going to testify 05:04:48
12 as an expert. 05:04:51
13 MS. PINTADO: Leo, is that -- and, Leo, you 05:04:53
14 can confirm that as well. 05:04:56
15 MR. PRESIADO: Well, let's go off the 05:04:57
16 record. We're done with this deposition. 05:04:58
17 MS. PINTADO: I would like this to be on 05:05:00
18 the record. 05:05:02
19 MR. PRESIADO: No. It's not part of the 05:05:02
20 deposition. It's meet and confer. It's a totally 05:05:03
21 completely different subject. 05:05:06
22 THE WITNESS: Is it okay if I go take Bowie 05:05:07

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1 out? 05:05:08

2 MR. PRESIADO: Yes, you can. 05:05:09

3 MR. DERIN: **What -- what I can confirm for** 05:05:10

4 **you on the record is that Mr. Carino is not here to** 05:05:12

5 **testify as an expert witness today, so -- all right?** 05:05:15

6 **And in -- in any event, he's not here to give any** 05:05:20

7 **kind of expert testimony here today. You would** 05:05:25

8 **certainly, if he were to testify as an expert, have** 05:05:29

9 **the right to depose him as an expert witness, right?** 05:05:32

10 **So he didn't give any expert testimony. He** 05:05:37

11 **doesn't -- he's not here to testify as an expert.** 05:05:42

12 MS. PINTADO: Thank you, Mr. Derin. 05:05:46

13 MR. DERIN: All right. 05:05:47

14 MR. PRESIADO: Thanks, everybody. I 05:05:48

15 appreciate your time. 05:05:49

16 MR. DERIN: Well, let me -- let me -- I 05:05:50

17 don't know that we have a stipulation for executing 05:05:52

18 the deposition transcript as a California -- 05:05:53

19 MR. PRESIADO: Mr. Derin, we've just 05:05:57

20 been -- we've just been going by the California code 05:05:58

21 section. 05:06:01

22 MR. DERIN: Well, the California code 05:06:02