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Transcript of Tracey Jacobs

Date: January 28, 2021

Case: Depp, II -v- Heard

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VIRGINIA:

IN THE CIRCUIT COURT FOR FAIRFAX COUNTY

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

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Deposition of TRACEY JACOBS
Conducted Virtually
Thursday, January 28, 2021
12:08 p.m. EST

Job No.: 344489
Pages: 1 - 219
Reported By: Paul P. Smakula

1 up very, very late and you determined to fly out 12:56:40
2 to Australia to talk with him about it in March of 12:56:44
3 2015? 12:56:48

4 MR. CHEW: Objection; argumentative; lack 12:56:51
5 of foundation; assumes facts not in evidence. 12:56:55

6 A As I said, I always visited him on every 12:56:59
7 film, and there was this additional issue which I 12:57:04
8 wanted to deal with. 12:57:07

9 Q And the additional issue was Mr. Depp not 12:57:08
10 showing up on set or showing up very late on set; 12:57:10
11 is that correct? 12:57:16

12 MR. CHEW: Objection; argumentative. 12:57:17

13 A Yes. 12:57:18

14 Q When you arrived in Australia, where did 12:57:18
15 you go? 12:57:32

16 MR. MARMORSTEIN: You mean off the plane? 12:57:32

17 MS. BREDEHOFT: Yeah, that was badly 12:57:36
18 asked. Good point. Okay. 12:57:38

19 Q When you flew to Australia, were you aware 12:57:39
20 that Mr. Depp was on his way to LA? 12:57:43

21 A No, I was not. 12:57:46

22 Q When you arrived in Australia, how did you 12:57:46

1	MR. MARMORSTEIN: Join.	13:02:04
2	A I can't say. I wasn't there.	13:02:06
3	Q When you were talking earlier about there	13:02:07
4	being a change in Mr. Depp's behavior over the	13:02:11
5	last ten years of your representation and him	13:02:15
6	becoming more unprofessional, was part of	13:02:20
7	unprofessional behavior his increased use of	13:02:23
8	alcohol and drugs?	13:02:26
9	MR. CHEW: Objection; argumentative.	13:02:27
10	THE WITNESS: Should I answer?	13:02:36
11	MR. MARMORSTEIN: Go ahead.	13:02:38
12	A Yes.	13:02:38
13	Q Was part of the unprofessional behavior	13:02:38
14	that you witnessed increasing over the last ten	13:02:46
15	years of your representation of Mr. Depp his	13:02:49
16	increasing anger and tendency towards violence?	13:02:54
17	MR. CHEW: Objection; argumentative;	13:02:58
18	assumes facts definitely not in evidence; lack of	13:03:01
19	foundation.	13:03:04
20	MR. MARMORSTEIN: Join. You can answer if	13:03:05
21	you know.	13:03:07
22	A No.	13:03:07

1 A You asked me, I think, if he has 13:16:30
2 fundamental issues with anger, but is that in 13:16:32
3 respect to this or in general? I don't know. 13:16:34

4 Q I'm asking for your observations based on 13:16:37
5 your dealings with Mr. Depp, was it your 13:16:41
6 observation that Mr. Depp had fundamental issues 13:16:45
7 with anger? 13:16:48

8 MR. MARMORSTEIN: Objection; calls for 13:16:51
9 speculation; beyond the scope of witness. I don't 13:16:54
10 think she's -- she has the capacity to opine on 13:16:55
11 his condition or anger issues. She's not that 13:16:58
12 kind of professional. But you can answer if you 13:17:03
13 think you can, Tracey. 13:17:08

14 A Yeah. 13:17:10

15 MR. CHEW: Objection; lack of foundation 13:17:10
16 and lack of competency. 13:17:12

17 Q And in your observation of Mr. Depp having 13:17:16
18 fundamental issues with anger, did that worsen 13:17:19
19 over the time of your representation or was it 13:17:23
20 relatively the same? 13:17:26

21 A Yes. 13:17:31

22 MR. MARMORSTEIN: Which one, Tracey? 13:17:33

1 that Johnny Depp would be in Pirates 6? 13:52:13

2 A No. 13:52:17

3 Q Did you have any communications with Debby 13:52:17

4 Lloyd or Aaron Burham during the time that you 13:52:31

5 represented Johnny Depp? 13:52:35

6 A Who are those people? I don't know. 13:52:37

7 Q They're nurses that work with Dr. Kipper. 13:52:39

8 A No. 13:52:43

9 Q How frequently did you communicate with 13:52:43

10 Christy Dembrowski during your representation of 13:52:47

11 Mr. Depp? 13:52:52

12 A Initially, quite a bit. She wasn't his 13:52:52

13 assistant until five or so years in. I think I'd 13:52:55

14 given this statement in my deposition prior. And 13:53:01

15 then in the last several years she was impossible 13:53:04

16 to get on the phone or email. 13:53:07

17 Q Ms. Jacobs, just so you know, I don't have 13:53:09

18 your prior deposition. We requested them of 13:53:20

19 Mr. Depp, they have not been provided to us. So 13:53:24

20 I'm at a disadvantage, I don't have those. 13:53:26

21 MR. CHEW: That's actually not true. You 13:53:32

22 should check with your office staff, Elaine. You 13:53:36

1 can do that during a break. You've got 13:53:40
2 everything. 13:53:43
3 MS. BREDEHOFT: Okay. 13:53:43
4 Q Now, were you involved at all in the 13:53:43
5 negotiation of the Christian Dior contract with 13:53:46
6 Mr. Depp? 13:53:50
7 A Yes. But it was another woman who ran the 13:53:50
8 department named Lisa Jacobson, who's no longer at 13:53:53
9 UTA. 13:53:59
10 Q What was your understanding of what that 13:53:59
11 contract was with Mr. Depp? 13:54:01
12 A What do you mean what's my understanding? 13:54:04
13 I know how much money he was going to make. 13:54:08
14 Q Okay. How much money was Mr. Depp going 13:54:10
15 to make on the Christian Dior contract? 13:54:13
16 THE WITNESS: Am I okay to state this? 13:54:17
17 MR. MARMORSTEIN: If you have a concern, 13:54:20
18 maybe we should go off the record and we can talk 13:54:22
19 about it. Can we take five minutes, Counsel? 13:54:25
20 MR. CHEW: Certainly. 13:54:28
21 MS. BREDEHOFT: Sure. 13:54:29
22 THE VIDEOGRAPHER: Okay. It is 1:54 p.m. 13:54:30

1	against her by Johnny Depp?	14:40:00
2	A No.	14:40:04
3	MS. BREDEHOFT: Okay. You can go ahead	14:40:09
4	and take this off, Alex. Thank you. All right.	14:40:11
5	I'm going to ask you to bring up Deposition	14:40:16
6	Exhibit 12.	14:40:18
7	Q Ms. Jacobs, I'm going to ask you to take a	14:40:42
8	look at what has been marked as Deposition	14:40:45
9	Exhibit 12. Have you ever seen this picture	14:40:47
10	before?	14:40:54
11	A Not this exact picture.	14:40:56
12	Q Okay. And just to direct your attention,	14:41:00
13	the metadata is from May 21st, 2016 at 9:24 p.m.	14:41:03
14	Do you recognize this as Amber Heard?	14:41:17
15	A Yes.	14:41:19
16	MR. CHEW: Objection to the form of the	14:41:19
17	question; lack of personal knowledge; lack of	14:41:20
18	expertise. She's not a makeup artist, she's not	14:41:22
19	an expert. She's a talent agent.	14:41:26
20	Q Do you recognize this as Amber Heard?	14:41:29
21	MR. CHEW: Lack of foundation; lack of	14:41:34
22	personal knowledge; calls for speculation. The	14:41:36

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1	witness is not competent to testify.	14:41:40
2	A Yes.	14:41:42
3	Q Okay. Thank you.	14:41:43
4	MS. BREDEHOFT: Alex, you can take this	14:41:44
5	one down. Can you give me No. 13, please?	14:41:47
6	Q Ms. Jacobs, I'm going to ask you to take a	14:42:29
7	look at Deposition Exhibit 13. And this was also	14:42:35
8	May 21, 9:25. Have you seen this picture before?	14:42:38
9	A Not that I can recall.	14:42:46
10	Q Do you recognize the person in this	14:42:47
11	picture?	14:42:50
12	A Yes.	14:42:50
13	Q And who is it?	14:42:51
14	A Amber Heard.	14:42:52
15	Q Thank you.	14:42:53
16	MS. BREDEHOFT: All right. We can take	14:42:56
17	this one down. Alex, if you can go to 13. And	14:42:58
18	just so we can move it along, I'm going to go	14:43:03
19	through 13 through 22 pretty quickly, I hope, so	14:43:08
20	just putting you on notice, Alex.	14:43:10
21	PLANET DEPOS TECHNICIAN: This is Alex,	14:43:14
22	the tech, speaking. Thank you for the heads-up,	14:43:14

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1	Elaine. I think -- did you want No. 14 next?	14:43:17
2	MS. BREDEHOFT: Yes, please. Thanks.	14:43:20
3	Sorry.	14:43:23
4	PLANET DEPOS TECHNICIAN: Okay.	14:43:23
5	MS. BREDEHOFT: By the end of this, Alex,	14:43:39
6	we're just going to think your last name is "The	14:43:41
7	Tech."	14:43:44
8	Q Ms. Jacobs, I'm going to ask you to take a	14:43:45
9	look at what has been labeled Jacobs Exhibit 14,	14:43:48
10	also dated May 21. Have you seen this picture	14:43:54
11	before?	14:43:58
12	A Not that I can recall.	14:43:58
13	Q All right. Do you recognize the person in	14:43:59
14	this photo?	14:44:00
15	A Yes.	14:44:02
16	Q Okay. And it is?	14:44:02
17	A Amber Heard.	14:44:03
18	Q Thank you.	14:44:04
19	MS. BREDEHOFT: We can take this one down,	14:44:08
20	Alex, and if you can give me 15.	14:44:10
21	Q Ms. Jacobs, I'm going to ask you to take a	14:44:17
22	look at Jacobs Exhibit 15. Do you recognize this	14:44:27

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1	photo? Let me ask that separately.	14:44:30
2	Have you ever seen this photo before?	14:44:32
3	A No.	14:44:34
4	Q Do you recognize the person in this photo?	14:44:34
5	A Yes.	14:44:38
6	Q And who is that?	14:44:38
7	A Amber Heard.	14:44:39
8	Q Thank you.	14:44:41
9	MS. BREDEHOFT: Okay. We can take this	14:44:42
10	one off, Alex, and we'll go to No. 16, please.	14:44:45
11	Q Ms. Jacobs, have you ever seen this photo	14:44:59
12	before?	14:45:02
13	A Not that I can recall.	14:45:02
14	Q All right. Do you recognize the person in	14:45:04
15	this photo?	14:45:05
16	A Yes.	14:45:06
17	Q Who is it?	14:45:06
18	A Amber Heard.	14:45:07
19	Q Thank you.	14:45:09
20	MS. BREDEHOFT: Alex, we can take down 16.	14:45:11
21	Let's go to 17, please.	14:45:16
22	Q I'm going to ask you to take a look at	14:45:29

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1	what has been marked as Exhibit 17. Have you seen	14:45:31
2	this photo before?	14:45:35
3	A Not that I can recall.	14:45:36
4	Q Do you recognize the person in this photo?	14:45:37
5	A Yes.	14:45:39
6	Q And that is?	14:45:39
7	A Amber Heard.	14:45:40
8	Q Thank you.	14:45:41
9	MS. BREDEHOFT: Let's go to No. 18,	14:45:42
10	please.	14:45:45
11	Q Ms. Jacobs, I'm going to ask if you've	14:46:06
12	seen this photo before?	14:46:08
13	A No.	14:46:10
14	Q Do you recognize the person in this photo?	14:46:10
15	A Yes.	14:46:12
16	Q And who is it?	14:46:12
17	A Amber Heard.	14:46:13
18	Q Thank you.	14:46:14
19	MS. BREDEHOFT: All right. Let's go to	14:46:15
20	19, please.	14:46:18
21	Q Have you seen this photo before,	14:46:23
22	Ms. Jacobs?	14:46:26

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1	A No.	14:46:26
2	Q Do you recognize the person in this photo?	14:46:26
3	A Yes.	14:46:28
4	Q And who is it?	14:46:29
5	A Amber Heard.	14:46:30
6	Q Thank you.	14:46:33
7	MS. BREDEHOFT: Let's go to No. 20.	14:46:34
8	Q Have you seen this photo before?	14:46:40
9	A No.	14:46:43
10	Q Do you recognize the person in this photo?	14:46:43
11	A It's Amber Heard.	14:46:46
12	Q Okay. Thank you.	14:46:49
13	MS. BREDEHOFT: Let's go to 21. We're	14:46:50
14	almost done with this set.	14:46:52
15	MR. CHEW: I hope so.	14:46:55
16	Q And I'll ask the same question. Have you	14:46:56
17	seen this photo before?	14:46:59
18	A Not that I can recall.	14:47:00
19	Q All right. And do you recognize the	14:47:01
20	person in the photo?	14:47:03
21	A Yes.	14:47:04
22	Q Who is it?	14:47:05

1	A Amber Heard.	14:47:06
2	Q Thank you.	14:47:08
3	MS. BREDEHOFT: And let's go to the last	14:47:09
4	of this set, 22.	14:47:12
5	Q Have you seen this photo before?	14:47:14
6	A Not that I can recall.	14:47:18
7	Q Do you recognize the person in this photo?	14:47:19
8	A Yes.	14:47:21
9	Q And who is it?	14:47:21
10	A Amber Heard.	14:47:22
11	Q Thank you.	14:47:23
12	MS. BREDEHOFT: Okay. Alex, you can take	14:47:25
13	that.	14:47:28
14	Q And then were you involved in any manner	14:47:28
15	in the mediation and settlement efforts between	14:47:31
16	Mr. Depp and Ms. Heard following Ms. Heard filing	14:47:35
17	for divorce in May 2016?	14:47:39
18	A No.	14:47:41
19	MR. MARMORSTEIN: Objection; vague and	14:47:42
20	ambiguous.	14:47:45
21	Q Based on your client's [sic] objection,	14:47:45
22	did you understand what I meant by that?	14:47:52

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1	A Yes.	14:47:54
2	Q All right. I'm going to ask you to take a	14:47:54
3	look at Exhibit 24.	14:48:04
4	Ms. Jacobs, have you ever seen this photo	14:48:40
5	before?	14:48:41
6	A No.	14:48:42
7	Q Do you recognize the people in that photo?	14:48:42
8	A No.	14:48:51
9	Q Do you recognize one of them as Mr. Depp?	14:48:51
10	MR. MARMORSTEIN: Objection; asked and	14:48:56
11	answered; argumentative. If she doesn't recognize	14:48:58
12	the people, she wouldn't recognize one as Johnny	14:49:00
13	Depp.	14:49:03
14	MR. CHEW: Same objection. Asked and	14:49:06
15	answered.	14:49:10
16	MS. BREDEHOFT: I'm sorry, I'm waiting for	14:49:12
17	the answer.	14:49:15
18	A I --	14:49:16
19	MR. MARMORSTEIN: She's asking again	14:49:18
20	whether you recognize anybody in this photo.	14:49:19
21	Q No, I'm actually asking if you recognize	14:49:22
22	one of them as Johnny Depp?	14:49:26

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1	MR. MARMORSTEIN: That presumes she has	14:49:28
2	any recognition, which she said she doesn't. Go	14:49:29
3	ahead.	14:49:35
4	A I've never seen this.	14:49:35
5	Q I'm sorry?	14:49:37
6	A I've never seen this.	14:49:37
7	Q But notwithstanding that you've never seen	14:49:37
8	it, do you recognize one of the people in that	14:49:39
9	photo as Johnny Depp?	14:49:42
10	A It's hard to see.	14:49:43
11	Q Have you ever seen Mr. Depp snort cocaine?	14:49:45
12	A No.	14:49:51
13	Q Are you able to say one way or the other	14:49:51
14	whether Mr. Depp snorted cocaine while you were	14:49:56
15	representing him?	14:50:00
16	A No.	14:50:01
17	MR. CHEW: Objection. Objection; she's	14:50:01
18	already answered the question.	14:50:04
19	MS. BREDEHOFT: Okay. Let's take this one	14:50:07
20	down and let's go up to 25. And, Ben, I believe	14:50:08
21	you're incorrect, but it doesn't matter, she	14:50:12
22	answered the question.	14:50:15

1	Q Do you recognize the people in this photo?	14:50:30
2	A Yes.	14:50:31
3	Q Have you ever seen this photo before?	14:50:32
4	A No.	14:50:33
5	Q Who are the people in this photo?	14:50:34
6	A Amber Heard and Johnny Depp.	14:50:35
7	Q All right. Now, during the time that you	14:50:38
8	represented Johnny Depp, did he smoke?	14:50:41
9	A Yes.	14:50:45
10	Q For the entire 30 years or was there	14:50:45
11	periods where he was on or off or took it up	14:50:51
12	later?	14:50:59
13	MR. MARMORSTEIN: Objection; calls for	14:50:59
14	speculation; lacks foundation. You can answer.	14:51:03
15	A The entire 30 years.	14:51:04
16	MS. BREDEHOFT: We can take this one down	14:51:07
17	and then let's go to the next one, 26. Excuse me.	14:51:09
18	Q I'm going to ask you to take a look at	14:51:21
19	Jacobs Exhibit 26. Have you ever seen this photo	14:51:23
20	before, Ms. Jacobs?	14:51:27
21	A No.	14:51:28
22	Q Do you recognize the person in this photo?	14:51:28

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1	MR. CHEW: Objection; lack of foundation.	14:51:30
2	She's never seen it before.	14:51:32
3	A No.	14:51:34
4	MS. BREDEHOFT: All right. Let's take	14:51:35
5	that down and let's go to 27.	14:51:36
6	Alex, are you having trouble with this	14:52:17
7	one? There we go. Okay.	14:52:20
8	Q I'm going to ask you to take a look at	14:52:23
9	Jacobs Exhibit 27. Have you ever seen this	14:52:27
10	picture before?	14:52:31
11	A No.	14:52:31
12	Q It's a little bit closer up. Do you	14:52:32
13	recognize the person in this photo?	14:52:35
14	MR. CHEW: Objection; lack of foundation.	14:52:36
15	She says she's never seen it before.	14:52:38
16	MR. MARMORSTEIN: Go ahead, Tracey.	14:52:41
17	A It looks like Johnny.	14:52:45
18	Q Have you ever seen Mr. Depp in this state	14:52:46
19	before as depicted in Exhibit 27?	14:52:49
20	MR. CHEW: Objection; vague. What -- what	14:52:55
21	state is that?	14:52:56
22	MR. MARMORSTEIN: Join.	14:52:57

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1	MS. BREDEHOFT: Passed out on the floor.	14:52:58
2	MR. CHEW: State of California?	14:52:58
3	A I don't recall.	14:52:59
4	Q Were there occasions during the time you	14:53:00
5	represented Johnny Depp that he was passed out,	14:53:04
6	that you would see him passed out?	14:53:08
7	A I don't recall.	14:53:12
8	MS. BREDEHOFT: All right. Let's go to	14:53:16
9	28, please.	14:53:18
10	Q I'm going to ask you to take a look at	14:53:49
11	Jacobs Exhibit 28. Do you recognize the person in	14:53:53
12	this photo?	14:53:57
13	MR. CHEW: Objection; lacks foundation.	14:53:59
14	A It looks like Johnny, but I don't know.	14:54:00
15	Q Have you ever seen Mr. Depp in the state	14:54:02
16	he's depicted in in this photo before?	14:54:06
17	MR. CHEW: Objection; asked and answered.	14:54:09
18	A I don't recall.	14:54:16
19	Q Do you recall ever seeing this photo	14:54:16
20	before?	14:54:17
21	A Never saw it.	14:54:17
22	Q Okay.	14:54:18

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1	MS. BREDEHOFT: You can take that down.	14:54:19
2	We'll go to 29.	14:54:21
3	Q Ms. Jacobs, do you recognize this bag with	14:54:31
4	the things in this bag?	14:54:34
5	A No.	14:54:35
6	MS. BREDEHOFT: We can take down 29.	14:54:38
7	Let's go to 30.	14:54:40
8	Q Ms. Jacobs, have you ever seen this	14:54:48
9	picture before?	14:54:50
10	A No.	14:54:52
11	Q I'm going to ask --	14:54:52
12	MS. BREDEHOFT: Alex, could you possibly	14:54:56
13	blow up this picture a little bit more so we can	14:55:01
14	get the name on the credit card? Is it possible?	14:55:03
15	MR. MARMORSTEIN: Too blurry.	14:55:09
16	MS. BREDEHOFT: Okay. Okay. Thank you.	14:55:10
17	All right. We'll take that one down. We'll go to	14:55:17
18	number 29.	14:55:23
19	PLANET DEPOS TECHNICIAN: Did you want 29?	14:55:27
20	Back one, Elaine?	14:55:31
21	MS. BREDEHOFT: Wait. Oh, no, what is	14:55:33
22	this one? Is this one 30?	14:55:41

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1	PLANET DEPOS TECHNICIAN: Yes, ma'am.	14:55:41
2	MS. BREDEHOFT: Then let's go to 31.	14:55:41
3	Thank you.	14:55:41
4	PLANET DEPOS TECHNICIAN: Certainly.	14:55:46
5	Q Ms. Jacobs, I'm going to ask you to take a	14:55:46
6	look at what has been marked as Jacobs Exhibit 31.	14:55:49
7	Have you seen this photo before?	14:55:52
8	A No.	14:55:54
9	Q I'm going to direct your attention to this	14:55:54
10	box that says property of JD with a skull and	14:55:56
11	crossbones. Have you ever seen Johnny Depp with	14:56:03
12	this box before?	14:56:08
13	A No.	14:56:10
14	MS. BREDEHOFT: All right. We can take	14:56:11
15	that one down, Alex. Let's go to 32.	14:56:12
16	Q I'm going to ask you to take a look at 32,	14:56:18
17	Ms. Jacobs. Have you ever seen this picture	14:56:23
18	before?	14:56:26
19	A No.	14:56:26
20	Q Do you recognize the person in this photo?	14:56:26
21	A Yes.	14:56:29
22	Q And who is it?	14:56:29

1	A Johnny Depp.	14:56:30
2	MS. BREDEHOFT: All right. We can take	14:56:33
3	that down. And 33, please.	14:56:34
4	Q Ms. Jacobs, I'm going to ask you to take a	14:56:45
5	look at 33. Have you ever seen this picture	14:56:46
6	before?	14:56:51
7	A No.	14:56:52
8	Q Do you recognize the person in this?	14:56:52
9	A Yes.	14:56:54
10	Q And can you tell what Mr. Depp is doing in	14:56:55
11	this picture?	14:56:58
12	MR. CHEW: Objection; clearly calls for	14:57:00
13	speculation; lack of personal knowledge. She's	14:57:03
14	never seen this photograph before.	14:57:05
15	MR. MARMORSTEIN: Join. Join in the	14:57:08
16	objections.	14:57:08
17	MS. BREDEHOFT: Hold on, I'm going to	14:57:08
18	withdraw that because I forgot to ask the one	14:57:08
19	right before it.	14:57:11
20	Q Who is the person in this picture?	14:57:11
21	A It looks like Johnny Depp.	14:57:12
22	MS. BREDEHOFT: Okay. Can you tell -- now	14:57:14

1 I'm going to ask the question, and you guys can -- 14:57:16
2 I'll let you have that, just say repeat on your 14:57:16
3 objections so we don't waste the time -- 14:57:16
4 Q Can you tell what Mr. Depp is doing in the 14:57:23
5 picture? 14:57:26
6 MR. CHEW: Objection; lack of personal 14:57:26
7 knowledge; lack of foundation; clearly calls for 14:57:28
8 speculation from a witness who said that she's 14:57:31
9 never seen this picture before. 14:57:33
10 MR. MARMORSTEIN: Join. I'm not sure how 14:57:36
11 she understands what's going on in a picture. 14:57:38
12 A I'm not sure. 14:57:42
13 MS. BREDEHOFT: Okay. Take that down and 14:57:43
14 we'll go to 34. 14:57:44
15 Q Have you seen this picture before? 14:57:54
16 A No. 14:57:57
17 Q I'm pretty sure that if I ask you if you 14:57:57
18 recognize the person's hand in there, you're going 14:58:05
19 to say you don't, would I -- would you agree with 14:58:08
20 me in that? 14:58:11
21 A Correct. 14:58:12
22 Q Okay. Do you recognize what's in that 14:58:12

1	hand?	14:58:15
2	A No.	14:58:15
3	MS. BREDEHOFT: All right. That's fine,	14:58:16
4	we'll take it down. Thank you.	14:58:17
5	MR. MARMORSTEIN: Do you recognize what's	14:58:18
6	in that? What is that?	14:58:20
7	THE WITNESS: It looks like a cigar. I	14:58:22
8	have no idea.	14:58:24
9	Q All right. Now, were you aware that	14:58:25
10	Mr. Depp filed a lawsuit in the United Kingdom	14:58:27
11	against The Sun Newspapers, and Dan Wootton, the	14:58:35
12	editor, because they called him a wife beater?	14:58:42
13	A Yes.	14:58:45
14	Q Did you follow any of the press, publicity	14:58:46
15	associated with that litigation and the trial?	14:58:50
16	A Sometimes.	14:58:54
17	MR. MARMORSTEIN: Objection; vague and	14:58:55
18	ambiguous.	14:58:56
19	Q Okay. Do you know whether any of the	14:58:56
20	pictures and video that I just showed you from	14:58:58
21	Exhibit 12 through 34 were exhibits in that trial?	14:59:01
22	A No.	14:59:09

1	Q And why not?	15:49:57
2	A Because as I just said, it was similar to	15:49:58
3	some of the events in his personal life with the	15:50:01
4	man -- the story itself about the lead.	15:50:05
5	MR. CHEW: Alex, if you would please move	15:50:14
6	ahead to Exhibit 9.	15:50:15
7	MS. BREDEHOFT: And, Ben, may I -- for all	15:50:22
8	of these UTAs that are labeled, may I just have a	15:50:24
9	blanket objection to them being referred to as not	15:50:27
10	being produced in discovery?	15:50:31
11	MR. CHEW: You certainly may, Elaine, but	15:50:33
12	they were all produced to your office prior to	15:50:36
13	this deposition. So you should, again, check with	15:50:39
14	them, because you got that and you got the	15:50:41
15	deposition transcripts, so --	15:50:43
16	MS. BREDEHOFT: And I understand you've	15:50:46
17	said that, I haven't seen them, you might be right	15:50:47
18	I might be wrong, but if I'm right then I want to	15:50:50
19	preserve the objections. So I'm -- but I'm trying	15:50:53
20	to not to make this longer, I just want to have a	15:50:56
21	blanket objection and we can deal with it later.	15:51:00
22	MR. CHEW: Okay. Are we on -- yes, we're	15:51:03

1 the biggest movie star in the world. 16:42:25

2 Q Movie star. Thank you. Forgive me. So 16:42:28

3 as of the time that you were terminated by 16:42:31

4 Mr. Depp in October 2016, did you still believe 16:42:33

5 that Mr. Depp was the greatest movie star in the 16:42:38

6 world? 16:42:43

7 A No. 16:42:44

8 Q Why not? 16:42:44

9 A Because his star had dimmed due to it 16:42:46

10 getting harder to get him jobs given the 16:42:52

11 reputation he had acquired due to his lateness and 16:42:58

12 other things. 16:43:03

13 Q And what were the other things? 16:43:03

14 A Just, you know, people were talking and 16:43:05

15 the question was out there about his behavior. 16:43:12

16 Q And that behavior included? 16:43:17

17 A I think I described it several times. 16:43:22

18 MR. CHEW: Asked and answered. 16:43:25

19 Q Would that behavior include alcohol and 16:43:26

20 drug use? 16:43:30

21 MR. CHEW: Objection; that 16:43:32

22 mischaracterizes her testimony; and it's been 16:43:33

Transcript of Tracey Jacobs
Conducted on January 28, 2021

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1 Virginia, but we're fine with 30, and if she has 17:01:16
2 any corrections, typos, things of that nature she 17:01:20
3 can do that or she can waive her signature, so you 17:01:25
4 might want to put that on the record. 17:01:27

5 MR. MARMORSTEIN: Yeah. No, we would like 17:01:27
6 the opportunity to have her review and revise as 17:01:28
7 needed her transcript. 30 days I think would be 17:01:31
8 fine, and if it has to be longer I'll let you 17:01:34
9 know. 17:01:34

10 MS. BREDEHOFT: Okay. Thank you. 17:01:39

11 MR. CHEW: Thank you, David. Thank you, 17:01:39
12 Tracey. 17:01:40

13 MR. MARMORSTEIN: Thank you. Thank you, 17:01:40
14 Tracey. 17:01:40

15 THE VIDEOGRAPHER: Okay. It is the end of 17:01:43
16 the testimony of Tracey Jacobs. It is 5:01 p.m. 17:01:44
17 We go off the record. 17:01:50

18 (Off the record at 5:01 p.m.)
19
20
21
22

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 5th day of
16 February, 2021.

17
18 My commission expires: June 18, 2023.

19
20  

21 NOTARY PUBLIC IN AND FOR
22 THE STATE OF MARYLAND