

TRANSCRIPT OF THE POOL TV FEED FROM DEPP v HEARD

FAIRFAX COUNTY COURT Wednesday 27 April 2022

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Man 1: All rise. Circuit Court of the Fairfax County is now in session. The Honorable Penney Azcarate presiding.

Judge Azcarate: Good morning, Judy. All right, good morning.

Together: Good morning, Your Honor.

Judge Azcarate: All right. Do we have any preliminary matters before?

Ms. Bredehoff: We do, Your Honor. If I may approach?

Judge Azcarate: Okay, sure. All right. Are we ready for the jury then?

Together: Yes, Your Honor.

Judge Azcarate: Okay. All right. All right. Good morning, ladies and gentlemen. Please be seated. All right, your next witness.

Mr. Chew: Yes. Good morning, Your Honor. Mr. Depp calls Ofc. Tyler Hadden. And ladies and gentlemen of the jury, the first part of the testimony you will hear is questioning by Ms. Heard's counsel and then we'll let you know when Mr. Depp's counsel takes over the question.

Judge Azcarate: All right, thank you. By deposition. Thank you.

Ms. Bredehoff: Please state your name and your business address.

Ofc. Adam: Tyler Hadden. 1546 West Martin Luther King Junior Boulevard, Los Angeles, California.

Ms. Bredehoff: And what is your occupation?

Ofc. Hadden: I'm a police officer for the City of Los Angeles.

Ms. Bredehoff: And how long have you been a police officer with the City of Los Angeles?

Ofc. Hadden: Approximately five and a half years.

Ms. Bredehoff: Did you serve in any law enforcement capacity prior to coming to the LAPD?

Ofc. Hadden: No.

Ms. Bredehoff: When you said approximately five and a half years, do you recall approximately when you started employment with the LAPD?

Ofc. Hadden: Approximately November of 2015.

Ms. Bredehoff: Did you attend the police academy prior to November 2015 or did you attend it after you became employed by the LAPD on November of 2015?

Woman 1: Your Honor, could we turn that volume...

Ofc. Hadden: I began in the academy in 2015 at November.

Judge Azcarate: The volume is a little loud. Thank you.

Ms. Bredehoff: And how long were you with the academy?

Ofc. Hadden: Approximately six months.

Ms. Bredehoff: And when did you start as a patrol officer with the LAPD?

Ofc. Hadden: Six months after November.

Ms. Bredehoff: Can you recall your date when you started patrol?

Ofc. Hadden: I don't recall the exact date. No.

Ms. Bredehoff: And that would be May, end of May of 2016?

Ofc. Hadden: Right.

Ms. Bredehoff: And was the first training officer that you worked with on patrol, Melissa Saenz?

Ofc. Hadden: Yes.

Woman 2: Question, when did you first have body-worn video assigned to you?

Ofc. Hadden: I'm not sure of the exact date.

Ms. Bredehoff: Approximately when?

Ofc. Hadden: Approximately three months into working patrol. So maybe during the summertime.

Ms. Bredehoff: The summer of 2016?

Ofc. Hadden: Correct.

Ms. Bredehoff: When you started working with Melissa Saenz as your training officer, did Ofc. Saenz have body video?

Ofc. Hadden: Not at the time I worked with her.

Ms. Bredehoff: How much training did you have on domestic violence while you were at the academy?

Ofc. Hadden: I don't recall the exact amount of time.

Ms. Bredehoff: Approximately how much?

Ofc. Hadden: Twenty hours, approximately.

Ms. Bredehoff: Oh, just to make sure that I understand. We do have a few disjointed questions and answers. So, it was your understanding as of May 2016 that if you answered a call for domestic violence and there was evidence of a crime even if the victim did not wanna press charges that you had to take a report. Is that correct?

Ofc. Hadden: If there's evidence of a crime, yes.

Ms. Bredehoff: So your best recollection today is that you had been on patrol as a probationary officer somewhere between a week and three weeks before answering the May 21, 2016 domestic violence call at Eastern Columbia Building, is that correct?

Ofc. Hadden: Correct.

Ms. Bredehoff: Do you recall any of the other incidents that you reported to that evening of May 21st, 2016?

Ofc. Hadden: No.

Ms. Bredehoff: At all? Any part of them?

Ofc. Hadden: No.

Ms. Bredehoff: So this was new for you working with Ofc. Saenz. Is that correct?

Ofc. Hadden: Correct.

Ms. Bredehoff: And as a probationary officer then, you would defer to Ofc. Saenz. Is that fair?

Ofc. Hadden: Correct.

Ms. Bredehoff: And if you could just describe to me what your understanding of Ofc. Saenz's role was to you as your training officer in May 2016.

Ofc. Hadden: To teach me and guide me on how to become a... Complete the duties of being a law officer.

Ms. Bredehoff: Ofc. Hadden, under your understanding of the LAPD rules in 2016, if a victim of domestic violence said that the altercation was only verbal, would that require you to write a report?

Ofc. Hadden: No.

Ms. Bredehoff: Okay. Now, I'm going to ask you to take a look at the first page of what has been marked as deposition Exhibit Number 1, Section number 3. My apology. And this is an incident recall, do you... What is your understanding of what this document is, Ofc. Hadden?

Ofc. Hadden: It's essentially what is given to us on our computer.

Ms. Bredehoff: And what do you mean is given to us on our computer?

Ofc. Hadden: In our car.

Ms. Bredehoff: Right. So, what happens?

Ofc. Hadden: So, when we're assigned a radio call, the radio call comes to our computer in our car and this is what we see on our screen. But in a different format.

Ms. Bredehoff: Now, how was this particular call characterized by the dispatch at least initially?

Ofc. Hadden: Initially it was dispatched as a domestic radio call.

Ms. Bredehoff: Okay. And what does domestic radio call mean to you?

Ofc. Hadden: That there's some type of whether it's disagreement all the way up to a violent crime that's occurred between two people that are in some type of relationship or have some children in common.

Ms. Bredehoff: So Ofc. Hadden, this comes out into the system and it's accessible by all of the LAPD Black and Whites that are on patrol that night. Correct?

Ofc. Hadden: Yes, whoever is logged in and working that night, I could look up any divisions' radio calls if I wanted to.

Ms. Bredehoff: And then it has... Next, it has a DS and then ER after stat. What does that mean?

Ofc. Hadden: DS means dispatched. ER means we're in route.

Ms. Bredehoff: So at 8:46 and 37 seconds p.m., your vehicle was on route to 849 South Broadway, correct?

Ofc. Hadden: Correct.

Ms. Bredehoff: Do you recall how far away you were?

Ofc. Hadden: I do not recall.

Ms. Bredehoff: And then it says primary unit PV/1A1-W3. What is that?

Ofc. Hadden: That's my call assignment. So, the PD is police department. 1A1 is my car assignment. W3 means I work watch 3.

Ms. Bredehoff: Okay. Then we have at 20:57 which is 8:57 p.m., AS. What does that mean?

Ofc. Hadden: As scene like we're there.

Ms. Bredehoff: All right. So, you arrived at the scene at 8:57 p.m., correct?

Ofc. Hadden: Correct.

Ms. Bredehoff: What did you do then?

Ofc. Hadden: We walked to the location.

Ms. Bredehoff: Do you recall anything that you did before you went up to the penthouse?

Ofc. Hadden: We walked in and met with security who showed us where the elevator was.

Ms. Bredehoff: Did you do anything else?

Ofc. Hadden: Not that I recall.

Ms. Bredehoff: But your best recollection is that you went in, you talked to security, and then you went on an elevator. Is that right?

Ofc. Hadden: Yes.

Ms. Bredehoff: Do you recall what time you arrived at the apartment, the penthouse?

Ofc. Hadden: No, I don't. I don't recall.

Ms. Bredehoft: All right. Then your next entry here is 21:22. So that would be 9:22 p.m and 57 seconds?

Ofc. Hadden: Yeah.

Ms. Bredehoft: Okay. Checked with victim, checked lock, verified husband left location, victim advised verbal. Do you see that?

Ofc. Hadden: Mm-hmm.

Ms. Bredehoft: Who wrote that?

Ofc. Hadden: That's what we write when we put the comments of the call of what happened in the radio call. That's what we wrote.

Ms. Bredehoft: So, do you recall whether that was you that wrote that or Ofc. Saenz?

Ofc. Hadden: I don't recall who wrote that.

Ms. Bredehoft: All right. And so you were back in your vehicle by 9:22. Is that correct?

Ofc. Hadden: Approximately. Yeah.

Ms. Bredehoft: Well, if you wrote this at 9:22, would it be fair to say you were back in your vehicle writing this?

Ofc. Hadden: Yes.

Ms. Bredehoft: Okay. Now, did you take a report?

Ofc. Hadden: We issued a business card.

Ms. Bredehoft: I asked, did you take a report?

Ofc. Hadden: No.

Ms. Bredehoft: Why not?

Ofc. Hadden: Because the victim didn't request report and during our investigation, didn't reveal that we need to take a report.

Ms. Bredehoft: So who decided to use the words "Victim advised verbal," this field?

Ofc. Hadden: Whoever created the comments of the call use the word victim. Whoever gave the comments of the call use the word victim. So I don't know who that was.

Ms. Bredehoff: And I'm even more specifically asking who chose the language "advised verbal dispute"?

Ofc. Hadden: It's either my partner or I. I don't recall who.

Ms. Bredehoff: Now, what is the significance of writing down verbal dispute?

Ofc. Hadden: We're writing what happened, what we believe has happened, and what our investigation revealed.

Ms. Bredehoff: But you were not present at any time when Ms. Heard discussed whether there was any type of verbal argument. Is that correct?

Ofc. Hadden: Was I there? Yes. Was I speaking to her? No.

Ms. Bredehoff: Was there any discussion of verbal argument in your presence when you were up in the penthouse investigating?

Ofc. Hadden: Not that I recall.

Ms. Bredehoff: You did not hear Ms. Heard say that it was only a verbal dispute, correct?

Ofc. Hadden: I did not.

Ms. Bredehoff: Okay. Now, I asked you a little earlier if it's a verbal dispute whether that triggers having to write a report and you indicated that it is not. Am I accurately characterizing that?

Ofc. Hadden: Correct.

Ms. Bredehoff: Okay. Now, here in addition to the victim advised verbal dispute says, "And refused to give any further information." Do you see that?

Ofc. Hadden: Yes.

Woman 2: Question. Okay. So if the victim does not want to press charges and advises that it's a verbal dispute, then that would not trigger you writing a report. Is that your understanding of LAPD...

Ms. Bredehoff: ...policies and procedures on domestic violence at that time?

Ofc. Hadden: Correct. There are other circumstances that were also within this incident as well.

Ms. Bredehoft: What do you mean by that?

Ofc. Hadden: There are investigations. We had other reasons to believe that this was true.

Ms. Bredehoft: I'm sorry. During your investigation, you had other reasons to believe what was true?

Ofc. Hadden: That it was a verbal dispute.

Ms. Bredehoft: And what did you have during your investigation that created in your mind evidence that it was only a verbal dispute?

Ofc. Hadden: After discussing the investigation with my partner at the city, Ms. Heard refused any medical treatment and had no visible injuries. There was no sign of struggle and the victim or correction, the witness that was there that I spoke with, he was uncooperative as well.

Ms. Bredehoft: Anything else?

Ofc. Hadden: At this time, that's all.

Ms. Bredehoft: Okay. Now, you recall seeing that Ms. Heard was in tears, and was crying, and red-faced. Would you agree?

Ofc. Hadden: Correct. From a distance.

Ms. Bredehoft: Well, from a distance Ms. Heard was in tears, crying, and had a red face, correct?

Ofc. Hadden: Correct.

Ms. Bredehoft: Why did you issue a business?

Ofc. Hadden: It's part of our policy that we're supposed to issue a business card and it shows that we are there, and completed an investigation. And if she would like us to come back, we offer that assistance that we can come back at another time if she feels like she needs us to come back.

Ms. Bredehoft: Did you take any notes at all?

Ofc. Hadden: Notes of what?

Ms. Bredehoft: Notes during the time that you were investigating this call.

Ofc. Hadden: No.

Ms. Bredehoff: Did you take any notes after you got back down to your car about the call?

Ofc. Hadden: No.

Ms. Bredehoff: Did you take any pictures?

Ofc. Hadden: No.

Ms. Bredehoff: Did you record anything?

Ofc. Hadden: No.

Ms. Bredehoff: Would it be fair to say that on 5/21/2016 at 9:22 p.m., you and your training officer, Saenz, considered this incident closed?

Ofc. Hadden: I said yes, that is correct. At that time we pressed enter and those all went off of my screen, meaning it was completed.

Ms. Bredehoff: Did you ever have anything come up on your screen again relating to this incident that evening?

Ofc. Hadden: Not that I recall.

Ms. Bredehoff: All right. At the time that you closed out this incident on your screen at 9:22 on 5/21/2016, did you know that this call involved Johnny Depp?

Ofc. Hadden: No.

Ms. Bredehoff: At the time that you closed this out on your screen, did you recognize Amber Heard?

Ofc. Hadden: No. I had no idea who she was.

Ms. Bredehoff: And is it fair to say that you considered these people to be "just citizens"?

Ofc. Hadden: That's correct.

Ms. Bredehoff: Do you have any communications at all with Ofc. Gatlin or his patrol partner the night of May 21st, 2016?

Ofc. Hadden: No, not that I recall.

Ms. Bredehoff: So the next thing we're gonna go to is the CAD summary which is at page 12 of Exhibit Number 3 and this is a CAD summary report, and it also has the name DFAR Report at the top. And it's for

5/21/2016. And says specifically Officer Hadden and Officer Saenz. Do you see that?

Ofc. Hadden: Yes.

Ms. Bredehoff: Typically when you would arrive for your shift, was there a period of time that you would do things maybe at the precinct or whatever before you get into your vehicle and log on, and go forward?

Ofc. Hadden: Yes.

Ms. Bredehoff: Okay. What...

Ofc. Hadden: And then go and find out if there's any radio calls pending.

Ms. Bredehoff: Okay. And so how long would it typically take for you to do all those things from putting your uniform on through the time you start checking for radio call?

Ofc. Hadden: I'm not sure. Approximately an hour.

Ms. Bredehoff: All right. How many police officers, patrol officers were part of that roll call?

Ofc. Hadden: I don't know the exact number. I would say approximately 30.

Ms. Bredehoff: Okay. And when you said you had to stand in line to check out your equipment, was it all 30 of those patrol officers that would get in line and check out their equipment?

Ofc. Hadden: Yes, and supervisors.

Ms. Bredehoff: Okay. And what equipment were you checking out that night?

Ofc. Hadden: A shotgun, a less lethal shotgun, mics for our cameras inside the car, pouches for our mics, batteries for our radios, keys for the cars, hazer. I think that's about it right now.

Ms. Bredehoff: Do you have a recollection of there being cameras inside your car back on May 21, 2016?

Ofc. Hadden: Yes, I believe so.

Ms. Bredehoff: Now, when you arrived at the penthouse, you saw that there was a female holding and embracing Ms. Heard, correct?

Ofc. Hadden: I believe it was when I was leaving the location when we were getting ready to leave?

Ms. Bredehoff: Okay. Now, you believed that Ms. Heard was uncooperative because she was being emotional, crying, was refusing that she was hurt and she didn't know initially whether she wanted to file a report or not. And then she didn't wanna file a report, correct?

Ofc. Hadden: Correct.

Ms. Bredehoff: Now, you said that Ofc. Saenz told you later that Ms. Heard called the number on the business card. Do you recall when Ofc. Saenz told you that Ms. Heard called the number on the card?

Ofc. Hadden: No, I don't recall.

Ms. Bredehoff: Do you recall approximately how much time you spent at the penthouse speaking with either the male or with Ms. Heard, or looking at the premises that night?

Ofc. Hadden: I don't recall right now.

Ms. Bredehoff: Do you recall roughly whether it was 15 minutes, a half hour, hour?

Ofc. Hadden: I don't. I don't recall.

Ms. Bredehoff: I'm gonna ask you to take a look at what has been marked as deposition Exhibit Number 17. I'll just scroll down so you can see that. Hold on. Do you recognize the person in this photo?

Ofc. Hadden: I believe that's Ms. Heard.

Ms. Bredehoff: All right. Is this the same person you saw on the night of May 21st, 2016 when you arrive sometime after 9:04 p.m.? And do you recall seeing the red marks that are reflected on this Exhibit Number 17 on Ms. Heard?

Ofc. Hadden: No, I was never this close to be able to examine her face.

Ms. Bredehoff: You were never close enough to Ms. Heard to be able to examine her face. Is that what you said?

Ofc. Hadden: Correct.

Ms. Bredehoff: Okay. If you had seen this mark close enough to be able to see it, would you have believed you had an obligation to prepare a report?

Ofc. Hadden: No, because I don't know what this is from. Right.

Ms. Bredehoft: Would you agree it's a red mark on her face?

Ofc. Hadden: From what I saw was red from her crying. There was no red marks from any other thing. It was consistent with her crying.

Ms. Bredehoft: All right. Does this look like a red mark that's from crying? Ofc. Hadden, in reviewing this picture, does it appear that there's an injury on Ms. Heard's face in this picture?

Ofc. Hadden: No.

Ms. Bredehoft: You would say that doesn't evidence an injury?

Ofc. Hadden: No.

Ms. Bredehoft: Why not?

Ofc. Hadden: Because I don't see an injury.

Ms. Bredehoft: I'm gonna show you what has been marked as deposition Exhibit Number 18. And do you recognize this carpeting?

Ofc. Hadden: No.

Ms. Bredehoft: Ofc. Hadden, what do you see in this picture?

Ofc. Hadden: I see stripes with some type of stains on to be a possible flooring.

Ms. Bredehoft: Okay. Do you have a recollection of seeing stains on the flooring outside of Ms. Heard's penthouse that night of May 21st, 2016?

Ofc. Hadden: At this point, not that I recall.

Ms. Bredehoft: And when you say at this point now that you can recall, what do you mean by that?

Ofc. Hadden: It's five years ago. I don't remember.

Ms. Bredehoft: Ofc. Hadden, I'm gonna show you what has been marked as Hadden Exhibit Number 19. Do you recognize the business card?

Ofc. Hadden: Yes.

Ms. Bredehoft: And tell me what you can recall of that?

Ofc. Hadden: Well, that's my handwriting and those are our LAPD business cards.

Ms. Bredehoff: All right. The next thing on there is refuse report. Do you see that?

Ofc. Hadden: Yes.

Ms. Bredehoff: Okay. Was it your understanding that Ms. Heard did not want to press charges?

Ofc. Hadden: She spoke with my partner and that's what my partner advised me.

Ms. Bredehoff: Okay. Were you ever in the room when Ms. Heard either "refused report or refused to press charges"?

Ofc. Hadden: I believe we offered her one final chance before we gave her the business card if she needed medical treatment or a report. And she declined at that time. And that's when we issued this business card.

Ms. Bredehoff: And what did you mean by report?

Ofc. Hadden: An official investigative report.

Ms. Bredehoff: Is that the victim's choice to write whether you write an official investigative report?

Ofc. Hadden: Yeah, a citizen can ask for a report for anything essentially with LAPD.

Ms. Bredehoff: But do you have an obligation as an LAPD patrol officer who write a report if you see injuries or property damage?

Ofc. Hadden: If there's evidence of a crime, yes.

Ms. Bredehoff: And when you say if there's evidence of a crime, would injuries and property damage constitute evidence of a crime?

Ofc. Hadden: If there's evidence of a crime, yes.

Ms. Bredehoff: Okay. Is there something different about what you're saying than what I'm asking? What I'm trying to understand when I say if you see evidence of injuries and property damage, is that evidence of a crime in your mind?

Ofc. Hadden: Yes. If the person didn't do it themselves, I mean, I can damage my own property. It's not a crime.

Ms. Bredehoff: Okay. Did you have any reason to believe that Amber Heard created any injuries to herself or to the property at the time you were there on May 21st, 2016?

Ofc. Hadden: No, because I don't recall seeing any damaged property or her obtaining any injury, or having invisible injuries that I saw.

Ms. Bredehoff: Now, it says "Advised can call at later time if changes mind." What if any discussion did you have with Ofc. Saenz about what that meant?

Ofc. Hadden: Well, that goes with what I said earlier was a citizen can make a report about anything at any time. It's called investigative report or just an incident report. So if she wanted a report, then she calls back and will take a report.

Ms. Bredehoff: But at that point you have already written into your system that the victim advised verbal dispute only, correct?

Ofc. Hadden: Correct.

Ms. Bredehoff: And you did not write a report, or take pictures, or create any kind of record. Did you of anything that transpired there?

Ofc. Hadden: Just the business card.

Ms. Bredehoff: I'm gonna ask you, Ofc. Hadden, to take a look at what has been marked as deposition Exhibit Number 24. And do you recognize the person in this picture?

Ofc. Hadden: Ms. Heard.

Ms. Bredehoff: And do you recognize her as Ms. Heard?

Ofc. Hadden: No, I had no idea who she was.

Ms. Bredehoff: Do you recognize the person in this picture on Hadden Exhibit Number 24 as the person who was the subject of your and Ofc. Saenz's reporting to the Eastern Columbia Building that evening?

Ofc. Hadden: Correct.

Ms. Bredehoff: All right, so let's go to Exhibit Number 24. And what do you see in this picture with respect to whether there is any injury depicted on Ms. Heard?

Ofc. Hadden: I see a female, White, fair skin with pink cheek.

Ms. Bredehoff: I'm sorry. With what?

Ofc. Hadden: Pink cheek and pink eyes.

Ms. Bredehoff: All right. Do you recognize that as a potential injury on her face?

Ofc. Hadden: Knowing what our investigation revealed, no, that pink is consistent with brown.

Ms. Bredehoff: What do you mean by what your investigation revealed?

Ofc. Hadden: That it was a verbal dispute and she refused that she had any injury.

Ms. Bredehoff: And just so we're clear again, you were never in the presence of Ms. Heard when she at any time said it was only a verbal dispute, correct?

Ofc. Hadden: Correct.

Ms. Bredehoff: Now, would you as a police officer investigating if you saw this, what's depicted in this picture, would you believe that you need to investigate further?

Ofc. Hadden: Yeah, I would need additional information. Just because I see a female with pink cheeks and pink eyes doesn't mean something happened. They should be sad and crying that their dog died.

Ms. Bredehoff: Did you engage in any further investigation?

Ofc. Hadden: No. The only investigation I did was part of speaking to my partner and then speaking with the witness. With the witness, the next door neighbor.

Ms. Bredehoff: And what did you discuss with the witness, the next door neighbor?

Ofc. Hadden: I tried to obtain information of what occurred.

Ms. Bredehoff: What did you ask?

Ofc. Hadden: Who, what, when, where, why.

Ms. Bredehoff: And what did he say?

Ofc. Hadden: I don't remember his exact words, but he wasn't very coming with the information. I had very vague information as far as what he was telling me.

Ms. Bredehoff: What do you specifically call the witness telling you?

Ofc. Hadden: I don't recall.

Ms. Bredehoff: You don't recall at all?

Ofc. Hadden: I don't recall specific words or sentences.

Ms. Bredehoff: Do you recall the witness taking you around and showing you property damage in the penthouse?

Ofc. Hadden: No, I recall my part when I'm doing a protective sweep and that's it.

Ms. Bredehoff: You don't recall Josh Drew being with you and taking you through?

Ofc. Hadden: I don't recall. I don't recall someone else was with us or not.

Ms. Bredehoff: Do you recall one way or the other?

Ofc. Hadden: I don't recall.

Ms. Bredehoff: All right. Now, you have a recollection of you and Ofc. Saenz going through the entire penthouse. Is that correct?

Ofc. Hadden: We did a protective sweep of the location that she was at.

Ms. Bredehoff: Tell me what you mean by protective sweep.

Ofc. Hadden: We walked through the general housing area that she is at to make sure that there's no one else in it that shouldn't be there or there's no, you know, no one hurt.

Ms. Bredehoff: Do you recall how many rooms you went through?

Ofc. Hadden: No. No, I don't know.

Ms. Bredehoff: I'm gonna ask you, Ofc. Hadden, to take a look at number 25. Do you recognize this as Ms. Heard?

Ofc. Hadden: Yes.

Ms. Bredehoff: All right. And do you see any injuries depicted on this picture?

Ofc. Hadden: No.

Ms. Bredehoff: I'm going to show you what has been marked as Exhibit Number 26. Do you recognize this as Ms. Heard?

Ofc. Hadden: Yes.

Ms. Bredehoff: Okay. Do you see any injuries in this picture?

Ofc. Hadden: No.

Ms. Bredehoff: I'm gonna ask you the same question, Exhibit Number 27. Do you recognize this as Ms. Heard?

Ofc. Hadden: Yes.

Ms. Bredehoff: And do you see any injuries in this picture on Ms. Heard?

Ofc. Hadden: No.

Ms. Bredehoff: I'm gonna ask the same question. Ofc. Hadden, I'm gonna ask you to look at Hadden Exhibit Number 28. Do you recognize this as Ms. Heard?

Ofc. Hadden: Yes.

Ms. Bredehoff: And do you see any injuries depicted on Ms. Heard's face in this picture?

Ofc. Hadden: No.

Ms. Bredehoff: I'll show you Exhibit Number 29. Do you recognize this as Ms. Heard?

Ofc. Hadden: Yes.

Ms. Bredehoff: Do you see any injuries on Ms. Heard in this picture?

Ofc. Hadden: No.

Ms. Bredehoff: Now, you indicated that you and Ofc. Saenz went through the apartment, correct?

Ofc. Hadden: Correct. We did a protective sweep.

Ms. Bredehoff: Protective sweep. And in doing the protective sweep, you did go in the room, correct?

Ofc. Hadden: Well, I mean, I don't know exactly where we went, but we walked around what she claimed was her living quarter.

Ms. Bredehoff: Would you agree that if Ms. Heard displayed injuries at the time that you reported to her residence after the domestic violence call that you would have had an obligation to prepare a report?

Ofc. Hadden: If there was injuries or a complaint of pain, yes.

Ms. Bredehoft: I'm sorry. Injuries or what?

Ofc. Hadden: Complaint of pain.

Ms. Bredehoft: Would you agree that if Ms. Heard displayed injuries that you perceive to be injuries at the time you reported to Ms. Heard's residence after the domestic violence call on May 21st, 2016, you had an obligation to prepare a report?

Ofc. Hadden: If I perceive them to be injuries, then yes.

Ms. Bredehoft: Okay. Would you agree that if there was property damage present at the time you reported to Ms. Heard's residence after the domestic violence calls, you had an obligation to prepare a report?

Ofc. Hadden: No, because if she's living there, that's her property and she's being uncooperative, and doesn't say that someone else did it or anyone else did it, then I have no other information to go offer. She could have broken it herself.

Ms. Bredehoft: Ofc. Hadden, did you provide any pamphlets to Ms. Heard, you or Ofc. Saenz, relating to domestic violence?

Ofc. Hadden: I personally did not.

Ms. Bredehoft: Do you know whether Ofc. Saenz did?

Ofc. Hadden: I don't know.

Mr. Chew: And ladies and gentlemen, at this point counsel for Mr. Depp takes over the question. Did you see Ms. Heard's face on the evening of May 21, 2016?

Ofc. Hadden: Yes.

Mr. Chew: On how many occasions did you see her face?

Ofc. Hadden: I believe two.

Mr. Chew: And the first time you saw her face, how close to her were you?

Ofc. Hadden: I don't recall exactly. I think it was approximately 10 feet.

Mr. Chew: Did you perceive any... Did you have any problems with your eyesight at that time?

Ms. Bredehoft: Objection.

Mr. Chew: Did you have 20/20 vision as of May 21, 2016?

Ofc. Hadden: No, I wear contacts though. So I can't see perfectly fine.

Mr. Chew: Were you wearing your contacts that evening?

Ofc. Hadden: Yes.

Mr. Chew: Did you have any trouble seeing the contours of her face the first time you saw her that evening?

Ms. Bredehoff: Objection.

Mr. Chew: Did you perceive any signs of injury on her face or anywhere else on her body that was visible to you?

Ofc. Hadden: No.

Mr. Chew: For how long a period did you view her face the first time you saw her that night?

Ofc. Hadden: A few seconds. Not very long.

Mr. Chew: And how much later was the second time you saw Ms. Heard?

Ofc. Hadden: Right before we left.

Mr. Chew: And how close to her were you when you observed her face?

Ofc. Hadden: Approximately 10 feet.

Mr. Chew: Did you have a clear view of her face?

Ofc. Hadden: Yes.

Mr. Chew: Did you still have your contacts in at the time?

Ofc. Hadden: Yes.

Mr. Chew: Was there sufficient light that enabled you to actually see her face?

Ofc. Hadden: I believe so. I believe the light was a little dimmer, but it was still lit.

Mr. Chew: Did you perceive any signs of injury to her face on that second occasion?

Ofc. Hadden: No.

Mr. Chew: Did you see any swelling of any kind on her face either during the first time you saw her or the second time you saw her that night?

Ofc. Hadden: No.

Mr. Chew: Did you see any marks on her face either the first time you observed her that night or the second time you observed her?

Ofc. Hadden: Just the redness which was consistent with her crying.

Mr. Chew: Did you see any time that night any indication of any bruising on her face?

Ofc. Hadden: No.

Mr. Chew: Did you see at any time that evening any indication or any sign whatsoever of any injury to her face?

Ofc. Hadden: No.

Mr. Chew: And going to your... Was it the security? What was the term you used? The security sweep, is that correct?

Ofc. Hadden: Protective sweep.

Mr. Chew: Protective sweep. During your protective sweep, was your access barred to any part of the penthouse?

Ofc. Hadden: My access what? Sorry.

Mr. Chew: Did you have free access to the penthouse?

Ofc. Hadden: The witness that was there, he kind of... I believe he guided us kind of through the place. I don't know, you know, wherever he guided us through.

Mr. Chew: Did you see any broken glass anywhere in the penthouse where you did the protective sweep?

Ofc. Hadden: Not that I remember.

Mr. Chew: Were you looking for any signs of a disturbance?

Ofc. Hadden: Yes.

Mr. Chew: Why were you looking for signs of a possible disturbance?

Ofc. Hadden: Signs of any evidence that a crime has occurred.

Mr. Chew: Is that part of... Is that standard procedure a police procedure?

Ofc. Hadden: Yes.

Mr. Chew: And why do you look for potential signs of vandalism or disturbance to property in the course of a domestic violence allegation or possibility?

Ofc. Hadden: Just because that tends to happen when some type of domestic altercation occurs between two people.

Mr. Chew: Did you see any sign of any kind of property damage or vandalism that evening?

Ofc. Hadden: Not that I recall.

Mr. Chew: Did you see any signs of spilled wine on the floor?

Ms. Bredehoff: Objection.

Ofc. Hadden: Not that I recall if they were visible or completely plain.

Mr. Chew: Do you recall some questioning from Ms. Heard's counsel, Ms. Bredehoff, about a man who led you through the penthouses on the evening of May 21, 2016?

Ofc. Hadden: Yes.

Mr. Chew: Did you describe him as uncooperative?

Ofc. Hadden: Yes.

Mr. Chew: Let me ask another question. Was he cooperative with your inquiries that evening?

Ofc. Hadden: No.

Mr. Chew: What do you mean by that?

Ofc. Hadden: I attempted to gather information of who the husband was and what occurred, and where he possibly went. So we could interview kind of all the different parties and he wouldn't give me a name of who the husband was.

Mr. Chew: And how long did you interact with that person, who in fact is Josh Drew?

Ofc. Hadden: I'd say approximately 5 to 10 minutes.

Mr. Chew: Did he report to you in words or substance that any domestic violence had occurred?

Ofc. Hadden: I don't recall any exact verbiage he said.

Mr. Chew: Did he report to you in words or substance any vandalism?

Ofc. Hadden: No, not that I recall.

Mr. Chew: On the evening that you and your partner got a call to the penthouse on May 21, 2016, were you and your partner in a particular hurry to close out of this incident?

Ofc. Hadden: No.

Mr. Chew: And were you willing to stay as long as it was necessary to resolve the matter?

Ofc. Hadden: Yes.

Mr. Chew: Would you generally take notes for a verbal dispute only?

Ofc. Hadden: When we disable the call or we get rid of the call, we leave our comments of what occurred and what we did in that call.

Mr. Chew: Would you generally write a report for a verbal dispute only?

Ofc. Hadden: No, unless it's at the request of one of the party.

Mr. Chew: When you were typing in your computer to add text to a call, is it common to refer to the focused individual in the call as a victim whether a crime has been committed or not?

Ofc. Hadden: Yes, because that's how the call was broadcasted and created.

Mr. Chew: Ladies and gentlemen, at this point, counsel for Ms. Heard completes the questioning.

Ms. Bredehoft: Now, there was another woman that was present as well, correct? That night.

Ofc. Hadden: I believe so, yes.

Ms. Bredehoft: Do you remember testifying earlier that at the end, she was holding and embracing Ms. Heard?

Ofc. Hadden: Yeah, I believe she's sitting on the couch with her until we left.

Ms. Bredehoff: Did you interview that woman?

Ofc. Hadden: No. She was with Ms. Heard when my partner was speaking with her, I believe. I never spoke to her.

Ms. Bredehoff: Okay. Did you ever attempt to interview that woman that was on the couch who was embracing Ms. Heard?

Ofc. Hadden: No, because I was speaking with the gentleman outside.

Ms. Bredehoff: Do you know whether Ofc. Saenz ever attempted to interview that woman who was sitting on the couch?

Ofc. Hadden: I'm unaware.

Ms. Bredehoff: Okay. Now, let's go back to the description that you gave and you responded again to it with Mr. Chew that she was crying and had a red face. And you said the redness was consistent with crying. Do you recall that?

Ofc. Hadden: Yes.

Ms. Bredehoff: Okay. Why was she crying?

Ofc. Hadden: I don't know. That's a great question. I don't know why she was crying.

Ms. Bredehoff: Did you ask her?

Ofc. Hadden: I personally did not because my partner interviewed her.

Ms. Bredehoff: Then when you downloaded with your partner later, did you ask Ofc. Saenz why Amber Heard was crying?

Ofc. Hadden: No. My partner never advised me she spoke with her while I was speaking with the gentleman.

Ms. Bredehoff: Do you recall that you testified that there was another woman who was embracing Ms. Heard on the sofa at the end of your visit?

Ofc. Hadden: Yes.

Ms. Bredehoff: Do you recall asking why she was embracing and holding Ms. Heard? Why did you not ask either the other woman or Ms. Heard why the woman was embracing and holding Ms. Heard?

Ofc. Hadden: Well, I did not is because we were trained in the academy to separate the parties and to try, and attempt to build a rapport with the

individual we're speaking with. Therefore, it was two females and my partner was female. So therefore my partner spoke with the female.

Ms. Bredehoff: Would it be fair to say you deferred to Ofc. Saenz to conduct any type of investigation with both Ms. Heard and the other woman who was embracing her?

Ofc. Hadden: I know my partner spoke with Ms. Heard. I am unaware. I cannot testify if she spoke with the other female.

Ms. Bredehoff: When you said you learned at the academy to divide up the parties, was it your understanding that parties meant the victim and the suspect?

Ofc. Hadden: All parties.

Ms. Bredehoff: Do you know whether anyone made an attempt to divide up the woman from Ms. Heard, the woman that was embracing her?

Ofc. Hadden: I'm unaware.

Ms. Bredehoff: Okay. Now, the redness that you said was on Ms. Heard's face when she was crying and emotional, could it also have been consistent with injury?

Ofc. Hadden: I do not think so. I had perceived it as redness from crying.

Ms. Bredehoff: Did you consider whether the redness on the face might be from something in addition to crying?

Ofc. Hadden: No, I do not.

Ms. Bredehoff: And you had never met Ms. Heard before, correct?

Ofc. Hadden: Never. Never even seen her.

Ms. Bredehoff: And would it be fair to say that you don't know what Ms. Heard's...what her characteristics are for swelling, bruising, redness. Correct?

Ofc. Hadden: Correct.

Ms. Bredehoff: I'm going to ask you, Ofc. Hadden, to look at what has been marked as Hadden Exhibit Number 8 and it's from the Office of the Chief of Police, and it's dated November 24, 2014. And the subject is Domestic Violence Supplemental Report Form 15.40.02 Revised. Do you see that?

Ofc. Hadden: I do. This was provided to us by the LAPD in response to our document requests.

Ms. Bredehoff: Did you have an understanding that there was a Domestic Violence Supplemental Report Form that was in place as of May 21st, 2016?

Ofc. Hadden: Yes.

Ms. Bredehoff: I'm gonna show you what is Exhibit Number 9 and this is called Domestic Violence Supplemental Report, and it is something... Is it your understanding that the police officer fills this out?

Ofc. Hadden: Yes, that we fill out.

Ms. Bredehoff: Okay. Do you recall whether you had filled out this supplemental report at any time prior to May 21st, 2016?

Ofc. Hadden: I don't recall.

Ms. Bredehoff: Now, if you look at the first column on the Domestic Violence Supplemental Report, it has a column that says, "victim," and then there are a number of descriptive words underneath with boxes. Do you see that?

Ofc. Hadden: I do.

Ms. Bredehoff: All right. Now, the first one is shaking. What if any observations did you make of Ms. Heard shaking?

Ofc. Hadden: No, I don't recall.

Ms. Bredehoff: All right. What if any observations did you make about Ms. Heard being unresponsive?

Ofc. Hadden: The little time I dealt with her, yeah, she was unresponsive and crying.

Ms. Bredehoff: I'm sorry. I didn't catch the first part. She was unresponsive and crying, did you say?

Ofc. Hadden: Yes.

Ms. Bredehoff: Okay. And I guess you've answered the third one here that she was crying, correct?

Ofc. Hadden: Yes.

Ms. Bredehoff: All right. And what if any observations did you make whether Amber Heard was scared?

Ofc. Hadden: I didn't.

Ms. Bredehoff: You didn't what?

Ofc. Hadden: I did not observe.

Ms. Bredehoff: I'm sorry. Are you finished with that answer? It sounded like it was a half. I just wanna make sure you were finished.

Ofc. Hadden: Yeah, I did not observe her being fearful.

Ms. Bredehoff: Okay. But Ms. Heard did not want to file a report, correct?

Ofc. Hadden: Correct.

Ms. Bredehoff: She did not want to press charges, correct?

Ofc. Hadden: Correct.

Ms. Bredehoff: And she did not want to tell you the name of her husband, correct?

Ofc. Hadden: No, because they're actor.

Ms. Bredehoff: Well, do you recall testifying earlier that Ms. Heard was uncooperative?

Ofc. Hadden: Yes, she was uncooperative with my partner.

Ms. Bredehoff: All right. And do you recall testifying that Ms. Heard was uncooperative because she was emotional, she was crying, she wasn't sure whether she wanted to file a report or not, and she was not when she said she did not want to?

Ofc. Hadden: Yes, that's what she had spoke with my partner about.

Ms. Bredehoff: Do you know why Ms. Heard did not want to file a report and did not wanna press charges?

Ofc. Hadden: No, I did not.

Ms. Bredehoff: Ofc. Hadden, I'm gonna show you what has been marked as Deposition Exhibit Number 10 and I'm gonna have you look at it. It starts out with field notebook divider, Domestic Violence Laws LAPD Form 18.30.02 and it has the date. This is the date of January 31, 2010 at the bottom in the footnote. I'm going to just direct your attention

here to case preparation and this is relating to domestic violence laws. Case preparation says, "Note the complainant's emotional and physical condition." Do you see that?

Ofc. Hadden: Yes.

Ms. Bredehoff: Okay. And then "Ensure all evidence is gathered and preserved e.g., bloody clothing, damaged bones, damaged property." Do you see that?

Ofc. Hadden: Yes.

Ms. Bredehoff: Okay. Did you or Ofc. Saenz provide any kind of notes relating to Ms. Heard's emotional and physical condition on May 21, 2016?

Ofc. Hadden: No.

Ms. Bredehoff: Did you or Ofc. Saenz ensure all the evidence was gathered and preserved including the damaged property?

Ofc. Hadden: I said no, and all these things would have been documented if there was a report.

Ms. Bredehoff: All right. Let's go to the next bullet point that says, "Ensure photographs are taken of injuries or lack of injury to complainant and accused, both the day of and after." Did you take any photographs to show a lack of injury?

Ofc. Hadden: No.

Ms. Bredehoff: Did you take any photos to show a lack of damage?

Ofc. Hadden: No.

Ms. Bredehoff: All right. And then this next one is "Ensure photographs are taken of the scene and damaged property, etc." So, I've already asked you that one. So let's go to the next one. Canvas location and interview all witnesses, including children, neighbors, law enforcement. Did you do that in this instance?

Ofc. Hadden: Yes.

Ms. Bredehoff: Who did you interview?

Ofc. Hadden: I spoke with the gentleman.

Ms. Bredehoff: All right. Anyone else?

Ofc. Hadden: No, that's it.

Ms. Bredehoff: Now, there were two females present in addition to Ms. Heard. Were there not?

Ofc. Hadden: Yes. Including her, I believe there's two.

Ms. Bredehoff: You don't recall the third woman there?

Ofc. Hadden: No, I don't recall a third one being there.

Ms. Bredehoff: All right. Did you ask if there was anybody else that was present who had witnessed any aspect of this?

Ofc. Hadden: I don't recall exactly, but all right.

Ms. Bredehoff: Let's go to Exhibit Number 11. So, what did you determine this call was after your investigation?

Ofc. Hadden: A dispute, a verbal dispute. It's not against the law to argue. I argue in my life.

Ms. Bredehoff: So you decided that there was only a verbal dispute, therefore it didn't constitute domestic violence.

Ofc. Hadden: From the information or lack of information I was able to receive from the witness and the information my partner gathered, yes.

Ms. Bredehoff: Is it your understanding that a police officer can be brought up on charges of misconduct if they engage in neglect of duty?

Ofc. Hadden: Yes.

Ms. Bredehoff: All right. Is it also your understanding that a police officer can be brought up on misconduct charges at the LAPD if they violate department policies, rules, or procedures?

Ofc. Hadden: Yes.

Ms. Bredehoff: And is it your understanding that a police officer can be brought up on charges of misconduct if they engage in conduct, which may tend to reflect unfavorably upon the employee or the department?

Ofc. Hadden: Yes.

Judge Azcarate: All right. Thank you. Your next witness is by deposition also. I assume you need a few minutes to switch that out or are you ready to...

Ms. Lecaroz: We're ready.

Ms. Bredehoff: Actually, I think we still have an exhibit we're working on [inaudible 00:54:53]

Ms. Lecaroz: Oh, I think that's right.

Judge Azcarate: Okay. Why don't we go ahead... It's early, but let's go ahead and take our morning recess for 15 minutes, so we can take care of that and get it set up for the next deposition. Okay. So don't talk to anybody, don't do any outside research. All right? All right, which exhibit did you...

Ms. Bredehoff: Well, I think we're agreeing, Your Honor. It's just the redactions that we want to...

Judge Azcarate: Okay. Which deposition is next?

Ms. Lecaroz: Ofc. William Gatlin, Your Honor.

Judge Azcarate: Ofc. William Gatlin.

Ms. Bredehoff: It's with him. So we did the redactions that we discussed. I don't know how to...

Ms. Lecaroz: I haven't seen it yet, so I just need to confirm.

Judge Azcarate: All right. Well, then go ahead and take the 15 minutes. And when I come back, we can we can figure it out.

Ms. Bredehoff: Because I don't think we are disagreeing with anything else.

Judge Azcarate: Okay. And how long is this deposition?

Ms. Lecaroz: I believe it's around 35 minutes, Your Honor.

Ms. Bredehoff: Okay. So we'll be able to start the next one right after at.

Ms. Lecaroz: We should be. So yes.

Judge Azcarate: So why don't you go ahead and get the exhibits for the next one after that as well, and I'll come back at 11:20. And we can do both of them. Okay?

Ms. Bredehoff: Thank you, Your Honor.

Ms. Lecaroz: Thank you, Your Honor.

Judge Azcarate: All right. Are we ready for the jury then?

Ms. Bredehoff: Yes, Your Honor.

Judge Azcarate: Okay.

Ms. Lecaroz: Yes, Your Honor. So foreign.

Judge Azcarate: All right, thank you. Put your next witness.

Ms. Lecaroz: Your Honor, can we call on Ofc. William Gatlin?

Judge Azcarate: Okay, Ofc. Gatlin. Could you spell the last name for me and for the court reporter?

Ms. Lecaroz: G-A-T-L-I-N.

Judge Azcarate: Okay, thank you.

Ms. Bredehoft: Name and business address for the record.

Ofc. Gatlin: William Gatlin. Business address, 251 E. 6th Street in Los Angeles, California, 90014.

Ms. Bredehoft: How long have you been an officer with the LAPD?

Ofc. Gatlin: Eight years.

Ms. Bredehoft: And what is your rank?

Ofc. Gatlin: Police Officer 2.

Ms. Bredehoft: Now, your partner on May 21, 2016 was Ofc. Diener. Is that correct?

Ofc. Gatlin: Yes.

Ms. Bredehoft: You were wearing your body cam on May 21, 2016?

Ofc. Gatlin: Yes.

Ms. Bredehoft: When were you first assigned body cameras?

Ofc. Gatlin: Sometime in 2015, I think. You know, I don't remember.

Ms. Bredehoft: Ofc. Gatlin, I'm gonna show you what has been marked as defendant's Exhibit Number 6 and I'm going to go ahead and go down to the second page. And this is the incident recall for you and Ofc. Diener for May 21, 2016 in connection with the call at the Eastern Columbia Building, 849 South Broadway. Now, Ofc. Diener indicated that he believed that he was driving that night. Is that your recollection as well?

Ofc. Gatlin: Yes.

Ms. Bredehoff: When Ofc. Diener is driving, what does that mean you're doing?

Ofc. Gatlin: It means I handle the computer.

Ms. Bredehoff: Based on the incident recall, when did you arrive at the scene, you and Ofc. Diener?

Ofc. Gatlin: We arrived at scene, it looks like at 22:24.

Ms. Bredehoff: And that is 10:24?

Ofc. Gatlin: Correct.

Ms. Bredehoff: So when you arrived, do you recall whether there were any other police officers that were on the scene?

Ofc. Gatlin: I do not believe there was.

Ms. Bredehoff: Do you recall whether there was any press on the scene?

Ofc. Gatlin: I do not believe there was.

Ms. Bredehoff: Do you recall whether there was any type of public gathering at all?

Ofc. Gatlin: No.

Ms. Bredehoff: Okay. Was it relatively quiet?

Ofc. Gatlin: From my recollection, yes.

Ms. Bredehoff: Did you see very many people in the lobby when you came through?

Ofc. Gatlin: Not that I remember.

Ms. Bredehoff: Okay. And then tell me what you recall of this incident once you got there and you were shown to the elevator.

Ofc. Gatlin: I remember we went up the elevator, exited the elevator. We walked down the hallway until we found the unit number, knocked on the door. A male answered the door and at that point... I mean, at that point, I really didn't know whether this guy is potentially the suspect, if this guy is involved in the altercation, or who this guy was. So he kind of talked to him for a second and he advised us that the police had already been there. He had a business card from them and we told him that we still needed to step inside to check on the subject or potential victim just to

make sure that she's okay, and that this is indeed related to the previous incident and not a new incident where the suspect had potentially returned, or there's another new issue at hand.

Ms. Bredehoff: So, do you recall that you already knew that this place had...that another officer had answered the call or other officers had answered the call before you got there?

Ofc. Gatlin: Yes, I already knew there was a previous caller.

Ms. Bredehoff: And how did you know that?

Ofc. Gatlin: We're just kind of keeping track. When you're on the computer, you kind of are able to keep track of the calls throughout the night and where they're at, and what's going on.

Ms. Bredehoff: And did you know that Officers Saenz and Hadden had been the ones who had answered the call earlier?

Ofc. Gatlin: I believe so.

Ms. Bredehoff: Okay. Did you speak with Ofc. Saenz or Ofc. Hadden before you went to the Eastern Columbia Building?

Ofc. Gatlin: No.

Ms. Bredehoff: I'm going to take you down to the same exhibit. The page that's date-stamped numbered LAPD11 and I'm going to ask you. This is a TOMSG Data Logged. Do you recognize this document?

Ofc. Gatlin: I've never seen this before. I've never seen one of these documents before.

Ms. Bredehoff: All right. Do you have a recollection of receiving an administrative message at 22:22:30 which would be 10:22:30 saying, "Incident 4756 is the same incident as yours. 1A1 handled earlier. Doubt she called back probably just delayed response."

Ofc. Gatlin: I do not recall getting that message.

Ms. Bredehoff: Right below it at 22:23:22 which is 10:23 and change, it shows that your unit responded with "Rog," in other words roger to that message. Do you see that?

Ofc. Gatlin: Yes.

Ms. Bredehoff: Would that have been you that did that or would that have been Ofc. Diener?

Ofc. Gatlin: Probably me.

Ms. Bredehoff: Okay. And is that because you weren't driving and Ofc. Diener was?

Ofc. Gatlin: Yes.

Ms. Bredehoff: Okay. So does this refresh your recollection of what had been communicated to you and why you knew that someone had already answered this call earlier?

Ofc. Gatlin: Yes.

Ms. Bredehoff: Are you familiar with the term cycle of violence?

Ofc. Gatlin: Yes.

Ms. Bredehoff: Well, typically, do you make arrests on domestic abuse calls?

Ofc. Gatlin: You know, sometimes we do and sometimes the other party is no longer at scene and we would just take a report.

Ms. Bredehoff: Okay. Are there times where they just refused to cooperate and you just left?

Ofc. Gatlin: Yeah, but... Yeah, there are terms like that.

Ms. Bredehoff: You were going to say, but what?

Ofc. Gatlin: I guess like the totality of the circumstance based on... Just because someone's uncooperative doesn't automatically mean that we'll just leave, you know. If we're, you know, observe some kind of injuries or if there's a third-party witness that's cooperative that could lean in or even if the victim's uncooperative, that would still take some sort of action.

Ms. Bredehoff: Now, I'm going to ask you to turn to page 13 here and this is the CAD summary report. What if any involvement did you have in this?

Ofc. Gatlin: So, I would be the one that kind of closes out the incidents on the computer. So, the writings over to the right of the screen would be what I would type into the computer to close out the call.

Ms. Bredehoff: And so you would have typed in "Related to previous incident, verbal argument only, checked residents"?

Ofc. Gatlin: Yes.

Ms. Bredehoff: Who told you that it was a verbal argument only?

Ofc. Gatlin: Based on the knowledge I had of the previous call, I'm able to see potentially how they closed out the call and I could have seen it from there.

Ms. Bredehoff: So you could have gotten this from A1A?

Ofc. Gatlin: 1A1.

Ms. Bredehoff: Yeah, their report, Ofc. Saenz and Ofc. Hadden and then just repeated it here.

Ofc. Gatlin: Yes.

Ms. Bredehoff: Okay. Do you have any recollection of anyone in the apartment up in Penthouse 3 saying that there had been a verbal argument only?

Ofc. Gatlin: Not to my recollection.

Ms. Bredehoff: So, let me just jump back to the events of May 21 for a moment. Were you aware that that was the apartment of Johnny Depp and Amber Heard?

Ofc. Gatlin: No.

Ms. Bredehoff: When did you first become aware of that?

Ofc. Gatlin: I don't remember.

Ms. Bredehoff: Are we talking about months, days, hours?

Ofc. Gatlin: It was a couple days.

Ms. Bredehoff: And do you remember how you learned of it?

Ofc. Gatlin: No, I don't.

Ms. Bredehoff: And did you know who Johnny Depp was at that time?

Ofc. Gatlin: Yeah.

Ms. Bredehoff: And were you a fan of Johnny Depp's as of May 21, 2016?

Ofc. Gatlin: I guess I've liked a couple of his movies. I'm not like, rushing out to go see him or anything. I don't know.

Ms. Bredehoff: Are you a fan of Johnny Depp's today?

Ofc. Gatlin: I can remember the last movie that I saw of his.

Ms. Bredehoff: Did you know who Amber Heard was as of May 21, 2016?

Ofc. Gatlin: I was aware that there was an actress by the name of Amber Heard, but I was not totally familiar with her or any of her work.

Ms. Bredehoff: When you saw the name Amber Heard on the incident recalls, did it register with you that she was an actress?

Ofc. Gatlin: No.

Ms. Bredehoff: Did you recognize Amber Heard when you came to the apartment on May 21, 2016?

Ofc. Gatlin: No.

Ms. Bredehoff: How close did you come to Amber Heard while you were in the apartment?

Ofc. Gatlin: I've had to say probably between 10 and 15 feet.

Ms. Bredehoff: And what was the lighting like where Amber Heard was sitting?

Ofc. Gatlin: It's pretty dim.

Ms. Bredehoff: Did you ask to see Amber Heard's face in the light?

Ofc. Gatlin: No.

Ms. Bredehoff: Did you ask Amber Heard whether she had any injuries?

Ofc. Gatlin: No.

Ms. Bredehoff: Did you interview any of the persons present about what had taken place earlier that night?

Ofc. Gatlin: No.

Ms. Bredehoff: Why not?

Ofc. Gatlin: Because I was aware that there's a previous call regarding the incident and the male that answered the door kinda made it clear to us that this is still left over from that same incident, and that a new incident had not occurred. So I didn't feel the need to at that time.

Ms. Bredehoff: Did you go through and search the entire apartment, including bedrooms, offices, and other areas?

Ofc. Gatlin: No.

Ms. Bredehoff: Then why not?

Ofc. Gatlin: It's the same as I explained earlier and they were all adamant that her husband was no longer at scene.

Ms. Bredehoff: Did you go into any of the other adjoining apartments?

Ofc. Gatlin: No.

Ms. Bredehoff: You asked where the husband was. Why did you ask where the husband was?

Ofc. Gatlin: Because in the comments of the call, it stated the husband and wife are arguing.

Ms. Bredehoff: Okay. And it was also a domestic violence call.

Ofc. Gatlin: Yeah. It's domestic violence call and it wouldn't be uncommon for, you know, the male to answer the door to tell us that he's not the husband and later it turns out that he is. So you know, we kinda have to talk to the other party involved to make sure that that's not the male that's involved in the argument.

Ms. Bredehoff: Did any of the four people that were in the apartment identify Johnny Depp as that male?

Ofc. Gatlin: No.

Ms. Bredehoff: Was there any effort by any other people in that apartment to get you to press charges or investigate further?

Ofc. Gatlin: No.

Ms. Bredehoff: Would you say that people were reluctant to even have you come into the apartment?

Ofc. Gatlin: It felt that way.

Ms. Bredehoff: And what happened? What occurred that made you feel like that too that they didn't want you in the apartment?

Ofc. Gatlin: Just the way that the male was acting that answered the door and he kinda just said, "Oh, let me just go grab the business card from the previous call." And then even so when we had went inside, it didn't seem like anybody was particularly eager to talk to us.

Ms. Bredehoff: I'm going to ask you to take a look at Exhibit 1, defendant's Exhibit 1. And this is the Daily Mail, MailOnline, July 3rd, 2020. And I'm going to go down to the 10th page. What if any evidence did you observe when you went to the penthouse on May 21, 2016 that Amber Heard and her friends were attempting to concoct an abuse hoax to set up Johnny Depp to be accused of domestic violence?

Ofc. Gatlin: None that I can recall.

Ms. Bredehoff: What if any evidence did you see of Amber and her friends spilling wine and roughing the place up?

Ofc. Gatlin: None.

Ms. Bredehoff: And what if any evidence did you see that Amber and her friends had concocted and gotten their story straight, and were relaying them to you when you arrived?

Ofc. Gatlin: None.

Ms. Bredehoff: Did Amber or her friends at any time while you were at the apartment on May 21, 2016 claim that Johnny Depp had committed domestic violence of Amber?

Ofc. Gatlin: Not to me. They didn't.

Ms. Bredehoff: Did you see them do that to Ofc. Diener?

Ofc. Gatlin: No.

Ms. Bredehoff: What if any efforts did Amber Heard make to come over and to show you any evidence of injuries?

Ofc. Gatlin: None.

Ms. Bredehoff: And what if any effort did Amber Heard or her friends make to try to show you any type of property damage?

Ofc. Gatlin: None.

Ms. Bredehoff: And what if any evidence do you have that Amber or her friends placed a second call to 911?

Ofc. Gatlin: I don't have any evidence that it was one of her friends. I just know that there's a second call placed. Actually if I can recall, I think it said that her friend was on the phone with her and her arguing with her husband.

Ms. Bredehoff: Who said that?

Ofc. Gatlin: I believe that's what the incident recall said.

Ms. Bredehoff: Did you ever provide a sworn deposition saying that you signed no evidence of a crime at the penthouse before today?

Ofc. Gatlin: No.

Ms. Bredehoff: Are you aware of whether Ofc. Diener provided a sworn deposition saying he's found no evidence of a crime?

Ofc. Gatlin: He has not.

Ms. Bredehoff: Now, this call came in at 20:30 which is approximately 8:30 regular time, p.m., right?

Ofc. Gatlin: Yes.

Ms. Bredehoff: Okay. And then a little bit further down just seven minutes later comes a duplicate call that appears to come from the New York Police Department?

Ofc. Gatlin: Yes.

Ms. Bredehoff: Roughly seven minutes of each other, correct?

Ofc. Gatlin: Yes.

Ms. Bredehoff: Did you see that when you were looking back and trying to look at the history?

Ofc. Gatlin: I believe I saw all of this.

Ms. Bredehoff: Did you see in any of the incident recalls or any of the documentation that you reviewed that the officers, Officers Saenz and Hadden reported to the scene, left the scene, closed out, and then another call was made to come to 849 South Broadway?

Ofc. Gatlin: Yes.

Ms. Bredehoff: What did you see?

Ofc. Gatlin: The second call created was the one that we had received.

Ms. Bredehoff: And it says... This is 22:09 which would be 10:09, right? Roughly.

Ofc. Gatlin: Yes.

Ms. Bredehoff: It says, "Teletype from NYPDI came. Female stated she was on the phone with her friend. She began screaming at her husband.

Subject Amber Heard. Husband, Johnny Heard, male, 53 years old, 5'11", NFD NFI."

Ms. Bredehoff: Do you see that?

Ofc. Gatlin: Yes.

Ms. Bredehoff: Okay. But that's New York Police Department and back here it says, New York Police Department, correct?

Ofc. Gatlin: Correct.

Ms. Bredehoff: Okay. But after you communicated down here on the administrative text messages and I'm now on LAPD11, this is 22:22, you now know it's the same incident as yours and 1A1 handled earlier, "Doubt she called back, probably just delayed response." Correct?

Ofc. Gatlin: Yeah, this is just a message from another unit. So I mean, just because they're telling... They're basically just sending a message that it's related, you know. It doesn't mean that it's exactly the same call.

Ms. Bredehoff: By the time you showed up at the door of Penthouse 3 at the Eastern Columbia Building, you already knew that Ofc. Saenz had handled this call and you were just double checking to make sure that the perpetrator wasn't there, and that everybody was okay. Correct?

Ofc. Gatlin: I was aware that Ofc. Saenz had handled a call at that location earlier, but it doesn't mean that I have to...that I treat it as if it's handled already. We still have to get there, and speak to them, and make that determination that it's not a completely new incident.

Ms. Bredehoff: Okay. And you did that, right?

Ofc. Gatlin: Yes.

Ms. Bredehoff: And you put in the system for this call 20:46 to 21:22, "Met with vic, check location, verified husband left location. Victim advised verbal dispute and refused to give any further information." Actually, that was Hadden and Saenz, right?

Ofc. Gatlin: Yeah, that wasn't me. I didn't put that in.

Ms. Bredehoff: Then what you put in... That was why I couldn't find it, you put in 22:17 and I'm sure you weren't there until 3:01, but we have the officer did something like that, you put in, "Related to previous incident. Verbal argument only. Checked resident." Correct?

Ofc. Gatlin: Yes.

Ms. Bredehoff: Okay. And your putting verbal argument only was based on what you could review with Saenz and Hadden, correct?

Ofc. Gatlin: Yes.

Ms. Bredehoff: I'm going to show you what has been marked as defendant's Exhibit Number 2 and it's a picture, it's a portion of the video clip from the ECB building and it has 5/21/2016, and the time is 22:28:14. Do you recognize the person in this picture?

Ofc. Gatlin: Yes.

Ms. Bredehoff: And who is in this picture?

Ofc. Gatlin: Ofc. Diener.

Ms. Bredehoff: I'm going to ask you to take a look at defendant's Exhibit Number 3 and that's reflecting a video clip again. And it's dated 5/21/2016 and says 22:28:15. Do you recognize the person in this?

Ofc. Gatlin: Yes, that's me and Ofc. Diener.

Ms. Bredehoff: I'm going to show you now the video cam footage. I've got the two from yours and from Ofc. Diener. So I'm gonna go through and show those to you.

Ofc. Gatlin: Coffee's hot. We're around Penthouse 3. [inaudible 01:17:23]

Ofc. Diener: Hey, bud. We're stepping out onto the Penthouse 3.

Ofc. Gatlin: Hello. How's it going?

Josh: Officers, how are you doing?

Ofc. Gatlin: Doing all right.

Josh: You guys probably come here earlier already.

Ofc. Gatlin: Yes, we did.

Josh: Okay. I can't remember their names offhand. I have the card inside.

Ofc. Diener: Saenz maybe.

Ofc. Gatlin: Yeah. We got another call. I don't know if it's related to the same call from earlier or if somebody called again.

Josh: Probably.

Ofc. Gatlin: So we're just here to check.

Ofc. Diener: Do you guys know someone in New York or something?

Josh: Yeah, she have probably called twice.

Ofc. Gatlin: Okay. Can we just talk to your wife? We need to make sure [inaudible 01:18:43]

Josh: Oh, come on. Different conversation.

Ofc. Gatlin: Okay, yeah. Well, whoever it is, we're just gonna look up and we just gotta check on, and make sure they're all good.

Josh: I'll go get the business card from the cops. She's...

Ofc. Gatlin: Yeah. Just because we've got another call and we came again, we still got to make sure.

Josh: Hang on one second. Back up, back up.

Ofc. Gatlin: Can we just come in and just check? We just need to make sure everybody in here is okay, and that nobody...

Josh: They got the call twice.

Woman 3: Oh, they did?

Josh: Yeah.

Ofc. Gatlin: I don't know if she called twice or whoever called, but we just got another notification. So...

Woman 3: [inaudible 01:19:20]

Ofc. Gatlin: We just need to come in and make sure that everybody's okay.

Woman 3: We're okay.

Ofc. Gatlin: You're all good? Nobody else is in here?

Woman 3: No. The other officer came by and checked the apartment, and then other apartments as well. [inaudible 01:19:35]

Ofc. Gatlin: Okay. Who's Amber? You? Okay. And Johnny?

Josh: He's definitely not here.

Ofc. Gatlin: Here's not here? Okay.

Woman 3: He left probably like, two hours ago.

Ofc. Gatlin: Okay, all right. Everything's all good then?

Woman 3: Yeah, we're good.

Ofc. Gatlin: All right.

Woman 3: Thank you.

Ofc. Gatlin: Well, if you guys need anything else, just call us back.

Woman 3: Thank you very much.

Ofc. Gatlin: You have a good night. [inaudible 01:20:10.379]

Ms. Bredehoff: So this one is defendant's Exhibit Number 4.

Ofc. Gatlin: Coffee's hot. We're around Penthouse 3.

Ms. Bredehoff: Before we go further, I'm going to show you now the you're putting [inaudible 01:20:50] and it says 22:28:15. Do you recognize the person in this?

Ofc. Gatlin: Yeah, that's me and Ofc. Diener.

Ms. Bredehoff: I'm going to show you now the video cam footage. I've got the two from yours and from Ofc. Diener's. So I'm gonna go through and show those to you as well. So, this one is defendant's Exhibit Number 4.

Ofc. Gatlin: Coffee's hot. We're around Penthouse 3. [inaudible 01:21:28]

Ofc. Diener: Hey, bud. We're stepping out onto the Penthouse 3.

Ms. Bredehoff: Before we go further, can you tell whether this one is your video cam footage or it is Ofc. Diener's?

Ofc. Gatlin: This appears to be Ofc. Diener's.

Ms. Bredehoff: And so that's you over here?

Ofc. Gatlin: Yes.

Ms. Bredehoff: Can you tell whether it's you or Ofc. Diener that's saying "Officer Saenz"?

Ofc. Gatlin: I cannot tell.

Ms. Bredehoff: Okay. How did you know that it was Ofc. Saenz who'd been there?

Ofc. Gatlin: Because I was aware which unit had responded to the call there and I knew that she was working in that unit.

Ofc. Gatlin: I don't know if it's related to the same call from earlier or if somebody called again.

Josh: Probably.

Ofc. Gatlin: So we're just here to check.

Ofc. Diener: Do you guys know someone in New York or something?

Josh: Yeah, she have probably called twice.

Ofc. Gatlin: Okay. Can we just talk to your wife? We need to make sure [inaudible 01:18:43]

Josh: Oh, come on. Different conversation.

Ofc. Gatlin: Okay, yeah. Well, whoever it is, we're just gonna look up and we just gotta check on, and make sure they're all good.

Josh: I'll go get the business card from the cops. She's...

Ofc. Gatlin: Yeah. Just because we've got another call and we came again, we still got to make sure.

Josh: Hang on one second.

Ms. Bredehoff: Now would you say... And this is I'll represent this as Josh Drew and he's already provided testimony. Would you say that Josh Drew was discouraging you from even coming into the apartment or seeing Amber Heard?

Ofc. Gatlin: Yes.

Josh: Yeah.

Ofc. Gatlin: I don't know if she called twice or whoever called, but we just got another notification. So...

Woman 3: [inaudible 01:23:34]

Ofc. Gatlin: We just need to come in and make sure that everybody's okay.

Woman 3: We're okay.

Ofc. Gatlin: You're all good? Nobody else is in here?

Woman 3: No. The other officer came by...

Ms. Bredehoft: All right. Ofc. Gatlin, can you tell which one of these people is doing the talking of these three girls, women?

Ofc. Gatlin: I can't tell for sure, but it appears to me it's the girl in the middle. The one that's leaning forward with the white shirt.

Ms. Bredehoft: Do you know which one of these is Amber Heard?

Ofc. Gatlin: From this view, I can't tell.

Ms. Bredehoft: All right. Do you know what color hair the person that's the most forward that's in the middle has?

Ofc. Gatlin: I can't tell from this.

Ms. Bredehoft: Okay. Can you tell what color hair the woman, the furthest right that's in front?

Ofc. Gatlin: I can't tell. It looks like her head is in a shadow.

Ms. Bredehoft: Okay. Can you tell what color hair the person that's middle, but in the back?

Ofc. Gatlin: No, same. Everything looks like they're... The tops of their heads are in shadows.

Ms. Bredehoft: All right. And you believe that the one to the left is Amber Heard?

Ofc. Gatlin: No. I believe that that's the one that's doing most of the talking.

Woman 3: ... and checked the apartment, and then other apartments as well. [inaudible 01:25:01]

Ofc. Gatlin: Okay. Who's Amber? You? Okay. And Johnny?

Ms. Bredehoft: Did you see anybody acknowledge that they identify themselves as Amber?

Ofc. Gatlin: It looks like it was the girl sitting furthest away from me, furthest away from the camera.

Ms. Bredehoft: Okay. And how would you describe the lighting in there?

Ofc. Gatlin: Pretty dim and dark.

Ms. Bredehoff: You said earlier you thought you were 10 to 15 feet away. How much would you estimate now that you are looking at this on body cam? How far away are you from the two women?

Ofc. Gatlin: I would still say it's in that range.

Ms. Bredehoff: Did you get a clear look at any of these three women?

Ofc. Gatlin: I can't remember.

Ms. Bredehoff: And did you ask to have any of them come out into the lighting, so that you could take a better look at them to see if potentially they might have injuries?

Ofc. Gatlin: No.

Ms. Bredehoff: What perception did you have about the level of cooperation of these four individuals with your answer in this call?

Ofc. Gatlin: Pretty low level of cooperation.

Ms. Bredehoff: Okay. Now, can we... Can you bring up Exhibit Number 5? It's the other video. I just wanna run through both of them because there's a little bit of different angle in the two.

[01:26:27]

[Video]

[01:29:37]

Ms. Bredehoff: I'm now showing you the defendant's Exhibit Number 5 and let me just stop here for a minute. Does this appear to be the video cam from your video cam?

Ofc. Gatlin: Yes.

Ms. Bredehoff: Okay.

[01:30:15]

[Video]

[01:32:49]

Ms. Bredehoff: So I'm just stopping here again, on these three women. You had indicated before the woman that's leaning forward here that she's in the middle. Is that correct?

Ofc. Gatlin: It appears that way.

Ms. Bredehoff: And you think she's the one who did most of the talking, correct?

Ofc. Gatlin: Yeah. Right now she was the one talking.

Ms. Bredehoff: Okay. And you believe that Amber is the one in the back behind her?

Ofc. Gatlin: Yes.

Ms. Bredehoff: Are you able to see the right side of Amber's face?

Ofc. Gatlin: From this camera view, it looks like she's kind of facing straight towards me, so I would have been able to see the right side of her face from there.

Ms. Bredehoff: Would you have been able to see it clearly?

Ofc. Gatlin: Due to the low lighting, probably not very clearly.

Ms. Bredehoff: Okay.

[01:33:43]

[Video]

[01:33:54]

Ms. Bredehoff: While we're still there, can you tell how much hair Amber has covering the right side of her face through this footage?

Ofc. Gatlin: No. It looks like from this camera view, most of the time, like, half of her head is blocked from the woman in front of her.

Ms. Bredehoff: Can you tell whether she's wearing any makeup?

Ofc. Gatlin: No.

[01:34:16]

[Video]

[01:34:30]

Ms. Bredehoff: Do you recall looking for any injuries in the faces of the three women?

Ofc. Gatlin: No.

Ms. Bredehoff: Now, Ofc. Gatlin, do you recall seeing two dogs in the house?

Ofc. Gatlin: Yes.

Ms. Bredehoff: They were running around pretty freely?

Ofc. Gatlin: Yes.

Ms. Bredehoff: And when you say that, would you be able to see it in here today, say that the person in these three photos defendants 7, 8, and 9 is the same person that was sitting on that sofa in the back, are you able to draw that connection?

Ofc. Gatlin: No, I don't recall.

Ms. Bredehoff: Do you disagree with my description of what's in this picture?

Ofc. Gatlin: No, I was stating that I didn't observe that when I was inside the apartment.

Ms. Bredehoff: Are you able to testify whether Amber Heard was the victim of domestic violence by Mr. Depp on May 21, 2016?

Ofc. Gatlin: Based on our investigation, it appeared as if she was not.

Ms. Bredehoff: Your investigation of what?

Ofc. Gatlin: Based on her refusing to give any statement on what had occurred. And at the time, we did not observe any visible or verifiable injuries to her.

Ms. Bredehoff: Anything else?

Ofc. Gatlin: Not that I can recall.

Ms. Bredehoff: All right. So did you interview any of the three other individuals in the apartment?

Ofc. Gatlin: No.

Ms. Bredehoff: Did you ask any of the individuals to give you a statement about what transpired?

Ofc. Gatlin: I believe the female that was sitting in the middle of the three told us that everything was fine and that the other officers had already conducted an investigation on the incident prior to our arrival.

Ms. Bredehoff: Did you ask that individual to give you a statement?

Ofc. Gatlin: Outside of that, no.

Ms. Bredehoff: Did you take that individual aside and try to interview her without the others present?

Ofc. Gatlin: No.

Ms. Bredehoff: Why not?

Ofc. Gatlin: As I just stated, everybody there had told us that the officers who had responded a couple hours before us had conducted the investigation and our call is still stemming from that incident. And there have been no change in the circumstance since then.

Ms. Bredehoff: Do you know whether Ofc. Saenz and Ofc. Hadden took any of the individuals aside and interviewed them?

Ofc. Gatlin: No.

Ms. Bredehoff: Did you at any point ask Amber Heard to come forward and examine her in the light to see if she had any injuries?

Ofc. Gatlin: No.

Ms. Bredehoff: Did you take a flashlight just to see if she had any visible injuries to her face or her body?

Ofc. Gatlin: No.

Ms. Bredehoff: Did you ask Amber Heard if she had any injuries?

Ofc. Gatlin: No.

Ms. Bredehoff: I'm asking whether you're in a position as a police officer to testify under oath that Johnny Depp did not commit any abuse of Amber Heard on May 21, 2016?

Ofc. Gatlin: I don't believe I'm in the position to testify whether he did or did not because I was not there in the incident potentially occurred.

Ms. Bredehoff: Okay. And you didn't conduct your own independent investigation, correct?

Ofc. Gatlin: Outside of the female telling us that everything was fine and the male answered the door, and told us that the other officers had already come and talked to everybody, and she told us they checked the both, two apartments. So I felt at that time sufficient that as I stated, there's no change in the circumstance from the previous call. So we did not go further into investigation.

Ms. Bredehoff: And that's the extent of your investigation, correct?

Ofc. Gatlin: Correct.

Ms. Bredehoff: Did you do that that night on May 21, 2016? Did you do anything other than what we have looked at on the video camera in connection with investigating whether Johnny Depp committed domestic violence of Amber Heard on May 21, 2016?

Ofc. Gatlin: No.

Ms. Bredehoff: Do you know whether Johnny Depp committed domestic violence of Amber Heard on May 21, 2016?

Ofc. Gatlin: No.

Judge Azcarate: Sorry. Your next witness.

Ms. Lecaroz: Alejandro Romero.

Judge Azcarate: Alejandro Romero.

Ms. Lecaroz: And if I might, Your Honor, this is another one that begins with questioning by counsel for Ms. Heard and later on switches to questioning by counsel for Mr. Depp.

Judge Azcarate: Okay, thank you.

Ms. Bredehoff: Mr. Romero, will you please state your name and address for the record.

Mr. Romero: Sorry. My name is Alejandro Romero. I go by Alex.

Ms. Bredehoff: What is your current occupation?

Mr. Romero: I work on the front desk of the Eastern Columbia Building.

Ms. Bredehoff: And is that for the Action Property Management company?

Mr. Romero: That's correct.

Ms. Bredehoff: How long have you been employed at the Eastern Columbia Building?

Mr. Romero: Approximately 13 years.

Ms. Bredehoff: And could you please describe what kind of work you do for the Eastern Columbia Building?

Mr. Romero: Most of it is just access control and I deal with a lot of residents regarding their packages and food deliveries.

Ms. Bredehoff: Okay. And have you done that pretty much the whole 10 years?

Mr. Romero: That's correct.

Ms. Bredehoff: I'm going to take you back to 2015 and 2016 for a moment. How many people would you say would go through the building on any particular day in that timeframe? I'm talking about tenants and visitors.

Mr. Romero: I cannot say a number because there's 147 units in the building and they have visitors, guests, friends. Actually, we used to send delivery people up. We don't send them anymore because of the COVID, but I cannot tell you a number. There's thousands of people probably.

Ms. Bredehoff: Have you ever met Johnny Depp?

Mr. Romero: I saw him a couple of times.

Ms. Bredehoff: Do you remember what Mr. Depp was wearing on any of those occasions?

Mr. Romero: Nope.

Ms. Bredehoff: Do you remember what jewelry he's having?

Mr. Romero: Nope.

Ms. Bredehoff: Do you remember what headgear he was wearing? If he was wearing a scarf or a hat?

Mr. Romero: No.

Ms. Bredehoff: Do you remember whether Mr. Depp was wearing any makeup or eyeliner [crosstalk 01:42:24.969]

Mr. Romero: Nope, I don't remember. No.

Ms. Bredehoff: You couldn't tell me one way or other, right?

Mr. Romero: No.

Ms. Bredehoff: Do you know whether Mr. Depp had ever been physically violent with Amber Heard? And by this I mean, hitting, punching, throwing objects at her, kicking her, headbutting her. Do you know one way or the other whether Mr. Depp ever did that to Ms. Heard?

Mr. Romero: No.

Ms. Bredehoff: Did you ever see Mr. Depp slam things around or be angry?

Mr. Romero: No, I have never seen him like that.

Ms. Bredehoff: I'm gonna ask you some questions now about Amber Heard. When did you first meet Amber Heard?

Mr. Romero: I believe she was passing on the lobby. I met her at the front desk. I got to interact more with her sister, Whitney. I believe that's her name and her good friend, Raquel, Rocky. But Amber, I only see her like once in a while when sometimes she used to get packages.

Ms. Bredehoff: Do you recall whether Ms. Heard became a resident sometime around March 2015?

Mr. Romero: I don't remember.

Ms. Bredehoff: Could you tell me one way or the other?

Mr. Romero: I just can't remember it. Like I said, it's been so long and I just don't remember. And like, I know you guys sent me the papers to review. And I'm gonna be honest, I didn't wanna review them because it's been so long. It's like, I just don't wanna deal with this anymore. Yes, I went through that with the statement and it's everything that is written there, that's what I said. That was correct. It was accurate. That's why I signed it.

Ms. Bredehoff: So during the time between 2015 and 2016, how many times would you say total that you interacted with Amber Heard?

Mr. Romero: For a whole year, I can't give you a number because it could be like, probably I'll see her... Probably, I saw Amber for three times in one day. Probably I'll see her like, five times and probably I will never see her for a whole week. So I don't have like, there's never been a routine.

Ms. Bredehoff: Okay. How would you describe Amber Heard's interactions with you? Were they friendly? Did she smile at you? Would she talk with you?

Mr. Romero: She was really friendly. She would always smile, but she... We never had like interaction as really close relationship like I do with some of the other residents. She never told me anything about her problems. She never stopped by and talk about her personal life. She never did that.

Ms. Bredehoff: They're asking you about a date that you recall seeing Amber Heard on May 25th, 2016. Do you see that?

Mr. Romero: Yes, I do.

Ms. Bredehoff: And you said, "Probably I just can't remember the days, I've got a really bad memory for dates." Did you see that?

Mr. Romero: Yup.

Ms. Bredehoff: So, Mr. Romero, would you at any time be able to remember what type of clothing Amber Heard was wearing from one of her event?

Mr. Romero: Nope, I don't remember.

Ms. Bredehoff: Would you remember on any daily basis what type of hairstyle she was wearing?

Mr. Romero: Nope.

Ms. Bredehoff: Would you remember on any type of basis what type of bag Amber Heard was carrying?

Mr. Romero: No.

Ms. Bredehoff: Would you be able to say whether Amber Heard was dressed up or casual on any given day?

Mr. Romero: No.

Ms. Bredehoff: Would you be able to say whether she wears what type of makeup Amber Heard was wearing on any given day?

Mr. Romero: No.

Ms. Bredehoff: Would you be able to say for example, whether Amber Heard had on concealer or foundation on any given day?

Mr. Romero: No.

Ms. Bredehoff: Would you be able to say whether Amber Heard had on blush or powder on any given day?

Mr. Romero: No.

Ms. Bredehoff: Would you be able to say whether Amber Heard had a mascara or eyeliner on any given day?

Mr. Romero: No.

Ms. Bredehoff: How about eyebrow pencil or lip pencil?

Mr. Romero: No.

Ms. Bredehoff: Do you have any memories of Amber Heard wearing a particular type of makeup or the type of outfit?

Mr. Romero: No.

Ms. Bredehoff: If you were asked to describe any characteristics of Amber Heard from two days earlier without knowing you were going to be asked, would you be able to testify to any of those? What she was wearing, what her makeup was, what her hairstyle was?

Mr. Romero: No, I probably won't remember.

Ms. Bredehoff: When is the first time that you recall anyone saying anything to you about the police being called at the EC Building because of the domestic dispute between Mr. Depp and Amber Heard?

Mr. Romero: Well, to answer your question, whatever happened, it happened on a Saturday. I don't work Saturday. When I got there on Monday, they asked me, "Oh, you heard what happened?" And said, "No. What happened?" So that's how I find out, then I went to the cameras to see what was going on and as soon as I saw Johnny Depp on the camera on the elevator just walking back and forth on the camera in the elevator, and I say, "Okay, I know that was him." And that's all I knew. But I was never... I was not there on that Saturday when that happened. I believe that whatever that happened they said it happened and when they called the police, I believe it was on a Saturday and I was not there.

Ms. Bredehoff: Okay. Do you recall who told you that on that Monday following Saturday?

Mr. Romero: Okay. That as a matter of fact, I think it was one of the residents that they approached me and they said there was a lot of noise because the person was working out on the gym that is next to the penthouse. They heard a punching noise and that's it. And that's why I checked the camera and said... And when I looked at the cameras and I saw Johnny like I said was just walking back and forth in the elevator, and I said like, "Okay, all right. Okay, I'll try to figure it out." And I didn't say anything more. I turn off the camera and that's it.

Ms. Bredehoff: So the first part of that, somebody was working out and heard noise?

Mr. Romero: Someone was working out on the gym and heard the noise. Hear some a lot of noise on the hallway because it's really rare to hear anything because most of the time, the penthouse level is really quiet.

Ms. Bredehoff: Okay. Do you remember who the person was in the gym that heard a lot of noise in the penthouse that night?

Mr. Romero: That's correct. I do remember the person.

Ms. Bredehoff: Who is it?

Mr. Romero: I remember the person. She'd been a resident of the building for a long time. I just don't remember her name.

Ms. Bredehoff: And where is the gym in comparison to the penthouse that's owned by Mr. Depp?

Mr. Romero: Like I said, Johnny Depp owns all the penthouse on the [inaudible 01:50:39.776] The gym of the Eastern Columbia Building is just in front of one of the penthouses. You actually could see it through the window.

Ms. Bredehoff: You can see the gym through a window of the penthouse and you can see the penthouse through a window of the gym?

Mr. Romero: You can see the gym through one of the windows to the penthouse and it has a patio that leads to the gym. Penthouse patio leads to the gym.

Ms. Bredehoff: Okay. And just if you think of her name while you're, you know, even if we're asking another question, please let me know. This tenant, this is a resident there, right? Who saw this.

Mr. Romero: Yeah. I believe her name is Shanna [SP].

Ms. Bredehoff: And so she told you she heard a lot of noise.

Mr. Romero: That's correct.

Ms. Bredehoff: Did she describe anything? Voices, any objects, anything like that?

Mr. Romero: No. She just said there was a noise, just noise and that she was just so surprised because like I said, it's always really quiet.

Ms. Bredehoff: Okay. And so she wanted to know what happened. And so you went to the video cameras to look at the video. How did you know when to look for them?

Mr. Romero: Because she got the time. She got the time that she was working out. That's why I figured out to track the time on the camera and looked. And then when I saw, as soon as I saw it like I said, Johnny Depp, walking back and forth of the elevator, I turned off the camera and I figured out, "Okay, this is what happened." I figured out, put one and two together. I thought, "Okay."

Ms. Bredehoff: When you said you figured out what happened after you saw Johnny Depp in the elevator, what did you figure out had happened?

Mr. Romero: I figured out that's why they call the cops, the police.

Ms. Bredehoff: Because why?

Mr. Romero: Because of the noise that was on the penthouse level.

Ms. Bredehoff: Mr. Romero, I'm going to ask you to look at... This is a video clip marked as Romero Exhibit Number 8. And it shows the date and timestamp near the bottom. Do you recognize this as the elevator at ECB building?

Mr. Romero: That's correct.

Ms. Bredehoff: Mr. Romero, you're nodding. Is this the video that you remember looking at after Shanna told you that she heard the noise that night?

Mr. Romero: That's correct.

Ms. Bredehoff: And that's Mr. Depp?

Mr. Romero: Correct.

Ms. Bredehoff: All right. Do you recognize the other two men in the elevator?

Mr. Romero: I recognize the guy in front of the elevator button. That's his personal bodyguard. The other guy, I've seen him before, but I never interact with him. If I did, I don't remember.

Ms. Bredehoff: And you said he looked agitated.

Mr. Romero: Yeah. He looks agitated like, he was walking back and forth. He took his jacket. His body language was different than before. Most of times he's really calm. He's just like really happy person. Like, this is the first time I saw him like that.

Ms. Bredehoff: And then you go to the next... So then you say Wednesday, May 25th. At approximately 10:30, Ms. Heard walked into the lobby accompanied by Ms. Raquel Pennington. That's the person you called Rocky earlier. Do you remember her?

Mr. Romero: Yes, that's correct.

Ms. Bredehoff: Okay. And you said that Ms. Heard approached you to ask you for the key to her unit which you gave. And you said we did not discuss anything else at that time.

Mr. Romero: Correct.

Ms. Bredehoff: Ms. Heard stood approximately 3 feet away from you. "I did not notice any bruises, cuts, swelling, red marks, or any other injuries of any kind on Ms. Heard's face." Do you see that?

Mr. Romero: Correct.

Ms. Bredehoff: Okay. But you weren't looking for bruises, cuts, swelling, red marks, or any other injuries on Ms. Heard's face that night, were you?

Mr. Romero: I was not looking for any marks, or bruises, or anything. But something like that will be really noticeable. But I guess, you know, I wasn't looking. I was more focusing in what my job duties was like, getting the key and also, I give her the key, and they were talking about... I told her, "You know what your dog..." I was talking with Raquel because her dog got out of her unit and that was one of my concerns. I would tell, "You know what? I saw your dog was outside. They didn't want me to get too close to it. So you go there." You know, on the penthouse area, that dog will be fine because it's not like I said, it's always really quiet and Mr. Depp owns everything up there. So they'll be fine. So that was one of my concerns. That was my job and I was just taking care of that. I was not trying to say, "Oh, let me see your face." No.

Ms. Bredehoff: So, and that's where I'm gonna follow up.

Mr. Romero: No.

Ms. Bredehoff: Do you remember what Ms. Heard was wearing that night?

Mr. Romero: No.

Ms. Bredehoff: Do you remember whether she was dressed up?

Mr. Romero: No.

Ms. Bredehoff: Do you remember where she was coming from that she was coming home at 10:30 at night with Ms. Pennington?

Mr. Romero: No, I don't remember. They didn't mention to me. She was actually, she was on the phone. She was with Raquel in front of me. We were talking about it and then she left to the lobby when she was still on the phone. I was focusing more on Raquel because I was telling about her dog.

Ms. Bredehoff: Okay. Do you remember what hairstyle Ms. Heard had that night?

Mr. Romero: No.

Ms. Bredehoff: Do you know what type of makeup Amber Heard was wearing that night?

Mr. Romero: No.

Ms. Bredehoff: Can you tell me whether she was wearing concealer or foundation?

Mr. Romero: No.

Ms. Bredehoff: Could you tell me whether she was wearing blush?

Mr. Romero: No.

Ms. Bredehoff: Could you tell me whether she was wearing any type of...any kind of eye makeup?

Mr. Romero: No. So, who wrote the sentence, "I did not notice any bruises, cuts, swelling, red marks, or any other injuries of any kind in Ms. Heard's face."

Mr. Romero: I'm pretty sure if I would have seen something like that, I would have said something.

Ms. Bredehoff: Mr. Romero...

Mr. Romero: I didn't saw any marks or bruises on her face. I just don't recall. I don't recall anything. She was just standing in front of me.

Ms. Bredehoff: I'm asking specifically. "I did not notice any bruises cuts, swelling, red marks, or any other injuries of any kind to Ms. Heard's face." Who wrote that?

Mr. Romero: That's what I said. I didn't see any marks or bruises on her face. That's what I said because they asked. They asked me if I remember seeing anything. I said, "I just don't recall seeing any marks or bruises because she was just sitting in front of me." I just don't remember seeing anything. I just don't remember. It would have been so obvious like, someone had like a black eye, I would have like, "Whoa," you know. I would have seen that and I would have remembered it. It's something that you would see, you know, like, it's so noticeable like, you will remember. But when I was there talking to her, she was like 3 feet away from me, she was right in front of me, I just don't remember seeing any marks, bruises, or anything.

Ms. Bredehoff: But you don't know whether she was wearing makeup to cover it, do you?

Mr. Romero: No, I don't know. No. She was wearing any makeup to try to cover it. Probably, you know, probably it will cover any bruise, but you cannot cover the swelling.

Ms. Bredehoff: Were you looking for swelling?

Mr. Romero: No. Like I said, I was not looking for anything.

Ms. Bredehoff: In fact you were spending more time talking to Rocky about her dog, were you not?

Mr. Romero: That's correct, but I gotta have it when I'm talking to someone, I look into their eyes. And when I was talking to Amber and Rocky, I always look into their eyes. And I will probably would notice like, any swelling or bruise like I said, I would probably would notice.

Ms. Bredehoff: Is it fair to say, Mr. Romero, that you can't say that Amber Heard had injuries or did not have injuries that day on the 25th?

Mr. Romero: I don't remember. Like I said, I would have probably remember the swollen, but I didn't see anything. I just don't remember.

Ms. Bredehoff: And you don't remember seeing anything, right? But do you remember even looking?

Mr. Romero: I remember, I remember. Okay, I'm really sorry, but I remember... I got to tell the whole story how they got there. Before they got in, they went and get the keys, they come down, they say, "Somebody try to get into my unit. There's trash on my door." And say... I'm like, "Oh, I'm really sorry." But who will think it's gonna get into the unit because they saw some scratches on the door like, what? Four inches above the door because the dog was scratching the door was

trying to get in. And they thought about someone's trying to break into their unit. I said... On my head, I was saying, "Do you really think someone's trying to get into your unit? There's scratches like, 4 inches above the floor on your door. That was the dog trying to get into the unit." They were so afraid. "Oh, someone's trying to get into my unit." I was like, "Oh, come on, really?" And I actually went. They asked me to go inside the unit just to check room by room to make sure that no one was there. So I did that. It's part of my job to make sure they're safe, but I like, really, I didn't understand why they want me to do that. Like, "Oh, I don't know." I was just so stressed out because of this. I just don't wanna deal with this anymore. I'm tired. I don't wanna deal with this court case. Everybody got problems and I don't wanna deal with this no more. I don't wanna put any more words.

Ms. Bredehoff: The interaction you just testified about is Amber Heard and Rocky Pennington talking about the dog and going up, and checking out the penthouse. None of that was on video footage, correct?

Mr. Romero: That's correct. We don't have cameras in the videos. Sorry. We don't have cameras on the hallways. We don't have cameras on the hallway.

Ms. Bredehoff: I'm gonna show you what has been marked as Romero Exhibit Number 1. It's a deposition that was taken of you on July 19, 2016. Now, that's approximately two months after the May, 21 2016 incident and do you recall giving that deposition?

Mr. Romero: 2016. Probably I did. I just don't remember.

Ms. Bredehoff: Okay. I'm going to take you to page 35. I've got a little bit more. When you were asked... This is the same incident that you're talking about now. Okay? And it's talking about... Okay. You spoke with Amber at the front desk, later saw her at the lobby, later went upstairs with her. It says the question at line 6, I just want to go back for a second here. You said several times in answering to my questions that you didn't recall seeing any marks on Amber's face. When you say you didn't recall seeing any of those marks, any marks, did you mean that you didn't see any marks on her face? And your answer then was, "I say that because when I saw Amber, I was not looking to see anything on her face. I was not looking to see anything." Do you recall giving that testimony under oath back at that time two months after the incident?

Mr. Romero: Yes. I remember because like I said, I always make eye contact with someone I'm talking to. But I'm not looking to find something like, "Oh, your makeup is wrong. You haven't have changed

your eyebrows or your eyelashes are not even," or... I'm not looking for anything. I'm just looking at their eyes and I'm not looking for anything else. But if I see something, I will probably remember.

Ms. Bredehoff: If you saw something, right?

Mr. Romero: Yeah, I would have probably would see. Like, if she had a swollen like, if she was wearing makeup, I probably would [inaudible 02:04:34] and I'll probably will remember that. But I was not looking for anything. I was like, "Oh," you know.

Ms. Bredehoff: How swollen was Amber on the 25th of May? How swollen was her cheeks?

Mr. Romero: According to the pictures I've been seeing right now that you're showing me, it was pretty swollen. I probably will remember that.

Ms. Bredehoff: How many days later did you see her from that swelling?

Mr. Romero: It was on a Wednesday. That was from Saturday to Wednesday, right?

Ms. Bredehoff: Right. How many days... Would it be fair to say that you cannot testify by one way or the other whether Amber Heard was domestically abused by Johnny Depp on May 21, 2016?

Mr. Romero: I cannot say that. I was not agreeing to testify against anyone of domestic violence because I was not there. I didn't see anything. I didn't hear anything. I was not there. I was never there. I was probably hundreds of miles away and I got no idea what happened that day.

Ms. Bredehoff: And do you remember that there was pictures of wine, a glass of wine and bottle of wine, wine stains on the floor outside of the...in the hallway of the penthouse from May 21st, 2016?

Mr. Romero: I remember seeing a mark. I'm not gonna say it was wine.

Ms. Bredehoff: All right. Well...

Mr. Romero: I'm not an expert.

Ms. Lecaroz: Ladies and gentlemen, the next portion of this deposition contains questions asked by counsel for Mr. Depp.

Mr. Presiado: ...today, when you saw her at the front desk on March 25th, you didn't see any bruising?

Mr. Romero: Correct.

Mr. Presiado: And you didn't see a [inaudible 02:06:32]

Mr. Romero: That's correct. I didn't see any marks or bruises.

Mr. Presiado: You didn't see any swelling either, did you, Mr. Romero?

Mr. Romero: That's correct. No swelling at all.

Mr. Presiado: And she was only 3 or 4 feet away from you, correct?

Mr. Romero: Correct.

Mr. Presiado: And you were looking right into her face squarely, correct?

Mr. Romero: Correct.

Mr. Presiado: And the lighting was good at the front desk, correct?

Ms. Bredehoff: Objection.

Mr. Romero: Correct.

Mr. Presiado: It was so good that had she had any bruises, swelling, or marks on her face, you would have noticed that, correct?

Mr. Romero: That's correct.

Mr. Presiado: And then later that same day... And you've testified to this already today. Later that same day, you went up the elevator with Ms. Heard and Ms. Pennington in connection with their request for you to check the penthouse, correct?

Mr. Romero: That's correct.

Mr. Presiado: And during that entire period of time taking them up to the penthouse, walking through the penthouse, and then finally, you leaving and going back to your desk, you did not... You looked at Ms. Heard during that time period, correct?

Mr. Romero: That's correct.

Mr. Presiado: And you looked her in the face, squarely in the face, correct?

Mr. Romero: Correct.

Mr. Presiado: And you didn't notice any swelling, correct?

Mr. Romero: Correct.

Mr. Presiado: I'm sorry.

Mr. Romero: Correct, I didn't see anything.

Mr. Presiado: Did you see any swelling?

Ms. Bredehoff: Objection.

Mr. Romero: No.

Mr. Presiado: Did you see any bruises?

Mr. Romero: No.

Mr. Presiado: Did you see any marks on her of any kind?

Mr. Romero: No marks at all.

Mr. Presiado: And again just to repeat, previously when you were [inaudible 02:08:19], did you see swelling on her face?

Mr. Romero: No.

Mr. Presiado: Did you see any swelling on her face?

Mr. Romero: No.

Mr. Presiado: Did you see any marks of any kind on her face?

Mr. Romero: No marks at all.

Mr. Presiado: And how was the light down when you were at the reception and you were looking at her, and didn't see any of this? How was the lighting?

Mr. Romero: The lighting is actually pretty good. It's not dark at all.

Mr. Presiado: And how far? How far were you?

Mr. Romero: She was 3 feet apart. She's 3 to four 4 apart.

Mr. Presiado: Were you looking her square in the face?

Mr. Romero: Correct.

Mr. Presiado: Okay. And when you were up in the penthouse, and when you were looking her in the face, how far apart were you from her then?

Mr. Romero: We actually were pretty close to each other. She was probably next, just next to me. She was telling me like, going to this room. So I need to pass right in front of her.

Mr. Presiado: And do you recall seeing any bruises swelling, redness, or any marks on Ms. Heard's face on May 24th, 2016?

Mr. Romero: I didn't see anything.

Ms. Lecaroz: Ladies and gentlemen, at this point, the remainder of this deposition of this witness contains questions by counsel for Ms. Heard.

Ms. Bredehoff: I'm gonna talk a little bit about the video clips that Mr. Depp's attorney showed you. I'm going to ask you first of all, Mr. Presiado showed you a number of video clips from May 24th. Do you recall that?

Mr. Romero: May 24th?

Ms. Bredehoff: Yes.

Mr. Romero: Yup, that's Tuesday.

Ms. Bredehoff: But in fact you don't recall seeing Amber Heard on May 24th, correct?

Mr. Romero: I don't remember. I don't even remember what I got for breakfast.

Ms. Bredehoff: Okay. Well, let's pull up Exhibit Number 1. Let's stay on page 17. That's a good place and this is your deposition from July 19, 2016. Did you recall that?

Mr. Romero: 19? Yeah.

Ms. Bredehoff: Okay, and that's...

Mr. Romero: 7:30 in the morning.

Ms. Bredehoff: Okay. And it said here... So, Saturday was the 21st. Did you work that day? "No." Did you work Sunday, May 22nd? "No." Did you work May 23rd? "Yes." On May 23rd while you were working, did you see Amber at any time? I don't recall seeing her. Question, did you work on Tuesday, May 24th? "Yes, I did." And on Tuesday, May 24th, at any time, did you see Amber? "I don't recall seeing her." Do you remember that being your testimony two months after the event?

Mr. Romero: Yeah. I just don't recall. I just don't remember.

Ms. Bredehoff: Okay. And then while we're here... Now, Mr. Presiado had you go through a number of video clips and ask you a bunch of questions about whether you saw swelling, whether you saw red marks, whether you saw all kinds of other things. But in fact, I'm going to ask

you and tell me if you need me to bring up the videos, and replay them. Can you tell me what type of makeup Amber Heard was wearing in any of those videos?

Mr. Romero: I can't tell you. I really don't know if she was wearing any lipstick. I don't know.

Ms. Bredehoff: Can you tell me whether Amber Heard was wearing concealer in any of those videos?

Mr. Romero: No.

Ms. Bredehoff: Can you tell me whether Amber Heard was wearing any foundation in any of those videos?

Mr. Romero: No, I can't tell you.

Ms. Bredehoff: Can you tell me whether Amber Heard was wearing any blush in any of those videos?

Mr. Romero: No.

Ms. Bredehoff: Can you tell me whether Amber Heard was wearing any powder in any of those videos?

Mr. Romero: No, no. But she looks really pale.

Ms. Bredehoff: Well, do you know what shade of concealer, or foundation, or powder Ms. Heard uses or used at that time?

Mr. Romero: No.

Ms. Bredehoff: Okay. So you don't know whether Ms. Heard was wearing makeup in every one of those video clips, correct?

Mr. Romero: Correct.

Ms. Bredehoff: I will try to move along. So, the incident was May 21st, 2016. You saw her the night of May 25th, correct?

Mr. Romero: Correct, correct.

Ms. Bredehoff: You said you saw Amber Heard hundreds of times while she was there. Did you ever treat you well and was she friendly to you in each of these hundreds of times?

Mr. Romero: Yeah, yeah. I'm not gonna say no because she was really always nice. She was really nice.

Ms. Bredehoff: All right, this is my last question. You testified in response to Mr. Presiado's questions that you testified truthfully in all of these occasions. Did you testify truthfully to everything that you testified in response to my questions today?

Mr. Romero: That's correct. I did.

Ms. Bredehoff: All right.

Judge Azcarate: Okay. Ladies and gentlemen, I think it's a good time. All right. It's a good time to break for lunch. We'll just break a little early. So, just don't talk to anybody and don't do any outside research. And we'll see you at 2:00. Okay? Thank you. All right. That was the first. I'm sorry.

Ms. Bredehoff: I will say, Your Honor, that is the most bizarre episode.

Judge Azcarate: Okay, all right. I've just never seen that before. I've seen a lot of things, but I've just never seen that.

Ms. Bredehoff: You started driving that.

Judge Azcarate: Yeah, I did it. All right, so we will come back at 2. Is there anything preliminary before we get to the next deposition?

Ms. Bredehoff: We'll work through them.

Judge Azcarate: You'll work through them and then if I come back at 2, we should be able to take care of it pretty quickly?

Ms. Bredehoff: Yes, Your Honor.

Judge Azcarate: Okay. All right, great. We'll come back at 2. Thank you. Are we ready for the jury? Okay.

Ms. Lecaroz: We are, Your Honor. Thank you.

Judge Azcarate: All right. Thank you for your patience, ladies and gentlemen. All right, your next witness.

Ms. Lecaroz: Plaintiff calls Christian Carino, Your Honor.

Judge Azcarate: Christian Carino.

Ms. Lecaroz: And as with a number of the other depositions, this one will start with questioning by Ms. Heard's counsel and at some point switch over to questioning by counsel for Mr. Depp.

Judge Azcarate: All right. And how do you spell the last name just for me?

Ms. Lecaroz: C-A-R-I-N-O.

Judge Azcarate: Thank you.

Ms. Bredehoff: Name and address for the record. And you may use your business address that you've done work on.

Mr. Carino: Christian Carino, and the work address is 2000 Avenue of the Stars in Century City.

Ms. Bredehoff: And that is in California?

Mr. Carino: Correct.

Ms. Bredehoff: And what is your current occupation?

Mr. Carino: I'm a talent agent.

Ms. Bredehoff: And could you give me just a very brief description of your educational background and work experience?

Mr. Carino: Sure. I have a BA from the University of Massachusetts and my work background is I've been at CAA for approximately 16 years. And before that, I had a 12-year run with two different advertising agencies in New York.

Ms. Bredehoff: And who were those advertising agencies in New York?

Mr. Carino: Ogilvy & Mather and McCann Erickson.

Ms. Bredehoff: Right. Now, you indicated that you were a talent agent. Can you please describe what that means?

Mr. Carino: I represent multiple clients, and brands, and transactions in the entertainment space.

Ms. Bredehoff: And when you say in the entertainment space, what are you including?

Mr. Carino: Just the different genres of entertainment. Everything from motion picture to television, to books, to licensing, to modeling, all the different areas that the agency operates in.

Ms. Bredehoff: As a talent agent representing multiple clients, what types of services do you perform for them and what is the agenda?

Mr. Carino: Okay. Yeah, I conduct business transactions on behalf of clients and brands in the entertainment space.

Ms. Bredehoff: And what does that mean?

Mr. Carino: It means I organize, pitch, transact in contractual agreements between talent and studios, talent and brands, entertainment platforms, and individuals, brands, and individuals.

Ms. Bredehoff: Do you represent any actors?

Mr. Carino: I do work with every different group of talent within the agency and for each person, it's different, the business that I personally oversee for them. So in some cases, I am negotiating contractual agreements for a music artist to go to Las Vegas. In some cases, I'm transacting an agreement for an artist to have a relationship with a brand. In some cases, it's an artist with a platform like Netflix. It spans the general platform capabilities that the agency has overall.

Ms. Bredehoff: Is one of the objectives of your representation to build the careers of the individuals you represent?

Mr. Carino: Yes.

Ms. Bredehoff: Did you have any conversations with Mr. Waldman in which you expressed any thoughts or opinions on how you believed any litigation was having an effect on Mr. Depp's reputation or career?

Mr. Carino: Yes.

Ms. Bredehoff: How many times?

Mr. Carino: One that I can recall.

Ms. Bredehoff: And when was that?

Mr. Carino: I have no idea. Years ago.

Ms. Bredehoff: If you express to Mr. Waldman that the sooner the litigation is over, the better for Mr. Depp, what were you thinking when you said that? Why did you think that?

Mr. Carino: I think anytime somebody is in litigation publicly, it is at a minimum of distraction to that person's career and in a lot of cases it negatively impacts that person because there's attention drawn to them that it is outside of what people want to know about that person.

Ms. Bredehoff: And what do you mean by it distracts in the career?

Mr. Carino: I mean, with somebody who is well known, people don't want to hear they're in a lawsuit with anybody about anything.

Ms. Bredehoff: Why not?

Mr. Carino: Because that's just not what they want to know or hear news about people.

Ms. Bredehoff: And why do you believe that?

Mr. Carino: Based on my experience in this world for the past 16 years.

Ms. Bredehoff: And when you say it negatively impacts, what do you mean by that?

Mr. Carino: People don't wanna hear that the people that they look up to are in litigation.

Ms. Bredehoff: Do you also believe that that impacts career decision by producers, directors, companies, your brands, things of that nature?

Mr. Carino: Yes.

Ms. Bredehoff: And in what way?

Mr. Carino: Because the general public doesn't wanna hear that people that they look up to are in litigation and when it... The more oxygen it takes up in the overall news or coverage of an individual, and the less focused it is on that person's career, the less interested studios, brands, the general public becomes in that person.

Ms. Bredehoff: And therefore, less opportunities?

Mr. Carino: Yes.

Ms. Bredehoff: When you express to Adam Waldman that your opinion that the sooner the litigation was over for Mr. Depp, the better, what did Mr. Waldman?

Mr. Carino: To be honest, I don't recall exactly what he said. But something like, we're gonna get this over with as fast as we can.

Ms. Bredehoff: Mr. Carino, I'm going to ask you to take a look at what has been marked as Carino Exhibit Number... We'll keep it labeled 4. Do you believe that the Mandel lawsuit posed a distraction to Mr. Depp's career?

Mr. Carino: I don't know.

Ms. Bredehoff: I'm going to show you what has been marked as Carino Deposition Exhibit Number 5. And as you can see here, it's an article, June 21st, 2017, The Hollywood Gossip. Do you recall that coming up during that timeframe that issue?

Mr. Carino: No.

Ms. Bredehoff: Have you read or heard of the "Rolling Stones"?

Mr. Carino: Yes.

Ms. Bredehoff: Have you read or heard of GQ?

Mr. Carino: Yes.

Ms. Bredehoff: Mr. Carino, I'm going to ask you to take a look at what has been marked as Carino Deposition Exhibit Number 2 and it's "Rolling Stone" publication on June 21, 2018. Do you see that?

Mr. Carino: Yes.

Ms. Bredehoff: Do you ever read this article?

Mr. Carino: Parts of it.

Ms. Bredehoff: Are you aware of whether this article in the "Rolling Stone," June 2018, that's reflected in Carino Exhibit Number 2 impacted in a negative way Mr. Depp's reputation or career?

Mr. Carino: Elaine, I don't think it's possible to ask anybody that question without having done research among the people who read a specific article. If you're asking my opinion about whether an article like this or this particular article in my opinion would have a positive or negative effect on somebody's, you know, career, I could potentially answer that. But as to definitively whether an article has or has not had an impact on somebody's career, nobody can answer that question without research specifically.

Ms. Bredehoff: Mr. Carino, I think we were just going to start looking at the Carino Exhibit Number 3. This is an article that was published in November of 2018. Do you recall reading this at some point?

Mr. Carino: What publication is that?

Ms. Bredehoff: This is GQ.

Mr. Carino: I probably read part of it, but I don't remember.

Ms. Bredehoff: Have you had any direct contact with Ed White or his company?

Mr. Carino: Yes.

Ms. Bredehoff: And what is the nature of your contact with Ed White and his company?

Mr. Carino: Payment on deals where Johnny was owed money. Bill collecting.

Ms. Bredehoff: When you say bill collecting, was it collecting on your behalf or was it trying to collect from studios or companies?

Mr. Carino: The latter.

Ms. Bredehoff: And so, what would your involvement be in those circumstances?

Mr. Carino: Ed on occasion reached out to me to ask about the timing of a payment that was owed to Johnny.

Ms. Bredehoff: All right. And were you able to answer those question?

Mr. Carino: I think in all cases, I just referred him to somebody who worked for me to find out what the payment schedule was.

Ms. Bredehoff: Other than these occasions where Ed White would reach out to you to ask timing and payment, did you have any other connection or communication with Ed White or his company in connection with Johnny Depp?

Mr. Carino: No.

Ms. Bredehoff: Were you familiar with Jake Bloom?

Mr. Carino: Yes.

Ms. Bredehoff: Do you know whether Mr. Bloom ever represented Mr. Depp?

Mr. Carino: Yes.

Ms. Bredehoff: And what was your understanding of the nature of that representation?

Mr. Carino: He was his lawyer.

Ms. Bredehoff: Did you ever talk to Jake Bloom?

Mr. Carino: Yes.

Ms. Bredehoff: And how many occasions did you speak with Jake Bloom relating to Mr. Depp?

Mr. Carino: I have no idea.

Ms. Bredehoff: Was it pretty frequently?

Mr. Carino: What does that mean?

Ms. Bredehoff: Well, is it more than 10?

Mr. Carino: Are you asking me if I had approximately 10 conversations with Jake over the duration of our relationship?

Ms. Bredehoff: Yes, I actually asked if you had more than 10. I wasn't asking you if it was exactly 10.

Mr. Carino: Okay. I mean, I'm guessing that it was probably less than 10 in total.

Ms. Bredehoff: Was Mr. Bloom still representing Mr. Depp when you started representing Mr. Depp?

Mr. Carino: I believe so, but I'm not sure. And when did you start representing Mr. Depp?

Ms. Bredehoff: I believe it was in late 2016.

Ms. Bredehoff: Mr. Carino, are you looking at something to be able to refresh your recollection?

Ms. Carino: I am.

Ms. Bredehoff: What do you have in front of you?

Mr. Carino: A note that I made to myself of the date of when Johnny was a client and I think I wrote down October 2016.

Ms. Bredehoff: Do you have a recollection of the context of your discussions with Mr. Bloom?

Mr. Carino: Yes. My recollection of the conversations I had with Jake were in regard to getting Johnny and Jake to meet, and work out whatever the issues were around their disagreement.

Ms. Bredehoff: So you were trying to broker if you will, a discussion between them to try to resolve their issues?

Mr. Carino: Correct.

Ms. Bredehoff: Were you successful in that?

Mr. Carino: I don't remember whether they ever got together and met about it to be honest.

Ms. Bredehoff: Now, I'm gonna show you what has been marked as Carino Deposition Exhibit Number 7 and this is a lawsuit that was filed on October 17, 2017. Were you aware of this litigation being filed by Mr. Depp on his behalf against Bloom Hergott, Diemer, etc.?

Mr. Carino: Yes.

Ms. Bredehoff: And were you involved in any way in this litigation?

Mr. Carino: No.

Ms. Bredehoff: Do you know one way or the other whether the filing of and the ongoing litigation associated with this lawsuit had any negative impact on Mr. Depp's reputation and career?

Mr. Carino: I said no, Elaine.

Ms. Bredehoff: Do you recall whether there was any publicity surrounding this litigation that's reflected in the complaint that's Carino number 7?

Mr. Carino: Are you asking me if I'm aware if the Jake Bloom litigation was made public?

Ms. Bredehoff: Yes.

Mr. Carino: Yes.

Ms. Bredehoff: And in addition to being made public, do you recall whether there was publicity surrounding the Jake Bloom litigation?

Mr. Carino: Yes.

Ms. Bredehoff: And do you recall whether there was publicity surrounding the Mandel litigation?

Mr. Carino: Yes.

Ms. Bredehoff: Mr. Carino, I'm gonna ask you what has been marked as deposition Exhibit Number 10 and in this particular one, we have... This is the article that was written in the Sun-Times that was the beginning if you will, of the UK lawsuit. Do you have a recollection of seeing that?

Mr. Carino: No.

Ms. Bredehoff: Did you ever read it?

Mr. Carino: I don't know. I'd have to... I don't know. I'm sure I've read at least part of it if it's the original document that caused the Sun legal issues.

Ms. Bredehoff: Now, the date on this one is April 27th, 2018. Do you see that on there?

Mr. Carino: Yup.

Ms. Bredehoff: Mr. Carino, I'm going to ask you what has been marked as Carino Deposition Exhibit Number 11 and it's dated June 13, 2018. It's hard to see that little stamp there, but it was filed on June 13, 2018. And it's Mr. Depp filing the News Group Newspapers Ltd., The Sun, and Dan Wootton. Were you aware that Mr. Depp brought this lawsuit in the UK against The Sun and Mr. Wootton?

Mr. Carino: Yeah.

Ms. Bredehoff: Mr. Carino, I'm going to ask you to take a look at what has been marked now as Carino Exhibit Number 12. This was published in the Washington Post on December 18, 2018. Were you aware of this article?

Mr. Carino: Yes. Yes.

Ms. Bredehoff: Mr. Carino, when I asked you whether you were aware one way or the other whether this lawsuit that's reflected in Exhibit Number 11 had a negative impact on Mr. Depp's reputation and career, you answered no. What did you mean by that?

Mr. Carino: I meant that there isn't a way for any individual to know whether the filing of a document had an impact on somebody's career, positive or negative without specific research conducted in exactly that case.

Ms. Bredehoff: The same as in the facts that because you haven't researched it that you don't know whether it impacted Mr. Depp's reputation or career, correct?

Mr. Carino: I believe I stated that unless someone had done research specifically about the filing of this document and its impact one way or the other, it's impossible to answer the question.

Ms. Bredehoff: I'm going to show you what has been marked as Carino number 14 and this is the lawsuit that Mr. Depp filed against Ms. Heard. Do you believe that the filing of this lawsuit reflected in Carino

Deposition Exhibit Number 14 and the attendant publicity has had a negative impact on the reputation and career of Mr. Depp?

Mr. Carino: No.

Ms. Bredehoff: And why not?

Mr. Carino: Because I've stated previously, it's not about the filing of a lawsuit. It's about the coverage. I mean, you're asking me what my opinion is of what Johnny's reputation is today. Is that what you're asking?

Ms. Bredehoff: Yes.

Mr. Carino: My opinion of what Johnny's reputation today is one of the finest actors of his generation.

Ms. Bredehoff: In your opinion, has Mr. Depp's reputation changed at any point from October 2016 to the present?

Mr. Carino: If you're asking me if what I defined as his reputation has changed in terms of his being viewed as one of the best actors of his generation, I would say no.

Ms. Bredehoff: So, just so I'm clear that I understand your answer. In your opinion, Mr. Depp's reputation is that he is one of the finest actors of his generation and that has been his reputation since you started representing him in October 2016, it still is today and it hasn't changed during that timeframe. Is that correct?

Mr. Carino: The view on his acting ability has not changed.

Ms. Bredehoff: Well, I'm taking your definition of reputation you said what they are known for. So I'm taking that specific definition and I'm asking, is there anything other than that Mr. Depp is one of the finest actors of his generation that he is known for that has changed between October 2016 and the present?

Mr. Carino: The only way I can answer that is as it relates to his professional capabilities. That has not changed.

Ms. Bredehoff: Is there something that has changed that doesn't relate to his professional capabilities?

Mr. Carino: I don't know how to answer that, Elaine

Ms. Bredehoff: Using your definition of reputation which is what a person is known for, is there any aspect of what Mr. Depp is known for that has changed between October 2016 and the present?

Mr. Carino: I've stated what I think his reputation is and I've stated that in my opinion, his professional reputation as it relates to the quality of his acting abilities has remained unchanged.

Ms. Bredehoff: Do you make any distinction between personal and professional reputation?

Mr. Carino: Yes.

Ms. Bredehoff: And what is that distinction?

Mr. Carino: The difference between what somebody does on-screen and off-screen.

Ms. Bredehoff: What is your opinion of what Mr. Depp was known for off-screen when you started representing him in October 2016?

Mr. Carino: I think what he was known for off-screen was a shroud of mystery of who he was because he was not visible to the public.

Ms. Bredehoff: And that was back in October 2016?

Mr. Carino: I don't have a specific date for that.

Ms. Bredehoff: All right. But when you started representing him, that was your sense?

Mr. Carino: Yes.

Ms. Bredehoff: Okay. Did that change over time?

Mr. Carino: Yes.

Ms. Bredehoff: And in what way did it change?

Mr. Carino: It changed with the exposure that came with the lawsuits.

Ms. Bredehoff: And the lawsuits that we're talking about are the ones that we've already taken a look at, Exhibit 4, 7, 8, 9, 11, and 15? No. I mean, 14?

Mr. Carino: I'm not talking about any one or two specifically in general.

Ms. Bredehoff: Do you believe that Mr. Depp is still a shroud of mystery not visible to the public?

Mr. Carino: No.

Ms. Bredehoff: And when did that change?

Mr. Carino: I don't know exactly when.

Ms. Bredehoff: Would you say it was cumulative over a period of time as a result of all of the litigation and the publicity ensuing?

Mr. Carino: Probably.

Ms. Bredehoff: Is there any one specific litigation that you believe most significantly impacted on Mr. Depp's personal reputation no longer being a shroud of mystery and not visible to the public?

Mr. Carino: My opinion is that Amber's accusations would have had the most dramatic impact on his off-screen reputation. I'm not talking about any one specific accusation.

Ms. Bredehoff: When you say Amber's accusations, what do you mean by that?

Mr. Carino: I mean, the things that she's accused Johnny of doing both in...that have been made public.

Ms. Bredehoff: Now, those accusations were made public in the divorce back in 2016, correct?

Mr. Carino: I don't know exactly how or when they were made public.

Ms. Bredehoff: Given that you believe Amber's accusation would have had the most dramatic impact on Mr. Depp's off-screen reputation, would Amber filing the divorce action and obtaining a domestic violence restraining order have had a dramatic impact on Mr. Depp's off-screen reputation?

Mr. Carino: I think the only way I can answer that is by saying I don't think filing for divorce would have any impact, whatsoever, and I'm actually not familiar with the lawsuit to get the restraining order. So I don't know exactly what's in there, but if that was based on claims or accusations of abuse, then that in my opinion would have a negative impact on Johnny's off-screen reputation.

Ms. Bredehoff: Mr. Carino, we were talking about Amber's accusations and your view that those would have the most dramatic impact on Mr. Depp's off-screen reputation. And you were talking about her accusations of domestic abuse and violence, correct?

Mr. Carino: Yes.

Ms. Bredehoff: Were you aware that the Dan Wootton article published in "The Sun" included specific accusations by Amber Heard of domestic violence and abuse by Mr. Depp?

Mr. Carino: "The Sun" case? Is that what you're asking about?

Ms. Bredehoff: Yeah.

Mr. Carino: Yes.

Ms. Bredehoff: Well, first the article itself that was in the paper, "Why is J.K. Rowling be 'genuinely happy' about employing Mr. Depp in wide theater?"

Mr. Carino: Yes.

Ms. Bredehoff: Okay. And you're aware that the litigation, the lawsuit including the particulars of the claim brought by Mr. Depp included the accusations by Amber Heard of domestic violence and abuse by Mr. Depp, correct?

Mr. Carino: Yes.

Ms. Bredehoff: Given that the Mandel lawsuit included accusations by Amber Heard of domestic violence by Mr. Depp against her, are you able to say how much of Mr. Depp's off-screen reputation was in that impacted by the Mandel lawsuit?

Mr. Carino: No.

Ms. Bredehoff: Now, you were aware that the op-ed by Dan Wootton and "The Sun" included accusations by Amber of domestic violence against Mr. Depp, correct?

Mr. Carino: Yes.

Ms. Bredehoff: Are you aware one way or the other how much Mr. Depp's off-screen reputation was impacted by the complaint that was filed in this case that contained Amber Heard's accusations of domestic violence and abuse by Mr. Depp?

Mr. Carino: No.

Ms. Bredehoff: Are you aware of how much Mr. Depp's off-screen reputation was impacted as a result of the op-ed in the Washington Post from Amber Heard?

Mr. Carino: No.

Ms. Bredehoff: Are you aware of how much Mr. Depp's off-screen reputation was impacted by the accusations included in the Waldman tweet on May 2020 of the op-ed?

Mr. Carino: No.

Ms. Bredehoff: Are you aware of any role or opportunity that Mr. Depp lost as a result of the op-ed by Dan Wootton and "The Sun"?

Mr. Carino: No.

Ms. Bredehoff: Are you aware of any role or... And when I'm saying opportunity, any kind of business opportunity, that Mr. Depp lost as a result of the particulars of claim that Mr. Depp filed?

Mr. Carino: No.

Ms. Bredehoff: Are you aware of any role or business opportunities that Mr. Depp lost as a result of the op-ed by Amber Heard in the Washington Post?

Mr. Carino: No.

Ms. Bredehoff: Are you aware of any roles or business opportunities that Mr. Depp lost as a result of the Waldman tweet on May 2020 relating to Amber's op-ed?

Mr. Carino: No.

Ms. Bredehoff: Is there any other goal or business opportunity that Mr. Depp has lost since you started representing him in October 2016? And I'm saying...

Mr. Carino: I would say his... I would say yes.

Ms. Bredehoff: What?

Mr. Carino: The Pirates, the next Pirates movie.

Ms. Bredehoff: Do you remember which one that was?

Mr. Carino: Six, seven. I'm not sure what the number is.

Ms. Bredehoff: It's 6. I think Pirates 6 is the one that he have to come out with. And what is your understanding of why Mr. Depp's lost Pirates 6?

Mr. Carino: My opinion is that it was related to the accusations that Amber has made.

Ms. Bredehoff: And what is your opinion based on?

Mr. Carino: Excuse me.

Ms. Bredehoff: What is your opinion based on?

Mr. Carino: Conversations with colleagues and studios, executives.

Ms. Bredehoff: I'm sorry. I didn't quite hear you.

Mr. Carino: Conversations with studios and other executives, both internal and external.

Ms. Bredehoff: When you say related to the accusations that were made by Amber Heard against Mr. Depp, are you talking about accusations of domestic violence and abuse by Mr. Depp?

Mr. Carino: Yes.

Ms. Bredehoff: Okay. How many conversations have you had with studio and other executives?

Mr. Carino: I have no idea.

Ms. Bredehoff: More than five? More than 10?

Mr. Carino: I don't know about more than 10. Probably between 5 and 10.

Ms. Bredehoff: Who do you recall speaking with at studios or other executives?

Mr. Carino: Jerry Bruckheimer. Probably mostly Jerry and then colleagues at CAA.

Ms. Bredehoff: When did you first have any conversations with Jerry Bruckheimer about Pirates 6, this movie?

Mr. Carino: I have no idea.

Ms. Bredehoff: Do you recall whether it was in 2016, 2017, 2018, 2019?

Mr. Carino: I don't.

Ms. Bredehoff: When did you have any conversations with colleagues at CAA?

Mr. Carino: It would have been whenever the decisions were being made about how to cast that movie. Honestly, I don't know what year that was.

Ms. Bredehoff: Do you recall who you spoke with CAA?

Mr. Carino: I spoke with Jack Whigham. I spoke with Bryan Lourd.

Ms. Bredehoff: What do you recall Jerry Bruckheimer telling you?

Mr. Carino: I don't recall the specific conversations, but the nature of it was that the studio was having difficulty employing him.

Ms. Bredehoff: And did Mr. Bruckheimer tell you why the studio was having difficulty employing Mr. Depp?

Mr. Carino: No, not specifically, but it was understood.

Ms. Bredehoff: Did you ask?

Mr. Carino: I didn't need to.

Ms. Bredehoff: Why did you think you didn't need to?

Mr. Carino: Because everyone was aware of what was garnering the attention of the studios and determining whether or not he could be employed.

Ms. Bredehoff: When you say everyone was aware, how do you know that?

Mr. Carino: I don't know. I just knew.

Ms. Bredehoff: Can you tell me who everyone is? Can you tell me who everyone is?

Mr. Carino: The people who would have been involved in making that decision.

Ms. Bredehoff: Well, if I'm understanding you correctly and please correct me if I'm wrong, the only person that Disney that you spoke with about Pirates and employing Mr. Depp was Jerry Bruckheimer. Correct?

Mr. Carino: Yes, correct.

Ms. Bredehoff: All right. And you spoke between 5 and 10 times with Mr. Bruckheimer and he did not say in any of those conversations, "The reason we're not employing Mr. Depp is because of Amber Heard's accusations of domestic violence or abuse by Mr. Depp," correct?

Mr. Carino: That's correct.

Ms. Bredehoff: Mr. Carino, when we went off for the break, we were talking about your discussion with Jerry Bruckheimer and other executives at CAA respecting Mr. Depp not being employed further at Disney and likely not in Pirates. And I think a question came up right before the break. And so I just wanna make sure that I have it clear. Did you talk with anyone other than Jerry Bruckheimer at Disney about Mr. Depp not being employed again at Disney or Pirates?

Mr. Carino: No.

Ms. Bredehoff: Okay. And was I correct in understanding you had somewhere between 5 and 10 conversations with Mr. Bruckheimer relating to this topic?

Mr. Carino: Probably less than that. I talk to Jerry regularly, but probably not that many on this topic.

Ms. Bredehoff: Okay. And was there anyone else at Disney that you spoke with at any point about Johnny Depp being considered for Pirates or not being employable by Disney?

Mr. Carino: No.

Ms. Bredehoff: Okay. And is that true to the present?

Mr. Carino: Yes.

Ms. Bredehoff: Okay. And the other discussions that you had, those were all with executives at CAA?

Mr. Carino: Yes.

Ms. Bredehoff: And that was Bryan Lourd and Jack Whigham, correct?

Mr. Carino: Yes.

Ms. Bredehoff: Anyone else?

Mr. Carino: Not that I can recall. No.

Ms. Bredehoff: Okay. And you have indicated that you believe that everybody, everyone was aware that the impact of Amber's allegations were at the heart of this. I just wanna make sure that we're clear since we were just talking about this before the break. Jerry Bruckheimer did not say specifically what it was that caused Disney to decide not to continue with Johnny Depp and Pirates 6 or in other matters, correct?

Mr. Carino: Correct.

Ms. Bredehoff: Well, and I'm trying to reach that it was understood. I'm trying to discover any facts that would have led you to believe it was understood. And if I'm understanding, I'll use the same word, Mr. Bruckheimer didn't tell you that, correct?

Mr. Carino: Again, it was understood. So I don't recall whether either of us ever said anything specific about why, but it is something within the industry that is understood.

Ms. Bredehoff: Can you tell me whether any other actors did not receive roles or were unemployable because of the Me Too movement allegations other than Mr. Depp?

Mr. Carino: Not that I work with directly. No.

Ms. Bredehoff: In any of your discussions with Mr. Bruckheimer, did you ask him what Mr. Depp could do to become employable by Disney again or to be able to get any part of any Pirates franchise going forward?

Mr. Carino: No.

Ms. Bredehoff: Why not?

Mr. Carino: Because in cases like this, there is nothing anybody can do. It is the directive of the studio and they have the sole right to make the judgment whether they can continue to employ somebody or not.

Ms. Bredehoff: And your understanding from your discussions with Mr. Bruckheimer is that Disney had made the judgment to decide that they could no longer employ Mr. Depp. Is that correct?

Mr. Carino: Yes, but not solely based on conversations with Mr. Bruckheimer. It was cumulative with the internal and external conversations.

Ms. Bredehoff: What did Mr. Lourd say that led you to believe that, that Disney had made the decision, the judgment that they did not were not able to employ Mr. Depp?

Mr. Carino: Just that the decision had been made.

Ms. Bredehoff: What did Mr. Whigham say about basically making the judgment of whether they would not be able to employ Mr. Depp?

Mr. Carino: The same. Same thing.

Ms. Bredehoff: Okay. Just like they made the decision?

Mr. Carino: Correct.

Ms. Bredehoff: Were you aware of any problems on the set with Mr. Depp during the filming of Pirates 5?

Mr. Carino: No.

Ms. Bredehoff: Are you aware of Mr. Depp engaging in alcohol and drug use being tardy any of those issues during the filming of Pirates 5?

Mr. Carino: I'm aware of him being tardy, but he's been tardy on everything his entire life.

Ms. Bredehoff: Were you aware of whether that was troublesome to Disney during the filming of Pirates 5?

Mr. Carino: I think it's troublesome to everybody, but everyone has learned how to produce a film dealing to deal with it.

Ms. Bredehoff: Working around Mr. Depp?

Mr. Carino: Yes.

Ms. Bredehoff: Do you know whether there was anyone on the set of Pirates 5 who wasn't willing to deal with it and was quite irritated about it?

Mr. Carino: No.

Ms. Bredehoff: Were you aware that the filming had to be shut down for a period of time after Mr. Depp injured his finger?

Mr. Carino: Yes.

Ms. Bredehoff: Were you aware of any disagreements between Mr. Depp and Disney, including Mr. Bailey and others who were on the project about artistic differences, in other words, for Mr. Depp thought something should be this way or something should be that way, and they didn't agree?

Mr. Carino: Yes.

Ms. Bredehoff: Okay. What is your understanding of that?

Mr. Carino: There was a difference of opinion on how the film was edited.

Ms. Bredehoff: And what is your understanding of what Mr. Depp thought it should be edited to?

Mr. Carino: I don't know how to describe the difference between the Disney edit and Johnny's preferred edit. I think Johnny told me about it, talked about a little bit.

Ms. Bredehoff: Do you know how well Pirates 5 did at the box office?

Mr. Carino: Not exactly.

Ms. Bredehoff: Do you know whether it was more successful or less successful than earlier Pirates franchise?

Mr. Carino: I think it was slightly less than. It wasn't the most successful installment of that franchise.

Ms. Bredehoff: Do you know whether Mr. Depp has a pay or play clause that would pay him even if he was not in the subsequent Pirates 6?

Mr. Carino: In 6?

Ms. Bredehoff: Yes.

Mr. Carino: I don't think he does.

Ms. Bredehoff: Have you or any anyone at CAA on behalf of Mr. Depp made any efforts with Disney to find any roles for Mr. Depp since he filmed Pirates 5?

Mr. Carino: My efforts were probably primarily around Houdini, which at one point was at film, but other people at CAA for sure did. Yes.

Ms. Bredehoff: And who were they?

Mr. Carino: I would start with Jack Whigham.

Ms. Bredehoff: We'll now play volume 2 of Mr. Carino's deposition at which...

Judge Azcarate: Okay. It might be time for afternoon.

Ms. Lecaroz: Sure.

Judge Azcarate: Why don't we just close it up to this?

Ms. Lecaroz: Absolutely, Your Honor.

Judge Azcarate: So, all right. Before we get to volume 2, let's go ahead and take a 15-minute break. Please do not talk to anybody about the case and don't do any outside research. Thank you. Okay. Let's get it's through. All right. You wanna continue with this witness then?

Ms. Lecaroz: Yes. Thank you, Your Honor. We'll now play volume 2 of Mr. Carino's deposition which is the questioning from counsel for Mr. Depp.

Judge Azcarate: Okay, thank you.

Mr. Presiado: You're aware that this litigation involves a dispute between Johnny Depp and Amber Heard, correct?

Mr. Carino: Correct.

Mr. Presiado: And you know both of those individuals, correct?

Mr. Carino: Correct.

Mr. Presiado: Who did you meet first?

Mr. Carino: Amber.

Mr. Presiado: When did you meet her?

Mr. Carino: I don't know exactly when, but probably within the first few years of being at CAA.

Mr. Presiado: Okay. So can we as an estimate say, 2005, 2006 timeframe?

Mr. Carino: Sure. I don't actually know, but sure.

Mr. Presiado: But it was pretty early on at your career in CAA?

Mr. Carino: Correct.

Mr. Presiado: And describe for me the events of your meeting her.

Mr. Carino: She was represented theatrically at the time by an agent named, Warren Zavala, who has since left CAA and he brought her down to my office because he wanted me to represent her with him, specifically in the commercial space.

Mr. Presiado: And what do you mean represent her in the commercial space?

Mr. Carino: Help identify business opportunities for her with brands.

Mr. Presiado: Okay. So not as an actor?

Mr. Carino: Correct.

Mr. Presiado: And did you take on that representation?

Mr. Carino: I did.

Mr. Presiado: And at some point in time you did consider her a friend in addition to you two working together. Is that right?

Mr. Carino: Yes.

Mr. Presiado: And in that regard, did you and her do anything social?

Mr. Carino: Yes.

Mr. Presiado: And can you describe for me generally what types of activities you two would do together as friends?

Mr. Carino: We would go to dinner, go to events together, hang out at each other's residences.

Mr. Presiado: And at some point in time, did you consider Mr. Depp a friend?

Mr. Carino: Yes.

Mr. Presiado: And how did that relationship evolve? And I'm just talking about you and Mr. Depp becoming friends.

Mr. Carino: I spent a fair amount of time with both of them together and at some point, started to spend time with him on my own as well.

Mr. Presiado: I see. And at some point in time, did Mr. Depp become a good a friend to you as Ms. Heard?

Mr. Carino: Yeah.

Mr. Presiado: I'm sorry. Let me re-ask that also. At some point in time, did you consider Mr. Depp a friend to the same degree you considered Ms. Heard a friend?

Mr. Carino: Yes.

Mr. Presiado: And at some point... Let me ask you. At some point in time, did you represent Mr. Depp professionally?

Mr. Carino: Yes.

Mr. Presiado: And can you explain to me how it came to you representing Mr. Depp professionally?

Mr. Carino: Johnny asked me to represent him.

Mr. Presiado: And when you began representing Mr. Depp, did you continue representing Ms. Heard?

Mr. Carino: Yes.

Mr. Presiado: And do you recall who Mr. Depp's agent was prior to you?

Mr. Carino: He was represented at another talent agency, UTA.

Mr. Presiado: Do you still work for Mr. Depp?

Mr. Carino: I do not.

Mr. Presiado: Can you recall when you stopped working for Mr. Depp?

Mr. Carino: Within the past two years.

Mr. Presiado: And can you describe the circumstances of you no longer working for Mr. Depp?

Mr. Carino: He left CAA to follow an agent who left CAA to become part of a founding group in a new management company.

Mr. Presiado: And who is that person?

Mr. Carino: Jack Whigham.

Mr. Presiado: Was Mr. Whigham ever affiliated with CAA?

Mr. Carino: Yes.

Mr. Presiado: Okay. And you say that when Jack Whigham departed CAA, Johnny went with him?

Mr. Carino: Yes.

Mr. Presiado: Okay. And when Mr. Depp left CAA, did you remain friends with him?

Mr. Carino: No.

Mr. Presiado: Okay. Well, I should probably first ask, at some point in time, did your friendship with Mr. Depp end?

Mr. Carino: Yes.

Mr. Presiado: And when was that?

Mr. Carino: I would say at the time he left CAA.

Mr. Presiado: And did him leaving CAA had something to do with the end of the friendship?

Mr. Carino: I don't know.

Mr. Presiado: Are you still friends with Ms. Heard?

Mr. Carino: No.

Mr. Presiado: And when did that friendship end?

Mr. Carino: Probably when the legal disputes started.

Mr. Presiado: And what legal dispute are you referring to? This one?

Mr. Carino: I'm not sure which one was first, but one of the disputes between Johnny and Amber.

Mr. Presiado: Okay. But your friendship with... You're not referring to their divorce, correct?

Mr. Carino: Correct.

Mr. Presiado: Okay. So you remain friends with both of them through their divorce. Is that accurate?

Mr. Carino: Yes.

Mr. Presiado: Although you're no longer friends with Mr. Depp, do you have any animosity towards him?

Mr. Carino: I do not.

Mr. Presiado: And same question with respect to Ms. Heard. Although you're not friends with her any longer, do you have any animosity towards her?

Mr. Carino: I do not.

Mr. Presiado: Do you recall when it is the last time you spoke with Ms. Heard?

Mr. Carino: I do not.

Mr. Presiado: Would it have been around the same time that your friendship ended with her?

Mr. Carino: I would assume so.

Ms. Lecaroz: Exhibit 16.

Mr. Presiado: Now, Mr. Carino, you'll see at the bottom here and I don't know if you can see it. Do you see at the bottom, it has a date stamp number under the yellow tag, CC0070?

Mr. Carino: Yes.

Mr. Presiado: Do you recognize this document? And take your time if you need to review it.

Mr. Carino: Yes.

Mr. Presiado: Okay. And do you understand this to be a true and authentic copy of email exchange in which you were involved?

Mr. Carino: I believe so.

Mr. Presiado: Okay, okay. And you'll see it's dated January 11, 2018 and the subject is WME. Do you know what... What is your understanding of what WME is?

Mr. Carino: William Morris Endeavor.

Mr. Presiado: And what is that?

Mr. Carino: It's another talent agency.

Mr. Presiado: Okay. And you've read this email from Ms. Heard to you, correct?

Mr. Carino: Correct.

Mr. Presiado: So at this point in time, was she a close friend of yours?

Mr. Carino: No.

Mr. Presiado: And ultimately, did she leave CAA?

Mr. Carino: Yes.

Mr. Presiado: And it was at this time?

Mr. Carino: Yes.

Mr. Presiado: During the entire time you represented Ms. Heard, did Mr. Depp ever interfere with your representation of Ms. Heard?

Mr. Carino: No.

Mr. Presiado: Did he ever ask you to do anything with respect to her career?

Mr. Carino: Not that I can recall.

Ms. Lecaroz: Exhibit 17.

Mr. Presiado: Now, Mr. Carino, this particular document was not produced by you. You'll see that at the bottom here, a date stamp indicates ALH. That means it was produced by Ms. Heard and this appears to be a text exchange between you and her. It's about a page and a half. If you could take the time to read it and then I will ask you questions about it. And you'll see at the top, Mr. Carino, that it's dated July 14th, 2016. Based on that date and based on reading this text exchange, at this point in time, were you close friends with both Mr. Depp and Ms. Heard?

Mr. Carino: Yes.

Mr. Presiado: And having read the text exchange, do you believe this to be a true and correct representation of the exchange?

Mr. Carino: Yes.

Mr. Presiado: And to be authentic in that regard?

Mr. Carino: Yes.

Mr. Presiado: Now, you start the text exchange by indicating, "JD just heard this." What is the JD reference?

Mr. Carino: Johnny Depp.

Mr. Presiado: And she says, "I saw Laurel" yesterday. Who is laurel?

Mr. Carino: Laurel is a therapist.

Mr. Presiado: Do you know her full name?

Mr. Carino: Laurel Anderson.

Mr. Presiado: And did you independently know Laurel?

Mr. Carino: Yes.

Mr. Presiado: Did you have anything to do with Laurel seeing either Ms. Heard or Mr. Depp?

Mr. Carino: Yes.

Mr. Presiado: And can you explain that to me, please?

Mr. Carino: I introduced them all.

Mr. Presiado: And what was the purpose of you introducing her to them?

Mr. Carino: They needed help.

Mr. Presiado: And can you explain to me in more detail what you mean by that?

Mr. Carino: I think it was at a time where they needed somebody to help mediate the difficulties they were having.

Mr. Presiado: And what do you mean by difficulties?

Mr. Carino: Those strains on their relationship.

Mr. Presiado: And in that regard, did you have conversations with Ms. Heard about the state of her relationship with Mr. Depp?

Mr. Carino: Yes.

Mr. Presiado: I'm trying to determine for how long a period of time did Ms. Heard have conversations with you about the state of her relationship with Mr. Depp. Can you give me a timeframe?

Mr. Carino: I would say she talked to me about the state of the relationship from the beginning until the end.

Mr. Presiado: The entire time you knew her? I'm sorry. The entire time you considered her a friend?

Mr. Carino: Yeah.

Mr. Presiado: Okay, okay. And how about Mr. Depp? Did you have conversations with him about the state of his relationship with Ms. Heard?

Mr. Carino: Yes.

Mr. Presiado: And were those ongoing during the entire time you were friends with him?

Mr. Carino: Yes.

Mr. Presiado: Would you say they both confided in you in that regard?

Mr. Carino: Yes.

Mr. Presiado: So back to this text exchange. Now, where my cursor is, Ms. Heard says to you, "Yeah, she said that Johnny and I need to talk directly." Do you know who Ms. Heard is referring to there?

Mr. Carino: Laurel.

Mr. Presiado: That was your understanding after reading this?

Mr. Carino: Yes.

Mr. Presiado: Okay. And then you asked her, "Do you want to do something tomorrow?" She says, "Yeah." She says, "IDP. I do." You say, "Ha. Okay." And then you say, "What is safe to do? Do you want to come to my place for dinner?" What did you mean by "What is safe to do"?

Mr. Carino: It meant avoiding paparazzi.

Mr. Presiado: Okay. And then she says, "It's so fucked up. I just want to tell him that what they are telling him isn't true." What was your understanding of what she meant by that sentence?

Mr. Carino: I don't recall.

Mr. Presiado: Mr. Carino, while she's doing that, at the outside of this deposition, I asked you if you recall being deposed about a year ago in this case and you said yes. Is that accurate?

Mr. Carino: Yes.

Mr. Presiado: Okay. What I'm gonna show you now is the transcript, a portion of the transcript from that deposition. And who is Mr. Bruckheimer?

Mr. Carino: Jerry Bruckheimer is the producer of the Pirates franchise?

Mr. Presiado: And who is Mr. Whigham.

Mr. Carino: Jack Whigham was an agent at CAA, who worked with Johnny.

Mr. Presiado: Okay. And who is Mr. Lourd?

Mr. Carino: Bryan is one of the managing partners of CAA and also worked on Johnny Depp.

Mr. Presiado: And what was your understanding of why the Pirates 6 job was not offered to Mr. Depp?

Mr. Carino: Leo, are you asking my opinion?

Mr. Presiado: Yes.

Mr. Carino: Because of the accusations that Amber had made.

Mr. Presiado: And what I'm about to show you, Mr. Carino, is a article in the Washington Post authored by Ms. Heard. You're gonna notice that the article will be presented sideways. So you'll have to tilt your head a bit to review it.

Ms. Lecaroz: Exhibit 19.

Mr. Presiado: First, Mr. Carino, why don't you take control and just scroll through the document? It's just a couple pages.

Mr. Carino: Is this the top of the next page?

Mr. Presiado: Yeah, when there's a jump like that, it's just at the top of the next page.

Mr. Carino: Okay.

Mr. Presiado: Mr. Carino, have you seen this document before?

Mr. Carino: Yes.

Mr. Presiado: Do you know who wrote this document?

Mr. Carino: Yes.

Mr. Presiado: Who wrote this document?

Mr. Carino: Amber.

Mr. Presiado: Amber Heard?

Mr. Carino: Yes.

Mr. Presiado: And do you see there on this first page of the document, it actually indicates that it's written by Amber Heard on December 18th, 2018?

Mr. Carino: Yes.

Mr. Presiado: And you understand that this document was authored by Ms. Heard and published on December 18th, 2018?

Mr. Carino: Yes.

Mr. Presiado: And do you recall reading it at the time it was published?

Mr. Carino: No.

Mr. Presiado: Mr. Carino, I'm showing you an email exchange in which you were involved. It's just this one page. I'll blow it up so you can review. Take a second to review it, please.

Mr. Carino: Okay.

Mr. Presiado: And let's start at the bottom of this. Well, you see at the top that the email rayline is entitled, "Johnny Depp's Jack Sparrow won't return in the new 'Pirates of the Caribbean' movie"?

Mr. Carino: Yes.

Mr. Presiado: And this email exchange was on December 20th, 2018, correct?

Mr. Carino: Correct.

Mr. Presiado: And do you recall that the article you just read published by Ms. Heard was published on December 18th, 2018, two days before this?

Mr. Carino: Yes.

Mr. Presiado: Okay. Now, if you go to the bottom of this email, do you see there is this link to an article?

Mr. Carino: Yes.

Mr. Presiado: And it says, URL, the defense... I'm sorry. It says movieweb.com.

Mr. Carino: Yes.

Mr. Presiado: Mr. Carino, what I put up next to the email exchange that we've been discussing is an article dated December 20th, 2018. Okay. So this article is dated December 20th, 2018 and the email sent to you by Robin Baum is that same day, December 20th, 2018. Correct?

Mr. Carino: Yes.

Mr. Presiado: Who is Ms. Baum?

Mr. Carino: Johnny's publicist.

Mr. Presiado: Okay. And she's sending this article to you. Is that right?

Mr. Carino: Yes.

Mr. Presiado: And then in response you say, "Were we told this officially from Disney?" And she responds... I'm sorry. Jack Whigham responds, "No." Is that accurate?

Mr. Carino: Yes.

Mr. Presiado: Sure. So you testified just a few minutes ago that it was your opinion that Mr. Depp lost the Pirates 6 movie because of Ms. Heard's allegations. Is that accurate?

Mr. Carino: Yes.

Mr. Presiado: Allegations of abuse, correct?

Mr. Carino: Yes.

Mr. Presiado: And is this a demonstration of when Disney made that decision to not hire Mr. Depp for Pirates 6?

Mr. Carino: Yes.

Ms. Lecaroz: Exhibit 22.

Mr. Presiado: Did you ever see Mr. Depp physically abused Ms. Heard?

Mr. Carino: No.

Mr. Presiado: Did Ms. Heard ever tell you that she had been physically abused by Mr. Depp?

Mr. Carino: No.

Mr. Presiado: Did Mr. Depp ever tell you that he had physically abused Ms. Heard?

Mr. Carino: No.

Mr. Presiado: Did you ever witness any injuries on Ms. Heard that would indicate that she was physically abused?

Mr. Carino: No.

Mr. Presiado: Now again, this is a few months after the filing of the divorce papers and the TRO, and Ms. Heard states to you, "I'll call you right back. Sorry." And you say, "Okay." She says, "Is it too late to call?" And you say, "Just finishing dinner. We'll call you as soon as we walk out within 20." And she says, "Please tell him I love him." Is that an accurate reading of the text exchange so far?

Mr. Carino: Yes.

Mr. Presiado: Do you know if at this time based on your relationship with Ms. Heard and Mr. Depp, whether Ms. Heard wanted to reconcile with Mr. Depp?

Mr. Carino: Yes.

Mr. Presiado: It's your understanding that she did?

Mr. Carino: Yes.

Mr. Presiado: Did Ms. Heard... Based on your personal friendship with Ms. Heard, close personal friendship with Ms. Heard, would you say that she confided in you?

Mr. Carino: Yes.

Mr. Presiado: And what about Mr. Depp?

Mr. Carino: Yes.

Mr. Presiado: Mr. Carino, at some point in time after Ms. Heard filed those divorce papers in May of 2016, did she make any requests of you to intervene in the relationship between her and Mr. Depp?

Mr. Carino: What do you mean by intervene?

Mr. Presiado: Let's start with assisting communications between the two.

Woman 4: Objection. Same objections.

Mr. Presiado: Can you explain to me what transpired in that regard? Walk me through it.

Mr. Carino: At some point around that time, she wanted me to arrange for them to get together in-person.

Mr. Presiado: And what did you do after that was requested of you by Ms. Heard?

Mr. Carino: I talked to Johnny about it.

Mr. Presiado: What happened after that?

Mr. Carino: He was reluctant at first and then agreed.

Mr. Presiado: And then what happened after that?

Mr. Carino: I mean, this is long time ago, but I remember there was a fair amount of discussion about the TRO and how we would deal with that because nobody wanted Johnny accused of violating the TRO as an

outcome of that meeting. And I don't remember exactly what we did. But Amber at some point warranted that she would never accuse him of violating the TRO to do the meeting. And I set the meeting up.

Mr. Presiado: So, just so I understand, you set the meeting up at the request of Ms. Heard?

Woman 4: Objection.

Mr. Presiado: And as part of you setting up, she told you that it didn't matter? I'm trying to understand what was the issue with respect to the TRO.

Mr. Carino: My understanding of the restraining order at least at the time was that he couldn't go within a certain distance of her.

Mr. Presiado: Okay. And what was her suggestion with respect to that issue in connection with her wanting to meet with him?

Mr. Carino: She promised me and told me to relay to him that she would never accuse him of violating the restraining order as a result of agreeing to meet her. And I believe, but I don't recall exactly, there were conversations with both sides legally, I believe at the time to make it transparent to everybody that this was happening.

Mr. Presiado: Okay. And then what happened next?

Mr. Carino: I arranged the meeting. Johnny was in San Francisco on tour and I arranged to borrow a friend's house. And Amber and I flew to San Francisco, and drove to the house. And Johnny showed up a few hours later.

Mr. Presiado: And did the two of them meet?

Mr. Carino: Yes.

Mr. Presiado: In the same room?

Mr. Carino: They sat outside.

Mr. Presiado: Okay. How close to each other were they?

Mr. Carino: Inches away from each other.

Mr. Presiado: And how long were they out there talking? For how long were they out there talking?

Mr. Carino: Several hours.

Mr. Presiado: Although you were out there, were you in a position where you could see them through a window or otherwise?

Mr. Carino: Yes.

Mr. Presiado: At some point in time, the conversation ended, correct?

Mr. Carino: Correct.

Mr. Presiado: And what happened after that?

Mr. Carino: I received a call or a text from Steve, whose house it was, and he notified me that he would be coming back to the house within the next hour or so. And I told Johnny and Amber. And we decided to rent a hotel room in San Francisco, so that they could continue to talk.

Mr. Presiado: And did that in fact happen?

Woman 4: Objection.

Mr. Presiado: And at some point in time you left that house, correct? To go to San Francisco?

Mr. Carino: Yes.

Mr. Presiado: And was it the three of you?

Mr. Carino: No, Johnny had security with him and we talked about the fact that it wouldn't be a good idea for them to be seen together there. So Johnny left with his security in his car and I believe Amber and I took an Uber.

Mr. Presiado: And what happened after that?

Mr. Carino: We all met at the hotel room.

Mr. Presiado: And do you know what happened after that?

Mr. Carino: They started arguing.

Mr. Presiado: And do you recall any details of the argument?

Mr. Carino: No.

Mr. Presiado: And for how long were you... Was this argument had in a hotel room?

Mr. Carino: Yes.

Mr. Presiado: Did you witness the entire discussion or did you leave at some point?

Mr. Carino: I left the next morning, at 5:00 in the morning or 6:00 in the morning.

Mr. Presiado: And Mr. Carino, I'm showing you emails over produced by you. First, the bottom of the first page, it starts at the bottom of the first page, the string above it was redacted and you'll see that it starts on August 7th, 2017. Do you see that?

Mr. Carino: August 7th, 2017. Yes.

Mr. Presiado: Having read it, can you determine who you're speaking with in this text exchange?

Mr. Carino: Amber.

Mr. Presiado: Oh, hang on. Let me ask you this. Do you know whether or not Ms. Heard ever had a relationship with Mr. Elon Musk?

Mr. Carino: Yes.

Mr. Presiado: And she did?

Mr. Carino: Yes.

Mr. Presiado: So again, it's dated August of 2017 and she says, "Dealing with breakup. I hate when things go public. See, I'm so sad." Having reviewed the document again, do you have an understanding of what she's referencing there?

Mr. Carino: I believe she's referring to breaking up with Elon.

Mr. Presiado: You say, "It seems like a press release. You weren't in love with him and you told me a thousand times you were just filling space." What are you saying there?

Mr. Carino: I'm saying, why would you be sad if you weren't in love with him to begin with?

Mr. Presiado: And by him you're referring to who?

Mr. Carino: Elon.

Mr. Presiado: Okay. And at this point in time, were you still close friends with Ms. Heard?

Mr. Carino: Looks like that's the case at that time. Yes.

Mr. Presiado: And at this point in time, did she confide in you about her relationships?

Mr. Carino: Yes.

Mr. Presiado: Okay. And you respond... I'm sorry. She responds, "I know, but I wanted time to grieve and recover in my own time." Is she still referring to Mr. Musk there? Do you know to your understanding?

Mr. Carino: I don't know whether she's referring to Johnny or to Elon in that line.

Mr. Presiado: Okay. In this point in time, do you know what her feelings were... At this point in time, what was your understanding... Based on your experience with her, what was your understanding of her relationship with Mr. Depp?

Mr. Carino: I don't believe there was a relationship at that point.

Mr. Presiado: And you say, "And you got that. No?" She says, "I hate that yet again a man lets me fall on the spikes by myself." You ask, "How so?" She says... Oops. "Meaning they are mad at me for leaving them and put things like this out there." You say like... Sorry. She says, "Like that." You say, "You could avoid all this if you stop dating uber famous people. You can be with a big man who isn't famous." What were you relating to her there?

Mr. Carino: I believe what I was saying was if you don't like being in the press about your personal life, then don't date people that are famous.

Mr. Presiado: Sure. You indicated that she moved on immediately after JD, after, I'm sorry, after Johnny Depp to date Elon Musk. Is that accurate?

Mr. Carino: Yes.

Mr. Presiado: Okay, sure. Do you have an understanding in one way or another whether Ms. Heard and Mr. Musk were in fact dating at the time of the San Francisco reconciliation that she asked you to set up?

Mr. Carino: I don't know whether they were dating, but they had definitely spent time together.

Mr. Presiado: Do you know how long after the San Francisco attempted reconciliation you gained the understanding that Elon Musk and Ms. Heard were in fact dating?

Mr. Carino: I don't know exactly how long, but not long after.

Mr. Presiado: Do you know who she's with or what was your understanding of who she was referring to when she has said here, "I love him"?

Mr. Carino: Johnny.

Mr. Presiado: Based on this exchange did you have an understanding at this time whether Ms. Heard wanted to reconcile with Mr. Depp?

Mr. Carino: I believe she did.

Mr. Presiado: And at this point in time, she was still a close personal friend of yours, correct?

Mr. Carino: Yes.

Mr. Presiado: And at this point in time, did she consider you a confidant in your understanding?

Mr. Carino: I think, yes.

Mr. Presiado: Okay. Just to authenticate this document again, Mr. Carino, do you see that it's referenced at the bottom date-stamped CC indicating that you produced this document?

Mr. Carino: Yes.

Mr. Presiado: And of having read this, do you perceive this as a trunk or a copy of the text exchange between you and Ms. Heard?

Mr. Carino: Yes.

Mr. Presiado: Okay. And I will... Can you see the very top here, it's dated August 16th, 2017?

Mr. Carino: Yes.

Mr. Presiado: And Ms. Heard states to you, "I've written so many notes. Can you give him one? I don't know how or where to start. There's no way to begin and all I have to say, but I have so many. Finally, I am single, clear in my heart and mind. I just want him to know I loved him and that I am sorry." Do you have an understanding of who Ms. Heard is referring to here?

Mr. Carino: Yes.

Mr. Presiado: And who is Ms. Heard referring to in this text?

Mr. Carino: Johnny.

Mr. Presiado: And what is she asking you to do here?

Mr. Carino: She was asking me to deliver a letter that she was writing to him.

Mr. Presiado: And did she also want you to... And it says, "And that I am sorry." What was your understanding what she was asking you to do there if anything?

Mr. Carino: I believe that was all in reference to getting him a handwritten letter that she was writing or trying to write.

Mr. Presiado: Was it your understanding at the time of this text exchange, August 24th, 2017, that Ms. Amber was attempting to reconcile with Mr. Depp?

Mr. Carino: I believe so.

Mr. Presiado: Okay. And I know maybe this may sound repetitive, but on August 20... At the time of this text on August 24th, 2017, you and her were still close personal friends, correct?

Mr. Carino: I believe so.

Mr. Presiado: There's not much here at all, Mr. Carino, but I did want to confirm that this was the document produced by you, correct? Based on the date stamp on the bottom?

Mr. Carino: Yes.

Mr. Presiado: And do you see it's dated September 27th, 2017?

Mr. Carino: September 23rd.

Mr. Presiado: Oh, you're right. My apologies. It's dated September 23rd, 2017 and it's a text to you that says, "God, I miss him." Do you have an understanding of who Ms. Heard is referring to there?

Mr. Carino: Yes.

Mr. Presiado: And who's that?

Mr. Carino: Johnny.

Mr. Presiado: And do you see at the bottom the date of the text is June 9th, 2018?

Mr. Carino: Yes.

Mr. Presiado: Okay. And it says, "I text him happy birthday." Do you know who sent that and who the him is?

Mr. Carino: I assume this is from Amber and she's talking about Johnny.

Mr. Presiado: You've had a chance to review the whole document, Mr. Carino. What does this appear to be?

Mr. Carino: It appears to be the communications around the time that we set up a meeting in San Francisco.

Mr. Presiado: And who are these communications between?

Mr. Carino: Me and Johnny.

Mr. Presiado: Okay. And this first bubble, can you tell if the blue is you or Mr. Depp?

Mr. Carino: I think the blue is me.

Mr. Presiado: Sure. Earlier in your deposition at the very outset, I was asking you about your representation of individuals at CAA. You indicated that you represent individuals that are both actors and musicians. Would you consider Mr. Depp in that pool?

Mr. Carino: Yes.

Mr. Presiado: And you represented or CAA representative both in connection with his acting endeavors and his involvement with the Vampires?

Mr. Carino: Yes.

Mr. Presiado: And was Mr. Depp's participation in Hollywood Vampires lucrative?

Mr. Carino: No.

Mr. Presiado: Do you know whether or not it was something Mr. Depp enjoyed?

Mr. Carino: Yes.

Judge Azcarate: Your next witness.

Ms. Lecaroz: Plaintiff calls Laura Wasser by deposition, Your Honor. W-A-S-S-E-R.

Judge Azcarate: Thank you.

Ms. Bredehoff: Will you please state your name and address for the record?

Ms. Wasser: Laura Allison Wasser. Wasser, Cooperman & Mandles. Suite, 800, 2049 Century Park East, Los Angeles at 90049.

Ms. Bredehoff: Thank you. What is your occupation?

Ms. Wasser: I'm an attorney at law.

Ms. Bredehoff: And how long have you been an attorney?

Ms. Wasser: Twenty-six years.

Ms. Bredehoff: You represented Mr. Depp in the divorce against Amber Heard. Is that correct?

Ms. Wasser: Yes.

Ms. Bredehoff: And you are here under subpoena?

Ms. Wasser: Yes.

Ms. Bredehoff: Your practice has primarily been focused on domestic relations in California. Is that correct?

Ms. Wasser: Yes.

Ms. Bredehoff: Are you a member of any bar other than California?

Ms. Wasser: No.

Ms. Bredehoff: During the period 2012 to 2016, was California a no-fault state with respect to divorce?

Ms. Wasser: The answer is that California was a no-fault state during that period.

Ms. Bredehoff: During the period 2012 to 2016, was California a community property state with respect to the division of assets in the divorce?

Ms. Wasser: Yes.

Ms. Bredehoff: And what does that mean to you?

Ms. Wasser: California as a community property state and what that means to me is that assets which were earned or created during the course of the marriage absence some other theory of law applied be divided equally.

Ms. Bredehoff: And what do you mean by absence some theory or law applied?

Ms. Wasser: I'm sorry, Elaine. What was the question? Oh, a theory of a law... When I say a theory of law, I mean, if there's a premarital agreement, if there's some other... It's not completely blanket community property. There may be things that were earned from a separate property source that would not be considered community property. So I was just trying to provide for the record some exceptions to what would be considered community property and therefore, divide it equally.

Ms. Bredehoff: Now, if someone alleges domestic violence or abuse against their spouse, would that change the amount they would otherwise be entitled to under community property laws?

Ms. Wasser: No.

Ms. Bredehoff: In obtaining a temporary restraining order, what is your understanding of the process?

Ms. Wasser: The moving party files generally with 24 hours notice to the person who is being accused of domestic violence a declaration and forms with the court, and requests a temporary domestic violence restraining order. That will generally last no longer than a 21-day period when the defendant is able to make his or her arguments as to why such a restraining order would be inappropriate.

Ms. Bredehoff: And the temporary restraining order, can it be continued?

Ms. Wasser: Yes.

Ms. Bredehoff: When did you first begin representing Mr. Depp relating to his divorce with Amber Heard?

Ms. Wasser: I believe it was in December of 2015.

Ms. Bredehoff: I'm going to ask you to pull up document 1, Wasser document 1. And let's go ahead and label that as Wasser Exhibit Number 1. Ms. Wasser, I'm going to ask you to take a look at what has been marked as Wasser Deposition Exhibit Number 1. It is a letter dated May 24, 2016. It's addressed to Jacob Bloom and it says, "Re: In re Marriage of Depp." Do you see that?

Ms. Wasser: Yes.

Ms. Bredehoff: Okay. And it's from Samantha Spector, who indicates she's representing Amber Heard. As of the time of this letter, had you

made known to Amber Heard, or Ms. Spector, or anyone else related to them that you represented Mr. Depp?

Ms. Wasser: I don't believe so.

Ms. Bredehoff: Did you receive a copy of this letter from someone?

Ms. Wasser: I believe so. I think I've seen it before. So, yes.

Ms. Bredehoff: Did you receive this letter on or around May 24, 2016?

Ms. Wasser: Okay. Next page, please. Hang on. Yes, it was around that time.

Ms. Bredehoff: Around May 24, 2016?

Ms. Wasser: Yes.

Ms. Bredehoff: Did you have any communications with Samantha Spector in connection with this letter?

Ms. Wasser: Yes.

Ms. Bredehoff: And when you say within days, could it have been the same day of May 24th, the next day, 25th?

Ms. Wasser: Possibly. I'm going to direct your attention to the next paragraph. It says, "To this end, please have Johnny promptly sign and return by Friday of May 27th, 2016, the enclosed Notice of Acknowledgement Receipt form confirming service of the Summons, Petition, Law Case Cover Sheet, and blank response." Did you do that?

Ms. Wasser: This letter was not directed to me, Elaine.

Ms. Bredehoff: No. I understand it, but it was given to you, correct?

Ms. Wasser: I believe so.

Ms. Bredehoff: And you were representing Mr. Depp, correct?

Ms. Wasser: Yes.

Ms. Bredehoff: And Mr. Bloom did not represent Mr. Depp in connection with the divorce, correct?

Ms. Wasser: Correct.

Ms. Bredehoff: So once Mr. Bloom gave this to you, then did you represent Mr. Depp going forward in communications with Samantha Spector?

Ms. Wasser: Once we received this letter, our firm took over with representation of Mr. Depp in the dissolution action. I cannot recall whether or not the request made was done by Friday, May 27th, but I believe that it was probably that Notice and Acknowledgement of Receipt somewhere with a date on it.

Ms. Bredehoff: Now, the next section I think is something that you referred to earlier. It said, "In addition, we are requesting on Amber's behalf the following, appropriate pendente lite support." Did you have any understanding of what that amount might be at the time that you saw this letter?

Ms. Wasser: I did not have an understanding of what appropriate pendent lite support would be at that time.

Ms. Bredehoff: Did you ask Samantha Spector?

Ms. Wasser: I don't recall. I don't recall our specific communications regarding her requests.

Ms. Bredehoff: Do you recall making any kind of counter to any of these items?

Ms. Wasser: All I recall is that without any notice to us at 8:30 in the morning on the 27th, Samantha Spector and her client went into court and obtained a no notice ex parte restraining order.

Ms. Bredehoff: Have you had any communications with Samantha Spector prior to her going into court on that Friday, May 27th?

Ms. Wasser: Yes.

Ms. Bredehoff: How many communications had you had with Ms. Spector prior following getting this letter and prior to her going into court at 8:30 on May 27, 2016.

Ms. Wasser: I do not recall.

Ms. Bredehoff: Do you have a recollection of whether any of the communications that you had with Ms. Spector between the receipt of this letter that's dated May 24, 2016 and Ms. Spector going into court on Friday, May 27th, 2016, related in any way to request on your behalf, on behalf of your client that you made?

Ms. Wasser: No.

Ms. Bredehoff: You recall having communications with Samantha Spector between May 24 and May 27. You can't recall how many and you can't recall the specifics of those communications. Is that accurate?

Ms. Wasser: It's not accurate.

Ms. Bredehoff: And in what way? Please tell me.

Ms. Wasser: I recall that we had communications between the 24th and probably the 26th. I doubt we spoke on the morning of the 27th before she went into court. I do not know the content of those communications and I do not know how many communications we have.

Ms. Bredehoff: Now, on the next paragraph, it has a proposal for private retired judicial officers. Ultimately, did you and Ms. Spector talk about using private retired judicial officers, whether it was the list she provided or any others?

Ms. Wasser: I believe so. Yes.

Ms. Bredehoff: And what do you recall?

Ms. Wasser: My recollection is that is in almost all of our cases, certainly those with high profile clients, we would have liked to take it out of the system and Ms. Spector was not willing to do that with this case.

Ms. Bredehoff: What do you recall Ms. Spector saying to indicate that she did not want to take it out of the [inaudible 03:56:19]

Ms. Wasser: I don't recall her saying anything.

Ms. Bredehoff: Okay. Now, your understanding was that a class DV TRO was in fact obtained on Friday, May 27, 2016 by Ms. Heard against Mr. Depp, correct?

Ms. Wasser: That is my understanding.

Ms. Bredehoff: After that, did there come a time that you or anyone at your law firm communicated with the Eastern Columbia Building concierge staff or management?

Ms. Wasser: Was those the downtown lofts?

Ms. Bredehoff: The penthouse lofts? Yes. And if it's easier for you everyone's been referring to the Eastern Columbia Building as ECB, would that be helpful at all?

Ms. Wasser: Sure.

Ms. Bredehoff: If you prefer to call them the penthouse loft building, that's fine too.

Ms. Wasser: Now, that we've identified them, I understand what you're talking about. We can call them whatever you'd like. Did someone from my firm speak with somebody at those buildings? Yes.

Ms. Bredehoff: And who from your firm spoke with someone at the buildings and when?

Ms. Wasser: I believe either I did or my partner, Samantha Klein, or an associate who is also working on the case, Lisa Sutton from our firm. We also had co-counsel on the case. They may have been involved. As to when, I have to imagine it was sometime in June or July of 2016.

Ms. Bredehoff: Now, you indicated either you or Samantha Klein, or Lisa Sutton, and you also had co-counsel. Do you have a specific recollection of speaking with anyone at the ECB building?

Ms. Wasser: I don't.

Ms. Bredehoff: What were Samantha Klein's communications with the ECB building?

Ms. Wasser: I don't know.

Woman 2: What were Samantha Klein's communication with the ECB building? And her answer was "I don't know."

Man 2: Thank you.

Ms. Bredehoff: Ms. Wasser, what were Lisa Sutton's communications with the ECB building?

Ms. Wasser: I don't know.

Ms. Bredehoff: What were your co-counsel's communications with the ECB building? When I say ECB building, I'm not talking about the structure. I'm talking about the individuals who worked there.

Ms. Wasser: I don't know.

Ms. Bredehoff: And just so we're clear here, you don't recall any communications with the ECB building staff as well, correct?

Ms. Wasser: You asked me if I had a specific recollection. I do not.

Ms. Bredehoff: Do you have a general recollection?

Ms. Wasser: I believe that at some point, we subpoenaed the building's records of the video from the lobby and elevator areas. So I would imagine that the communications would have to do with those subpoenas.

Ms. Bredehoff: Are you able to testify to any conversation you or anyone at your firm, or your co-counsel had with the ECB building staff?

Ms. Wasser: I am sure that there were conversations and communications regarding the production of the subpoenaed documents, review of the subpoena documents that our compliance with, I believe it was Ms. Spector's subpoena that was sent. Our ability to review the video's coordination of same, but I don't have a specific recollection of any communications.

Ms. Bredehoff: Are you able to speak to whether there were any conversations between you, anyone at your law firm, or your co-counsel and an ECB building personnel prior to your issuing the subpoena?

Ms. Wasser: Also, I don't believe that the subpoena was issued by our firm, I assume.

Ms. Bredehoff: So you don't have a recollection of a subpoena being issued on Mr. Depp's behalf for the ECB building surveillance tapes?

Ms. Wasser: I don't know. I know there was one issued. I believe it was issued by Ms. Spector.

Ms. Bredehoff: Let's talk about the videos that you just referred to from the ECB building staff. How did you and your firm, or your co-counsel receive these videos?

Ms. Wasser: I don't recall. I would imagine like an e-file or something like that.

Ms. Bredehoff: Now, is it your recollection that there was just one e-file that contained all of the surveillance tapes?

Ms. Wasser: I don't have a recollection as to whether it was one, or seven, or what. I just don't know.

Ms. Bredehoff: When you were talking about receiving the video surveillance footage on whatever, whether it was one file or seven files, whether it was e-file or whatever, did you have any understanding that you were not provided the full amount that was requested, whatever the amount was?

Ms. Wasser: No.

Ms. Bredehoff: So you thought you received whatever you were supposed to receive. Is that clear?

Ms. Wasser: Yes.

Ms. Bredehoff: What did you do with the actual surveillance video footage that you received?

Ms. Wasser: I believe we kept it on the computer at least for the next couple of months in preparation for trial. I don't know where it is now.

Ms. Bredehoff: Do you... That's my next question. Is there a time that you no longer possess the video surveillance footage that was sent to you by the ECB building?

Ms. Wasser: I don't know.

Ms. Bredehoff: Ms. Wasser, I'm going to ask you to take a look at what has been marked as Wasser Deposition Exhibit Number 2 and it's a multi-page document. And so I'm going to scroll down a little bit. But you let me know if I'm going too fast here. It's dated June 3rd and it's to Samantha Klein. She was working with you on the Depp case, correct?

Ms. Wasser: Correct.

Ms. Bredehoff: Okay. And it's from Samantha Spector which you can see there and we'll show you the signature later. And it's litigation called preservation of information, including, but not limited to electronically stored information. Do you see that?

Ms. Wasser: Yes.

Ms. Bredehoff: Do you recall receiving this letter? And if you want me to scroll down and let you read each page, I'm happy to do that first.

Ms. Wasser: I'm familiar with this letter and I recall receiving it.

Ms. Bredehoff: And did you receive this letter before you received the surveillance footage from the ECB building?

Ms. Wasser: I am not sure.

Ms. Bredehoff: Well, I think you had indicated that you thought that it was in June or July that you received the surveillance footage. Is that still the best recollection?

Ms. Wasser: I'm looking at the date and knowing the chronology of the case. It is my best estimate that we received this letter prior to the time that we received the video footage.

Ms. Bredehoff: Ms. Wasser, what steps did you, and your firm, and co-counsel take to preserve the surveillance video footage of the ECB from the time you received it going forward?

Ms. Wasser: I think the absence of us doing anything to destroy the video footage would be the most I could testify regarding in terms of steps that we took to preserve the video footage.

Ms. Bredehoff: Are you aware of any destruction of the video footage, the surveillance video footage from ECB up to the present?

Ms. Wasser: No.

Ms. Bredehoff: We probably still have it. Have you looked for it?

Ms. Wasser: No.

Ms. Bredehoff: Have you been asked to look for it?

Ms. Wasser: No.

Ms. Bredehoff: I'm going to ask you to take a look at what is now has been marked as Wasser Deposition Exhibit Number 3 and it's dated June 6, 2013 addressed to you, and it's from Charles Harder. Did you have an understanding that Mr. Harder also represented Amber Heard?

Ms. Wasser: I did when I received this letter on June 6.

Ms. Bredehoff: And did you have an understanding that Mr. Harder was also asking you to preserve any evidence?

Ms. Wasser: Yes.

Ms. Bredehoff: Okay. Ms. Wasser, I'm going to ask you to take a look at what has been marked as Wasser Deposition Exhibit Number 4. It's dated June 6 as well and it's to Charles Harder from your phone. And you are acknowledging receipt of the preservation demand letter from Ms. Heard as well as his and you indicated, "We are fully aware of our obligations with respect to the preservation of evidence. Please rest assured that we intend to comply with the preservation demand and expect that Ms. Heard will do so as well." Do you recall saying that in this letter?

Ms. Wasser: Yes.

Ms. Bredehoff: And was this letter in fact from you to Mr. Harder?

Ms. Wasser: It was.

Ms. Bredehoff: Ms. Wasser, I'm going to ask you to take a look at what has been marked as Wasser Deposition Exhibit Number 5. It's a letter dated June 21, 2016 to Samantha Spector, Charles Harder, and Leonard Levine, I think it's pronounced, Re: Marriage of Depp, and it's from Samantha Klein. Do you see that?

Ms. Wasser: Mm-hmm.

Ms. Bredehoff: And you are copied on it? Do you see that?

Ms. Wasser: I do.

Ms. Bredehoff: Okay. And Ms. Klein worked through your law firm?

Ms. Wasser: Yes.

Ms. Bredehoff: And represented Ms. Depp as well. Is that correct?

Ms. Wasser: Yes.

Ms. Bredehoff: Okay. I'm going to go back up to the beginning to call your attention to a particular section. It says, "This letter shall confirm the agreements we reached yesterday with respect to the pending domestic violence proceeding." Do you see that?

Ms. Wasser: Mm-hmm.

Ms. Bredehoff: And then we're gonna go down to the media press and it says, "Neither party nor his or her respective counsel representatives or agents to make any comments in the media or press pertaining to this dissolution action. The civil action opinion against Dr. Spiegel and are any pending or future litigation between Amber involving the parties." Do you see that?

Ms. Wasser: Yes.

Ms. Bredehoff: All right. Does that accurately reflect the agreement that was made between the parties with respect to Amber Heard and Mr. Depp in communications with the press?

Ms. Wasser: Yes.

Ms. Bredehoff: Do you know Liz Walters?

Ms. Wasser: Who?

Ms. Bredehoff: Liz Walters.

Ms. Wasser: Yes.

Ms. Bredehoff: And who is she is a reporter or I believe she works for her brother's online media outlet called The Blast.

Ms. Wasser: Did you have any communications with Liz Walters during the Depp-Heard divorce?

Ms. Wasser: I don't recall.

Ms. Bredehoff: Did you have any communications with TMZ relating to the Depp-Heard divorce?

Ms. Wasser: I don't recall.

Ms. Bredehoff: Now, do you recall what the date was for the permanent TRO, temporary restraining order? Do you recall the date that... You said that early on 21 days after the temporary restraining order is typically the date that's set for the hearing for the defendant if they wanna come in and oppose it or if the petitioner wants to extend it. Do you recall what the first date was?

Ms. Wasser: I don't, but I would imagine that it was probably at some point in early June.

Ms. Bredehoff: All right. And then do you recall that date being continued?

Ms. Wasser: I do.

Ms. Bredehoff: How many times?

Ms. Wasser: At least twice. Possibly, three times. I think that the final date was at some point in August and we settled right before then.

Ms. Bredehoff: All right. Allan, can we bring up document number 7?

[04:11:18]

[silence]

[04:11:45]

Ms. Bredehoff: Thank you, Allan. Ms. Wasser, I'm going to ask you to take a look at what has been marked as Wasser Exhibit Number 7. It is dated August 5, 2016. It is to you from Samantha Spector. Do you see that?

Ms. Wasser: Yes.

Ms. Bredehoff: Did you receive this document?

Ms. Wasser: But doesn't it say at the top that it's protected under 1152?

Ms. Bredehoff: It sure does. All I'm asking you is whether you received it or not. I'm not asking you about the substance.

Ms. Wasser: I don't remember.

Ms. Bredehoff: Do you have any reason to believe you did not respond?

Ms. Wasser: I don't.

Ms. Bredehoff: Ms. Wasser, I'm going to ask you to take a look at what would be marked as Wasser Deposition Number 8 and it starts out with the name now from Samantha Spector to Amber on August 6th, 2016. Do you recall what was going on on or around August 16 in the divorce, in connection with the divorce?

Ms. Wasser: Not specifically. No.

Ms. Bredehoff: Do you know who Christian Carino is?

Ms. Wasser: I do.

Ms. Bredehoff: Okay. Who is he?

Ms. Wasser: He's an agent at Creative Artist Agency.

Ms. Bredehoff: How long have you known Christian Carino?

Ms. Wasser: I've known of Christian for maybe 10 years.

Ms. Bredehoff: Were you aware that Mr. Carino was involved in organizing, if you will, or assisting Mr. Depp and Ms. Heard with their own meeting to try to resolve their case up in San Francisco?

Ms. Wasser: Possibly. That sounds vaguely familiar.

Ms. Bredehoff: Were you on the telephone at any point while Amber Heard and Johnny Depp were meeting to discuss resolution of the issues during the summer of 2016?

Ms. Wasser: What was your question? Was I on the telephone?

Ms. Bredehoff: Yes. Were you on the telephone where Mr. Depp and Ms. Heard were in the hotel room and were talking?

Ms. Wasser: No.

Ms. Bredehoff: Were you ever on the telephone when Ms. Heard and Mr. Depp were together talking during the summer of 2016 no matter where they were?

Ms. Wasser: On the telephone?

Ms. Bredehoff: Yes.

Ms. Wasser: No.

Ms. Bredehoff: While he was with Ms. Heard and Ms. Heard was on speaker, and you were on speakerphone with the two of them?

Ms. Wasser: No.

Ms. Bredehoff: Do you recognize the name on [inaudible 04:14:50]

Woman 2: Do you recognize the name on what?

Ms. Bredehoff: Joe Sweeney.

Ms. Wasser: I do.

Ms. Bredehoff: And who is he?

Ms. Wasser: Joe Sweeney is a forensic accountant who specializes in family law forensic accounting and he was Ms. Heard's forensic accountant in the DISO matter.

Ms. Bredehoff: And was Edward White acting as the forensic accountant for Mr. Depp?

Ms. Wasser: No.

Ms. Bredehoff: Did Mr. White provide the documentation that was then submitted to Samantha Spector as counsel for Ms. Heard?

Ms. Wasser: I believe it came from Mr. White's office. Also, probably of note is the fact that Mr. Depp changed business management shortly before or during the course of the case. So it is possible that some of the documents came from predecessor business manager.

Ms. Bredehoff: I'm going to show you what has been marked as Wasser Deposition Exhibit Number 10 and I'm not going to ask you any specific questions. So I don't need you to have to review it in detail unless you'd like to. You're certainly welcome to spend as much time as you'd like on it, but I'm just gonna go down to the end of it. And I'm going to ask if this

is the Deal Point Memorandum that you referred to that was finalized on August 15, 2016?

Ms. Wasser: Since the party's signatures appear at the bottom as well as Ms. Spector's and mine, I believe that this is the Deal Point Memorandum to which I was referring.

Ms. Bredehoff: Okay. Is there any reason to believe that it is not the Deal Point Memorandum?

Ms. Wasser: No.

Ms. Bredehoff: Ms. Wasser, I'm going to ask you to take a look at what has been marked as Wasser Deposition Exhibit Number 11 and it's a series of documents. An FL-150 for example, and then that's page 404, and then it goes into the next part, 101. I'm just trying to page through it for you just so you can see generally. Do you recognize this document?

Ms. Wasser: Yes.

Ms. Bredehoff: Could you tell me what it is, please?

Ms. Wasser: It looks to be one of the party's, I guess Mr. Depp's, what we call in California, preliminary or perhaps final declaration of disclosure. It's just financial disclosure forms.

Ms. Bredehoff: Ms. Wasser, I'm going to ask you if you can take a look at what has been marked as Wasser Exhibit Number 12 and it's many pages. I think it's 50 total. Do you recognize this document?

Ms. Wasser: Yes.

Ms. Bredehoff: And can you tell me what it is?

Ms. Wasser: It's the party's letter of Judgment for Dissolution of Marriage.

Ms. Bredehoff: Is there a specific amount that was paid to Amber Heard as part of this divorce settlement in judgment for...

Mr. Presiado: Objection. I'm sorry.

Ms. Bredehoff: ...for her claims of domestic violence, including any claims of assault, battery, intentional, or negligence, inflection of the motion, distress, libel, slander, and defamation?

Ms. Wasser: I don't believe that we segregated out what the total amount was being paid for.

Ms. Bredehoff: Did you make any effort to seal, S-E-A-L, the records in this case? And I'm referring to the case in front of us, the marriage or partnership of Amber Laura Depp and John Christopher Depp, II filed in Superior Court of California, County of Los Angeles?

Ms. Wasser: When you say seal, do you mean by the court, to ask the court to seal the file?

Ms. Bredehoff: Yes.

Ms. Wasser: I don't believe so.

Ms. Bredehoff: And why not?

Ms. Wasser: We don't do that.

Ms. Bredehoff: Okay. I'm going to ask you to take a look at what has been marked as Deposition Exhibit Number 13 and this is a subpoena of you for this deposition. Did you receive that? Do you want me to scroll through it? Would you like to?

Ms. Wasser: No. I believe that we received it.

Ms. Bredehoff: All right. And you are testifying pursuant to this subpoena, correct?

Ms. Wasser: I am.

Ms. Bredehoff: I'm going to ask you to look at what has been marked as Deposition Exhibit Number 14 and this is for the corporate designee of Wasser, Cooperman & Mandles. Do you see that?

Ms. Wasser: I do.

Ms. Bredehoff: For today's deposition, is it your understanding that you are the corporate designee on behalf of Wasser, Cooperman & Mandles speaking today?

Ms. Wasser: Yes.

Judge Azcarate: Thank you. All right. Ladies and gentlemen, I think giving the hour that'll be all the testimony that you hear today. Okay? So we'll go ahead and recess for the day. Make sure you don't do any outside research and don't talk to anybody. And we'll see you tomorrow. Okay? Get some good rest. All right, thank you. Okay. And tomorrow then, we'll be starting with the other deposition. That's correct? And how long is that or approximately?

Ms. Lecaroz: About two and a half hours.

Judge Azcarate: Two and a half hours. So that'll take care of the morning probably for the most part. And then you have remote witnesses after that, is that correct?

Judge Azcarate: Okay. So you can give me the contact information for those, so we can get that taken care of. All right. Just remember, we do plan accordingly because I do need to take lunch between 1:30 and 2:30 because there's a graduation I have to speak at. So we're going to take care of that. Okay? All right, thank you. Have a good evening.

Judge Azcarate: Thank you, Your Honor.

Man 1: All rise.