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Transcript of Eric George

Date: April 5, 2021

Case: Depp, II -v- Heard

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IN THE CIRCUIT COURT FOR
FAIRFAX COUNTY, VIRGINIA

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

- - - - - x

VIDEOTAPED DEPOSITION OF ERIC GEORGE
HELD REMOTELY
Monday, April 5, 2021
1:30 p.m. Eastern, 10:30 a.m. Pacific

Job No.: 358291
Pages: 1 - 314
Reported By: Debi Pearce

Transcript of Eric George
April 5, 2021

1 Deposition of ERIC GEORGE, held remotely,
2 pursuant to notice, before Debi Pearce, Notary
3 Public in and for the State of Maryland and the
4 Commonwealth of Virginia.

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A P P E A R A N C E S

APPEARING VIA VIDEOCONFERENCE ON BEHALF OF
PLAINTIFF JOHN C. DEPP, II:

BENJAMIN G. CHEW, ESQUIRE
BROWN RUDNICK, LLP
601 Thirteenth Street, N.W.
Washington, D.C. 20005
202.536.1700
bchew@brownrudnick.com

APPEARING VIA VIDEOCONFERENCE ON BEHALF OF
PLAINTIFF JOHN C. DEPP, II:

CAMILLE M. VASQUEZ, ESQUIRE
BROWN RUDNICK, LLP
2211 MICHELSON DRIVE
IRVINE, CALIFORNIA 92612
949.752.7100
cvasquez@brownrudnick.com

1 A P P E A R A N C E S C O N T I N U E D

2

3 A P P E A R I N G V I A V I D E O C O N F E R E N C E O N B E H A L F O F

4 D E F E N D A N T A M B E R L A U R A H E A R D :

5 E L A I N E C H A R L S O N B R E D E H O F T , E S Q U I R E

6 C H A R L S O N B R E D E H O F T C O H E N & B R O W N , P . C .

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13 A P P E A R I N G V I A V I D E O C O N F E R E N C E O N B E H A L F O F T H E

14 W I T N E S S E R I C G E O R G E :

15 R I C H A R D S C H W A R T Z

16 B R O W N E , G E O R G E , R O S S , O ' B R I E N , A N N A G U E Y ,

17 & E L L I S , L L P

18 8 0 1 S . F i g u e r o a S t .

19 S u i t e 2 0 0 0

20 L o s A n g e l e s , C A 9 0 0 1 7

21 2 1 3 . 7 2 5 . 9 8 0 0

22 r s c h w a r t z @ b g r f i r m . c o m

1 A P P E A R A N C E S C O N T I N U E D

2

3 ALSO PRESENT:

4 ALEX SUSSMAN, PLANET DEPOS TECHNICIAN

5 KIM JOHNSON, PLANET DEPOS VIDEOGRAPHER

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1 P R O C E E D I N G S

2 13:34:54

3 THE VIDEOGRAPHER: Here begins the 13:34:54

4 videotape-recorded deposition of Eric George taken 13:35:03

5 in the matter of Depp versus Heard in the Circuit 13:35:06

6 Court for Fairfax County, Virginia 13:35:12

7 Case No. CL-2019-0002911. 13:35:14

8 Today's date is April 5th, 2021. The time 13:35:19

9 is 1:35 Eastern Time. This deposition is being 13:35:23

10 held in different locations via Zoom. The court 13:35:27

11 reporter is Debi Pearce. The video camera 13:35:30

12 operator is Kim Johnson, both are on behalf of 13:35:34

13 Planet Depos. 13:35:35

14 Will counsel please introduce yourself and 13:35:35

15 state who you represent. 13:35:40

16 MS. BREDEHOFT: Good afternoon. My name 13:35:40

17 is Elaine Bredehoft and, together with 13:35:40

18 Clarissa Pintado, we represent Amber Heard. 13:35:45

19 MR. CHEW: Good afternoon. My name is 13:35:47

20 Ben Chew, I'm with Camille Vasquez. She and I 13:35:47

21 represent Plaintiff Johnny Depp. 13:35:55

22 MR. SCHWARTZ: And good morning. This is 13:35:55

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1	Richard Schwartz at Browne, George, Ross, O'Brien	13:35:55
2	Annaguey & Ellis on behalf of the witness.	13:35:59
3	THE VIDEOGRAPHER: Okay. Will the court	13:36:00
4	reporter, please, swear the witness.	13:36:00
5	ERIC GEORGE,	13:36:00
6	HAVING BEEN FIRST DULY SWORN/AFFIRMED, WAS	13:36:00
7	EXAMINED AND TESTIFIED UNDER OATH AS FOLLOWS:	13:36:00
8	THE WITNESS: I do.	13:36:17
9	EXAMINATION	13:36:17
10	BY MS. ELAINE CHARLSON BREDEHOFT:	13:36:17
11	Q Will you please state your name for the	13:36:19
12	record.	13:36:21
13	A Sure. Eric George, E-R-I-C, last name is	13:36:21
14	George, G-E-O-R-G-E.	13:36:28
15	Q And could you also state your business	13:36:28
16	address, please.	13:36:31
17	A Sure. 2121 Avenue of the Stars,	13:36:32
18	Suite 2800, Los Angeles, California 90067.	13:36:38
19	Q And what is the name of the law firm that	13:36:43
20	you work with?	13:36:46
21	A It's Browne, B-R-O-W-N-E, George, Ross,	13:36:46
22	O'Brien, Annaguey & Ellis.	13:36:57

1 Q And you are an attorney, Mr. George? 13:36:57

2 A I am. I am. 13:36:59

3 Q And I take it from the name of the firm 13:37:01

4 that you are one of the named partners? 13:37:01

5 A I am indeed. 13:37:06

6 Q Okay. What are your areas of practice? 13:37:07

7 A Litigation, largely in the business and 13:37:09

8 entertainment areas. 13:37:14

9 Q Have you handled defamation and libel 13:37:15

10 matters? 13:37:19

11 A I have. 13:37:19

12 Q Where are you barred? In other words, 13:37:20

13 what states are you a member of the bar? 13:37:23

14 A Sure. In California, New York, and 13:37:26

15 Washington, D.C. 13:37:30

16 Q And are you also a member or barred in the 13:37:31

17 United States Supreme Court? 13:37:37

18 A I am. 13:37:39

19 Q Can you please tell us where you attended 13:37:40

20 undergraduate and law school. 13:37:43

21 A Sure. Georgetown for both undergrad and 13:37:45

22 law school. 13:37:48

1 Q And how long have you been practicing law? 13:37:49

2 A Since -- towards the end -- I think it was 13:37:52

3 November of 1993, so almost 20- -- let's do the 13:37:58

4 math, almost 28 years. 13:38:09

5 Q And did you also serve, at one point, as 13:38:11

6 counsel to United States Senate Judiciary 13:38:14

7 Committee? 13:38:18

8 MR. CHEW: Objection. Leading. 13:38:18

9 A I did. 13:38:19

10 Q Okay. I'll rephrase. 13:38:22

11 What, if any service, did you have with 13:38:24

12 the counsel of the United States Senate Judiciary 13:38:27

13 Committee? 13:38:32

14 A Sure. In -- I'm just pausing to get my 13:38:32

15 dates correct here. In, approximately, March of 13:38:36

16 1999, I began service as counsel to the U.S. 13:38:48

17 Senate Judiciary Committee, where I served through 13:39:00

18 mid-2000s. 13:39:01

19 Q Okay. And what, if any, service did you 13:39:03

20 have to the secretary -- the legal affairs 13:39:07

21 secretary to then-Governor Pete Wilson? 13:39:10

22 A Sure. From about March 1997, to January 13:39:14

1 of 1999, I was counsel to the then-governor 13:39:22
2 Pete Wilson, and my specific title was deputy 13:39:27
3 legal affairs secretary. 13:39:30

4 Q And what, if any, law clerkships did you 13:39:32
5 have with any judges? 13:39:36

6 A So after law school, I clerked for a year 13:39:37
7 for a federal judge, a district court judge named 13:39:40
8 Lowell Jensen, in the Northern District of 13:39:47
9 California. 13:39:48

10 Q Have you been recognized for your career 13:39:49
11 achievements since you have been an attorney? 13:39:51

12 A I'll say, immodestly, yes, in various ways 13:39:54
13 lawyers are from time to time in magazines and 13:40:03
14 publications and whatnot. 13:40:06

15 Q And what, if any, recognition have you 13:40:07
16 received as one of the top 100 attorneys in 13:40:12
17 California? 13:40:16

18 A The legal paper annually puts out a list 13:40:17
19 of the top 100 attorney in California, and I've 13:40:23
20 been fortunate to be selected as one of those for 13:40:27
21 many years. 13:40:32

22 Q And what, if any, recognition have you had 13:40:35

1 as being a super lawyer in California? 13:40:35

2 A Same answer, except I believe it's called 13:40:37

3 Los Angeles Lawyer Magazine. I could have that 13:40:42

4 wrong, but, annually, they put out a list of their 13:40:44

5 super lawyers. 13:40:49

6 Q And are you also a member of the American 13:40:50

7 College of Trial Lawyers? 13:40:52

8 A I am. 13:40:53

9 Q And the America College of Trial Lawyers 13:40:54

10 recognizes attorneys in the top 1 percent of the 13:41:00

11 state; is that accurate? 13:41:04

12 MR. CHEW: Objection. Leading. 13:41:04

13 MS. BREDEHOFT: All right. I'll rephrase. 13:41:07

14 BY MS. BREDEHOFT: 13:41:09

15 Q What is one of the qualifications for 13:41:11

16 becoming a member, being invited to be a fellow of 13:41:14

17 the American College of Trial Lawyers? 13:41:19

18 A Sure. So the college reaches out to 13:41:22

19 individual lawyers who have distinguished 13:41:25

20 themselves and, generally, occupy the top 13:41:28

21 1 percent of law practice, and it's an 13:41:33

22 organization dedicated to the development of 13:41:35

1 professionalism within the practice of law. 13:41:39

2 Q Thank you very much. 13:41:42

3 I'm going to now turn to Amber Heard, and 13:41:43

4 I'm going to ask you, Mr. George, how long have 13:41:47

5 you known Amber Heard? 13:41:50

6 A I have known Amber Heard -- gosh, it's got 13:41:51

7 to be a good five years, but I'm going to ask if 13:41:58

8 you and Mr. Chew would be able to give me some 13:42:03

9 specifics by way of documents to route me in a 13:42:07

10 particular place in time. 13:42:11

11 Q And I will do that very shortly. 13:42:12

12 I'm going to be referring to an op-ed, and 13:42:15

13 I'm going to use the term "op-ed." It's, 13:42:21

14 obviously, an opinion editorial that Amber Heard 13:42:24

15 ended up, ultimately, publishing, with the ACLU, 13:42:29

16 in the Washington Post, December 18, 2018. So as 13:42:35

17 I go through and ask these questions, I'm going to 13:42:39

18 be using just the term "op-ed." 13:42:42

19 Will you be comfortable with me using 13:42:45

20 "op-ed" and understand it to mean that particular 13:42:47

21 publication on December 18, 2018? 13:42:50

22 A Sure. 13:42:54

1 MR. CHEW: I'm going to object to the 13:42:55
2 characterization, which is inaccurate. 13:42:57

3 MS. BREDEHOFT: In what way? 13:43:01

4 MR. CHEW: The ACLU did not publish 13:43:03
5 Amber's op-ed. Amber published the op-ed that 13:43:07
6 appeared in the Washington Post. 13:43:11

7 MS. BREDEHOFT: Actually, the Washington 13:43:13
8 Post published the op-ed. If you want to really 13:43:13
9 get technical. 13:43:17

10 MR. CHEW: The ACLU likes to hide from 13:43:17
11 service, but they didn't put their name on that 13:43:21
12 op-ed. Probably smart. 13:43:25

13 THE WITNESS: To make things easy, 13:43:26
14 regardless of the derivation of the piece, I will 13:43:26
15 understand -- Mr. Chew, I take it you're good with 13:43:26
16 this as well, that "op-ed" is a reference to the 13:43:36
17 op-ed that was published as being authored by 13:43:36
18 Amber Heard. 13:43:40

19 MR. CHEW: Yes, sir. Thank you. 13:43:40

20 BY MS. BREDEHOFT: 13:43:40

21 Q In the Washington Post. 13:43:42

22 A Correct. 13:43:44

1 Q Okay. Thank you. 13:43:45

2 So what, if any, legal representation did 13:43:45
3 you provide to Ms. Heard relating to the op-ed? 13:43:48

4 A So -- and, again, I want to be clear that 13:43:56
5 it's my understanding, for purposes of answering 13:43:57
6 this question, that Ms. Heard is comfortable with 13:44:00
7 waiving the attorney-client privilege as to that 13:44:04
8 question, and as to what I'm being asked here, and 13:44:08
9 it's under that understanding that I'm answering 13:44:12
10 this. 13:44:12

11 And that, in that capacity, she presented 13:44:15
12 to me a draft of the op-ed, and asked for my 13:44:19
13 counsel in terms of reviewing it, editing it, and 13:44:28
14 finalizing it for publication. 13:44:33

15 Q And Mr. George, thank you for bringing 13:44:35
16 that up. On September 4, 2019, counsel for 13:44:38
17 Mr. Depp and counsel for Ms. Heard, had an 13:44:42
18 agreement, specifically, that there would be a 13:44:47
19 limited waiver of privileges with respect to 13:44:51
20 your -- her communications with the lawyers and 13:44:57
21 outside parties relating specifically to the 13:45:00
22 op-ed, and that was reflected in an e-mail by -- 13:45:05

1 from Robert Gilmore, of Stein Mitchell, who was 13:45:08
2 representing Mr. Depp at that time, and it was 13:45:11
3 dated September 4, 2019. 13:45:14

4 So we have an understanding -- with that 13:45:16
5 understanding, the documents were produced and we 13:45:18
6 are asking these questions today, with the 13:45:20
7 understanding there's not a full waiver, it's a 13:45:23
8 waiver limited to this particular advice on the 13:45:26
9 op-ed. 13:45:30

10 A Thank you, Ms. Bredehoft. I get it and 13:45:31
11 I'm very comfortable proceeding under those terms. 13:45:35

12 MR. CHEW: Just to be clear, in no way do 13:45:39
13 we believe that you can cabin the waiver of 13:45:43
14 attorney-client privilege and we believe -- and we 13:45:48
15 told you this before -- that we believe there is a 13:45:48
16 full waiver of the attorney-client privilege. But 13:45:51
17 we'll agree to disagree until we file the motion 13:45:55
18 to compel. 13:45:58

19 MS. BREDEHOFT: Mr. Chew, are you saying 13:46:02
20 that Mr. Gilmore did not have the authority, on 13:46:04
21 behalf of Mr. Depp, to make that agreement on 13:46:08
22 September 4, 2019? 13:46:10

1	MR. CHEW: I'm explaining to you our	13:46:11
2	position.	13:46:13
3	MS. BREDEHOFT: No, I'm asking	13:46:14
4	specifically are you claiming that Mr. Gilmore did	13:46:16
5	not have the authority to speak on behalf of	13:46:18
6	Mr. Depp in agreeing to that waiver, the limited	13:46:21
7	waiver?	13:46:25
8	MR. CHEW: I'm not being deposed here.	13:46:25
9	Mr. George is being deposed.	13:46:29
10	MS. BREDEHOFT: Right. But I -- you were	13:46:31
11	copied on that e-mail, and so was Camille Vasquez.	13:46:34
12	Is there some claim that, at some point after	13:46:41
13	that, you have changed your position?	13:46:44
14	MR. CHEW: We haven't changed our	13:46:45
15	position. We believe she's already waived	13:46:49
16	attorney-client privilege.	13:46:51
17	MS. BREDEHOFT: I would not only disagree,	13:46:52
18	but I think you would be breaching the agreement	13:46:54
19	that was made by your counsel, with your	13:46:58
20	knowledge, and you being specifically on the	13:47:01
21	e-mail in September of 2019, as I've indicated.	13:47:02
22	BY MS. BREDEHOFT:	13:47:06

1 Q All right. So Mr. George, let's get back 13:47:06
2 to the deposition here. 13:47:08

3 And what was your understanding of the 13:47:10
4 nature of the representation of Ms. Heard in 13:47:13
5 connection with the op-ed? 13:47:18

6 A So I just want to make sure, 13:47:21
7 Ms. Bredehoft, I'm following that question. The 13:47:25
8 nature of the representation to...? 13:47:27

9 Q Ms. Heard. 13:47:30

10 A I'm sorry. I'm not sure I'm following 13:47:32
11 this. The nature of the representation by? 13:47:35

12 Q You know what? That's okay. I'll 13:47:38
13 withdraw that question and go to that later. 13:47:40

14 Let's start with some of the documents, and that 13:47:42
15 might be helpful here. 13:47:44

16 A Sure. Sure. 13:47:47

17 MS. BREDEHOFT: Alex, can we bring up 13:47:47
18 Exhibit No. 3, please. 13:47:49

19 And what's going to happen, Mr. George, is 13:47:57
20 it's going to come up on the screen as we go 13:48:00
21 through these exhibits. 13:48:02

22 THE WITNESS: Okay. So I'm laughing a 13:48:04

1 little bit, as you-all would, if you were in my 13:48:06
2 shoes -- it's a little bit of a distance. Oh, 13:48:09
3 there we go. Okay. Good. 13:48:13
4 MS. BREDEHOFT: That's one of the reasons 13:48:13
5 we have Alex. He's able to help us with things 13:48:15
6 like this. 13:48:18
7 THE WITNESS: Well done, Alex. Okay. 13:48:20
8 MS. BREDEHOFT: So Alex, I'm going to take 13:48:24
9 control. 13:48:28
10 (Whereupon, the above-referenced document 13:48:28
11 was marked as Exhibit No. 3.) 13:48:28
12 BY MS. BREDEHOFT: 13:48:28
13 Q And, Mr. George, I'm going to ask you to 13:48:28
14 take a look at what has been marked as Exhibit 13:48:31
15 No. 3, and it has, here, an e-mail from 13:48:34
16 Amber Heard to you on December 6th, 2018, at the 13:48:38
17 top. And if I pull it down a little bit, we have 13:48:44
18 below it an e-mail from Robin Shulman, at 13:48:49
19 aclu.org, to, among other people, Jessica Weitz, 13:49:00
20 and this is dated December 6th, 2018. 13:49:06
21 A I can see that. If I can beg the 13:49:08
22 indulgence of both counsel, I see two stacks in 13:49:12

1 front of me, and my partner, Rick, tells me that 13:49:17
2 the actual paper copies of the exhibits are in 13:49:20
3 there. I haven't seen these yet, but if it's 13:49:24
4 there and I can go off of this and assure you it's 13:49:27
5 the same document I'm looking at, I'd appreciate 13:49:30
6 it, because I'm still straining a little bit to 13:49:33
7 see this on the screen, which is a good 10, 13:49:36
8 12 feet away from me. 13:49:40

9 Q Yes, it would be the Bates stamp from what 13:49:41
10 we produced. So this first one would be 13:49:45
11 Bates-stamped ALH_00016659. Would that help you 13:49:48
12 with finding it in your stack? 13:49:54

13 MR. SCHWARTZ: Yeah, that should be fine. 13:49:58

14 A Sure. I've got it in front of me. Thank 13:50:01
15 you. 13:50:01

16 Q Okay. So if you want to just take a 13:50:04
17 minute and look through that, and I'll ask you 13:50:09
18 some questions. 13:50:12

19 MS. BREDEHOFT: Ben, it goes through 16662 13:50:21
20 if you want to be looking at your stack. 13:50:24

21 MR. CHEW: Okay. Got it. 13:50:29

22 BY MS. BREDEHOFT: 13:50:30

1 Q All right. Now, I'm going to turn your 13:50:31
2 attention to the e-mail at the bottom of the first 13:50:32
3 page, which is from Robin Shulman, to 13:50:35
4 Jessica Weitz, and, obviously, Amber, and I think 13:50:44
5 there might have been too much of a redaction on 13:50:46
6 this, dated December 6th, 2018. And it says, "See 13:50:47
7 the attached and let me know if there is anything 13:50:52
8 else you'd like to change before sharing with your 13:50:55
9 lawyers. Otherwise, feel free to go ahead and 13:51:00
10 pass it to them. 13:51:03

11 "There are two versions here -- one 13:51:04
12 showing the changes I made and one clean. Read 13:51:06
13 whichever is easier for you. Good luck on 13:51:10
14 Jimmy Fallon, and hope you're staying warm." 13:51:16

15 And that was on the 6th of December. And 13:51:16
16 then it goes from "AH assist," to "Jodi Gottlieb," 13:51:19
17 with a CC to "AH," on the 6th, and then it goes on 13:51:24
18 the 6th again from "AH." 13:51:29

19 Who do you understand the "AH" to be? 13:51:32

20 A Amber Heard. 13:51:35

21 Q Okay. And it's on December 6th, 2018, and 13:51:36
22 it's to you, to Jennifer Robinson, Jeffrey Berman, 13:51:40

1 forward, "Amber op-ed new." 13:51:45

2 Do you see that? 13:51:49

3 A I do. 13:51:49

4 Q Okay. And, then, it says, "Please see the 13:51:51

5 proposed op-ed that would run in conjunction with 13:51:53

6 my official announcement as the new Women's Rights 13:51:58

7 Ambassador for the ACLU. Please let me know what 13:52:02

8 you think." 13:52:02

9 Do you see that? 13:52:07

10 A I do. 13:52:07

11 Q Okay. Do you recognize this document? 13:52:08

12 A I do. This is what I received at or about 13:52:09

13 that time on December 6th, or, again, thereabouts. 13:52:11

14 Q Okay. And is this the first time that you 13:52:17

15 were -- that Amber Heard reached out to you in 13:52:21

16 connection with this op-ed? 13:52:24

17 MR. CHEW: Objection. Leading. 13:52:27

18 BY MS. BREDEHOFT: 13:52:29

19 Q Okay. When is the first time Amber Heard 13:52:29

20 reached out to you in connection with the op-ed in 13:52:31

21 reviewing the op-ed? 13:52:35

22 A Sure. So it was either with this e-mail, 13:52:37

1 or, verbally, at about this exact same or perhaps 13:52:43
2 another e-mail; but it was certainly within the 13:52:50
3 time frame of December 6th, 2018, as I can tell 13:52:52
4 you, based on this e-mail. 13:52:56

5 Q Okay. And could you tell me who 13:52:59
6 Jennifer Robinson is. 13:53:04

7 A Sure. Jennifer Robinson is an attorney 13:53:05
8 who is based in England. 13:53:09

9 Q All right. And could you tell me who 13:53:13
10 Jeffrey Berman is. 13:53:16

11 A Sure. Jeffrey Berman is an attorney in 13:53:16
12 California, who, at this point in time, was 13:53:21
13 working with my firm as an associate. 13:53:21

14 Q Okay. Thank you. 13:53:23

15 MS. BREDEHOFT: We can take this one down. 13:53:25
16 And, Alex, if you will take us to Exhibit No. 4, 13:53:27
17 please, and that's Bates stamp -- for everybody's 13:53:34
18 edification -- ALH_16423 through -28. 13:53:38

19 (Whereupon, the above-referenced document 13:53:38
20 was marked as Exhibit No. 4.) 13:53:49

21 THE WITNESS: Yes. 13:53:50

22 BY MS. BREDEHOFT: 13:54:02

1 Q Okay. Now, before I start asking you 13:54:03
2 questions about this particular document, I'm 13:54:05
3 going to ask you: In connection with the op-ed, 13:54:09
4 what, if anything, was your objective in 13:54:16
5 representing Amber Heard with respect to the 13:54:20
6 review and revision of the op-ed? 13:54:22

7 A I reviewed it and spent some significant 13:54:24
8 time on it to make sure there would be no 13:54:28
9 meritorious claim that could be brought against 13:54:32
10 her in connection with a defamation or related 13:54:37
11 type of tort claim, and, ideally, with that in 13:54:38
12 mind, to minimize the possibility of her ever 13:54:43
13 being sued in connection with publishing it. 13:54:46

14 Q All right. Now, I'm going to turn your 13:54:50
15 direction to Exhibit No. 4, and I'm going to ask 13:54:54
16 you to turn -- let's go down -- 13:54:57

17 MS. BREDEHOFT: I'm going to take control 13:55:01
18 again, Alex. 13:55:03

19 Q And -- and I'm going to go down. So we 13:55:05
20 can cover a couple of these pages. And if we 13:55:08
21 start here, which was on Exhibit 3, with her 13:55:21
22 asking you, "Please let me know what you think," 13:55:25

1 and then I'm going to scroll up so we follow the 13:55:28
2 next train of this. All right. And your first -- 13:55:31
3 this is your e-mail on December 6th, you say, 13:55:37
4 "Reads very well. Forwarding to Sean." 13:55:42
5 Do you see that? 13:55:47
6 A Yes. 13:55:48
7 Q Who is "Sean"? 13:55:48
8 A Sean Walsh is a colleague of mine and of 13:55:49
9 the firm's. He is not a lawyer. Sean is a 13:55:54
10 consultant who deals very often with media and 13:55:58
11 with state/federal agencies, and Sean is somebody 13:56:04
12 who is -- who has a, in my regard, a good working 13:56:09
13 knowledge of the media, and I wanted to get his 13:56:17
14 ten cents on this. 13:56:21
15 Q And he consults for your law firm? 13:56:23
16 A Actually, we have a non-law practice 13:56:26
17 entity, and it's called Wilson, Walsh, George, 13:56:30
18 Ross, and Sean is the "Walsh" of that entity. 13:56:36
19 Q Okay. Thank you. On December 7, the next 13:56:41
20 day, at 10:00 a.m., Amber -- "AH" is Amber Heard, 13:56:44
21 I think we've established that, correct? 13:56:49
22 A Yes. 13:56:52

1 Q Okay. And she said, "Just checking in to 13:56:52
2 see where we are. I need to get back to the ACLU 13:56:55
3 with my edits/thoughts. Please let me know." 13:57:00

4 What is your understanding of what Amber 13:57:05
5 was asking of you at that point? 13:57:08

6 MR. CHEW: Objection. Calls for 13:57:10
7 speculation. 13:57:11

8 BY MS. BREDEHOFT: 13:57:11

9 Q I'm just asking for your understanding. 13:57:11

10 A It is, truly, what I mentioned earlier, 13:57:14
11 which is that my involvement was to ensure that 13:57:17
12 there would be no meritorious legal claim that 13:57:21
13 could be brought against her arising out of the 13:57:27
14 publication of a piece; and, moreover, to minimize 13:57:29
15 the likelihood -- obviously, anybody can bring 13:57:35
16 suit for anything, but to minimize the likelihood 13:57:39
17 that somebody actually would bring suit. And we 13:57:43
18 did, in particular, have in mind Johnny Depp, and 13:57:46
19 -- go ahead. 13:57:50

20 Q I was going to say, why did you have in 13:57:51
21 mind Johnny Depp? 13:57:52

22 A There was an agreement between Johnny Depp 13:57:53

1 and Amber Heard to begin with and, in addition to 13:57:57
2 that, he's somebody I've regarded as highly 13:57:59
3 litigious, based on other lawsuits that he brought 13:58:07
4 then and in the recent past. 13:58:10

5 Q All right. And this e-mail from 13:58:12
6 Sean Walsh, to Amber, copies you, as well as 13:58:15
7 Jen Robinson and says, "I just reread through the 13:58:20
8 whole draft and content wise and grammar wise, I 13:58:24
9 think it's good. The only other thing I might 13:58:26
10 add/be aware of is that while Me Too picked up 13:58:29
11 steam in 2017/fully came to life then, the phrase 13:58:33
12 and its association with combating sexual assault 13:58:37
13 has been around since 2006. That kind of bolsters 13:58:41
14 the point that it took a long time and a turning 13:58:44
15 point for it to catch on with the broader public. 13:58:48

16 "You do us proud Amber. 13:58:48

17 "I'll grab Eric and make sure we are in on 13:58:53
18 the legal part." 13:58:57

19 Do you see that? 13:58:57

20 A I do. 13:58:58

21 Q Okay. So what, if any, role did 13:58:59
22 Sean Walsh have in the review of the op-ed? 13:59:00

1 A I think it was mostly in connection with 13:59:03
2 the optics of it and make sure it would be as 13:59:06
3 effective as possible, and I think he, in essence, 13:59:08
4 states that in the e-mail that you just read from. 13:59:11
5 Q Thank you. Now, we then go to an e-mail 13:59:16
6 from Jen Robinson, and I think you indicated that 13:59:19
7 she was UK counsel; is that correct? 13:59:22
8 A That is correct. 13:59:25
9 Q Okay. UK counsel for Amber Heard? 13:59:26
10 A Correct. 13:59:29
11 Q Okay. And it's copying you, same day, and 13:59:31
12 says, "I defer to Eric on the interpretation of 13:59:34
13 your agreement as a matter of U.S. law." 13:59:38
14 What was your understanding of what 13:59:41
15 Jen Robinson was saying or what she meant? 13:59:45
16 MR. CHEW: Objection. Hearsay. Calls for 13:59:48
17 speculation. 13:59:51
18 A My understanding was that, quite rightly, 13:59:51
19 with Jen Robinson not being a US lawyer, that any 13:59:57
20 issue that pertained to what I just mentioned 14:00:03
21 about, ensuring that there was no meritorious 14:00:09
22 basis for any legal claim, would be something that 14:00:09

1 everyone would look to me to ascertain, as opposed 14:00:13

2 to Jen, herself, being a UK lawyer. 14:00:18

3 Q Thank you. Now, on the next page it says, 14:00:22

4 "As we discussed in London, you have a really 14:00:26

5 powerful story to tell about what happened to you 14:00:29

6 as a result of speaking out. This is an important 14:00:31

7 story which is not about him; it's about societal 14:00:34

8 and industry responses. And that is a story that 14:00:38

9 is empowering for so many women: I can tell you 14:00:41

10 that I get contacted by women a lot wanting to 14:00:44

11 speak out about the abuse they have suffered, but 14:00:48

12 they face so many obstacles: wanting to be known 14:00:52

13 for what they do and not what was done to them; 14:00:56

14 the legal costs of defending themselves against 14:00:59

15 legal action; the publicity; what it means for 14:01:02

16 their careers, et cetera. It is also why it is so 14:01:05

17 important that we ensure that you are protected 14:01:08

18 and survive this, as an example of what's 14:01:11

19 possible, even in such a powerful industry. 14:01:14

20 That's why the Weinstein story was so big 14:01:16

21 globally - for what it said to women everywhere." 14:01:19

22 Do you see that? 14:01:22

1	MR. CHEW: Objection. You're just reading	14:01:23
2	documents into the record. I object on the basis	14:01:26
3	of hearsay. You're not even asking questions.	14:01:27
4	MS. BREDEHOFT: I'm about to.	14:01:27
5	MR. CHEW: You don't need to read	14:01:28
6	documents into the record to the witness and	14:01:30
7	thereby try to get them into evidence.	14:01:33
8	MS. BREDEHOFT: Are you done?	14:01:35
9	MR. CHEW: Yes. Objection. Hearsay.	14:01:36
10	MS. BREDEHOFT: Okay.	14:01:39
11	BY MS. BREDEHOFT:	14:01:40
12	Q Mr. George, did you discuss, at any point,	14:01:41
13	with Amber any of these issues addressed by Jen in	14:01:44
14	this e-mail?	14:01:49
15	A I believe we did discuss them.	14:01:50
16	MS. BREDEHOFT: Okay. We can take this	14:01:58
17	one down, Alex, and if you could bring up No. 5,	14:01:59
18	and that's going to be Bates stamp 16786	14:02:09
19	through -87.	14:02:16
20	(Whereupon, the above-referenced document	14:02:19
21	was marked as Exhibit No. 5.)	14:02:19
22	THE WITNESS: Got it.	14:02:24

1 BY MS. BREDEHOFT: 14:02:25

2 Q Okay. And I'm going to ask you -- it 14:02:28

3 starts out with the chain that we just talked 14:02:31

4 about with what Jen Robinson said, and then it 14:02:35

5 goes up and it has Amber, on December 7th, saying, 14:02:38

6 "Great. I'm happy with this. Do I have 14:02:47

7 everyone's approval to give back to the ACLU?" 14:02:47

8 Do you see that? 14:02:56

9 MR. CHEW: Objection. Hearsay. 14:02:57

10 A Yes. 14:02:58

11 Q Okay. And, then, Mr. Walsh responds, 14:02:59

12 "Give me five minutes to call Eric on one item." 14:03:02

13 A Yes. 14:03:02

14 Q What, if any, discussion do you recall 14:03:08

15 having with Sean Walsh about the article? And 14:03:10

16 this would be on December 7th, 2018. 14:03:14

17 A I don't have a specific recollection of 14:03:16

18 any conversation on that particular date. I have 14:03:18

19 general recollections that I did speak with 14:03:22

20 Sean Walsh and explained that the most important 14:03:27

21 consideration had to be the very one I mentioned 14:03:33

22 earlier, ensuring that there be no merit to any 14:03:37

1 claim that might otherwise be brought in 14:03:41

2 connection with this matter. 14:03:44

3 Q Okay. Then Amber sends an e-mail to Robin 14:03:48

4 Shulman and says, "Hey, I just wanted to check in 14:03:52

5 with you and touch base. It's being run by the 14:03:55

6 lawyers and should be done within the hour. 14:03:58

7 There's a big team, so it took longer than I would 14:04:00

8 have liked." 14:04:04

9 How large was your team of lawyers? 14:04:05

10 MR. CHEW: Objection to the form of the 14:04:09

11 question. Objection. Assumes facts not in 14:04:10

12 evidence. Hearsay. 14:04:13

13 MS. BREDEHOFT: I'm sorry, Ben. I wasn't 14:04:14

14 finished with my question. 14:04:16

15 MR. CHEW: Yeah, because you just keep 14:04:18

16 reading documents. 14:04:21

17 MS. BREDEHOFT: Debi, can you please read 14:04:52

18 back my question so I know where I was left off so 14:04:52

19 I can finish the question. 14:04:54

20 MR. CHEW: You were just reading the 14:04:54

21 document. 14:04:54

22 (Whereupon, the court reporter read the 14:04:54

1	previous question.)	14:04:54
2	MR. CHEW: Objection. Hearsay.	14:04:57
3	BY MS. BREDEHOFT:	14:04:57
4	Q Assisting -- excuse me. Assisting in the	14:04:58
5	review of the op-ed.	14:05:00
6	MR. CHEW: Objection. Hearsay.	14:05:00
7	A The team was myself and Jeff Berman and,	14:05:02
8	then, subject to what I discussed earlier about	14:05:06
9	her not being a U.S. lawyer, Jen Robinson.	14:05:11
10	Q Thank you.	14:05:18
11	MS. BREDEHOFT: Alex, you can take this	14:05:18
12	one down. Let's go to No. 6, and for everybody's	14:05:21
13	edification that is Bates-stamped Nos. 16814	14:05:24
14	through -21.	14:05:31
15	(Whereupon, the above-referenced document	14:05:43
16	was marked as Exhibit No. 6.)	14:05:55
17	MS. BREDEHOFT: Now, I'm going to take	14:05:55
18	control and I'm going to go --	14:05:57
19	BY MS. BREDEHOFT:	14:05:59
20	Q Do you have those Bates stamps in front of	14:05:59
21	you?	14:06:01
22	A I'm sorry. Would you mind just telling me	14:06:02

1 again, is it 6814 through 6821? 14:06:04

2 Q One-six- -- yes. Exactly. 14:06:08

3 A Got it. Yes, I do. 14:06:09

4 Q And if we can look at 16820, to start 14:06:11

5 with. 14:06:17

6 A Yes. 14:06:17

7 Q Two-one is blank, right? 14:06:19

8 A Yes. 14:06:22

9 Q So it really is starting there. All 14:06:22

10 right. And it starts with Jodi Gottlieb e-mailing 14:06:27

11 to Jessica, "We are so thrilled to hear that Amber 14:06:35

12 will be an official ambassador for the ACLU." 14:06:38

13 When did you learn about ambassador -- 14:06:45

14 Amber becoming an official ambassador for the 14:06:49

15 ACLU? 14:06:53

16 MR. CHEW: Objection. Leading. Lack of 14:06:54

17 foundation. 14:06:58

18 A I can't pinpoint the date. The best I can 14:06:58

19 do is tell you that it was around that time period 14:07:02

20 of one of the earlier exhibits that you had shown 14:07:05

21 me, in which I was directly CC'd or a direct 14:07:08

22 recipient to the e-mail. 14:07:12

1 Q Okay. Thank you. Now I'm going to go up 14:07:18
2 a little bit, and we have an e-mail from 14:07:20
3 Jessica Weitz, at the ACLU, and it's to 14:07:23
4 Jodi Gottlieb, with copies to a number of people 14:07:30
5 that appear -- I'm not going to comment on that. 14:07:33

6 But there's language in here that says, "I 14:07:36
7 would like to also introduce you to my colleagues 14:07:39
8 Ana and Gerry in media and editorial who will be 14:07:42
9 part of Amber's team here and be the bridge 14:07:45
10 between her and our women's rights project." 14:07:49

11 What, if any, knowledge did you have about 14:07:53
12 the ACLU having media and editorial support for 14:07:55
13 Amber in connection with her becoming an 14:08:00
14 ambassador? 14:08:03

15 MR. CHEW: Objection. Assumes facts not 14:08:04
16 in evidence. 14:08:07

17 A As I sit here today, I don't have a 14:08:09
18 specific recollection about that. 14:08:11

19 Q Okay. And then there's some discussion of 14:08:12
20 a title, and I'm going to take you up to the 14:08:17
21 e-mail here from Gerry Johnson at the ACLU. 14:08:21

22 Did you know who Gerry Johnson was at the 14:08:28

1	ACLU?	14:08:32
2	A No.	14:08:33
3	Q Okay. And this is an e-mail thread that's	14:08:34
4	part of this particular exhibit, and it goes down	14:08:37
5	and says, "In the op-ed, she can argue that it's	14:08:41
6	time to make sure that our leaders take GBV	14:08:45
7	seriously by highlighting the following:	14:08:50
8	Congress' delay in re-authorizing WV -- I mean,	14:08:55
9	VAWA, which expires 12/7; the ACLU's lawsuit	14:08:55
10	against Sessions over a new asylum rule he	14:09:04
11	implemented against asylum seekers fleeing	14:09:04
12	domestic violence; a new Title VII [sic] rule	14:09:04
13	we're expecting Betsy DeVos to issue this month,	14:09:04
14	which would roll back protections for sexual	14:09:19
15	assault survivors on college campuses.	14:09:23
16	"She can also, of course, mention Trump's	14:09:23
17	irresponsible attacks on Christine Blasey Ford and	14:09:23
18	survivors who don't report right away.	14:09:23
19	"If she feels comfortable, she can	14:09:33
20	interweave her personal story, saying how painful	14:09:34
21	it is, as a GBV survivor, to witness these	14:09:38
22	setbacks."	14:09:42

1 What, if any, understanding did you have 14:09:42
2 as to how many of the issues that were raised in 14:09:43
3 the op-ed were the initial idea of the ACLU? 14:09:46
4 MR. CHEW: Objection. Hearsay. Lack of 14:09:50
5 foundation. Assumes facts not in evidence. 14:09:54
6 Argumentative. 14:09:57
7 A I don't believe I had any such 14:09:58
8 understanding. 14:10:00
9 Q Did you know one way or the other? 14:10:01
10 A No. 14:10:04
11 Q Then I'm going to go up a few here, to 14:10:05
12 -15, if you have that in front of you. 14:10:30
13 A Yes. 14:10:34
14 Q Okay. And we're back to Gerry Johnson 14:10:35
15 again, and he says, "checking in to see whether 14:10:42
16 Amber would like to move forward with this plan. 14:10:46
17 If it would be most convenient for us to start the 14:10:50
18 draft, we're more than happy to. We just need to 14:10:54
19 know Amber's availability to jump on the phone so 14:10:57
20 we can quickly get her thoughts on a few of the 14:11:00
21 discussion topics in the op-ed." 14:11:03
22 And, again, at this point what, if any, 14:11:06

1 understanding did you have of the role of the ACLU 14:11:07

2 in this op-ed? 14:11:11

3 MR. CHEW: Objection. Assumes facts not 14:11:13

4 in evidence. Hearsay. 14:11:16

5 A I don't believe I had any such 14:11:17

6 understanding. 14:11:18

7 Q All right. And this is back in November, 14:11:21

8 and Jodi Gottlieb, on November 8th, said, "We will 14:11:22

9 get back to you soonest with feedback. Amber is 14:11:26

10 currently doing charity work in Mexico, but will 14:11:30

11 be back soon." 14:11:33

12 What, if any, understanding did you have 14:11:35

13 of Amber Heard's charity work back in that time 14:11:36

14 frame? 14:11:40

15 MR. CHEW: Objection. Argumentative. We 14:11:40

16 have a lot in the record about Amber's charitable 14:11:42

17 contributions or lack thereof. So I would object, 14:11:46

18 lack of foundation, argumentative, and leading. 14:11:50

19 A I don't know I had any such understanding. 14:11:52

20 Q Okay. Thank you. And then we go up to 14:11:56

21 the first page, and it's from Jessica Weitz at the 14:12:00

22 ACLU, to a number of people, and it said, "I will 14:12:04

1 be speaking with Amber tomorrow afternoon with our 14:12:09
2 op-ed writer, and get back to you-all with the 14:12:13
3 first draft for Amber's edits soon after." 14:12:16

4 Do you see that? 14:12:19

5 A I do. 14:12:20

6 Q And, again, what was your understanding of 14:12:20
7 whether the ACLU had an op-ed writer and would be 14:12:23
8 initiating the draft of Amber for the op-ed? 14:12:27

9 MR. CHEW: Objection. Argumentative and 14:12:32
10 assumes facts not in evidence. 14:12:34

11 A Again, I don't think I had any such 14:12:37
12 understanding. 14:12:39

13 MS. BREDEHOFT: Okay. Let's go to No. 7. 14:12:40

14 You know what? Never mind. I'm going to 14:12:43
15 skip No. 7. Let's go to No. 8, and that would be 14:12:45
16 Bates stamp 10657 through 10660, for everyone. 14:12:53

17 (Whereupon, the above-referenced document 14:13:06
18 was marked as Exhibit No. 8.) 14:13:06

19 THE WITNESS: Got it. 14:13:08

20 BY MS. BREDEHOFT: 14:13:10

21 Q All right. And, then, what I'm going to 14:13:13
22 do, this is November 29, 2018. I'm going to go 14:13:17

1 down to the bottom where it has a draft of the 14:13:21
2 op-ed. 14:13:31

3 A Yes. 14:13:36

4 Q And I'm going to take you -- I just wanted 14:13:37
5 to give you the context there. I'm going to take 14:13:41
6 you above that, and this is from Robin Shulman. 14:13:44

7 Did you ever speak with Robin Shulman? 14:13:52

8 A I don't believe I ever did. 14:13:55

9 Q Okay. What, if any, communications did 14:13:57
10 you have with the ACLU, in connection with your 14:13:59
11 representation of Amber Heard, in reviewing the 14:14:03
12 op-ed before publication? 14:14:09

13 A I am sorry to say this, but I'd need to 14:14:11
14 see specific e-mails to refresh my recollection 14:14:16
15 about whether there were any. 14:14:20

16 Q Do you have any recollection of being on 14:14:21
17 any telephone calls with the ACLU? 14:14:23

18 A I do not. 14:14:26

19 Q Okay. What, if any, influence would the 14:14:27
20 ACLU have had on your review and your 14:14:30
21 representation of Amber Heard in connection with 14:14:34
22 the op-ed? 14:14:35

1 MR. CHEW: Objection. Objection. 14:14:36

2 Hypothetical. Assumes facts not in evidence. 14:14:38

3 THE WITNESS: Sorry, Mr. Chew. I didn't 14:14:42

4 want to jump in on your objection. 14:14:44

5 A Absolutely none. 14:14:47

6 Q Why is that? 14:14:47

7 A Because I had one client at the time, 14:14:48

8 that's Amber Heard, and my representation and 14:14:56

9 knowledge and professionalism were all dedicated 14:15:00

10 to making sure that her best interests would be 14:15:04

11 protected. 14:15:07

12 Q So Robin Shulman says, on November 29th, 14:15:08

13 to Jessica Weitz, and it says, "Hi Amber. I'm 14:15:15

14 trying to gather your fire and rage and really 14:15:23

15 interesting analysis and shape that into op-ed 14:15:23

16 form with mentions of a few policies in a growing 14:15:26

17 movement. I hope it sounds true to you. It's 14:15:29

18 attached. I'm sorry for the delay in getting it 14:15:32

19 to you. Many lawyers have reviewed it here and 14:15:35

20 tweaked the policy bits. Your lawyer should 14:15:38

21 review this for the way I skirted around talk 14:15:41

22 about your marriage." 14:15:45

1 What, if any, knowledge, did you have 14:15:47
2 about lawyers from the ACLU having reviewed the 14:15:49
3 draft op-ed? 14:15:53

4 MR. CHEW: Objection. Hearsay. Leading. 14:15:55
5 Assumes facts not in evidence. 14:15:57

6 A None. 14:16:00

7 Q Okay. Now, the next one is Jessica Weitz, 14:16:09
8 again, on November 29th, to Amber, and says, 14:16:13
9 "Apologies for the delay but we have needed this 14:16:18
10 to pass through quite a few lawyers first." 14:16:20

11 Again, what, if any, knowledge did you 14:16:24
12 have that the lawyers from the ACLU had passed on 14:16:27
13 this before it was ever given to Amber and moved 14:16:33
14 on to you? 14:16:35

15 MR. CHEW: Objection. Hearsay. 14:16:36
16 Argumentative. Assumes facts not in evidence. 14:16:37

17 A None. 14:16:40

18 Q Okay. It also says, "You should show this 14:16:41
19 to your attorney, (one from the long list). I 14:16:44
20 want to make sure nothing was said in here that 14:16:48
21 puts you in jeopardy with your NDA." 14:16:51

22 Did you have an understanding of Amber 14:16:54

1	having an NDA?	14:16:57
2	MR. CHEW: Objection. Lack of foundation.	14:16:59
3	Assumes facts not in evidence.	14:17:00
4	A So Amber had -- let's put aside for a	14:17:03
5	moment whether you would properly call it an	14:17:08
6	"NDA," but Amber did have an agreement with	14:17:12
7	Mr. Depp that covered issues about	14:17:16
8	confidentiality. So if that's being referred to	14:17:17
9	with respect to "NDA," then, yes, I did have an	14:17:20
10	understanding.	14:17:24
11	Q Okay. Thank you.	14:17:24
12	MS. BREDEHOFT: Let's go now to -- Alex,	14:17:26
13	if you can take this one down, and bring up	14:17:29
14	Exhibit No. 9. And Exhibit No. 9 is -- Ben, for	14:17:32
15	your edification, it's the actual stipulated	14:17:45
16	Judgment of Dissolution of Marriage.	14:17:49
17	MR. CHEW: Right. And that's your	14:17:51
18	Exhibit 9?	14:17:54
19	MS. BREDEHOFT: Number 9.	14:17:54
20	MR. CHEW: Number 9 and our 11. Okay.	14:17:56
21	Thank you.	14:18:03
22	(Whereupon, the above-referenced document	14:18:03

1 was marked as Exhibit No. 9.) 14:18:03

2 BY MS. BREDEHOFT: 14:18:03

3 Q Okay. So Mr. George, I'm going to ask you 14:18:04

4 to take a look at Exhibit No. 9. 14:18:07

5 A Yes. 14:18:10

6 Q All right. And if want to take a minute 14:18:11

7 to go through it and familiarize yourself. 14:18:14

8 A I've seen it before. It's okay. 14:18:17

9 Q Are you familiar with this document? 14:18:20

10 A I am. 14:18:22

11 Q Please describe what it is. 14:18:23

12 A As it's titled, it's a Judgment of 14:18:24

13 Dissolution of Marriage, between Amber Heard and 14:18:32

14 Mr. Depp. 14:18:33

15 Q Were you familiar with this document and 14:18:34

16 its contents when you represented Amber Heard 14:18:37

17 relating to the review of the op-ed? 14:18:40

18 A Yes. 14:18:42

19 Q And what was your objective in 14:18:43

20 representing and advising Amber Heard on the 14:18:46

21 op-ed, in connection with this stipulated Judgment 14:18:49

22 of Dissolution of Marriage? 14:18:54

1 MR. CHEW: Objection. Asked and answered. 14:18:54

2 A So my objective was to make sure that 14:18:55

3 there could be no meritorious claim that could be 14:18:59

4 brought against Ms. Heard in connection with the 14:19:03

5 publication of the op-ed, whether that is a tort 14:19:05

6 related to, say, defamation, or something akin to 14:19:09

7 it, but also including any contract-based breach 14:19:14

8 claim arising in connection with the judgment. 14:19:19

9 Q Thank you. I'm going to now take this 14:19:24

10 down to what is page 41 of the stipulated 14:19:27

11 judgment -- there we go. We highlighted it to 14:19:39

12 make it a little bit easier. 14:19:44

13 And I'm going to direct your attention, 14:19:51

14 Mr. George, to paragraph 20, "Confidentiality." 14:19:53

15 A Yes. 14:20:00

16 Q And it has 20.1 here first, "Except for 14:20:00

17 documents previously filed with the court, neither 14:20:08

18 Petitioner nor Respondent shall discuss, publish 14:20:10

19 or post or cause to be discussed, published or 14:20:14

20 posted, directly or indirectly, any information 14:20:17

21 pertaining to the parties' premarital 14:20:21

22 relationship, marriage, or this disillusion action 14:20:23

1 on the Internet (including, but not limited to, 14:20:25
2 social media applications, websites, blogs, news 14:20:29
3 periodicals, et cetera), or in the media in any 14:20:34
4 manner. Petitioner and Respondent shall also 14:20:37
5 instruct their respective agents, friends, family 14:20:37
6 members, and representatives not to communicate 14:20:43
7 and/or act in any way contrary to this provision." 14:20:45

8 Do you see that? 14:20:51

9 A I do. 14:20:51

10 Q And what is your understanding of how that 14:20:52
11 would impact Amber Heard with respect to the 14:20:54
12 op-ed? 14:20:56

13 A That it would be -- I'm sorry, Mr. Chew. 14:20:57
14 Please, go ahead. 14:21:00

15 MR. CHEW: No, I withdraw the objection. 14:21:00

16 THE WITNESS: I hate it when lawyers step 14:21:02
17 on the witness's answers. I'm really going to try 14:21:05
18 not do that to you, Mr. Chew. 14:21:09

19 A My objective was to ensure that any op-ed 14:21:12
20 would not run afoul of these limitations. 14:21:16

21 Q All right. Thank you. And then I'm going 14:21:23
22 to ask you to go down to 20.3. It says, "Each of 14:21:24

1 the parties hereto acknowledges, agrees, warrants, 14:21:33
2 represents and covenants that, except as may be 14:21:34
3 required by law, each said party shall refrain 14:21:37
4 from making or causing to be made, and agrees not 14:21:41
5 to make or cause to be made, any derogatory, 14:21:47
6 disparaging, critical or accusatory statements, 14:21:49
7 either directly or indirectly, express or implied, 14:21:52
8 oral or written, concerning the other party, 14:21:57
9 whether said statements are believed to be true or 14:21:59
10 not." 14:22:02

11 Do you see that there? 14:22:03

12 A I do. 14:22:04

13 Q What, if any, role did this paragraph, 14:22:04

14 20.3, in the stipulated Judgment of Dissolution of 14:22:08

15 Marriage, play in your legal advice to Amber Heard 14:22:14

16 in connection with the op-ed? 14:22:17

17 A Again, it was my objective to make sure 14:22:19

18 that this limitation, too, was not, in any way, 14:22:26

19 breached by anything that Ms. Heard would publish. 14:22:33

20 Q All right. I'm going to -- 14:22:41

21 MS. BREDEHOFT: Alex, can you take that 14:22:46

22 down now, and I'm going to ask you to pull up 14:22:48

1 No. 10, and this is a text message series, it's 14:22:51
2 ALH_16027 to 16032. 14:22:57

3 (Whereupon, the above-referenced document 14:23:24
4 was marked as Exhibit No. 10.) 14:23:26

5 BY MS. BREDEHOFT: 14:23:26

6 Q Mr. George, I'm going to ask you: Do you 14:23:26
7 have that in front of you? 14:23:28

8 A I do, yes. Maybe you can just walk me 14:23:30
9 through -- okay. I got it. I was trying to 14:23:34
10 figure out which column was authored by who, but I 14:23:36
11 got it. 14:23:40

12 Q Okay. I'm going to direct your attention 14:23:42
13 down to what is the Bates stamp 29 on the bottom, 14:23:53
14 this one right here. 14:23:58

15 A Yes. 14:24:00

16 Q And this is "AH," from Amber Heard; you 14:24:01
17 see that, right? 14:24:06

18 A I do. 14:24:07

19 Q Okay. She says, "Hey, Eric, thanks so 14:24:08
20 much for getting back." I think part of the 14:24:11
21 little end here us cut off. "...getting back to me 14:24:15
22 on this. I just worry I lose a little bit of my 14:24:18

1 original voice and the editorial," t-e-a 14:24:20
2 something, "of the ACLU feels the same way. Just
3 in couple of places. I'm wondering if I can send
4 you what they came back with, considering our
5 edits. Do you have a second? Would you give it a
6 read? I'm only in the airport where I have
7 connection or access to my phone for another hour
8 and a half. I'm currently in transit on a layover
9 in Hong Kong heading to LA."

10 Do you see that? 14:24:56

11 A I do. 14:24:56

12 Q Okay. And you responded to this at 14:24:57
13 10:05 p.m., correct, on that same date? 14:24:58

14 A I see that, yes. 14:24:59

15 Q Okay. And you said, "Of course, send 14:25:00
16 away. Here's the most important point - we can 14:25:03
17 accommodate both interests - your original voice 14:25:08
18 and not jeopardizing a contract breach claim." 14:25:09

19 What did you mean by that? 14:25:13

20 A To make sure that she could write 14:25:15
21 something that reflected her true voice, but also 14:25:17
22 it wouldn't run afoul of any of the limitations 14:25:20

1 set forth in the divorce judgment that we just 14:25:26

2 looked at. 14:25:29

3 Q Thank you. Then Amber responds, "Exactly 14:25:30

4 my goal. Thank you so much for being so helpful 14:25:30

5 on this. I just e-mailed you. Let me know what 14:25:30

6 you think." 14:25:42

7 And then you responded back, "Think we've 14:25:42

8 got a solution - have a look at the e-mail I just 14:25:46

9 sent. We shouldn't have to compromise on this one 14:25:47

10 to achieve the right message and not put you at 14:25:50

11 risk." 14:25:53

12 And this was about an hour later, would 14:25:54

13 you agree? 14:25:56

14 MR. CHEW: Objection. Hearsay. You're 14:25:56

15 constantly reading in documents. So I would 14:25:58

16 object on the grounds of hearsay and assuming 14:26:01

17 facts not in evidence. 14:26:03

18 A So just to make sure I'm following, yes -- 14:26:05

19 Q Let me ask a clean question. 14:26:10

20 A Sure. 14:26:12

21 Q What did you mean by, "We shouldn't have 14:26:13

22 to compromise on this one to achieve the right 14:26:13

1 message and not put you at risk"? 14:26:23

2 A That I didn't see any conflict between her 14:26:23

3 being able to speak in her original voice, and her 14:26:27

4 desire to make sure that she wouldn't be 14:26:30

5 subjecting herself to any suit, and that's where 14:26:32

6 I'm saying we shouldn't have to compromise. 14:26:35

7 Q Okay. And the time between the first 14:26:40

8 e-mail that you sent at 10:06, and the time on 14:26:43

9 this e-mail is 11:00. What, if anything, do you 14:26:48

10 recall doing between 10:06 and 11:00, in 14:26:54

11 connection with Amber Heard and the op-ed? 14:26:58

12 A Let me just go through -- hang on just one 14:27:01

13 moment, if you would. 14:27:11

14 So I'm going to say, again, to the best of 14:27:19

15 my recollection, that that would have been the 14:27:23

16 time for me to receive the, as she puts it, quote, 14:27:24

17 "What they came back" -- I'm assuming that the 14:27:42

18 next word is with -- "considering our edits." To 14:27:47

19 review and analyze that and then get back to her 14:27:48

20 with my views about that last draft of the op-ed. 14:27:52

21 Q Okay. Thank you. And while we're on this 14:27:59

22 text message chain, I'm just going to ask you to 14:28:02

1 scroll down to the next page. And it says -- 14:28:06

2 Amber says to you, "Also, are you in town? If so, 14:28:09

3 would you like to come to the Aquaman premier in 14:28:13

4 LA tomorrow? I can get you a plus one." And you 14:28:19

5 said you had other plans at that time. 14:28:21

6 What, if any, understanding did you have 14:28:24

7 of whether the Aquaman premier had any 14:28:27

8 relationship to the op-ed being published at that 14:28:31

9 time? 14:28:35

10 A None. 14:28:35

11 MS. BREDEHOFT: Alex, you can take that 14:28:38

12 down, and if we can go to Exhibit No. 11, and 14:28:41

13 that's Bates stamp Nos. 16663 and -664. 14:28:51

14 (Whereupon, the above-referenced document 14:29:00

15 was marked as Exhibit No. 11.) 14:29:17

16 THE WITNESS: Got it. 14:29:17

17 BY MS. BREDEHOFT: 14:29:19

18 Q Now, this one we're kind of hopping back 14:29:19

19 just a touch to December 6th and December 7th, but 14:29:22

20 there's different e-mail chains, I'll represent to 14:29:26

21 you, and so I'm trying to capture these things in 14:29:29

22 different places. So let me just ask. 14:29:32

1 So I'm going to direct your attention on 14:29:33
2 this first page, it's the same e-mail that we 14:29:36
3 looked at quite some time ago, at the very 14:29:41
4 beginning of this deposition, that had the 14:29:44
5 December 6th, asking you to take a look at this. 14:29:46

6 A Yes. 14:29:51

7 Q Okay. And then the reason that I'm going 14:29:51
8 here is, it says -- Amber asks you, "Thanks. Let 14:29:56
9 me know if I am putting myself in any compromising 14:30:02
10 positions. Thanks." 14:30:03

11 What was your understanding of what Amber 14:30:06
12 was asking of you with that? 14:30:09

13 MR. CHEW: Objection. Calls for 14:30:12
14 speculation. 14:30:14

15 BY MS. BREDEHOFT: 14:30:14

16 Q I'm just asking what your understanding 14:30:14
17 is. 14:30:16

18 A Sure. My understanding is that that's 14:30:16
19 exactly the same objective that I described 14:30:20
20 earlier, to ensure that she be able to express 14:30:24
21 herself authentically and also not run any risk of 14:30:29
22 publishing something that could get her sued in a 14:30:35

1 meritorious suit. 14:30:43

2 Q And what, if any, indications did you have 14:30:43

3 from Amber Heard during that time frame that Amber 14:30:46

4 did not intend to follow your advice or did not 14:30:49

5 care if she was in a compromising position or 14:30:54

6 might be at legal risk? 14:30:58

7 MR. CHEW: Objection. Vague, ambiguous, 14:30:59

8 clearly calls for speculation as to what was in 14:31:02

9 Amber's mind. 14:31:06

10 A So let me answer that this way, really, 14:31:07

11 two points: Number one, there was never anything 14:31:11

12 that she said to me to the effect that she was 14:31:16

13 willing to run some risk of being sued or that she 14:31:21

14 wouldn't listen to any counsel or anything of the 14:31:25

15 that sort; number two, that she, affirmatively, 14:31:29

16 did follow, in all instances, my counsel with 14:31:36

17 respect to these particular edits. 14:31:40

18 MS. BREDEHOFT: Thank you. All right. We 14:31:45

19 can take down No. 11, Alex, and let's bring up 14:31:47

20 No. 12 and that is Bates-stamped 16285 to -87. 14:31:51

21 (Whereupon, the above-referenced document 14:32:02

22 was marked as Exhibit No. 12.) 14:32:04

1 BY MS. BREDEHOFT: 14:32:04

2 Q Now, we'll start with the first page on 14:32:13

3 this one, and this is on 12/8, from Sean Walsh, to 14:32:16

4 Amber, and AH Assist, and you, and J. Robinson, 14:32:21

5 and CC back to Sean Walsh. 14:32:27

6 Do you see that? 14:32:27

7 A I do. 14:32:31

8 Q And it has, "Legal edits for ACLU op-ed." 14:32:31

9 And then has, "ACLU revised draft of EG and JR 14:32:36

10 edits." 14:32:42

11 What was your understanding of what "EG," 14:32:43

12 and "JR," stood for? 14:32:47

13 A "EG," is myself, Eric George, and "JR," is 14:32:47

14 the initials of Jen Robinson. 14:32:50

15 Q Okay. Now, I'm going to take you down to 14:32:53

16 the next page here, where there is a draft, and it 14:32:56

17 has some parts crossed out, and then there's also 14:33:00

18 come capitalization and some more crossed out. 14:33:09

19 Are you able to recall what portions of 14:33:13

20 this were Sean Walsh's edits, Jen Robinson's, or 14:33:18

21 yours on this particular draft? 14:33:29

22 MR. CHEW: Objection. Lack of foundation, 14:33:30

1 assumes facts not in evidence. 14:33:31

2 A I certainly recollect that I did make 14:33:33

3 edits. I can't swear which ones that I made. My 14:33:35

4 best recollection here is that when we go to the 14:33:42

5 third paragraph down, "In any event, far more 14:33:47

6 revealing is," in all caps, that sounds an awful 14:33:51

7 lot like me. And the subsequent edit striking, 14:33:58

8 "...within any marriage, any way," as well as the 14:34:05

9 prior entire paragraph that was stricken, are very 14:34:11

10 much in line with the analysis and advice that I 14:34:16

11 was bringing to this. And I'd say the same thing 14:34:22

12 about what's in the very last paragraph. 14:34:25

13 So it is possible that all these edits are 14:34:28

14 mine, but I can't tell you with certainty at this 14:34:32

15 point, absent some kind of metadata or, you know, 14:34:35

16 a version of this has colored strikeouts or that 14:34:38

17 sort of thing. 14:34:43

18 Q Okay. Thank you. 14:34:45

19 MS. BREDEHOFT: We can take that one down 14:34:50

20 and if we can put up Exhibit No. 13. 14:34:52

21 (Whereupon, the above-referenced document 14:34:52

22 was marked as Exhibit No. 13.) 14:35:03

1 MS. BREDEHOFT: And that's Bates stamp 14:35:03
2 Nos. 16561 and -62. 14:35:08
3 BY MS. BREDEHOFT: 14:35:16
4 Q Take a look at Exhibit No. 13, it's from 14:35:18
5 Amber Heard, on 12/8, to you, Sean Walsh, 14:35:22
6 Jennifer Robinson. Subject: "One thought? ACLU 14:35:28
7 statement." And Amber says here, "I received your 14:35:34
8 redline version. I think the edits make perfect 14:35:36
9 sense. I had one thought, however, in the 14:35:41
10 attached statement I highlighted the one part that 14:35:43
11 I'm curious to see if there's perhaps another 14:35:49
12 version of it we could keep in there. Maybe 14:35:50
13 instead of, 'two years ago I sought a temporary 14:35:50
14 restraining order from my then-husband,' we could 14:35:58
15 do something like, 'two years ago after 14:36:00
16 successfully acquiring a temporary restraining 14:36:00
17 order,' would it be okay then? Or some version of 14:36:07
18 that? 14:36:07
19 "I just like the acknowledgement that 14:36:07
20 follows after, '...only to feel the full force of 14:36:07
21 the culture's wrath for women who speak out.' I'd 14:36:19
22 had to lose that." 14:36:20

1 Now, if we go down to the section that 14:36:21
2 she's referring to there, what, if any, concerns 14:36:24
3 did you have about that section? 14:36:26

4 MR. CHEW: Objection. Argumentative. 14:36:28
5 Hearsay. Lack of foundation. 14:36:31

6 A So I can recollect, clearly, that I wanted 14:36:33
7 to go above and beyond what was limited by the 14:36:41
8 dissolution of marriage judgment and make sure 14:36:48
9 that there was no part in this op-ed that 14:36:52
10 reasonably could be seen as involving Amber 14:36:57
11 speaking about the marriage. 14:37:02

12 So my edits were made with that objective 14:37:05
13 in mind. 14:37:10

14 MS. BREDEHOFT: Thank you. All right. We 14:37:14
15 can take this one down, and let's go to 14. 14:37:15
16 That's Bates stamp 16795 and -96. 14:37:17

17 (Whereupon, the above-referenced document 14:37:23
18 was marked as Exhibit No. 14.) 14:37:35

19 BY MS. BREDEHOFT: 14:37:35

20 Q So this one is a continuation on one of 14:37:36
21 the threads, and I'm going to just show you that 14:37:40
22 it starts with what I just read from the other one 14:37:42

1 from the e-mail from Amber. And Sean Walsh says, 14:37:46
2 "Seems reasonable to me, but defer to Eric." 14:37:51
3 And then Amber asks your thoughts, and you 14:37:54
4 respond, "You did a great job on this. I see no 14:37:58
5 reason why we can't leave in your elegant language 14:38:02
6 while still eliminating reference to court 14:38:05
7 proceedings." 14:38:05
8 And then you're asking, "What's your ETA? 14:38:10
9 Can I tinker with it and get back to you tomorrow 14:38:18
10 evening?" 14:38:18
11 A Yes. 14:38:20
12 MR. CHEW: Objection. Hearsay. Reading 14:38:20
13 documents into the record. 14:38:21
14 BY MS. BREDEHOFT: 14:38:23
15 Q What did you -- 14:38:24
16 MS. BREDEHOFT: I'm sorry? 14:38:25
17 MR. CHEW: These aren't even questions, 14:38:26
18 you're just reading documents into the record. 14:38:28
19 MS. BREDEHOFT: Are you finished with your 14:38:31
20 objection? 14:38:33
21 MR. CHEW: Yes. Objection. Hearsay. 14:38:33
22 Lack of foundation. Assumes facts not in 14:38:35

1	evidence.	14:38:38
2	MS. BREDEHOFT: Are you finished?	14:38:38
3	MR. CHEW: Argumentative.	14:38:41
4	BY MS. BREDEHOFT:	14:38:45
5	Q What did you mean by this, Mr. George?	14:38:45
6	MR. CHEW: Objection. Vague and	14:38:48
7	ambiguous. Compound.	14:38:53
8	A So what I meant, at that point in time,	14:38:55
9	was, again, that she ought to be able to, without	14:38:57
10	compromising either interest, both leave in her	14:39:02
11	authentic voice, and eliminate any risk of a	14:39:06
12	meritorious suit being brought against her in	14:39:12
13	regard to the op-ed.	14:39:16
14	Q Thank you. And then there's a little more	14:39:19
15	discussion about, she says, "We would need to	14:39:22
16	submit it on Monday."	14:39:26
17	What, if any, understanding did you have	14:39:28
18	about what Amber meant about where they would be	14:39:31
19	submitting it on Monday?	14:39:33
20	MR. CHEW: Objection. Vague and	14:39:35
21	ambiguous.	14:39:38
22	THE WITNESS: Sorry, Counsel.	14:39:38

1 A As I sit here today, I don't have any 14:39:40
2 recollection, and I may well not have known back 14:39:42
3 then. 14:39:46

4 MS. BREDEHOFT: Okay. Thank you. Let's 14:39:48
5 take down 14, we can go to 15. And this is 14:39:49
6 Bates-stamped 16289, just for everybody. 14:40:07

7 (Whereupon, the above-referenced document 14:40:12
8 was marked as Exhibit No. 15.) 14:40:14

9 BY MS. BREDEHOFT: 14:40:14

10 Q I'm going to ask you to take a look at 14:40:17
11 Exhibit No. 15, if we go to the bottom, it's from 14:40:21
12 you, to Amber, on December 10th. It says, "I 14:40:26
13 think this reads well, and completely avoids any 14:40:30
14 areas that could come into conflict with the 14:40:30
15 judgment. Let me know your thoughts. Proud of 14:40:38
16 you for writing this." 14:40:39

17 What, if anything, did you mean by, 14:40:41
18 "...completely avoids any areas that could come 14:40:43
19 into conflict with the judgment"? 14:40:46

20 MR. CHEW: Objection. Lack of foundation. 14:40:48

21 A So again, it was important -- it was vital 14:40:49
22 that she be able to write in her authentic voice 14:40:53

1 and do so without running any risk that a 14:40:59

2 meritorious suit could be brought against her. 14:41:03

3 Q Okay. And, then, at the top, you have an 14:41:08

4 e-mail on the 11th, saying, "Team, we are on an 14:41:11

5 urgent deadline and something I sent Amber at 14:41:17

6 5:20 p.m. now cannot be retrieved. Sean was able 14:41:21

7 to access when sent. Now, it's totally corrupted. 14:41:26

8 A special prize to anyone who can retrieve an 14:41:29

9 intelligible version of what I originally sent 14:41:29

10 Amber and promptly resend to Amber." 14:41:38

11 Do you recall what happened on that 14:41:39

12 occasion? 14:41:42

13 MR. CHEW: Objection. Lack of foundation. 14:41:43

14 Hearsay. Assumes facts not in evidence. 14:41:44

15 A Yeah. You brought back a bad memory. And 14:41:47

16 I see here that I added two people, Martin Zuniga, 14:41:51

17 who was in charge of IT, and Lydia Tavera, who 14:41:51

18 manages the firm, and there was, obviously, some 14:42:02

19 IT-type problem, as I've referenced here, that I 14:42:05

20 had e-mailed something that now couldn't be 14:42:12

21 retrieved. 14:42:16

22 MS. BREDEHOFT: Okay. We can take this 14:42:19

1 down. If we can bring up No. 17, please. This is 14:42:21

2 Bates stamp 16281 to 16284. 14:42:38

3 (Whereupon, the above-referenced document 14:42:38

4 was marked as Exhibit No. 17.) 14:42:45

5 BY MS. BREDEHOFT: 14:42:45

6 Q Okay. I'm going to ask you to take a look 14:42:56

7 at what has been marked as Deposition Exhibit 14:42:58

8 No. 17, and it's -- if we can -- it looks -- this 14:43:03

9 is from Lydia Tavera, you just told us who she is 14:43:11

10 and then you respond to Amber saying, "Lydia found 14:43:13

11 it. Here it is." 14:43:18

12 Is this consistent with what you just 14:43:20

13 recalled, that there was a search for it and Lydia 14:43:23

14 ended up finding it? 14:43:25

15 MR. CHEW: Objection. Lack of foundation. 14:43:27

16 Argumentative. 14:43:29

17 A Yes. I think it is. It looks like this 14:43:44

18 was sent 33 minutes after my all caps request from 14:43:49

19 your Exhibit 15, and -- 14:43:56

20 Q Right. 14:44:00

21 A And I see an attachment here that has some 14:44:00

22 edits. I'm happy to go through the edits if you'd 14:44:04

1 like, but this does look like the response to what 14:44:10

2 I asked for. 14:44:13

3 Q Okay. I'm scrolling down now, Mr. George, 14:44:15

4 and is this what you are referring to with the 14:44:18

5 attachment that had these edits? 14:44:21

6 A Yes. 14:44:24

7 Q And what is your understanding of whose 14:44:24

8 edits these were on the attachment? 14:44:29

9 A Mine. 14:44:50

10 Q Okay. Thank you. 14:44:52

11 MS. BREDEHOFT: All right. Now, let's go 14:44:58

12 to Exhibit No. 18 -- wait, wait, wait. Before we 14:45:00

13 go to 18, I'm sorry. Let's go to Exhibit No. -- 14:45:11

14 no, we're fine. Let's go to Exhibit No. 18. My 14:45:16

15 apologies. And that's Bates-stamped 16288. 14:45:21

16 (Whereupon, the above-referenced document 14:45:27

17 was marked as Exhibit No. 18.) 14:45:28

18 BY MS. BREDEHOFT: 14:45:28

19 Q Mr. George, I'm going to ask you what has 14:45:36

20 been marked as Exhibit No. 18, and this is on 14:45:38

21 12/11, and says, "A," that's Amber, I assume, 14:45:42

22 correct? 14:45:52

1 A Yes. 14:45:52

2 Q "I think this reads well and completely 14:45:54

3 avoids any areas that could come into conflict 14:45:57

4 with the judgment." 14:46:01

5 What, if anything, did you mean by that? 14:46:02

6 A Again, to make sure that there would no 14:46:04

7 possibility that no meritorious claim could be 14:46:06

8 brought against Amber for publishing the op-ed. 14:46:09

9 Q Okay. Thank you. 14:46:13

10 MR. CHEW: Excuse me, Elaine, what exhibit 14:46:14

11 number was that? 14:46:18

12 MS. BREDEHOFT: That's Exhibit No. 18. 14:46:18

13 MR. CHEW: Thank you. 14:46:20

14 BY MS. BREDEHOFT: 14:46:20

15 Q All right. Now I'm going to ask you to 14:46:27

16 take a look at Exhibit No. 19, and that's Bates 14:46:29

17 stamp 10724 to 10727. 14:46:38

18 (Whereupon, the above-referenced document 14:46:46

19 was marked as Exhibit No. 19.) 14:46:48

20 BY MS. BREDEHOFT: 14:46:48

21 Q Now, just so we can get the context, I 14:47:05

22 think we need to go down a few pages. And we have 14:47:08

1 Amber sending this on December 11, 2018, "Subject: 14:47:12
2 Approved letter," and she's sending it to 14:47:26
3 Jessica Weitz and Robin Shulman at the ACLU, 14:47:32
4 "Please let me know if you have any thoughts or 14:47:36
5 anything that you want to tweak or add." 14:47:37
6 And I won't ask you to do a comparison 14:47:40
7 between this and the last one that we just looked 14:47:44
8 at with the redlines, because the jury can do that 14:47:47
9 all by themselves, but then I'm going to scroll up 14:47:50
10 here and I'm going to show you where the e-mail 14:47:54
11 came back from Robin Shulman, on December 12th, to 14:47:58
12 Amber. 14:48:02
13 And it says, "Hi Amber, is there any room 14:48:04
14 at all to rejigger the sentence we had before. I 14:48:04
15 signed an agreement not to talk about my marriage, 14:48:13
16 and I will not do that here. What happened to me 14:48:15
17 publicly is more interesting and revealing than 14:48:18
18 what happened within my marriage, anyway - because 14:48:21
19 it shows how institutions protect men accused of 14:48:23
20 abuse." 14:48:23
21 And, then, Ms. Shulman points out, "It now 14:48:28
22 reads: When I began to give voice to the 14:48:34

1 observations and opinions I had for too long kept 14:48:37

2 locked within, the reaction was instantaneous." 14:48:40

3 Then Ms. Shulman says, "I see what the 14:48:43

4 lawyers are trying to do, but don't think it quite 14:48:44

5 makes sense with what comes after that. None of 14:48:46

6 the fallout happened because you gave voice to 14:48:51

7 observations and opinions, and making it so 14:48:54

8 oblique kind of detracts from the incredibly 14:49:01

9 powerful point that you are in the rare position 14:49:01

10 of witnessing, from the eye of the storm, exactly 14:49:03

11 how institutions cover up for perpetrators (or we 14:49:03

12 could even hedge more and cast it as people 14:49:03

13 accused of perpetrating abuse). Is there room to 14:49:11

14 maneuver a bit?" 14:49:15

15 Now Amber then sends this to you and says, 14:49:15

16 "Please see below from editorial team with ACLU. 14:49:19

17 I agree completely and feel it's missing without 14:49:23

18 having the below originally included in the 14:49:26

19 initial draft, but let me know if I can go ahead 14:49:28

20 and give her the go ahead to try to rework it a 14:49:32

21 tiny bit. I don't anticipate it being a problem 14:49:38

22 considering she is working from the elegant and 14:49:39

1	fine-tuned draft you guys approved yesterday."	14:49:39
2	Do you see that?	14:49:39
3	A I do. I see that.	14:49:45
4	MR. CHEW: Wait. Wait.	14:49:45
5	THE WITNESS: Counsel, my apologies.	14:49:47
6	MR. CHEW: No, it is not your fault.	14:49:49
7	She is reading documents. It makes no	14:49:51
8	sense. It is hearsay. Lack of foundation.	14:49:54
9	Assumes facts not in evidence. Argumentative.	14:49:57
10	Vague and ambiguous, and compound. She is just	14:50:02
11	reading documents.	14:50:07
12	MS. BREDEHOFT: Are you finished, so I can	14:50:10
13	ask my question?	14:50:12
14	MR. CHEW: You said -- I finished the	14:50:13
15	objections.	14:50:16
16	MS. BREDEHOFT: Okay.	14:50:17
17	BY MS. BREDEHOFT:	14:50:17
18	Q Where it says, "I signed an agreement not	14:50:18
19	to talk about my marriage and I will not do that	14:50:21
20	here," what, if any, concern did you have with	14:50:25
21	that language?	14:50:28
22	MR. CHEW: Objection. Lack of foundation.	14:50:28

1 Argumentative. 14:50:30

2 A I wanted to make sure that she was not 14:50:31

3 going to run afoul, at all, of any limitations 14:50:36

4 that were in the judgment of the dissolution of 14:50:40

5 marriage. 14:50:40

6 MS. BREDEHOFT: Alex, can we take this one 14:50:48

7 down and then pull up No. 21, and that's Bates 14:50:51

8 stamp Nos. 16391 to -94. 14:50:56

9 (Whereupon, the above-referenced document 14:51:03

10 was marked as Exhibit No. 21.) 14:51:04

11 BY MS. BREDEHOFT: 14:51:04

12 Q Mr. George, I'm going to ask you to take a 14:51:14

13 look at Exhibit No. 21, from -- and this has some 14:51:16

14 of the chain we just looked at on the last 14:51:24

15 exhibit. And then it has a response from you. 14:51:29

16 Do you see that on 12/12? 14:51:39

17 A Yes, I do. 14:51:41

18 Q And you say, "Hi A, just tried to call 14:51:42

19 you. I'm e-mailing only you and Sean at this 14:51:45

20 time. Here's the challenge: The confidentiality 14:51:49

21 agreement in the divorce judgment is as broad as 14:51:50

22 it gets. We have to live with it." 14:51:53

1 What did you mean by that? 14:51:56

2 A So what I meant by that was that it was 14:51:57
3 imperative that, in publishing an op-ed, she not 14:52:03
4 run afoul of the Judgment of Dissolution of 14:52:07
5 Marriage, and in that Judgment of Dissolution of 14:52:10
6 Marriage, was a very broad confidentiality 14:52:13
7 provision so that, therefore, with respect to 14:52:16
8 whatever it was that she was going to be 14:52:19
9 publishing, she couldn't run afoul of it, and 14:52:21
10 that's what my edits were designed to achieve. 14:52:25

11 Q And you go on, "The ACLU folks are surely 14:52:30
12 well-intentioned, but they don't understand how 14:52:37
13 broad it is. It, literally, prevents you from 14:52:37
14 writing or discussing any information about your 14:52:40
15 marriage or divorce. That's why I wrote the edits 14:52:43
16 the way I did. There is no way that I am letting 14:52:46
17 you expose yourself to the inevitable claim of 14:52:48
18 breach the other side's lawyers would make were 14:52:53
19 the article to state, 'I signed an agreement not 14:52:56
20 to talk about my marriage and I will not do that 14:52:59
21 here. What happened to me publicly is more 14:53:01
22 interesting and revealing than what happened 14:53:04

1 within my marriage anyway - because it shows how 14:53:06
2 institutions protect men accused of abuse.'" 14:53:09
3 What did you mean by this? 14:53:13
4 MR. CHEW: Objection. Lack of foundation. 14:53:14
5 Hearsay. 14:53:16
6 A I meant exactly those words, that I was 14:53:16
7 not going to compromise in an effort to 14:53:20
8 accommodate anybody else who may not know about 14:53:24
9 the specifics of the confidentiality requirements 14:53:27
10 and the judgment of the dissolution of marriage, 14:53:31
11 if, to do so, would expose Ms. Heard to a claim of 14:53:35
12 breach. 14:53:41
13 MS. BREDEHOFT: Okay. Alex, we can take 14:53:50
14 this one down, and let's go ahead and bring up 14:53:51
15 No. 20, which is Bates-stamped 16571 to 16574. 14:53:56
16 (Whereupon, the above-referenced document 14:53:56
17 was marked as Exhibit No. 20.) 14:54:26
18 MS. BREDEHOFT: Give me just a quick 14:54:26
19 second. 14:54:28
20 MR. CHEW: Elaine, what exhibit is this? 14:54:29
21 MS. BREDEHOFT: It's Exhibit No. 20. Give 14:54:31
22 me a second. I want to make sure that I -- 14:54:34

Transcript of Eric George
April 5, 2021

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1	THE WITNESS: Counsel, no urgency, but	14:54:40
2	whenever you get to a logical stopping point.	14:54:43
3	MS. BREDEHOFT: This would be a great time	14:54:46
4	because I'm a little confused on something. This	14:54:47
5	would be a great time. Thank you, Mr. George.	14:54:49
6	Do you want to take a 10-minute break?	14:54:50
7	THE WITNESS: That sounds good.	14:54:52
8	THE VIDEOGRAPHER: Off the record at 2:54.	14:54:54
9	(Whereupon, the court reporter noted the	14:54:54
10	witness's time as 11:54 a.m. Pacific.)	15:06:14
11	(A recess was taken.)	15:06:14
12	(Back on the record at 3:10 p.m.)	15:10:43
13	THE VIDEOGRAPHER: We are back on the	15:10:43
14	record at 3:10.	15:10:53
15	(Whereupon, the court reporter noted the	15:10:53
16	witness's time as 12:10 p.m. Pacific.)	15:10:58
17	MS. BREDEHOFT: Alex, can you bring up	15:10:58
18	Exhibit No. 22, please, and that's Bates stamp	15:11:00
19	16399 to 16403.	15:11:04
20	(Whereupon, the above-referenced document	15:11:04
21	was marked as Exhibit No. 22.)	15:11:13
22	BY MS. BREDEHOFT:	15:11:13

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1 Q Mr. George, I'm going to ask you to take a 15:11:27
2 look at what has been labeled as Exhibit No. 22. 15:11:29
3 And it has -- I'm going to kind of scroll down, 15:11:34
4 but I see you're looking at it. It has a series 15:11:38
5 of e-mails, and it starts with Amber sending to 15:11:44
6 Jessica Weitz and Robin Shulman, on December 11th, 15:11:55
7 with the edits -- we saw that exchange with you 15:11:58
8 earlier. And then as we go up, we have an e-mail 15:12:02
9 from Robin, to Amber, on December 12th, and she's 15:12:08
10 asking if there was room to rejigger a sentence. 15:12:15
11 "I signed an agreement not to talk about 15:12:21
12 my marriage and will not do that here." 15:12:23
13 Et cetera. "What happened to me publicly is more 15:12:27
14 interesting and revealing than what happened 15:12:30
15 within my marriage anyway - because it shows how 15:12:32
16 institutions protect men accused of abuse." 15:12:32
17 And her suggestion was, "Two years ago, 15:12:43
18 after I got a temporary restraining order against 15:12:46
19 my then-husband, I felt the full force of the 15:12:49
20 culture's wrath for women who speak out. I 15:12:54
21 remember the day I left the courtroom and walked 15:12:56
22 into a pack of hundreds of photographers. I 15:12:58

1 didn't have a team of bodyguards. My lawyers used 15:13:02
2 their own bodies to block out space for me to walk 15:13:06
3 to my car. The whole way there, I heard the press 15:13:09
4 yelling the same question in one form or another, 15:13:09
5 'Is it true you're making all this up.'" 15:13:11

6 Now, Amber sends this to you and Mr. Walsh 15:13:14
7 and Jennifer Robinson, and says, "Please see below 15:13:19
8 from editorial team at ACLU. I agree completely 15:13:24
9 and feel it's missing without having the below 15:13:29
10 originally included in the initial draft. Please 15:13:29
11 let me know if I can go ahead and try and rework 15:13:29
12 it a tiny bit." 15:13:37

13 And then your response, and we saw this 15:13:38
14 earlier when you tried to call her and said, 15:13:41
15 because of the judgment being as broad as it gets. 15:13:43

16 And then Sean Walsh comes back and says, 15:13:45
17 "I think Eric's edits still get us 95 percent of 15:13:48
18 what you want. I say send it out and damn the 15:13:52
19 torpedos ahead." 15:13:58

20 And then it comes back, and Amber is 15:13:58
21 responding to you, "Thank you for explaining it so 15:14:02
22 clearly." 15:14:10

1 And then you respond, on 12/12, at 15:14:10
2 3:59 a.m., and you say, "Thanks, A. Here's the 15:14:15
3 thing - any reference at all to marriage or 15:14:20
4 divorce, even to say the word marriage or divorce 15:14:22
5 and then elaborate that you're not, in fact, 15:14:24
6 talking about it, is a technical violation. Would 15:14:29
7 a reasonable ex or his lawyer object? Of course 15:14:31
8 not. Will the opposing side that we're dealing 15:14:34
9 with? Likely yes." 15:14:39

10 What did you mean by that? 15:14:39

11 MR. CHEW: Objection to the form of the 15:14:41
12 question. Objection, lack of foundation. 15:14:42
13 Hearsay. 15:14:47

14 A So I wanted to make sure that there would 15:14:47
15 be, not only any meritorious argument that anybody 15:14:53
16 would have that Amber Heard proceeded in a way 15:14:58
17 that violated the judgment of disillusion, but 15:15:02
18 also, as a practical matter to the extent 15:15:05
19 possible, she would, in fact, not find herself in 15:15:08
20 a situation where a claim was made against her. 15:15:11

21 Q Now, what did you mean by, "Would a 15:15:15
22 reasonable ex or his lawyer object? Of course 15:15:17

1 not. Will the opposing side that we're dealing 15:15:22

2 with? Likely, yes." 15:15:23

3 A That, with respect to the language that 15:15:26

4 had been proposed here by Robin Shulman at the 15:15:31

5 ACLU, "I signed an agreement not to talk about my 15:15:36

6 marriage and I will not do that here." It's not 15:15:41

7 unreasonable, per se, but, again, I wanted to make 15:15:45

8 sure that there was just absolutely no argument 15:15:49

9 that could reasonably be made at all that that 15:15:53

10 would justify a lawsuit against Ms. Heard. 15:15:56

11 Q And when you say, "Will the opposing side 15:16:03

12 that we're dealing with? Likely, yes." 15:16:08

13 Who were you referring to? 15:16:12

14 A Mr. Depp, because, as I mentioned earlier, 15:16:13

15 I had come to regard him as a highly litigious 15:16:17

16 individual. I certainly don't mean any disrespect 15:16:22

17 to Mr. Chew. I don't even know if he was involved 15:16:27

18 in the proceedings at that point. 15:16:28

19 But as far as Mr. Depp himself, there were 15:16:29

20 a series of lawsuits that he had brought that, of 15:16:31

21 course, had come to our attention in connection 15:16:35

22 with prior interactions, and I did not want that 15:16:39

1 same litigiousness to be brought against 15:16:44

2 Ms. Heard. 15:16:49

3 Q Thank you. Now, Mr. Chew just made an 15:16:50

4 objection to foundation here. Do you recognize 15:16:56

5 this document in front of us that's Exhibit 15:17:01

6 No. 22? 15:17:05

7 A Yes. I wrote it. 15:17:05

8 Q Okay. Now, all of the e-mails that I have 15:17:07

9 been showing you, that either have you copied to 15:17:11

10 you or from you on the e-mails, and I've asked you 15:17:15

11 questions about them, do -- is there any of those 15:17:20

12 documents that you did not recognize? 15:17:24

13 A No. Every one you've asked me about that 15:17:30

14 was purported to be authored by me, in fact, I did 15:17:34

15 author and send, and any one that was sent to me, 15:17:37

16 either directly or as a CC, I did receive. 15:17:41

17 And if I do come across any that I don't 15:17:45

18 believe that is the case, I'll be sure to point it 15:17:48

19 out to you and to Mr. Chew. 15:17:51

20 Q Thank you very much. 15:17:53

21 And did you -- was it your practice back 15:17:55

22 in November and December of 2018, to e-mail back 15:17:57

1 and forth with clients in the ordinary course of 15:18:02
2 business? 15:18:06

3 A Very much, and also including by text. 15:18:07

4 Q Yes. And that would be my next question. 15:18:13

5 The text messages that we saw, were those 15:18:16
6 actual text messages between you and Amber Heard? 15:18:19

7 A Yes. Same answer. Everything I saw that 15:18:22
8 was a text by me or to me, was, in fact, a text 15:18:25
9 that I sent or received. 15:18:32

10 And, again, if you present something to me 15:18:34
11 that I just have no recollection or I don't think 15:18:38
12 it's me but it purports to be, I'll, of course, 15:18:40
13 flag that for you and Mr. Chew. 15:18:45

14 Q Thank you very much. Okay. 15:18:48

15 Now, you then, in this e-mail on 15:18:49
16 12/12/2018, said, "So I propose we be artful in 15:18:54
17 the words we use, so we can convey the same 15:18:58
18 message without exposing you to the claim that you 15:19:01
19 violated the agreement." And then you made a 15:19:04
20 proposal here. 15:19:06

21 What did you mean by, "...so we can convey 15:19:07
22 the same message without exposing you to the claim 15:19:11

1 that you violated the agreement"? 15:19:14

2 A I wanted her to be able to speak in her 15:19:16

3 authentic voice about the issues that were 15:19:20

4 reflected in the op-ed, but to be able to do so 15:19:22

5 without exposing her to any meritorious claim, 15:19:26

6 and, really, also to minimize the likelihood that, 15:19:30

7 even if it were non-meritorious that she would, in 15:19:34

8 fact, get sued. Again, as we all know, you can't 15:19:38

9 prevent somebody from bringing suit but you can 15:19:43

10 try to handicap the situation and minimize the 15:19:46

11 likelihood of that by making the record one where 15:19:49

12 it just simply wouldn't be a reasonable suit that 15:19:53

13 somebody would be bringing. 15:19:56

14 Q And, at this time, was it your legal 15:19:57

15 opinion that the advice that you had provided to 15:20:01

16 Amber Heard in connection with the op-ed, was a 15:20:06

17 way to handicap and minimize the possibility of an 15:20:11

18 action being brought against her? 15:20:15

19 MR. CHEW: Objection. Calls for expert 15:20:17

20 testimony. Calls for speculation. 15:20:17

21 MS. BREDEHOFT: I'll rephrase. 15:20:23

22 BY MS. BREDEHOFT: 15:20:23

1 Q And, in connection with your 15:20:26
2 representation of Amber Heard, relating to the 15:20:28
3 op-ed, what was your objective in providing the 15:20:33
4 advice you gave to Amber Heard? 15:20:41

5 A Sure. It was to ensure that, with the 15:20:44
6 publication of such an op-ed as edited, that there 15:20:49
7 could be no meritorious claim brought against her, 15:20:57
8 whether it's in defamation or some other tort or 15:20:59
9 for violation of the Judgment of Dissolution of 15:21:03
10 Marriage, and also, to the extent possible, that 15:21:06
11 by rendering any such claim, a really unreasonable 15:21:09
12 or frivolous one, that she, in fact, would not 15:21:14
13 face such a claim. 15:21:17

14 MS. BREDEHOFT: Thank you. Okay. I'm 15:21:20
15 going to ask you -- Alex, if you can take down 22 15:21:23
16 and put up No. 23, please. 15:21:28

17 MR. CHEW: Counsel, what's the Bates 15:21:54
18 number? 15:21:56

19 MS. BREDEHOFT: Thank you. Bates 16444. 15:21:56
20 My apologies. 15:22:00

21 (Whereupon, the above-referenced document 15:22:00
22 was marked as Exhibit No. 23.) 15:22:11

1 BY MS. BREDEHOFT: 15:22:11

2 Q I'm going to show you what has been marked 15:22:11

3 as Deposition Exhibit No. 23, and this was -- we 15:22:14

4 saw part of this one before, the part to -- from 15:22:19

5 Amber expressing her concern on the language that 15:22:25

6 was nixed, but then I'm going to indicate here 15:22:29

7 that she asked Eric or Sean, would you be able to 15:22:33

8 speak soon with my team at the ACLU, and 15:22:39

9 Jessica Weitz and myself. And Sean responds, "Let 15:22:45

10 me know what works for you and I will adjust 15:22:50

11 accordingly." 15:22:52

12 Do you have any recollection of yourself 15:22:54

13 having a call with the ACLU team? 15:22:56

14 MR. CHEW: Objection. Lack of foundation. 15:23:00

15 Hearsay. Assumes facts not in evidence. 15:23:01

16 A I'm sorry, Counsel. I just don't. I 15:23:03

17 don't recollect any such conversation. It may 15:23:07

18 well be that you'll show me an e-mail or a text 15:23:10

19 where I say I just spoke to the ACLU people and I 15:23:15

20 said this, and maybe it will refresh, but as I sit 15:23:19

21 here, I don't have any recollection. 15:23:23

22 Q No, that's fine. Okay. 15:23:25

1 MS. BREDEHOFT: We can take that down. 15:23:32

2 I'm going to ask to you bring up No. 24, Alex, and 15:23:43

3 it's Bates stamped 16445 through 16448. 15:23:47

4 (Whereupon, the above-referenced document 15:23:52

5 was marked as Exhibit No. 24.) 15:24:09

6 BY MS. BREDEHOFT: 15:24:09

7 Q Now, I'm just going to show you this for a 15:24:10

8 brief -- 15:24:14

9 MS. BREDEHOFT: Alex, can I take control, 15:24:17

10 please. It's not -- there we go. Now I am. 15:24:21

11 Thank you. 15:24:24

12 BY MS. BREDEHOFT: 15:24:24

13 Q Just at the top Robin Shulman sends an 15:24:25

14 e-mail, on 12/12, to Sean, with a CC to you, as 15:24:27

15 well as Jessica Weitz, and says, "Thanks so much 15:24:34

16 Amber and Sean. I so appreciate your work on the 15:24:37

17 project -- I appreciate your work to protect Amber 15:24:40

18 and also make this piece true to her experience." 15:24:43

19 This would suggest that the call was just 15:24:48

20 with Sean, was it not? 15:24:52

21 MR. CHEW: Objection. Lacks foundation. 15:24:54

22 Assumes facts not in evidence. 15:24:55

1 MS. BREDEHOFT: You know, I'll withdraw 15:24:57
2 that one. Let's take this one down and let's go 15:24:59
3 to the next. 15:25:02
4 Let's go to Exhibit No. 25. 15:25:07
5 THE TECHNICIAN: Counsel, the Bates 15:25:07
6 numbers again? 15:25:07
7 MS. BREDEHOFT: I'm sorry 16461 through 15:25:22
8 16464. 15:25:23
9 (Whereupon, the above-referenced document 15:25:23
10 was marked as Exhibit No. 25.) 15:25:56
11 THE VIDEOGRAPHER: Is it me, or is the 15:25:56
12 image of Mr. George very, very blurry all of a 15:25:59
13 sudden? 15:25:59
14 Oh, there you go. Thank you. 15:26:06
15 THE WITNESS: Maybe it improves things. 15:26:06
16 BY MS. BREDEHOFT: 15:26:08
17 Q All right. I'm going to show what has 15:26:09
18 been marked as Deposition Exhibit No. 25, and I'm 15:26:10
19 going to -- this is -- I'm going to focus first on 15:26:15
20 an e-mail from Robin Shulman, on 15:26:21
21 December 12th, 2018, and highlight the section 15:26:25
22 that she suggests, that's, "Then two years ago, 15:26:27

1 after I became a public figure representing 15:26:32
2 domestic abuse, I felt the full force of our 15:26:35
3 culture's wrath for women to speak out. Once, I 15:26:38
4 had to walk into a pack of hundreds of 15:26:42
5 photographers, many of them yelling the same 15:26:45
6 question in one form or another: 'Is it true 15:26:47
7 you're making all this up.' 15:26:50

8 Do you see that? 15:26:52

9 A I do. 15:26:53

10 Q Okay. And then I'm going to direct your 15:26:53
11 attention up to the top where you respond to 15:26:55
12 Robin Shulman. "Robin, good edits re the paragraph 15:26:58
13 you forwarded. Can you please circulate a new 15:27:02
14 version with the same, and I'll give a final 15:27:06
15 review." 15:27:09

16 Do you recall that? 15:27:10

17 A Not specifically. But I certainly have no 15:27:11
18 doubt that I wrote that. 15:27:14

19 Q Okay. And why would it be important to 15:27:15
20 you to have a full version, the new version with 15:27:17
21 all the incorporated parts into it? 15:27:20

22 MR. CHEW: Objection. Argumentative and 15:27:22

1 leading. 15:27:24

2 A I wanted to make sure, as my general 15:27:25

3 practice, that I would be seeing a final and 15:27:30

4 complete draft of whatever it was that I was being 15:27:33

5 asked to opine about. 15:27:35

6 MS. BREDEHOFT: Okay. Good. 15:27:38

7 Let's take down No. 25, and then go to 26, 15:27:39

8 and that is Bates-stamped 16484 through 16489. 15:27:43

9 (Whereupon, the above-referenced document 15:27:50

10 was marked as Exhibit No. 26.) 15:27:51

11 BY MS. BREDEHOFT: 15:27:51

12 Q And this is on 12/13/2018, and it's from 15:28:07

13 you, to Sean Walsh, CC Amber, Jessica Weitz, 15:28:19

14 Robin Shulman, and it says, "Go with this. 15:28:24

15 Identical to your version minus one sentence. 15:28:27

16 (Once I had to go into a pack of yelling 15:28:30

17 journalists asking if I was lying), which too 15:28:33

18 directly raises the issue of the allegations about 15:28:35

19 what you're lying about." 15:28:38

20 What did you mean by this? 15:28:41

21 MR. CHEW: Objection. Lack of foundation. 15:28:43

22 Assumes facts not in evidence. 15:28:44

1 A This is part and parcel of my objective of 15:28:46
2 making sure that she would not have anything 15:28:54
3 published that could run afoul of either the 15:28:58
4 confidentiality provisions contained in the 15:29:03
5 judgment of the dissolution of marriage, or some 15:29:06
6 other claim against her. 15:29:10

7 Q Okay. What, if anything, are you 15:29:14
8 suggesting that Amber Heard is lying about 15:29:18
9 something? 15:29:21

10 A No, no. I wouldn't want somebody to say 15:29:22
11 she was lying about something. No, to be crystal 15:29:27
12 clear, I'm not suggesting that she has lied or 15:29:33
13 would lie about anything that I know about. To 15:29:38
14 the contrary, in my relationship with her, I 15:29:44
15 always found the opposite. 15:29:48

16 MR. CHEW: Move to strike that as 15:29:49
17 nonresponsive. 15:29:52

18 BY MS. BREDEHOFT: 15:29:53

19 Q And just to stay on that for a moment to 15:29:54
20 make sure that we're clear, what do you mean by, 15:29:57
21 "...too directly raises the issue of allegations 15:30:09
22 about what you're lying about"? 15:30:12

1 A So if -- as I'm looking at this now, if 15:30:16
2 you kept in this particular sentence, the one I 15:30:19
3 have in a parenthetical, it arguably, and I'm 15:30:22
4 being generous, could permit somebody to say that 15:30:28
5 she is referencing something that she should not 15:30:34
6 be referencing in -- as a result of the 15:30:38
7 confidentiality provision in the divorce judgment. 15:30:42

8 Q Okay. Thank you. Thank you. 15:30:47

9 MS. BREDEHOFT: We can take this one down 15:30:49
10 now, and let's go to Exhibit No. 27, and that's 15:30:52
11 Bates stamp 16297 to 16305. 15:30:58

12 (Whereupon, the above-referenced document 15:30:58
13 was marked as Exhibit No. 27.) 15:31:04

14 BY MS. BREDEHOFT: 15:31:04

15 Q And this is an e-mail from Robin Shulman, 15:31:14
16 on 12/13, to Sean Walsh and you, with some copies, 15:31:19
17 and it says, "RE: Language - Time Sensitive." 15:31:27

18 And it says, "Hi Eric, Amber, I'm so sorry 15:31:33
19 to revisit this when we thought it was in the bag, 15:31:34
20 but a colleague just read the piece and noted that 15:31:37
21 because of the text we removed it still felt 15:31:41
22 confusing on top about what actually happened -- 15:31:45

1 why Amber started losing roles and why her career 15:31:47
2 was in jeopardy. We have a solution here, below 15:31:51
3 -- we cut a few lines and slightly changed some 15:31:54
4 wording. There's one new clause I've highlighted. 15:31:57
5 Eric, does that work for you?" 15:32:01

6 And then the one that's highlighted is, "I 15:32:03
7 had the rare vantage point of seeing in realtime 15:32:06
8 how institutions protect men accused of abuse." 15:32:09

9 What is your understanding of what 15:32:15
10 Ms. Shulman was asking of you there? 15:32:18

11 MR. CHEW: Objection. Lack of foundation. 15:32:20
12 Assumes facts not in evidence. Hearsay. 15:32:22

13 A I really counseled just what Ms. Shulman 15:32:25
14 had written me to the effect that one of her 15:32:28
15 colleagues felt that something needed to be 15:32:31
16 changed or added in the draft at that point in 15:32:34
17 time. 15:32:36

18 MS. BREDEHOFT: Okay. And then if we can 15:32:40
19 take this one down and go to 28, please. And 15:32:42
20 that's Bates stamp 16306 to 16312. 15:32:45

21 (Whereupon, the above-referenced document 15:32:54
22 was marked as Exhibit No. 28.) 15:32:55

1	BY MS. BREDEHOFT:	15:32:55
2	Q I'm going to show you what has been marked	15:33:01
3	as Deposition Exhibit No. 28, and it's an e-mail	15:33:03
4	from you, on 12/13, back to Robin Shulman, with	15:33:06
5	copies, and it has the same chain that we just saw	15:33:10
6	on the last exhibit, 27, and your response is,	15:33:13
7	"All good to go."	15:33:17
8	What did you mean by that?	15:33:19
9	MR. CHEW: Objection. Lack of foundation.	15:33:20
10	Assumes facts not in evidence.	15:33:22
11	A With that one change, that I was	15:33:24
12	comfortable that the piece could be published	15:33:27
13	without there being any meritorious argument that	15:33:30
14	would constitute a breach of the divorce judgment	15:33:34
15	or otherwise defame somebody or constitute some	15:33:38
16	other tort.	15:33:43
17	MS. BREDEHOFT: Thank you.	15:33:43
18	All right. We can take that down and	15:33:46
19	let's go to 29. And this is Bates stamp 16502 to	15:33:48
20	16510.	15:33:59
21	(Whereupon, the above-referenced document	15:34:03
22	was marked as Exhibit No. 29.)	15:34:04

1 BY MS. BREDEHOFT: 15:34:04

2 Q Mr. George, I'd like you to take a look at 15:34:07

3 Deposition Exhibit No. 29, and it has some of the 15:34:12

4 same stream that we saw earlier. And starts at 15:34:15

5 the bottom of that page is the, "All good to go." 15:34:19

6 And then there is a few e-mail exchanges following 15:34:24

7 that. And Amber asks, "Robin, when it's all ready 15:34:28

8 to go and finalized, would you mind sending me the 15:34:38

9 draft, so I have it in one place." 15:34:41

10 And then Robin Shulman sends it, including 15:34:43

11 a copy to you. 15:34:46

12 Do you see that? 15:34:47

13 A I do. 15:34:48

14 MR. CHEW: Objection. Lack of foundation. 15:34:48

15 Hearsay. Argumentative. Assumes facts not in 15:34:52

16 evidence. 15:34:55

17 BY MS. BREDEHOFT: 15:34:55

18 Q All right. And, then, attached to this 15:34:57

19 e-mail is a draft of the final. What, if 15:35:00

20 anything, do you recall of reading the final that 15:35:12

21 was then sent on 12/14? 15:35:16

22 MR. CHEW: Objection. Lack of foundation. 15:35:18

1 Assumes facts not in evidence. 15:35:19

2 A I don't specifically recollect anything, 15:35:24

3 other than presumably noting that the final had 15:35:27

4 the last edit in place. 15:35:34

5 Q Okay. Thank you. 15:35:40

6 MS. BREDEHOFT: And let's go now to 15:35:40

7 Exhibit No. 30, Alex, and this is Bates-stamped 15:35:44

8 16510 to 16528. 15:35:47

9 (Whereupon, the above-referenced document 15:35:50

10 was marked as Exhibit No. 30.) 15:35:51

11 BY MS. BREDEHOFT: 15:35:51

12 Q Mr. George, I'm going to ask you to take a 15:36:02

13 look at what's been marked as Deposition Exhibit 15:36:05

14 No. 30. 15:36:09

15 A All right. 15:36:17

16 Q And I'm just going to focus your attention 15:36:18

17 on the top, because it's part of the string before 15:36:21

18 that we've seen already and talked about. It's 15:36:24

19 from Jessica Weitz, on 12/14, to Sean Walsh, 15:36:27

20 copying Robin Shulman and you and Amber. 15:36:32

21 And it says, "It's going to the Washington 15:36:35

22 Post. It will run next week and we are awaiting 15:36:39

1 final details. Stay tuned for more." 15:36:43

2 What, if anything, did you think about the 15:36:46

3 fact that this was going to the Washington Post 15:36:49

4 and how that may impact, in any manner, your 15:36:52

5 review of the op-ed or anything relating to your 15:36:58

6 advice on the op-ed? 15:37:01

7 MR. CHEW: Objection. Vague and 15:37:03

8 ambiguous. 15:37:03

9 A So I think it was consistent with my 15:37:16

10 expectation that this would be an op-ed that would 15:37:19

11 be published in a significant newspaper. Having 15:37:20

12 done the homework and the editing that we did, it 15:37:22

13 didn't impact me at all, for purposes of the 15:37:26

14 analysis that we had previously performed. I was 15:37:29

15 comfortable with this being published anywhere. 15:37:32

16 MS. BREDEHOFT: All right. Now if we can 15:37:36

17 take this down and go to Exhibit No. 32. And 15:37:38

18 that's Bates-stamped 16328 to 16338. 15:37:49

19 (Whereupon, the above-referenced document 15:37:55

20 was marked as Exhibit No. 32.) 15:37:57

21 BY MS. BREDEHOFT: 15:37:57

22 Q And I'm going to direct your attention, 15:38:11

1 Mr. George, to Deposition Exhibit No. 32, on the 15:38:13
2 first page, which is a continuation of what we 15:38:18
3 looked at on the last one, but the first page is 15:38:22
4 the next series. And I'm going to ask you to 15:38:25
5 focus for a moment on December 17, 2018, from 15:38:31
6 Robin Shulman. It says, "Here's the edit back 15:38:36
7 from the Washington Post. The only real change I 15:38:39
8 noticed was in the very first line when they cut 15:38:42
9 the first mention of being an early witness to 15:38:45
10 abuse. I added the bit about 'one of my own 15:38:48
11 lawyers' in bold. Amber, could you take a look by 15:38:52
12 tomorrow morning so we can get back to them?" 15:38:56

13 And then you come back after that on 15:39:00
14 12/17, and say, "Robin, all good except that edit 15:39:03
15 is a no go. Please explain to the Post that one 15:39:08
16 cannot reveal discussions with a lawyer without 15:39:12
17 waiving the attorney-client privilege. Can't let 15:39:14
18 that happen here, especially since the edit adds 15:39:17
19 nothing. Amber can simply say that an advisor 15:39:21
20 made the statement to her. Okay?" 15:39:24

21 What did you mean by that? 15:39:28

22 MR. CHEW: Objection. Lack of foundation. 15:39:28

1 Hearsay. Assumes facts not in evidence. 15:39:32

2 A Well, let me answer with an answer and 15:39:35

3 also a question. I was, again, to our earlier 15:39:38

4 discussion, making sure, as best as I could, that 15:39:45

5 the ultimate incarnation of the op-ed would, in no 15:39:52

6 way, run afoul of either the judgment of 15:39:55

7 dissolution's confidentiality provision or any 15:40:01

8 defamation or other tort law. 15:40:02

9 But my question is, just so I can see 15:40:06

10 specifically where this went, whether beginning at 15:40:10

11 page 16332, or somewhere else, that suggested edit 15:40:15

12 is actually contained here, and, if so, where it 15:40:23

13 is? 15:40:28

14 Anyway -- you know what, I don't want to 15:40:30

15 make things more complicated. I'm sorry guys, let 15:40:34

16 me just stick with that answer. 15:40:38

17 Q And the problem, Mr. George, is, with all 15:40:39

18 of these e-mails and trails, we have a number of 15:40:43

19 different drafts of the op-ed, so it's sometimes 15:40:46

20 kind of confusing to figure out which one they're 15:40:49

21 referring to with the attachments, I have to tell 15:40:53

22 you. 15:40:56

1 A No doubt. No doubt. 15:40:56

2 Q I think we can just work with your answer 15:40:58

3 on that one and it works. 15:41:00

4 MS. BREDEHOFT: Let's take down 32, and go 15:41:03

5 with 33, and that might be helpful on this. And 15:41:06

6 that is Bates stamp 16350, to 16362. 15:41:15

7 (Whereupon, the above-referenced document 15:41:15

8 was marked as Exhibit No. 33.) 15:41:27

9 BY MS. BREDEHOFT: 15:41:27

10 Q And this is on 12/18, and I'm going to ask 15:41:27

11 you to take a look at what has been marked as 15:41:32

12 Deposition Exhibit No. 33, and it's an e-mail 15:41:34

13 exchange on the top. The top page we can continue 15:41:39

14 with the others, and it comes back from 15:41:44

15 Robin Shulman in response to yours, "I think what 15:41:47

16 you're referring to is just that slight change to 15:41:50

17 wording of our previous language that has been in 15:41:54

18 the piece all along - from 'my own lawyer' to 'one 15:41:56

19 of my own lawyers,' but if you feel it's 15:41:59

20 problematic, we can reword. We'd have to change 15:42:03

21 those sentences to, 'My own friends and advisors 15:42:07

22 told me I would never work again as an actress, 15:42:11

1 I'd be blacklisted.' 15:42:14

2 "Sound good to you, Amber? Is that what 15:42:14

3 you want, Eric?" 15:42:17

4 And you answer, "Yes, since the word 15:42:17

5 'lawyer' can't be included without possibly 15:42:20

6 waiving privilege." 15:42:22

7 What did you mean by that? 15:42:24

8 MR. CHEW: Objection. Lack of foundation. 15:42:26

9 Hearsay. Assumes facts in the evidence. 15:42:31

10 A That it was an important edit to remove 15:42:32

11 reference to what a lawyer told her, because if 15:42:35

12 you include that, then you possibly waive 15:42:38

13 attorney-client privilege, and open up to 15:42:40

14 discussion whether, in a piece of litigation or, 15:42:45

15 perhaps, otherwise, what you communicated about 15:42:49

16 with your own lawyer. 15:42:52

17 Q Okay. Thank you. 15:42:54

18 MS. BREDEHOFT: We can take down 33 and 15:42:54

19 we'll go to 34. And it's Bates-stamped 16363 to 15:42:58

20 16373. 15:43:19

21 (Whereupon, the above-referenced document 15:43:19

22 was marked as Exhibit No. 34.) 15:43:23

1 BY MS. BREDEHOFT: 15:43:23

2 Q Mr. George, I'm going to ask you to take a 15:43:29

3 look at what has been marked as Deposition Exhibit 15:43:32

4 No. 34, and I'm going to just focus on the first 15:43:35

5 page, where it says, on 12/18, 5:05 p.m., from 15:43:42

6 Jessica Weitz, Robin Shulman, and Sean Walsh, and 15:43:48

7 you are copied. "Fantastic! Robin or I will get 15:43:51

8 you the cleanest copy of this. We just heard from 15:43:56

9 the Washington Post that this will be in the paper 15:44:00

10 tomorrow. I will send through suggested share 15:44:03

11 language under separate cover with Amber, Sara, 15:44:04

12 and Jodi." 15:44:08

13 Do you see that? 15:44:09

14 A I do. 15:44:10

15 Q Okay. And, in fact, was this published on 15:44:10

16 12/18 -- was that, in fact, published the 15:44:13

17 following day? 15:44:16

18 A I know it was published subsequently. I 15:44:17

19 don't know if it was the next day or day after, 15:44:20

20 but close in proximity. 15:44:22

21 Q Okay. Thank you. 15:44:26

22 MS. BREDEHOFT: We can take that down and 15:44:26

1 go to Exhibit No. 35. And that's Bates stamp 15:44:28

2 16374 to 16386. 15:44:42

3 (Whereupon, the above-referenced document 15:44:47

4 was marked as Exhibit No. 35.) 15:44:47

5 THE WITNESS: Got it. 15:44:58

6 MR. CHEW: Any question, or what? 15:44:59

7 MS. BREDEHOFT: I'm getting close. Are 15:45:02

8 you getting impatient, Ben? 15:45:05

9 MR. CHEW: Well, it would be nice to have 15:45:09

10 a question every once in a while. 15:45:11

11 BY MS. BREDEHOFT: 15:45:13

12 Q Okay. So I'm going to ask you to take a 15:45:13

13 look at what has been marked Deposition 15:45:16

14 Exhibit No. 35, it's from Robin Shulman, to Amber, 15:45:19

15 12/18, and it says, "Here it is final." 15:45:21

16 And I'm just going to ask you, Mr. George, 15:45:25

17 if you can go down to the last two pages of this, 15:45:28

18 which is 16385 and 16386, and take a look at that, 15:45:33

19 and I'm going to ask you if, to your recollection, 15:45:44

20 that appears to be the final of the op-ed that was 15:45:47

21 published? 15:45:51

22 MR. CHEW: And objection. Lack of 15:45:52

1 foundation. 15:46:53

2 (Whereupon, a pause in the proceedings 15:46:53

3 occurred.) 15:46:55

4 A So let me just say this: I've just read 15:46:55

5 it a little bit quickly, but the best I can tell 15:47:04

6 you is, this appears to be consistent with what 15:47:10

7 the final version of it was. I obviously can't 15:47:13

8 swear to it, that this is, indeed, the final 15:47:17

9 version, but by my way of looking at it, it could 15:47:19

10 well be and perhaps is, and I don't have any 15:47:23

11 reason to believe that it's not. 15:47:25

12 Q Did you see, in advance, any title or 15:47:27

13 header to the op-ed? 15:47:32

14 A I don't believe I did. 15:47:35

15 Q Okay. Who -- did you have any 15:47:36

16 understanding of who created the title that was 15:47:42

17 actually published? 15:47:45

18 A No. 15:47:47

19 Q What, if any, legal advice provided by you 15:47:47

20 to Amber Heard, respecting the Washington Post 15:47:56

21 op-ed, was disregarded by Amber Heard? 15:48:02

22 MR. CHEW: Objection to the form of the 15:48:04

1 question. Calls for speculation. 15:48:06

2 A None, to my knowledge. 15:48:08

3 Q And what, if any, legal advice given to 15:48:11

4 you by Amber Heard, respecting the Washington Post 15:48:13

5 op-ed, was followed by Amber Heard? 15:48:16

6 A You may have misstated that one. It's 15:48:19

7 probably better if you ask again. 15:48:24

8 Q What, if any, legal advice provided by you 15:48:26

9 to Amber Heard, respecting the Washington Post 15:48:34

10 op-ed, was followed by Amber Heard? 15:48:37

11 A All of it. 15:48:42

12 Q Did there come a time when you learned 15:48:44

13 Amber Heard was sued by Mr. Depp as a result of 15:48:49

14 the op-ed? 15:48:53

15 A Yes. 15:48:55

16 Q I'm going to ask you to take a look -- 15:48:56

17 MS. BREDEHOFT: If we can take this down 15:49:02

18 and go to Exhibit No. 36. 15:49:05

19 (Whereupon, the above-referenced document 15:49:29

20 was marked as Exhibit No. 36.) 15:49:30

21 BY MS. BREDEHOFT: 15:49:30

22 Q Mr. George, I'm going to ask that you take 15:49:30

1 a look at what has been marked as Plaintiff's 15:49:33
2 Exhibit -- or Exhibit No. 36, and do you recognize 15:49:36
3 this document? 15:49:44
4 A I do. 15:49:50
5 Q And what is your understanding of what it 15:49:53
6 is? 15:49:56
7 A It is what it purports to be; namely, the 15:49:56
8 lawsuit brought by Mr. Depp against Ms. Heard. 15:50:00
9 Q What did you do as a result of this 15:50:08
10 complaint being filed? 15:50:10
11 A I and my firm represented Ms. Heard in 15:50:14
12 connection with filing a response to that 15:50:24
13 complaint, namely defending her. 15:50:27
14 Q Okay. I want to ask you to just take a 15:50:30
15 look down, and I'm going to go to the "Causes of 15:50:34
16 Action." What, if any, understanding did you have 15:50:39
17 of whether Mr. Depp sued Amber Heard for any 15:50:42
18 breach of the stipulated judgment of dissolution 15:50:47
19 of the marriage? 15:50:55
20 A So if you don't mind, let me grab a copy 15:50:55
21 of that here, from Mr. Schwartz. 15:51:00
22 Q Yes. 15:51:04

1	A If he has it.	15:51:04
2	MR. SCHWARTZ: We may not have that handy.	15:51:16
3	I can print that out, if you like.	15:51:20
4	A I'll tell you what I would do, if I had it	15:51:24
5	here. I'd skip all to the particular counts, just	15:51:25
6	to refresh my recollection.	15:51:28
7	Q Yeah, let me do that. So Count 1, do you	15:51:33
8	see that?	15:51:36
9	A Yes.	15:51:37
10	Q Tell me if I'm going too fast.	15:51:37
11	A No, no. That's fine. I'm really just	15:51:45
12	looking at the headings. Okay. Got it.	15:51:47
13	Q Two.	15:51:50
14	A Got it.	15:51:52
15	Okay. Yes, so I can answer your question.	15:51:57
16	That, as pleaded, the complaint did not allege a	15:52:00
17	violation of the confidentiality provisions in the	15:52:05
18	Judgement of Dissolution of Marriage.	15:52:11
19	Q Instead, what claims did Mr. Depp assert	15:52:16
20	against Amber Heard?	15:52:19
21	MR. CHEW: Objection. The document speaks	15:52:20
22	for itself.	15:52:22

1 BY MS. BREDEHOFT: 15:52:22

2 Q That's fine. I'll withdraw that. 15:52:23

3 If Mr. Depp had sued Ms. Heard in 15:52:25

4 California, what defense would have been available 15:52:30

5 to Amber Heard immediately? 15:52:32

6 MR. CHEW: Objection. Calls for legal 15:52:33

7 conclusion. Calls for expert testimony. 15:52:35

8 A So again, as within the scope of the 15:52:39

9 waiver of privilege. 15:52:47

10 MR. CHEW: Oh, don't worry about that. 15:52:49

11 A Okay. Well, I do worry. 15:52:54

12 MR. CHEW: That horse has left the barn. 15:52:56

13 MS. BREDEHOFT: No, it hasn't. 15:52:59

14 THE WITNESS: Well, I want to be very 15:53:02

15 clear that, obviously, with respect to privilege, 15:53:04

16 I know Mr. Chew will understand that, I'm taking 15:53:07

17 my direction from Ms. Heard. 15:53:12

18 MS. BREDEHOFT: Well, let me -- 15:53:14

19 MR. CHEW: Mr. George, you're absolutely 15:53:16

20 right to do that. You're absolutely right to take 15:53:18

21 your cue from Ms. Bredehoft and not from me. I 15:53:22

22 didn't mean to suggest otherwise. 15:53:27

1 THE WITNESS: Nor, Mr. Chew, I wasn't 15:53:27
2 suggesting otherwise. I just want to be clear 15:53:30
3 that because of -- 15:53:32
4 By MS. BREDEHOFT: 15:53:32
5 Q Mr. George, let me withdraw that question 15:53:33
6 and let me phrase it a little differently. 15:53:36
7 A Sure. 15:53:41
8 Q While you were representing Amber Heard in 15:53:42
9 connection with the drafting of the publication of 15:53:47
10 the op-ed, what, if any, consideration did you 15:53:50
11 provide to the anti-SLAPP provisions available to 15:53:55
12 Ms. Heard if she was sued for defamation? 15:54:03
13 A Sure. 15:54:06
14 MR. CHEW: Objection. Vague and 15:54:06
15 ambiguous. 15:54:09
16 A So we were eager to have this suit moved 15:54:09
17 to California, where our analysis and advice to 15:54:17
18 the client was that the claims against her, if 15:54:23
19 they continued to be pursued against her in 15:54:29
20 California, would enable her to file what's called 15:54:33
21 an anti-SLAPP, S-L-A-P-P claim, or defense, which 15:54:37
22 would result in both an abbreviated resolution of 15:54:44

1 this entire matter, and, ideally the reimbursement 15:54:48
2 to Ms. Heard of all the attorney fees she was 15:54:53
3 forced to expend. 15:54:56

4 Q Thank you. Now, did you -- did you enter 15:54:59
5 an appearance on behalf of Ms. Heard in this 15:55:03
6 litigation? 15:55:06

7 A I did. 15:55:08

8 MS. BREDEHOFT: Okay. I'm going to ask if 15:55:11
9 you can take this down, Alex, and bring out 15:55:12
10 Exhibit No. 37. 15:55:16

11 (Whereupon, the above-referenced document 15:55:31
12 was marked as Exhibit No. 37.) 15:55:32

13 BY MS. BREDEHOFT: 15:55:32

14 Q And do you recognize this document, 15:55:32
15 Mr. George? 15:55:35

16 A Excuse me, one second. Yes, okay. And 15:55:38
17 Rick just handed it to me. 15:55:45

18 I do. 15:55:59

19 Q Okay. And what, if anything, did you do 15:56:00
20 with -- did you file that with the court? 15:56:06

21 A I believe I did. 15:56:08

22 MS. BREDEHOFT: Okay. And if we can take 15:56:13

1 down Exhibit 37 and bring up Exhibit 38, please. 15:56:15

2 (Whereupon, the above-referenced document 15:56:20

3 was marked as Exhibit No. 38.) 15:56:20

4 BY MS. BREDEHOFT: 15:56:20

5 Q I'm going to ask you, Mr. George, to look 15:56:30

6 at what has been labeled as Exhibit No. 38. 15:56:32

7 Do you recognize this document? 15:56:37

8 A Yes, I do. 15:56:39

9 Q Okay. And could you describe what it is. 15:56:54

10 A It's entitled "Consent Order." That's the 15:56:57

11 order by which I was permitted, as an attorney who 15:57:01

12 otherwise is not licensed to practice in Virginia, 15:57:04

13 to, for purposes of this particular case, 15:57:08

14 represent Ms. Heard in a Virginia court. 15:57:11

15 MS. BREDEHOFT: Okay. All right we can 15:57:18

16 take that down. 15:57:20

17 Q And what action did you bring on 15:57:21

18 Amber Heard's behalf, with respect to venue, in 15:57:25

19 other words, any challenge to the case being 15:57:30

20 brought in Virginia? 15:57:32

21 MR. CHEW: Objection. Leading. 15:57:33

22 BY MS. BREDEHOFT: 15:57:35

1 Q You got foggy there again. 15:57:36

2 MR. CHEW: Objection. Leading. 15:57:40

3 MS. BREDEHOFT: Ben, I'm just telling him 15:57:42

4 on the camera, he's blurry again. 15:57:44

5 MR. CHEW: No, I'm objecting to your 15:57:49

6 question, not to the blurriness. 15:57:51

7 BY MS. BREDEHOFT: 15:57:54

8 Q Do you remember the question, Mr. George? 15:57:54

9 A I do. I filed a motion to have the venue 15:57:56

10 transferred from Virginia to a California court. 15:58:00

11 We were not successful before the trial court in 15:58:06

12 doing so. 15:58:09

13 Q Okay. And did there come a time, shortly 15:58:11

14 thereafter, that you withdrew as counsel in this 15:58:13

15 case? 15:58:16

16 A There did. 15:58:16

17 Q And I'm going to have you -- 15:58:17

18 MS. BREDEHOFT: Let's bring up 15:58:19

19 Exhibit No. 36. 15:58:21

20 You know, Alex, I think that's not 15:58:51

21 Exhibit 36 -- I meant 39. My apologies, that was 15:58:54

22 my fault, 39. 15:59:00

1 (Whereupon, the above-referenced document 15:59:02
2 was marked as Exhibit No. 39.) 15:59:07

3 MR. CHEW: Although I certainly agree with 15:59:07
4 the sentiments expressed in this document. 15:59:10

5 MS. BREDEHOFT: Alex, are you taking down 15:59:29
6 this one and putting up 39? 15:59:32

7 There we go. 15:59:35

8 BY MS. BREDEHOFT: 15:59:38

9 Q Mr. George, I'm going to ask you to take a 15:59:39
10 look at what has been marked as Deposition 15:59:41
11 Exhibit 39. Do you recognize this document? 15:59:44

12 A I don't know that I've actually seen this 15:59:49
13 before, but I would have expected that there would 15:59:52
14 be some such document. 15:59:55

15 Q Okay. And there's language in here that 15:59:57
16 says -- up a little further -- that says, 16:00:05
17 "Defendant no longer wishes to have Eric George 16:00:19
18 and Richard Schwartz represent her in this 16:00:22
19 lawsuit." 16:00:25

20 Do you see that? 16:00:26

21 A I do. 16:00:27

22 Q Was that your language? 16:00:27

1	A No.	16:00:29
2	Q Do you know whose language that was?	16:00:29
3	A I don't.	16:00:31
4	Q Okay. Was your withdrawal at all	16:00:33
5	acrimonious?	16:00:37
6	A Not at all.	16:00:38
7	MS. BREDEHOFT: Let's take this one down	16:00:41
8	and go to Exhibit No. 40.	16:00:43
9	(Whereupon, the above-referenced document	16:00:43
10	was marked as Exhibit No. 40.)	16:01:01
11	BY MS. BREDEHOFT:	16:01:01
12	Q And I'm going to ask you to take a look at	16:01:02
13	what has been marked as Exhibit No. 40. And this	16:01:05
14	is an order entered by the Court, correct?	16:01:11
15	A It does appear that way, yes.	16:01:16
16	Q And it consents to your withdrawal,	16:01:19
17	correct?	16:01:22
18	A Exactly.	16:01:22
19	Q All right. And counsel for Mr. Depp	16:01:23
20	consented to that as well, correct?	16:01:26
21	A Yes.	16:01:35
22	Q Okay. All right. And so as of	16:01:36

1 November 12th, 2019, you no longer represented 16:01:45

2 Amber Heard, correct? 16:01:49

3 A Exactly. 16:01:51

4 Q Okay. 16:01:52

5 MS. BREDEHOFT: Thank you very much. I 16:01:53

6 have no further questions at this time. 16:01:54

7 MR. SCHWARTZ: So Counsel, it's 1:00 here 16:02:00

8 in Los Angeles, or a little bit thereafter. Is 16:02:02

9 now a good time to take a lunch break? 16:02:04

10 MR. CHEW: Sure that's fine. How long, 16:02:06

11 Mr. George, would you like to take? 16:02:09

12 THE WITNESS: It would be unfair to ask 16:02:12

13 you how long you plan on going, but I'll ask 16:02:14

14 anyway. If it's a relatively manageable period, 16:02:18

15 Ben, I'm happy to just plow through and not take a 16:02:22

16 lunch break. If you're talking about something 16:02:27

17 longer than that, probably I ought to grab a 16:02:30

18 little something here. 16:02:33

19 MR. CHEW: In all candor -- and, please, 16:02:35

20 don't hold me to this, I think probably a couple 16:02:38

21 of hours, as long as Ms. Bredehoft had. 16:02:41

22 THE WITNESS: Okay. So if you don't mind, 16:02:44

Transcript of Eric George

April 5, 2021

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1	let me grab something. Of course, the question is	16:02:49
2	where. I have an idea, if you don't mind, and	16:02:50
3	please tell us if any of you does, let's just take	16:02:56
4	five minutes, we're going to order something	16:02:59
5	quickly. It's going to take a little while to get	16:03:01
6	here, and then we can just-- se can continue on.	16:03:05
7	When it arrives, we'll take 20 minutes and then	16:03:07
8	come back.	16:03:11
9	Does that sound okay?	16:03:11
10	MR. CHEW: Not only okay, but brilliant.	16:03:13
11	THE WITNESS: Okay. Wonderful.	16:03:15
12	MR. CHEW: Thank you.	16:03:17
13	THE VIDEOGRAPHER: Off the record at 4:03.	16:03:18
14	(Whereupon, the court reporter noted the	16:03:18
15	witness's time as 1:03 Pacific.)	16:03:23
16	(A recess was taken.)	16:03:23
17	THE VIDEOGRAPHER: We're back on the	16:16:16
18	record at 4:16.	16:16:25
19	(Whereupon, the court reporter noted the	16:16:25
20	witness's time as 1:16 Pacific.)	16:16:25
21	EXAMINATION	16:16:25
22	BY MR. BENJAMIN G. CHEW:	16:16:25

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1 Q Good afternoon, Mr. George. It's good to 16:16:32
2 see you again. 16:16:34

3 A You too, Mr. Chew. 16:16:35

4 Q Thank you. You had testified earlier -- 16:16:37
5 please correct me if I'm wrong -- that you believe 16:16:38
6 you've known Amber Heard for about five years; is 16:16:40
7 that correct? 16:16:45

8 A That's my best recollection, yes. 16:16:45

9 Q How did you come to meet her? 16:16:47

10 A So I represented her in connection with a 16:16:49
11 prior litigation matter. 16:16:52

12 Q What did that litigation matter involve? 16:16:54

13 A It was a claim by folks involved in a 16:16:57
14 movie called "London Fields." 16:17:03

15 Q Was your client, Ms. Heard, the plaintiff 16:17:06
16 or defendant in that case? 16:17:13

17 A She was the defendant. 16:17:15

18 Q Was that a lawsuit, or an arbitration? 16:17:17

19 A It was a lawsuit, I believe. 16:17:21

20 Q Where was the lawsuit venued -- strike 16:17:27
21 that. 16:17:27

22 Where was that lawsuit against Ms. Heard 16:17:32

1	filed?	16:17:34
2	A I believe it was Los Angeles.	16:17:34
3	Q Who was the plaintiff?	16:17:36
4	A Oh, brother, you're going to have to	16:17:40
5	refresh my recollection. I really just don't	16:17:46
6	recollect.	16:17:49
7	Q In what court was the complaint filed	16:17:50
8	against Ms. Heard?	16:17:52
9	A I'm pretty sure it was LA Superior, or our	16:17:54
10	trial court.	16:17:59
11	Q Do you recall the name of your judge?	16:18:00
12	A No.	16:18:02
13	Q Do you recall the year in which it was	16:18:03
14	filed?	16:18:06
15	A So looking at the documents that were	16:18:06
16	provided today, and seeing the dates therein. I	16:18:11
17	think five years is probably a pretty good	16:18:16
18	estimate. I was not her first counsel of record	16:18:20
19	in that case. I substituted in and it was	16:18:22
20	probably five, up to six years ago.	16:18:26
21	Q For whom did you substitute in?	16:18:28
22	A For Ms. Heard.	16:18:31

1 Q For which firm -- which firm did you 16:18:32

2 replace in that matter? 16:18:37

3 A It was a lawyer named Pierce O'Donnell. 16:18:38

4 Q And what firm is Mr. O'Donnell -- strike 16:18:42

5 that. 16:18:42

6 What firm was Mr. O'Donnell associated 16:18:46

7 with at the time? 16:18:49

8 A I think the Greenberg Glusker firm. 16:18:50

9 Q Do you recall who the plaintiff's law firm 16:18:53

10 was? 16:18:56

11 A Yes. 16:18:57

12 Q Who was the plaintiff's law firm? 16:19:03

13 A Give me just a second, and I'm going to, 16:19:05

14 hopefully, summon that. 16:19:10

15 I think Greenberg Traurig. 16:19:24

16 Q And do you remember the name of any of the 16:19:27

17 attorneys at Greenberg Traurig who were involved? 16:19:31

18 A If you give me a minute, I will. 16:19:36

19 Q Okay. While you're thinking about that, 16:19:39

20 do you recall what counts were brought against 16:19:43

21 Ms. Heard in the action involving London Fields? 16:19:46

22 MS. BREDEHOFT: Objection, hearsay. 16:19:51

1 A I just don't. You need to show me some 16:19:52
2 paper. 16:19:56

3 Q Do you recall how the lawsuit was 16:19:58
4 resolved? 16:20:01

5 MR. SCHWARTZ: Objection. Vague and 16:20:03
6 ambiguous. 16:20:05

7 A I do. And here's where I want to be super 16:20:05
8 careful. I -- it could well be that there was a 16:20:09
9 -- that the resolution was pursuant to a 16:20:18
10 settlement agreement, which is, itself, 16:20:20
11 confidential, so I would just want to make sure, 16:20:23
12 before I spoke about in connection with this 16:20:27
13 proceeding, that I don't run afoul of anything. 16:20:34
14 If we are able to, amongst you and opposing 16:20:37
15 counsel, come to an agreement that this is highly 16:20:47
16 confidential for purposes of this case, so that 16:20:51
17 I'm not violating anything, I think I'm 16:20:53
18 comfortable telling you. 16:20:56

19 Q Well, thank you -- 16:20:59

20 MR. SCHWARTZ: Let me instruct you not to 16:21:00
21 reveal anything that might be confidential or 16:21:03
22 requires notice to an opposing party, subject to 16:21:06

1 the agreement to keep it confidential. 16:21:12

2 BY MR. CHEW: 16:21:12

3 Q Fair enough. Perhaps during a break you 16:21:13

4 might look to see whether that is, in fact, the 16:21:15

5 case, and, during your lunch break, I'll ask you 16:21:18

6 to look at that. 16:21:20

7 MR. CHEW: As I've asked Ms. Bredehoft a 16:21:21

8 couple of hours ago to send me the e-mail from 16:21:23

9 predecessor counsel that I requested -- I haven't 16:21:27

10 seen it yet -- perhaps she can do that during the 16:21:30

11 lunch break as well. 16:21:34

12 MS. BREDEHOFT: Mr. Chew, I have no 16:21:34

13 intention to sending it to you during the 16:21:37

14 deposition. As you've known, as you've known in 16:21:40

15 all of these, I don't go into my computer and my 16:21:42

16 e-mail during depositions. 16:21:47

17 MR. CHEW: You know what, Elaine, I'm not 16:21:48

18 going to waste my three-and-a-half hours, but 16:21:50

19 that's absolutely false, because you told me, off 16:21:53

20 the record, that you would be sending me that 16:21:55

21 e-mail. 16:21:58

22 MS. BREDEHOFT: I told you I would send it 16:21:58

1 to you. You didn't ask me to send it to you 16:22:01
2 during this deposition, and I will send it to you 16:22:06
3 after the deposition. 16:22:07

4 MR. CHEW: You are extremely consistent, 16:22:08
5 and clients often resemble their lawyers. 16:22:11

6 But let's move on. 16:22:14

7 MR. SCHWARTZ: Move to strike all of that. 16:22:16

8 MS. BREDEHOFT: [Indiscernible.] 16:22:21

9 THE WITNESS: Mr. Chew, the name of 16:22:21
10 counsel, Mathew Rosengart, he's the counsel who 16:22:23
11 was representing the plaintiff in the matter that 16:22:30
12 I just mentioned, MA-T-H-E-W, R-O-S-E-N-G-A-R-T. 16:22:32

13 MR. CHEW: Thank you, very much, 16:22:41
14 Mr. George. That's helpful. 16:22:42

15 BY MR. CHEW: 16:22:42

16 Q Now, I take it that, prior to your 16:22:45
17 substituting in as counsel in the matter involving 16:22:48
18 London Fields, you had communicated with her 16:22:51
19 sometime before that; is that true? 16:22:56

20 A Yes. 16:22:59

21 MS. BREDEHOFT: I'm going to object to the 16:22:59
22 extent it calls for attorney-client 16:23:01

1 communications. 16:23:04

2 Please, Mr. George, with any questions 16:23:05

3 that he's asking, give me enough time to now get 16:23:06

4 into objections. In Virginia, we don't object on 16:23:08

5 the basis of relevance. That's assumed, we have 16:23:12

6 the opportunity to raise that later, but I do want 16:23:14

7 the ability to assess and determine if there's 16:23:17

8 anything that might violate attorney-client 16:23:20

9 privileges and be able to assert that. 16:23:22

10 THE WITNESS: As do we, no doubt, and I 16:23:25

11 will apologize for that and try to do better. 16:23:28

12 I'll just note this: That for purposes of 16:23:30

13 that question, which was whether there was 16:23:33

14 communications, and not the substance of those 16:23:35

15 communications, I didn't see any particular issue. 16:23:37

16 So I'll just leave it at that. 16:23:39

17 BY MR. CHEW: 16:23:39

18 Q Well, you didn't answer the question. 16:23:41

19 MR. CHEW: Would you please read back the 16:23:44

20 question.

21 MS. BREDEHOFT: By the way, while they're

22 doing that --

1 MR. CHEW: No, read back the question.

2 By the way nothing, just read back the
3 question.

4 MS. BREDEHOFT: Mr. George, you're out of
5 focus. Is anyone else seeing that?

6 MR. CHEW: Stop interrupting. I didn't
7 interrupt you much. 16:24:21

8 (Whereupon, the previous question was read 16:24:21
9 by the court reporter.) 16:24:21

10 THE WITNESS: And, Ma'am, did you get my 16:24:21
11 answer? 16:24:40

12 BY MR. CHEW: 16:24:40

13 Q You didn't answer. 16:24:40

14 A I said, "yes." 16:24:39

15 Q When did you communicate with Ms. Heard? 16:24:40

16 A I can only say it would have been shortly 16:24:43
17 before that time. 16:24:45

18 Q Who initiated the first communication you 16:24:46
19 had with Ms. Heard? 16:24:53

20 A I don't recollect. It may well have been 16:24:57
21 a third party. 16:25:02

22 Q Who was the third party? 16:25:04

1 A I don't remember specifically. I -- it 16:25:06
2 could well be a transactional lawyer, but I'm 16:25:11
3 really stretching my recollection at this point. 16:25:14
4 Q Was the communication written or oral? 16:25:18
5 A I don't recollect. 16:25:20
6 Q Did you have an engagement letter between 16:25:22
7 your firm and Ms. Heard with respect to the London 16:25:25
8 Fields representation? 16:25:30
9 MS. BREDEHOFT: I'm going to object and 16:25:32
10 assert the attorney-client privilege and instruct 16:25:33
11 him not to answer -- or I can object and assert 16:25:36
12 the attorney-client privilege. I guess your 16:25:39
13 counsel has to tell you whether to answer. 16:25:42
14 MR. SCHWARTZ: I will instruct you not to 16:25:42
15 answer that question. 16:25:43
16 THE WITNESS: Yes. 16:25:43
17 And, obviously, Mr. Chew, I'm going to 16:25:44
18 follow these directives, and if the Court rules 16:25:48
19 differently, I'll be back. 16:25:52
20 BY MR. CHEW: 16:25:52
21 Q Thank you, Mr. George. I appreciate that. 16:25:54
22 You referred to -- strike that. 16:25:56

1 Do you recall, during your testimony in 16:26:00
2 response to questions from Ms. Bredehoft, that you 16:26:03
3 referred to Mr. Depp as being "highly litigious"? 16:26:07

4 A Yes, I said that. 16:26:16

5 Q What were you referring to? 16:26:17

6 A There were pieces of litigation he had 16:26:18
7 brought against, as I recollect, a former manger, 16:26:22
8 I guess a former lawyer, I think it was one other. 16:26:27
9 That's the basis for my saying that. 16:26:31

10 Q What do you know about Mr. Depp's case 16:26:35
11 against his former manager? 16:26:41

12 MR. SCHWARTZ: Objection. Lack of 16:26:42
13 personal knowledge. 16:26:44

14 MS. BREDEHOFT: Calls for hearsay. 16:26:46

15 But go ahead. 16:26:47

16 A So at some point in connection with -- at 16:26:49
17 some point when I represented Ms. Heard, there was 16:26:55
18 a subpoena that was issued to Ms. Heard in 16:27:01
19 connection with that case, so I had some 16:27:10
20 opportunity at that point in time to get to know a 16:27:14
21 little bit about it. 16:27:17

22 And I can anticipate your next question: 16:27:19

1 Did she testify. I really don't recollect what 16:27:24

2 happened with it. 16:27:26

3 Q As you know, lawyers are not supposed to 16:27:26

4 anticipate the questions of other lawyers. 16:27:29

5 A I'm doing exactly what I tell my clients 16:27:31

6 not to. 16:27:36

7 Q And I would do the same thing. 16:27:36

8 But my question is: What do you know 16:27:38

9 about the substance of Mr. Depp's lawsuit against 16:27:41

10 his managers, former managers? 16:27:44

11 MR. SCHWARTZ: Objection. Vague and 16:27:46

12 ambiguous. 16:27:49

13 MS. BREDEHOFT: Also hearsay. 16:27:49

14 MR. SCHWARTZ: And vague as to substance 16:27:52

15 and "managers." 16:27:54

16 MS. BREDEHOFT: It calls for hearsay. 16:27:54

17 Go ahead. 16:27:56

18 A The best I can do is tell you at about 16:27:56

19 that point in time -- in other words, 16:27:59

20 approximately five years ago or so, I had a reason 16:28:02

21 to learn more about each one of those particular 16:28:07

22 suits. Subpoenaed in at least one, possibly a 16:28:11

1 second, and that that was the basis for my view 16:28:18

2 about him being highly litigious. 16:28:20

3 But if you're asking at this point, years 16:28:24

4 later, was it a meritorious suit or not, I can't 16:28:27

5 point to particular facts. 16:28:31

6 Q Do you know whether it was a meritorious 16:28:33

7 suit or not? 16:28:35

8 MR. SCHWARTZ: Objection. Vague as to 16:28:35

9 "meritorious." 16:28:37

10 MS. BREDEHOFT: Objection. Leading. 16:28:38

11 Mr. George, has been co- -- he's been noticed by 16:28:41

12 the -- by Mr. Depp, and therefore it's his witness 16:28:45

13 as well, and you cannot ask a leading question. 16:28:48

14 And I'm objecting to leading, as well as hearsay. 16:28:53

15 MR. CHEW: He's clearly an adverse 16:28:54

16 witness, and he used the word "meritorious," and 16:28:57

17 I'm asking him, one way or the other, whether he 16:28:59

18 has an opinion whether Mr. Depp's lawsuit against 16:29:02

19 his former managers was meritorious. 16:29:05

20 MR. SCHWARTZ: And objection on the basis 16:29:09

21 of opinion. 16:29:10

22 MS. BREDEHOFT: Objection. Hold on. 16:29:11

1 Not only leading, but it's -- it's a 16:29:13
2 hypothetical and calls for a legal conclusion and, 16:29:17
3 potentially, expert testimony -- and it's also 16:29:23
4 hearsay. 16:29:24
5 BY MR. CHEW: 16:29:24
6 Q You may answer. 16:29:25
7 A I don't have an opinion about whether that 16:29:25
8 suit was meritorious. 16:29:27
9 Q So for all you know, it could have been 16:29:29
10 quite meritorious, right? 16:29:32
11 MR. SCHWARTZ: Objection. 16:29:34
12 MS. BREDEHOFT: Objection. Hearsay. 16:29:35
13 Foundation. Hearsay. Calls for speculation. 16:29:36
14 A You are correct. I don't believe I ever 16:29:39
15 said differently. 16:29:42
16 Q Do you know how that case was resolved? 16:29:43
17 A I don't. 16:29:46
18 MS. BREDEHOFT: Objection. Hearsay. 16:29:46
19 Foundation. Calls for speculation. 16:29:49
20 Mr. George, I'm just going to ask you to 16:29:51
21 count to five or something and let me get my 16:29:53
22 objections. 16:29:55

1 BY MR. CHEW: 16:29:55

2 Q Mr. George, you also, as your basis for 16:29:56

3 saying that Mr. Depp was highly litigious, you 16:29:59

4 also mentioned a suit that he filed against his 16:30:04

5 former lawyer; do you remember that? 16:30:09

6 A I do. 16:30:13

7 Q Who was the former lawyer Mr. Depp sued? 16:30:13

8 A Again, I'm sorry. But give me a minute, 16:30:18

9 and I'll remember. It will come to me -- J -- can 16:30:29

10 you help me? 16:30:38

11 Q Have you ever heard the name "Jake Bloom"? 16:30:39

12 A Jake Bloom, yes, that's it. 16:30:42

13 Q Do you know the law firm with which 16:30:44

14 Mr. Bloom used to be associated? 16:30:47

15 A I do. 16:30:49

16 Q And what's name of that law firm? 16:30:49

17 A I think Bloom Hergott. 16:30:53

18 Q That's right. Does that law firm exist 16:30:55

19 anymore? 16:30:58

20 MR. SCHWARTZ: Objection. Lack of 16:30:58

21 personal knowledge. 16:31:00

22 MS. BREDEHOFT: Yeah, objection. Hearsay. 16:31:00

1	Foundation.	16:31:02
2	BY MR. CHEW:	16:31:03
3	Q Do you know whether that law firm even	16:31:03
4	exists anymore?	16:31:06
5	MS. BREDEHOFT: Objection. Leading.	16:31:07
6	Foundation. Hearsay. Calls for speculation.	16:31:09
7	A So I read in a paper that Mr. Bloom was no	16:31:10
8	longer with the firm. I don't know, one way or	16:31:19
9	the other, if the firm continues to exist in,	16:31:22
10	substantially, the same configuration as it had	16:31:26
11	when he was there.	16:31:31
12	Q Isn't it true Bloom Hergott no longer	16:31:32
13	exists because of the meritorious claims Mr. Depp	16:31:36
14	made against him?	16:31:40
15	MS. BREDEHOFT: Objection. Leading,	16:31:41
16	hearsay. Foundation. Calls for speculation.	16:31:44
17	Argumentative.	16:31:44
18	Go ahead.	16:31:47
19	A I would never say that.	16:31:47
20	Q Why would you "never" say that?	16:31:49
21	A Because I don't have an opinion about	16:31:51
22	that.	16:31:53

1 Q Have you read the opinion -- do you know 16:31:53
2 who Judge Green is in the Los Angeles County 16:31:55
3 Superior Court? 16:32:00
4 A I do. 16:32:00
5 Q Have you read any opinions that 16:32:01
6 Judge Green issued in Mr. Depp's case against 16:32:04
7 Bloom Hergott? 16:32:07
8 MS. BREDEHOFT: Objection. Calls for 16:32:09
9 hearsay. Foundation. Leading. 16:32:11
10 Go ahead. 16:32:12
11 A No. 16:32:13
12 Q Your testimony is, under oath, sitting 16:32:15
13 here today, you never heard anything about 16:32:17
14 Judge Green's opinion in validating Mr. Bloom's 16:32:21
15 alleged oral contract? 16:32:27
16 MR. SCHWARTZ: Objection. 16:32:28
17 MS. BREDEHOFT: Hearsay. Foundation. 16:32:29
18 Leading. 16:32:31
19 MR. SCHWARTZ: And misleading the 16:32:34
20 witness's testimony. 16:32:35
21 A You did, I'm sure, inadvertently. You 16:32:37
22 just misstated your prior question. Have I heard 16:32:41

1 about it? Yes. 16:32:44

2 Your prior question was: Have I read it. 16:32:45

3 I don't believe I ever have. 16:32:48

4 Q What have you heard about it? 16:32:51

5 MS. BREDEHOFT: Objection. Calls for 16:32:52

6 hearsay. Foundation. Speculation. 16:32:54

7 MR. SCHWARTZ: And, to the extent 16:32:56

8 necessary, I'll instruct the witness not to answer 16:32:57

9 any questions that -- answer with any 16:33:00

10 communications that might have arisen in the scope 16:33:02

11 of attorney-client relationship. 16:33:05

12 THE WITNESS: That's okay. I can answer 16:33:08

13 it. 16:33:10

14 The issue was one, maybe particular to 16:33:10

15 California law, about the requirement that any 16:33:13

16 contingency fee representation be accompanied by 16:33:20

17 certain -- not only in writing, but accompanied by 16:33:24

18 certain disclosures and whether that extends to 16:33:30

19 entertainment counsel. That's the issue, as I 16:33:34

20 understand it. But beyond that issue, I don't 16:33:38

21 know how that was applied in this particular case. 16:33:41

22 Q Are you aware of how Judge Green applied 16:33:45

1	that as to Mr. Bloom's alleged oral contract?	16:33:49
2	MS. BREDEHOFT: Objection. Calls for	16:33:52
3	hearsay. Foundation.	16:33:54
4	Go ahead.	16:33:55
5	A No.	16:33:56
6	Q Well, I want to represent to you that he	16:33:59
7	found it to be illegal, applying Section 6147 of	16:34:01
8	the code with which you, as a fellow of the	16:34:07
9	American College of Trial Lawyers, is intimately	16:34:10
10	familiar.	16:34:13
11	MS. BREDEHOFT: Objection. Hearsay.	16:34:13
12	Foundation. Argumentive. Calls for a	16:34:15
13	hypothetical. Speculation.	16:34:19
14	MR. SCHWARTZ: And there's no question.	16:34:22
15	Move to strike.	16:34:24
16	MR. CHEW: If you could, please open up,	16:34:27
17	for Mr. George, our Exhibit 13.	16:34:34
18	THE TECHNICIAN: Mr. Chew, I have 10	16:34:49
19	exhibits for you sir. Maybe I didn't get them	16:34:52
20	all. I can check now.	16:34:55
21	MR. CHEW: Well, I think you're missing a	16:34:58
22	few of them. We should have 14.	16:35:00

1	THE TECHNICIAN: My apologies. Please	16:35:03
2	just give me one moment.	16:35:07
3	MS. VASQUEZ: They were recently uploaded.	16:35:18
4	THE TECHNICIAN: I missed that.	16:35:22
5	MR. CHEW: So you should have 11, 12, 13,	16:35:23
6	and 14, and what I'm trying to show Mr. George,	16:35:27
7	now is Exhibit 13.	16:35:30
8	THE TECHNICIAN: I've received that	16:36:17
9	exhibit, and I'll retrieve the others, I'm not	16:36:19
10	seeing an Exhibit 11. I'll just take this	16:36:23
11	opportunity to say that.	16:36:26
12	MR. CHEW: Well, you know what we'll do,	16:36:28
13	Alex, when we break for lunch in 20 or 30 minutes,	16:36:29
14	whenever Mr. George's salad comes, Camille will	16:36:35
15	give you a call and we'll make sure we're on the	16:36:35
16	same page.	16:36:38
17	So let's go to Exhibit 13 now and make	16:36:39
18	some progress.	16:36:42
19	THE TECHNICIAN: Understood.	16:36:44
20	(Whereupon, the above-referenced document	16:36:44
21	was remarked as Exhibit No. 46.)	16:36:46
22	BY MR. CHEW:	16:36:46

1 Q Mr. George, have you ever seen this 16:36:47
2 document before? And take your time, please. 16:36:48
3 MS. BREDEHOFT: Sorry, which exhibit is 16:36:58
4 this? 16:37:01
5 MR. CHEW: Exhibit 13. 16:37:02
6 THE WITNESS: (Speaking to technician.) 16:37:04
7 Slow down a little bit, sir, and stop right there. 16:37:04
8 Perfect. 16:37:07
9 A Yes, I have. 16:37:25
10 Q What is it, sir? 16:37:27
11 A It is a cover letter accompanying an 16:37:28
12 arbitration demand. 16:37:35
13 Q And is that your signature that appears on 16:37:36
14 the cover letter? 16:37:39
15 A It is. 16:37:41
16 Q Did you send this to Mr. Edward Weitz, on 16:37:42
17 or about October 12, 2018? 16:37:50
18 A I instructed my firm to do so. 16:37:52
19 Q Why did you send it to Mr. Weitz, and not 16:37:54
20 Mr. Depp's lawyer? 16:37:58
21 A I can only answer, generally, that we 16:38:00
22 would not have known -- well, let me put it this 16:38:08

1 way. If we didn't know, with certainty, that a 16:38:12
2 particular lawyer was representing Mr. Depp for a 16:38:16
3 particular matter, then it would be my practice to 16:38:20
4 send it to a general representative or to the 16:38:24
5 party themselves. But beyond that, I just can't 16:38:28
6 tell you. 16:38:34

7 Q At the time you sent the letter to 16:38:34
8 Mr. Weitz, who did you understand Mr. Weitz to be 16:38:37
9 in relation to Johnny Depp? 16:38:40

10 MR. SCHWARTZ: Objection. Lack of 16:38:43
11 foundation. 16:38:45

12 MS. BREDEHOFT: Calls for hearsay. 16:38:45
13 Speculation. 16:38:46

14 But go ahead. 16:38:47

15 A I can only tell you that, literally, the 16:38:48
16 entirety of my answer here is that he is 16:38:51
17 referenced as being a CPA. So that he would be -- 16:38:54
18 I'm gathering, from looking at this letter, that 16:38:59
19 we understood, at the time, that he was a CPA for 16:39:03
20 Mr. Depp. 16:39:08

21 Q At the time -- putting aside the divorce 16:39:09
22 proceedings between Ms. Heard and Mr. Depp, had 16:39:13

1 Mr. Depp ever initiated any legal action, be it a 16:39:16
2 lawsuit, arbitration, or demand against your, 16:39:21
3 then-client, Amber Heard? 16:39:24

4 MS. BREDEHOFT: Objection. Leading. 16:39:26
5 Hearsay. Foundation. Speculation. 16:39:27

6 Go ahead. 16:39:29

7 A We -- will you say that again at the 16:39:30
8 beginning, you said putting aside what? 16:39:35

9 Q Putting aside the divorce case, had there 16:39:38
10 ever been any litigation or arbitration between 16:39:42
11 your former client, Amber Heard, and Johnny Depp? 16:39:45

12 A Not that I recollect. 16:39:49

13 MS. BREDEHOFT: Objection. 16:39:51

14 THE WITNESS: I'm sorry. Ms. Bredehoft, I 16:39:53
15 didn't catch your objection. 16:39:55

16 MS. BREDEHOFT: It was leading. Hearsay 16:39:57
17 and foundation. Calls for speculation. 16:39:58

18 THE WITNESS: As I sit here today, not 16:40:01
19 that I recollect. 16:40:03

20 BY MR. CHEW: 16:40:04

21 Q It is fair to say that you and your client 16:40:05
22 fired the first shot, true? 16:40:10

1 MR. SCHWARTZ: Objection. Misstates his 16:40:12
2 testimony. Argumentative. 16:40:14

3 MS. BREDEHOFT: Yeah, and hearsay. 16:40:15
4 Leading. Foundation. Calls for speculation. 16:40:18

5 You may answer. 16:40:20

6 A No. 16:40:20

7 Q Why is it not true? 16:40:21

8 A Look at the letter itself. 16:40:23

9 Q Is this a love tap? 16:40:24

10 MS. BREDEHOFT: Objection. Argumentative. 16:40:27

11 MR. SCHWARTZ: I don't want -- 16:40:30

12 MS. BREDEHOFT: [Indiscernible.] Hearsay. 16:40:33

13 BY MR. CHEW: 16:40:33

14 Q Let's look to the attachment. Was this 16:40:36
15 arbitration demand filed by Amber Heard against 16:40:39
16 Mr. Depp? What is that? 16:40:44

17 A Look at the second paragraph referencing 16:40:46
18 any further public statements that Mr. Depp or his 16:40:50
19 agents may make about Ms. Heard. I think that 16:40:53
20 speaks for itself. 16:40:56

21 Q What is the -- please describe for us what 16:40:57
22 you intended to convey as Ms. Depp's arbitration 16:41:02

1 demand against Mr. Depp? 16:41:10

2 MR. SCHWARTZ: Objection. Vague and 16:41:12

3 ambiguous as to "convey" with an arbitration 16:41:15

4 demand. That document certainly speaks for 16:41:18

5 itself, and, you know, lack of foundation that 16:41:21

6 Mr. George is, or anyone is speaking through an 16:41:23

7 arbitration demand. 16:41:28

8 MS. BREDEHOFT: Right. I'm going to join 16:41:29

9 that with hearsay, leading, and lack of 16:41:32

10 foundation. 16:41:34

11 You may answer. 16:41:34

12 BY MR. CHEW: 16:41:35

13 Q You may answer. 16:41:35

14 A The letter specifically states that we 16:41:36

15 will regard, "...any further public statements 16:41:40

16 that Mr. Depp or his agents may make about 16:41:41

17 Ms. Heard as grounds for," and it goes on. So to 16:41:46

18 your question about firing the first shot, I think 16:41:49

19 that answers it. 16:41:52

20 Q Let me direct your attention to page 4 of 16:41:53

21 the arbitration demand. Do you see that, sir? 16:41:58

22 A I do. 16:42:02

1 Q Actually, I don't think he's got page 4 of 16:42:03

2 the demand in front of you. It's further on. 16:42:10

3 Okay. That's it. So page 4. Numbers -- 16:42:13

4 page 4 on the bottom. That's it. 16:42:17

5 Is that your signature that appears there 16:42:20

6 above your signature line? 16:42:23

7 A It is. 16:42:24

8 Q You and your client state, "Wherefore, 16:42:25

9 client prays for judgment against respondents as 16:42:29

10 follows: One, for an award to claimant of actual 16:42:32

11 compensatory damages in an amount to be determined 16:42:41

12 by the trier of fact; two, for an award of 16:42:44

13 punitive damages for respondent's intentional 16:42:50

14 malicious and oppressive conduct in an amount to 16:42:51

15 be determined by the trier of fact; three, for 16:42:54

16 pre- and post-judgment interest as permitted by 16:42:58

17 applicable law; four, for any such other and 16:43:00

18 further relief as the trier of fact determines to 16:43:05

19 be just and proper." 16:43:07

20 Did I accurately read your client's 16:43:09

21 demand? 16:43:13

22 MR. SCHWARTZ: Objection [indiscernible] 16:43:13

1 document. 16:43:13

2 MS. BREDEHOFT: Objection, hearsay. 16:43:13

3 Leading. Foundation. Not best evidence. 16:43:17

4 Document speaks for itself, and misstates the 16:43:19

5 document. 16:43:22

6 BY MR. CHEW: 16:43:22

7 Q Did I accurately read that, sir? 16:43:22

8 A Yes. 16:43:25

9 Q Was that a meritorious claim? 16:43:25

10 MR. SCHWARTZ: Objection, calls for a 16:43:34

11 legal conclusion. 16:43:40

12 MS. BREDEHOFT: Yeah, calls for a legal 16:43:40

13 conclusion. Hearsay. Leading. Foundation. 16:43:42

14 BY MR. CHEW: 16:43:42

15 Q We've been talking about meritorious 16:43:44

16 claims all day long. Was that a meritorious 16:43:46

17 claim? 16:43:50

18 MS. BREDEHOFT: Same objections. 16:43:50

19 A Yes. 16:43:51

20 Q How was it resolved -- or, strike that. 16:43:51

21 How did Mr. Depp's -- how did Mr. Depp 16:43:55

22 respond to Ms. Heard's arbitration demand, 16:43:59

1 Exhibit 13? 16:44:02

2 MR. SCHWARTZ: Objection. Calls for 16:44:03

3 speculation, lack of personal knowledge. 16:44:04

4 MS. BREDEHOFT: Yeah, objection. Hearsay, 16:44:05

5 leading, foundation, and speculation. 16:44:08

6 Go ahead. 16:44:09

7 A There was an issue raised about whether 16:44:10

8 the parties had complied with the requisite 16:44:12

9 procedures to have any such arbitration claims 16:44:20

10 properly before a judge pro tem. So for 16:44:31

11 procedural reasons, this was found not to properly 16:44:36

12 be before the judge pro tem who we brought this 16:44:41

13 before. 16:44:45

14 Q Isn't it true that Mr. Depp filed a motion 16:44:46

15 to dismiss? 16:44:49

16 MS. BREDEHOFT: Objection. Hearsay, 16:44:50

17 leading, foundation, calls for speculation, not 16:44:51

18 best evidence. 16:44:53

19 Go ahead. 16:44:54

20 A I don't recollect the title of it, but he 16:44:55

21 did file a motion for exactly -- raising exactly 16:44:58

22 the claim that I just mentioned. 16:45:04

1 Q Who adjudicated Mr. Depp's motion to 16:45:07

2 dismiss? 16:45:10

3 MS. BREDEHOFT: Objection. Calls for 16:45:11

4 hearsay. Leading. Foundation. Speculation. Not 16:45:13

5 best evidence. 16:45:16

6 Go ahead. 16:45:16

7 A Again, I believe it was the judge pro tem, 16:45:17

8 a man named Judge Meisinger, Lou Meisinger. 16:45:21

9 Q And is it true that Judge Meisinger 16:45:29

10 dismissed Ms. Heard's arbitration demands 16:45:33

11 summarily? 16:45:37

12 MS. BREDEHOFT: Objection. Leading. 16:45:37

13 Hearsay. Foundation. Speculation. 16:45:38

14 Go ahead. 16:45:40

15 A Again, not on the merits, but precisely 16:45:41

16 because there was a question about whether the 16:45:45

17 parties stipulated to have these particular 16:45:47

18 disputes heard before him. 16:45:50

19 Q Did Judge Meisinger throw out Ms. Heard's 16:45:52

20 arbitration demand, "yes," or "no"? 16:45:56

21 MS. BREDEHOFT: Objection. Leading. 16:45:59

22 Hearsay. Foundation. Not best evidence. 16:46:01

1 Speculation, and argumentative. 16:46:02

2 A You're misconstruing a decision based on a 16:46:05

3 procedural ground, and trying to suggest that it 16:46:11

4 was based on a substantive ground. And I'm 16:46:14

5 telling you that Judge Meisinger determined that 16:46:17

6 the parties had not properly dotted there is and 16:46:20

7 crossed their Ts with respect to designating him, 16:46:25

8 personally, as the judge pro tem; and, therefore, 16:46:29

9 he could not exercise jurisdiction over the claim. 16:46:32

10 There was nothing that he did that addressed the 16:46:36

11 merits of the claim. 16:46:38

12 Q Motions to dismiss are granted oftentimes 16:46:42

13 not on the merits. Did he or did he not dismiss 16:46:44

14 Ms. Heard's demand for arbitration? 16:46:50

15 MR. SCHWARTZ: Objection. Asked and 16:46:52

16 answered. 16:46:53

17 MS. BREDEHOFT: Yeah, asked and answered, 16:46:53

18 and also objection to the form of the question. 16:46:54

19 It's very argumentative and inappropriate. 16:46:57

20 Hearsay. Leading. Foundation. And calls for 16:47:00

21 speculation. 16:47:00

22 BY MR. CHEW: 16:47:00

1 Q You may answer. Dismissed, or not 16:47:03

2 dismissed? 16:47:05

3 A So again, I don't remember whether it was 16:47:05

4 a motion to dismiss or if it was titled 16:47:08

5 differently, but the effect of what 16:47:11

6 Judge Meisinger did was to say that he would not 16:47:16

7 entertain this dispute. So it may well have been 16:47:19

8 a dismissal, but I don't remember the exact words 16:47:23

9 of it and what the particular relief was. 16:47:26

10 Q Did he conduct the arbitration that your 16:47:29

11 client, Ms. Heard, demanded? 16:47:33

12 MS. BREDEHOFT: Objection. Leading. 16:47:35

13 Hearsay. Foundation. Calls for speculation. Not 16:47:37

14 best evidence. 16:47:42

15 Go ahead. 16:47:42

16 A No, that was my point. There are no -- 16:47:43

17 Q It was a yes-or-no question. 16:47:48

18 MS. BREDEHOFT: No, I'm going to object. 16:47:49

19 you can't ask a yes-or-no if that's -- form of the 16:47:51

20 question. 16:47:51

21 Q Mr. George -- 16:47:57

22 MS. BREDEHOFT: And it's leading because 16:47:58

1 [indiscernible]. 16:47:58

2 MR. CHEW: Are you kidding me? 16:48:02

3 MR. SCHWARTZ: You didn't cross-notice 16:48:04

4 this deposition. 16:48:06

5 MS. BREDEHOFT: He did. He cross-noticed 16:48:06

6 it so he has the ability. 16:48:09

7 BY MR. CHEW: 16:48:09

8 Q Did -- 16:48:13

9 MR. CHEW: Excuse me. 16:48:13

10 Q Did Judge Meisinger award your client any 16:48:15

11 compensatory damages? 16:48:20

12 MS. BREDEHOFT: Objection. Hearsay, 16:48:21

13 leading, foundation, it's a hypothetical and not 16:48:23

14 best evidence. Calls for speculation. 16:48:26

15 A Again -- 16:48:28

16 Q "Yes," or "no," sir. 16:48:31

17 MS. BREDEHOFT: Objection. You may not 16:48:32

18 badger the witness. You may not demand a "yes" or 16:48:34

19 "no." That is not appropriate in Virginia courts, 16:48:37

20 and you know it. Objection to the form of the 16:48:39

21 question. 16:48:42

22 BY MR. CHEW: 16:48:42

1 Q Did he award compensatory damages to your 16:48:42

2 client, "yes," or "no"? 16:48:47

3 MS. BREDEHOFT: Objection. Asked and 16:48:47

4 answered. Leading. Hearsay. Foundation. Not 16:48:48

5 best evidence. 16:48:50

6 A Again, as I've explained, there was no 16:48:51

7 hearing; and, therefore, there was no adjudication 16:48:56

8 in favor of or against my client on the merits. 16:48:59

9 Q Did he award any punitive damages to 16:49:03

10 Ms. Heard? 16:49:06

11 MR. SCHWARTZ: Asked and answered. 16:49:06

12 MS. BREDEHOFT: Objection. Leading. 16:49:06

13 Hearsay. Foundation. Not best evidence. And 16:49:08

14 asked and answered and argumentative. 16:49:13

15 BY MR. CHEW: 16:49:15

16 Q Please answer the question: Did he award 16:49:15

17 punitive damages to your client, or not? 16:49:18

18 MS. BREDEHOFT: Objection. Leading. 16:49:20

19 Hearsay. Foundation. Not best evidence. 16:49:22

20 Argumentative. Asked and answered. 16:49:24

21 A So for the reasons I've explained, as 16:49:26

22 there was no hearing whatsoever since, for 16:49:29

1 procedural reasons, the matter was not before him, 16:49:33
2 there was no award of punitive damages or any 16:49:36
3 other relief for either side in the proceeding. 16:49:39

4 Q What communications, if any, did you have 16:49:43
5 with Ms. Heard about Judge Meisinger's decision 16:49:45
6 throwing out her demand for arbitration? 16:49:51

7 MS. BREDEHOFT: I'm going to object. Let 16:49:53
8 me object first. Calls for attorney-client 16:49:56
9 communication, so I'm invoking the attorney-client 16:49:59
10 communications. 16:50:02

11 MR. SCHWARTZ: And I will instruct the 16:50:02
12 witness not to answer for that reason, and also 16:50:03
13 for attorney work product protection. 16:50:05

14 MR. CHEW: All right. Let me make a 16:50:05
15 record because we are, as Mr. George aptly 16:50:10
16 predicted, we are going back to the Court. So I 16:50:13
17 will ask the questions, and Mr. George will wait 16:50:16
18 for you to instruct. 16:50:19

19 BY MR. CHEW: 16:50:19

20 Q Did you have any oral communications with 16:50:20
21 Ms. Heard relating to the demand for arbitration 16:50:22
22 and the results of that as reflected in 16:50:25

1	Exhibit 13?	16:50:28
2	MS. BREDEHOFT: Objection. That calls for	16:50:29
3	attorney-client communications. It's also	16:50:31
4	hearsay. Leading. Foundation. And not best --	16:50:34
5	but anyway. That's enough. But the	16:50:39
6	attorney-client communication is paramount.	16:50:42
7	MR. CHEW: Are you instructing him not to	16:50:44
8	answer? "Yes" or "no."	16:50:46
9	MR. SCHWARTZ: I am instructing the	16:50:47
10	witness not to answer.	16:50:49
11	MR. CHEW: Thank you.	16:50:50
12	BY MR. CHEW:	16:50:53
13	Q Mr. George, did you, or anyone at your	16:50:54
14	firm, have any written communications with	16:50:56
15	Ms. Heard about --	16:50:58
16	MR. SCHWARTZ: Let me clarify. Ben, is	16:50:58
17	your question were there communications, or what	16:50:58
18	was the communications?	16:51:01
19	MR. CHEW: I need to set it up. But I'll	16:51:03
20	do it again.	16:51:05
21	MR. SCHWARTZ: Okay.	16:51:06
22	BY MR. CHEW:	16:51:07

1 Q Were there any oral communications between 16:51:08
2 yourself, or anyone at your firm, and Ms. Heard 16:51:10
3 with respect to the arbitration demand reflected 16:51:13
4 in Exhibit 13? 16:51:17

5 MS. BREDEHOFT: Because he has the content 16:51:18
6 in there, it is calling for attorney-client 16:51:21
7 communications and I am invoking the 16:51:25
8 attorney-client communication. I'm also invoking 16:51:27
9 hearsay and foundation, as well, and leading. 16:51:29

10 MR. CHEW: Are you instructing him not to 16:51:33
11 answer that question? 16:51:35

12 MR. SCHWARTZ: Not as I understand the 16:51:36
13 question, which is asking as to the existence of 16:51:37
14 communications. 16:51:41

15 MS. BREDEHOFT: Well, but here's the part 16:51:44
16 of that, Mr. Schwartz, and that is, he gave the 16:51:44
17 subject matter. In Virginia, when you have 16:51:48
18 communication and you give the subject matter of 16:51:51
19 the communication, you [indiscernible] -- 16:51:53

20 MR. CHEW: This is my time, okay? You can 16:51:56
21 instruct him not to answer, but you've got to 16:51:58
22 settle your hash on your own time. 16:52:00

1 MR. SCHWARTZ: Out of an abundance of 16:52:02
2 caution, given that you've loaded the question 16:52:06
3 with the context of what the advice might have 16:52:07
4 been concerning, I'm going to instruct the witness 16:52:10
5 not to answer. 16:52:11
6 BY MR. CHEW: 16:52:13
7 Q Did you have any written communications 16:52:13
8 with Ms. Heard with respect to the subject matter 16:52:16
9 of Exhibit 13, her arbitration demand against 16:52:18
10 Johnny Depp? 16:52:22
11 MS. BREDEHOFT: All right. And, again, 16:52:23
12 because, it is asking for the content of the 16:52:25
13 communications, it is asking for attorney-client 16:52:29
14 communications, and I'm -- I can't instruct him 16:52:31
15 not to answer, but I am invoking the 16:52:33
16 attorney-client privilege on behalf of Amber 16:52:36
17 Heard. I'm also objecting on leading, hearsay, 16:52:39
18 and foundation. 16:52:42
19 MR. SCHWARTZ: And I will instruct the 16:52:42
20 witness not to answer, and also object on the 16:52:44
21 basis of attorney work product protection. 16:52:45
22 MR. CHEW: So let's make the record. 16:52:48

1	BY MR. CHEW:	16:52:48
2	Q What was the substance of your written	16:52:50
3	communications with Ms. Heard on the arbitration	16:52:52
4	matter reflected in Exhibit 13?	16:52:55
5	MS. BREDEHOFT: Objection, and I'm	16:52:57
6	objecting on the basis of it calls for	16:52:59
7	attorney-client communications, and I'm invoking	16:53:02
8	the attorney-client privilege on behalf of Amber	16:53:05
9	Heard. I'm also objecting on hearsay, foundation,	16:53:08
10	and not best evidence, speculation.	16:53:12
11	MR. SCHWARTZ: I'm objecting on the basis	16:53:14
12	of the attorney work product protection. I'm	16:53:16
13	going to instruct the witness not to answer on the	16:53:19
14	basis of that objection, as well as the	16:53:22
15	attorney-client privilege by Ms. Heard since	16:53:23
16	you're asking for communications between an	16:53:27
17	attorney and his client regarding legal advice the	16:53:29
18	client has sought.	16:53:33
19	BY MR. CHEW:	16:53:35
20	Q All right. Mr. George, you testified at	16:53:35
21	the beginning of your deposition that you had	16:53:38
22	experience litigating defamation cases. I just	16:53:42

1 wanted to follow-up on that. 16:53:46

2 In how many defamation cases, that is, 16:53:50

3 cases that have been filed in a state or federal 16:53:52

4 court, have you been first chair for the 16:53:56

5 plaintiff? 16:54:00

6 MR. SCHWARTZ: Objection. Vague as to 16:54:01

7 "first chair." 16:54:03

8 MS. BREDEHOFT: Yeah. Objection. 16:54:04

9 Hearsay. Foundation. 16:54:06

10 But go ahead. 16:54:08

11 A At least two. 16:54:10

12 Q Which cases were they? 16:54:33

13 A So one I can address, because it became 16:54:34

14 public, and the other one, I cannot. The one that 16:54:40

15 was public, I represented a man named 16:54:44

16 Michael Arrington, A-R-R-I-N-G-T-O-N. 16:54:48

17 Q Where did you and Mr. Arrington file that 16:54:57

18 complaint? 16:55:01

19 A It was in Northern California, and it was 16:55:03

20 in state court. I don't know which particular 16:55:09

21 county, it may have been Santa Clara, it may have 16:55:17

22 been San Francisco. 16:55:23

1 Q What year did you file the case? 16:55:23

2 MS. BREDEHOFT: Objection, calls for 16:55:29

3 hearsay. Foundation. 16:55:31

4 Go ahead. 16:55:33

5 A Probably about 11 or 12 years ago. 16:55:33

6 Q What was the name of the defendant? 16:55:38

7 A I believe her first name was Jen or 16:55:40

8 Jennifer, and I'm drawing a blank on the last 16:55:59

9 name. 16:56:02

10 Q Did the case go to trial? 16:56:03

11 A No. 16:56:05

12 Q Was it resolved on a dispositive motion? 16:56:06

13 A No. 16:56:12

14 MS. BREDEHOFT: Objection. Leading. 16:56:13

15 Hearsay. Foundation. 16:56:14

16 Go ahead. 16:56:16

17 BY MR CHEW: 16:56:17

18 Q Was the case settled? 16:56:17

19 A It was. 16:56:19

20 Q What were the terms of the settlement? 16:56:19

21 MR. SCHWARTZ: Objection on the basis of 16:56:22

22 confidentiality, and I'll just instruct my client 16:56:24

1 not to reveal the contents of any agreements that 16:56:26
2 are required, as a matter of the agreement, to be 16:56:31
3 kept confidential. 16:56:33

4 MS. BREDEHOFT: Objection. Calls for 16:56:34
5 speculation. Not best evidence. Speculation. 16:56:36

6 BY MR. CHEW: 16:56:38

7 Q Were the terms of the settlement agreement 16:56:38
8 confidential? 16:56:40

9 MS. BREDEHOFT: Objection. Leading. 16:56:41
10 Hearsay. Foundation. 16:56:42

11 A I don't know, and I would be glad to do 16:56:44
12 what we offered to do with respect to the other 16:56:47
13 matter. We'll take a look and let you know. 16:56:50

14 Q I would really appreciate that. 16:56:52

15 Thank you very much, Mr. George. 16:56:54

16 A Yes. 16:56:56

17 Q With respect to the second of two cases in 16:56:57
18 which you've served as first chair for a plaintiff 16:56:59
19 in a defamation case, where did you and your 16:57:03
20 client file that complaint? 16:57:07

21 A I'm not thinking of a matter that was 16:57:09
22 filed, but one that was able to be resolved prior 16:57:12

1 to being filed. 16:57:15

2 And I should say, Mr. Chew, I'm not 16:57:17

3 suggesting that there hasn't be others where I 16:57:19

4 represented the plaintiff's side, they're just not 16:57:22

5 coming to mind at this point. 16:57:27

6 Q But sitting here today, without going back 16:57:29

7 through your files, you can only remember one case 16:57:31

8 11 or 12 years ago, in which you first chaired a 16:57:34

9 defamation case for a plaintiff; is that correct? 16:57:39

10 A Yes. 16:57:41

11 MS. BREDEHOFT: Objection. Leading. 16:57:42

12 BY MR. CHEW: 16:57:45

13 Q Okay. Let's go to defending a defamation 16:57:46

14 case. On how many defamation cases have you 16:57:49

15 served as first chair? 16:57:53

16 A So I'm a little uncomfortable with "first 16:57:58

17 chair" to the extent that we get into a situation 16:58:03

18 where there are, for example, local counsel, but 16:58:06

19 why don't I just state, if you're comfortable with 16:58:12

20 my saying "lead counsel" from the standpoint of my 16:58:15

21 firm. 16:58:18

22 Q Absolutely. That's really what I mean. I 16:58:18

1 mean, oftentimes you have local counsel. So for 16:58:22
2 example, I will, for purposes of this question, I 16:58:26
3 would say that you were lead counsel for Amber 16:58:29
4 Heard for the first phase of the case. 16:58:33
5 A Perfect. We're on the same page. 16:58:36
6 Gosh, let me give you my caveat, before I 16:59:02
7 give you my answer. 16:59:04
8 Q Fair enough. 16:59:05
9 A What I'm struggling with, a little bit, is 16:59:06
10 how many cases are ones where, for example, I may 16:59:08
11 have filed an anti-SLAPP motion, but it turns out 16:59:12
12 that one of the claims was defamation and, maybe, 16:59:16
13 it was accompanied by nondefamation claims. So in 16:59:23
14 other words, is it really a case that I would 16:59:29
15 characterize as one for defamation? 16:59:31
16 But with that caveat, let me just say, I 16:59:35
17 can generally -- I generally say, in the last 16:59:41
18 dozen years, three, four cases, probably. 16:59:45
19 Q And where were those cases venued? 16:59:50
20 A One is Delaware. 16:59:56
21 Q Let's stop you there. I don't want to 17:00:07
22 interrupt your answer, but I want to do this as 17:00:10

1 expeditiously as possible. 17:00:13

2 Who is the client you were defending in 17:00:16

3 the Delaware case? 17:00:19

4 A It's a pending case, Mr. Chew, and -- I 17:00:19

5 want to be extremely careful and sensitive about 17:00:24

6 not getting into anything dealing with that. I'm 17:00:28

7 much more comfortable telling you about any 17:00:34

8 already adjudicated case. 17:00:37

9 Q I will be respectful of that, but I think 17:00:40

10 if you could just give us the name of the 17:00:42

11 plaintiff and defendant, that would enable us to 17:00:44

12 access the complaint and see what it says. 17:00:48

13 MS. BREDEHOFT: I would object. Hearsay. 17:00:52

14 Foundation. Super, super not relevant, but that's 17:00:54

15 subject later. Anyway -- okay. 17:01:02

16 MR. CHEW: Your client has asserted an 17:01:08

17 advice of counsel defense, and your client has 17:01:10

18 proffered himself as a defamation lawyer, so I 17:01:14

19 don't think of anything more relevant to ask. 17:01:18

20 BY MR. CHEW: 17:01:18

21 Q So who was the plaintiff and who was the 17:01:21

22 defendant in the Delaware case? 17:01:23

1 A So let me, simply, say this: I don't have 17:01:24
2 any problem identifying the case for which I am 17:01:27
3 counsel of record, and it's available to you or 17:01:32
4 any other member of the public for taking a look 17:01:36
5 at, but I have to be clear it would be totally 17:01:39
6 inappropriate for me to comment beyond that. 17:01:44

7 Q That's fine. I don't -- all I need from 17:01:46
8 you is the name of the plaintiff, the name of the 17:01:48
9 defendant, and the name of the court, and the name 17:01:51
10 of the year in which it was filed. 17:01:54

11 A Sure. So I'm defending a defamation suit 17:01:58
12 that was brought by Michael Avenatti. 17:02:02

13 Q I've heard of him. 17:02:06

14 A I had a feeling you might have. 17:02:07

15 Q Who is your client in that? 17:02:10

16 A Fox News and individual reporters. 17:02:13

17 Q Okay. I think we can find that. 17:02:20

18 Would that have been filed in the last two 17:02:22
19 years? 17:02:24

20 A Within the last one year. 17:02:24

21 Q Okay. Now, we've got three more. If you 17:02:26
22 could, please, just let us know the other three in 17:02:30

1 which you've been first chair in defamation cases. 17:02:32

2 A So I'm sorry for these long pauses, but 17:02:38

3 this is really going into my memory banks here. 17:02:56

4 There was a matter, LA Superior Court, 17:03:09

5 where I represented a woman named Zetta, 17:03:14

6 Z-E-T-T-A, Graff, G-R-A-F-F, who was a defendant 17:03:20

7 in a defamation suit. 17:03:23

8 Q Who was the plaintiff in that case? 17:03:28

9 A It was an individual, and I don't 17:03:31

10 specifically recollect. 17:03:35

11 Q And do you recall what year your client 17:03:36

12 was sued? 17:03:38

13 A I think eight, 10 years ago would be the 17:03:39

14 general time frame. 17:03:45

15 Q Do you recall, did it go to trial? 17:03:45

16 A No. We were involved in the first portion 17:03:48

17 of it, and I don't -- I think there was successor 17:03:53

18 counsel, and I don't know how that matter resolved 17:03:57

19 itself. 17:03:59

20 Q All right. Let's go to the third case. 17:04:00

21 Who did you represent in the third case? 17:04:02

22 A I am having a tough time here, because I'm 17:04:05

1 thinking of a matter where there was -- an 17:04:34
2 anti-SLAPP motion that was brought by the other 17:04:41
3 side, and I just can't remember if the claim that 17:04:47
4 my clients had brought included a defamation 17:04:53
5 claim, which goes back to your prior question or 17:05:01
6 two, Mr. Chew, about matters where I was on the 17:05:08
7 plaintiff side. 17:05:09

8 But I represented Kanye West and 17:05:10
9 Kim Kardashian, and there was an adjudication on 17:05:15
10 an anti-SLAPP motion that went up to the court of 17:05:22
11 appeal on the same. We prevailed on it, and the 17:05:26
12 case settled shortly thereafter. 17:05:30

13 But I want to emphasize it may well be 17:05:32
14 that there was no defamation claim involved, but 17:05:36
15 it's just as likely there was. It was too many 17:05:40
16 years ago and I've forgotten, frankly. 17:05:44

17 Q Mr. George, who was the plaintiff in that 17:05:46
18 case? 17:05:49

19 A My clients, Mr. West and Ms. Kardashian. 17:05:49

20 Q So I'm still looking for some help on 17:05:54
21 cases where you were the first chair defending 17:05:58
22 defamation cases. 17:06:02

1 A Totally with you. It just popped into my 17:06:03
2 head, and I want to make sure I'm complete in 17:06:05
3 terms of my better-late-than-never philosophy. 17:06:08

4 You know, if you don't mind, what we can 17:06:15
5 do is, I will try to, expeditiously, during my 17:06:26
6 lunch break, go through and see what other matters 17:06:33
7 I had where I was on the defense side. I think 17:06:38
8 that's going to be most helpful, because, 17:06:41
9 unfortunately, especially with matters eight, 17:06:43
10 10 years back, I'm just not quickly summoning them 17:06:48
11 the way I wish I were able to. 17:06:51

12 Q I understand. Let me move to a few other 17:06:53
13 things before we break for lunch. Who is 17:06:56
14 Jodi Gottlieb, or Gottlieb, who Ms. Bredehoft 17:07:01
15 asked you about? 17:07:03

16 A In one of the documents? 17:07:10

17 Q Yeah, I just wanted to know Ms. Bredehoft 17:07:12
18 asked you about a woman named Jodi Gottlieb, 17:07:15
19 G-O-T-T-L-I-E-B, and I believe she's referenced in 17:07:20
20 some of the documents. I just want to know who 17:07:24
21 she is. 17:07:27

22 MS. BREDEHOFT: Objection to the form of 17:07:28

1 the question, mischaracterizes the questioning on 17:07:29
2 that. Calls for hearsay, foundation. 17:07:32
3 BY MR. CHEW: 17:07:35
4 Q Let me just -- I'll withdraw that and say: 17:07:35
5 Who is Jodi Gottlieb? 17:07:38
6 A I believe that Jodi Gottlieb is an 17:07:40
7 assistant to Ms. Heard, or may have a particular 17:07:44
8 function, but I don't -- you know what? I'm 17:07:49
9 really drawing a blank. You're going to have to 17:07:54
10 tell me. 17:07:57
11 Q Okay. Do you know whether she's a lawyer? 17:07:57
12 A I don't believe so. 17:08:00
13 Q Is she a publicist? 17:08:02
14 A Possibly, very possibly. 17:08:04
15 Q What role, if any, did she play in the 17:08:07
16 drafting of the op-ed at issue in Mr. Depp's 17:08:10
17 defamation case? 17:08:14
18 MS. BREDEHOFT: Objection. Calls for 17:08:15
19 foundation. Calls for speculation. Hearsay. 17:08:17
20 Go ahead. 17:08:19
21 A None that I recollect. 17:08:20
22 Q Does Ms. Heard have any written agreement, 17:08:27

1 of any kind, with the ACLU? 17:08:32

2 MR. SCHWARTZ: Objection. Lack of 17:08:36

3 personal knowledge. Foundation. 17:08:38

4 MS. BREDEHOFT: Yeah, objection. Hearsay. 17:08:39

5 Foundation. Calls for speculation. 17:08:43

6 Go ahead. 17:08:43

7 A I don't know. 17:08:44

8 Q You've never seen any agreement between 17:08:48

9 the ACLU, on the one hand, and Ms. Heard, on the 17:08:49

10 other hand? 17:08:53

11 MR. SCHWARTZ: Asked and answered. 17:08:54

12 MS. BREDEHOFT: And same objection, 17:08:55

13 hearsay, foundation, speculation, leading. 17:08:57

14 A I don't believe so. It's certainly 17:08:59

15 nothing that I recollect, as I sit here today. 17:09:01

16 Q Now, Mr. George, you testified in response 17:09:04

17 to Ms. Bredehoft's questions that you did some 17:09:06

18 bird-dogging or research on the issues of 17:09:11

19 confidentiality and defamation. 17:09:16

20 Did you provide any written advice to 17:09:19

21 Ms. Heard on the issue of defamation and whether 17:09:29

22 the op-ed was defamatory? 17:09:33

1 MR. SCHWARTZ: Objection. 17:09:36

2 MS. BREDEHOFT: Let me just object first 17:09:37

3 to the testifying and mischaracterization of the 17:09:38

4 earlier questions and testimony, and, then, calls 17:09:44

5 for hearsay. Foundation. But that's fine. 17:09:50

6 A So just so I understand, Mr. Chew, you 17:09:55

7 mean as distinct from whether there might be a 17:09:59

8 breach of the judgment of disillusion? 17:10:02

9 Q Yes. Those were the -- which issues, just 17:10:06

10 -- so nobody is mischaracterizing, which issues 17:10:10

11 were you engaged to research for Ms. Heard with 17:10:13

12 respect to the op-ed? 17:10:17

13 MS. BREDEHOFT: Objection. I'm going to 17:10:21

14 object to the form of the question, because, it, 17:10:25

15 again, mischaracterizes the testimony, and it's 17:10:26

16 leading and calls for speculation. 17:10:31

17 But go ahead. 17:10:34

18 A I believe that I intended to advise on 17:10:35

19 both, the point being to ensure that she not have 17:10:41

20 liability on any legal ground. 17:10:47

21 Q Am I correct to say that you focused on 17:10:49

22 two issues: One, confidentiality, and the other 17:10:52

1 guess that's the best answer I can give you. I 17:12:11
2 can't tell you that I said to her at any point, 17:12:15
3 here is a piece of advice that would pertain to a 17:12:19
4 potential defamation action, here is a piece of 17:12:24
5 advice that would pertain to a potential breach of 17:12:26
6 contract action. 17:12:30

7 But my intention was to make sure that she 17:12:31
8 was well-advised with respect to anything that 17:12:34
9 might be brought against her. 17:12:37

10 Q Did you provide any written advice to 17:12:39
11 Ms. Heard on the issue of defamation in the 17:12:41
12 context of the op-ed? 17:12:44

13 MR. SCHWARTZ: Asked and answered. 17:12:46

14 MS. BREDEHOFT: Objection. Asked and 17:12:47
15 answered. 17:12:48

16 A So the only written advice that I 17:12:48
17 provided, I believe, would be in the course of 17:12:56
18 what I was Sean by Ms. Bredehoft earlier today, 17:13:02
19 and whether any of those particular writings, 17:13:07
20 specifically or nonspecifically, is about 17:13:11
21 defamation, as opposed to breach of contract, I 17:13:14
22 can't say sort of as an overview of all of them. 17:13:18

1 Q Did you ever provide Ms. Heard legal 17:13:23
2 advice on Mr. Depp's complaint after it was filed 17:13:35
3 on March 1, 2019? 17:13:41

4 MS. BREDEHOFT: Objection. Leading, but 17:13:43
5 that now goes into that this part of the 17:13:47
6 attorney-client privilege has not been waived. 17:13:51
7 It's solely for the op-ed and the advice of the 17:13:54
8 op-ed, so that would call for attorney-client 17:13:57
9 communications, and I'm invoking the 17:14:01
10 attorney-client privilege with respect to work 17:14:03
11 product. 17:14:04

12 MR. CHEW: Are you instructing him not to 17:14:05
13 answer that question? 17:14:08

14 MR. SCHWARTZ: I will, after I also impose 17:14:09
15 the attorney-client work product protection. If 17:14:11
16 you're going to go into a string of these where 17:14:13
17 you're soliciting instructions not to answer, 17:14:17
18 maybe now is a good time to take a break. Our 17:14:17
19 lunch is not being delivered, unfortunately, but I 17:14:18
20 think we have to do something about that. 17:14:20

21 MR. CHEW: Well, I'd like to finish off 17:14:22
22 this string so we can have time and take a few. 17:14:24

1 It will just take a few minutes. 17:14:24

2 THE WITNESS: Go for it. 17:14:29

3 MR. CHEW: Thank you. 17:14:29

4 BY MR. CHEW: 17:14:29

5 Q Did you provide any written legal advice 17:14:29

6 relating to how Ms. Heard should respond to 17:14:39

7 Mr. Depp's complaint filed in Fairfax on 17:14:44

8 March 1, 2019? 17:14:48

9 MS. BREDEHOFT: I'm going to object. 17:14:50

10 Leading. Calls for hearsay. Foundation. But, 17:14:52

11 more significantly, I'm going to invoke the 17:14:57

12 attorney-client privilege on behalf of Ms. Heard. 17:15:00

13 We have not waived the privilege in connection 17:15:03

14 with any representation related to the complaint, 17:15:05

15 only with respect to the op-ed. That was a very 17:15:08

16 limited waiver, and we've already discussed that. 17:15:12

17 And also for work product. 17:15:14

18 Go ahead. 17:15:16

19 MR. SCHWARTZ: I'll reiterate the attorney 17:15:17

20 work product protection, and I will instruct the 17:15:19

21 witness not to answer solely because, Mr. Chew, 17:15:21

22 because you've specified the subject on which 17:15:23

1 Mr. George would have been asked to provide legal 17:15:25

2 advice. 17:15:28

3 BY MR. CHEW: 17:15:29

4 Q Did you provide any written legal advice 17:15:29

5 to Ms. Heard about how to respond to Mr. Depp's 17:15:32

6 complaint? 17:15:38

7 MS. BREDEHOFT: I believe that's the exact 17:15:39

8 same question you just asked. 17:15:40

9 MR. CHEW: I asked about oral advice. 17:15:42

10 MS. BREDEHOFT: I believe you asked 17:15:45

11 written next. I think you did both. So I'm going 17:15:46

12 to say asked and answered, also leading, hearsay, 17:15:50

13 foundation, but I'm going to object on the basis 17:15:52

14 of attorney-client privilege and I'm invoking it 17:15:54

15 on behalf of Ms. Heard. 17:16:02

16 MR. SCHWARTZ: And I will reiterate the 17:16:02

17 attorney work product protection objection, and 17:16:03

18 again specify that I will instruct my witness not 17:16:08

19 to answer because you specified the subject of 17:16:11

20 which attorney-client advice was elicited. 17:16:12

21 BY MR. CHEW: 17:16:15

22 Q Did you tell Ms. Heard in word or 17:16:15

1 substance that Mr. Depp's claim was not 17:16:19

2 meritorious? 17:16:24

3 MS. BREDEHOFT: I'm going to object on 17:16:26

4 leading, hearsay, foundation, but I'm also going 17:16:27

5 to object on the basis of attorney-client 17:16:31

6 communications on behalf of Ms. Heard. I'm 17:16:35

7 invoking the attorney-client communication 17:16:37

8 objection, as well as on work product. 17:16:40

9 Go ahead. 17:16:42

10 MR. CHEW: Are you instructing him not to 17:16:44

11 answer? 17:16:46

12 MR. SCHWARTZ: Yes, after I reiterate my 17:16:46

13 attorney work product objection, I will instruct 17:16:49

14 my witness not to answer because you specified the 17:16:50

15 subject and content of the attorney-client 17:16:53

16 communication that may have been solicited. 17:16:55

17 BY MR. CHEW: 17:16:59

18 Q Going back to the legal advice you gave 17:17:00

19 with respect to the op-ed, that is, before 17:17:02

20 Mr. Depp filed his complaint, what, if any, due 17:17:05

21 diligence did you do to determine whether 17:17:09

22 Ms. Heard's statements about being a victim of 17:17:12

1 domestic abuse were true? 17:17:18

2 MR. SCHWARTZ: Objection. Vague and 17:17:19

3 ambiguous as to due diligence and mischaracterizes 17:17:21

4 the evidence. Assumes facts not in evidence. 17:17:24

5 MS. BREDEHOFT: I'll join all of that. 17:17:29

6 A So in the course of representing 17:17:31

7 Ms. Heard, I did -- I want to be careful about how 17:17:39

8 I phrase, but I -- 17:17:45

9 MS. BREDEHOFT: Yeah, let me, Mr. George, 17:17:48

10 before you finish, I do want to invoke the 17:17:51

11 attorney-client communication to the extent it 17:17:53

12 seeks outside of the advice on the op-ed, 17:17:56

13 specifically. I will invoke the attorney-client 17:18:00

14 privilege for any other aspect of it. 17:18:03

15 MR. SCHWARTZ: And I will instruct the 17:18:06

16 witness not to reveal any communications that 17:18:07

17 would have been outside of that specific 17:18:10

18 particular context of advising about the language 17:18:11

19 in the op-ed. 17:18:13

20 A I'm sorry, I want to be very careful. 17:18:15

21 Q So what's the answer? 17:18:18

22 MR. SCHWARTZ: Well, I'm instructing the 17:18:22

1 witness not to answer to the extent that any 17:18:23
2 communications or answers that would come therein 17:18:26
3 had existed outside the context of discussions 17:18:29
4 specifically about the crafting of the op-ed. And 17:18:31
5 so -- 17:18:37
6 BY MR. CHEW: 17:18:37
7 Q You gave her the "all-clear"; is that your 17:18:38
8 testimony? 17:18:41
9 A Yes. 17:18:41
10 Q And you gave her the "all-clear" in terms 17:18:42
11 of it being not defamatory, right? 17:18:45
12 A Correct. 17:18:49
13 Q What did you do to determine that it was 17:18:50
14 not defamatory? 17:18:52
15 MS. BREDEHOFT: Again -- 17:18:54
16 MR. CHEW: Come on. You can't do this. 17:18:55
17 BY MR. CHEW: 17:19:00
18 Q What did you do? 17:19:00
19 MS. BREDEHOFT: Please don't interrupt me. 17:19:01
20 So to the extent your answer would reveal 17:19:04
21 any attorney-client communications that were 17:19:08
22 unrelated to your advice on the op-ed, I would 17:19:10

1 invoke the attorney-client communications. 17:19:15

2 Outside of that -- 17:19:19

3 MR. SCHWARTZ: And I will instruct the 17:19:20

4 witness not to answer outside the discussions that 17:19:22

5 Ms. Bredehoft went through earlier today about 17:19:24

6 determining whether or not the language in the 17:19:28

7 op-ed would be defamatory, but to the extent you 17:19:29

8 want to answer Mr. Chew's question about things 17:19:32

9 we've already covered in discussions in the 17:19:36

10 context of providing the advice on the language in 17:19:37

11 the op-ed, you can answer. 17:19:39

12 A Okay. So I think it it's fair to say I 17:19:41

13 brought to bear my knowledge of First Amendment 17:19:44

14 protections for free speech with respect to 17:19:46

15 defamation claims, other issues regarding 17:19:49

16 defamation law, and applied those provisions of 17:19:55

17 law to the specifics of the op-ed that was 17:20:03

18 presented to me in various different drafts. 17:20:08

19 Q What did you do, if anything, to determine 17:20:11

20 whether Ms. Heard had been abused, physically, by 17:20:14

21 Johnny Depp? 17:20:17

22 MS. BREDEHOFT: To the extent this calls 17:20:19

1 for attorney-client communications that are 17:20:22
2 outside of the advice on the op-ed, I would invoke 17:20:24
3 the attorney-client communication objection. 17:20:31
4 Outside of that, you may answer. 17:20:35
5 MR. SCHWARTZ: And I will instruct the 17:20:37
6 witness not to answer to the extent that the 17:20:39
7 answer would contain any communications that 17:20:41
8 existed prior to and separate from the discussion 17:20:43
9 and advice sought regarding the drafting of the 17:20:46
10 op-ed. 17:20:46
11 MR. CHEW: That was in the predicate of 17:20:52
12 the question. 17:20:54
13 BY MR. CHEW: 17:20:54
14 Q Would you please answer the question to 17:20:54
15 say what, if anything, you did to determine 17:20:57
16 whether Ms. Heard was truly, as she claimed, a 17:21:00
17 victim of domestic abuse before she published the 17:21:03
18 op-ed in the Washington Post. 17:21:07
19 A So that's a different question than what 17:21:09
20 you just asked, but I am going to follow the 17:21:12
21 client's invocation of the privilege unless and 17:21:15
22 until -- 17:21:19

1 Q You haven't been instructed not to answer. 17:21:19

2 MR. SCHWARTZ: It was just an invocation 17:21:23

3 of the privilege. 17:21:25

4 MR. CHEW: All right. I'm going to make a 17:21:29

5 record here, and, you know what, you don't have to 17:21:30

6 go through the whole speech. Just say you're 17:21:32

7 telling him not to answer. Because this is a real 17:21:36

8 joke. 17:21:39

9 BY MR. CHEW: 17:21:39

10 Q What, if anything, did you do, prior to 17:21:40

11 the publication of the op-ed, to determine whether 17:21:42

12 Amber Heard was telling the truth when she said 17:21:45

13 she was a victim of domestic abuse? 17:21:48

14 MS. BREDEHOFT: I'm going to -- I have a 17:21:51

15 number of objections, so let me put those on, 17:21:54

16 please, Mr. George, before you respond. 17:21:56

17 The first of those is that, Mr. Chew, 17:21:58

18 you've lost your temper and you're displaying 17:22:01

19 tremendous anger at the witness and counsel, and 17:22:02

20 it's inappropriate, and maybe this is a good time 17:22:05

21 to take a break. 17:22:08

22 MR. CHEW: No. He's going to answer the 17:22:10

1 question, unless you instruct him not to answer. 17:22:13

2 MS. BREDEHOFT: Please, do not talk to me 17:22:15

3 in that tone of voice, it's not appropriate. All 17:22:17

4 right? 17:22:21

5 MR. CHEW: You're trying to create a 17:22:21

6 record that's not here. He is not answering the 17:22:22

7 question. 17:22:23

8 MS. BREDEHOFT: I'm objecting to the 17:22:23

9 inappropriateness of your conduct and your tone of 17:22:27

10 voice in addressing the witness and counsel here. 17:22:28

11 Second of all, I'm going to object on the 17:22:31

12 fact that it is argumentative, the form of the 17:22:34

13 question, it's leading, hearsay, foundation. 17:22:38

14 But, more significantly, I'm continuing to 17:22:40

15 invoke the attorney-client communications to the 17:22:43

16 extent that it seeks attorney-client 17:22:47

17 communications that are prior to and outside of 17:22:50

18 the specific advice given on the op-ed. 17:22:53

19 MR. SCHWARTZ: And, moreover, I'm going to 17:22:57

20 object because it misstates the witness's 17:22:58

21 testimony, because the witness did not testify 17:23:01

22 that he gave any kind of all clear about the 17:23:03

1 allegations you described -- 17:23:05

2 MR. CHEW: We did. 17:23:07

3 MR. SCHWARTZ: -- Mr. Chew. Those are not 17:23:09

4 allegations contained in the op-ed or subject to 17:23:10

5 Mr. George's review. I will continue my 17:23:13

6 instruction that he should not reveal any 17:23:13

7 attorney-client communications beyond the scope of 17:23:16

8 the view of the op-ed, but he may answer within 17:23:18

9 that scope. 17:23:22

10 BY MR. CHEW: 17:23:23

11 Q Sir, within the scope of your engagement, 17:23:24

12 prior to the publication of the op-ed, what, if 17:23:28

13 any, investigation did you do of whether 17:23:32

14 Ms. Heard, in fact, was physically abused by 17:23:34

15 Mr. Depp, or did you just take her word for it? 17:23:38

16 MS. BREDEHOFT: Again, I'm going to object 17:23:42

17 to the tone and the manner in which you're 17:23:44

18 addressing the witness, and, second of all, I'm 17:23:48

19 going to say that it calls for hearsay and 17:23:51

20 foundation. But, third, and more significantly, 17:23:54

21 to the extent it seeks information of 17:23:57

22 attorney-client communications prior to the time 17:24:01

1 of the advice for the op-ed and outside of the 17:24:05
2 advice of the op-ed, I'm going to impose the 17:24:12
3 attorney-client privilege on the basis -- on 17:24:15
4 Ms. Heard's basis, on her behalf. 17:24:18

5 MR. SCHWARTZ: And I think the witness 17:24:23
6 understands the limitations that I've imposed, and 17:24:24
7 he can answer the question within those 17:24:27
8 limitations. 17:24:28

9 A No, with those limitations, I cannot. 17:24:28

10 MR. SCHWARTZ: Okay. There you go. 17:24:31
11 That's the answer to your question. 17:24:33

12 BY MR. CHEW: 17:24:33

13 Q Is truth a defense to a defamation claim? 17:24:33

14 MS. BREDEHOFT: Objection. Calls for a 17:24:37
15 legal conclusion, and -- yeah. And calls for a 17:24:39
16 legal conclusion and leading. 17:24:44

17 Go ahead. 17:24:45

18 MR. SCHWARTZ: And calls for opinion 17:24:46
19 testimony as well. 17:24:47

20 But go ahead. 17:24:48

21 A So as you pointed out earlier, I'm not 17:24:50
22 here as an expert, but if you would like a general 17:24:54

1 answer, I'm happy to give one. 17:24:58

2 Q Please proceed. Give an answer. 17:25:01

3 A Yes. 17:25:01

4 Q So truth is a defense to a defamation 17:25:05

5 claim, correct? 17:25:08

6 A Yes. 17:25:09

7 Q So what investigation did you do about the 17:25:09

8 truth of Ms. Heard's underlying claims? 17:25:12

9 MR. SCHWARTZ: Objection. That misstates 17:25:16

10 the witness's testimony. The question was whether 17:25:18

11 or not he provided advice on the op-ed. 17:25:20

12 Underlying claims are not even mentioned in the 17:25:23

13 op-ed. 17:25:26

14 MS. BREDEHOFT: Correct. And I again 17:25:26

15 adopt the same objections I had before with the 17:25:28

16 same imposition of the attorney-client -- 17:25:31

17 MR. CHEW: So we have an opinion from 17:25:35

18 Judge Weitz which would say otherwise. 17:25:37

19 MS. BREDEHOFT: To the extent -- I'm 17:25:39

20 sorry, please don't interrupt me. To the extent 17:25:41

21 it calls for communications that are outside of 17:25:43

22 the actual representation for the op-ed. Before, 17:25:47

1 as well. 17:25:52

2 BY MR. CHEW: 17:25:52

3 Q Is advice of counsel a defense to 17:25:55

4 defamation? 17:25:57

5 MR. SCHWARTZ: Objection. Calls for a 17:25:58

6 legal conclusion. 17:26:02

7 MS. BREDEHOFT: Yeah, join. 17:26:02

8 Go ahead. 17:26:03

9 A It calls for an expert conclusion, but 17:26:08

10 you're asking in Virginia law? 17:26:12

11 Q I'm asking under California law. 17:26:14

12 A So it may be, and I can't -- it would 17:26:16

13 depend on certain factors that I would need to 17:26:26

14 know more specifics about your factual question 17:26:32

15 and probably which state law applied. 17:26:35

16 Q Let's go back to Exhibit 13, our 17:26:39

17 Exhibit 13. 17:26:42

18 MR. SCHWARTZ: Hold on a second. It's now 17:26:43

19 2:26. There's been a problem with our lunch 17:26:45

20 order, and we don't have to waste everyone's time 17:26:48

21 with that, but you're onto a different line of 17:26:51

22 questions if you're going back -- 17:26:54

1 MR. CHEW: I'm closing something out. So 17:26:56
2 since you're not allowing him to answer any 17:26:58
3 questions, I'm going to close this one out. 17:27:00
4 BY MR. CHEW: 17:27:00
5 Q With respect to the arbitration demand 17:27:02
6 that was dismissed, did Ms. Heard proceed to file 17:27:05
7 her claim in a court? 17:27:11
8 A No. 17:27:17
9 Q Why not? 17:27:18
10 MS. BREDEHOFT: Objection. Calls for 17:27:19
11 attorney-client communications, and I would invoke 17:27:21
12 the attorney-client privilege. 17:27:24
13 MR. SCHWARTZ: And attorney work product 17:27:26
14 protection as well, and I'll instruct the witness 17:27:28
15 not to answer the question at all. 17:27:30
16 A I can't answer. 17:27:35
17 Q Okay. All right. What about in Virginia 17:27:37
18 law, is advice of counsel a defense to a 17:27:39
19 defamation action under Virginia law? 17:27:42
20 MS. BREDEHOFT: Objection. Calls for a 17:27:44
21 legal conclusion. 17:27:46
22 MR. SCHWARTZ: From an expert witness. 17:27:49

1 A I don't know. 17:27:49

2 Q And you testified earlier you were -- 17:27:53

3 Ms. Heard dismissed you as counsel, correct? 17:27:59

4 A Well, I'm not sure I -- 17:28:03

5 MS. BREDEHOFT: Objection -- 17:28:06

6 THE WITNESS: I'm sorry. Go ahead, 17:28:08

7 Counsel. 17:28:10

8 MS. BREDEHOFT: I'm going to object 17:28:10

9 because it mischaracterizes the testimony. 17:28:11

10 But go ahead. 17:28:15

11 A Yeah. I was substituted out as counsel. 17:28:16

12 Q I think, in George 39, that Ms. Bredehoft 17:28:20

13 read you, Ms. Heard wrote that she no longer 17:28:27

14 wishes to have you as her lead counsel; do you 17:28:32

15 recall that? 17:28:35

16 MS. BREDEHOFT: Objection. 17:28:35

17 Mischaracterizes and misstates the document and 17:28:36

18 the testimony. 17:28:38

19 A I do. 17:28:39

20 Q Mr. George, would you correct the record 17:28:41

21 then, and read the right language in George 39, 17:28:43

22 whether Ms. Heard wishes to have you as her 17:28:50

1 counsel. 17:28:52

2 A Sure. 17:28:53

3 Q What does it say? 17:28:53

4 MS. BREDEHOFT: Objection. Wait, before 17:28:55

5 you do that, he's saying it's Ms. Heard again, 17:28:56

6 and, of course, it's not Ms. Heard who wrote that. 17:28:59

7 So that's what I'm objecting -- 17:29:01

8 MR. CHEW: Well, now you're testifying. 17:29:04

9 MS. BREDEHOFT: No, I asked him if he knew 17:29:06

10 who wrote that, and he said he didn't. And you're 17:29:08

11 just putting words in his mouth. So I'm objecting 17:29:11

12 to the mischaracterization of that, and hearsay, 17:29:14

13 foundation. 17:29:16

14 Go ahead. 17:29:17

15 BY MR. CHEW: 17:29:17

16 Q What does the language say? 17:29:17

17 A It states, "Defendant no longer wishes to 17:29:19

18 have Eric George and Richard Schwartz represent 17:29:24

19 her in the lawsuit." 17:29:26

20 Q And who signed that document, George 39? 17:29:27

21 A It is an illegible signature that says, 17:29:31

22 "By counsel," and then a series of lawyers 17:29:36

1 afterwards. 17:29:38

2 Q Who were the lawyers? 17:29:38

3 A Roberta A. Kaplan, Julie E. Fink, 17:29:39

4 John C. Quinn, J. Benjamin Rottenborn, 17:29:46

5 Joshua R. Treece. 17:29:51

6 Q Why did -- is that statement false? 17:29:54

7 MS. BREDEHOFT: Objection. 17:29:59

8 MR. SCHWARTZ: Lack of personal knowledge. 17:30:02

9 MS. BREDEHOFT: Yeah. Hold on a second. 17:30:04

10 Yeah, it calls for -- well, it's also leading but 17:30:12

11 I think it calls for -- I'm just going to say 17:30:18

12 lacks foundation and calls for hearsay. 17:30:26

13 Go ahead on that one. 17:30:28

14 A I don't think I am permitted to get into 17:30:30

15 the reasons for the discussions that I had with my 17:30:33

16 client as to why I was substituted out. 17:30:36

17 MS. BREDEHOFT: That's true. Let me 17:30:36

18 invoke the attorney-client communication on that 17:30:43

19 one. I thought he was asking a different 17:30:44

20 question. 17:30:46

21 MR. CHEW: Okay. Well, let's close this 17:30:48

22 out and let's try to do this quickly, because 17:30:49

1 there's a way you can do this quickly. You can 17:30:51
2 just say, I'm instructing him not to answer. I'm 17:30:52
3 going to ask the question, he's not going to 17:30:54
4 answer, and he's going to let you give him an 17:30:57
5 instruction. But let's do this quickly. 17:31:01
6 BY MR. CHEW: 17:31:03
7 Q Mr. George, why did Ms. Heard dismiss you 17:31:05
8 as her counsel? 17:31:09
9 MS. BREDEHOFT: I'm going to object to the 17:31:11
10 extent that it calls for attorney-client 17:31:13
11 communication, and I'm going to invoke the 17:31:14
12 attorney-client privilege. 17:31:16
13 MR. SCHWARTZ: And I am instructing the 17:31:16
14 witness not to answer, and add the objection, 17:31:17
15 lacks personal knowledge. 17:31:18
16 A And I'm following the instruction. 17:31:19
17 MR. CHEW: All right. I think now is a 17:31:24
18 good time for a lunch break. 17:31:27
19 THE WITNESS: Counsel, yeah. I'm pretty 17:31:28
20 sure I don't think we're getting lunch here. 17:31:31
21 MR. SCHWARTZ: Our lunch did not get 17:31:34
22 delivered, so I think we're going to have to 17:31:36

1	figure something else out.	17:31:39
2	MR. CHEW: Why don't we take a half an	17:31:39
3	hour and start at 3:00 your time.	17:31:42
4	THE WITNESS: So let me just suggest this.	17:31:46
5	If you prefer that, that's great. If you'd rather	17:31:50
6	start earlier, that's fine, too. So we'll be	17:31:53
7	guided by what everybody on the call wants to do.	17:31:59
8	MS. BREDEHOFT: Yeah. We have the court	17:32:05
9	reporter, too. Did you-all have a preference	17:32:07
10	here?	17:32:09
11	(Whereupon, an off-the-record discussion	17:32:24
12	with the technician, videographer, and court	17:32:24
13	reporter occurred.)	17:32:47
14	THE VIDEOGRAPHER: Off the record at	17:32:47
15	5:32 p.m.	17:32:49
16	(Whereupon, the court reporter noted the	17:32:49
17	witness's time as 2:32 p.m. Pacific.)	17:32:50
18	(A recess was taken.)	17:33:24
19	THE VIDEOGRAPHER: We are back on the	17:57:01
20	record at 5:57.	17:57:08
21	(Whereupon, the court reporter noted the	17:57:08
22	witness's time as 2:57 Pacific.)	17:57:16

1 BY MR. CHEW: 17:57:16

2 Q Thank you, Mr. George. I'll get to your 17:57:16

3 homework in a minute, but I wanted to follow 17:57:19

4 through on a couple of other issues. Going back 17:57:22

5 to the legal work you did relating to the op-ed, 17:57:24

6 did you do the analysis based on California law, 17:57:30

7 or some other state law? 17:57:35

8 MS. BREDEHOFT: Objection to the form of 17:57:39

9 the question. Vague and ambiguous, but go ahead. 17:57:41

10 A I guess I'd put it this way, I did it 17:57:43

11 based upon what the constitutional protections for 17:57:47

12 free speech applied to across the board with 17:57:55

13 respect to all states, which, of course, gives you 17:57:57

14 a safe harbor, no matter which state law would be 17:58:01

15 brought to bear on the issue. 17:58:04

16 Q Did you also look at California law? 17:58:07

17 A Sure. That certainly would have gone 17:58:08

18 within my analysis about what could subject 17:58:11

19 somebody to suit. 17:58:15

20 Q Did you look at Virginia law? 17:58:16

21 A Not in particular, no. Just to follow, 17:58:18

22 again, subject to the point that there are federal 17:58:25

1 constitutional protections regardless of the state 17:58:28
2 in which a suit would be brought, so in that 17:58:31
3 respect, yes, but not directly. 17:58:34

4 Q I'll move to strike anything after the 17:58:37
5 word "No." 17:58:40

6 You didn't look at any Virginia cases, did 17:58:41
7 you? 17:58:43

8 A I'm sorry? 17:58:44

9 Q You didn't look at any Virginia cases, did 17:58:44
10 you? 17:58:47

11 A I did not. 17:58:48

12 Q Did you look at the Virginia venue statute 17:58:48
13 that you later moved to dismiss on? 17:58:53

14 A You're saying in the course of my 17:58:55
15 providing counsel prior to the publication of the 17:58:57
16 piece? 17:59:00

17 Q Correct. 17:59:00

18 A I did not. 17:59:01

19 Q And other than California and 17:59:02
20 constitutional law, did you look at any other 17:59:08
21 state's law? 17:59:11

22 MR. SCHWARTZ: Again, Mr. Chew, you're 17:59:12

1 talking about in the period just prior to the 17:59:16
2 publication of the article and solely with respect 17:59:16
3 to the publication of the op-ed? 17:59:18

4 MR. CHEW: Yes. 17:59:22

5 MS. BREDEHOFT: Yeah, thanks. 17:59:23

6 A So I did say this, and this actually does 17:59:23
7 dovetail into this homework that I did over the 17:59:26
8 last few minutes. Some of the cases that I've 17:59:28
9 been involved with involve other state law, but 17:59:31
10 with respect to what the substantive defenses are 17:59:32
11 to a defamation claim, because they are federally 17:59:36
12 constitutional in nature, I don't think that that 17:59:40
13 makes a difference as to which state you're 17:59:41
14 looking at. 17:59:44

15 So to the extent that those other cases 17:59:45
16 informed my view of what could be defamatory or 17:59:47
17 not, yes, that would be done into the analysis, 17:59:52
18 but it's equally true I did not look specifically 17:59:55
19 to or research specifically any particular state's 18:00:01
20 law with respect to defamation during that time 18:00:04
21 period. 18:00:06

22 Q And, in particular, you didn't look at 18:00:06

1	Virginia law?	18:00:09
2	A Again, subject to those caveats, that's	18:00:10
3	exactly right.	18:00:12
4	Q Well, what caveats would have you look at	18:00:13
5	Virginia law?	18:00:17
6	A Well, only in respect to no state,	18:00:18
7	Virginia or otherwise, can deem a statement to be	18:00:21
8	defamatory if that statement is one that enjoys	18:00:27
9	federal constitutional free speech protections.	18:00:31
10	Q All right. Tell me about your homework.	18:00:35
11	A Okay. I jotted down some notes here on	18:00:41
12	the back of an envelope. So Rick was 100 percent	18:00:46
13	right, and more cautious than I was prepared to	18:00:53
14	be, on the London Fields matter, the settlement	18:00:56
15	does require notice to the plaintiff party. And	18:01:00
16	I'm going to look to Rick here, the plaintiff	18:01:07
17	party, Nicola, N-I-C-O-L-A, Six, so counsel can	18:01:12
18	give us that notice, or whatever it is, and we'll	18:01:19
19	comply.	18:01:21
20	Q And before you leave that, with what firm	18:01:22
21	is Nicola Six at?	18:01:28
22	MS. BREDEHOFT: That's the name of the	18:01:29

1 entity that was the plaintiff. 18:01:32

2 BY MR. CHEW: 18:01:34

3 Q Do you know who Nicola Six's counsel was 18:01:34

4 in that matter? 18:01:37

5 A It was -- and I don't know if it's still 18:01:37

6 the case, but, presumably, Greenberg Traurig. 18:01:39

7 Q And do you know who, at Greenberg Traurig 18:01:45

8 was representing that client? 18:01:46

9 A Yes, that's the Matt Rosengart. 18:01:46

10 Q Okay. What's next on your homework list? 18:01:49

11 A You had asked about this Arrington versus 18:01:51

12 Jen Allen suit where I served as plaintiff counsel 18:01:57

13 in a defamation claim. The settlement did not 18:01:59

14 have a confidentiality provision, so I can talk 18:02:02

15 about that, but I've got to correct myself. My 18:02:05

16 recollection was it had been brought in Northern 18:02:07

17 California, which is where the plaintiff lived. 18:02:11

18 In fact, it was brought in the Western 18:02:14

19 District of Washington, I think federal court, but 18:02:17

20 I'm not 100 percent sure on that, and the 18:02:21

21 settlement required the plaintiff to make a 18:02:27

22 retraction of her line, which we stated was 18:02:30

1	defamatory.	18:02:37
2	Q Any other terms besides the retraction?	18:02:38
3	A I don't believe that there were any other	18:02:41
4	requirements. There was probably a full release,	18:02:44
5	et cetera.	18:02:47
6	Q All right. Anything else other than your	18:02:47
7	homework gleaned?	18:02:51
8	A Yes. So a few more cases. On the defense	18:02:52
9	side, I was counsel last year to a man whose last	18:02:59
10	name is Keeme, K-E-E-M-E, who had been sued by a	18:03:05
11	plaintiff whose last name was LaCoste,	18:03:12
12	L-A-C-O-S-T-E. The suit was brought in the	18:03:16
13	Central District of California, federal court, and	18:03:18
14	we regarded it as a defamation case. I think that	18:03:21
15	they styled the claim as tortious interference,	18:03:25
16	but we defended that through an anti-SLAPP motion	18:03:29
17	and were successful.	18:03:34
18	And then, also on the defense side, and	18:03:35
19	again, I would just ask for courtesy, because it's	18:03:38
20	a pending case, just some sensitivity with respect	18:03:42
21	to any questions about it. I'm currently	18:03:45
22	representing a defendant called Partners	18:03:47

1 Personnel. I think it's the Santa Barbara 18:03:54
2 Superior Court, being sued for defamation by a 18:03:58
3 company called Baron HR West. So those are on the 18:04:00
4 defense side. And that is pending. 18:04:05

5 On the plaintiff side, the matter that I 18:04:07
6 had said I shouldn't talk about because I didn't 18:04:11
7 think that it actually had gone public, it had. 18:04:15
8 We settled the matter, but only after we filed a 18:04:22
9 plaintiff's side defamation claim, and I believe 18:04:27
10 that was filed LA Superior. The name of the 18:04:32
11 plaintiff is Jed Lieber, L-I-E-B-E-R, the name of 18:04:37
12 the defendant is Samantha Ryan. That was filed at 18:04:43
13 some point in fall or winter of 2020, and, again, 18:04:45
14 the mater settled shortly thereafter. 18:04:50

15 Also, I talked with you about the Graff 18:04:54
16 case. It was not eight years ago, it was more 18:05:00
17 like six years ago. It's LA Superior. The 18:05:05
18 plaintiff's name is Olivia Vaatate, V-A-A-T-A-T-E. 18:05:10

19 And then, last, we were also involved in a 18:05:20
20 couple of defamation proceedings, one was in -- 18:05:24
21 and when I say "we," I don't mean just me. My 18:05:32
22 firm has plenty other matters in defamation that 18:05:38

1 I'm not addressing here. 18:05:42

2 We represented a company called "CRT." It 18:05:43

3 was against a party, Mark Steyn, S-T-E-Y-N. It 18:05:48

4 was an arbitration proceeding that took in a 18:05:54

5 confidential arbitration proceeding in Vermont, 18:05:57

6 and then there was a Nevada-based proceeding as 18:06:00

7 well. The arbitration involved the company, we 18:06:03

8 represented the principal of the company who, as 18:06:09

9 an individual -- brought suit as an individual in 18:06:11

10 Nevada. I think that mostly hopefully, takes care 18:06:14

11 of my promised to-do list. 18:06:18

12 Q Great. Now, I appreciate that, 18:06:20

13 Mr. George. 18:06:23

14 Prior to representing Ms. Heard in the 18:06:23

15 matter filed by Mr. Depp, in Fairfax County, on 18:06:26

16 March 1, 2019, had you ever served as first chair 18:06:31

17 defending any defamation claim brought in state or 18:06:36

18 federal court in Virginia? 18:06:42

19 A I've not had the pleasure. 18:06:43

20 Q Prior to representing Ms. Heard and 18:06:45

21 Mr. Depp's case filed in Fairfax County on 18:06:49

22 March 1, 2019, had you ever represented a 18:06:54

1 plaintiff in a defamation matter, either in state 18:06:57

2 or federal court in Virginia? 18:07:01

3 A No. 18:07:04

4 Q Okay. If you could please now open up or 18:07:04

5 look at our Exhibit 14, and we can close out this 18:07:08

6 matter, and this is an exhibit I think we sent to 18:07:19

7 Alex during the break. 18:07:23

8 I'm not going to go back into this much. 18:07:25

9 I just want you to take a look at it and ask 18:07:29

10 whether -- okay. That's -- you have that as 14. 18:07:32

11 Let's look at 15. Look at 15. 18:07:37

12 We'll look at that one later. Let's look 18:07:55

13 and see what you have as 15. 18:07:57

14 That's it. 18:08:04

15 (Whereupon, the above-referenced document 18:07:51

16 was marked as Exhibit No. 47.) 18:07:51

17 BY MR. CHEW: 18:07:51

18 Q So Mr. George, if you would please take a 18:08:06

19 look at this, as long as you need to, and let us 18:08:10

20 know whether you've ever seen it before. 18:08:13

21 A I believe that I have. 18:08:18

22 Q And what do you understand it to be? 18:08:21

1 MS. BREDEHOFT: Objection, calls for 18:08:24
2 hearsay and not best evidence. Document speaks 18:08:26
3 for itself. 18:08:31
4 MR. SCHWARTZ: And can I ask the tech to 18:08:34
5 scroll a little bit more so my client can actually 18:08:36
6 review the document. It's a little fast. 18:08:41
7 A No, that's all right. 18:08:48
8 MR. CHEW: Actually, why don't you scroll 18:08:50
9 back to page 10, at the end because that's what I 18:08:51
10 want to ask about and I just want to be sure he 18:08:54
11 sees it. 18:08:57
12 THE WITNESS: Okay. Do you mind going a 18:09:04
13 little further. 18:09:08
14 MR. CHEW: Yeah, please go to the bottom 18:09:09
15 of that document. 18:09:11
16 That's perfect. 18:09:12
17 BY MR. CHEW: 18:09:15
18 Q Mr. George, what do you understand this to 18:09:15
19 be? 18:09:15
20 A Give me a half a second here. 18:09:18
21 MS. BREDEHOFT: That's all right. I've 18:09:20
22 got some objections to make anyway. Hearsay. Not 18:09:23

1 best evidence. Document speaks for itself. 18:09:24

2 Go ahead. 18:09:26

3 A Okay. So to your question, this, I 18:09:40

4 believe, was initially issued as a tentative 18:09:43

5 ruling, and then, following an oral argument, it 18:09:49

6 became a final ruling with respect to this 18:09:56

7 arbitrator jurisdiction issue that we've talked 18:10:01

8 about. 18:10:05

9 Q And let me just read you the first 18:10:06

10 sentence of the ruling, "Unless and until there's 18:10:09

11 a determination by me or a court of competent 18:10:10

12 jurisdiction that the claim asserted in the demand 18:10:13

13 is arbitrable, (i.e. that a binding arbitration 18:10:16

14 exists and covers the subject claim), respondent 18:10:21

15 need not answer." 18:10:25

16 Did I read that correctly? 18:10:25

17 A Technically, you missed one word, but, 18:10:27

18 yes, you did. 18:10:30

19 Q Was the respondent Mr. Depp? 18:10:31

20 A Correct. 18:10:33

21 Q And the party requiring arbitration was 18:10:33

22 your client, Ms. Heard, correct? 18:10:36

1	A Yes.	18:10:39
2	MR. CHEW: Let's now move to Exhibit 1,	18:10:39
3	please.	18:10:42
4	(Whereupon, the above-referenced document	18:10:42
5	was marked as Exhibit No. 48.)	18:10:42
6	BY MR. CHEW:	18:10:42
7	Q And ask you whether you've ever seen this	18:11:03
8	document before.	18:11:06
9	A I have.	18:11:07
10	Q What is it?	18:11:09
11	A This appears to be the lawsuit that	18:11:11
12	Mr. Depp brought against Ms. Heard in Fairfax	18:11:14
13	County.	18:11:19
14	Q Okay. And if we could move ahead, please,	18:11:19
15	to Exhibit A. Which is -- after page 30 in the	18:11:25
16	complaint, you'll see there's an Exhibit A, which	18:11:32
17	I'll ask you to identify, and I'll represent to	18:11:36
18	you is a true and correct copy of the op-ed at	18:11:39
19	issue, but that will be for you to say.	18:11:43
20	Okay. You might want to take control of	18:11:48
21	this, if you wish, or just our technician, ask	18:11:56
22	Alex to move ahead if you need to.	18:12:04

1 MR. SCHWARTZ: Counsel, I'm not sure we 18:12:11
2 have the ability to take control. 18:12:13

3 MR. CHEW: Okay. Alex, if you could 18:12:15
4 please just move forward a little bit to the 18:12:17
5 second page. All right, stop there. 18:12:22

6 BY MR. CHEW: 18:12:27

7 Q Mr. George, is this the op-ed that we've 18:12:28
8 been talking about? 18:12:30

9 A So I believe it is, and the only reason I 18:12:31
10 say "I believe," is, obviously, I'm not going 18:12:40
11 word-for-word through it, but if it is your 18:12:42
12 belief, I'm more than happy to accept it. 18:12:48

13 But that's indeed the same as -- and I'm 18:12:53
14 forgetting what was the -- maybe it was Exhibit 35 18:12:58
15 that had the final version -- but if it is, then 18:13:01
16 my answer is, it is. 18:13:04

17 Q Yeah. I'll represent to you that it is. 18:13:05

18 Let me direct your attention to the 18:13:07
19 paragraph, the one-word paragraph, "Then, two 18:13:09
20 years ago, I became a public figure representing 18:13:17
21 domestic abuse, and I felt the full force of our 18:13:20
22 culture's wrath for women who speak out." 18:13:24

1 Did I read that correctly? 18:13:29

2 A Yes. 18:13:30

3 Q What was your client referring to when she 18:13:31

4 said, "Then two years ago, I became a public 18:13:34

5 figure representing domestic abuse"? 18:13:37

6 MS. BREDEHOFT: Objection. Calls for 18:13:40

7 speculation. Hearsay. Foundation. 18:13:42

8 Go ahead. 18:13:45

9 A So I know that Ms. Heard has become 18:13:46

10 involved, and publicly so, in various issues, 18:13:54

11 including domestic abuse, so that's how -- that's 18:14:01

12 why that strikes me as an accurate statement. 18:14:09

13 Q And what happened two years ago, that is, 18:14:14

14 2016, that made her a "public figure representing 18:14:18

15 domestic abuse"? 18:14:21

16 MS. BREDEHOFT: Objection. Calls for 18:14:22

17 hearsay. Foundation. Not best evidence. 18:14:25

18 Speculation. 18:14:28

19 Go ahead. 18:14:29

20 A So I look at that from the standpoint of 18:14:30

21 the work that she has done as a public figure 18:14:35

22 representing domestic abuse. I'd say, rather than 18:14:39

1 representing domestic abuse, somebody who was 18:14:46
2 speaking to it and involved in it. Being a public 18:14:51
3 face for issues of domestic abuse. 18:14:57
4 Q Doesn't that refer to Johnny Depp? 18:15:01
5 MS. BREDEHOFT: Objection. Leading. 18:15:04
6 Hearsay. Foundation. Speculation. 18:15:05
7 A No. 18:15:08
8 Q So what else happened in 2016 that made 18:15:11
9 her a "public figure"? 18:15:13
10 MS. BREDEHOFT: Objection. Hearsay. 18:15:16
11 Foundation. Calls for speculation. 18:15:19
12 Go ahead. 18:15:21
13 A Just my prior answer about a person who 18:15:22
14 has identified herself, publicly, with issues, in 18:15:27
15 this case, of domestic abuse. 18:15:31
16 Q So all of that discussion about 18:15:32
17 Johnny Depp and all the exhibits Ms. Bredehoft 18:15:35
18 showed you for two-plus hours has nothing to do 18:15:38
19 with Johnny Depp? 18:15:44
20 MS. BREDEHOFT: Objection. Leading. 18:15:45
21 Hearsay. Foundation. Speculation. 18:15:47
22 Go ahead. 18:15:48

1 MR. SCHWARTZ: And misstates the witness's 18:15:49

2 testimony as well. 18:15:51

3 A I might not be following you when you say 18:15:52

4 it has nothing to do with Mr. Depp? 18:15:55

5 Q Then she says, "And I felt the full force 18:16:01

6 of our culture's wrath for women who speak out." 18:16:04

7 What caused the "full force of culture's 18:16:09

8 wrath" to fall upon Amber Heard? 18:16:14

9 MS. BREDEHOFT: Objection. Hearsay. 18:16:16

10 Foundation. Calls for speculation. 18:16:19

11 Go ahead. 18:16:19

12 A Do me a favor, just -- again, you can't 18:16:20

13 see us, but it's 10 or so feet in front of me. 18:16:23

14 Can you just point out the line? 18:16:29

15 Q She's saying, right here, "And I felt the 18:16:31

16 full force of our culture's wrath for women who 18:16:35

17 speak out." 18:16:40

18 What was she referring to there? 18:16:42

19 MS. BREDEHOFT: Objection. Hearsay. 18:16:43

20 Foundation. Calls for speculation. 18:16:47

21 Go ahead. 18:16:48

22 A Thank you. I think she was saying that in 18:16:48

1 regards to the response to her becoming a public 18:16:51

2 figure representing domestic abuse. 18:16:55

3 Q So it's just because she took the generic 18:16:58

4 position that abuse is bad, that's why people 18:17:01

5 attacked her? You're really saying that under 18:17:05

6 oath? 18:17:08

7 MS. BREDEHOFT: Objection. 18:17:08

8 MR. SCHWARTZ: Objection. 18:17:09

9 MS. BREDEHOFT: Argumentative. Hearsay. 18:17:10

10 Foundation. Leading. And calls for speculation. 18:17:12

11 Go ahead. 18:17:16

12 MR. SCHWARTZ: And misstates the witness's 18:17:16

13 testimony. 18:17:19

14 A What I'm saying, under oath, is that this 18:17:19

15 has nothing to do with Johnny Depp. 18:17:22

16 Q Boy. Let's go down. 18:17:26

17 MR. CHEW: You-all are consistent. 18:17:34

18 Q "Friends and advisors told me I would 18:17:40

19 never again work as an actress, that I would be 18:17:42

20 blacklisted." 18:17:48

21 What friends and advisors told Ms. Heard 18:17:49

22 she would never work again as an actress? 18:17:51

1 MS. BREDEHOFT: Objection. Foundation. 18:17:53
2 Speculation. 18:17:55

3 MR. SCHWARTZ: And before you answer, I'm 18:17:56
4 going to object and move to strike the commentary 18:17:58
5 between questions. 18:18:02

6 MS. BREDEHOFT: Yes, agreed. 18:18:02

7 MR. CHEW: I'll withdraw that. 18:18:04

8 THE WITNESS: I don't know -- or at least 18:18:06
9 let me put it precisely. I don't recall what the 18:18:11
10 answer to that might be. I don't know if I ever 18:18:15
11 particularly knew that. 18:18:18

12 BY MR. CHEW: 18:18:20

13 Q It wasn't part of the scope of your 18:18:21
14 reviewing the op-ed for potential legal exposure 18:18:24
15 to find out what she was talking about? 18:18:28

16 MS. BREDEHOFT: Objection. Hearsay. 18:18:31
17 Foundation. Leading. 18:18:32
18 Go ahead. 18:18:34

19 A Yeah. Not necessarily, Counsel, because, 18:18:35
20 to the extent that Ms. Heard is telling me 18:18:38
21 something, which I make the assumption is a 18:18:45
22 truthful statement, with friends and/or advisors 18:18:49

1 had apprised her that she would never work again 18:18:55
2 as an actress, something like that, I certainly 18:18:59
3 don't have any reason to disbelieve. 18:19:03

4 Q Did you assume it, or did you actually 18:19:05
5 discuss with your client whether friends and 18:19:07
6 advisors told her she would never work again as an 18:19:10
7 actress? 18:19:13

8 MS. BREDEHOFT: Again, objection. 18:19:14
9 Hearsay. Leading. Calls for speculation. 18:19:16

10 Go ahead. 18:19:21

11 A I don't recollect one way or another on 18:19:22
12 that one. 18:19:24

13 Q Did you have any notes or memos that 18:19:25
14 reflect any such conversations? 18:19:29

15 MS. BREDEHOFT: Objection. Hearsay. 18:19:30
16 Foundation. 18:19:31

17 MR. SCHWARTZ: And to the extent that any 18:19:32
18 of these questions are asking for facts learned 18:19:34
19 outside the context of advising on this particular 18:19:37
20 op-ed, then I would instruct the witness not to 18:19:39
21 answer and reveal attorney-client communications. 18:19:43

22 MS. BREDEHOFT: Join, and I would impose 18:19:46

1 that, to the extent it's outside the extent of the 18:19:48
2 attorney-client privilege objection. 18:19:53

3 A So to the extent what I understand the 18:19:55
4 privilege to be waived for, no, I don't believe I 18:19:58
5 have such notes. 18:20:01

6 Q So what discussions, if any, did you have 18:20:02
7 with Ms. Heard about friends and advisors 18:20:05
8 allegedly telling her that she would never work 18:20:10
9 again as an actress and that she would be 18:20:12
10 blacklisted? 18:20:15

11 MS. BREDEHOFT: Asked and answered. 18:20:16
12 Hearsay. Leading. Foundation. And, again, to 18:20:18
13 the extent that it would relate to any 18:20:22
14 communications that are outside the scope of the 18:20:26
15 particular representation for the op-ed, I would 18:20:32
16 impose the attorney-client privilege. 18:20:34

17 MR. SCHWARTZ: And I will instruct the 18:20:36
18 witness not to answer to the extent the answer 18:20:37
19 requires testifying about matters outside the 18:20:40
20 scope of the advice of the drafting of the op-ed. 18:20:43

21 A But I can answer, within that scope, I 18:20:43
22 just don't have a recollection of any such 18:20:46

1 discussion. 18:20:49

2 Q While you were advising Ms. Heard with 18:20:50

3 respect to the op-ed, what conversations, if any, 18:20:53

4 did you have with her about whether she was abused 18:20:59

5 by Johnny Depp? 18:21:04

6 MS. BREDEHOFT: You're asking -- I just 18:21:12

7 want to be clear, Ben, you're asking within the 18:21:14

8 scope of his advice on the op-ed; is that correct? 18:21:17

9 MR. CHEW: My question was policitly [sic] 18:21:21

10 clear, and you've given him some extra time to 18:21:25

11 think about it. Now he can answer. 18:21:27

12 MS. BREDEHOFT: Can you tell me what 18:21:28

13 "policitly" means? 18:21:32

14 MR. CHEW: Crystal clear. It's from 18:21:32

15 Judge Ellis. 18:21:36

16 THE WITNESS: So within this specific time 18:21:36

17 period where I'm advising Ms. Heard about the 18:21:40

18 op-ed, I don't believe that we had a particular 18:21:43

19 discussion at that particular time, but it is very 18:21:51

20 important for me to emphasize that I am not, until 18:21:54

21 the privilege is waived or I'm so ordered, getting 18:21:58

22 into any such prior discussions to the extent that 18:22:02

1 they occurred beforehand. 18:22:04

2 Q How would you possibly give an opinion to 18:22:07

3 a client without asking her about whether she was 18:22:10

4 physically abused? 18:22:15

5 MS. BREDEHOFT: Objection. You're 18:22:17

6 misstating the testimony and it's misleading, 18:22:18

7 argumentative, and hearsay. Foundation. And 18:22:23

8 calls for speculation. 18:22:26

9 MR. SCHWARTZ: And misstates the witness's 18:22:28

10 testimony. 18:22:30

11 A And I do have to say it misstates the 18:22:30

12 article. I do believe if you go up further, at 18:22:34

13 the top, it talks about the time of college 18:22:38

14 becoming an abuse victim. 18:22:41

15 But I wanted to just emphasize, as I've 18:22:44

16 tried to, maybe not as effectively as I should 18:22:47

17 have in my last answer -- that, within the narrow 18:22:51

18 scope of time between when I was consulted about 18:22:56

19 the possible op-ed and the publication of the 18:23:00

20 op-ed, I don't believe we had any such discussion, 18:23:03

21 particularly about this issue of whether or not 18:23:06

22 Mr. Depp had abused her. 18:23:10

1 But, again, I am not getting into, until 18:23:12
2 privilege is waived or the Court orders me to, 18:23:16
3 prior discussions that I may have had with 18:23:19
4 Ms. Heard on that topic. 18:23:22

5 Q Was Ms. Heard still of college age as of 18:23:24
6 2016, two years before the op-ed was published? 18:23:27

7 A I think we can stipulate on that. 18:23:33

8 Q Stipulate what? 18:23:37

9 A That she was not. 18:23:37

10 Q Right. So why are you trying to conflate 18:23:38
11 her allegations of being harassed when she was 18:23:42
12 much younger and of college age with what happened 18:23:45
13 two years ago? 18:23:49

14 MS. BREDEHOFT: Objection. Argumentative. 18:23:50
15 Wait. Leading. Hearsay. Foundation. 18:23:52

16 BY MR. CHEW: 18:23:55

17 Q What conversations, if any, did you have 18:23:56
18 with Ms. Heard prior to the publication of the 18:23:58
19 op-ed of what happened two years ago, when she 18:24:02
20 became a "public figure representing domestic 18:24:06
21 abuse"? 18:24:08

22 MS. BREDEHOFT: To the extent than that 18:24:08

1 would call for attorney-client communications that 18:24:10
2 occurred prior to your representation of Ms. Heard 18:24:14
3 in the context of the op-ed, the drafting and 18:24:19
4 publication of the op-ed, I would invoke the 18:24:22
5 attorney-client privilege on Ms. Heard's behalf. 18:24:26

6 MR. SCHWARTZ: I actually heard Mr. Chew's 18:24:29
7 question to be narrowly tailored to just the 18:24:32
8 representation and time period, so I'm not going 18:24:36
9 to instruct the witness not to answer beyond that. 18:24:37

10 A Well, I can't answer because of what 18:24:40
11 Ms. Bredehoft said. I don't get into the content. 18:24:43
12 Again, until there's a privilege waiver or the 18:24:47
13 Court orders, I can't get into discussions I had 18:24:49
14 prior to the time that I was consulted with 18:24:52
15 respect to the op-ed. 18:24:54

16 MR. CHEW: Okay. Now I'm going to ask a 18:24:56
17 question that's going to draw an instruction, so 18:24:58
18 nobody needs to get excited. 18:25:01

19 MR. CHEW: 18:25:01

20 Q So don't answer it -- 18:25:04

21 MR. CHEW: But I want a very concise 18:25:04
22 instruction. Okay? 18:25:07

1 Q Putting aside at any period of time, did 18:25:10
2 you have any conversations with Amber Heard about 18:25:12
3 whether she was physically abused by Johnny Depp 18:25:17
4 at any time? 18:25:20

5 MS. BREDEHOFT: And to the extent that 18:25:22
6 that calls for attorney-client communications 18:25:23
7 during -- before the representation of her in the 18:25:28
8 context -- actually, before or after in the 18:25:33
9 context of the op-ed, the review of the op-ed and 18:25:37
10 the drafting and publication, then I would invoke 18:25:43
11 the attorney-client communications. 18:25:45

12 If it is during and is part of the 18:25:47
13 representation of the -- in the scope of the 18:25:51
14 op-ed, then I would not invoke it then. 18:25:55

15 MR. SCHWARTZ: So instructed. 18:25:59

16 A So with that limitation, I cannot answer 18:26:01
17 the question other than to say that, during the 18:26:05
18 specific time period that I was engaged to advise 18:26:08
19 with respect to the op-ed, no, I did not have such 18:26:11
20 discussions in that narrow time frame. 18:26:14

21 Q Please describe all communications that 18:26:16
22 you had at any time with Ms. Heard, in 18:26:18

1 chronological order, about whether she was 18:26:25

2 physically abused by Johnny Depp at any time. 18:26:27

3 MS. BREDEHOFT: Okay. To the extent that 18:26:30

4 this question asks for your communications with 18:26:32

5 Amber Heard, either prior to or after your 18:26:38

6 representation of Ms. Heard in the context of 18:26:44

7 reviewing the op-ed drafts and publication, then I 18:26:50

8 would invoke the attorney-client privilege. If 18:26:55

9 it's during and within the context of that, I 18:26:59

10 would not, there. 18:27:02

11 MR. SCHWARTZ: And I would instruct the 18:27:03

12 witness not to answer accordingly. 18:27:04

13 A With that instruction, I cannot answer. 18:27:07

14 MR. CHEW: Okay. Let's move to the last 18:27:10

15 page of the op-ed. Alex, if you could please -- 18:27:12

16 keep going. Okay. Back one page. Back one page. 18:27:18

17 Okay. Right in the middle. 18:27:29

18 BY MR. CHEW: 18:27:33

19 Q Ms. Heard writes, "I write this as a woman 18:27:33

20 who had to change my phone number weekly because I 18:27:36

21 was getting death threats." 18:27:39

22 What does that refer to? 18:27:41

1	MS. BREDEHOFT: Objection. Calls for	18:27:43
2	speculation. Hearsay. Foundation.	18:27:46
3	Go ahead.	18:27:47
4	A Let me answer the same way I did the last.	18:27:49
5	To the extent that I have knowledge about that, it	18:27:53
6	was from prior to the time that I was engaged to	18:27:57
7	talk about or advise about op-ed.	18:27:59
8	MS. BREDEHOFT: Therefore, in that time	18:28:02
9	frame, I would invoke the attorney-client	18:28:04
10	privilege on behalf of Amber.	18:28:07
11	Q All right. So we can just make the	18:28:09
12	record, because we will be back here again: What	18:28:12
13	conversations, if any, did you have at any point	18:28:15
14	in time with Ms. Heard about this allegation here	18:28:19
15	that she writes as a woman who has had to change	18:28:24
16	her "phone number weekly," because she was getting	18:28:27
17	"death threats"?	18:28:29
18	MS. BREDEHOFT: Again, to the extent that	18:28:30
19	this calls for attorney-client communications	18:28:32
20	outside of the specific representation of Amber	18:28:35
21	Heard in the review of the drafts and publication	18:28:38
22	of the op-ed, I would invoke the attorney-client	18:28:41

1 privilege on Amber Heard's behalf. 18:28:45

2 MR. SCHWARTZ: And I would instruct the 18:28:47

3 witness not to answer to that extent. 18:28:49

4 A So again, with that limitation, I cannot 18:28:51

5 answer. 18:28:56

6 Q Mr. George, who is Tasya van Ree? 18:28:57

7 A I need a refresher. 18:29:05

8 Q Do you know that she was the former 18:29:07

9 girlfriend of Amber Heard? 18:29:11

10 A That's consistent with my recollection. 18:29:13

11 Q Did you know, at the time of the op-ed, 18:29:16

12 that Ms. Heard had been arrested for physically 18:29:19

13 assaulting Ms. van Ree at an airport in Washington 18:29:23

14 State? 18:29:28

15 MS. BREDEHOFT: Objection. Calls for 18:29:28

16 hearsay. Leading. Foundation. Speculation. And 18:29:31

17 to the extent it calls for attorney-client 18:29:38

18 communications outside of the representation of 18:29:41

19 the op-ed, I would also invoke the attorney-client 18:29:45

20 communications. 18:29:48

21 MR. SCHWARTZ: And I'll just add the 18:29:48

22 objection that it's vague as to whether or not 18:29:51

1 you're asking whether she was arrested at the time 18:29:53
2 the op-ed was written, or whether Mr. George had 18:29:56
3 knowledge at the time the op-ed was written, and 18:30:00
4 either way, I'll instruct Mr. George, not to 18:30:01
5 answer consistent with the implications of 18:30:03
6 privilege. 18:30:05

7 A I can make this easy. Again between those 18:30:05
8 -- within the narrow frame of my being engaged to 18:30:07
9 consult on the op-ed and the publication of the 18:30:10
10 op-ed, I did not have any such discussions with 18:30:14
11 her. And, prior to that, to the extent that I 18:30:17
12 did, I can't get into that without either a waiver 18:30:20
13 of the privilege or a court order. 18:30:23

14 Q I'm not after that. 18:30:25

15 After the complaint was filed, what, if 18:30:26
16 any, conversations did you have with Ms. Heard 18:30:29
17 about her arrest for physically assaulting 18:30:32
18 Tasya van Ree? 18:30:37

19 MS. BREDEHOFT: Objection. That would 18:30:37
20 call for attorney-client communications, and I 18:30:39
21 would invoke the attorney-client privilege on 18:30:42
22 behalf of Amber Heard. 18:30:46

Transcript of Eric George
April 5, 2021

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1	MR. SCHWARTZ: Also lack of foundation,	18:30:47
2	and I'll instruct the witness not to answer.	18:30:49
3	MS. BREDEHOFT: Lack of foundation,	18:30:51
4	speculation, hearsay.	18:30:54
5	MR. CHEW: You're instructing him not to	18:30:55
6	answer that, too?	18:30:57
7	MR. SCHWARTZ: Correct.	18:30:59
8	BY MR. CHEW:	18:31:00
9	Q Who is Paul Berese [ph].	18:31:01
10	A Paul Berese is a private investigator.	18:31:05
11	Q Did there come a time when you engaged	18:31:10
12	Mr. Berese to be a private investigator for	18:31:16
13	Ms. Heard with respect to Mr. Depp's defamation	18:31:21
14	case in Virginia?	18:31:24
15	MS. BREDEHOFT: I'm going to object on the	18:31:25
16	grounds that it calls for either attorney-client	18:31:27
17	communications or work product in connection with	18:31:31
18	representation, and I would invoke the privileges.	18:31:35
19	MR. SCHWARTZ: And I will assert the	18:31:38
20	attorney work product protection on Mr. George's	18:31:39
21	behalf and instruct him not to answer for the same	18:31:39
22	reason.	18:31:45

1 BY MR. CHEW: 18:31:45

2 Q Isn't it true that Mr. Berese was a male 18:31:46

3 adult film star before he moved into the area of 18:31:50

4 private investigation? 18:31:55

5 MS. BREDEHOFT: I'm going to object. 18:31:57

6 Leading. Hearsay. Foundation. Calls for 18:31:58

7 speculation. And to the extent that this calls 18:32:03

8 for any information that would be associated with 18:32:05

9 work product, I would invoke that doctrine and 18:32:08

10 privilege, as well if there is any communication 18:32:13

11 with respect to attorney-client communications, I 18:32:15

12 would invoke that privilege. 18:32:17

13 MR. CHEW: Are you instructing him not to 18:32:19

14 answer? 18:32:21

15 MR. SCHWARTZ: I don't think the question 18:32:21

16 calls for that, but go ahead. 18:32:22

17 A I can certainly tell you I have no 18:32:24

18 personal information on that one. 18:32:26

19 Q But you did engage him as an investigator 18:32:30

20 in the context of the Virginia case, correct? 18:32:33

21 MS. BREDEHOFT: I'm going to object. 18:32:36

22 A I didn't say that. 18:32:39

1 MR. SCHWARTZ: Go ahead, Elaine. 18:32:42

2 MS. BREDEHOFT: That was already asked and 18:32:44
3 answered. I've already objected on the basis of 18:32:46
4 work product and, potentially, attorney-client 18:32:47
5 privilege, and I'm invoking those. 18:32:51

6 MR. SCHWARTZ: And I'll object on the 18:32:54
7 basis of the attorney work product protection and 18:32:56
8 instruct the witness not to answer on the basis 18:32:59
9 for that. 18:33:02

10 MR. CHEW: Well, all of this has been 18:33:02
11 waived, but we're going to fight this another day. 18:33:04
12 So please be very quick in your instructions not 18:33:04
13 to answer so we can move on. But I have to make a 18:33:09
14 record, as you know. 18:33:10

15 BY MR. CHEW: 18:33:12

16 Q What tasks if any, did you give Mr. Berese 18:33:13
17 with respect to investigating Mr. Depp in the 18:33:17
18 context of the Virginia action? 18:33:21

19 MS. BREDEHOFT: I'm going to object, and 18:33:22
20 calls for hearsay, foundation, speculation, and to 18:33:24
21 the extent that it calls for any attorney-client 18:33:29
22 communications or work product associated with the 18:33:32

1 representation, I would invoke both the privilege 18:33:36

2 as well as the doctrine. 18:33:40

3 MR. SCHWARTZ: And I will object on the 18:33:42

4 basis of the attorney work product objection and 18:33:45

5 instruct the witness not to answer on the basis of 18:33:47

6 that protection. 18:33:49

7 MR. CHEW: All right. Let's turn, please, 18:33:53

8 Alex, to Exhibit 2. 18:33:55

9 (Whereupon, the above-referenced document 18:34:02

10 was marked as Exhibit No. 49.) 18:34:02

11 BY MR. CHEW: 18:34:02

12 Q Have you ever seen this document before? 18:34:14

13 A Yes. 18:34:16

14 Q What is it? 18:34:19

15 A This appears to be the counterclaims filed 18:34:21

16 on behalf of Ms. Heard against Mr. Depp. 18:34:24

17 Q What role, if any, did you play in the 18:34:27

18 drafting of these? 18:34:31

19 MS. BREDEHOFT: I will object to the 18:34:36

20 extent that it calls for any attorney-client 18:34:37

21 communications or work product, and I will invoke 18:34:41

22 it based on those. If you have any knowledge 18:34:45

1 outside of that, you can certainly answer. 18:34:48

2 A And do me a favor, Counsel, if you don't 18:34:50

3 mind just taking us to the last page so I can see 18:34:54

4 the date and the signature block for counsel. 18:34:57

5 MR. CHEW: Alex, if you could please look 18:35:00

6 to page 20. 18:35:02

7 Q So I'll ask you again: What role, if any, 18:35:20

8 did you play in the drafting of these 18:35:22

9 counterclaims? 18:35:27

10 MS. BREDEHOFT: Same objections. 18:35:27

11 Go ahead. 18:35:28

12 A I think none. 18:35:30

13 Q Who is Elaine Bredehoft? 18:35:32

14 A A stunning, brilliant, attractive woman 18:35:34

15 who I'm looking at in one of the squares of the 18:35:37

16 television screen in front of me. 18:35:41

17 Seriously, the successor counsel for 18:35:43

18 Ms. Heard. 18:35:49

19 Q Now when you say she's a "successor 18:35:50

20 counsel for Ms. Heard," was she your replacement? 18:35:53

21 A No. 18:35:58

22 Q Who was your replacement? 18:35:59

1 A The number of attorneys who appeared on 18:36:01
2 that -- one of the pleadings that you and I 18:36:05
3 discussed together. 18:36:09

4 Q Was that Robbie Kaplan and her gang? 18:36:10

5 A That's exactly right. 18:36:13

6 Q Do you know why Robbie Kaplan was selected 18:36:14
7 to replace you? 18:36:18

8 MS. BREDEHOFT: Objection to the extent 18:36:19
9 that that calls for attorney-client communications 18:36:21
10 or work product, and I would invoke the privileges 18:36:25
11 on that. 18:36:30

12 MR. SCHWARTZ: And I'll instruct the 18:36:31
13 witness to the extent that it calls for an 18:36:33
14 attorney-client communication, not to answer that. 18:36:37
15 To the extent you know outside of that, you may 18:36:39
16 answer. 18:36:42

17 A Yeah, the question is not entirely 18:36:43
18 accurate as phrased, but I think that gets into a 18:36:45
19 privileged discussion that I shouldn't have. 18:36:48

20 Q So just for the record, you're refusing to 18:36:50
21 answer, correct? 18:36:52

22 A Yes. 18:36:54

1 Q Okay. Why was Ms. Kaplan fired and 18:36:55

2 replaced by Ms. Bredehoft? 18:37:00

3 MS. BREDEHOFT: Objection to the extent 18:37:02

4 that it calls for attorney-client communications 18:37:04

5 or work product, I would invoke those. 18:37:06

6 MR. SCHWARTZ: Lack of personal knowledge. 18:37:09

7 A I don't know. 18:37:12

8 Q Well, that's a pretty good hint telling 18:37:13

9 him he didn't have personal knowledge. 18:37:16

10 MR. SCHWARTZ: Well, that's a question 18:37:17

11 that's objectable. 18:37:19

12 A I'm unhintable, and the answer is: I 18:37:21

13 don't know. 18:37:21

14 MR. CHEW: Okay. Let's go to -- 18:37:25

15 MS. BREDEHOFT: I was hoping you were 18:37:25

16 going to say because I was beautiful, brilliant, 18:37:28

17 and all those wonderful things; and thank you, 18:37:29

18 Ben, for not moving to strike that. 18:37:32

19 MR. CHEW: No, I agreed. I was nodding my 18:37:34

20 head in agreement. 18:37:37

21 THE WITNESS: That's true, I witnessed it. 18:37:41

22 MR. CHEW: As Alex will tell you of our 18:37:43

1 conversation before. 18:37:45

2 BY MR. CHEW: 18:37:46

3 Q So let's go to page 1 of the 18:37:47

4 counterclaims, the first allegation, paragraph 1, 18:37:50

5 it says, "Before he was even married to Ms. Heard, 18:37:55

6 Mr. Depp threatened to kill her and otherwise harm 18:38:04

7 her in private messages to friends." 18:38:06

8 Did you ever discuss that subject with 18:38:12

9 Ms. Heard? 18:38:14

10 MR. SCHWARTZ: Objection. Asked and 18:38:15

11 answered. Why is this document changing any of 18:38:16

12 the previous questions you've asked? 18:38:20

13 MS. BREDEHOFT: Yeah. 18:38:24

14 BY MR. CHEW: 18:38:24

15 Q You may answer. I don't hear an 18:38:28

16 objection. 18:38:30

17 MS. BREDEHOFT: To the extent it calls for 18:38:31

18 attorney-client privilege or work product, I would 18:38:33

19 invoke the privileges. 18:38:34

20 MR. SCHWARTZ: And I will instruct the 18:38:35

21 witness not to answer based on that. 18:38:36

22 A I can't answer with the prior limitations 18:38:38

1 we've discussed. 18:38:41

2 Q Did Ms. Heard ever tell you, in words or 18:38:42

3 substance, that Mr. Depp really threatened to kill 18:38:45

4 her -- why on earth she would end up marrying him? 18:38:50

5 MS. BREDEHOFT: Objection. To the extent 18:38:54

6 it calls for attorney-client communications or 18:38:55

7 work product, I would invoke such privileges. 18:38:58

8 MR. SCHWARTZ: And I will instruct the 18:39:01

9 witness not to answer, and add objections on the 18:39:02

10 basis of either mischaracterizing either witness 18:39:04

11 testimony or facts not in evidence. 18:39:07

12 A I can't answer, based on privilege. 18:39:09

13 Q Okay. Moving down in the paragraph, 18:39:11

14 Ms. Heard alleges, "Once Ms. Heard escaped from 18:39:16

15 marriage - only after obtaining a domestic 18:39:20

16 violence or restraining order from a California 18:39:23

17 court." 18:39:26

18 Do you know whether that was an 18:39:27

19 evidentiary hearing, or was it an ex parte 18:39:29

20 hearing? 18:39:33

21 MS. BREDEHOFT: Objection to the extent 18:39:34

22 that if your knowledge comes from attorney-client 18:39:35

1 communications or work product. If you're able to 18:39:39
2 answer outside of that, I have no objection. 18:39:41
3 MR. SCHWARTZ: So instructed. 18:39:43
4 A Mr. Chew, I am not the one who sought to 18:39:44
5 procure that domestic violence restraining order. 18:39:48
6 I can't answer that. 18:39:48
7 Q You really don't know, one way or another, 18:39:53
8 whether it was ex parte or evidentiary hearing? 18:39:55
9 A I have a -- 18:39:58
10 MS. BREDEHOFT: Objection. Objection. 18:39:59
11 Hearsay. Foundation. Calls for speculation. 18:40:01
12 A I have an understanding that's not 18:40:07
13 personal knowledge, so anything I'm telling you 18:40:12
14 either came from the client or it might not be 18:40:15
15 accurate. 18:40:19
16 MS. BREDEHOFT: And I will invoke the 18:40:19
17 privilege. 18:40:21
18 MR. SCHWARTZ: And I will instruct the 18:40:22
19 witness not to answer anything that came from the 18:40:24
20 client. 18:40:26
21 BY MR. CHEW: 18:40:27
22 Q Well, let's get the record clear, because 18:40:27

1 I don't want to be accused of not asking the 18:40:31
2 question: Did you ever discuss with Amber Heard, 18:40:34
3 at any time, whether the TRO hearing was ex parte 18:40:36
4 or evidentiary? 18:40:42

5 MS. BREDEHOFT: Objection to the extent 18:40:43
6 that it calls for attorney-client communications 18:40:45
7 or work product, and we would invoke the privilege 18:40:47
8 on that. 18:40:52

9 MR. SCHWARTZ: Similar. So instructed. 18:40:52

10 MR. CHEW: Okay. Let's move to 18:41:03
11 Exhibit 12, please. 18:41:06

12 (Whereupon, the above-referenced document 18:41:07
13 was marked as Exhibit No. 50.) 18:41:07

14 BY MR. CHEW: 18:41:07

15 Q Mr. George have you ever seen this 18:41:21
16 document before? 18:41:23

17 A Do me a favor, if you could instruct Alex 18:41:27
18 to scroll down a bit, so I can read it. 18:41:32

19 MR. CHEW: Yeah. Thank you. 18:41:35

20 Alex, if you can slowly scroll through it, 18:41:36
21 it's only three pages. 18:41:40

22 THE WITNESS: Okay. Thanks, Alex. You 18:41:54

1 can keep scrolling down slowly until you get to 18:41:57
2 the signature block. 18:42:00

3 A I don't believe I've ever seen this 18:42:20
4 before. 18:42:20

5 Q Do you know who Jennifer Howell is? 18:42:22

6 A Other than what I've just seen scrolling 18:42:24
7 through this quickly, no. 18:42:27

8 Q Okay. 18:42:30

9 A Not that I recollect. 18:42:30

10 MR. CHEW: Alex, if we can move back to 18:42:33
11 page 2, paragraph 8. The top. Perfect. 18:42:35

12 BY MR. CHEW: 18:42:40

13 Q Who is Page Heard? 18:42:40

14 MS. BREDEHOFT: I would object to asking 18:42:42
15 any questions based on this document, given the 18:42:44
16 witness's testimony that he's never seen the 18:42:47
17 document before and doesn't know who 18:42:50
18 Jennifer Howell is. So using the document as a 18:42:52
19 basis for any questions is inappropriate. 18:42:55

20 MR. SCHWARTZ: Lack of foundation. 18:42:59

21 MS. BREDEHOFT: Yeah, lacks foundation. 18:43:01
22 Hearsay. Just not appropriate. 18:43:03

1 BY MR. CHEW: 18:43:06

2 Q Who is Page Heard? 18:43:06

3 A So just seeing the top line of the 18:43:08

4 declaration, she appears to be Amber's mother, and 18:43:13

5 I have no reason to disagree that that's accurate. 18:43:18

6 Q Did you ever, at any time, meet 18:43:20

7 Page Heard? 18:43:23

8 A No. 18:43:24

9 Q Did you ever meet Amber Heard's father? 18:43:24

10 A No. 18:43:29

11 Q What, if any, discussions, did you have 18:43:29

12 around the time of the op-ed with your client 18:43:40

13 relating to her relationship with Elon Musk? 18:43:46

14 MS. BREDEHOFT: I'm going to object, 18:43:53

15 because I don't think that the question limits 18:43:54

16 sufficiently to within the scope of the 18:43:57

17 communication relating to the representation of 18:44:00

18 the op-ed. To the extent that it would call for 18:44:03

19 attorney-client communications in the context 18:44:08

20 outside of the scope of the representation of the 18:44:13

21 op-ed, I would invoke the privilege, and also work 18:44:15

22 product. If it's within the scope, then, 18:44:20

1 obviously, I don't have that objection. 18:44:22

2 MR. SCHWARTZ: And I will instruct the 18:44:24

3 witness accordingly not to answer or reveal any 18:44:25

4 attorney-client communications that happened 18:44:29

5 outside the context of the drafting of the op-ed. 18:44:31

6 MR. CHEW: For all these questions -- 18:44:33

7 we're going to do it two ways. I was very clear 18:44:34

8 that I was asking in the context of the op-ed. 18:44:36

9 For all these questions, I'm going to say - 18:44:39

10 BY MR. CHEW: 18:44:39

11 Q During the scope of the op-ed 18:44:43

12 representation, what, if any -- did you have any 18:44:46

13 conversations with Ms. Heard about her 18:44:50

14 relationships with Elon Musk? 18:44:53

15 MS. BREDEHOFT: You didn't say that. You 18:44:56

16 said something different. 18:44:58

17 BY MR. CHEW: 18:44:59

18 Q So go ahead. 18:45:01

19 A Guys, I can make this one easy, too. I 18:45:01

20 don't believe that, in the time period for which 18:45:04

21 the privilege has been waived commencing with my 18:45:06

22 being asked about a forthcoming op-ed and then the 18:45:11

1 publication of it, that I had any conversations 18:45:16

2 with her about Elon Musk. 18:45:18

3 Q Okay. Now, let's take the next period. 18:45:20

4 At any time after the publication of the op-ed, 18:45:24

5 did you have any communications, written or oral, 18:45:28

6 with Amber Heard about her relationship with 18:45:32

7 Elon Musk? 18:45:35

8 MS. BREDEHOFT: And I'm going to object to 18:45:37

9 the extent that it calls for hearsay, foundation, 18:45:39

10 speculation, and then to the extent it calls for 18:45:43

11 attorney-client communications outside the scope 18:45:46

12 of the representation for the op-ed or work 18:45:48

13 product, that I would invoke the privileges. 18:45:51

14 MR. SCHWARTZ: And I'll also object on the 18:45:53

15 basis of the attorney work product protection and 18:45:55

16 instruct the witness not to answer. 18:45:58

17 MR. CHEW: I think he has to tell me 18:46:01

18 whether he had any communications with Amber Heard 18:46:02

19 about her relationship with Elon Musk, and then 18:46:04

20 you can instruct him not to answer, but I'm 18:46:07

21 entitled to know whether he had them. 18:46:10

22 MS. BREDEHOFT: I don't agree. That goes 18:46:12

1 to content and, in Virginia, it's not permitted. 18:46:14

2 That goes to content. 18:46:17

3 MR. SCHWARTZ: And I'm limiting my 18:46:19

4 instruction because, Mr. Chew, you limited the 18:46:21

5 content of the conversation in your question. 18:46:24

6 BY MR. CHEW: 18:46:25

7 Q Did Ms. Heard ever tell you, at any point 18:46:26

8 in time, that Elon Musk had given her a Tesla, or 18:46:30

9 multiple Teslas? 18:46:40

10 MS. BREDEHOFT: I'm going to object to the 18:46:41

11 extent that it calls for attorney-client 18:46:43

12 communications outside the scope of the op-ed, 18:46:49

13 drafting and publication of the op-ed, or work 18:46:50

14 products, and I would invoke the privileges. 18:46:53

15 MR. SCHWARTZ: And I'll also object on the 18:46:55

16 basis of attorney work product protection and 18:46:56

17 instruct the witness not to answer the question. 18:46:59

18 BY MR. CHEW: 18:47:01

19 Q You're following that instruction, I 18:47:02

20 assume? 18:47:04

21 A Yes. 18:47:05

22 Q Did Ms. Heard, at any time, inform you, in 18:47:05

1 words or substance, that Elon Musk was 18:47:12
2 controlling, abusive, and that she was in a legal 18:47:16
3 battle with him over the rights to embryos that 18:47:20
4 they had created together? 18:47:24

5 MS. BREDEHOFT: I'm going to object. 18:47:25
6 Again, to the extent that it calls for 18:47:27
7 attorney-client communications or work product. 18:47:29
8 Outside of the scope of the representation for the 18:47:31
9 op-ed, I would invoke the privilege. 18:47:34

10 MR. SCHWARTZ: And I'll object on the 18:47:37
11 basis of attorney work product protection and 18:47:40
12 instruct the witness not to answer the question. 18:47:42

13 BY MR. CHEW: 18:47:44

14 Q Did Ms. Heard inform you at any time that 18:47:44
15 she and Mr. Musk had created embryos together? 18:47:48

16 MS. BREDEHOFT: Again, I'm going to object 18:47:55
17 to the extent that it calls for attorney-client 18:47:57
18 privilege and work product if it's outside the 18:48:01
19 scope of the representation of the op-ed draft and 18:48:05
20 publication. And we're also just wildly out there 18:48:08
21 at this point, and this is such a waste of time. 18:48:15

22 MR. CHEW: Yeah, I know you think so. 18:48:17

1 MR. SCHWARTZ: And I'll instruct the 18:48:19

2 witness not to answer. 18:48:20

3 BY MR. CHEW: 18:48:21

4 Q Did Ms. Heard ever tell you, in words or 18:48:22

5 substance, that Elon Musk wanted to destroy the 18:48:25

6 embryos, and Amber tried to keep them to have a 18:48:28

7 baby? 18:48:32

8 MS. BREDEHOFT: I'm going to object to the 18:48:33

9 extent it calls for attorney-client communications 18:48:35

10 and work product to the extent that it's outside 18:48:37

11 the scope of the draft and publication of the 18:48:41

12 op-ed and invoke the privilege. 18:48:42

13 MR. SCHWARTZ: And I will instruct the 18:48:43

14 witness not to answer on that basis. 18:48:44

15 BY MR. CHEW: 18:48:48

16 Q Did Amber -- did Ms. Heard ever inform you 18:48:49

17 that she was involved in a romantic relationship 18:48:55

18 with Elon Musk after the ex parte TRO, but while 18:48:58

19 she was still married to Mr. Depp? 18:49:06

20 A I'm going to object to the extent that it 18:49:07

21 calls for attorney-client communication or work 18:49:11

22 product outside the scope of the representation 18:49:16

1 for the drafting and publication of the op-ed and 18:49:17

2 invoke the privilege. 18:49:21

3 MR. SCHWARTZ: And I will instruct the 18:49:22

4 witness not to answer. 18:49:23

5 BY MR. CHEW: 18:49:24

6 Q Who is Cara Delevigne, D-E-L-E-V-I-G-N-E? 18:49:25

7 MS. BREDEHOFT: That calls for hearsay. 18:49:32

8 Foundation. 18:49:34

9 A I'm going to need a refresher on that, 18:49:36

10 Mr. Chew. 18:49:36

11 Q Well, she is a British model. 18:49:42

12 A I'm still not able to put that name in 18:49:46

13 context. 18:49:49

14 Q Did Ms. Heard ever inform you that she 18:49:51

15 spent the night with Ms. Delevigne and Mr. Musk 18:49:56

16 three times after -- shortly after the issuance of 18:50:01

17 the ex parte TRO? 18:50:05

18 MS. BREDEHOFT: I'm going to object to the 18:50:07

19 extent that it calls for hearsay, foundation, 18:50:09

20 speculation, and hypothetical. But I'm also going 18:50:12

21 to object to the extent it calls for 18:50:15

22 attorney-client communications outside the scope 18:50:18

1 of the representation of the drafting and 18:50:21
2 publication of the op-ed, and also work product in 18:50:22
3 that same scope. 18:50:26

4 MR. SCHWARTZ: I'll also object on the 18:50:27
5 work product basis and I will instruct the witness 18:50:30
6 not to answer. 18:50:32

7 BY MR. CHEW: 18:50:33

8 Q Do you know who Josh Drew [ph] is? 18:50:34

9 A I do not offhand; and, again, I'd need to 18:50:37
10 have you refresh my recollection. 18:50:41

11 Q Did you ever see a copy of his deposition 18:50:43
12 testimony? 18:50:46

13 MR. SCHWARTZ: Lacks foundation. The 18:50:49
14 witness answered he doesn't know who he is. 18:50:51

15 A As I sit here today, Mr. Chew, I don't 18:50:54
16 have a recollection. 18:50:57

17 Q Did you ever discuss with Amber Heard the 18:50:59
18 subject of her pledge to give \$7 million to the 18:51:07
19 ACLU and the Children's Hospital of Los Angeles? 18:51:13

20 MS. BREDEHOFT: Objection to the extent it 18:51:18
21 calls for attorney-client communications outside 18:51:20
22 the scope of the representation for the op-ed and 18:51:22

1 drafting and publication, or work product outside 18:51:24

2 the scope, and I would invoke the privilege. 18:51:28

3 MR. SCHWARTZ: And I will instruct the 18:51:30

4 witness not to answer on that basis. 18:51:31

5 BY MR. CHEW: 18:51:33

6 Q Do you know, sitting here today, whether 18:51:34

7 your former client ever honored her pledges to 18:51:37

8 give \$7 million to the Children's Hospital of 18:51:41

9 Los Angeles and the ACLU? 18:51:45

10 MS. BREDEHOFT: Objection. Hearsay. 18:51:48

11 Foundation. Speculation. Calls for 18:51:49

12 attorney-client privilege. To the extent it's 18:51:53

13 outside the scope of the representation of the 18:51:55

14 drafting and publication of the op-ed or work 18:51:58

15 product on the same scope, I would invoke the 18:52:01

16 privilege. 18:52:03

17 MR. SCHWARTZ: And I will instruct the 18:52:03

18 witness not to answer to the extent any testimony 18:52:05

19 would reveal any attorney-client-privileged 18:52:08

20 communications. 18:52:13

21 BY MR. CHEW: 18:52:13

22 Q During the time frame leading up to the 18:52:13

1 publication of the op-ed, what, if any, 18:52:16
2 discussions did you have with the ACLU about 18:52:17
3 Ms. Heard's pledge to give \$3.5 million to that 18:52:20
4 organization? 18:52:25

5 MS. BREDEHOFT: Objection. Calls for 18:52:25
6 hearsay, foundation, speculation, and, based on 18:52:26
7 the question, I would object to the extent that it 18:52:29
8 calls for communications that are outside the 18:52:33
9 scope of the drafting and publication of the op-ed 18:52:36
10 and work product with the same scope, I invoke the 18:52:41
11 privilege. 18:52:44

12 MR. SCHWARTZ: Just to be clear, Ben, 18:52:44
13 you're asking about conversations between 18:52:45
14 Eric George and ACLU personnel? 18:52:48

15 MR. CHEW: Right. 18:52:51

16 MR. SCHWARTZ: Okay. I'm not going to 18:52:53
17 instruct the witness not to answer that. 18:52:55

18 MS. BREDEHOFT: I misunderstood it as 18:52:56
19 well. I'm not invoking attorney-client privilege 18:52:57
20 on that. 18:53:00

21 Go ahead. 18:53:01

22 THE WITNESS: I had no such discussions. 18:53:02

1 BY MR. CHEW: 18:53:04

2 Q Okay. Now taking -- at any period of time 18:53:04

3 -- strike that. 18:53:08

4 After the publication of the op-ed, what, 18:53:09

5 if any, conversations did you have with anyone 18:53:13

6 from the ACLU about Ms. Heard's pledge to donate 18:53:16

7 \$3.5 million to the ACLU? 18:53:23

8 A None. 18:53:25

9 Q Same question with the Children's Hospital 18:53:26

10 of Los Angeles: At any point in time, what 18:53:30

11 communications, if any, did you have with anybody 18:53:32

12 from the CHLA about Ms. Heard's pledge to give 18:53:34

13 them \$3.5 million? 18:53:41

14 A None. 18:53:43

15 Q What conversations, at any point in time, 18:53:43

16 did you have with Ms. Heard about her pledge to 18:53:46

17 donate \$3.5 million to the Children's Hospital of 18:53:52

18 Los Angeles? 18:53:57

19 MS. BREDEHOFT: Objection to the extent 18:53:58

20 that it calls for attorney-client communications 18:54:00

21 outside the scope of the representation of the 18:54:02

22 drafting and publication of the op-ed, or work 18:54:04

1 product privilege in the same scope, I would 18:54:09

2 invoke the privilege. 18:54:11

3 MR. SCHWARTZ: And I will instruct the 18:54:12

4 witness not to answer if that would reveal any 18:54:13

5 attorney-client communications. 18:54:17

6 MR. CHEW: Let's move ahead, please, to 18:54:24

7 Exhibit 8. 18:54:28

8 (Whereupon, the above-referenced document 18:54:45

9 was marked as Exhibit No. 51.) 18:54:45

10 BY MR. CHEW: 18:54:45

11 Q Have you ever seen this document before? 18:54:50

12 A I may have. I really don't, specifically, 18:54:51

13 recollect. 18:54:55

14 Q Did you ever speak to any member of the 18:54:56

15 press about your former client, Ms. Heard? 18:55:00

16 MS. BREDEHOFT: Objection. Calls for 18:55:04

17 hearsay, foundation, speculation. To the extent 18:55:08

18 it calls for work product -- I'm just thinking 18:55:14

19 that one through. 18:55:23

20 MR. CHEW: Yeah, I would. 18:55:24

21 MS. BREDEHOFT: I'm trying to think if 18:55:26

22 there would be an opportunity. The other 18:55:28

1 objection I have is that Judge Weitz has already 18:55:30
2 ruled in our case that we cannot discover 18:55:34
3 communications between counsel and the press, 18:55:36
4 specifically. 18:55:41

5 MR. CHEW: No. 18:55:41

6 MS. BREDEHOFT: Yeah, he did. 18:55:42

7 MR. CHEW: You've thought enough. 18:55:44

8 BY MR. CHEW: 18:55:47

9 Q Did you ever speak to the press about 18:55:48

10 Ms. Heard? 18:55:50

11 A To the best of my recollection, there was 18:55:51

12 a prepared statement that was put together, and 18:55:55

13 all communications were restricted to that. 18:56:00

14 Q All right. Why don't you look at the 18:56:06

15 second page of -- first of all, is that your 18:56:09

16 former client's picture that appears on the front 18:56:13

17 page of Exhibit A? 18:56:18

18 A Yes. 18:56:19

19 Q Okay. Now, let's turn to the second page. 18:56:19

20 Where it reads -- 18:56:26

21 MR. CHEW: Okay. Stop. 18:56:28

22 Q -- there's a reference to you, Mr. George, 18:56:31

1 "Heard's attorney, Eric George, told Fox News that 18:56:33
2 his client and Franco once lived in the same 18:56:37
3 apartment complex and were simply taking the 18:56:41
4 elevator at the same time." 18:56:44

5 What does that refer to? 18:56:46

6 MS. BREDEHOFT: Objection. Calls for 18:56:48
7 hearsay. Foundation. Speculation. 18:56:49

8 Go ahead. 18:56:51

9 A Well, what you're looking at, I believe, 18:56:53
10 is a -- I don't know if it's an e-mail, but I 18:57:03
11 believe it was a written statement that was 18:57:07
12 provided to not -- I don't know if it was just 18:57:08
13 this journalist or others in connection with a 18:57:14
14 particular story, and it was a response to a 18:57:17
15 question about Ms. Heard's relationship with 18:57:23
16 Mr. Franco. 18:57:27

17 Q Was Mr. Franco a client of yours at the 18:57:29
18 time? 18:57:29

19 A No. 18:57:33

20 Q Was it your understanding that 18:57:33
21 James Franco lived in the East Columbia building 18:57:40
22 near Johnny and Amber? 18:57:44

1 MS. BREDEHOFT: Objection. Hearsay. 18:57:46

2 Leading. Foundation. Speculation. Calls for, 18:57:48

3 potentially, attorney-client communications 18:57:52

4 outside the scope of the drafting and publication 18:57:56

5 of the op-ed. To the extent that it does, I would 18:57:59

6 invoke the privilege. 18:58:02

7 MR. SCHWARTZ: And I will instruct 18:58:04

8 accordingly. 18:58:05

9 BY MR. CHEW: 18:58:09

10 Q You're not answering my question? 18:58:09

11 A No, I'm going to follow whatever direction 18:58:11

12 I get on privilege. 18:58:14

13 Q Did you tell Fox News that Ms. Heard and 18:58:16

14 James Franco once lived in the same apartment 18:58:20

15 complex and were simply taking the elevator at the 18:58:24

16 same time? 18:58:28

17 MS. BREDEHOFT: Objection. Hearsay. 18:58:28

18 Leading. Foundation. Calls for speculation. 18:58:30

19 Go ahead. 18:58:35

20 A I don't recollect whether that's an 18:58:36

21 accurate statement of what I told a reporter, but 18:58:43

22 I think that anything that was communicated to 18:58:51

1 that reporter, again, would have been in a 18:58:53

2 writing. 18:58:55

3 Q So you told them this in writing? 18:59:00

4 MS. BREDEHOFT: Objection. Misstates the 18:59:03

5 testimony. Leading. Foundation. Calls for 18:59:05

6 speculation. Hearsay. 18:59:08

7 A Yeah, my point is -- and I'm just 18:59:09

8 straining to see it a little bit here, so bear 18:59:13

9 with me. But where the quotation begins, that, I 18:59:15

10 stand by. I imagine that they accurately recited 18:59:23

11 a statement that we had put together. But beyond 18:59:27

12 that, I don't have any recollection or confidence 18:59:30

13 that anything was accurately -- 18:59:34

14 Q Well, Mr. George you're anticipating. 18:59:38

15 You're jumping ahead. I haven't asked you about 18:59:40

16 the quote. I've asked you, very clearly, about 18:59:42

17 the paragraph before that. 18:59:45

18 MS. BREDEHOFT: I'm objecting to -- 18:59:47

19 MR. CHEW: Let me finish. 18:59:50

20 MS. BREDEHOFT: I'm objecting to you 18:59:51

21 interrupting his answer. 18:59:54

22 MR. CHEW: He wasn't answering. 18:59:55

1 BY MR. CHEW: 18:59:57

2 Q Did you, "yes," or "no," tell Fox News 18:59:57

3 that Ms. Heard and Mr. Franco once lived in the 18:59:59

4 same apartment complex and were just taking the 19:00:02

5 elevator at the same time? 19:00:06

6 MS. BREDEHOFT: Objection. Leading. 19:00:06

7 Hearsay. Foundation. Speculation. Misstates 19:00:08

8 testimony. 19:00:08

9 Go ahead. 19:00:11

10 A Sorry, Counsel, I have no recollection of 19:00:11

11 saying that. 19:00:14

12 Q Did you demand a retraction? 19:00:14

13 A I have no recollection of doing so. 19:00:16

14 Q All right. Then, we'll get to the 19:00:18

15 question you really wanted to address that I 19:00:21

16 hadn't asked for. It quotes you saying, "This 19:00:24

17 bogus story is just another lame attempt by 19:00:30

18 Johnny Depp and his team to spread deliberately 19:00:32

19 misleading information through the tabloid media 19:00:36

20 so that he can continue to attack and abuse his 19:00:40

21 ex-wife." 19:00:43

22 Did you say that? 19:00:44

1 A I believe so. 19:00:45

2 Q What is the basis for that statement? 19:00:46

3 MS. BREDEHOFT: Objection. Calls for 19:00:49

4 hearsay, and to the extent it calls for 19:00:52

5 attorney-client communications, then we're outside 19:00:55

6 the scope of the representation for the drafting 19:01:00

7 and publication of the op-ed. It would be 19:01:03

8 privileged and we would invoke the privilege, and 19:01:08

9 also work product. 19:01:10

10 MR. SCHWARTZ: I will also assert the 19:01:11

11 attorney work product protection as an objection 19:01:17

12 and instruct the witness not to answer as the 19:01:17

13 basis for that statement. 19:01:20

14 MR. CHEW: Okay. 19:01:21

15 BY MR. CHEW: 19:01:23

16 Q And then you make the following statement 19:01:23

17 to the press, "Johnny Depp and his team have been 19:01:25

18 trying - and failing - to place a salacious story 19:01:29

19 based on this irrelevant footage for weeks. It's 19:01:33

20 pathetic." 19:01:37

21 What basis did, if any, did you have for 19:01:39

22 making that statement to the press? 19:01:40

1 MS. BREDEHOFT: Objection. To the extent 19:01:41
2 that it calls for attorney-client communications 19:01:44
3 outside the scope of the representation of the 19:01:46
4 drafting and publication of the op-ed, and also 19:01:48
5 work product, I would invoke -- 19:01:52
6 MR. SCHWARTZ: I also object on the basis 19:01:55
7 of the attorney work product protection, and 19:01:57
8 instruct the witness not to answer the question. 19:01:59
9 MR. CHEW: All right. I'm just making the 19:02:03
10 record here. 19:02:06
11 BY MR. CHEW: 19:02:06
12 Q What "deliberately misleading information" 19:02:07
13 did Johnny Depp and his team spread, that you're 19:02:09
14 referring to in this story? 19:02:14
15 MS. BREDEHOFT: To the extent that that 19:02:16
16 calls for attorney-client communications outside 19:02:18
17 the scope of the representation for the drafting 19:02:20
18 and publication of the op-ed, and work product 19:02:25
19 outside that, I would invoke the privileges. 19:02:29
20 MR. SCHWARTZ: And I'll reiterate the 19:02:33
21 attorney work product protection as an objection, 19:02:36
22 and instruct the witness not to answer on that 19:02:39

1	basis.	19:02:41
2	MR. CHEW: So is it your position that he	19:02:41
3	was representing the newspaper?	19:02:44
4	MR. SCHWARTZ: No.	19:02:45
5	MR. CHEW: All right. Let's look at	19:02:50
6	Exhibit 9.	19:02:53
7	THE WITNESS: I don't want to be rude.	19:02:53
8	I'm just going to take 30 seconds and send a text	19:02:56
9	here.	19:03:01
10	MR. CHEW: Why don't we do this. Why	19:03:02
11	don't we take five minutes, because I've got to	19:03:03
12	take a break anyway, and then I'd like to ask	19:03:07
13	Madam Court Reporter or the videographer how much	19:03:11
14	time we have left -- or how much time we have used	19:03:13
15	up.	19:03:18
16	THE VIDEOGRAPHER: You're about 2:23 right	19:03:19
17	now.	19:03:22
18	MR. CHEW: Okay. So we've got an hour and	19:03:23
19	seven. Okay. All right. Let's take -- yeah,	19:03:31
20	let's take five minutes.	19:03:35
21	THE WITNESS: Thank you, Counsel.	19:03:37
22	THE VIDEOGRAPHER: Off the record at 7:03.	19:03:39

1	(Whereupon, the court reporter noted the	19:03:39
2	witness's time as 4:03 p.m. Pacific.)	19:13:03
3	(A recess was taken.)	19:13:03
4	THE VIDEOGRAPHER: We're back on the	19:14:04
5	record at 7:14.	19:14:21
6	(Whereupon, the court reporter noted the	19:14:21
7	witness's time as 4:14 p.m. Pacific.)	19:14:21
8	MR. CHEW: Good afternoon again,	19:14:25
9	Mr. George.	19:14:26
10	Alex, if you could please show Mr. George,	19:14:28
11	our Exhibit 9.	19:14:31
12	(Whereupon, the above-referenced document	19:14:32
13	was marked as Exhibit No. 52.)	19:14:32
14	MR. CHEW: And Alex, if you can slowly go	19:14:42
15	through the five pages in this exhibit.	19:14:44
16	BY MR. CHEW:	19:14:55
17	Q Mr. George, you can tell him to stop	19:14:56
18	whenever you want to.	19:14:58
19	A No, that's good.	19:14:58
20	MR. CHEW: Okay. Let's see if you can	19:15:23
21	move up a little bit. Stay on that page. Okay.	19:15:27
22	Let's stop right here.	19:15:35

1 BY MR. CHEW: 19:15:37

2 Q Okay. Have you ever seen the document, 19:15:38

3 Exhibit 9, before, Mr. George? 19:15:40

4 A (No response.) 19:15:40

5 Q Sir? 19:16:00

6 A I'm sorry, I'm just reading it. 19:16:00

7 Q Okay. 19:16:04

8 A I don't know that I ever saw this 19:16:14

9 particular document. I may well have, I just 19:16:16

10 don't specifically recall as I'm sitting here 19:16:20

11 today. 19:16:21

12 Q Okay. Well, did you tell the reporter -- 19:16:22

13 let me just read to you at the top of the last 19:16:25

14 page of Exhibit 9. It states, "Heard's lawyer, 19:16:30

15 Eric George, denied the allegations against the 19:16:34

16 actress, saying in a statement obtained by PEOPLE, 19:16:37

17 'The evidence in this case is clear: Johnny Depp 19:16:42

18 repeatedly beat Amber Heard.'" 19:16:45

19 Do you see that? 19:16:49

20 A Yes. 19:16:49

21 Q Did you ever make that statement to the 19:16:49

22 press? 19:16:51

1 to the extent that it calls for attorney-client 19:17:38
2 communications outside of the scope of the 19:17:41
3 representation of the drafting and publication of 19:17:44
4 the op-ed and also work product, and will invoke 19:17:47
5 those privileges. 19:17:49

6 BY MR. CHEW: 19:17:53

7 Q What communications, if any, did you have 19:17:53
8 with Amber Heard about your allegation here that 19:17:56
9 Johnny Depp "repeatedly" beat her? 19:17:59

10 MS. BREDEHOFT: I'm going to object to the 19:18:02
11 extent that it calls for attorney-client 19:18:04
12 communications outside the representation of Amber 19:18:06
13 for the drafting and publication of the op-ed, and 19:18:09
14 also work product privileges, and invoke those. 19:18:12

15 MR. SCHWARTZ: I'll add asked and 19:18:15
16 answered, and I'll instruct the witness not to 19:18:18
17 answer to the extent that the answer reveals 19:18:20
18 communications outside the limited scope we've 19:18:25
19 been discussing. 19:18:28

20 BY MR. CHEW: 19:18:28

21 Q What did your investigator, Paul Berese, 19:18:28
22 write you or write you about what he had 19:18:33

1 discovered about the allegation concerning 19:18:36

2 Mr. Depp beating Amber Heard? 19:18:39

3 MS. BREDEHOFT: I'm going to object to the 19:18:41

4 extent that calls for hearsay, foundation, 19:18:43

5 speculation, and then also to the extent that it 19:18:46

6 calls for attorney work product outside the scope 19:18:49

7 of the representation for the op-ed, for the 19:18:52

8 drafting and publication of the op-ed. I would 19:18:54

9 invoke that privilege. 19:18:57

10 MR. SCHWARTZ: And I'll also object on the 19:18:59

11 basis of attorney work product and instruct the 19:19:01

12 witness not to answer. 19:19:04

13 BY MR. CHEW: 19:19:05

14 Q Isn't it true that Mr. Berese told you he 19:19:06

15 came up with no one that could corroborate 19:19:09

16 Ms. Heard's allegations? 19:19:12

17 MS. BREDEHOFT: Objection. Leading. 19:19:13

18 Hearsay. Foundation. And then to the extent it 19:19:15

19 calls for work product outside the representation 19:19:17

20 -- outside the scope of the representation for the 19:19:20

21 drafting and publication of the op-ed, I would 19:19:23

22 invoke the privilege. 19:19:26

1 MR. SCHWARTZ: And I will also reiterate 19:19:28
2 the attorney work product objection and instruct 19:19:29
3 the witness not to answer on the basis of that 19:19:32
4 protection. 19:19:35

5 BY MR. CHEW: 19:19:35

6 Q Sitting here today, Mr. George, are you 19:19:36
7 aware of any woman in the universe, other than 19:19:38
8 Ms. Heard, who ever alleged that Mr. Depp 19:19:42
9 physically abused them? 19:19:45

10 MS. BREDEHOFT: Objection. To the extent 19:19:47
11 that it calls for attorney-client privilege, 19:19:48
12 outside the scope of the representation for the 19:19:54
13 drafting and publication of the op-ed and to the 19:19:55
14 extent it calls for work product outside the scope 19:20:01
15 of the representation of the op-ed, I would invoke 19:20:05
16 both the privileges and the document. 19:20:08

17 MR. SCHWARTZ: And I will reiterate that 19:20:10
18 attorney work product protection objection and 19:20:12
19 instruct the witness not to answer on that basis. 19:20:14

20 MR. CHEW: So it's your position that 19:20:16
21 Mr. George, talented as he is, represents every 19:20:24
22 other woman in the universe? 19:20:26

1 MR. SCHWARTZ: That's not how that works. 19:20:28

2 MS. BREDEHOFT: No, it's not. 19:20:30

3 MR. CHEW: Okay. All right. Let's look 19:20:33

4 at Exhibit No. 10. 19:20:34

5 (Whereupon, the above-referenced document 19:20:35

6 was marked as Exhibit No. 53.) 19:20:47

7 MR. CHEW: Okay. If you can move through 19:20:47

8 this one. We'll see our hero again, towards the 19:20:51

9 end. 19:20:56

10 BY MR. CHEW: 19:21:26

11 Q Okay. Let me ask you a question. Putting 19:21:26

12 aside any communications with your former client, 19:21:29

13 Amber Heard, are you aware of any other woman who 19:21:32

14 has accused Mr. Depp of physical abuse, other than 19:21:35

15 Ms. Heard? 19:21:38

16 MS. BREDEHOFT: Objection to the extent 19:21:39

17 that it calls for work product outside the scope 19:21:41

18 of the representation. Since Mr. Chew has phrased 19:21:43

19 it outside communications with Ms. Heard, I'm not 19:21:49

20 invoking that privilege, but I am invoking the 19:21:52

21 work product doctrine. 19:21:55

22 MR. SCHWARTZ: And I will reiterate the 19:21:57

1 protection on the basis of attorney work product 19:21:58
2 protection, and instruct the witness not to answer 19:22:00
3 on that basis. 19:22:02
4 MR. CHEW: Okay. Alex, could you stop, 19:22:03
5 please. Move just a little further down, so I can 19:22:05
6 see where you are. Okay. Stop. Go back to 19:22:08
7 page 9, please, Alex. Okay. That's it. Stop 19:22:12
8 right there, please. 19:22:18
9 BY MR. CHEW: 19:22:20
10 Q Have you ever seen this document before, 19:22:20
11 Exhibit 10? 19:22:22
12 A I don't know about the particular 19:22:24
13 document, but the quote is familiar to me. 19:22:26
14 Q Who is Mike Walters? 19:22:31
15 A I gather that -- take me to the very top, 19:22:38
16 is he the author? 19:22:44
17 Q He is the author. Does he work for The 19:22:45
18 Blast or did he work for The Blast at the time you 19:22:48
19 made the statement? 19:22:51
20 MS. BREDEHOFT: Objection. Hearsay, 19:22:51
21 foundation. 19:22:54
22 MR. CHEW: All right. Okay. I was trying 19:22:54

1 to do this quickly, but we won't. 19:22:58

2 BY MR. CHEW: 19:22:58

3 Q What's "The Blast"? 19:23:03

4 A It's an entertainment-related publication. 19:23:04

5 Q Did you tell a reporter for The Blast, 19:23:07

6 quote, "This bogus story is just another lame 19:23:11

7 attempt by Johnny Depp and his team to spread 19:23:15

8 deliberately misleading information through the 19:23:19

9 media so he can continue to attack and abuse his 19:23:21

10 ex-wife"? 19:23:26

11 (Whereupon, a phone rings.) 19:23:26

12 THE WITNESS: Sorry about that guys, hang 19:23:33

13 on one second. 19:23:35

14 A Okay. Subject to this, in fact, being 19:23:41

15 part of a statement that was released and not any 19:23:45

16 direct communication that I had with The Blast or 19:23:51

17 one of its reporters, yes, I did. 19:23:53

18 Q Well, explain what you mean, in English. 19:23:55

19 A Okay. I'll do it again. Subject to it 19:23:59

20 being the case that I communicated through a 19:24:04

21 statement, a written statement, and that it may 19:24:06

22 have been provided to The Blast, as well as 19:24:11

1 others, without my having specifically 19:24:13
2 communicated with The Blast or one of its 19:24:15
3 reporters, yes, that statement went out over my 19:24:18
4 name. 19:24:23

5 Q So did you communicate with the press 19:24:23
6 through intermediaries? 19:24:26

7 A So I don't know how this statement was 19:24:27
8 specifically provided to the press. That is not 19:24:32
9 something that I believe I did at all in this 19:24:36
10 case. But I was responsible, ultimately, for the 19:24:40
11 statement itself that was put out that we're 19:24:45
12 looking at. 19:24:47

13 Q Who put it out? 19:24:48

14 A I don't know if it was somebody else on 19:24:53
15 the team. 19:24:56

16 Q Who else on the team would have put it 19:25:00
17 out? 19:25:02

18 MS. BREDEHOFT: Objection. Calls for 19:25:04
19 speculation. Hearsay. Foundation. 19:25:06

20 Go ahead. 19:25:08

21 MR. CHEW: Wow, that's pretty amazing. 19:25:09

22 THE WITNESS: I can only guess who, in 19:25:14

1 particular, it might have been, but it wasn't me. 19:25:15

2 BY MR. CHEW: 19:25:18

3 Q Well, we're going to request -- how many 19:25:19

4 written statements did you make, or your firm, or 19:25:22

5 someone in the ozone make, using your name, to the 19:25:24

6 press making serious allegations against Mr. Depp? 19:25:28

7 MS. BREDEHOFT: Objection to the form of 19:25:31

8 the question. Hearsay. Foundation. Speculation. 19:25:34

9 Hypothetical. 19:25:37

10 MR. CHEW: It is not a hypothetical. This 19:25:39

11 is his statement. 19:25:41

12 BY MR. CHEW: 19:25:43

13 Q How many statements like this did you 19:25:43

14 release to the press in written form? 19:25:45

15 MS. BREDEHOFT: Objection. Hearsay. 19:25:48

16 Foundation. Speculation. 19:25:51

17 Go ahead. 19:25:51

18 A There were -- 19:25:52

19 MS. BREDEHOFT: Vague, as to "this." 19:25:56

20 THE WITNESS: I'm sorry, go ahead, 19:25:58

21 Counsel. 19:26:00

22 MS. BREDEHOFT: I said, "Vague as to 19:26:00

1 'this.'" 19:26:02

2 A Probably five or six. It could be fewer 19:26:03

3 than that. 19:26:08

4 MR. CHEW: We would request all five or 19:26:12

5 six, any statements you've made to the media 19:26:14

6 directly or indirectly relating to this action. 19:26:17

7 We hope you will provide those to us. 19:26:21

8 MS. BREDEHOFT: We will take under 19:26:25

9 consideration any request, and we will respond to 19:26:28

10 it in proper form when such a request is made. 19:26:30

11 BY MR. CHEW: 19:26:34

12 Q Do you know whether James Franco saw Amber 19:26:34

13 Heard in the days after the alleged incident on 19:26:43

14 May 16th, 2016, that became the subject of her ex 19:26:47

15 parte TRO? 19:26:53

16 MS. BREDEHOFT: Objection to the extent it 19:26:55

17 calls for attorney-client communications outside 19:26:56

18 of the scope of the representation of the drafting 19:26:58

19 and publication of the op-ed, or to the extent 19:27:01

20 that it calls for work product that was outside 19:27:04

21 the scope of the op-ed -- drafting and publication 19:27:07

22 of the op-ed, we would invoke the privileges. 19:27:11

1 BY MR. CHEW: 19:27:16

2 Q You may answer. 19:27:16

3 MR. SCHWARTZ: No, I'm instructing the 19:27:17

4 witness, accordingly, not to answer. 19:27:19

5 BY MR. CHEW: 19:27:21

6 Q Well, am I correct that May 16th -- strike 19:27:21

7 that. 19:27:21

8 Am I correct that May 21, 2016, is more 19:27:24

9 than two years prior to your client being 19:27:26

10 published in the op-ed? 19:27:30

11 A Correct. 19:27:31

12 Q So what conversations, if any, did you 19:27:32

13 have with Ms. Heard relating to Mr. Franco seeing 19:27:34

14 her after she was allegedly attacked on 19:27:39

15 May 21, 2016? 19:27:46

16 MS. BREDEHOFT: Objection to the form of 19:27:47

17 the question. Hearsay. Foundation. Speculation. 19:27:48

18 And then again, same objection as to calls for 19:27:50

19 attorney-client communications outside the scope 19:27:53

20 of the representation of the drafting of the 19:27:56

21 publication of the op-ed, and to the extent it 19:27:59

22 calls for work product, it's outside the scope of 19:28:02

1 the op-ed, we would so invoke the privileges and 19:28:06
2 doctrine. 19:28:10

3 MR. SCHWARTZ: And I will instruct the 19:28:10
4 witness not to answer on that basis. 19:28:11

5 BY MR. CHEW: 19:28:13

6 Q What about Elon Musk. Isn't it true that 19:28:13
7 Elon Musk was with your client in the days 19:28:15
8 immediately following the alleged incident on 19:28:19
9 May 21, 2016? 19:28:22

10 MS. BREDEHOFT: Objection to the extent 19:28:24
11 that it calls for attorney-client communications 19:28:25
12 outside the scope of the representation for the 19:28:28
13 drafting and publication of the op-ed, and to the 19:28:31
14 extent it calls for work product outside the scope 19:28:33
15 of the drafting and publication of the op-ed, I 19:28:37
16 would so invoke the privilege and doctrine. 19:28:40

17 MR. SCHWARTZ: And I will object on the 19:28:44
18 basis of the attorney work product protection, and 19:28:46
19 instruct the witness not to answer on the basis of 19:28:47
20 the privileges. 19:28:51

21 BY MR. CHEW: 19:28:52

22 Q Sir, isn't it glaringly obvious that the 19:28:52

1 ex parte TRO that Ms. Heard obtained with her 19:28:56
2 husband safely out of town on May 27th, 2016, was 19:29:00
3 the incident to which she was referring when she 19:29:03
4 said she became a public figure for domestic abuse 19:29:07
5 two years ago? 19:29:12

6 MS. BREDEHOFT: Objection to the extent 19:29:13
7 that it calls for attorney-client communication 19:29:14
8 outside of the scope of the drafting and 19:29:16
9 publication of the op-ed, and to the extent it 19:29:18
10 calls for work product, it's outside the scope of 19:29:21
11 the drafting and publication of the op-ed. 19:29:25

12 I also objection that it calls for 19:29:27
13 hearsay. Speculation. I will invoke the 19:29:29
14 privilege and the doctrine. 19:29:31

15 MR. SCHWARTZ: Maybe I was unclear on the 19:29:33
16 question. Is the question about the witness's 19:29:35
17 opinion, because, if so, it's an opinion 19:29:38
18 objection. If you're asking for some 19:29:40
19 communication between the attorney and the client, 19:29:43
20 I'm going to instruct the witness not to answer to 19:29:45
21 reveal any of those communications. 19:29:49

22 MR. CHEW: Would you -- Madame Court 19:29:51

1	Reporter, if you would please read the question	19:29:53
2	back.	19:29:53
3	(Whereupon, the court reporter read the	19:29:53
4	previous question.)	19:30:41
5	MR. SCHWARTZ: I'll object on the basis of	19:30:41
6	lacks personal knowledge, calls for speculation	19:30:43
7	and opinion.	19:30:46
8	I don't think that question calls for any	19:30:47
9	attorney-client communications, but to the extent	19:30:49
10	it would be required for you to reveal in your	19:30:51
11	answer, I would instruct you not to do so.	19:30:53
12	MS. BREDEHOFT: And I will just repeat my	19:30:55
13	earlier objection and instructions.	19:30:57
14	THE WITNESS: No.	19:30:59
15	BY MR. CHEW:	19:30:59
16	Q "No" what?	19:31:00
17	A "No."	19:31:01
18	MR. CHEW: All right. Let's take a look	19:31:03
19	at Exhibit 6.	19:31:05
20	(Whereupon, the above-referenced document	19:31:12
21	was marked as Exhibit No. 54.)	19:31:23
22	MR. CHEW: Okay. We're going to stay on	19:31:23

1 the first page. 19:31:25

2 BY MR. CHEW: 19:31:25

3 Q We're going to go to the -- Ms. Shulman's 19:31:26

4 e-mail to Ms. Heard, dated December 12th, 2018; do 19:31:31

5 you see that? 19:31:37

6 A I do. 19:31:40

7 Q Okay. If you move down to the bottom of 19:31:41

8 the page, after she says, "Hi Amber," she says, "I 19:31:45

9 miss this paragraph below too, which I think we 19:31:52

10 could rejigger slightly along these lines (changes 19:31:54

11 the bold), if there's a possibility of that: 19:31:58

12 'Then two years ago, after I got a temporary'" -- 19:32:03

13 MR. CHEW: Stop there. 19:32:03

14 (Speaking to technician.) 19:32:03

15 Q -- "'restraining order against my then 19:32:05

16 ex-husband.'" 19:32:10

17 What is Ms. Heard referring to there? 19:32:11

18 MS. BREDEHOFT: Objection, first of all, 19:32:14

19 to the misreading of the sentence, but also 19:32:16

20 hearsay. Foundation. And calls for speculation. 19:32:20

21 BY MR. CHEW: 19:32:25

22 Q Well, let me reframe the question. What 19:32:26

1 understanding, if any, do you have with respect to 19:32:28
2 the language, "Then two years ago, after I got a 19:32:32
3 temporary restraining order against my 19:32:36
4 then-husband." 19:32:39

5 What does that refer to? 19:32:39

6 MS. BREDEHOFT: Objection. Hearsay. 19:32:41
7 Foundation. Calls for speculation. To the extent 19:32:42
8 it would call for communications outside the 19:32:51
9 representation for the drafting and publication of 19:32:55
10 the op-ed, I would invoke the privilege and same 19:32:59
11 for the work product. 19:33:02

12 MR. SCHWARTZ: I would instruct the 19:33:04
13 witness not to answer to the extent this question 19:33:05
14 requires revealing such communications. 19:33:08

15 Q You're not going to answer that? 19:33:14

16 A I can't. 19:33:16

17 Q So you're actually -- okay. 19:33:18
18 Well, let's look at the e-mail on top of 19:33:24
19 that. 19:33:30

20 A Okay. 19:33:31

21 Q Do you see in the e-mail from Ms. Heard to 19:33:32
22 you and a gaggle of other people, 19:33:35

1 December 12, 2018, at 7:14 a.m.? 19:33:40

2 A I do. I think it's -- wait a second. I 19:33:46

3 think you've got the time wrong. Isn't it 19:33:51

4 12:17 a.m.? 19:33:55

5 Q All right, let me just ask you this, did 19:33:56

6 you receive this e-mail on or about 19:33:58

7 December 12th, 2018? 19:34:01

8 MS. BREDEHOFT: Objection to the form of 19:34:03

9 the question. 19:34:06

10 A Yes. 19:34:06

11 Q And you did, in fact, attach 19:34:06

12 Robin Shulman's e-mail to Amber Heard that we just 19:34:11

13 discussed, correct? 19:34:15

14 A I'm sorry, Counsel, I didn't hear you. 19:34:16

15 Say again. 19:34:18

16 Q Did this e-mail that you just admitted to 19:34:18

17 receiving on December 12, 2018, from Amber Heard, 19:34:21

18 attach Ms. Shulman's message? 19:34:26

19 MS. BREDEHOFT: Objection to the form of 19:34:29

20 the question, to the phrase "attach," but 19:34:35

21 otherwise, go ahead. 19:34:37

22 A Just so I'm clear, Counsel, you mean the 19:34:40

1 one that immediately follows it? 19:34:43

2 Q We're going to start at the beginning. 19:34:45

3 We're going to be back, but we're going to start 19:34:49

4 at the beginning. 19:34:51

5 Have you ever seen Exhibit 6 before? 19:34:52

6 A Yes. 19:34:55

7 Q Did you receive Exhibit 6 on or about 19:34:55

8 December 12th, 2018, "yes," or "no"? 19:34:58

9 A I've answered that, "yes." 19:35:00

10 Q Who was Sean Walsh -- is Sean Walsh a 19:35:01

11 lawyer? 19:35:01

12 A Sean Walsh is not an attorney. 19:35:07

13 Q Is Jennifer Robinson a U.S. lawyer? 19:35:08

14 A Not to my knowledge. 19:35:13

15 Q So Ms. Heard was sending this to you, her 19:35:14

16 lawyer, and two nonlawyers, correct? 19:35:22

17 A No. 19:35:27

18 MS. BREDEHOFT: Objection. Hearsay. 19:35:28

19 Foundation. Speculation. And misstates the 19:35:28

20 testimony, earlier testimony. 19:35:31

21 BY MR. CHEW: 19:35:34

22 Q How is that wrong? 19:35:34

1 A Ms. Robinson is a lawyer, as I understand 19:35:35

2 it. 19:35:39

3 Q But she's not a U.S. lawyer, correct? 19:35:39

4 A Correct. 19:35:42

5 Q Did you respond to Ms. Heard's e-mail? 19:35:43

6 A You would have to show me. I don't 19:35:50

7 recollect off the top of my head. 19:35:53

8 Q Okay. But you would agree with me that 19:35:55

9 Ms. Heard sent you the e-mail that appears below 19:36:00

10 that, to her from Robin Shulman, correct? 19:36:07

11 A Yes. But that was -- that accompanied the 19:36:12

12 e-mail that she had sent me, that's correct. 19:36:15

13 Q So you would have seen, on or about 19:36:17

14 December 12th, 2018, the exchange relating to, 19:36:19

15 "Then two years ago, after I got a temporary 19:36:25

16 restraining order against my then-husband." 19:36:28

17 You received that, correct? 19:36:33

18 A I would have received that, correct. 19:36:34

19 Q Did you have any understanding of who 19:36:36

20 Amber Heard's husband was two years ago? 19:36:41

21 A Yes. 19:36:46

22 Q And who was her husband? 19:36:47

1	A Johnny Depp.	19:36:49
2	Q And who was the husband against whom she	19:36:50
3	got a temporary restraining order?	19:36:53
4	A Mr. Depp.	19:36:56
5	Q Thank you.	19:36:57
6	MR. CHEW: All right. Let's look at	19:37:13
7	Exhibit 4, please.	19:37:15
8	(Whereupon, the above-referenced document	19:37:25
9	was marked as Exhibit No. 55.)	19:37:28
10	BY MR. CHEW:	19:37:28
11	Q Have you ever seen this document before?	19:37:29
12	A Yes.	19:37:40
13	Q What is it?	19:37:41
14	A It's an e-mail that I authored -- I'm just	19:37:44
15	straining to get the numbers right, but it looks	19:37:52
16	like, approximately, 1:28 a.m. on	19:37:55
17	December 12th, 2018.	19:37:59
18	Q Okay. Directing your attention to the top	19:38:00
19	of the first page, remind us who Sean Walsh is.	19:38:02
20	A So Sean Walsh is a colleague of mine who	19:38:06
21	is a consultant, who is not an attorney.	19:38:11
22	MR. CHEW: Okay. Good. Let's move on	19:38:11

1 then. I'd actually like to go to a document that 19:38:14
2 Ms. Bredehoft showed you. George Exhibit 20. We 19:38:18
3 can do this very quickly. 19:38:29
4 THE TECHNICIAN: This is Alex, the tech, 19:38:31
5 speaking. Mr. Chew, there was an 19 and a 21. 19:38:33
6 THE COURT REPORTER: She withdrew 20. 19:38:51
7 THE WITNESS: I think I have a 20. Just 19:38:51
8 to be clear on my end, 20 is an e-mail from AH, to 19:38:56
9 myself, dated 12/12/2018, at 3:10:00 a.m. 19:39:00
10 BY MR. CHEW: 19:39:06
11 Q Mr. George, do you see where Ms. Heard 19:39:07
12 refers to, quote, "my time constraints," unquote? 19:39:12
13 A Bear with me. 19:39:16
14 I do. 19:39:20
15 Q What did she mean by her "time 19:39:21
16 restraints"? 19:39:28
17 A I don't know. 19:39:33
18 Q What did she tell you about her "time 19:39:34
19 restraints"? 19:39:37
20 A The only recollection that I have about 19:39:38
21 this is that there was some sense of scheduling or 19:39:42
22 timing that was with respect to the ACLU and, 19:39:49

1 possibly, a publication, whether it was the 19:39:54
2 Washington Post or somebody else. But nothing 19:39:57
3 else that I was aware of. 19:40:00

4 Q Did you ask her what her time constraints 19:40:02
5 were? 19:40:06

6 A I don't know that we had any such 19:40:07
7 discussion, or if I asked her about it. 19:40:13

8 Q Wouldn't that be a question you would 19:40:15
9 normally ask, if a client says she's got time 19:40:17
10 constraints, wouldn't that beg the question what 19:40:21
11 are the time constraints and what's driving that? 19:40:25

12 MS. BREDEHOFT: Objection. Hearsay. 19:40:28
13 Foundation. Calls for speculation. 19:40:30

14 Go ahead. 19:40:30

15 A No, not necessarily. I think it was still 19:40:32
16 a significant number of days between the first 19:40:40
17 time that she reached out to me and when it was 19:40:46
18 actually published. I didn't -- go ahead. 19:40:49

19 Q Did she tell you, in words or substance, 19:40:53
20 that the ACLU wanted to publish it on a particular 19:40:55
21 date? 19:41:00

22 A In substance, I know -- and I don't know 19:41:01

1 if she told me or I just drew this conclusion from 19:41:05
2 the back and forth, that the ACLU was interested 19:41:07
3 in moving forward somewhat expeditiously. 19:41:11

4 Q But you testified earlier that you 19:41:16
5 represented Amber Heard, you didn't represent the 19:41:18
6 ACLU. Why would you give a darn about what the 19:41:21
7 ACLU agenda was? 19:41:25

8 MR. SCHWARTZ: Objection. Argumentative. 19:41:27
9 Leading. 19:41:29

10 MS. BREDEHOFT: Leading, hearsay, 19:41:29
11 foundation. 19:41:32

12 A What the ACLU wished to provide 19:41:34
13 substantively to the piece was of no consequence 19:41:39
14 to me. To the extent that I could facilitate the 19:41:43
15 scheduling so that the piece that was important to 19:41:48
16 Amber could get published was the objective, I was 19:41:49
17 fine with that. 19:41:53

18 Q Didn't she want to get it published at 19:41:54
19 that time to coincide with Aquaman? 19:41:58

20 A Again, that was never something that I was 19:42:01
21 told or heard from anybody else, or that I drew a 19:42:04
22 conclusion myself about in this process. 19:42:08

1 Q I'm not -- 19:42:08

2 A Counsel, let me just finish. I just want 19:42:12
3 to make sure it's on the record. 19:42:13

4 Or that I drew a conclusion based on my 19:42:16
5 interaction was, in fact, the case. 19:42:19

6 Q Really, you didn't -- sitting here today, 19:42:20
7 your testimony is that you don't remember what her 19:42:23
8 time constraints were, correct? 19:42:26

9 MS. BREDEHOFT: Objection, leading, 19:42:28
10 hearsay, foundation, and misstates the testimony. 19:42:30

11 Go ahead. 19:42:35

12 A Yeah, as I said at the beginning of this 19:42:35
13 part of the discussion, I don't have a specific 19:42:39
14 understanding of what the reference here to, 19:42:40
15 quote, my "time constraints," is. 19:42:46

16 But I want to be equally clear, at no 19:42:51
17 point in time was it communicated to me or did I 19:42:54
18 draw any conclusion that that had anything to do 19:42:57
19 with any film. 19:43:00

20 MR. CHEW: Objection. Let's look at 19:43:01
21 Exhibit 7. 19:43:03

22 THE WITNESS: I'm sorry, Mr. Chew is that 19:43:18

1 No. 7? 19:43:21

2 BY MR. CHEW: 19:43:21

3 Q Yes, that is No. 7. 19:43:22

4 Who is Jessica Weitz? 19:43:24

5 MR. SCHWARTZ: Objection. Lacks 19:43:27

6 foundation. 19:43:29

7 BY MR. CHEW: 19:43:30

8 Q Well, I'm asking: Who is Jessica Weitz? 19:43:31

9 A So based on what you're showing me, but 19:43:38

10 nothing on else, I would assume that she is the 19:43:40

11 director of artist engagement at the ACLU. 19:43:43

12 Q She writes to Ms. Heard, "This was worth 19:43:50

13 all the orchestrations. Robin - Thank you for 19:43:55

14 birthing this, and, Amber, thank you for letting 19:43:58

15 the world in." 19:44:00

16 What did she mean by "birthing this"? 19:44:01

17 MS. BREDEHOFT: Objection. Calls for 19:44:04

18 speculation. Hearsay. Foundation. 19:44:06

19 MR. SCHWARTZ: And lacks foundation as to 19:44:07

20 why this witness would know anything, having not 19:44:08

21 even seen the document. 19:44:11

22 A Short answer, Mr. Chew: I don't know. 19:44:12

1 Q What conversations, if any, did you have 19:44:23
2 with Ms. Heard after December 13th, 2018, but 19:44:25
3 before the publication on December 18th, 2018? 19:44:34

4 A I just can't -- two and however many 19:44:39
5 months -- two years and however many months later, 19:44:45
6 tell you, within that time frame, how many 19:44:49
7 discussions I had with her. I don't know. 19:44:53

8 Q Well, if you look down the page, there's 19:44:55
9 an e-mail, did you send this e-mail to Sean Walsh, 19:44:58
10 copied to Amber and others, with the directive, 19:45:06
11 "Go with this"? 19:45:12

12 A Yes, I did. 19:45:13

13 Q Did the text of the op-ed change any time 19:45:15
14 between December 12th, 2018, at 4:08 PST, and the 19:45:20
15 ultimate publication on December 18th? 19:45:28

16 A So there was one e-mail that I was Sean 19:45:33
17 this morning which dealt with a suggestion that 19:45:36
18 the -- a suggested edit that the Post had wanted 19:45:39
19 to make, so you have to help me out on what the 19:45:44
20 timing of that one was, because that may well have 19:45:49
21 been a change that is responsive to your question. 19:45:53

22 But other than that, I don't believe I'm 19:45:55

1 aware of any. I'm not aware of any other changes. 19:45:58

2 MR. CHEW: All right. Let's look at 19:46:07

3 Exhibit 5. 19:46:09

4 (Whereupon, the above-referenced document 19:46:09

5 was marked as Exhibit No. 56.) 19:46:22

6 MR. CHEW: First page, first e-mail. 19:46:22

7 BY MR. CHEW: 19:46:25

8 Q Did you send this e-mail to your client 19:46:25

9 and Mr. Walsh on December 12th, 2018, at about 19:46:28

10 4:00 a.m.? 19:46:36

11 A I did. 19:46:36

12 Q When you say -- what did you mean when you 19:46:37

13 said, "Will the opposing side that we're dealing 19:46:51

14 with." 19:47:01

15 What did that mean? 19:47:01

16 A With Mr. Depp. 19:47:03

17 Q What are you saying here? 19:47:06

18 MR. SCHWARTZ: Objection. Vague. 19:47:10

19 Go ahead. 19:47:11

20 A I'm saying that much of what was in 19:47:12

21 initial drafts probably wouldn't have been used by 19:47:17

22 an opposing party, generically, to claim some 19:47:24

1 violation, but that it was important that she be 19:47:28
2 especially sensitive and careful to that, given 19:47:33
3 who the opposing side was. 19:47:37

4 Q Well, the opposing side had just beaten 19:47:40
5 you with respect to Ms. Heard's arbitration 19:47:45
6 demand, right? 19:47:49

7 MS. BREDEHOFT: Objection. Hearsay. 19:47:50
8 Leading. Foundation. Not best evidence. 19:47:51
9 Mischaracterizes the testimony, and 19:47:54
10 mischaracterizes the evidence. 19:47:57

11 MR. SCHWARTZ: Correct, misstates facts in 19:47:59
12 the record. 19:48:03

13 BY MR. CHEW: 19:48:03

14 Q You may answer. 19:48:03

15 A So the opposing side that had just taken 19:48:04
16 the position that it did not want a judge pro tem 19:48:07
17 sitting as an arbitrator to confidentially resolve 19:48:13
18 the disputes between Ms. Heard and Mr. Depp, 19:48:17
19 raising a bigger issue, but that's what had just 19:48:21
20 occurred. 19:48:25

21 Q Mr. George, we've both been around the 19:48:27
22 block. You took the position in your demand for 19:48:31

1 arbitration that there was an enforceable 19:48:33

2 agreement to arbitrate between Johnny Depp and 19:48:36

3 Amber Heard, correct? 19:48:38

4 A Yes. 19:48:40

5 Q And Judge Meisinger disagreed with you, 19:48:40

6 correct? 19:48:46

7 A Not really. 19:48:46

8 Q Okay. All right. 19:48:48

9 A Do you want to know why? 19:48:49

10 Q Look, you've already authenticated -- 19:48:50

11 actually, I'm not interested. I've seen the 19:48:54

12 judgment which you authenticated. I know how to 19:48:57

13 read. 19:49:00

14 You write here, at the bottom of your 19:49:01

15 e-mail, "Thoughts???" 19:49:10

16 Was there any response by Ms. Heard? 19:49:17

17 A I can't recollect as I sit here today. 19:49:20

18 You would have to show me one that would refresh 19:49:23

19 my recollection. But as I sit here today, I don't 19:49:26

20 have an independent recollection of a response to 19:49:31

21 that. 19:49:32

22 Q So when you filed the motion to dismiss or 19:49:32

1 to transfer venue, you thought that Ms. Heard was 19:49:37
2 taking a righteous position, correct? 19:49:40

3 MS. BREDEHOFT: Objection. Hold on a 19:49:44
4 second. I'm going to object to that on the basis 19:49:45
5 of hearsay, foundation, speculation. And I'm not 19:49:52
6 sure that I completely understand your question, 19:50:03
7 Ben, but I do think that you are also trying to 19:50:06
8 seek attorney-client communications that are 19:50:09
9 outside the scope of the drafting and publication 19:50:12
10 of the op-ed; and, therefore, on that basis, I 19:50:15
11 would object and invoke the privilege to the 19:50:20
12 extent it is outside, and the same with the work 19:50:22
13 product document. 19:50:25

14 MR. SCHWARTZ: I think this comes in the 19:50:26
15 attorney work product protection. I'll object on 19:50:29
16 that basis. I don't think it calls for 19:50:31
17 communications, but either way, I'll instruct the 19:50:34
18 witness not to answer. 19:50:38

19 BY MR. CHEW: 19:50:41

20 Q Are you going to follow that instruction? 19:50:41

21 A I'm going to follow the instruction. 19:50:43

22 MR. CHEW: All right. Why don't we take a 19:50:45

1 five-minute break, so I can go through my notes. 19:50:47

2 THE WITNESS: Sure. 19:50:50

3 THE VIDEOGRAPHER: We are off the record 19:50:51

4 at 7:50. 19:50:54

5 (Whereupon, the court reporter noted the 19:50:54

6 witness's time as 4:50 p.m. Pacific.) 19:51:30

7 (A recess was taken.) 19:51:30

8 THE VIDEOGRAPHER: We are back on the 20:04:30

9 record at 8:04. 20:04:37

10 (Whereupon, the court reporter noted the 20:04:37

11 witness's time as 5:04 p.m. Pacific.) 20:04:37

12 (Whereupon, the above-referenced document 20:04:37

13 was marked as Exhibit No. 57.) 20:04:40

14 BY MR. CHEW: 20:04:40

15 Q So Mr. George, I just have a few more 20:04:41

16 questions this time around. If you could look 20:04:44

17 again at our Exhibit 9, last page. 20:04:47

18 A That's going to be on the screen. 20:05:01

19 Q Yes, it will. Alex will put it on the 20:05:05

20 screen. It's our Exhibit 9, if we can go to the 20:05:09

21 last page. 20:05:10

22 A Got it. 20:05:10

1 Q I'm not going to ask you about your quote, 20:05:11

2 we've already done that. But at the bottom -- 20:05:14

3 MR. CHEW: No, no, no. 20:05:14

4 (Speaking to technician.) 20:05:14

5 Q -- there's a reference, "Heard's attorney, 20:05:16

6 Roberta Kaplan, urged the court last fall to throw 20:05:20

7 out the suit, arguing that the column was not 20:05:25

8 about Heard's allegations against Depp, but, in 20:05:28

9 March, a Virginia judge refused to dismiss the 20:05:31

10 lawsuit." 20:05:34

11 Roberta Kaplan was your immediate counsel 20:05:36

12 before she was then, in turn, replaced by 20:05:44

13 Ms. Bredehoft, correct? 20:05:45

14 MR. CHEW: I'm going to object to hearsay, 20:05:46

15 foundation, speculation. 20:05:48

16 And, then, go ahead. 20:05:48

17 A That's my understanding. 20:05:50

18 Q And is that statement correct, that Chief 20:05:52

19 Judge Weitz, in fact, denied Ms. Heard's motion to 20:05:57

20 dismiss? 20:06:00

21 MS. BREDEHOFT: Objection, hearsay, 20:06:02

22 foundation, not best evidence. 20:06:04

1	Go ahead.	20:06:07
2	A I just don't know. I assume, because of	20:06:08
3	the fact that we're all here, but I don't have any	20:06:12
4	specific knowledge.	20:06:15
5	Q Have you ever read Chief Judge White's	20:06:17
6	letter opinion, opining that at least three	20:06:22
7	statements at issue were of and concerning	20:06:23
8	Johnny Depp and, therefore, potentially	20:06:26
9	defamatory?	20:06:30
10	MS. BREDEHOFT: Objection. Hearsay.	20:06:32
11	Foundation. Calls for speculation.	20:06:32
12	Go ahead.	20:06:34
13	MR. SCHWARTZ: Misstates facts in the	20:06:35
14	evidence as well.	20:06:38
15	MR. CHEW: No, it doesn't.	20:06:40
16	THE WITNESS: I was going to say, maybe	20:06:44
17	there's a trial issue concerning those issues, but	20:06:46
18	I do believe, Mr. Chew, that I was forwarded a	20:06:50
19	copy of that opinion. If I didn't read it	20:06:56
20	thoroughly, I, at least, glanced at it.	20:06:59
21	Q And so you would agree with me that the	20:07:01
22	Court found that these were, in fact, potentially	20:07:05

1 meritorious claims, correct? 20:07:09

2 MS. BREDEHOFT: Objection. Hearsay. 20:07:11

3 Foundation. Speculation. Not best evidence. 20:07:13

4 MR. SCHWARTZ: And mischaracterizes the 20:07:17

5 evidence. 20:07:17

6 A Mr. Chew, I should only say that I do 20:07:21

7 understand that an order was issued denying the 20:07:23

8 motion to dismiss; but beyond that, I really 20:07:26

9 shouldn't comment on it because I just don't know 20:07:30

10 the particulars of what occurred at that point in 20:07:32

11 time. 20:07:32

12 Q All right. Mr. George, I just want to -- 20:07:32

13 this is just for purposes of making the record. 20:07:40

14 Did Ms. Heard, either directly or through 20:07:44

15 you, engage Paul Berese to be a private 20:07:47

16 investigator in the Depp v Heard matter? 20:07:53

17 MS. BREDEHOFT: Objection to the extent 20:07:56

18 that this calls for any attorney-client 20:07:59

19 communications outside the scope of the drafting 20:08:01

20 and publication of the op-ed or outside the scope 20:08:02

21 of -- or with work product outside the scope of 20:08:06

22 the drafting and publication of the op-ed, I would 20:08:10

1 impose the -- I would invoke the privilege and the 20:08:15
2 doctrine. 20:08:19

3 MR. SCHWARTZ: And I will also object on 20:08:19
4 the basis of the attorney work product protection, 20:08:20
5 and instruct the witness not to answer. 20:08:22

6 MR. CHEW: Okay. Just two more. 20:08:24

7 BY MR. CHEW: 20:08:24

8 Q Were you, or some attorney at your law 20:08:29
9 firm, the person who engaged Mr. Berese, or was it 20:08:31
10 someone else? 20:08:35

11 MS. BREDEHOFT: Objection to the extent it 20:08:35
12 calls for work product outside the scope of the 20:08:37
13 drafting and publication of the op-ed, I would 20:08:41
14 invoke the work product privilege. And to the 20:08:44
15 extent that it would involve or implicate 20:08:48
16 attorney-client communications, because I guess 20:08:53
17 that's a possibility in that one, outside the 20:08:56
18 scope of the op-ed, I will impose that. 20:08:59

19 MR. SCHWARTZ: I'll object on the basis of 20:09:01
20 attorney work product protection, and instruct the 20:09:04
21 witness not to answer. 20:09:05

22 BY MR. CHEW: 20:09:06

1 Q Was Ms. Heard the one who directly engaged 20:09:07
2 Mr. Berese to serve as a private investigator in 20:09:11
3 matters relating to Depp versus Heard? 20:09:14

4 MS. BREDEHOFT: Objection. I believe that 20:09:16
5 one definitely calls for attorney-client 20:09:19
6 communications outside the scope of the -- it 20:09:20
7 calls for an answer to that involving either 20:09:23
8 attorney-client communications outside the scope 20:09:28
9 of the op-ed, the drafting and publication of the 20:09:29
10 op-ed, or work product also outside that scope of 20:09:33
11 the op-ed. So I would invoke the privilege and 20:09:38
12 the document. 20:09:41

13 MR. SCHWARTZ: And I will object on the 20:09:41
14 basis of the attorney work product protection, and 20:09:42
15 instruct the witness not to answer. 20:09:45
16 BY MR. CHEW: 20:09:47

17 Q At the time of the op-ed representation 20:09:47
18 that you were trying to carve out, what, if any, 20:09:50
19 conversations did you have with James Franco or 20:09:53
20 James Franco's lawyer? 20:09:58

21 MS. BREDEHOFT: I'm going to object to the 20:10:01
22 extent that it calls for any work product outside 20:10:03

1 the scope of the drafting and publication of the 20:10:08
2 op-ed, and then I would invoke that, if that 20:10:14
3 applies, to the extent it does. 20:10:19

4 MR. SCHWARTZ: I don't think the question 20:10:21
5 calls for that, so I'm not instructing the witness 20:10:23
6 not to answer. 20:10:25

7 MS. BREDEHOFT: Okay. That's fine. I 20:10:26
8 just didn't know. 20:10:28

9 A I don't believe I had any such 20:10:30
10 communications at that time. 20:10:31

11 Q How about later, after the op-ed was 20:10:32
12 published, did you have any communications with 20:10:35
13 James Franco or his lawyer or one of his lawyers? 20:10:37

14 MS. BREDEHOFT: I'm going to object to the 20:10:42
15 extent it calls for work product outside the scope 20:10:44
16 of the op-ed drafting and publication 20:10:47
17 representation. 20:10:50

18 MR. SCHWARTZ: I'll object on the basis of 20:10:50
19 the attorney work product protection, and instruct 20:10:52
20 the witness not to answer on that basis. 20:10:55

21 MR. CHEW: Just two more. 20:10:57

22 BY MR. CHEW: 20:10:59

1 Q What, if any, communications -- strike 20:10:59
2 that. 20:10:59

3 Did you, or anyone on your legal team have 20:11:01
4 any communications with Elon Musk, or any counsel 20:11:04
5 for Elon Musk, prior to the publication of op-ed 20:11:12
6 on December 18th, 2018? 20:11:18

7 MS. BREDEHOFT: To the extent that that 20:11:19
8 calls for work product outside the scope of the 20:11:21
9 representation of the drafting and publication of 20:11:23
10 the op-ed, I would impose that doctrine. 20:11:27

11 MR. SCHWARTZ: And I'll also object on the 20:11:30
12 basis of the attorney work product protection 20:11:31
13 because the question is open-ended as to before 20:11:33
14 the publication of the op-ed and not merely 20:11:35
15 construed to the time period of the retention for 20:11:39
16 purposes of advising on drafting of the op-ed, and 20:11:42
17 I'll instruct the witness not to answer anything 20:11:45
18 outside the time period. 20:11:46

19 BY MR. CHEW: 20:11:48

20 Q Okay. What about during retention of the 20:11:48
21 op-ed, the artificial construct you're trying to 20:11:50
22 impose on everyone. During the time of this -- 20:11:54

1 actually how many engagement letters did you have 20:12:00

2 with Ms. Heard? 20:12:03

3 MS. BREDEHOFT: Well, objection, that 20:12:05

4 calls for attorney-client communications, and I'm 20:12:06

5 going to instruct -- I'm going to impose the 20:12:08

6 attorney-client privilege. 20:12:11

7 BY MR. CHEW: 20:12:13

8 Q Did you have a separate engagement 20:12:13

9 relating to the review of the op-ed and 20:12:16

10 representing her in the defamation lawsuit that 20:12:18

11 arose, despite your advice? 20:12:23

12 MS. BREDEHOFT: I'm going to object. That 20:12:25

13 calls for attorney-client communication outside 20:12:27

14 the scope of the representation of the op-ed 20:12:29

15 drafting and publication advice, and also, 20:12:32

16 potentially, work product as outside the scope. 20:12:34

17 MR. CHEW: Well, you're arguing these are 20:12:38

18 different things, and those are different 20:12:40

19 engagements. They would be reflected by different 20:12:43

20 engagement agreements. Just ask Mr. Bloom about 20:12:46

21 that. 20:12:49

22 MS. BREDEHOFT: Ben, I don't think 20:12:49

1 representation agreements are discoverable. 20:12:51

2 BY MR. CHEW: 20:12:51

3 Q All right. Let me ask you then: During 20:12:54

4 the scope of this rarified animal during the 20:12:56

5 review period, did you have any communications 20:13:02

6 with Elon Musk or any of Mr. Musk's counsel? 20:13:05

7 MR. SCHWARTZ: Objection, vague as to the 20:13:13

8 time period, but I think we understand. 20:13:14

9 MS. BREDEHOFT: Yeah, you said something 20:13:17

10 strange there, but assuming that you're asking in 20:13:20

11 context of the scope of the representation of the 20:13:22

12 drafting and publication of the op-ed, I object. 20:13:24

13 MR. CHEW: I don't have to keep repeating. 20:13:31

14 You know what I meant. 20:13:32

15 THE WITNESS: To the best of my 20:13:34

16 recollection, no. 20:13:35

17 BY MR. CHEW: 20:13:35

18 Q After the period of your making 20:13:36

19 recommendations, giving advice about the op-ed, 20:13:40

20 did you have any communications with Elon Musk or 20:13:44

21 any of Mr. Musk's counsel? 20:13:47

22 MS. BREDEHOFT: Objection. That calls for 20:13:49

1 attorney-client -- or work product outside the 20:13:51
2 scope of the representation for the drafting and 20:13:56
3 publication of the op-ed, so I would impose the 20:14:00
4 work product on that basis. 20:14:02

5 MR. SCHWARTZ: And I will object on the 20:14:05
6 basis of the attorney work product protection, and 20:14:06
7 instruct the witness not to answer on that basis. 20:14:10

8 MR. CHEW: All right. Well, you know we 20:14:13
9 disagree with your position, and we will bring 20:14:16
10 that to the Court, but with that large caveat, 20:14:18
11 we'll keep the deposition open. 20:14:22

12 But thank you, Mr. George, for your time. 20:14:24

13 THE WITNESS: Thank you everybody. 20:14:28

14 MS. BREDEHOFT: Okay. I've got some 20:14:31
15 redirect. I know you won't be shocked. So let me 20:14:33
16 see if I can move through quickly. 20:14:37

17 EXAMINATION 20:14:37

18 BY MS. ELAINE CHARLSON BREDEHOFT: 20:14:37

19 Q Mr. George, you were asked by counsel for 20:14:42
20 Mr. Depp for the basis of your believing that 20:14:44
21 Mr. Depp was highly litigious. Were you aware, at 20:14:48
22 the time of the representation for the op-ed, that 20:14:53

1 Mr. Depp had filed a claim in the UK against the 20:14:55
2 Sun Newspapers and Dan Wootton? 20:15:01

3 MR. CHEW: Objection, vague and ambiguous, 20:15:04
4 assumes facts not in evidence. 20:15:07

5 A I did become aware of that, yes. 20:15:12

6 MS. BREDEHOFT: Okay. I'm going to -- 20:15:16
7 Alex, can you bring up Exhibit 41, please. 20:15:17

8 (Whereupon, the above-referenced document 20:15:30
9 was marked as Exhibit No. 41.) 20:15:41

10 BY MS. BREDEHOFT: 20:15:41

11 Q Mr. George, I'm going to ask you -- 20:15:41

12 MS. BREDEHOFT: Alex, if I can take 20:15:45
13 control. Thank you. 20:15:46

14 Q I'm going to ask you to take a look at 20:15:47
15 what has been marked as Exhibit No. 41, and this 20:15:50
16 is the "Particulars of Claim," "In The High Court 20:15:53
17 of Justice, Queen's Bench Division," and it's 20:15:56
18 John Christopher Depp, II, against New Group 20:16:00
19 Newspapers, Limited, also known as the Sun 20:16:05
20 Newspapers, and Dan Wootton. And it's called, 20:16:07
21 "Particulars of Claim." 20:16:10
22 Have you seen this document; do you 20:16:11

1 recognize the document? 20:16:13

2 A I've seen this document, I believe. 20:16:14

3 And by the way, Mr. Schwartz handed me a 20:16:21

4 copy of the exhibit as a paper copy, and that's 20:16:24

5 the one I'm reading from. 20:16:28

6 Q Okay. Thank you. 20:16:41

7 I'm going to ask you to just take a look 20:16:42

8 through it for me. 20:16:45

9 MR. CHEW: May I ask how on earth this 20:16:46

10 relates to what you believe to be the limited 20:16:49

11 scope of this deposition, which relates to 20:16:51

12 Mr. George's review of the op-ed in December of 20:16:56

13 2018, or is this just a frolic and a detour? 20:17:00

14 MS. BREDEHOFT: It's not a frolic and a 20:17:07

15 detour. You asked him very specifically about 20:17:10

16 Mr. Depp being highly litigious. You also then 20:17:12

17 asked him about whether any suits that he had 20:17:16

18 brought that were highly litigious had been 20:17:19

19 meritorious, and that opens the door completely 20:17:23

20 for this. 20:17:24

21 MR. CHEW: Oh, great. Okay. I'm going to 20:17:25

22 enjoy this transcript, Elaine. 20:17:26

1 BY MS. BREDEHOFT: 20:17:29

2 Q Okay. So Mr. George, was it your 20:17:29

3 understanding that this lawsuit against Sun 20:17:31

4 newspaper and Mr. Wootton related to allegations 20:17:40

5 of Mr. Depp being a wife beater and having engaged 20:17:44

6 in domestic violence against Amber Heard? 20:17:50

7 MR. CHEW: Objection. Leading. 20:17:53

8 Argumentative. Assumes facts not evidence. Way 20:17:55

9 beyond what you have argued is supposed to be the 20:17:58

10 scope of this deposition. 20:18:02

11 MS. BREDEHOFT: Let me -- I'll rephrase 20:18:04

12 it. 20:18:06

13 BY MS. BREDEHOFT: 20:18:06

14 Q What if any -- I'm going to ask you to 20:18:07

15 look at page 6, if you will, and, specifically, 20:18:10

16 paragraph 7, what, if anything, was your 20:18:15

17 understanding relating to whether Mr. Depp had 20:18:19

18 sued for claims that -- claiming that it was false 20:18:24

19 that he had committed domestic violence against 20:18:29

20 Amber Heard. 20:18:34

21 MR. CHEW: Objection. Lack of foundation, 20:18:35

22 assumes facts not evidence, argumentative. This 20:18:36

1 witness had nothing to do with the English case at 20:18:40

2 all. 20:18:45

3 MR. SCHWARTZ: And also -- I want to be 20:18:45

4 clear here: Is your question, Ms. Bredehoft, 20:18:47

5 asking a particular connection with the drafting 20:18:52

6 of the op-ed? Because there are other ways this 20:18:56

7 witness may learned this information that may not 20:18:59

8 be within the scope of the waiver. 20:19:02

9 MR. CHEW: Yeah, Mr. Schwartz, I don't 20:19:04

10 expect it, necessarily, from my learned opposing 20:19:06

11 counsel, but I would expect a little bit of 20:19:08

12 consistency from you, if only for purposes of 20:19:11

13 opposing our forthcoming motion to compel, but if 20:19:14

14 you're going to let her get away with this, 20:19:15

15 then -- 20:19:18

16 MR. SCHWARTZ: I'm asking what her 20:19:18

17 question is about. I would object to the extent 20:19:20

18 it broadens the waiver. 20:19:22

19 MR. CHEW: You already did. 20:19:24

20 BY MS. BREDEHOFT: 20:19:24

21 Q And I'm not asking for any communications 20:19:28

22 between you and Amber in connection with this, I'm 20:19:31

1 asking whether you were aware when you said that 20:19:33
2 you -- that Mr. Depp, you considered him to be 20:19:38
3 highly litigious, whether you were aware of this 20:19:43
4 lawsuit having been filed in the UK by Mr. Depp? 20:19:47
5 MR. CHEW: Objection. Lack of foundation. 20:19:51
6 Assumes facts not in evidence. Argumentative. 20:19:52
7 Beyond what you say -- well beyond what you say 20:19:56
8 the scope of this deposition was. But we're way 20:19:58
9 beyond that now. 20:20:02
10 A Well, I can answer that with a "yes," or 20:20:02
11 "no," and say, which I did a few moments ago, 20:20:05
12 "Yes." 20:20:05
13 Q Okay. And what, if any, understanding did 20:20:12
14 you have prior to your representation of Amber 20:20:14
15 Heard in the review of -- the review and 20:20:21
16 publication of her op-ed, and not in connection 20:20:24
17 with any communications with Ms. Heard, as to why 20:20:28
18 Mr. Depp was suing Newsgroup Newspapers, Limited 20:20:33
19 and Dan Wootton? 20:20:37
20 MR. CHEW: Objection. Leading. Lack of 20:20:39
21 foundation. Hearsay. Assumes facts not in 20:20:43
22 evidence. 20:20:46

1	MR. SCHWARTZ: Yeah, Ms. Bredehoft, I'll	20:20:46
2	object on the basis of the attorney work product	20:20:49
3	protection, because I don't think this question,	20:20:52
4	as posed, is confined to things that Mr. George,	20:20:54
5	would have learned solely in connection with the	20:20:57
6	drafting of the op-ed.	20:20:59
7	MS. BREDEHOFT: All right. That's fair.	20:21:01
8	I'm not intending to ask that, but if that's a	20:21:02
9	concern, I'll withdraw that question.	20:21:05
10	Alex, can you bring up No. 42, please.	20:21:08
11	(Whereupon, the above-referenced document	20:21:11
12	was marked as Exhibit No. 42.)	20:21:27
13	BY MS. BREDEHOFT:	20:21:27
14	Q Mr. George, I'm going to ask you to look	20:21:27
15	at what has been marked as Exhibit No. 42.	20:21:29
16	Do you recognize this document?	20:21:36
17	MR. CHEW: Objection, lack of foundation.	20:21:39
18	Hearsay. Assumes facts not in evidence. We're	20:21:42
19	now well over two years past what you say is the	20:21:47
20	scope, the temporal scope, of this deposition is.	20:21:53
21	A Well, I'm sorry Ms. Bredehoft, do you mind	20:22:04
22	repeating your question, or having the court	20:22:08

1 reporter doing so. 20:22:11

2 Q I asked if you recognize the document 20:22:12

3 that's been marked Exhibit No. 42. 20:22:14

4 MR. CHEW: Objection. lack of foundation. 20:22:16

5 Hearsay. Assumes facts not evidence. Beyond the 20:22:18

6 scope of Mr. -- the witness's representation of 20:22:21

7 Ms. Heard. 20:22:31

8 A I've only read about it in the press. I 20:22:32

9 don't believe I've seen the document before. 20:22:36

10 Q Okay. Well, were you aware that the UK 20:22:38

11 court came down in favor of the Sun and 20:22:41

12 Mr. Wootton and found that Mr. Depp had committed 20:22:48

13 at least 12 acts of domestic violence against 20:22:52

14 Amber Heard? 20:22:56

15 MR. CHEW: Objection. Argumentative. 20:22:57

16 Hearsay. Assumes facts not in evidence. Lack of 20:22:59

17 foundation. Well beyond the scope of the 20:23:06

18 deposition. 20:23:10

19 A Again, I read about this in the press, 20:23:13

20 and, yes, I took away, generally, what you said. 20:23:16

21 I couldn't pinpoint a number of specific findings 20:23:21

22 as you just did, but, generally, that was my 20:23:27

1 understanding. 20:23:29

2 Q And, in fact, Mr. Chew was asking you 20:23:30

3 earlier whether these claims that Mr. Depp had 20:23:33

4 brought were meritorious. 20:23:38

5 Would you agree this is not? 20:23:40

6 MR. CHEW: Objection. Leading. 20:23:42

7 Argumentative. Assumes facts not in evidence. 20:23:43

8 Hearsay. We'll find out what the facts are, you 20:23:46

9 know, in the trial. 20:23:49

10 MR. SCHWARTZ: And I'll object on the 20:23:50

11 basis that it calls for an expert opinion. 20:23:51

12 MS. BREDEHOFT: I will rephrase it. 20:23:55

13 BY MS. BREDEHOFT: 20:23:56

14 Q In the context of Mr. Depp being highly 20:23:57

15 litigious and the questions you were asked about 20:24:03

16 other suits that he brought, what, if any, 20:24:06

17 characterization would you have for this decision 20:24:10

18 on whether it was meritorious or not meritorious? 20:24:12

19 MR. CHEW: Objection. Hearsay. 20:24:18

20 Argumentive. Leading. Assumes facts in evidence. 20:24:19

21 Calls for expert testimony. I find it really 20:24:22

22 interesting how there's a complete double standard 20:24:26

1 from Mr. Schwartz here, but that probably helps 20:24:30
2 us. 20:24:34

3 MR. SCHWARTZ: I agree with you, Mr. Chew, 20:24:34
4 this calls for expert testimony and I would have 20:24:36
5 made the same objection, if you hadn't. 20:24:39

6 A Okay. So -- 20:24:44

7 MR. CHEW: Well, let's keep litigating 20:24:46
8 England, Elaine, please. 20:24:51

9 THE WITNESS: I'm sorry. Everyone is 20:24:56
10 waiting on me and I didn't know that. 20:24:58

11 MR. CHEW: How are we doing on 20:25:00
12 Ms. Bredehoft's time? 20:25:02

13 THE VIDEOGRAPHER: Hold on. 20:25:22

14 MR. CHEW: Over? Good. Okay. 20:25:26

15 THE VIDEOGRAPHER: No, I said, "hold on." 20:25:28

16 MR. CHEW: I thought you said "over." 20:25:31

17 THE VIDEOGRAPHER: Yeah, I would say we're 20:25:33
18 definitely near 3:30. 20:25:36

19 MS. BREDEHOFT: How close are we? Because 20:25:40
20 I'm pretty sure I was better than that. I think 20:25:42
21 you might have misunderstood on an earlier start. 20:25:43
22 I'm pretty sure I'm in good shape here. 20:25:47

Transcript of Eric George

April 5, 2021

300

1	MR. CHEW: No, no. You're not the official	20:25:48
2	timekeeper.	20:25:51
3	MS. BREDEHOFT: Kim, can you go look at	20:25:52
4	that real carefully, please, and give us the time.	20:25:55
5	MR. CHEW: Let's not badger the	20:25:56
6	timekeeper, please.	20:25:59
7	MS. BREDEHOFT: I'm not badgering Kim.	20:26:00
8	MR. CHEW: Yeah, you are.	20:26:02
9	THE VIDEOGRAPHER: Yeah, we're at 3:38.	20:26:15
10	MR. CHEW: All right. Thank you,	20:26:18
11	Mr. George. We appreciate it.	20:26:20
12	MS. BREDEHOFT: I can ask this -- Rick and	20:26:21
13	Mr. George, I have the ability, according to the	20:26:23
14	California courts, to ask you if you would --	20:26:25
15	actually, no, I can go anyway because you didn't	20:26:28
16	use your full 3:30.	20:26:31
17	MR. CHEW: I did. I absolutely did.	20:26:33
18	Ms. Johnson told me I was done for 3:30, and I	20:26:36
19	stopped.	20:26:41
20	MS. BREDEHOFT: Is that correct? I don't	20:26:41
21	believe so.	20:26:44
22	THE VIDEOGRAPHER: Wait, wait. I'm sorry.	20:26:44

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1 You started at 4:16. I think I added the hour 20:26:48
2 that you did. Yeah, I'm sorry. That was totally 20:26:52
3 incorrect. 20:26:56

4 MR. CHEW: We corrected that and we timed 20:26:57
5 it out, and I was done for three and a half hours 20:27:00
6 and so was Ms. Bredehoft. 20:27:04

7 MS. BREDEHOFT: And, Mr. Schwartz, I'm 20:27:06
8 going to ask if you would agree to allow me 20 20:27:08
9 more minutes to finish up. You can allow more 20:27:11
10 than seven hours, and I would ask that -- I think 20:27:14
11 there's a misunderstanding here on the times, but 20:27:16
12 I think it's really important for me to bring out 20:27:19
13 a few more things in this deposition. 20:27:21

14 MR. CHEW: Then you should have stuck with 20:27:24
15 the scope of the deposition. You can't have two 20:27:26
16 rules for two different -- we know this witness is 20:27:29
17 favoring your client, but the same rules apply to 20:27:31
18 both. 20:27:35

19 MS. BREDEHOFT: We can get permission from 20:27:36
20 the witness to go longer, and I'm asking for that. 20:27:38
21 I think there's a mistake. I don't think I've 20:27:41
22 taken 3:30, but I -- 20:27:43

1 THE VIDEOGRAPHER: She hasn't. You have 20:27:45
2 at least 10 minutes left. 20:27:47
3 MS. BREDEHOFT: Okay. Thank you. Let me 20:27:49
4 see if I can do it in 10, and then we don't even 20:27:52
5 have a problem. 20:27:54
6 Let's take this one down, and, Alex, can 20:27:56
7 you bring up 43, please. 20:27:58
8 (Whereupon, the above-referenced document 20:28:00
9 was marked as Exhibit No. 43.) 20:28:06
10 BY MS. BREDEHOFT: 20:28:06
11 Q And while we're bringing that up, 20:28:07
12 Mr. George, what, if anything, have you learned 20:28:09
13 about whether Mr. Depp's appeals in the United 20:28:11
14 Kingdom have expired and are completed? 20:28:16
15 MR. SCHWARTZ: Objection on the basis of 20:28:18
16 -- first of all, lack of personal knowledge, lack 20:28:19
17 of -- you're calling for an expert opinion. 20:28:21
18 Mr. George doesn't have any foundation -- 20:28:22
19 MS. BREDEHOFT: I'll withdraw. 20:28:25
20 MR. CHEW: I want to object, too. 20:28:25
21 Objection on the basis of hearsay, lack of 20:28:26
22 foundation -- 20:28:30

1 MS. BREDEHOFT: I'm withdrawing the 20:28:31
2 question. 20:28:32

3 MR. CHEW: -- argumentative, leading -- 20:28:32

4 MS. BREDEHOFT: I'm withdrawing the 20:28:33
5 question. 20:28:35

6 MR. CHEW: -- beyond the time period, 20:28:35
7 beyond the scope. 20:28:40

8 BY MS. BREDEHOFT: 20:28:40

9 Q Mr. George, you testified, in response to 20:28:40
10 Mr. Depp's counsel's questions that you were aware 20:28:43
11 of and considered federal protections in all 20:28:47
12 states when you were providing the advice to Amber 20:28:49
13 Heard in connection with the drafting and 20:28:53
14 publication of the op-ed. 20:28:54

15 What did you mean by "federal 20:28:56
16 protections"? 20:28:58

17 MR. CHEW: Objection. Mischaracterizes 20:28:58
18 the testimony. It's also leading a favorable 20:29:00
19 witness. Argumentative. Assumes facts not in 20:29:05
20 evidence. 20:29:08

21 A Sure. The Supreme Court a while back 20:29:08
22 constitutionalized the issue of defamation 20:29:14

1 imposing a constitutional requirement that affects 20:29:19
2 defamation laws in every state, thereby, providing 20:29:20
3 a defense to me or other defendants in a 20:29:25
4 defamation context to engage in certain types of 20:29:28
5 free speech. That's what I meant. 20:29:32

6 Q Thank you. I'm going to ask you to take a 20:29:34
7 look -- you were asked about time constraints, and 20:29:37
8 then you were asked about whether the timing of 20:29:47
9 the op-ed was, in any way, connected with Aquaman. 20:29:50
10 I'm going to ask -- 20:29:56

11 MS. BREDEHOFT: Alex, can you bring up our 20:29:56
12 Exhibit 6, please. 20:30:00

13 THE WITNESS: While that's happening, I 20:30:05
14 just want everyone to know I'm texting my wife 20:30:08
15 here, so please don't think this has anything to 20:30:10
16 do with our case. 20:30:13

17 MS. BREDEHOFT: And, Alex, if you can go 20:30:16
18 to Bates stamp 161817, and then if I can take 20:30:18
19 control for a moment, please. 20:30:39

20 BY MS. BREDEHOFT: 20:30:39

21 Q Mr. George, I'm going to ask you to take a 20:30:39
22 look, we're on Exhibit 6, at page 16817, and this 20:30:41

1 is an e-mail from Gerry Johnson. You testified 20:30:47
2 about this string earlier today. And if I could 20:30:51
3 just direct your attention to -- it says, "...and 20:30:53
4 how people can take action. It can be timed for 20:30:56
5 sometime after 11/14, when it's time to remind the 20:31:00
6 newly elected Congress of their priorities. Her 20:31:05
7 ambassador title could appear in her byline and 20:31:08
8 announced in the social media promotion of the 20:31:13
9 piece." 20:31:17

10 What, if anything, was said about the 20:31:19
11 timing of releasing this relating to Aquaman? 20:31:21

12 MR. SCHWARTZ: Objection. Lack of 20:31:24
13 foundation. 20:31:26

14 MR. CHEW: Objection. Lacks foundation. 20:31:26
15 Asked and answered. Leading. 20:31:28

16 A Yeah, as I testified, there was nothing 20:31:31
17 that was said, to me, about what the -- any time 20:31:35
18 constraints were, whether it was about Aquaman, 20:31:42
19 any other film, or about this. 20:31:45

20 Q Okay. Thank you. 20:31:48

21 MS. BREDEHOFT: You can take that down, 20:31:49
22 Alex. 20:31:49

1 Q Mr. George, what, if any, opinions did you 20:31:52
2 have respecting whether the language in the final 20:31:56
3 op-ed left Ms. Heard open for a potential lawsuit? 20:31:59

4 MR. CHEW: Objection. Calls for expert 20:32:05
5 opinion and a waiver of the attorney-client 20:32:10
6 privilege. 20:32:14

7 A I believed that there could be no 20:32:14
8 meritorious suit brought against her after having 20:32:17
9 carefully gone through the wording of the 20:32:20
10 particular drafts, whether that lawsuit would be a 20:32:26
11 defamation or other tort, or for breach of the 20:32:31
12 contract claim. 20:32:35

13 Q Thank you. What, if any, legal advice did 20:32:36
14 you provide to Amber Heard in connection with the 20:32:39
15 drafting and publication of the op-ed that was not 20:32:42
16 made in good faith by you? 20:32:46

17 MR. CHEW: Objection, leading, assumes 20:32:49
18 facts not in evidence, and argumentative. 20:32:55

19 A I acted in good faith throughout and to 20:32:58
20 the best of my abilities. 20:33:01

21 Q Thank you. I have just one more line 20:33:03
22 here. 20:33:02

1	MS. BREDEHOFT: Alex, if you can bring up	20:33:02
2	Exhibit No. 45, please.	20:33:08
3	(Whereupon, the above-referenced document	20:33:10
4	was marked as Exhibit No. 45.)	20:33:17
5	MR. CHEW: Ms. Johnson, how are we on	20:33:17
6	time?	20:33:19
7	THE VIDEOGRAPHER: I'm sorry, you guys	20:33:20
8	caught me off guard. I wasn't keeping track of	20:33:25
9	individual times, but yeah, it's definitely there.	20:33:29
10	MR. CHEW: Okay. We're done then.	20:33:32
11	MS. BREDEHOFT: No, no. Rick will you let	20:33:35
12	me ask questions on this? Because this is my last	20:33:37
13	set of questions.	20:33:40
14	MR. SCHWARTZ: I don't know that we want	20:33:41
15	to be in the middle of this. I'd rather you guys	20:33:43
16	come to an agreement.	20:33:44
17	MS. BREDEHOFT: You know, Kim, I'm going	20:33:44
18	to ask you -- I am sure I am not at 3:30. I'm	20:33:46
19	positive I'm not at 3:30.	20:33:50
20	MR. CHEW: This is outrageous. You	20:33:50
21	continue to badger --	20:33:51
22	MS. BREDEHOFT: It's not outrageous. I	20:33:51

1 have been caught off guard because of a mistaken 20:33:55
2 calculation. But this is very important, Ben, 20:33:59
3 because, Ben, you asked me for this. And I'm 20:33:59
4 just putting the document -- 20:34:01
5 MR. CHEW: I asked you to provide it. We 20:34:01
6 are certainly -- 20:34:03
7 MS. BREDEHOFT: I didn't. I'm providing 20:34:04
8 it right now. 20:34:06
9 MR. CHEW: You said you never opened your 20:34:07
10 computer during a deposition, after you agreed to 20:34:08
11 provide it to me during a break. This is all on 20:34:10
12 the record, Elaine, and that's your problem. 20:34:13
13 Things are on the record and they come back to 20:34:14
14 bite you. 20:34:17
15 MS. BREDEHOFT: It's not open -- you 20:34:19
16 misstated that. But in any event, I'm going to 20:34:20
17 ask you -- 20:34:22
18 MR. CHEW: Ms. Johnson, are we done, or 20:34:23
19 are we done? 20:34:25
20 MS. BREDEHOFT: Please stop talking so we 20:34:25
21 can get this done. 20:34:28
22 MR. CHEW: Ms. Johnson, are we done on 20:34:28

1	time?	20:34:31
2	BY MS. BREDEHOFT:	20:34:31
3	Q Mr. George, I'm going to ask you to take a	20:34:32
4	look at what is marked as Exhibit No. 45, and it's	20:34:34
5	e-mails from Robert Gilmore to Mr. Schwartz,	20:34:38
6	Mr. Roche, and it has copies to Ms. Vasquez and	20:34:43
7	Mr. Chew. [Indiscernible] --	20:34:48
8	MR. CHEW: [Indiscernible.] Get it right,	20:34:48
9	Elaine. Get it right.	20:34:49
10	BY MS. BREDEHOFT:	20:34:50
11	Q So if we go down, I'm going to direct your	20:34:51
12	attention very specifically to the, "Privilege	20:34:54
13	assertion concerning communications with third	20:34:57
14	parties: You indicated the defendant was willing	20:35:00
15	to produce communications involving her, her	20:35:03
16	lawyers, and outside parties, despite a colorable	20:35:05
17	claim of privilege over such communications, if	20:35:09
18	plaintiff agreed that the fact of such production	20:35:12
19	did not constitute a subject-matter waiver over	20:35:14
20	all over privileged communications. Plaintiff is	20:35:18
21	willing to agree to that non-waiver agreement,	20:35:20
22	provided that defendant does not cherry-pick the	20:35:24

1 communications she would be producing, but, 20:35:27
2 instead, will be producing all such communications 20:35:30
3 responsive to Plaintiff's discovery requests." 20:35:33

4 Mr. George, what, if any, documents did 20:35:36
5 you not produce in connection with your 20:35:39
6 communications with Amber Heard relating to your 20:35:42
7 advice to her on the drafting and publication of 20:35:44
8 the op-ed? 20:35:47

9 MR. CHEW: Objection. Leading. 20:35:48
10 Argumentative. Way out of time, which I guess the 20:35:50
11 rules only apply to Mr. Depp and not to Ms. Heard 20:35:54
12 -- which will help us when we move to compel. 20:35:58

13 And how is this within the scope of what 20:36:07
14 you say the scope of the deposition is? 20:36:10

15 THE TECHNICIAN: If I may, this is Alex 20:36:20
16 the tech speaking, I do apologize for 20:36:22
17 interjecting. I've actually been keeping track of 20:36:25
18 time as well, and Ms. Bredehoft, by my 20:36:28
19 calculations, you have over 30 minutes remaining. 20:36:31

20 THE VIDEOGRAPHER: You're right. I did 20:36:34
21 it, too. I told you I was totally caught off 20:36:34
22 guard and I added up wrong. I added him into it. 20:36:35

1	So yeah, you're right, Alex.	20:36:39
2	MS. BREDEHOFT: Thank you, Alex, and thank	20:36:41
3	you, Kim.	20:36:43
4	THE WITNESS: Okay. I would just ask, at	20:36:44
5	this point, that all counsel indulge me, because,	20:36:46
6	my error, but I did think we would be done sooner	20:36:48
7	than this, and I do have to take off soon. But	20:36:53
8	that said -- and if I understand the question	20:36:56
9	that's pending, my answer is, that: We produced	20:36:58
10	all responsive documents.	20:37:01
11	MS. BREDEHOFT: Thank you. I have no	20:37:04
12	further questions. Thank you very much.	20:37:05
13	Mr. Schwartz, you have the ability for	20:37:08
14	Mr. George, to read this deposition and look at it	20:37:12
15	and note any type of typographic errors and any	20:37:17
16	other errors and fill out an errata sheet, and he	20:37:23
17	would have 30 days doing it after receiving the	20:37:26
18	deposition, or he can waive signature. But we	20:37:29
19	need to put it on the record, in Virginia, for	20:37:29
20	that.	20:37:32
21	THE WITNESS: If you don't mind, I'm just	20:37:32
22	going to thank you, Ms. Bredehoft and Mr. Chew,	20:37:34

1 and take off. 20:37:36

2 MS. BREDEHOFT: Mr. George, thank you very 20:37:38

3 much. 20:37:40

4 MR. SCHWARTZ: I'll just say on the record 20:37:40

5 we would like a copy and the opportunity to review 20:37:42

6 it. 20:37:45

7 THE VIDEOGRAPHER: We are off the record 20:37:45

8 at 8:37. 20:37:47

9 (Whereupon, the court reporter noted the 20:37:47

10 witness's time as 5:37 p.m. Pacific.) 20:37:49

11 MS. BREDEHOFT: Thank you very much, 20:37:49

12 Mr. Schwartz, and please tell Mr. George thank you 20:37:49

13 again. 20:37:53

14 (Whereupon, an off-the-record discussion 20:37:53

15 occurred with the videographer.) 20:37:53

16 THE COURT REPORTER: Ms. Bredehoft, would 20:37:53

17 you like to order? 20:38:19

18 MS. BREDEHOFT: We have a standing order. 20:38:19

19 So just go ahead and follow that. 20:38:21

20 (Concluded at 8:38 p.m.)

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ACKNOWLEDGMENT OF DEPONENT

I, ERIC GEORGE, do hereby acknowledge that I have read and examined the foregoing testimony and the same is a true, correct, and complete transcription of the testimony given by me and any corrections appear on the attached errata sheet signed by me.

(SIGNATURE)

(DATE)

1 CERTIFICATE OF SHORTHAND REPORTER-NOTARY PUBLIC

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

14 IN WITNESS WHEREOF, I have hereunto set my hand
15 and affixed my notarial seal this 7th day of
16 April, 2021.

17
18 

19 DEBORAH J. PEARCE, Notary Public
20 State of Maryland
21 My commission expires 8-19-2023
22 Commonwealth of Virginia
My commission expires 8-31-2023

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Transcript of Eric George

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