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# Transcript of Jury Trial - Day 5

Date: April 18, 2022  
Case: Depp, II -v- Heard

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WORLDWIDE COURT REPORTING & LITIGATION TECHNOLOGY

Transcript of Jury Trial - Day 5  
Conducted on April 18, 2022

1 (1167 to 1170)

1167	1169
<p>1 VIRGINIA: 2 IN THE CIRCUIT COURT OF FAIRFAX COUNTY 3 -----x 4 JOHN C. DEPP, II, : 5 Plaintiff and : 6 Counterclaim Defendant, : 7 v. : Civil Action No.: 8 AMBER LAURA HEARD, : CL-2019-0002911 9 Defendant and : 10 Counterclaim Plaintiff. : 11 -----x 12 HEARING 13 BEFORE THE HONORABLE PENNEY AZCARATE 14 Fairfax, Virginia 15 Monday, April 18, 2022 16 10:00 a.m. EDT 17 18 19 Job No.: 443885 20 Pages: 1167 - 1478 21 Reported by: Judith E. Bellinger, RPR, CRR 22</p>	<p>1 A P P E A R A N C E S 2 3 ON BEHALF OF THE PLAINTIFF AND COUNTERCLAIM 4 DEFENDANT: 5 BENJAMIN G. CHEW, ESQUIRE 6 BROWN RUDNICK LLP 7 601 Thirteenth Street NW 8 Suite 600 9 Washington, D.C. 20005 10 202.536.1700 11 12 SAMUEL A. MONIZ, ESQUIRE 13 CAMILLE M. VASQUEZ, ESQUIRE 14 BROWN RUDNICK LLP 15 2211 Michelson Drive 16 7th Floor 17 Irvine, CA 92712 18 949.440.0234 19 20 21 22</p>
1168	1170
<p>1 Held at: 2 3 4 CIRCUIT COURT OF FAIRFAX COUNTY 5 4110 Chain Bridge Road 6 Courtroom 5J 7 Fairfax, Virginia 22030 8 703.691.7320 9 10 11 12 13 14 15 16 17 18 19 20 21 22</p>	<p>1 A P P E A R A N C E S C O N T I N U E D 2 3 JESSICA N. MEYERS, ESQUIRE 4 BROWN RUDNICK LLP 5 7 Times Square 6 New York, NY 7 212.209.4938 8 9 REBECCA MACDOWELL LECARAZ, ESQUIRE 10 BROWN RUDNICK LLP 11 One Financial Center 12 Boston, MA 02111 13 617.856.8149 14 15 16 17 18 19 20 21 22</p>

Transcript of Jury Trial - Day 5  
 Conducted on April 18, 2022

2 (1171 to 1174)

1171	1173
<p>1 APPEARANCES CONTINUED</p> <p>2</p> <p>3 ON BEHALF OF THE DEFENDANT AND COUNTERCLAIM</p> <p>4 PLAINTIFF:</p> <p>5</p> <p>6 ELAINE CHARLSON BREDEHOFT, ESQUIRE</p> <p>7 ADAM S. NADELHAFT, ESQUIRE</p> <p>8 DAVID E. MURPHY, ESQUIRE</p> <p>9 CHARLSON BREDEHOFT COHEN BROWN &amp;</p> <p>10 NADELHAFT, P.C.</p> <p>11 11260 Roger Bacon Drive</p> <p>12 Suite 201</p> <p>13 Reston, VA 20190</p> <p>14 703.318.6800</p> <p>15</p> <p>16 J. BENJAMIN ROTTENBORN, ESQUIRE</p> <p>17 WOODS ROGERS PLC</p> <p>18 10 South Jefferson Street</p> <p>19 Suite 1400</p> <p>20 P.O. Box 14125</p> <p>21 Roanoke, VA 24011</p> <p>22 540.983.7540</p>	<p>1 EXHIBITS</p> <p>2 Offered Admitted</p> <p>3 Plaintiff's</p> <p>4 41 1179 1182</p> <p>5 47 1179 1182</p> <p>6 48 1179 1182</p> <p>7 49 1179 1182</p> <p>8 65 1453 1454</p> <p>9 146 1451 1451</p> <p>10</p> <p>11 Defendant's</p> <p>12 283 1179 1182</p> <p>13 304 1179 1182</p> <p>14 307 1179 1182</p> <p>15 395 1179 1182</p> <p>16 405 1179 1182</p> <p>17 414 1179 1182</p> <p>18 455 1179 1182</p> <p>19 1063 1179 1182</p> <p>20 1067 1235 1239 (with redactions)</p> <p>21</p> <p>22</p>
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<p>1 CONTENTS</p> <p>2 EXAMINATION OF DAVID KIPPER, M.D. (CONTINUING) PAGE</p> <p>3 By Mr. Nadelhaft 1182</p> <p>4 By Ms. Meyers 1190</p> <p>5 By Mr. Nadelhaft 1229</p> <p>6 By Ms. Meyers 1232</p> <p>7</p> <p>8 EXAMINATION OF DEBRA LLOYD, APRN PAGE</p> <p>9 By Mr. Nadelhaft 1250</p> <p>10 By Ms. Meyers 1318</p> <p>11 By Ms. Meyers 1422</p> <p>12</p> <p>13 EXAMINATION OF JOSHUA SEAN BETT PAGE</p> <p>14 By Ms. Vasquez 1423</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>	<p>1 PROCEEDINGS</p> <p>2</p> <p>3 THE BAILIFF: All rise. Please be</p> <p>4 seated and come to order.</p> <p>5 THE COURT: All right. Good morning.</p> <p>6 MS. BREDEHOFT: Good morning, Your</p> <p>7 Honor.</p> <p>8 THE COURT: Any preliminary matters</p> <p>9 before the jury comes in?</p> <p>10 MS. BREDEHOFT: Yes, Your Honor. We</p> <p>11 have a couple of quick ones.</p> <p>12 THE COURT: If you could, put your</p> <p>13 microphone on.</p> <p>14 MS. BREDEHOFT: I think we're going to</p> <p>15 approach.</p> <p>16 THE COURT: Oh, you're going to</p> <p>17 approach with it? Okay. That's fine. Are these</p> <p>18 the exhibits that are owed?</p> <p>19 MS. LECARAZ: We've made some progress,</p> <p>20 Your Honor, but we do still have two text messages</p> <p>21 that we think appropriately come in for context</p> <p>22 around that...</p>

1175	1 THE COURT: Which exhibit are we 2 looking at? 3 MS. LECAROZ: Plaintiff's 548. 4 THE COURT: Plaintiff's 548. Okay. 5 MS. LECAROZ: The one put in with 6 Baruch. 7 THE COURT: Got it. And you wanted 8 those for context? 9 MS. LECAROZ: Yeah. I think we're down 10 to these two that Ms. Bredehoff thinks don't 11 appropriately come in for context. I understand 12 they're not immediately preceding in time. 13 MS. BREDEHOFT: They're different days. 14 MS. LECAROZ: Right. But I think, you 15 know, text message communications often span a few 16 days. 17 THE COURT: It was a very previous text 18 message? 19 MS. LECAROZ: The one right before and 20 right after, yes. 21 MS. BREDEHOFT: But they're days apart. 22 THE COURT: I understand the days.	1177	1 THE COURT: Uh-huh. 2 MS. BREDEHOFT: -- who are claiming 3 damages way beyond November, and they said they 4 don't have to. They're just going to have them 5 testify. I can move to strike based on the claim, 6 but I'd rather they just amended their 7 designations so that we can prepare. 8 THE COURT: I think we should do that, 9 actually. 10 MS. LECAROZ: I think we're in a 11 position to do that, Your Honor. 12 THE COURT: Okay. Sounds like they're 13 in a position to do that. 14 MS. BREDEHOFT: Could you do that by 15 tomorrow? 16 MS. LECAROZ: I think that that should 17 work, yeah. 18 THE COURT: I'm glad I was here for 19 this. Thank you. 20 All right. Anything else preliminary? 21 MR. CHEW: No. Thank you, Your Honor. 22 THE COURT: Okay. We're good? We're
1176	1 That is the text conversation; that there are no 2 texts in between. 3 MS. LECAROZ: Yes. 4 THE COURT: Okay. All right. Then 5 I'll allow that. 6 Is that coming into evidence then? 7 MS. LECAROZ: I think Ms. Bredehoff 8 asked that we -- there's one that's a duplicate on 9 the next communication, so I'm just going to take 10 that one out. 11 THE COURT: Okay. 12 MS. LECAROZ: And then I can get it to 13 you by lunch. 14 THE COURT: Okay. 15 MS. BREDEHOFT: And then there's one 16 other issue, Your Honor, and this stems from last 17 Friday. The plaintiff said that they're going to 18 just claim damages up to November 2nd, 2020. 19 THE COURT: Right. 20 MS. BREDEHOFT: Well, I asked them over 21 the weekend to amend their expert designations; 22 they have two experts --	1178	1 ready for the jury? All right. Let's bring the 2 jury out. 3 MR. NADELHAFT: Your Honor, sorry. 4 THE COURT: Oh, sorry. 5 MR. NADELHAFT: So Dr. Kipper is going 6 to be -- 7 THE COURT: Oh, yes. Dr. Kipper is the 8 last hour. 9 MR. NADELHAFT: We have some agreements 10 we've had agreements for both him and Lloyd, and I 11 don't know if you wanted us to tell them to you 12 now because they're going to be played -- we're 13 agreeing that the ones we have agreements on can 14 be shown while being -- 15 THE COURT: Do you want to wait for the 16 jury and you can enter those into evidence? Is 17 that okay? You enter those into evidence when the 18 jury comes out? That sound all right? 19 MR. NADELHAFT: That's fine for me. 20 THE COURT: That works? Okay. 21 (Whereupon, the jury entered the 22 courtroom and the following proceedings took

1179	1 place.) 2 THE COURT: All right. Good morning, 3 ladies and gentlemen. 4 All right. Mr. Nadelhaft, did you 5 have -- as you might remember, we're in the middle 6 of Dr. Kipper's testimony for deposition, but I 7 think there are some exhibits that need to be 8 moved in. 9 MR. NADELHAFT: Thank you, Your Honor, 10 the parties discussed over the weekend, and we 11 have agreement as to Plaintiff's Exhibits 41, 42, 12 47, 48, and 49 of plaintiff's exhibits. I do 13 believe that there are some slight redactions I 14 think they have copies of that they can provide to 15 you. 16 And then we also have Defendant's 1063, 17 which is redacted and I can provide you a copy, 18 and they also have the redactions. 19 THE COURT: Okay. 20 MR. NADELHAFT: Same for 21 Defendant's 283, Defendant's 405, Defendant's 455, 22 Defendant's 304, Defendant's 307, and, in	1181	1 MR. NADELHAFT: Sorry. Plaintiff's 42, 2 we agreed after discussion that there would be no 3 redactions. 4 MS. MEYERS: That's correct. 5 THE COURT: All right. So all those 6 are entered into evidence with the redactions that 7 you've agreed upon? 8 MR. NADELHAFT: Yes, Your Honor. 9 THE COURT: There's no objection? 10 MS. MEYERS: Yes, there's no objection. 11 I think -- did you address ours? 12 MR. NADELHAFT: I think I addressed 13 yours. 14 So they have the electronic copies 15 which are going to be shown while the deposition 16 is being played. 17 THE COURT: Right. 18 MR. NADELHAFT: And I can provide you 19 copies now of the redacted ones. 20 THE COURT: Right. If they're redacted 21 ones, I need copies. If they're not redacted, I 22 have them.
1180	1 addition, 395 and 414 would come in without any 2 redactions. 3 But I can provide you copies of the 4 ones that we -- 5 THE COURT: And have you already done 6 redactions? Or are you still working on 7 redactions? 8 MS. MEYERS: Your Honor, we have agreed 9 on the redactions except for one document which we 10 will address. 11 THE COURT: Okay. And now, 42, I 12 already have in evidence. I was just waiting for 13 redactions for that one. So we're still waiting 14 for redactions for that one, correct? Or do you 15 have that for me? 16 MR. NADELHAFT: 42, I believe 17 defendant's. 18 THE COURT: Defendant's 42. 19 MR. NADELHAFT: Oh, I think we decided 20 there were -- we agreed that there would be no 21 redactions. 22 THE COURT: Plaintiff's 42?	1182	1 MR. NADELHAFT: Right. 2 THE COURT: So, yes. That will be 3 fine, all right. 4 MR. NADELHAFT: Thank you, Your Honor. 5 THE COURT: Thank you. 6 All right. I think we're ready. 7 MS. MEYERS: Thank you. 8 If I may, just before we begin, Your 9 Honor. 10 THE COURT: Okay. 11 MS. MEYERS: Just as an explanation for 12 the jury, what you have seen from Dr. Kipper up 13 until this point has been Ms. Heard's counsel 14 examining him. At some point it will switch over, 15 and it will be Mr. Depp's counsel examining him. 16 THE COURT: Okay. Thank you. 17 EXAMINATION BY COUNSEL FOR THE DEFENDANT AND 18 COUNTERCLAIM PLAINTIFF 19 Q -- Mr. Depp informing you that he was 20 upset with Dr. Cowan? 21 A Yes. I remember clearly that he was 22 upset with Dr. Cowan at a certain point.

<p>1183</p> <p>1 Q Do you recall this text message from 2 Mr. Depp that I just read to you? 3 <b>A Yes. In reading it, I do.</b> 4 Q Okay. And then Mr. Depp wrote to you 5 again on July 5th, 2015, and said "You're a great 6 man and a great friend. As much as I would love 7 to see you... It would waste your time... I've 8 just got quite a lot going on with business stuff, 9 my Keith film, and some Amber issues... By the 10 way, I'll try not to be too subtle about this... 11 Cowan should be stripped of his license to 12 practice his supposed profession... And then he 13 should be stripped and spray painted whilst 14 handcuffed to a stop sign!!! He's at best a 15 fraudulent, irresponsible turd of monumental 16 proportions!!! I love you. Johnny." 17 Do you recall this text message from 18 Mr. Depp? 19 <b>A Again, I do upon reading this. I don't</b> 20 <b>remember all the specific messages I got from him,</b> 21 <b>but I certainly remember the gestalt of his</b> 22 <b>feelings.</b></p>	<p>1185</p> <p>1 Q Okay. Now, I want to go to another 2 text message. 3 On August 3rd, 2015, Mr. Depp texts 4 you, "You can flog me soon for waiting until now 5 for having not to properly given my kind apparatus 6 the appropriate and adequate general cock love... 7 I've tried and mostly failed... Many, many 8 unpleasant things happening with my business world 9 going on that are attempting to give me the funny 10 pain face that can render me no more and send me 11 head first straight into the bowl of minestrone or 12 worse, a green curry... So most necessary PRNs 13 are all headaches meds, Xanax, Adderall, and 14 whatever this magical ointment for that traitorous 15 redness in the much valued and region of 16 significance... Thanks and love. X. JD." 17 Do you recall this text message? 18 <b>A No. But I'm once again reminded by</b> 19 <b>looking at it.</b> 20 Q Do you recall not being paid for three 21 months? 22 <b>A I recall not being paid. I don't</b></p>
<p>1184</p> <p>1 Q Okay. And do you continue to work with 2 Dr. Cowan? Do you continue to refer patients to 3 Dr. Cowan? Let me ask it differently. 4 <b>A Yes. I have great respect for</b> 5 <b>Dr. Cowan.</b> 6 MR. CHEW: And Mr. Depp sent you 7 another text message on July 24th, 2015, that 8 says, "Hey dear pal, Amber is happy happy with 9 Cowan... I just don't know what truth he gets and 10 I don't know what his manners and strengths are.. 11 I think she listens to him because when we argue 12 she slathers me up in the most condescending 13 psychiatric trophy lines like... Your fear is so 14 visible... What are you scared of...!!! Why are 15 you letting your fear and ego control your life, 16 etcetera... Hippy shit... Makes me want to 17 rampage against ANYONE wearing Birkenstocks!!! 18 Love you large. J." 19 I assume you recall this text message 20 as well. 21 <b>A No. But I recall when I'm looking at</b> 22 <b>it, yes.</b></p>	<p>1186</p> <p>1 <b>remember how long, and it always turned back</b> 2 <b>around. But specifically that issue, no, I can't</b> 3 <b>give you specifics.</b> 4 Q So there was a period of time where 5 Mr. Depp was not paying you for your services, 6 correct? 7 <b>A Correct.</b> 8 Q Okay. So as of February 10th, 2016, 9 you were very concerned about Mr. Depp's health, 10 correct? 11 <b>A In the document I'm also serving as his</b> 12 <b>internist, managing some medical issues, and</b> 13 <b>that's the nature of these concerns.</b> 14 Q You weren't concerned at all about 15 Mr. Depp's continuing with his treatment plan for 16 drug and alcohol use? 17 <b>A You can't separate those two issues.</b> 18 <b>They're not two distinct issues.</b> 19 <b>But in order for me to assess how he</b> 20 <b>was doing in general with his general health,</b> 21 <b>these metrics that I identify in the second</b> 22 <b>paragraph were things I needed to have a follow-up</b></p>

<p>1187</p> <p>1 <b>on. And I wasn't -- I wasn't getting that</b> 2 <b>follow-up, and I needed to know that we were on</b> 3 <b>the right course, medically.</b> 4 Q Do you recall being concerned about 5 Mr. Depp in June 2018? 6 <b>A Yes.</b> 7 Q What, if any, concerns did you have 8 about Mr. Depp taking drugs or alcohol that were 9 not part of the protocol? 10 <b>A I was concerned that that could be</b> 11 <b>potentially an issue.</b> 12 Q Dr. Kipper, Kipper 28 -- 13 MS. MEYERS: Your Honor, at this point 14 there's an exhibit of which the parties are still 15 in dispute. I believe it's okay to continue 16 playing at this point and we can resolve it -- 17 THE COURT: All right. 18 MS. MEYERS: -- after the fact. 19 THE COURT: Is that true? 20 MR. NADELHAFT: Yeah. We can resolve 21 it after the deposition -- or after the testimony. 22 THE COURT: That's fine, thank you.</p>	<p>1189</p> <p>1 Q Dr. Kipper, you've already testified 2 that these are invoices to Mr. Depp, correct? 3 <b>A I've testified that these are invoices.</b> 4 <b>This is something generated from my accountant,</b> 5 <b>yes.</b> 6 Q Have you spoken to Mr. Depp's legal 7 counsel since the beginning of this year? 8 <b>A Yes.</b> 9 Q Who have you spoken to? 10 <b>A I've spoken to Camille on two</b> 11 <b>occasions.</b> 12 Q Anybody else? 13 <b>A No.</b> 14 Q What did you speak to Camille about? 15 <b>A About the deposition.</b> 16 MR. HARWELL: Dr. Kipper, I think 17 you're incorrect. I think also Ms. Meyers was in 18 one of those telephone conversations. 19 THE WITNESS: That's right. 20 Q And other than the scheduling of the 21 deposition, did they talk about the issues that 22 you were going to be asked about?</p>
<p>1188</p> <p>1 MR. NADELHAFT: Thank you, Your Honor. 2 Q -- are invoices that you produced from 3 February 2015 through -- from February 6th, 2015, 4 to February 1st, 2021. 5 Do you recall producing these 6 documents? 7 <b>A No. Those would have come from my</b> 8 <b>accountant's office.</b> 9 Q Okay. Are you still working for 10 Mr. Depp? 11 <b>A Yes.</b> 12 Q Okay. And so, at the bottom here, 13 there's a lot that just say "case management fee." 14 Do you know what that refers to as opposed to 15 nursing services and doctor services? 16 <b>A That's a retainer fee that I have with</b> 17 <b>him on a monthly basis.</b> 18 Q Now, Dr. Kipper, we received invoices 19 for you from Mr. Depp from Fireman's Insurance 20 Fund for 2014. Does this look like an invoice 21 from your office to Mr. Depp? 22 <b>A It does.</b></p>	<p>1190</p> <p>1 <b>A Yes, of course.</b> 2 Q How long were the conversations? 3 <b>A 45 minutes each.</b> 4 Q Were they over phone or by Zoom or in 5 person? 6 <b>A The first conversation was in person,</b> 7 <b>and the second was by Zoom.</b> 8 Q And you thought they were about two 9 45-minute calls? 10 <b>A About that.</b> 11 Q Are you paying for your counsel in this 12 case? 13 <b>A Yes, I am.</b> 14 <b>EXAMINATION BY COUNSEL FOR THE PLAINTIFF AND</b> 15 <b>COUNTERCLAIM DEFENDANT</b> 16 <b>BY MS. MEYERS:</b> 17 Q First of all, Dr. Kipper do you 18 remember seeing this document earlier? 19 <b>A Yes, I do.</b> 20 Q And you recognize it as your initial 21 consultation notes with Mr. Depp? 22 <b>A Yes.</b></p>

<p>1191</p> <p>1 Q I'd like to direct your attention to 2 the third page -- excuse me one moment. Do you 3 see here where it says "Impressions"?</p> <p>4 A Yes.</p> <p>5 Q Now, what -- could you describe what 6 the items listed under this heading are?</p> <p>7 A So the first one, primary dopamine 8 imbalance, this, in general terms, I don't know -- 9 primary dopamine imbalance ADHD, which is 10 attention deficit hyperactivity disorder, 11 bipolar I, depression secondary to above, 12 insomnia, chronic substance abuse disorder, 13 chronic reflux.</p> <p>14 Q With respect to these items, are these 15 an official diagnosis of Mr. Depp?</p> <p>16 A These are my impressions, yes.</p> <p>17 Q When you say "impressions," is that 18 considered a -- would you consider that a 19 diagnosis?</p> <p>20 A Yes, Ms. Meyers, that's my diagnostic 21 impression.</p> <p>22 MS. MEYERS: I would like to pull up</p>	<p>1193</p> <p>1 A Yes, she did.</p> <p>2 Q And how -- and how regular was 3 Ms. Lloyd's contact with Mr. Depp?</p> <p>4 A She had contact with him daily, either 5 physically or by phone.</p> <p>6 Q How often would you estimate that she 7 was physically in contact with him?</p> <p>8 A I would say 80 percent, 90 percent of 9 the time, somewhere in there.</p> <p>10 Q And Mr. Depp agreed to this supervision 11 by Ms. Lloyd?</p> <p>12 A Yes.</p> <p>13 MS. MEYERS: Alex, could we please pull 14 up what's been marked as Kipper Exhibit 6.</p> <p>15 Q Dr. Kipper, could you please confirm 16 that these are your notes from a consultation you 17 had with Mr. Depp in Boston in June of 2014?</p> <p>18 A Yes. This is a summary from June 22nd 19 to June 24th of that consult -- of that time with 20 him.</p> <p>21 Q And then if we scroll down -- I guess I 22 have control here -- does it reflect here that you</p>
<p>1192</p> <p>1 what's already been marked as Kipper Exhibit 4, 2 please.</p> <p>3 Q And, Dr. Kipper, I believe we've 4 already established, but you confirmed that you 5 recognize these documents -- this document?</p> <p>6 A Yes.</p> <p>7 Q And these are also notes of a 8 consultation you had with Mr. Depp?</p> <p>9 A Correct.</p> <p>10 Q And it appears from these notes that 11 Ms. Debbie Lloyd was at the meeting, correct?</p> <p>12 A Yes.</p> <p>13 Q And she's a registered nurse?</p> <p>14 A Yes.</p> <p>15 Q And did Mr. Depp's treatment plan 16 contemplate Ms. Lloyd remaining with Mr. Depp 17 during his therapy?</p> <p>18 A Yes.</p> <p>19 Q And was it contemplated that Ms. Lloyd 20 would personally prescribe his medications to him.</p> <p>21 Did Ms. Lloyd provide personally 22 dispensed medications to Mr. Depp.</p>	<p>1194</p> <p>1 met with Ms. Heard at that time, correct?</p> <p>2 A Yes.</p> <p>3 Q Did Ms. Heard tell you that she was 4 concerned about Mr. Depp being violent with her at 5 this consultation?</p> <p>6 A No.</p> <p>7 Q If she had told you that, is that 8 something you would have documented in these 9 notes.</p> <p>10 A Yes.</p> <p>11 Q Your note here states that "Amber has a 12 strong family history of drug and alcohol abuse 13 and is particularly sensitive to his behaviors and 14 potential for abuse."</p> <p>15 The phrase "potential for abuse," is 16 that referring to substance abuse?</p> <p>17 A Yes.</p> <p>18 Q It's not referring to physical abuse?</p> <p>19 A No.</p> <p>20 Q And what do you mean when you state 21 that Ms. Heard is particularly sensitive to 22 Mr. Depp's behaviors?</p>



<p>1195</p> <p>1 <b>A Having grown up in that environment,</b> 2 <b>she's used to seeing the trauma that it inflicts</b> 3 <b>and is not only able to recognize it, but also it</b> 4 <b>affects her -- she has the ability to understand</b> 5 <b>what that looks like.</b> 6 Q And was this your observation of her or 7 something she told you? 8 <b>A This is something she told me.</b> 9 MS. MEYERS: Alex, could you please 10 pull up what's been marked as Kipper Exhibit 5, 11 please. 12 Q Dr. Kipper, you recognize these as, I 13 believe you testified, a combination of your own 14 patient notes and Ms. Lloyd's patient notes for 15 Mr. Depp, correct? 16 <b>A Yes.</b> 17 Q And I believe you testified you 18 compiled them together; is that right? 19 <b>A Yes.</b> 20 Q Did you -- for the notes that were 21 taken by Ms. Lloyd, did you specifically request 22 that she maintain these notes?</p>	<p>1197</p> <p>1 Q And so do you understand that to be 2 June 30th, 2015? 3 <b>A Yes.</b> 4 Q Did Ms. Lloyd stop attending to 5 Mr. Depp around this time? 6 <b>A I'm going to refer to my timetable just</b> 7 <b>because I'll have a better sense of where the</b> 8 <b>treatment was.</b> 9 Q All right. I'd like to talk to you 10 briefly about the detox process on Mr. Depp's 11 island in August of 2014. I believe you said that 12 you traveled down to attend to Mr. Depp during 13 this time, correct? 14 <b>A Yes.</b> 15 Q And when you arrived on the island, who 16 was present? 17 <b>A Mr. Depp, Ms. Heard, Ms. Lloyd, and</b> 18 <b>assistants for Mr. Depp. But I can't recall which</b> 19 <b>assistants.</b> 20 Q Do you recall how many? 21 <b>A No. There were people that I think</b> 22 <b>lived or serviced that island when he was there.</b></p>
<p>1196</p> <p>1 <b>A Yes. That's part of her</b> 2 <b>responsibility.</b> 3 Q And did you advise her on what types of 4 information she should include in those notes? 5 <b>A No.</b> 6 Q Is there anything in particular that 7 you asked her to include in the notes? 8 <b>A No. She was trained in this, and she</b> 9 <b>knew what the -- what the important metrics were</b> 10 <b>in notation.</b> 11 Q And I believe you testified that you 12 have reviewed these notes in their entirety 13 before, correct? 14 <b>A Yes.</b> 15 Q How many times would you say you've 16 reviewed these notes? 17 <b>A I reviewed them at the time they were</b> 18 <b>written, and I reviewed them probably a couple</b> 19 <b>weeks ago, so twice.</b> 20 Q I'm going to turn to the last page now. 21 And do you see this note marked June 30th? 22 <b>A Yes.</b></p>	<p>1198</p> <p>1 <b>There were probably four of those people. And I'm</b> 2 <b>not sure if he had one or two of his own</b> 3 <b>assistants.</b> 4 Q Dr. Kipper, when you arrived on the 5 island in August 2014, did you see where Mr. Depp 6 was staying during that time? 7 <b>A Yes.</b> 8 Q And what did these accommodations look 9 like? 10 <b>A He had a little home structure. It was</b> 11 <b>a small structure, a bedroom and a kitchen and a</b> 12 <b>sitting area.</b> 13 Q And was Ms. Heard staying there with 14 him? 15 <b>A Yes.</b> 16 Q And relative to where Mr. Depp was 17 staying, where was Ms. Lloyd staying? 18 <b>A She was staying at another part of the</b> 19 <b>island in a structure called a yurt, which is like</b> 20 <b>a tent.</b> 21 Q And how far away -- how long would it 22 take Ms. Lloyd to get to where Mr. Depp was</p>

<p>1199</p> <p>1 staying? 2 <b>A Five minutes.</b> 3 Q Five minutes? 4 <b>A Five minutes.</b> 5 Q Would that be walking? 6 <b>A No. That would be on a motorized</b> 7 <b>vehicle.</b> 8 Q And relative to where Mr. Depp was 9 staying, where did you stay when you were on the 10 island? 11 <b>A I stayed on the other side of that</b> 12 <b>yurt.</b> 13 Q Also a yurt? 14 <b>A Yes.</b> 15 Q Had Mr. Depp's detoxification process 16 already started when you arrived on the island? 17 <b>A Yes.</b> 18 Q And had Ms. Lloyd been overseeing that 19 process? 20 <b>A Yes.</b> 21 Q Did she report any issues to you upon 22 your arrival?</p>	<p>1201</p> <p>1 Q And she was seeing him personally as 2 well? 3 <b>A Yes.</b> 4 Q And you went and saw Mr. Depp after 5 seeing that message, correct? 6 <b>A Yes.</b> 7 Q And did Ms. Lloyd go with you? 8 <b>A Yes.</b> 9 Q And where did you see Mr. Depp after 10 receiving that message? 11 <b>A I believe I saw him outside of his</b> 12 <b>little home. It was either in the – across from</b> 13 <b>his little home was like a little cantina where</b> 14 <b>one would eat, and it was, I think, around the</b> 15 <b>cantina.</b> 16 Q And what was his physical condition at 17 that time? 18 <b>A He was frustrated, he was</b> 19 <b>uncomfortable.</b> 20 Q How was his demeanor? 21 <b>A One of being frustrated and</b> 22 <b>uncomfortable.</b></p>
<p>1200</p> <p>1 <b>A She certainly updated – I was</b> 2 <b>updated – he started on the 10th. I arrived on</b> 3 <b>the 12th, so I was in full communication with her</b> 4 <b>from the beginning of that.</b> 5 Q After you arrived on the island, did 6 you personally oversee Mr. Depp's detoxification 7 process? 8 <b>A Yes.</b> 9 Q And how often would you check in on 10 him? 11 <b>A Several times a day.</b> 12 Q And was this physically going to see 13 him? 14 <b>A No. This would be seeing him</b> 15 <b>physically once a day and then checking on his</b> 16 <b>progress throughout the day.</b> 17 Q So during the detoxification process, 18 you did see Mr. Depp at least once a day? 19 <b>A Yes.</b> 20 Q And then was Ms. Lloyd checking on 21 Mr. Depp daily? 22 <b>A Yes.</b></p>	<p>1202</p> <p>1 Q And was Ms. Heard with him at that 2 time? 3 <b>A When I saw Mr. Depp at that point, no,</b> 4 <b>she was not.</b> 5 Q And at this time, this was in the 6 middle of his detoxification process, correct? 7 <b>A Yes.</b> 8 Q Did you see Ms. Heard that evening? 9 <b>A I can't remember.</b> 10 Q Do you recall Ms. Heard seeking medical 11 attention from you for any physical injuries while 12 you were in the island in August 2014? 13 Go ahead. 14 <b>A No, I don't.</b> 15 Q And if Ms. Heard had sought treatment 16 from you for an injury, is that something you 17 would've documented? 18 <b>A Yes, I would have.</b> 19 Q Is that something you would have 20 remembered her telling you? 21 <b>A Yes.</b> 22 Q Did you see Ms. Heard after this</p>

<p>1 evening of August 8th -- 17th? 2 <b>A On that particular evening, that, I</b> 3 <b>can't remember. But I did see Ms. Heard pretty</b> 4 <b>much daily during the time -- my time on the</b> 5 <b>island.</b> 6 Q So did you see her at some point 7 perhaps -- did you see her the next day? 8 <b>A Yes.</b> 9 Q And did you observe any injuries to 10 Ms. Heard at that time? 11 <b>A No.</b> 12 Q She didn't have any bruises that you 13 observed? 14 <b>A No.</b> 15 Q After you met with Mr. Depp that 16 evening of August 17th, did you go back to his 17 accommodations at some point? 18 <b>A No. No, I think we resolved the issues</b> 19 <b>where we were outside of his little hut, his home.</b> 20 Q So you didn't go and attend to him 21 again in his home at that time? 22 <b>A No.</b></p>	<p>1203</p>	<p>1 in detox? 2 <b>A Yes.</b> 3 Q During the time that you were with 4 Mr. Depp on the island for his detox process, did 5 you ever witness him physically abuse Ms. Heard? 6 <b>A No, never.</b> 7 Q Did you ever see any physical evidence 8 that Mr. Depp had abused Ms. Heard? 9 <b>A No. Same answer, never.</b> 10 Q And during your time on the island, did 11 you witness Ms. Heard abuse Mr. Depp in any way? 12 <b>A No.</b> 13 Q Do you recall when Ms. Heard first 14 became your patient? 15 <b>A No. I couldn't give you a definitive</b> 16 <b>date.</b> 17 Q It would have been before October 2014, 18 though, correct? 19 <b>A Yes.</b> 20 Q And it would have been after Mr. Depp's 21 detox on the island in August of 2014; is that 22 right?</p>	<p>1205</p>
<p>1 MS. MEYERS: Alex, could you please 2 pull up what's been marked as Kipper Exhibit 8. 3 Q Dr. Kipper, I think you -- do you 4 remember this email from earlier in your 5 deposition? 6 <b>A Yes, I do.</b> 7 Q And I believe you testified that you 8 recall sending this email to Ms. Dembrowski on 9 August 18th, 2014, correct? 10 <b>A Yes.</b> 11 Q At the time you wrote this email, how 12 long had you known Mr. Depp? 13 <b>A Approximately four months.</b> 14 Q And in those four months, how much time 15 had you spent with Mr. Depp in person? 16 <b>A I couldn't give you a cumulative number</b> 17 <b>of hours, but I would say -- I would estimate that</b> 18 <b>including up until August 18, I would guesstimate</b> 19 <b>20 hours.</b> 20 Q Is it fair to say that when you wrote 21 this email, most of the time you had known 22 Mr. Depp or spent with Mr. Depp was while he was</p>	<p>1204</p>	<p>1 <b>A That's correct.</b> 2 Q When you started treating Ms. Heard did 3 you assign a nurse to her? 4 When you started treating Ms. Heard was 5 there a nurse that you assigned to her? 6 <b>A I can't recall where it was -- whether,</b> 7 <b>Ms. Meyers, it was when I started to treat her.</b> 8 <b>At some point, I did assign a nurse to her. But I</b> 9 <b>can't tell you which came first. I believe I was</b> 10 <b>treating her before I had recommended a nurse to</b> 11 <b>her.</b> 12 Q So your recollection is that you 13 started treating her, and after that, a nurse was 14 assigned? 15 <b>A That's my memory, yes.</b> 16 Q Do you have a sense of how close in 17 time from you beginning your treatment the nurse 18 was assigned to Ms. Heard? 19 <b>A It couldn't have been too long, but I</b> 20 <b>honestly can't give you a specific reference of</b> 21 <b>time.</b> 22 Q Do you remember that nurse's name?</p>	<p>1206</p>

1207	<p>1 <b>A Erin Boerum.</b></p> <p>2 Q And was Ms. Boerum a registered nurse?</p> <p>3 <b>A Yes.</b></p> <p>4 Q And I believe you covered this earlier:</p> <p>5 Ms. Boerum is a contractor for you?</p> <p>6 <b>A Yes.</b></p> <p>7 Q But she reports to you with respect to</p> <p>8 your patients that she covers?</p> <p>9 <b>A Correct.</b></p> <p>10 Q During this time that Ms. Heard was</p> <p>11 your patient and she had a nurse -- Ms. Boerum was</p> <p>12 assigned to her, how regular was Ms. Boerum</p> <p>13 checking in with Ms. Heard?</p> <p>14 <b>A Very regularly. Very regularly, she</b></p> <p>15 <b>saw her, yes.</b></p> <p>16 Q Was she seeing her on a daily basis?</p> <p>17 <b>A I don't believe it was a daily basis,</b></p> <p>18 <b>but she, I know, had daily contact with her in</b></p> <p>19 <b>some way.</b></p> <p>20 Q Would Ms. Boerum have seen Ms. Heard in</p> <p>21 person on at least a weekly basis?</p> <p>22 <b>A Yes.</b></p>	1209	<p>1 <b>a second to look at this, I can be more specific.</b></p> <p>2 Q Certainly. Let me know if you would</p> <p>3 like me to scroll through the document. If so, I</p> <p>4 can do that for you.</p> <p>5 <b>A Yes, these are notes from Erin Boerum.</b></p> <p>6 Q Does this document reflect any of your</p> <p>7 notes on Ms. Heard?</p> <p>8 <b>A This reflects my treatment</b></p> <p>9 <b>recommendations.</b></p> <p>10 Q But these are Ms. Boerum's notes --</p> <p>11 <b>A Yes.</b></p> <p>12 Q -- you believe?</p> <p>13 <b>A Yes.</b></p> <p>14 Q Did you ask Ms. Boerum to maintain</p> <p>15 these notes?</p> <p>16 <b>A Yes.</b></p> <p>17 Q And for what purpose?</p> <p>18 <b>A Because she was monitoring a patient,</b></p> <p>19 <b>and I needed to be informed of how the patient was</b></p> <p>20 <b>doing and for any adjustments of treatment.</b></p> <p>21 Q Did you tell Ms. Boerum what type of</p> <p>22 information should be documented in her notes?</p>
1208	<p>1 Q Were there times that Ms. Boerum</p> <p>2 traveled with Ms. Heard?</p> <p>3 <b>A Yes.</b></p> <p>4 Q As a registered nurse, does Ms. Boerum</p> <p>5 have an obligation to report any suspected abuse</p> <p>6 of her patient to you?</p> <p>7 MS. MEYERS: Alex, can you please pull</p> <p>8 up document H.</p> <p>9 Alex, is this Kipper Exhibit 34?</p> <p>10 Yes.</p> <p>11 Q Dr. Kipper, do you recognize this</p> <p>12 document?</p> <p>13 <b>A Yes.</b></p> <p>14 Q And what is it?</p> <p>15 <b>A It's an initial intake of that care.</b></p> <p>16 Q I'm going to scroll down a bit and just</p> <p>17 show you that there are future entries on this</p> <p>18 document as well.</p> <p>19 Do you see these?</p> <p>20 <b>A I do. I'm assuming -- I don't want to</b></p> <p>21 <b>make an assumption, but I would believe these</b></p> <p>22 <b>notes are from Erin Boerum. But if you'll give me</b></p>	1210	<p>1 <b>A No.</b></p> <p>2 Q And would there be anything that you</p> <p>3 expressly asked her not to document?</p> <p>4 <b>A No.</b></p> <p>5 Q Do you understand that Ms. Boerum used</p> <p>6 her training and judgment in preparing these</p> <p>7 notes?</p> <p>8 <b>A Yes, I do.</b></p> <p>9 Q You weren't telling her what to include</p> <p>10 in these notes. She was drafting them on her own;</p> <p>11 is that correct?</p> <p>12 <b>A That's correct.</b></p> <p>13 Q Have you reviewed these notes before?</p> <p>14 <b>A I have reviewed these notes.</b></p> <p>15 Q Have you reviewed them in their</p> <p>16 entirety?</p> <p>17 <b>A Yes, but not recently.</b></p> <p>18 Q And how often would you review</p> <p>19 Ms. Boerum's notes on Ms. Heard?</p> <p>20 <b>A I review my nurses' notes as they come</b></p> <p>21 <b>in. So that would be on a real-time basis.</b></p> <p>22 Q And going back to the first page, do</p>

<p style="text-align: right;">1211</p> <p>1 you see this entry is dated August 27th, 2014? 2 <b>A Yes.</b> 3 Q Does this refresh your recollection as 4 to when Ms. Boerum would have been assigned to 5 Ms. Heard? 6 <b>A Yes.</b> 7 Q And does this at all refresh your 8 recollection as to when you started treating 9 Ms. Heard? 10 <b>A Yes. This would – this would be about</b> 11 <b>the time.</b> 12 Q Prior to the time that you treated 13 Ms. Heard, did she ever seek treatment from you 14 for injuries that appeared to be the result of 15 domestic abuse? 16 <b>A No, she did not.</b> 17 Q Did she ever seek treatment from you 18 for any injuries that she told you were caused by 19 Mr. Depp? 20 <b>A No, she did not.</b> 21 Q And did Ms. Heard ever tell you that 22 Mr. Depp abused her?</p>	<p style="text-align: right;">1212</p> <p>1 <b>A No, she did not.</b> 2 Q And you never witnessed any physical 3 abuse by Mr. Depp against Ms. Heard during the 4 time that you treated both of them? 5 <b>A No, never.</b> 6 Q If Ms. Boerum observed that Ms. Heard 7 had any physical injuries, is this something that 8 would have been documented in her patient notes 9 for Ms. Heard? 10 <b>A Yes, absolutely.</b> 11 Q In March 2015, you traveled down to 12 Australia to attend to Mr. Depp; is that right? 13 <b>A Yes.</b> 14 Q And at the time, Mr. Depp was already 15 in Australia, correct? 16 <b>A Correct.</b> 17 Q And was Ms. Lloyd with him? 18 <b>A Yes.</b> 19 Q And was Ms. Heard with him? 20 <b>A Yes.</b> 21 Q When you arrived in Australia, when did 22 you first see Mr. Depp?</p>	<p style="text-align: right;">1213</p> <p>1 <b>A I believe it was the day after I</b> 2 <b>arrived.</b> 3 Q And where did you see him? 4 <b>A I saw him at his home in Australia.</b> 5 Q And how long did you spend with him 6 during that time? 7 <b>A Probably an hour.</b> 8 Q When you first met with Mr. Depp in 9 Australia, did you see the home that he was 10 staying in? 11 <b>A Yes.</b> 12 Q And was it a standalone house? 13 <b>A Yes.</b> 14 Q Was there a fence around the house? 15 <b>A I'm sorry?</b> 16 Q Was there a fence around the house? 17 <b>A That, I can't recall.</b> 18 Q Do you recall whether Mr. Depp's 19 security team was at the property? 20 <b>A Yes, they were.</b> 21 Q Where did you see them? 22 <b>A I saw them in and around the house.</b></p>	<p style="text-align: right;">1214</p> <p>1 Q Do you recall how many security 2 personnel there were? 3 <b>A Two to three.</b> 4 Q Now, after you arrived in Australia, at 5 some point you were notified that Mr. Depp had 6 been injured, correct? 7 <b>A Yes.</b> 8 Q And I believe this was covered earlier 9 in your deposition: You were actually -- you 10 actually received a text message from Mr. Depp, 11 correct? 12 <b>A Yes.</b> 13 Q And after you received that message, 14 did you go directly to Mr. Depp? 15 <b>A Yes.</b> 16 Q And Ms. Lloyd came with you? 17 <b>A Yes.</b> 18 Q And I believe you said that Mr. Depp 19 was outside the property in a car at that time, 20 right? 21 <b>A That's correct.</b> 22 Q Was Mr. Depp's security team there with</p>
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1215	1 him? 2 <b>A Yes.</b> 3 Q And you examined Mr. Depp in the car 4 with his security team present? 5 <b>A Yes. I saw him seated in the car when</b> 6 <b>I arrived.</b> 7 Q Did Mr. Depp tell you what had happened 8 to his finger at that time? 9 <b>A Yes.</b> 10 Q How long did you attend to Mr. Depp 11 outside of the house? 12 <b>A Not long. Probably a half hour because</b> 13 <b>I needed to get him to the emergency room.</b> 14 Q So immediately after meeting him at the 15 house, you went with him to the emergency room? 16 <b>A Yes. I cleaned his wound to the best</b> 17 <b>that I could with the supplies that we had and</b> 18 <b>then took him, so it was within a half hour that</b> 19 <b>we left.</b> 20 Q Did you return to the house after 21 bringing Mr. Depp to the hospital? 22 <b>A No. I was taken back to my hotel.</b>	1217	1 <b>area.</b> 2 Q When you went into the house, did you 3 see Ms. Heard? 4 <b>A Yes.</b> 5 Q And how did she appear? 6 <b>A She was certainly upset.</b> 7 Q Did Ms. Heard seek any medical 8 attention from you for any injuries at that time? 9 <b>A No.</b> 10 Q Did Ms. Heard seek any medical 11 attention from Ms. Lloyd at that time? 12 <b>A No.</b> 13 Q Did you observe any physical injuries 14 to Ms. Heard when you saw her that -- on 15 March 7th, 2015? 16 <b>A No.</b> 17 Q So Ms. Heard did not have any 18 observable bruises that you saw? 19 <b>A That's correct.</b> 20 Q And did Ms. Heard appear to have a 21 broken nose? Was Ms. Heard's face swollen at all 22 when you saw her?
1216	1 Q After you attended to Mr. Depp and 2 before you went to the hospital with him, did you 3 go inside the house? 4 <b>A No.</b> 5 Q So you did not go inside the property 6 the day that Mr. Depp contacted you about his 7 injured finger? 8 <b>A No, I did go into the house. As I had</b> 9 <b>stated, that after I saw him, initially, I went</b> 10 <b>into the home to see the home. I had --</b> 11 Q That was before you went to the 12 hospital with him? 13 <b>A Yes. I went in to instruct one of the</b> 14 <b>people with him to look for the tip of the finger,</b> 15 <b>hoping that we would be able to put it back.</b> 16 Q Was the tip of the finger found? 17 <b>A It was found.</b> 18 Q Who found it? 19 <b>A I believe this man was their chef.</b> 20 Q And do you know where he found it or 21 where he told you he found it? 22 <b>A He said he found it in the kitchen</b>	1218	1 <b>A Not that I was aware of, no.</b> 2 Q Did Ms. Heard have any cuts on her arms 3 when you saw her? 4 <b>A Not that I can recall.</b> 5 Q Do you recall seeing any cuts on her 6 feet or any other part of her body? 7 <b>A I can't recall.</b> 8 Q If Ms. Heard had appeared to have been 9 injured, is this something that you would have 10 documented? 11 <b>A Yes.</b> 12 Q Did you observe any broken glass in the 13 house? 14 <b>A Yes.</b> 15 Q Could you tell what the glass was from? 16 <b>A No.</b> 17 Q Was there blood around the broken 18 glass? 19 <b>A There was blood around the home, as I</b> 20 <b>have previously mentioned, but I didn't</b> 21 <b>specifically see blood on glass.</b> 22 Q Where did you see the broken glass?

1219	<p>1 <b>A In the kitchen area.</b></p> <p>2 Q And that's where the finger -- the top</p> <p>3 part of the finger was found as well?</p> <p>4 <b>A Yes.</b></p> <p>5 MS. MEYERS: Alex, could you please</p> <p>6 bring up what I believe was marked as Kipper</p> <p>7 Exhibit 17.</p> <p>8 Q Dr. Kipper, you recognize this document</p> <p>9 from earlier in the deposition?</p> <p>10 <b>A Yes.</b></p> <p>11 Q It's a letter dated March 15th, 2015,</p> <p>12 from you to Mr. Depp, correct?</p> <p>13 <b>A Correct.</b></p> <p>14 Q And you did send this letter to</p> <p>15 Mr. Depp, correct?</p> <p>16 <b>A Correct.</b></p> <p>17 MS. MEYERS: Alex, could you please</p> <p>18 pull up what I marked as document K and I believe</p> <p>19 will be Kipper Exhibit 35.</p> <p>20 Q Dr. Kipper, do you recognize this</p> <p>21 document?</p> <p>22 <b>A Yes.</b></p>	1221	<p>1 <b>visit, probably the next day, and I also reviewed</b></p> <p>2 <b>this a couple weeks ago.</b></p> <p>3 Q And I would just like to direct your</p> <p>4 attention to the last page.</p> <p>5 Is this your signature here?</p> <p>6 <b>A Yes.</b></p> <p>7 Q And when would you have signed this?</p> <p>8 <b>A That was confirming that I reviewed</b></p> <p>9 <b>Mr. Tinker's notes.</b></p> <p>10 Q Going back to the top, this is a</p> <p>11 patient record for Ms. Heard, correct?</p> <p>12 <b>A Yes.</b></p> <p>13 Q And where it says "date, December 17,</p> <p>14 2015," is that the date of this -- that's the date</p> <p>15 of this document?</p> <p>16 <b>A Yes.</b></p> <p>17 Q And the document states, "phone call</p> <p>18 consultation headache," correct?</p> <p>19 <b>A Yes.</b></p> <p>20 Q So does that mean that on</p> <p>21 December 17th, 2015, Ms. Heard called the offices</p> <p>22 to report a headache?</p>
1220	<p>1 Q What is it?</p> <p>2 <b>A If you could, just for my verification,</b></p> <p>3 <b>can you scroll down to the bottom, please.</b></p> <p>4 Q Sure. It goes on for two pages.</p> <p>5 <b>A Yes, I'm familiar with this document,</b></p> <p>6 <b>yes.</b></p> <p>7 Q Did you prepare this document?</p> <p>8 <b>A No.</b></p> <p>9 Q It was a document that was prepared by</p> <p>10 someone who works for you?</p> <p>11 <b>A This was prepared by Monroe Tinker, who</b></p> <p>12 <b>was a nurse practitioner who worked for me at that</b></p> <p>13 <b>time.</b></p> <p>14 Q Is this a record that's ordinarily</p> <p>15 prepared and maintained in the course of your</p> <p>16 business?</p> <p>17 <b>A Yes.</b></p> <p>18 Q And have you reviewed this document</p> <p>19 before?</p> <p>20 <b>A Yes.</b></p> <p>21 Q When would you have reviewed it?</p> <p>22 <b>A I reviewed it immediately after the</b></p>	1222	<p>1 <b>A Yes.</b></p> <p>2 Q And right below this, there is a</p> <p>3 paragraph that starts out with "HPI."</p> <p>4 What does that stand for?</p> <p>5 <b>A History of present illness.</b></p> <p>6 Q And is the information in this</p> <p>7 paragraph what Ms. Heard reported during her phone</p> <p>8 consultation?</p> <p>9 <b>A That's what was written. I was not</b></p> <p>10 <b>there, but that's what's written.</b></p> <p>11 Q States, "Today the patient reports a</p> <p>12 headache after she bumped her head while standing</p> <p>13 up two days ago," correct?</p> <p>14 <b>A Yes.</b></p> <p>15 Q And a couple sentences below that, it</p> <p>16 says, "Last seen in office on 12/23/2015."</p> <p>17 Is that an error or did she come back</p> <p>18 in a year?</p> <p>19 <b>A No, I think that's got to be an error.</b></p> <p>20 Q So based on this document, it's your</p> <p>21 understanding that Ms. Heard called the office on</p> <p>22 December 17th?</p>

<p>1223</p> <p>1 A Yes.</p> <p>2 Q Scrolling down to the bottom here, it</p> <p>3 says, "Objective data, physical exam." Do you see</p> <p>4 that?</p> <p>5 A Yes.</p> <p>6 Q Does that mean that Ms. Heard came into</p> <p>7 the office for physical examination?</p> <p>8 A That's what it signifies, yes.</p> <p>9 Q And would that have also been on</p> <p>10 December 17th, 2015?</p> <p>11 A Yes. This note reflects that visit.</p> <p>12 Everything in this note reflects that visit.</p> <p>13 Q And so Monroe would have also performed</p> <p>14 that physical examination?</p> <p>15 A Monroe did perform that physical</p> <p>16 examination. I did not see Ms. Heard; Monroe saw</p> <p>17 Ms. Heard.</p> <p>18 Q The information below this heading of</p> <p>19 "physical exam" which goes onto the next page, are</p> <p>20 these the findings from Ms. Heard's physical exam</p> <p>21 on December 17th?</p> <p>22 A Correct.</p>	<p>1225</p> <p>1 Q And I believe you testified you didn't</p> <p>2 see Ms. Heard on December 17th, correct?</p> <p>3 A That's correct.</p> <p>4 Q How were you informed of the medical</p> <p>5 plan?</p> <p>6 A I spoke to Mr. Tinker by telephone.</p> <p>7 Q And would that conversation have</p> <p>8 happened on the 17th as well?</p> <p>9 A Yes.</p> <p>10 MS. MEYERS: Alex, could you please</p> <p>11 pull up document L. And I believe this is what</p> <p>12 will be marked as Kipper Exhibit 36.</p> <p>13 Q Dr. Kipper, do you recognize this</p> <p>14 document?</p> <p>15 A Yes, I recognize it upon looking at it,</p> <p>16 yes.</p> <p>17 Q What do you recognize this document as?</p> <p>18 A As an email from Ms. Heard to me</p> <p>19 requesting medical records for that month of</p> <p>20 December.</p> <p>21 Q December 2015?</p> <p>22 A Yes.</p>
<p>1224</p> <p>1 Q And if Ms. Heard had any physical</p> <p>2 injuries, would those have been noted in this</p> <p>3 portion of the document?</p> <p>4 A Yes.</p> <p>5 Q And there are some medical terms in</p> <p>6 here, so if you could let me know does any of this</p> <p>7 indicate that there were physical injuries that</p> <p>8 were documented?</p> <p>9 A No.</p> <p>10 Q Does this document indicate that a</p> <p>11 concussion check was performed?</p> <p>12 A Yes.</p> <p>13 Q And what were the results of that?</p> <p>14 A Under the assessment and plan as</p> <p>15 written, Mr. Tinker did not indicate concussion</p> <p>16 under his assessment.</p> <p>17 Q Under "Assessment and Plan," item 4</p> <p>18 says that "Dr. Kipper is aware of the medical plan</p> <p>19 and is in agreement."</p> <p>20 That's consistent with your</p> <p>21 recollection?</p> <p>22 A Yes.</p>	<p>1226</p> <p>1 Q And do you recall receiving this email?</p> <p>2 A I don't recall receiving it, but I'm</p> <p>3 sure I did and I'm sure I reviewed it, yes.</p> <p>4 Q And you see that the email is dated</p> <p>5 August 8th, 2016, correct?</p> <p>6 A Yes.</p> <p>7 Q And you have no reason to doubt that</p> <p>8 you received the email on or around that date?</p> <p>9 A Correct.</p> <p>10 Q On August 8th, 2016, was Ms. Heard</p> <p>11 still your patient?</p> <p>12 A I believe so, but I can't be sure.</p> <p>13 Q Now, I'm going to read from this email</p> <p>14 here. Ms. Heard writes to you, "As per our</p> <p>15 conversation earlier, is it possible to get my</p> <p>16 medical records from the month of December,</p> <p>17 please? I know I saw Monroe during one of my</p> <p>18 office visits, if it makes it easier for you to</p> <p>19 find. I'm not sure. Anyway, it was great talking</p> <p>20 to you earlier."</p> <p>21 Ms. Heard references speaking to you</p> <p>22 earlier in this email, correct?</p>



<p style="text-align: right;">1227</p> <p>1     <b>A Yes.</b></p> <p>2     Q Do you recall having spoken to</p> <p>3 Ms. Heard before receiving this email?</p> <p>4     <b>A I can't remember.</b></p> <p>5     Q You don't remember anything about a</p> <p>6 conversation that you might have had with</p> <p>7 Ms. Heard prior to receiving this email?</p> <p>8     <b>A No, I can't recall that.</b></p> <p>9     Q And I believe you already stated this,</p> <p>10 but you understand Ms. Heard to be requesting</p> <p>11 medical records from December 2015, correct?</p> <p>12    <b>A Correct.</b></p> <p>13    Q And Ms. Heard mentions Monroe in this</p> <p>14 email as well, correct?</p> <p>15    <b>A Correct.</b></p> <p>16    Q And Monroe is the nurse practitioner</p> <p>17 that Ms. Heard saw on December 17th, 2015, right?</p> <p>18    <b>A Yes.</b></p> <p>19    Q Did you provide Ms. Heard with her</p> <p>20 medical records for December 2015?</p> <p>21    <b>A I believe so.</b></p> <p>22    Q And do you recall what those records</p>	<p style="text-align: right;">1229</p> <p>1     Q In the six years that you treated -- or</p> <p>2 in the over six years that you've treated</p> <p>3 Mr. Depp, has Mr. Depp ever complained to you that</p> <p>4 Ms. Heard has physically abused him?</p> <p>5     <b>A No, not that I can recall.</b></p> <p>6     Q Have you ever witnessed Ms. Heard be</p> <p>7 physically abusive to Mr. Depp?</p> <p>8     <b>A No.</b></p> <p>9     Q Has anyone who works for you or reports</p> <p>10 to you ever reported to you that they witnessed</p> <p>11 Ms. Depp -- or, excuse me -- Ms. Heard being</p> <p>12 physically abusive to Mr. Depp?</p> <p>13    <b>A No, not that I can recall.</b></p> <p>14    <b>EXAMINATION BY COUNSEL FOR THE DEFENDANT AND</b></p> <p>15    <b>COUNTERCLAIM PLAINTIFF</b></p> <p>16    <b>BY MR. NADELHAFT:</b></p> <p>17    Q You testified earlier in questions from</p> <p>18 Ms. Meyers that the tip of Mr. Depp's finger was</p> <p>19 found in the kitchen, found on the floor of the</p> <p>20 kitchen in the home in Australia, correct?</p> <p>21    <b>A Correct.</b></p> <p>22    Q Now, where -- do you know where the</p>
<p style="text-align: right;">1228</p> <p>1 consisted of?</p> <p>2     <b>A The one we just reviewed.</b></p> <p>3     Q Was that the only one for</p> <p>4 December 2015?</p> <p>5     <b>A Again, I would have to research her</b></p> <p>6 <b>chart for that information, but I know at least it</b></p> <p>7 <b>was that note.</b></p> <p>8     Q Did Ms. Heard ever ask you for any</p> <p>9 other medical records?</p> <p>10    <b>A No.</b></p> <p>11    Q In the over six years that you've known</p> <p>12 Mr. Depp, have you ever witnessed him be</p> <p>13 physically abusive to any person?</p> <p>14    <b>A Never.</b></p> <p>15    Q And you've never witnessed him being</p> <p>16 physically abusive to Ms. Heard, correct?</p> <p>17    <b>A Correct.</b></p> <p>18    Q You've also known Ms. Heard for over</p> <p>19 six years at this point, correct?</p> <p>20    <b>A Yes. Although I have not seen</b></p> <p>21 <b>Ms. Heard for at least a couple years, perhaps</b></p> <p>22 <b>three years.</b></p>	<p style="text-align: right;">1230</p> <p>1 kitchen was? Was it on -- what floor the kitchen</p> <p>2 was?</p> <p>3     <b>A There was a downstairs below the</b></p> <p>4 <b>kitchen area. I think the -- I'm not really sure.</b></p> <p>5 <b>I think those were bedrooms, but I'm not positive.</b></p> <p>6 <b>So this would be on the main floor. The kitchen</b></p> <p>7 <b>was on the main floor as you went into the home.</b></p> <p>8     Q And that's where the tip of the finger</p> <p>9 was found, in the kitchen on the main floor?</p> <p>10    <b>A Yes.</b></p> <p>11    Q Now, there was a text message where you</p> <p>12 got a text message from Mr. Depp?</p> <p>13    <b>A Yes.</b></p> <p>14    Q And he said he cut his finger, correct?</p> <p>15    <b>A I think that's what it said, yes.</b></p> <p>16    Q Okay. And the reference from the</p> <p>17 emergency room said that Mr. Depp had sliced his</p> <p>18 finger with a knife, correct?</p> <p>19    <b>A Yes. That's what he told -- because I</b></p> <p>20 <b>was present for that, that's what he told the</b></p> <p>21 <b>emergency room doctor.</b></p> <p>22    Q Okay. So Mr. Depp told the emergency</p>

<p>1 room doctor that he had cut his finger with a 2 knife, correct? 3 <b>A Yes.</b> 4 Q And you didn't put that in any of your 5 notes that a bottle was thrown at Mr. Depp, 6 correct? 7 <b>A Correct.</b> 8 Q Did Mr. Depp have any cuts anywhere 9 else on his face or anywhere else that would have 10 come from glass? 11 Now, if Ms. Heard told Ms. Boerum that 12 Mr. Depp had hit her in the face several times and 13 sent her pictures of bruises, would you expect 14 Ms. Boerum to report that in her notes? 15 <b>A I would have expected Ms. Boerum to</b> 16 <b>send me those pictures.</b> 17 Q Okay. So you would have expected to 18 see those pictures from Ms. Boerum; is that 19 correct? 20 <b>A Yes.</b> 21 Q And you would have expected -- and you 22 would have wanted Ms. Boerum to -- if she had seen</p>	<p>1231</p> <p>1 <b>A Other than the summary notes, no.</b> 2 Q And was Ms. Lloyd with you when 3 Mr. Depp told you what had happened to his finger 4 before you brought him to the hospital? 5 <b>A I believe yes. I'm not positive, but I</b> 6 <b>believe yes. Because she was helping me at the</b> 7 <b>car to try to clean out that finger, which is when</b> 8 <b>he explained what happened.</b> 9 Q So you believe that Ms. Lloyd would 10 have heard Mr. Depp's explanation? 11 <b>A I believe so.</b> 12 THE COURT: All right. That completes 13 the deposition. And the next witness is also by 14 deposition; is that correct? 15 MR. CHEW: That's correct, Your Honor, 16 Debbie Lloyd. 17 THE COURT: All right. Well, why don't 18 we go ahead and go ahead and take our morning 19 break? It's a little early, but since the next 20 witness is also by deposition, why don't we take 21 our 15-minute break now so you can stretch for a 22 little bit. And we'll come back in about 15</p>
<p>1232</p> <p>1 a text that said, "I was hit in the face by 2 Ms. Heard," and then received pictures of bruises, 3 that Ms. Boerum would report that to you, correct? 4 <b>A Yes.</b> 5 Q Is that an instruction that you gave to 6 your nurses, to report to you any abuse that they 7 saw or were reported to them? 8 <b>A Yes, if they saw that as valid.</b> 9 <b>Ms. Heard, for example, if somebody hurt Ms. Heard</b> 10 <b>while she was under the care of -- direct care of</b> 11 <b>Ms. Boerum, and Ms. Boerum documented that</b> 12 <b>Ms. Heard had been injured, she certainly would</b> 13 <b>have reported that to me.</b> 14 Q That's what your expectation would be, 15 that she would report it? 16 <b>A Yes.</b> 17 <b>EXAMINATION BY COUNSEL FOR THE PLAINTIFF AND</b> 18 <b>COUNTERCLAIM DEFENDANT</b> 19 <b>BY MS. MEYERS:</b> 20 Q Dr. Kipper, did you keep any notes of 21 your treatment of Mr. Depp while he was in 22 Australia?</p>	<p>1233</p> <p>1 minutes, okay? So you can go ahead. Do not talk 2 to anybody. Don't do any outside research, okay? 3 Thank you. 4 (Whereupon, the jury exited the 5 courtroom and the following proceedings took 6 place.) 7 THE COURT: All right. Let's hope this 8 clock is right today, so we'll come back at 11:25, 9 okay? 10 MR. CHEW: Thank you, Your Honor. 11 MS. BREDEHOFT: Thank you, Your Honor. 12 THE COURT: Thank you. 13 (Recess taken from 11:09 a.m. to 14 11:25 a.m.) 15 THE BAILIFF: All rise. Please be 16 seated and come to order. 17 THE COURT: All right. I just want to 18 make sure with those exhibits from the last, that 19 we're going to get them somehow into evidence or 20 the redacted copies. Do we have them now? Or do 21 we need them.. 22 MS. MEYERS: I have a hard copy for</p>

1235	1 Your Honor of our -- a copy before we turned it in 2 THE COURT: Not for the newest 3 deposition, for the one we just had with 4 Dr. Kipper. 5 MS. MEYERS: Yes. I have the exhibits. 6 THE COURT: Okay. 7 MR. NADELHAFT: There's one thing, Your 8 Honor. There's one that there's disagreement on 9 that we can address either now or later. 10 THE COURT: Okay. Which one do you 11 have a disagreement on? Might as well do it now 12 before we go to the next deposition. 13 MS. MEYERS: Sure. So the exhibit 14 is -- it's invoice from Dr. Kipper. 15 THE COURT: What number is it? 16 MS. MEYERS: I'm sorry. 17 It is -- 18 MR. NADELHAFT: 1067 -- Defendant's 19 Exhibit 1067. 20 MS. MEYERS: That's correct. And we 21 have no objection to the document coming in. 22 THE COURT: Okay.	1237	1 And so like I said, we have no objection to the 2 total amounts coming in, but this is sort of 3 private information, how much he charges for each 4 service. 5 MR. NADELHAFT: And isn't it like the 6 nursing supervision that's actually -- I mean, I 7 think the jury should understand how it came out 8 in the final total, and there's really no reason. 9 THE COURT: What's the relevance of how 10 it came out to the final total? I just want to 11 know where you're coming from. 12 MR. NADELHAFT: So, you know, he 13 testified the nurse -- he saw the nurses every 14 day. I think it's relevant for the jury to see 15 that it was \$75,000 a month for, and I think it's 16 all relevant to how it added up so they can see 17 what the totals are. 18 THE COURT: All right. I'll allow it. 19 That's fine. 20 MS. MEYERS: I'm sorry, Your Honor. 21 THE COURT: I'll allow it. 22 MS. MEYERS: Other than the nursing
1236	1 MS. MEYERS: It's just we have a 2 disagreement about the redactions. 3 THE COURT: All right, you want to come 4 forward, and then we'll take a look at the -- and 5 you said 1067, correct? 6 MR. NADELHAFT: Correct, Your Honor. 7 (Sidebar.) 8 MR. NADELHAFT: So we made the 9 redactions on the exhibit. 10 THE COURT: Right. 11 MR. NADELHAFT: So there's the totals 12 at the bottom of each which we don't have an issue 13 with. They want these redacted, which are the -- 14 that adds up to the total. We don't think they 15 should be redacted because it's a business record. 16 There's no reason -- 17 THE COURT: All right. What's the 18 reason to redact them? 19 MS. MEYERS: Your Honor, this is a 20 financial record of a third party, and in 21 Dr. Kipper's deposition, his attorney objected 22 strenuously to the level of redaction on these.	1238	1 services, could we redact that? 2 MR. NADELHAFT: There's really nothing 3 personal here. 4 MS. MEYERS: Look, I just don't feel 5 comfortable because it's a third party, and I know 6 that there was an objection by Dr. Kipper's 7 counsel. 8 THE COURT: What are you really 9 concerned about? 10 MS. MEYERS: I know that, personally, I 11 am just expressing what Dr. Kipper's counsel 12 expressed to us during the deposition, which was 13 that this is financial information that's 14 protected under California law, and he objected to 15 the itemized services that reflected the cost per 16 service. 17 MR. NADELHAFT: The jury should -- I 18 don't think it's giving away any secrets. 19 THE COURT: I guess, because you say 20 how many hours they can figure out the hourly 21 rate. I see the document as one, his hourly rate. 22 I can see that as being an issue.

1239	1 I mean, is that relevant, his hourly 2 rate? I mean, it could -- did you want to just 3 have what was over here possibly? 4 MR. NADELHAFT: I mean how many hours 5 and then just not giving the rate? 6 MS. MEYERS: I mean, I'll stand on our 7 position, but I do accept that we should have some 8 redactions. 9 THE COURT: If we take out the hours, 10 then it's -- yes. 11 MS. MEYERS: But leave the number of 12 services, yeah. 13 MR. NADELHAFT: The column on each 14 page. 15 THE COURT: Okay. Is that fine? 16 MR. NADELHAFT: Yeah. 17 THE COURT: All right. Let's do that. 18 All the other ones you have for me? 19 MR. NADELHAFT: We'll get them back to 20 you. 21 THE COURT: All right. Thank you. 22 MS. BREDEHOFT: Your Honor, may I	1241	1 MS. BREDEHOFT: I mean, it's something 2 that what we may want to do is just address it 3 when we get to the arguments at the end. 4 THE COURT: Do you want me to at the 5 end of today, I could just bring him out 6 personally and talk with him? Or are you saying 7 you want to recuse him based on what you've seen? 8 MS. BREDEHOFT: Based on what I've 9 seen, I'd like to recuse him. I think he's shown 10 particular personal interest in Mr. Depp and made 11 a point of, you know, one day he was very friendly 12 with him. 13 THE COURT: Right. 14 MS. BREDEHOFT: The others, I mean, and 15 it's still happening. 16 MR. CHEW: He said, "Good morning" 17 before he even got to the front table. I don't 18 think there's something that -- 19 THE COURT: But he said, "Good morning, 20 Mr. Depp"? 21 MS. BREDEHOFT: He didn't say, "Good 22 morning, Mr. Depp." He said, "Good morning," and
1240	1 approach? 2 THE COURT: Okay. Sure. I keep going 3 back and forth. 4 MS. BREDEHOFT: I just wanted to say on 5 the record that that second to the right bottom 6 juror, when he walked in the first thing this 7 morning -- 8 THE COURT: Again? 9 MS. BREDEHOFT: -- he said, "Good 10 morning" to Mr. Depp. 11 MR. CHEW: We didn't see that. 12 MS. BREDEHOFT: I personally observed 13 it. 14 THE COURT: All right. Okay. We're 15 going to probably have to address him at some 16 point. Let me just -- it's that same juror again. 17 MR. CHEW: I didn't see a juror saying, 18 "Hello, Mr. Depp." 19 THE COURT: I'm going to watch him 20 through the day. Yeah, but he can't do that. And 21 he's been told, instructed, not to do that. 22 So...	1242	1 looked right at Mr. Depp. He was right there, 2 right -- 3 THE COURT: All right. Let me just 4 keep an eye out on him all day today, and then we 5 can address that. This is a long trial, so I've 6 got time. But I've got to focus more on him. 7 Okay. I will do that. 8 MR. CHEW: Thank you, Your Honor. 9 Appreciate it. 10 THE COURT: All right. I have 11 exhibits. 12 MS. MEYERS: These are the redacted 13 versions of the exhibits that we offered for 14 Dr. Kipper. 15 THE COURT: Okay. And there's no 16 objection to these? 17 MR. NADELHAFT: No objection. 18 THE COURT: Okay. 19 MR. NADELHAFT: The redacted ones. 20 THE COURT: The redacted. And which is 21 the one that's not redacted that's in evidence? 22 Top of my head.

Transcript of Jury Trial - Day 5  
Conducted on April 18, 2022

20 (1243 to  
1246)

1243	1 MS. MEYERS: I believe it's -- 2 MR. NADELHAFT: I believe those have 3 already been admitted. Oh, it was -- 4 THE COURT: You said there was one 5 that -- 6 MS. MEYERS: I have a chart. 7 THE COURT: No redactions, 42? 8 MR. NADELHAFT: Oh, yeah. 9 THE COURT: 42. So no redactions for 10 42, correct? 11 MS. MEYERS: That's correct. 12 THE COURT: Okay. So that's in 13 evidence without redactions and these are all the 14 ones with redactions? 15 MR. NADELHAFT: Yes. Your Honor, I 16 want to bring up one issue with one of the 17 depositions. 18 THE COURT: From Dr. Kipper's? 19 MR. NADELHAFT: From Dr. Kipper's. So 20 Dr. Kipper testified that he'd never recalled 21 Ms. Heard seeking medical treatment for any 22 injuries on the island. He said, "No, I haven't,"	1245	1 ruled this. This is a hearsay document. 2 MR. NADELHAFT: I know, and again, it's 3 a prior inconsistent statement. "Amber called us 4 around midnight. After he came home from the 5 house, she claims he pushed her," I mean 6 Dr. Kipper said -- never got a report. 7 MS. MEYERS: Your Honor, they had an 8 opportunity to cross-examine the doctor at the 9 deposition. 10 MR. NADELHAFT: Which we did. 11 THE COURT: And they did, and it was 12 taken out. You're saying the part that was taken 13 out -- 14 MS. MEYERS: Respectfully, I don't 15 think you impeached him with this, though. 16 THE COURT: Let me see what it says. 17 All right. 18 MR. NADELHAFT: And the next sentence 19 at the top and the answer. 20 THE COURT: Okay. All right. I assume 21 you stand on your previous objection. 22 MS. MEYERS: Absolutely.
1244	1 and then he also testified, "I never witnessed 2 Amber" -- "Did she ever seek treatment from you 3 for injuries? Did Ms. Heard ever tell you that 4 Mr. Depp abused her?" And he said, "No, she 5 didn't." And you had struck as hearsay him 6 testifying that Amber did tell him about being 7 pushed on the island -- 8 THE COURT: Okay. 9 MR. NADELHAFT: -- so I think that's a 10 prior inconsistent statement. Based on what Your 11 Honor said, it would just be -- 12 THE COURT: You're saying the part that 13 was played was something I had struck? 14 MR. NADELHAFT: No. We played the part 15 what he said, "She never reported to me that he 16 was abused," but you struck where she tells him -- 17 THE COURT: Right. I can't go 18 backwards on my deposition designations. 19 MR. NADELHAFT: Okay. So then I guess 20 I again I'm asking that the portion on 268 comes 21 in. 22 MS. MEYERS: Your Honor, we've already	1246	1 THE COURT: I understand. But I think 2 based on listening to -- which is hard when I 3 don't hear the depositions all the way through -- 4 it does sound like this part can be read to the 5 jury when they come back in. 6 MR. NADELHAFT: Okay. I just want to 7 make sure that I don't -- I want to make sure that 8 I don't do anything wrong. 9 THE COURT: I appreciate that. Just 10 for impeachment purpose? 11 MR. NADELHAFT: Right. 12 THE COURT: Because he said he had 13 never -- 14 MR. NADELHAFT: Right. Where do you 15 want me to start? 16? 16 MS. MEYERS: I actually believe that it 17 was Ms. Lloyd that was told that and not 18 Dr. Kipper. 19 THE COURT: You know -- 20 MR. NADELHAFT: "Ms. Lloyd told you 21 that, correct? 22 "She did tell us that, yes."

1247	1 THE COURT: "Tell us that." Oh, okay. 2 So didn't tell him that. He testified he said he 3 never heard that. 4 MR. NADELHAFT: But he had been told 5 that. 6 THE COURT: I'm not going to -- I'm 7 going to sustain the objection to leave it out, 8 okay. 9 MR. NADELHAFT: Okay. Because you're 10 saying "us" is -- I don't understand. He's saying 11 he never was informed, and "us" includes him. 12 THE COURT: Well, can we get -- pull 13 out -- we'll have to do this over lunch, but can 14 you pull out when Dr. Kipper -- what exactly I 15 allowed in, or you have it? 16 MR. NADELHAFT: Yeah. The first -- and 17 then I think here. 18 THE COURT: Well, this is the island, 19 August 2014? 20 MR. NADELHAFT: Which is what that -- 21 this is about. 22 THE COURT: I don't know.	1249	1 MR. CHEW: Yes, Your Honor. 2 THE COURT: Ms. Bredehoff, are you 3 ready for the jury? Are you ready for the jury? 4 MS. BREDEHOFT: Yes, Your Honor. 5 THE COURT: I just wanted to make sure. 6 That's fine, thank you. 7 (Whereupon, the jury entered the 8 courtroom and the following proceedings took 9 place.) 10 THE COURT: All right. Thank you. 11 Just for the record, I assume, Juror 12 Number 10, that that's your address to your 13 employer because you need a letter from your 14 employer; is that correct? 15 JUROR NUMBER 10: Yes. 16 THE COURT: Okay. So the Court is 17 going to do a letter for his employer so he can be 18 released from work for six weeks, so that's what 19 that information is just his employer's address, 20 okay. All right. Thank you. All right. Are you 21 ready for your next witness? 22 MR. CHEW: Yes, Your Honor. Mr. Depp
1248	1 MR. NADELHAFT: Well... 2 THE COURT: I just want to make sure. 3 MR. NADELHAFT: And then this, "Did 4 Ms. Heard ever tell you that Mr. Depp abused her? 5 "No, she did not." 6 MS. MEYERS: Your Honor, if they wanted 7 to sort of flesh this out on the deposition, they 8 could have. I believe it's unclear, and I believe 9 that actually the documentary evidence is what 10 technically -- 11 MR. NADELHAFT: Again, we did -- 12 THE COURT: I understand. But we went 13 through all the depositions. We had the time to 14 argue it at that point. I'm going to stay with my 15 initial objections, okay? 16 MR. NADELHAFT: Okay. Thank you, Your 17 Honor. 18 MS. MEYERS: Thank you. 19 THE COURT: All right. 20 (Open court.) 21 THE COURT: All right. Are we ready 22 for the jury?	1250	1 calls Debbie Lloyd, but via videotape. 2 THE COURT: By deposition, okay. 3 EXAMINATION BY COUNSEL FOR THE DEFENDANT AND 4 COUNTERCLAIM PLAINTIFF 5 BY MR. NADELHAFT: 6 A Yes. 7 Q And you do not work or live in 8 Virginia, correct? 9 A Correct. 10 Q Have you, at any time, spoken with -- 11 can you please provide your full name? 12 A Deborah Lynn Lloyd. 13 Q And Ms. Lloyd, you live in California? 14 A Yes. 15 Q And you work in California? 16 A Yes. 17 Q And you do not live or work in 18 Virginia, correct? 19 A Correct. 20 Q Have you, at any time, spoken with 21 Mr. Depp or any of his counsel, either in 22 preparation for this deposition or for any other

1251	1 matter after you no longer worked with Mr. Depp? 2 <b>A Yes.</b> 3 Q Do you recall who you spoke to? 4 <b>A I believe her name was Camille.</b> 5 Q And do you recall when you spoke to 6 Camille, approximately? 7 <b>A Two weeks ago.</b> 8 Q Okay. And what did Camille and you 9 discuss? 10 <b>A She had asked me if Johnny had ever</b> 11 <b>thrown anything at me.</b> 12 Q And what did you say? 13 <b>A No.</b> 14 Q Were there any other -- was that the 15 total of your communications with Camille? 16 <b>A That was the only time that I remember</b> 17 <b>speaking to her.</b> 18 Q Did you speak about anything else other 19 than whether -- and when you say "Johnny," I 20 assume you mean Mr. Depp, correct? 21 <b>A Yes.</b> 22 Q Did you have any other -- did you	1253	1 Q Do you recall if it was a man or a 2 woman? 3 <b>A A man.</b> 4 Q Did you ever speak to Adam Waldman? 5 <b>A I know an Adam reached out to me a long</b> 6 <b>time ago. I don't remember a last name.</b> 7 Q You're a psychiatric mental health 8 nurse practitioner? 9 <b>A Yes.</b> 10 Q Can you briefly explain what that is? 11 <b>A I'm a nurse practitioner that</b> 12 <b>specializes in psychiatry.</b> 13 Q And did you go to -- where did you go 14 to school for that? 15 <b>A I got my master's from Maryville</b> 16 <b>University.</b> 17 Q Is that in California? 18 <b>A It's in Illinois.</b> 19 Q And -- 20 <b>A No, it's not. It's in Missouri,</b> 21 <b>St. Louis, Missouri, sorry.</b> 22 Q No problem. And I understand you're
1252	1 discuss anything else other than whether Mr. Depp 2 had thrown something at you? 3 <b>A They had asked if I would be willing to</b> 4 <b>go to Virginia to the trial.</b> 5 Q And are you willing to go to Virginia 6 to be a trial witness? 7 <b>A No.</b> 8 Q Did you -- at any time, did you -- did 9 you have any other -- do you recall anything else 10 you and Camille spoke about? 11 <b>A Not in detail.</b> 12 Q Do you know how long the conversation 13 was, approximately? 14 <b>A Approximately 15 minutes.</b> 15 Q Was it over the phone? 16 <b>A Yes.</b> 17 Q Do you recall at any other time having 18 any other communications with any other counsel 19 for Mr. Depp? 20 <b>A No. There was somebody else on that</b> 21 <b>call, I believe, from his side, but I don't know</b> 22 <b>who it was.</b>	1254	1 also a certified addiction nurse. 2 <b>A Yes.</b> 3 Q And can you briefly explain what that 4 is? 5 <b>A I had to get a certification in</b> 6 <b>addiction nursing.</b> 7 Q And what is addiction nursing? 8 <b>A Nursing that specializes in taking care</b> 9 <b>of patients with chemical dependency issues.</b> 10 Q And chemical dependency, that's drugs 11 and alcohol? 12 <b>A Yes.</b> 13 Q How long have you worked in those 14 fields, addiction nursing and mental health 15 nursing? 16 <b>A Since 2004.</b> 17 Q And would you agree that one of your 18 specialties is concierge addiction services? 19 <b>A It was, yes.</b> 20 Q What are concierge addiction services? 21 <b>A We would -- that's a good question.</b> 22 <b>I mainly deal with higher-end clients</b>

1255	<p>1 <b>and provide care -- go to their home rather than</b> 2 <b>have them come into facilities.</b> 3 Q And would you, at times, provide 24/7 4 nursing care? 5 <b>A Yes.</b> 6 Q And you'd also be a patient's travel 7 companion for nursing care? 8 <b>A Yes.</b> 9 Q And you own your own company? 10 <b>A Yes.</b> 11 Q And what was the company's name? 12 <b>A Turning Point.</b> 13 Q And do you still own Turning Point? 14 <b>A Yes.</b> 15 Q And what does Turning Point do? 16 <b>A Provides services. It's actually no</b> 17 <b>longer -- I still own it, but I don't work with it</b> 18 <b>anymore. It provides services to either nursing</b> 19 <b>or sober companion services to patients.</b> 20 Q And when did you start Turning Point? 21 <b>A I don't recall the exact year.</b> 22 Q Does anyone else own it?</p>	1257	<p>1 <b>A Nurse practitioner, I can diagnose and</b> 2 <b>prescribe medications underneath a doctor's</b> 3 <b>supervision.</b> 4 Q So when you were working at Turning 5 Point, or when you owned -- when you were working 6 at Turning Point, were you a nurse practitioner? 7 <b>A No.</b> 8 Q What was your title then? 9 <b>A Registered nurse.</b> 10 Q And you performed work for Mr. Depp, 11 correct? 12 <b>A Yes.</b> 13 Q Was that with Turning Point? 14 <b>A Turning Point was contracted through</b> 15 <b>Dr. Kipper.</b> 16 Q Can you explain how that arose, how you 17 began to work for Mr. Depp through Dr. Kipper? 18 <b>A Dr. Kipper was his doctor, and he</b> 19 <b>needed nursing services, so Dr. Kipper reached out</b> 20 <b>to me.</b> 21 Q And it's Dr. David Kipper, correct? 22 <b>A Correct.</b></p>
1256	<p>1 <b>A No.</b> 2 Q How many people work at Turning Point? 3 <b>A I'm the only employee.</b> 4 Q And what do you have, contract nurses 5 who worked for you? 6 <b>A I did, yes.</b> 7 Q And what does Turning Point do now, if 8 anything? 9 <b>A Sits dormant.</b> 10 Q Okay. And when did it start to sit 11 dormant? 12 <b>A About two years ago.</b> 13 Q Is there any particular reason why? 14 <b>A That's when I became a nurse</b> 15 <b>practitioner and changed my career path.</b> 16 Q And where do you work now? 17 <b>A I work for Headlands Addiction</b> 18 <b>Treatment Services.</b> 19 Q What do you do there? 20 <b>A Nurse practitioner.</b> 21 Q Okay. Is there a difference between a 22 nurse practitioner and a nurse?</p>	1258	<p>1 Q Had you worked with Dr. Kipper before 2 working with Mr. Depp? 3 <b>A Yes.</b> 4 Q Do you know when you started working 5 for Mr. Depp, approximately? 6 <b>A Approximately, I think it was 2015 or</b> 7 <b>'16.</b> 8 Q And we can look at some documents, and 9 that may help. 10 Do you recall how many patients you had 11 worked with Dr. Kipper before working with 12 Mr. Depp? 13 <b>A That would be a guesstimate.</b> 14 Q Okay. Do you have any approximation? 15 <b>A 20.</b> 16 Q And when Dr. Kipper reached out to you 17 about Mr. Depp, did he reach out to you by phone 18 or by written communication? 19 <b>A By phone.</b> 20 Q Do you recall what Dr. Kipper told you 21 he was looking for in regards to Mr. Depp's care? 22 <b>A Detox.</b></p>



1259	1261
<p>1 Q And detox from what? 2 A <b>Originally, I don't think I knew any of</b> 3 <b>the specifics.</b> 4 Q What did you come to understand 5 Mr. Depp was looking to detox from? 6 A <b>Opiates.</b> 7 Q Any other medication or any other drugs 8 that Mr. Depp was looking to detox from? 9 A <b>Not that I recall.</b> 10 Q Do you know if Mr. Depp ever took 11 cocaine? 12 A <b>I never witnessed him use any cocaine.</b> 13 Q Okay. So did Dr. Kipper contract with 14 your company for care for Mr. Depp? 15 A <b>I don't recall the specifics of how we</b> 16 <b>were brought on.</b> 17 Q Well, okay. How were you -- how were 18 you paid? 19 A <b>Through Dr. Kipper.</b> 20 Q Did you have to submit your time to 21 Dr. Kipper -- 22 A <b>Yes.</b></p>	<p>1 Q Okay. Do you still do work for 2 Dr. Kipper? 3 A <b>I have not recently.</b> 4 Q Do you recall when you last worked with 5 Dr. Kipper? 6 A <b>Not exactly.</b> 7 Q Do you remember the year you stopped 8 working with Dr. Kipper? 9 A <b>No.</b> 10 Q Okay. Do you recall the last time 11 you've spoken to Dr. Kipper? 12 A <b>This week, last week.</b> 13 Q What did you talk to Dr. Kipper about 14 this week? 15 A <b>He's my personal doctor.</b> 16 Q So did you speak to Dr. Kipper at all 17 about this case? 18 A <b>No.</b> 19 Q Have you ever spoken to Dr. Kipper 20 about your deposition? 21 A <b>No.</b> 22 Q Have you ever spoken to Dr. Kipper</p>
1260	1262
<p>1 Q -- for Mr. Depp's services? 2 Did Mr. Depp ever pay you directly? 3 A <b>No.</b> 4 Q Did you ever get any gifts from 5 Mr. Depp? 6 A <b>Yes.</b> 7 Q What gifts did you receive from 8 Mr. Depp? 9 A <b>I remember getting a jewelry box and</b> 10 <b>a -- I forget what it's called -- like a notepad,</b> 11 <b>a fancy notepad, I guess.</b> 12 Q Do you recall why he -- Mr. Depp gave 13 you the jewelry box? 14 You can answer that. 15 A <b>I don't know why. I believed it was</b> 16 <b>a -- for a thank-you.</b> 17 Q And the same, you believe it was a 18 thank-you for the fancy notepad that you received? 19 A <b>It was at the same time.</b> 20 Q Okay. Did you receive anything else, 21 ever, from Mr. Depp? 22 A <b>Not that I recall.</b></p>	<p>1 about his deposition? 2 A <b>Yes.</b> 3 Q And you know who Erin Boerum is, 4 correct? 5 A <b>Yes.</b> 6 Q And who is she? 7 A <b>She's a nurse that worked with us.</b> 8 Q And Ms. Boerum worked for Turning 9 Point; is that right? 10 A <b>Yes.</b> 11 Q And she -- and did you hire Ms. Boerum? 12 A <b>Yes.</b> 13 Q Was Erin -- was Ms. Boerum a salaried 14 employee of Turning Point? 15 A <b>No.</b> 16 Q So Ms. Boerum was a contract 17 attorney -- a contract employee for Turning Point, 18 correct? 19 A <b>Correct.</b> 20 Q So in kind of a general sense, how did 21 that work with Ms. Boerum at Turning Point. 22 MS. MEYERS: Objection; vague.</p>

1263	1 Q If you needed her for a particular 2 case, you'd hire her for that case? 3 A Yes. 4 Q Okay. Your testimony is that you had 5 hired Ms. Boerum previously for other patients; is 6 that right, before Mr. Depp and Ms. Heard? 7 A Yes. 8 Q Okay. And do you recall how Ms. Boerum 9 came to work for Mr. Depp and Ms. Heard? 10 THE REPORTER: And do you recall how 11 Ms. Boerum came to work for Mr. Depp and 12 Ms. Heard? 13 A Yes. 14 Q How did that happen? What happened? 15 A I was taking care of Johnny, and 16 Amber -- it was decided that Amber needed some 17 support, so I brought her in for Amber. 18 Q So were you Mr. Depp's primary nurse? 19 A Yes. 20 Q And was Ms. Boerum Amber's primary 21 nurse? 22 A Yes.	1265	1 Q And what is Lloyd Exhibit 1? 2 A My nursing notes. 3 Q Okay. And so these are the notes that 4 you created? 5 A Yes. 6 Q And these are notes you created for 7 your care of Mr. Depp; is that right? 8 A Correct. 9 Q And if at the break, you want to go 10 over and see the whole thing, you know, I'm happy 11 to let you do that just to save time, rather than 12 having you read 123 pages. 13 But did you create these notes in the 14 ordinary course of business? 15 A Can you clarify what that means? 16 Q You created these notes as part of your 17 job of being a nurse, correct? 18 A Yes. 19 Q Okay. Did Dr. Kipper ask you to keep 20 these notes? 21 A We just keep notes as nurses. I don't 22 recall.
1264	1 Q And would you ever share 2 responsibilities where Ms. Boerum would perform 3 nursing care for Mr. Depp and you would perform 4 nursing care for Amber? 5 A I know Erin covered for me a few times. 6 I do not believe I ever cared for Amber. 7 Q And you said that a decision was made 8 that Amber needed nursing care? 9 A Yes. 10 Q Who made that decision? 11 A I don't recall. 12 MR. NADELHAFT: Can we put up 13 Attachment 2, and we'll call this Lloyd Exhibit 1. 14 AV TECHNICIAN: Please stand by. 15 MR. NADELHAFT: Thanks. 16 AV TECHNICIAN: Exhibit 1. 17 Q Ms. Lloyd, I'm showing you what's been 18 marked as Lloyd Exhibit 1. You'll see it's many 19 pages, and we're going to go through some of these 20 during the day. But just looking at it, do you 21 recognize what this is? 22 A Yes.	1266	1 Q So this is your normal practice, 2 keeping these notes; it's not particular to 3 Mr. Depp, correct? 4 A Correct. 5 Q Did you receive any training into how 6 to keep these notes? 7 A Nursing school. 8 Q Okay. And the notes are typed, right? 9 A Yes. 10 Q Okay. Did you bring a laptop with you 11 when you were working with Mr. Depp? 12 A Yes. 13 Q Let's just go to the first one. It 14 says June 12th, 2014, 23:00. 15 Do you see that? 16 A Yes. 17 Q And 23:00, that's military time, 18 correct? 19 A Yes. 20 Q So that's 11:00 p.m. at night? 21 A Yes. 22 Q Okay. And it says, "RN and MD met with

1267	1 patient to discuss plan and medication regime." 2 Do you see that? 3 <b>A Yes.</b> 4 Q The "RN" is you, correct? 5 <b>A Correct.</b> 6 Q And the "MD" is Dr. Kipper? 7 <b>A Correct.</b> 8 Q And "the patient" is Mr. Depp, right? 9 <b>A Correct.</b> 10 Q Okay. So where it says 6/12/14 at 11 23:00, is that when you met with Mr. Depp? Or 12 that when you wrote up the note? 13 <b>A That's when I wrote up the note.</b> 14 Q Okay. So you may have met with 15 Mr. Depp at some other time before this? 16 <b>A Sometime during that day.</b> 17 Q Okay. So the time you have here is 18 when you wrote the note? 19 <b>A Correct.</b> 20 Q Okay. And would you typically type the 21 notes as opposed to writing notes and handwriting 22 and then typing the notes?	1269	1 <b>A According to my notes. I don't recall.</b> 2 Q Okay. And in the second line, you 3 write, "He stated that he initially started taking 4 opiates after some dental work and became 5 dependent on them." 6 Is that something that Mr. Depp told 7 you? 8 <b>A According to my notes.</b> 9 Q Would there be a reason you would write 10 that if Mr. Depp did not tell you that? 11 <b>A No.</b> 12 Q Okay. And then you write, "Patient is 13 fearful of coming off of opiates but knows it's 14 what he needs to do." 15 So, again, that's something, according 16 to your notes, that Mr. Depp told you? 17 <b>A According to my note, yes.</b> 18 Q And then it says, "Patient also 19 expressed some emotional trauma which causes him 20 depression and anxiety." 21 Again, according to your notes, that's 22 what Mr. Depp told you?
1268	1 <b>A Correct.</b> 2 Q Okay. Did anyone review the notes? 3 MS. HICKOX: You can answer if you 4 know. 5 <b>A Notes were sent to Dr. Kipper.</b> 6 Q How often would you send the notes to 7 Dr. Kipper? 8 <b>A I don't recall.</b> 9 Q And was there a system where you could 10 see the notes, or did you email him, Dr. Kipper, 11 the notes? 12 <b>A Email.</b> 13 Q Okay. So is it your understanding 14 based on these notes that the first time you met 15 Mr. Depp was on June 12th, 2014? 16 <b>A Yes.</b> 17 Q And if we scroll down to the 6/13/14, 18 this says you met with patient in his apartment, 19 correct? 20 <b>A Correct.</b> 21 Q So the next day you met with Mr. Depp 22 in his apartment; is that right?	1270	1 <b>A According to my notes, yes.</b> 2 Q Do you recall at all what the emotional 3 trauma was that was causing Mr. Depp depression 4 and anxiety? 5 <b>A I do not recall.</b> 6 Q Let me ask this again. Do you recall 7 what the plan was for Mr. Depp's detox as of the 8 end of June 2014? 9 <b>A "Plan" in what regards?</b> 10 Q Where was Mr. Depp's detox going to 11 take place? 12 <b>A I don't remember when it was 13 determined, but I remember that it was after 14 filming, we would go to the island.</b> 15 Q And that's the island that Mr. Depp 16 owns? 17 <b>A Yes.</b> 18 Q And you went to the island, correct? 19 <b>A Correct.</b> 20 Q Who else was on the island in this time 21 when Mr. Depp was doing the detox? 22 MS. HICKOX: You can answer if you

1271	<p>1 know.</p> <p>2 <b>A I know I was there. I cannot remember</b></p> <p>3 <b>if Amber was there the entire time. And some of</b></p> <p>4 <b>Johnny's staff and Dr. Kipper came at some point.</b></p> <p>5 Q How did you get to Mr. Depp's island?</p> <p>6 <b>A Flew.</b></p> <p>7 Q And then would you take a boat to his</p> <p>8 island?</p> <p>9 <b>A Yes.</b></p> <p>10 Q Okay. And if we go to, in the same</p> <p>11 document, Kipper 69, which I believe is page 17,</p> <p>12 there we go, we see where it says "8/8/14"?</p> <p>13 <b>A Yes.</b></p> <p>14 Q And it says, "arrived on island today"?</p> <p>15 <b>A Yes.</b></p> <p>16 Q Does that mean that you arrived on the</p> <p>17 island on August 8th, 2014?</p> <p>18 <b>A According to my notes.</b></p> <p>19 Q Okay. And on August 9th, 2014, it</p> <p>20 says, "Patient expressed fears of never feeling</p> <p>21 normal without his drugs."</p> <p>22 You wrote that?</p>	1273	<p>1 <b>yes.</b></p> <p>2 Q And does this refresh your recollection</p> <p>3 that Amber was, at least at some point, on the</p> <p>4 island with Mr. Depp during the detox?</p> <p>5 <b>A Yes.</b></p> <p>6 Q The gray part of the text is your text,</p> <p>7 correct?</p> <p>8 <b>A Yes.</b></p> <p>9 Q And the blue is Amber?</p> <p>10 <b>A Yes.</b></p> <p>11 Q And in the gray part of the text where</p> <p>12 it shows the phone number there, is that your cell</p> <p>13 phone number?</p> <p>14 <b>A Yes.</b></p> <p>15 Q Ms. Lloyd, I'm showing you what's been</p> <p>16 marked as Exhibit 3, a text message chain between</p> <p>17 you and Amber Heard on August 16th, 2014. And,</p> <p>18 again, in the gray box where it shows a phone</p> <p>19 number, that's your phone number, correct?</p> <p>20 <b>A Correct.</b></p> <p>21 Q Okay. And, Ms. Lloyd, I'm showing you</p> <p>22 what's been marked as Lloyd Exhibit 4, a text</p>
1272	<p>1 <b>A Yes.</b></p> <p>2 Q And is that something that Mr. Depp</p> <p>3 told you?</p> <p>4 <b>A According to my notes, yes.</b></p> <p>5 Q Okay. And if we go two pages to</p> <p>6 Kipper 71 -- oh, you could, yeah, there we go --</p> <p>7 do you see where it says at the top, "MD's flight</p> <p>8 has been canceled" --</p> <p>9 <b>A Yes.</b></p> <p>10 Q -- "Arrangements are being made for him</p> <p>11 to arrive on the island 8/12/14"?</p> <p>12 <b>A Yes.</b></p> <p>13 Q So according to your notes, Dr. Kipper,</p> <p>14 after the flight was canceled, was set to arrive</p> <p>15 on the island on August 12th, 2014?</p> <p>16 <b>A According to my notes.</b></p> <p>17 Q Ms. Lloyd, I'm showing you what's been</p> <p>18 marked as Exhibit -- Lloyd Exhibit 2, which is</p> <p>19 ALH 16110 through -113.</p> <p>20 Do you remember texting with Amber at</p> <p>21 all while you were on the island with Mr. Depp?</p> <p>22 <b>A That is some of how we communicated,</b></p>	1274	<p>1 message chain between you and Amber on</p> <p>2 August 18th, 2014.</p> <p>3 Do you see that?</p> <p>4 <b>A Yes.</b></p> <p>5 Q Okay. Do you recall, when on the</p> <p>6 island, Amber would be telling you how Mr. Depp</p> <p>7 was doing?</p> <p>8 <b>A According to these texts, that's what</b></p> <p>9 <b>was happening, yes.</b></p> <p>10 Q Do you recall how long you were on the</p> <p>11 island?</p> <p>12 <b>A I do not.</b></p> <p>13 Q In a day, do you recall how long you</p> <p>14 would see Mr. Depp?</p> <p>15 <b>A It varied.</b></p> <p>16 Q Okay. Would there be reasons why it</p> <p>17 varied as to how long you'd see Mr. Depp in a day?</p> <p>18 <b>A I don't recall what -- how it was</b></p> <p>19 <b>determined.</b></p> <p>20 Q How far away were you from where</p> <p>21 Mr. Depp was staying?</p> <p>22 <b>A Five to ten minutes.</b></p>

<p style="text-align: right;">1275</p> <p>1 Q By foot or by something, some other 2 transportation? 3 A <b>By a John Deere tractor.</b> 4 Q And where -- what type of place were 5 you staying in on the island? 6 A <b>It was a yurt.</b> 7 Q Okay. And were you staying with 8 anyone? 9 A <b>I was by myself some of the time, and 10 then Dr. Kipper was also in the yurt for some of 11 the time.</b> 12 Q And did the yurt have separate rooms? 13 A <b>Yes.</b> 14 Q And would you typically eat with 15 Mr. Depp? 16 A <b>Varied.</b> 17 Q And what was your -- when you were on 18 the island, what was your role in terms of 19 Mr. Depp's detox? 20 A <b>Medication management.</b> 21 Q And what do you mean by "medication 22 management"?</p>	<p style="text-align: right;">1277</p> <p>1 been about an hour. Take a, I don't know, how 2 long, five-minute break? 3 Q Is there any reason for you to believe 4 where you wrote, "RN received text from fiancé," 5 that that's not a text from Amber Heard"? 6 A <b>No.</b> 7 Q Lloyd Exhibit 5 is a chart of text 8 messages we received from -- in a production from 9 Mr. Depp. It is DEPP 7819. 10 Do you see the second entry, entry 131? 11 A <b>Yes.</b> 12 Q And where in the third row there's your 13 name, and above that name is a phone number. Is 14 that your phone number? 15 A <b>Yes.</b> 16 Q And you would sometimes text message 17 with Mr. Depp too, correct? 18 A <b>Correct.</b> 19 Q You see it says in the body on that 20 row 131, "I'll come by 80 within an hour to drop 21 meds off just in case. How are you feeling? Your 22 head back on straight?"</p>
<p style="text-align: right;">1276</p> <p>1 A <b>To administer medications.</b> 2 Q And was Dr. Kipper the person who was 3 prescribing the medications? 4 A <b>Yes.</b> 5 Q As part of the medication management, 6 did Mr. Depp get a bag of meds? You can answer to 7 the extent you know. 8 A <b>Did I give Mr. Depp a bag of 9 medication?</b> 10 Q Either you or Dr. Kipper. 11 A <b>Not that I recall.</b> 12 Q Staying on this last page for a second, 13 of Lloyd 4, the picture of, looks like a pill box, 14 right? 15 A <b>Correct.</b> 16 Q Would you have provided either Mr. Depp 17 or Ms. Heard Mr. Depp's medications in a box like 18 this? 19 A <b>Yes.</b> 20 Q Okay. 21 MR. NADELHAFT: Well, why don't we 22 actually just take a break for this moment. We've</p>	<p style="text-align: right;">1278</p> <p>1 Do you see that? 2 A <b>I see that.</b> 3 Q And this was a text you wrote to 4 Mr. Depp? 5 A <b>According to this.</b> 6 Q All right. Do you recall, as of around 7 August 26th, 2014, what you meant by "your head 8 back on straight?" 9 A <b>I don't recall.</b> 10 Q And then Mr. Depp responded to you, do 11 you see in the next row, "Pretty much. I don't 12 have the ability to take anything more on my back 13 right now... I'm fucking strong... if my arm is 14 gangrenous, I would cut off -- I would cut the 15 fucker off. If I am threatened by the love I 16 feel... I need to stop. Simple math." 17 Do you recall receiving that text from 18 Mr. Depp? 19 A <b>I don't recall. No, I don't recall 20 receiving that.</b> 21 Q Okay. Do you have any reason to 22 believe you did not receive this text from</p>

1279	<p>1 Mr. Depp? 2 <b>A No.</b> 3 Q If we go back to Exhibit 1, and if you 4 can go to Kipper 101. 5 And you see where it says "0125" under 6 September 22nd, 2014? 7 <b>A Yes.</b> 8 Q And you wrote, "RN received text from 9 patient stating that he had been in an argument 10 with fiancé and she 'had a nasty freakout' and he 11 would like RN to come give him some 'some fucking 12 knockout yum yum.' RN instructed patient to take 13 PRN Neurontin 300 milligrams prn and Seroquel 14 50 milligrams and that RN was on her way over." 15 You wrote that? 16 <b>A Yes.</b> 17 Q Do you recall anything about what the 18 "nasty freakout" that Mr. Depp was referring to 19 about Amber? 20 <b>A I do not recall.</b> 21 Q And then you see the note for 3:30 for 22 September 22nd, 2014?</p>	1281	<p>1 Q Do you have any reason to believe where 2 you wrote that -- you wrote, "Upon arriving at the 3 home, patient was sitting in the kitchen with 4 scraped and bloody knuckles on right hand." 5 Would you have written that based on 6 your observation of Mr. Depp? 7 <b>A Yes.</b> 8 Q On Kipper 111, there's a highlighted 9 note at 19:30 for October 14th. 10 Do you see that? 11 <b>A Oh, wait. One minute. Yes.</b> 12 Q And you wrote, "Patient finished 13 filming and was extremely agitated leaving the 14 set. Patient kicked in the door of his trailer 15 and refused to speak to director. Patient was 16 verbally aggressive to another person on the set 17 so no apparent -- for no apparent reason. Per MD 18 patient is to take Xanax 2-milligrams to reduce 19 his agitation at this time." 20 You wrote that? 21 <b>A According to these notes, yes.</b> 22 Q And was -- were these notes based on</p>
1280	<p>1 <b>A Yes.</b> 2 Q And, again, that's 3:30 in the morning, 3 right? 4 <b>A Correct.</b> 5 Q And you wrote, "Upon arriving at the 6 home, patient was sitting in kitchen with scraped 7 and bloody knuckles on right hand. Patient stated 8 he punched white board in kitchen after fight. 9 Patient stated he had been texting his friend 10 explaining why he didn't show up to play music and 11 fiancé got upset that he was not giving her enough 12 support and the fight escalated from there." 13 You wrote that note? 14 <b>A According to this, yes.</b> 15 Q Do you recall going to Mr. Depp's home 16 and seeing him with scraped and bloody knuckles on 17 his right hand? 18 <b>A I do not recall.</b> 19 Q Do you ever recall any incident where 20 Mr. Depp had claimed he punched a whiteboard in 21 the kitchen? 22 <b>A I do not.</b></p>	1282	<p>1 your observation of Mr. Depp? 2 <b>A I don't recall.</b> 3 Q Would you go to -- would you have -- 4 did you ever attend filming where Mr. Depp was 5 filming? 6 <b>A Yes.</b> 7 Q Where you wrote, "Patient kicked in the 8 door of his trailer and refused to speak to 9 director," that's based on your observation of 10 Mr. Depp? 11 <b>A I don't recall.</b> 12 Q Where you wrote, "Patient was verbally 13 aggressive to another person on the set so no 14 apparent reason," do you recall what that's based 15 on? 16 <b>A I do not.</b> 17 Q Would it have been based on anything 18 other than your observation of Mr. Depp? 19 <b>A I don't recall.</b> 20 Q If you had been told that Mr. Depp was 21 verbally aggressive, would you have written that 22 in your note?</p>

1283	<p>1 <b>A I don't recall.</b></p> <p>2 Q And the note above it for 16:30, do you</p> <p>3 see that?</p> <p>4 <b>A Yes.</b></p> <p>5 Q You wrote, "RN and MD arrived on set to</p> <p>6 assess patient."</p> <p>7 So that's you and Dr. Kipper, correct?</p> <p>8 <b>A Correct.</b></p> <p>9 Q And you wrote, "Patient appeared</p> <p>10 agitated and was short towards RN."</p> <p>11 You wrote that?</p> <p>12 <b>A According to this, yes.</b></p> <p>13 Q And where you wrote, "Patient appeared</p> <p>14 agitated and was short towards RN," meaning</p> <p>15 Mr. Depp was short towards you, correct?</p> <p>16 <b>A I don't remember.</b></p> <p>17 Q That's what you -- that's what the note</p> <p>18 means, right? Is there a reason for it?</p> <p>19 <b>A That's what the note means, yes.</b></p> <p>20 Q All right. And this note would have</p> <p>21 been based on your observation of Mr. Depp at the</p> <p>22 time, correct?</p>	1285	<p>1 through it.</p> <p>2 <b>A Okay.</b></p> <p>3 Q Mr. Depp wrote, "I'm all right.</p> <p>4 Confused as fuck. She said nothing of last night</p> <p>5 and, most certainly, not one thing about -- of the</p> <p>6 wrap party's existence. All the proof that I</p> <p>7 predicted last night... How will I look at her</p> <p>8 when she gets back professing her undying love...</p> <p>9 All a fucking lie... I for sure, unfortunately,</p> <p>10 wouldn't mind some company, but... I've inundated</p> <p>11 you with too much already. Love love... Me."</p> <p>12 That's a text that you received from</p> <p>13 Mr. Depp?</p> <p>14 <b>A I don't recall.</b></p> <p>15 AV TECHNICIAN: Exhibit 9.</p> <p>16 Q And this is more texts between you and</p> <p>17 Mr. Depp that you can take a look at through.</p> <p>18 On November 11th, 2014, Mr. Depp wrote,</p> <p>19 "All good. Haven't read her text yet... Am</p> <p>20 feeling so fucked... Why is she at the goddamn</p> <p>21 wrap party until 5:00 a.m.? Did Erin say</p> <p>22 anything? The lies are so clear, now. They are</p>
1284	<p>1 <b>A I don't remember.</b></p> <p>2 Q And then you see under October 15th,</p> <p>3 there's another highlighted entry, correct?</p> <p>4 <b>A Yes.</b></p> <p>5 Q And you wrote, "Patient awake and</p> <p>6 states he slept from 22:00 to 4:30."</p> <p>7 Do you see that?</p> <p>8 <b>A Yes.</b></p> <p>9 Q "Patient continues to be agitated about</p> <p>10 work and is verbalizing having desire to escape</p> <p>11 with drugs," you wrote that?</p> <p>12 <b>A It's in my notes.</b></p> <p>13 Q And that would mean that you wrote that</p> <p>14 note, correct?</p> <p>15 <b>A Correct.</b></p> <p>16 Q And you would have written that note</p> <p>17 based off Mr. Depp telling you he had a desire to</p> <p>18 escape with drugs, correct? I'm sorry, did you</p> <p>19 answer?</p> <p>20 <b>A Yes. I said I don't remember.</b></p> <p>21 Q Okay. And this is Exhibit 8, more</p> <p>22 texts between you and Mr. Depp. Feel free to look</p>	1286	<p>1 making me nuts, wondering what was so interesting</p> <p>2 to keep her there that goddamn long. Please ask</p> <p>3 Erin. I must have truth. I need it... It's not</p> <p>4 the easiest thing to do, at this point... Though,</p> <p>5 it has been a shitty and painful experience... I</p> <p>6 cannot help but hear her voice begging and crying.</p> <p>7 She wants to change and is going to change,</p> <p>8 et cetera. Help... I don't know what's real and</p> <p>9 what's paranoiac jealousy."</p> <p>10 You received that text from Mr. Depp?</p> <p>11 <b>A I don't recall.</b></p> <p>12 Q And you don't recall -- do you recall,</p> <p>13 ever, Mr. Depp not feeling trust for Amber?</p> <p>14 <b>A I don't recall.</b></p> <p>15 Q While you were working with Mr. Depp,</p> <p>16 did he smoke marijuana?</p> <p>17 <b>A I don't recall.</b></p> <p>18 Q Do you recall if he took any -- if not</p> <p>19 smoked marijuana, ingested marijuana in any sort</p> <p>20 of way?</p> <p>21 <b>A I don't recall.</b></p> <p>22 AV TECHNICIAN: Exhibit 10.</p>

1287	1 Q Can you think of another instance where 2 there was a patient -- without giving me the 3 patient's name or information -- where they were 4 allowed to continue to take marijuana while 5 detoxing from other drugs? 6 <b>A I don't recall.</b> 7 Q Exhibit 11 is LLOYD 2 through 5. Do 8 you recall producing documents in this matter? 9 <b>A Yes.</b> 10 Q And you produced text messages with 11 Mr. Depp and with Ms. Heard. 12 <b>A Yes.</b> 13 Q And this is a text message between you 14 and Amber starting on December 26th, 2014. 15 Do you see that? 16 <b>A Yes.</b> 17 Q Okay. And you understand that you're 18 in the -- the texts from you are the blue, 19 correct? 20 <b>A Okay.</b> 21 Q All right. You wrote, "Sorry to bother 22 you. Is JD up? He has an important appointment	1289	1 <b>A I don't recall.</b> 2 Q Do you recall Mr. Depp ever not taking 3 the medications he was prescribed? 4 <b>A Yes.</b> 5 Q Okay. Do you recall Mr. Depp sometimes 6 potentially doubling the medications that he was 7 prescribed? 8 <b>A I recall thinking that at times.</b> 9 Q Do you recall that Mr. Depp wanted to 10 detox off of drugs? What was your answer? 11 <b>A Yes.</b> 12 Q And how did Mr. Depp show you that? 13 <b>A It was on his own free will that he 14 hired us to be with him.</b> 15 Q And then did Mr. Depp have any relapses 16 with drugs when you were working with him? 17 <b>A I don't recall.</b> 18 Q Do you recall Mr. Depp in working with 19 him, ever take cocaine? Not that you necessarily 20 saw him, but that you understood that he took 21 cocaine? 22 <b>A I never saw Mr. Depp use cocaine.</b>
1288	1 at 2:00 p.m. and he isn't responding to me. Hope 2 you guys had a beautiful Christmas." 3 And Amber wrote, "Hey there. Yes he 4 is. He's opening presents with Lily-Rose. What 5 appointment? Is he being picked up?" 6 Who's Lily-Rose? 7 <b>A Johnny's daughter.</b> 8 Q Did you ever see Mr. Depp super stoned 9 when you were working with him? 10 <b>A I don't recall.</b> 11 Q Does that mean that you never saw him 12 stoned? Or you just don't recall one way or the 13 other? 14 <b>A I don't recall one way or another.</b> 15 Q Do you know who the Whitney is? 16 <b>A Amber's sister.</b> 17 Q Okay. Do you recall any time when 18 Mr. Depp seemed confused about something that had 19 occurred? 20 <b>A I don't.</b> 21 Q Did you ever recall Mr. Depp wondering 22 if he and Amber had a fight or if he was dreaming?	1290	1 Q Did you have any understanding that 2 Mr. Depp took cocaine whether you saw it or not? 3 <b>A I don't recall.</b> 4 Q Did you administer drug tests to 5 Mr. Depp? 6 <b>A In the beginning.</b> 7 Q Did you see the results of the drug 8 tests? 9 <b>A Yes.</b> 10 Q Did you see Mr. Depp being positive for 11 taking cocaine? 12 <b>A I don't recall.</b> 13 Q Do you recall accompanying Mr. Depp to 14 Australia? 15 <b>A Yes.</b> 16 Q In -- okay. And do you recall 17 accompanying Mr. Depp to Australia in around March 18 of 2015? 19 <b>A I don't remember dates.</b> 20 Q Do you recall accompanying Mr. Depp to 21 Australia when he was filming Pirates of the 22 Caribbean 5?



	1291		1293
<p>1 <b>A I do.</b></p> <p>2 Q Okay. Where were you staying in</p> <p>3 Australia in relation to Mr. Depp?</p> <p>4 <b>A Distance-wise?</b></p> <p>5 Q Yeah. How far away were you from him?</p> <p>6 <b>A About 30 minutes.</b></p> <p>7 Q Okay. Where was Mr. Depp staying?</p> <p>8 <b>A In a rental house.</b></p> <p>9 Q And where were you staying?</p> <p>10 <b>A In an apartment.</b></p> <p>11 Q And what city were you in?</p> <p>12 <b>A I don't recall the name.</b></p> <p>13 Q Okay. And was Dr. Kipper there with</p> <p>14 you?</p> <p>15 <b>A He came and went.</b></p> <p>16 Q Did you fly to Australia with Mr. Depp?</p> <p>17 <b>A Sometimes I did, and other times I flew</b></p> <p>18 <b>on a – commercial.</b></p> <p>19 Q Do you recall talking to Dr. Blaustein</p> <p>20 about Mr. Depp in Australia?</p> <p>21 <b>A I do not.</b></p> <p>22 Q Do you recall Mr. Depp not doing very</p>		<p>1 Q Okay.</p> <p>2 MR. NADELHAFT: We can take this down.</p> <p>3 And go back to Exhibit 1. And if we could, go to</p> <p>4 Kipper 157.</p> <p>5 Q Do you see 3/7/15?</p> <p>6 <b>A I do.</b></p> <p>7 Q Before I ask, do you recall how long</p> <p>8 you were in Australia with Mr. Depp?</p> <p>9 <b>A No. However long the filming of</b></p> <p>10 <b>Pirates was.</b></p> <p>11 Q Okay. And at 3/7/15 at 11:30, you</p> <p>12 wrote, "MD received a text message from client</p> <p>13 that he had been arguing with wife and that he had</p> <p>14 cut his finger. According to patient, his</p> <p>15 assistant and security were on their way to pick</p> <p>16 him up."</p> <p>17 You wrote that?</p> <p>18 <b>A According to my notes, yes.</b></p> <p>19 Q Is there any reason to believe that you</p> <p>20 didn't write that note?</p> <p>21 <b>A No.</b></p> <p>22 Q Okay. Do you recall Dr. Kipper</p>	
<p>1 well while he was in Australia as of March 1st,</p> <p>2 2015?</p> <p>3 <b>A I don't recall anything around that</b></p> <p>4 <b>time.</b></p> <p>5 Q Do you have an understanding as to what</p> <p>6 Mr. Depp was doing with Marilyn Manson?</p> <p>7 <b>A I do not.</b></p> <p>8 Q Did you ever tell Dr. Kipper that</p> <p>9 Mr. Depp was doing what he wants with Marilyn</p> <p>10 Manson?</p> <p>11 <b>A I don't recall.</b></p> <p>12 Q Do you recall Marilyn Manson being in</p> <p>13 Australia with Mr. Depp?</p> <p>14 <b>A I do not.</b></p> <p>15 Q It says, "Debbie is worried and</p> <p>16 somewhat exhausted."</p> <p>17 Do you recall being exhausted while in</p> <p>18 Australia and working with Mr. Depp?</p> <p>19 <b>A I do not.</b></p> <p>20 Q Do you have any reason to believe that</p> <p>21 what Dr. Kipper wrote is not true?</p> <p>22 <b>A I do not.</b></p>		<p>1 receiving a text message from Mr. Depp about</p> <p>2 Mr. Depp cutting his finger?</p> <p>3 <b>A I don't. I don't. Just what this note</b></p> <p>4 <b>says.</b></p> <p>5 Q Okay. Do you recall going to</p> <p>6 Mr. Depp's house after learning that he had cut</p> <p>7 his finger?</p> <p>8 <b>A Yes.</b></p> <p>9 Q What do you recall about that?</p> <p>10 <b>A That we went to the house and he --</b></p> <p>11 <b>actually, I don't even think I went in at first.</b></p> <p>12 <b>Dr. Kipper went in, and he had cut his finger and</b></p> <p>13 <b>we took him to the emergency room. Or his finger</b></p> <p>14 <b>had been cut.</b></p> <p>15 Q Do you recall what the house looked</p> <p>16 like when you went in?</p> <p>17 <b>A Yes.</b></p> <p>18 Q What did the house look like?</p> <p>19 <b>A It was a mess.</b></p> <p>20 Q Can you describe how it was a mess?</p> <p>21 <b>A I don't remember details, but I</b></p> <p>22 <b>remember there was some writing on the wall, and I</b></p>	

1295	<p>1 <b>remember a smashed TV.</b> 2 Q Do you remember what any of the writing 3 said on the wall? 4 <b>A I do not.</b> 5 Q And you said you recalled a smashed TV. 6 <b>A Yes.</b> 7 Q Do you recall was Amber in the house? 8 <b>A I don't recall.</b> 9 Q Do you recall seeing Amber that day? 10 <b>A No, I don't recall.</b> 11 Q Do you recall what rooms you went 12 through of the house, Mr. Depp's house? 13 <b>A I remember looking for his finger in</b> 14 <b>the downstairs area.</b> 15 Q And what was in the downstairs area? 16 Or what rooms were in the downstairs area? 17 <b>A It was, like, a pool</b> 18 <b>table/entertainment room.</b> 19 Q Did you look anywhere else around the 20 house? 21 <b>A I don't recall.</b> 22 Q What was -- the pool</p>	1297	<p>1 have dirt, grime, and paint on his hands? 2 <b>A Yes, he did.</b> 3 Q Do you recall seeing any glass 4 anywhere? 5 <b>A I do not.</b> 6 Q Do you recall smelling any alcohol? 7 <b>A I do not.</b> 8 Q And who else was with you when you went 9 to the hospital? 10 <b>A Malcolm and Stephen.</b> 11 Q And who are Malcolm and Stephen? 12 <b>A Stephen was his assistant, and Malcolm</b> 13 <b>was one of his security guards.</b> 14 Q Do you recall who was holding the piece 15 of finger that had been cut? 16 <b>A Ben brought it to the ER.</b> 17 Q What did Ben bring the finger in? 18 <b>A I don't recall.</b> 19 Q Was it on ice, the finger? 20 <b>A I don't recall.</b> 21 Q Did you ask Mr. Depp how he cut his 22 finger?</p>
1296	<p>1 table/entertainment room, was that a mess? 2 <b>A I don't recall.</b> 3 Q Do you recall going into the kitchen of 4 the house? 5 <b>A I don't recall.</b> 6 Q Do you recall finding Mr. Depp's 7 finger? 8 <b>A I did not.</b> 9 Q Do you know who found Mr. Depp's 10 finger? 11 <b>A Yes.</b> 12 Q Who? 13 <b>A Ben.</b> 14 Q Ben who? 15 <b>A I don't remember his last name.</b> 16 Q And who was Ben in relation to 17 Mr. Depp? 18 <b>A He was, like, our house manager.</b> 19 Q Do you recall where the finger was 20 found? 21 <b>A I do not.</b> 22 Q Do you recall if Mr. Depp appeared to</p>	1298	<p>1 <b>A I don't recall if I asked him.</b> 2 Q Did you ask anyone how Mr. Depp had cut 3 his finger? 4 <b>A I don't recall.</b> 5 Q Do you have any understanding as to how 6 Mr. Depp cut his finger? 7 <b>A I heard different stories from people.</b> 8 Q What were the different stories you 9 heard? 10 <b>A I had heard that Amber threw a bottle</b> 11 <b>of vodka at him. I had heard that he slammed it</b> 12 <b>with a phone.</b> 13 Q Do you recall who you heard that Amber 14 had thrown a bottle at him? 15 <b>A I do not.</b> 16 Q Do you recall who you heard that he 17 slammed it on a phone? 18 <b>A I do not.</b> 19 Q Those -- the stories that you had 20 heard, did you hear it on that day of March 7th, 21 or March 8th, 2015, or later? 22 <b>A I don't remember.</b></p>

1299	1 Q Did you ever talk with Mr. Depp about 2 how he cut his finger? 3 <b>A I don't recall conversations.</b> 4 Q Did you ever talk with Dr. Kipper about 5 how Mr. Depp cut his finger? 6 <b>A I don't recall specific conversations.</b> 7 Q Did Mr. Depp -- how long was Mr. Depp 8 in the hospital for? 9 <b>A I don't remember.</b> 10 Q Did you have any concerns about the 11 nurse supervision of Mr. Depp? 12 <b>A I know at times we would go days 13 without me seeing him, but I don't know 14 specifically what this is regarding.</b> 15 Q Were there issues with the nurse 16 supervision while in Australia? 17 <b>A I don't recall specifics.</b> 18 Q You have no recollection of Dr. Kipper 19 withdrawing his care of Mr. Depp for any period of 20 time? 21 <b>A No. I know at times it was discussed 22 when he would miss appointments, but I don't</b>	1301	1 kid... Even attempting saying thank you to you, 2 would be like a monkey trying to fuck a 3 football... It's just simply impossible. I wish 4 things could have ended on a better note... All 5 my love, Nurse Shark... JD." 6 Do you recall receiving this text from 7 Mr. Depp? 8 <b>A I don't.</b> 9 Q But this text was on your phone, 10 correct? 11 <b>A Correct.</b> 12 Q Would Mr. Depp call you "Nurse Shark"? 13 <b>A Yes.</b> 14 Q Would Mr. Depp call you "Little 15 Debbie"? 16 <b>A Yes.</b> 17 Q And you don't recall Mr. Depp saying 18 "Never heard of anyone being fired by their 19 physician before"? 20 <b>A I do not.</b> 21 Q And then you respond on the next page, 22 "I love you too and hope this is not the end. Be
1300	1 <b>recall him ever actually going through with 2 withdrawing his care.</b> 3 Q Okay. Do you recall there being 4 concerns about Mr. Depp taking substances that he 5 shouldn't have been taking? 6 <b>A I don't recall what that was regarding.</b> 7 Q Do you recall having major concerns 8 about leaving for Australia with Mr. Depp? 9 <b>A I do not.</b> 10 Q While that's going up, Ms. Lloyd, the 11 day that Mr. Depp cut his finger, you don't recall 12 seeing Amber one way or the other; is that right? 13 <b>A I do not.</b> 14 Q Exhibit 16 is LLOYD 140 through 145. 15 And Mr. Depp responded, "It's sad. I love you so 16 much, Little Debbie. And, of course, Kipper too. 17 He was right... Though, I did feel a bit of a 18 sting when his letter (paper trail) arrived, on 19 the off chance that I croak. Which, I also 20 understand. Just never heard of anyone being 21 fired by their physician before... So, I'm kinda 22 proud of that little fact, too. I love you,	1302	1 safe and be smart my son." 2 You sent that text to Mr. Depp? 3 <b>A According to this, yes.</b> 4 Q And do you know what you meant by "Be 5 safe and be smart"? 6 <b>A I don't know.</b> 7 Q And then Mr. Depp wrote, "I've been off 8 of for 3 days. The Doc jumped the gun... Also... 9 Please thank him for Motrin and the baclofen. 10 They work a treat for amputated fingers [sic]... 11 Goddamn... I love that weird fucker, no matter 12 what." 13 Did you receive that text from 14 Mr. Depp? 15 <b>A According to this.</b> 16 Q Do you understand what is meant by "I 17 have been off of for 3 days"? 18 <b>A I have no idea.</b> 19 Q You respond, "So glad to hear you have 20 been off. No matter what, I just want you to feel 21 better"? 22 <b>A Yeah. I don't know what we were</b>

<p>1303</p> <p>1 referring to. 2 Q If you go down to the next page, you 3 write "I'd be more than happy to come back and 4 help you with pain management and Toradol 5 injections. I know Kipper loves you and would 6 always want to continue your care if you're no 7 longer using." 8 You wrote that to Mr. Depp? 9 A According to this. 10 Q And this text was on your phone, 11 correct? 12 A Correct. 13 Q What did you mean by "Kipper loves you 14 and would always want to continue your care if 15 you're no longer using"? 16 A I don't know. Just what it says. 17 Q No longer using -- 18 A I don't know what that was regarding. 19 Q You don't know what "no longer using" 20 is referring to? 21 A I do not. 22 Q And then Mr. Depp wrote, "I don't</p>	<p>1305</p> <p>1 so much, Little Debbie... And so does my entire 2 crew. X." 3 You received that text message from 4 Mr. Depp? 5 A According to this, yes. I'm going to 6 cry. 7 Q Ms. Lloyd, I'm showing you what's been 8 marked as Exhibit Lloyd 17, which is LLOYD 158 9 through 160, which is a text message between you 10 and Johnny Depp from your phone. Do you see that? 11 A Yes. 12 Q Okay. And on March 27th, 2015, you 13 wrote, "Good morning sleepy head. Erin came by to 14 give you a shot but you were still sleeping. Take 15 the pill form of Toradol to hold over and I will 16 check in with you when I've done my appointment at 17 Beverly hills." 18 And then you wrote, "Have you taken 19 pill? If not, hold off and Erin is on her way to 20 give you injection." 21 Do you see that? 22 A Yes.</p>
<p>1304</p> <p>1 know... I'm going the stop it all, except, 2 whatever I was on before and just deal with it." 3 You received that text from Mr. Depp? 4 A Yes. 5 Q Do you know what he was referring to 6 where he said "I'm going to stop it all, except, 7 whatever I was on before and just deal with it"? 8 A I do not know what's that regarding. 9 Q Okay. And then you wrote, "I respect 10 whatever decisions you make. I'll be sad to leave 11 the crew as I love you all. I hope to always be 12 in touch even if you choose not to continue a 13 working relationship. Miss you already. I will 14 get in touch with Kevin and get my stuff out or 15 [sic] 72 soon. Hugs." 16 You wrote that message to Mr. Depp? 17 A According to this. 18 Q And Mr. Depp wrote, "Take care, 19 Darlin'... I cannot ever thank you enough all you 20 done for me... On the junky side and broken heart 21 side. You've been a lifesaver... Literally. 22 We'll see each other again, sweetheart. Love you</p>	<p>1306</p> <p>1 Q Okay. And you wrote that text message, 2 correct, or those messages? 3 A Yes. 4 Q And then on the next page, Mr. Depp 5 wrote, "The fucking pain is as bad as when it was 6 cut off. Horrific." 7 You received that message from 8 Mr. Depp? 9 A Yes. 10 Q And he's talking about his finger 11 there, correct? 12 A Yes. 13 Q And you received that text message from 14 Amber, correct? 15 A Correct. 16 Q Right. And then you wrote, "He's at 17 the studio with Marcus and is supposed to call me 18 when he gets back to the lofts. I will drive up 19 there if you want me to. Always feel weird 20 showing up unexpected. Do you want me to go?" 21 You wrote that text message to Amber? 22 A I don't recall, but according to this,</p>

1307	<p>1 <b>yes.</b></p> <p>2 Q And do you know who Marcus is?</p> <p>3 <b>A Yes.</b></p> <p>4 Q Who is Marcus?</p> <p>5 <b>A Marcus Mumford.</b></p> <p>6 Q And what was his relationship to</p> <p>7 Mr. Depp?</p> <p>8 <b>A Friend.</b></p> <p>9 Q And then you wrote, "I know Stephen is</p> <p>10 there. Let me just check in and see what I can</p> <p>11 find out. I'll get right back to you."</p> <p>12 Who is Stephen?</p> <p>13 <b>A His assistant.</b></p> <p>14 Q All right. Do you ever remember</p> <p>15 checking if Mr. Depp had been taking cocaine?</p> <p>16 <b>A I don't remember specifically asking</b></p> <p>17 <b>any questions related to that.</b></p> <p>18 Q Is there any reason to believe that you</p> <p>19 didn't do what you said in your text message?</p> <p>20 <b>A No.</b></p> <p>21 Q Do you recall what you were giving</p> <p>22 Mr. Depp Valium for?</p>	1309	<p>1 <b>A Yes.</b></p> <p>2 Q And Mr. Depp told you that he felt the</p> <p>3 majority of his issues with his wife had been from</p> <p>4 him using drugs and alcohol?</p> <p>5 <b>A According to the note, yes.</b></p> <p>6 Q And Mr. Depp wrote, "he will no longer</p> <p>7 sneak/use, and wants to enjoy clarity"?</p> <p>8 <b>A According to the document, yes.</b></p> <p>9 Q What is being referred to as "no longer</p> <p>10 sneak/use"?</p> <p>11 <b>A I only know what's stated in my notes.</b></p> <p>12 Q Okay. Would it be anything other than</p> <p>13 drugs or alcohol?</p> <p>14 <b>A I don't recall.</b></p> <p>15 Q Was there anything that Mr. Depp was</p> <p>16 sneaking other than drugs and alcohol that you</p> <p>17 were concerned about?</p> <p>18 <b>A I don't recall.</b></p> <p>19 Q If we go to 175, Kipper 175 on this</p> <p>20 page -- on this document, it's notes for</p> <p>21 June 28th, 2015.</p> <p>22 <b>A June... Okay.</b></p>
1308	<p>1 <b>A I do not.</b></p> <p>2 Q Ms. Lloyd, showing you again what's</p> <p>3 been marked as Exhibit 1, and I'm going to point</p> <p>4 you to Kipper 167, which is from April 13th, 2015.</p> <p>5 <b>A Okay.</b></p> <p>6 Q Okay. Do you see the entry for 15:00?</p> <p>7 <b>A Yes.</b></p> <p>8 Q All right. You wrote, "Bandage changed</p> <p>9 and hand exercises done at appointment with</p> <p>10 surgeon's office. Per RN at surgeon's office and</p> <p>11 occupational therapist, hand his healing well and</p> <p>12 finger has good range of motion. Exercises to be</p> <p>13 done 3-5 times per day. Patient is in good</p> <p>14 spirits and says he's not smoked marijuana in 3</p> <p>15 days. States he feels majority of his issues with</p> <p>16 his wife have been from him using drugs and</p> <p>17 alcohol. Patient states he will no longer</p> <p>18 sneak/use and wants to enjoy clarity."</p> <p>19 You wrote that?</p> <p>20 <b>A Yes.</b></p> <p>21 Q And these are part of your nurse's</p> <p>22 notes?</p>	1310	<p>1 Q It talks -- it says 17:00, "RN received</p> <p>2 initial results from brain MRI. No obvious</p> <p>3 abnormalities noted. Final report will be done</p> <p>4 tomorrow. Patient informed of results."</p> <p>5 Do you recall why Mr. Depp received the</p> <p>6 brain MRI?</p> <p>7 <b>A He was having chronic headaches.</b></p> <p>8 Q And then you see at 6/30 at 13:00?</p> <p>9 <b>A Yes.</b></p> <p>10 Q And that's highlighted?</p> <p>11 <b>A Yeah.</b></p> <p>12 Q Okay. You wrote, "RN arrived on set to</p> <p>13 visit patient. He was upset due to having an</p> <p>14 argument with his wife. Patient stated he had</p> <p>15 taken 'about 4' Xanax 1 milligram over the past 24</p> <p>16 hours to deal with with the stress he was feeling.</p> <p>17 Patient was able to express his emotions</p> <p>18 appropriately. Patient stated that he had not</p> <p>19 slept the night before due to argument with his</p> <p>20 wife."</p> <p>21 That's a note you wrote?</p> <p>22 <b>A Correct.</b></p>

1311	1 Q That's based off of information 2 provided to you by Mr. Depp? 3 A I don't recall. 4 Q Well, we're -- 5 A According to my note, yes. 6 Q So Mr. Depp told you he had taken about 7 four Xanax 1 milligram over the past 24 hours, 8 correct? 9 A It's in my notes, yes. 10 Q And at 19:20 on June 30th, it says, 11 "Patient had another argument with his wife. 12 Patient was anxious and asking for medication to 13 help calm him down. Seroquel 50 milligrams 14 administered." 15 Do you see that? 16 A Yes. 17 Q And that's a note you wrote? 18 A Yes. 19 Q Do you know why your nursing notes 20 ended on June 1st -- July 1st, 2015? 21 A I do not. 22 Q How -- did you continue to care for	1313	1 treated for a bad crush injury for his finger? 2 A I recall him being treated for a finger 3 injury. I didn't realize -- this is the first I 4 remember hearing it was a crush injury. 5 Q And that's the email you received from 6 Dr. Kulber, correct? 7 A I'm seeing this today. I don't recall 8 receiving this email. 9 Q Is there any reason you believe you 10 didn't receive this email? 11 A No. I just don't recall. 12 Q Okay. Ms. Lloyd, I'm showing you 13 what's been marked as Exhibit 20, which is a text 14 message chain between you and Mr. Depp from your 15 phone. 16 Do you see that? 17 A I see that. 18 Q On July 5th, 2015, Mr. Depp wrote to 19 you, "Canceling the squeezing and needles tonight. 20 Need to get the recluse out of his cage and his 21 brain." 22 You received that text message from
1312	1 Mr. Depp as his nurse after July 1st, 2015? 2 A I do not recall my last date. 3 Q Okay. Did you prepare nursing notes 4 through the time that you were Mr. Depp's nurse? 5 A I did. 6 Q Okay. And did you provide those notes 7 to Dr. Kipper? 8 A I did. 9 Q Ms. Lloyd, I'm showing you what's been 10 marked as Exhibit Lloyd 19. This is an email from 11 Dr. David Kulber on June 27th, 2015, that you were 12 copied on. 13 Do you see that? 14 A Yes. 15 Q And do you know who Dr. Kulber is. 16 A I don't recall exactly who he was. 17 Q Did you understand that Mr. Depp went 18 to a specialist for his finger? 19 A Yes. 20 Q Okay. And you're copied on this email? 21 A I see my name copied on the email, yes. 22 Q Okay. And you recall that Mr. Depp was	1314	1 Mr. Depp? 2 A Yes. 3 Q Okay. And then you said, "How come 4 you're canceling? You okay? Not sure what you 5 mean by the rest of your text. Please let me know 6 if you need anything. I'm here if you want to 7 chat or want me to go hang at the house with you." 8 You wrote that text to Mr. Depp? 9 A Yes. 10 Q And then Mr. Depp wrote to you, "I'm in 11 a very anxious and painfully confused state... 12 Rather not get into details... But, in a 13 nutshell... Problems with family, my company, the 14 Ex, business manager and my fuckin' jumbled 15 brain... Will need refills of meds tomorrow... 16 Thanks, honey. X." 17 You received that text from Mr. Depp? 18 A According to this, yes. 19 Q And Mr. Depp talked about how he was 20 having problems with his family? 21 A That's what this states. 22 Q And Mr. Depp was having problems with

<p>1 his company? 1315</p> <p>2 <b>A That's what this states.</b></p> <p>3 Q And Mr. Depp was having problems with</p> <p>4 the ex?</p> <p>5 <b>A That's what this states.</b></p> <p>6 Q And Mr. Depp was having problems with</p> <p>7 his business manager?</p> <p>8 <b>A According to this text.</b></p> <p>9 Q And Mr. Depp was having trouble with</p> <p>10 his "fuckin' jumbled brain," correct?</p> <p>11 <b>A According to this text.</b></p> <p>12 Q Just going back to Exhibit 1 for a</p> <p>13 moment, if we go to back to Kipper 167, and,</p> <p>14 Ms. Lloyd, I'd ask you to look at the entries for</p> <p>15 April 14th. It's at the bottom.</p> <p>16 <b>A Okay.</b></p> <p>17 Q You wrote at 14:00, "RN and MD arrive</p> <p>18 at patient's home to have meeting to set treatment</p> <p>19 plan and boundaries while traveling in Australia."</p> <p>20 You wrote that?</p> <p>21 <b>A Correct.</b></p> <p>22 Q And the "RN" is you, correct?</p>	<p>1317</p> <p>1 property and informed MD of the events. Per MD</p> <p>2 dropp tomorrow's meds off with security and do not</p> <p>3 reach out to the patient again - wait for patient</p> <p>4 to reach out to medical team."</p> <p>5 You wrote that note?</p> <p>6 <b>A Correct.</b></p> <p>7 Q This document and this note also talks</p> <p>8 about you informing Dr. Kipper about what happened</p> <p>9 that -- in this note, correct?</p> <p>10 <b>A Yes.</b></p> <p>11 Q Ms. Lloyd, I'm showing you what's been</p> <p>12 marked as Lloyd 21. Do you see on April 15th at</p> <p>13 the bottom, there's a text from Mr. Depp?</p> <p>14 <b>A Yes.</b></p> <p>15 Q And he wrote, "Hey, sweetheart... I'm</p> <p>16 so sorry about today... I thought you were</p> <p>17 Stephen, whom I'm not particularly enthused about</p> <p>18 for his loss of loyalty and his loss of memory...</p> <p>19 He has tried everything to fuck me over, as far as</p> <p>20 traveling with my wife. He also bursts into my</p> <p>21 fucking house like it's goddamn Grand Central</p> <p>22 Station. I'm truly sorry if I upset you. If you</p>
<p>1316</p> <p>1 <b>A Yes.</b></p> <p>2 Q And the "MD" is Dr. Kipper, correct?</p> <p>3 <b>A Correct.</b></p> <p>4 Q And do you recall what the treatment</p> <p>5 plans and boundaries were while traveling in</p> <p>6 Australia as of April 2015?</p> <p>7 <b>A I do not recall.</b></p> <p>8 Q And then if we go to the next page, do</p> <p>9 you see the April 15th entries?</p> <p>10 <b>A Yes.</b></p> <p>11 Q Okay. And at 12:15 you write, "Arrived</p> <p>12 at patient's home. Assistant was in hallway and</p> <p>13 informed RN that patient was in a bad mood and</p> <p>14 told assistant he did not need anything from him</p> <p>15 today. RN was let in home by security and knocked</p> <p>16 on patient's door to let him know she was there.</p> <p>17 Patient screamed 'what.' RN informed patient she</p> <p>18 was letting him know she was there and would be</p> <p>19 downstairs. About 5 minutes later security came</p> <p>20 in the house and informed RN that patient has told</p> <p>21 security to get everyone out of his home and he</p> <p>22 did not want any more unexpected guests. RN left</p>	<p>1318</p> <p>1 like, you can give me some morphine to see if my</p> <p>2 tongue and penis touch. All my love. J."</p> <p>3 Did you receive this text from</p> <p>4 Mr. Depp?</p> <p>5 <b>A It appears so. I don't -- yes.</b></p> <p>6 Q Okay. Did you have any understanding</p> <p>7 as to what Mr. Depp was referring to where he says</p> <p>8 "Stephen tried everything to fuck me over, as far</p> <p>9 as traveling with my wife"?</p> <p>10 <b>A I do not --</b></p> <p>11 <b>EXAMINATION BY COUNSEL FOR THE PLAINTIFF AND</b></p> <p>12 <b>COUNIERCLAIM DEFENDANT</b></p> <p>13 <b>BY MS. MEYERS:</b></p> <p>14 Q First of all, going back to your work</p> <p>15 for Dr. Kipper, I think you said earlier you cared</p> <p>16 for multiple patients that were of Dr. Kipper's</p> <p>17 correct?</p> <p>18 <b>A Correct.</b></p> <p>19 Q And when you would care for</p> <p>20 Dr. Kipper's patients, how would you report their</p> <p>21 status to Dr. Kipper?</p> <p>22 MR. NADELHAFT: Objection. Vague.</p>

1319	<p>1 <b>A Multiple different resources: Phones,</b> 2 <b>texts, verbal – verbal and written.</b> 3 Q And how often would you report to 4 Dr. Kipper about his patients? 5 <b>A Responded – I mean, it depended on</b> 6 <b>different patients. It varied.</b> 7 Q And I believe you testified earlier 8 that you maintained nursing notes for those 9 patients, correct? 10 <b>A Correct.</b> 11 Q What type of information did you 12 maintain in these notes? 13 <b>A Mainly we provide care given and</b> 14 <b>patient's responses to care given or any external</b> 15 <b>factors that could affect the patient.</b> 16 Q Is there any information that you would 17 not include in your notes? 18 <b>A Not –</b> 19 Q I'm sorry; I didn't catch your answer. 20 <b>A Not specifically.</b> 21 Q Other than Dr. Kipper, does anyone else 22 review your notes?</p>	1321	<p>1 <b>A Yes.</b> 2 Q And what is that responsibility? 3 <b>A I'm a mandated reporter for child/elder</b> 4 <b>abuse and any suspected injuries.</b> 5 Q How would you define "suspected 6 injuries"? 7 <b>A If I was to work in a facility and</b> 8 <b>somebody came in and reported or if I felt it was</b> 9 <b>an injury caused by somebody else.</b> 10 Q Who do you report abuse to in that 11 instance? 12 <b>A I've never had to report abuse.</b> 13 Q Okay. But given your professional 14 responsibility, do you know who you would report 15 that to in that event? 16 <b>A I do not.</b> 17 Q In your time as a registered nurse, 18 have you ever witnessed physical violence by one 19 of your patients? 20 <b>A I do not recall ever witnessing any</b> 21 <b>violence.</b> 22 Q And when you say "any violence," does</p>
1320	<p>1 <b>A If another nurse was to work on the</b> 2 <b>case, they could have access to the notes.</b> 3 Q And does Dr. Kipper advise you on any 4 information that should be maintained in your 5 notes? 6 <b>A Not directly.</b> 7 Q Has he ever told you that certain 8 information should not be included in your notes? 9 <b>A No.</b> 10 Q How long have -- when did you become a 11 registered nurse? 12 <b>A 2004.</b> 13 Q And have you been employed as a 14 registered nurse from that time up until you 15 became a nurse practitioner? 16 <b>A Yes.</b> 17 Q In your time as a registered nurse, 18 have you ever had a patient that you suspected was 19 the victim of domestic abuse? 20 <b>A No.</b> 21 Q Do you have any professional 22 responsibility to report domestic abuse?</p>	1322	<p>1 that mean perpetrated by your patient or against 2 your patient or just -- 3 <b>A Just in general, violence.</b> 4 Q So you met Mr. Depp either on June 11th 5 or June 12th of 2014? 6 <b>A According to my notes, yes.</b> 7 Q Okay. Had you ever spoken with him 8 before that date? 9 <b>A No.</b> 10 Q When did you first meet Ms. Heard? 11 <b>A I don't recall.</b> 12 Q Do you recall when you first met -- not 13 specifically written, but do you recall the 14 instance when you first met her? 15 <b>A I do not.</b> 16 Q When you first met Ms. Heard, did you 17 have an understanding as to what her relationship 18 to Mr. Depp was at that time? 19 <b>A Yes.</b> 20 Q And what was that understanding? 21 <b>A That they were in a relationship.</b> 22 Q Were they engaged when you first met</p>



1323	1 them? 2 <b>A I don't recall the date they got</b> 3 <b>engaged.</b> 4 Q Were they married when you first met 5 them? 6 <b>A No.</b> 7 Q Did you attend their wedding? 8 <b>A Yes.</b> 9 Q And where was that? 10 <b>A On the island in the Bahamas.</b> 11 MS. MEYERS: Can we take this down and 12 please pull up what I've marked as document B. 13 AV TECHNICIAN: Exhibit 23. 14 Q Now, just for the record, I believe 15 these are the nursing notes you were looking at 16 earlier. This just has a different production 17 number, and I just thought it might go more 18 smoothly if I am calling out the correct page 19 numbers. 20 So just to establish this, do you 21 recognize this document here? 22 <b>A Yes.</b>	1325	1 Q Does this refresh your recollection 2 that Mr. Depp and Ms. Heard were engaged in June 3 of 2014? 4 <b>A According to this, yes.</b> 5 Q Okay. Is this the first time you met 6 Ms. Heard? 7 <b>A I don't recall when I met her.</b> 8 Q Further down in the note, do you see 9 where it says, "Assistant was also asked to pass 10 RN and MD's numbers to fiancé as we would both 11 like to speak with her and to obtain her input 12 toward patient treatment needs"? 13 Do you see where I'm referring to? 14 <b>A Yep.</b> 15 Q Okay. "RN" is referring to you in this 16 instance? 17 <b>A Correct.</b> 18 Q And "MD" refers to Dr. Kipper? 19 <b>A Correct.</b> 20 Q Do you recall why you wanted to speak 21 with Ms. Heard at this time? 22 <b>A I do not.</b>
1324	1 Q And these are your nursing notes that I 2 believe you looked at with Mr. Nadelhaft earlier, 3 correct? 4 <b>A Correct.</b> 5 Q Okay. I'd like to direct your 6 attention to the entry for June 17th of 2014, 7 which is on the page with -- perfect. There it 8 is. This is a note you prepared, correct? 9 <b>A Correct.</b> 10 Q And at the time that you prepared this 11 note, were you in Boston with Mr. Depp? 12 <b>A According to the note, yes.</b> 13 Q Now, in the section that says 2 -- 14 "23:30," do you see where it says, "Accompanied 15 patient, fiancé, assistants and security to 16 concert"? 17 <b>A Yes.</b> 18 Q And in this note, "patient" refers to 19 Mr. Depp; is that right? 20 <b>A Yes.</b> 21 Q And "fiancé" is Ms. Heard? 22 <b>A Yes.</b>	1326	1 Q Do you recall Ms. Heard expressing 2 interest in participating in Mr. Depp's treatment? 3 <b>A I don't remember the events other than</b> 4 <b>what's stated in my notes.</b> 5 Q Your phone number was given to 6 Ms. Heard, though, correct? 7 <b>A Correct.</b> 8 AV TECHNICIAN: Exhibit 24. 9 Q Ms. Lloyd, do you recognize this 10 document? 11 <b>A No.</b> 12 Q So I take it you did not prepare this 13 document; is that correct? 14 <b>A Correct.</b> 15 Q Directing your attention to the bottom 16 of the page -- 17 THE COURT: Ladies and gentlemen, 18 that's probably a good break to have a lunch 19 break, so we'll go ahead and break until 2:00. Do 20 not discuss the case with anybody, and don't do 21 any outside research, okay? We'll come back and 22 continue this deposition.

Transcript of Jury Trial - Day 5  
Conducted on April 18, 2022

41 (1327 to  
1330)

1327	1 (Whereupon, the jury exited the 2 courtroom and the following proceedings took 3 place.) 4 THE COURT: All right. So we'll return 5 at 2:00 p.m., correct? 6 MR. CHEW: Yes, Your Honor. 7 THE COURT: Okay. Thank you. 8 THE BAILIFF: All rise. 9 (Recess taken from 1:00 p.m. to 10 2:01 p.m.) 11 THE BAILIFF: All rise. Please be 12 seated and come to order. 13 THE COURT: Before we bring the jury 14 in, if I could have counsel approach for a moment. 15 (Sidebar) 16 THE COURT: Juror 25, who happens to be 17 the one waving, the deputies, at lunchtime, said 18 he had hernia surgery about two months ago and 19 he's in a lot of pain. He doesn't feel 20 comfortable sitting here. I'm not sure if that's 21 just today or if that's in general. But I was -- 22 MS. BREDEHOFT: I'm happy to excuse	1329	1 Sir, I know you let the deputy know 2 you're not feeling well from a surgery that you 3 had. 4 Hold on just a minute. I really can't 5 hear you. 6 JUROR NUMBER 25: I had hernia problem. 7 That's why it start being -- 8 THE COURT: You have a problem with a 9 hernia? 10 JUROR NUMBER 25: Yeah. 11 THE COURT: It's really bothering you 12 to the point where you can't concentrate? 13 JUROR NUMBER 25: Yeah. Today, I don't 14 know why it's bothering me too much. 15 THE COURT: I want to make sure you 16 understand, if I excuse you today, I'm excusing 17 you from the jury. 18 JUROR NUMBER 25: I try to go home, get 19 medicine, get rested, be ready for tomorrow. 20 THE COURT: I can't do that. I can't 21 have that done. We have to keep going. 22 Has it been bothering you other days
1328	1 him. 2 THE COURT: I know you are. I think I 3 can bring him out here so we can talk with him and 4 see. If I excuse him today, he's excused for the 5 jury. He has to know that. But would you want me 6 to bring him out so you could talk to him? 7 MR. CHEW: So we wouldn't want to 8 dismiss him immediately. I mean, I just had 9 hernia surgery myself, several months ago. I 10 don't have any problems at all, but I know 11 everybody's different. 12 THE COURT: I can bring him out 13 individually. I'll have 25 come out so we can 14 talk to him for a minute. 15 Is that okay? 16 MS. BREDEHOFT: Yes. Thank you, Your 17 Honor. 18 THE COURT: We'll just bring him in. 19 (Open court.) 20 THE COURT: Can we get 25. 21 Sir, you can have a seat. That's fine. 22 Maybe if you can just talk real loud for me.	1330	1 while you've been on the jury? 2 JUROR NUMBER 25: No, today, start now. 3 Never bother me for the one to weeks I'm here. 4 THE COURT: But it might bother you, 5 also, tomorrow? 6 JUROR NUMBER 25: I'm not sure. I'm 7 trying to do my best. 8 THE COURT: I know you're trying to do 9 your best. I want to make sure you're healthy 10 too. I don't want you to ruin your health for 11 this. Just sit there for a second. If I could 12 have the attorneys. 13 Do you have any follow-up questions? 14 (Sidebar.) 15 MR. CHEW: Did he have surgery? 16 THE COURT: Sounds like he just has 17 hernia problems that bother him one to two weeks a 18 year. That's what I got from that. 19 MR. CHEW: If it was surgery, it would 20 probably get better. 21 THE COURT: I'm just afraid tomorrow 22 he's going to call in or something or he's not

1331	<p>1 focusing on the testimony today. 2 MS. BREDEHOFT: Today. He's already 3 saying that today. So, I move to excuse him. 4 THE COURT: There's not much you can -- 5 I know. 6 FEMALE SPEAKER: It's early on. 7 There's not much we can do. 8 Would you like us to ask him if he's 9 able to concentrate? 10 THE COURT: He says that he's pretty 11 pained. I think we just have to cut our losses 12 here on this. 13 MR. CHEW: If it's incarcerated -- 14 THE COURT: He needs to go to the 15 doctor, get it checked out. I think it might be 16 worse than he thinks it is. He's not one of our 17 alternates but what we can do is, at some point, 18 we'll take one of the names out of the alternate 19 bag and I'll tell you what the name is and that 20 person will be back on the jury. 21 MS. BREDEHOFT: Okay. So the 22 alternates are not in the order we picked them?</p>	1333	<p>1 I did have one question, you can stay 2 there, we don't have the jury. There seems to be 3 a few exhibits I just wanted to make sure of. You 4 gave us, we have everything that you just gave us 5 earlier from Dr. Kipper's deposition, but I just 6 want to make sure if there are redactions needed 7 for 395 or 414 or am I using mine for that? 8 MR. NADELHAFT: Bear with me, Your 9 Honor. 10 THE COURT: I just want to see. I can 11 just give you the numbers of the ones I'm not sure 12 about. You can look at it so we can move on. 13 405, 455, 304, 307, 395, and 414. 14 Just not sure if those -- I'm waiting 15 for redactions or if I'm using the ones I'm going 16 to use. 17 Then you had one that I'm not sure if 18 you said 1083 or 283. So if you could let me 19 know. I heard 1083 as the exhibit number. Jamie 20 heard 283. So I just want to make sure we get the 21 right one. That was with Dr. Kipper's. You said 22 1063 then you said either 1083 or 283. I'm not</p>
1332	<p>1 THE COURT: They're in an envelope 2 together. 3 MS. BREDEHOFT: Oh, okay. I thought 4 the order in which -- 5 THE COURT: We could do it that way, if 6 you want to. Rather do it that way? You can 7 decide tonight. I'll keep them all in the 8 envelope. 9 (Open court.) 10 THE COURT: All right. 11 Sir, we want to make sure you're 12 healthy. We're going to excuse you from this 13 jury, okay? Just take care of yourself, okay? 14 JUROR NUMBER 25: Okay. 15 THE COURT: Okay. Thank you. You can 16 go back. Thank you. 17 Yes, ma'am, do you have something 18 before the jury comes in? 19 MS. LECAROZ: Exhibit 548, Your Honor. 20 THE COURT: Which one? 21 MS. LECAROZ: 548. 22 THE COURT: Okay. 548 is done.</p>	1334	<p>1 sure which. 2 You can get back to me on it, 3 Mr. Nadelhaft. I don't want to catch you off 4 guard. 5 MR. NADELHAFT: I do have the redacted 6 versions of 304, 455, 405 -- 7 THE COURT: There you go. 8 MR. NADELHAFT: I think probably 283. 9 I have 283. 10 THE COURT: 283. Jamie's always right. 11 That's good. Good to know. If you want to hand 12 those up, that would be fantastic. 13 Is there anything else before the jury 14 comes? 15 MS. MEYERS: Your Honor, just for the 16 record, Plaintiff's Exhibit 47, Plaintiff's 17 Exhibit 48, and Plaintiff's Exhibit 41 were also 18 used and offered during Kipper, but -- 19 Dr. Kipper's deposition, I believe, I passed the 20 redacted versions of those up to you. 21 THE COURT: Yes, we have all of those. 22 MS. MEYERS: Okay.</p>

1335	1 THE COURT: Thank you. I think that 2 should be everything. If not, we'll get back with 3 you. Thank you. I know where to find you. 4 All right. Are we ready for the jury 5 then? 6 All right. Thank you. 7 (Whereupon, the jury entered the 8 courtroom and the following proceedings took 9 place.) 10 THE COURT: Thank you, ladies and 11 gentlemen. Just to let you know, Juror 25 was 12 experiencing some health issues and, obviously, 13 your health is a top priority for us, so I went 14 ahead and excused him from the jury. That's why 15 we have alternates, okay? 16 All right. Thank you. 17 All right. We can continue with 18 Ms. Lloyd's testimony. 19 BY MS. MEYERS: 20 Q Where it says this protracted therapy 21 will include 12-step private counseling, personal 22 psychotherapy and couples therapy with his	1337	1 MR. NADELHAFT: 23. 2 MS. MEYERS: 23, okay. Can you please 3 go to the entry for June 24th, 2014, which is on 4 DEPP 1661. 5 Q Okay. Now, with respect to the entry 6 for June 24th, 2014, this is a note -- this is an 7 entry you prepared, correct? 8 A Correct. 9 Q And the first line says "RN and MD met 10 with patient's fiancée to inform her of treatment 11 plan for patient." 12 Do you see that? 13 A I do. 14 Q Does this refresh your recollection 15 that you attended a meeting with Dr. Kipper and 16 Ms. Heard concerning Mr. Depp's treatment? 17 A I don't recall the meeting. 18 Q Do you have any reason to doubt that 19 this meeting occurred? 20 A No. 21 Q Do you have any -- other than what's 22 reflected in this note, do you have any other
1336	1 fiancée, Amber. Both are in agreement to this 2 plan. 3 Do you see where I'm referring? 4 A Yes. 5 Q Do you recall that couples therapy was 6 a component of Mr. Depp's treatment? 7 A I don't recall what was set between him 8 and the doctor. 9 Q Do you recall Mr. Depp and Ms. Heard 10 attending couples therapy together? 11 A Yes. 12 Q If we can turn to the next page here. 13 And then at the top, it says "I met with Amber for 14 90 minutes and discussed the above and her 15 concerns that he be strictly monitored and 16 supervised." 17 Do you recall Dr. Kipper meeting with 18 Amber early on in Mr. Depp's treatment? 19 A I do not. 20 MS. MEYERS: If we could bring back up 21 document B, which is now marked as Exhibit 22; is 22 that correct?	1338	1 independent recollection of any such meeting with 2 Dr. Kipper and Ms. Heard? 3 A I do not. 4 Q Okay. If I could direct your attention 5 just to the last line of the note, it says here 6 "She was encouraged to call RN or MD with any 7 questions or concerns that might arise." 8 Do you see that? 9 A I do. 10 Q Throughout your treatment of Mr. Depp, 11 did Ms. Heard reach out to you with questions and 12 concerns? 13 A Yes. 14 Q She had your phone number, correct? 15 A Yes. 16 Q And I think we saw some text messages, 17 that Mr. Nadelhaft was asking you questions, where 18 Ms. Heard was reaching out to you, correct? 19 A Correct. 20 Q When Mr. Depp became your patient, did 21 Ms. Heard ever show you any pictures of Mr. Depp? 22 A I don't recall.

1339	1341
<p>1 Q Do you recall Ms. Heard showing you any 2 pictures of cocaine? 3 <b>A I don't recall.</b> 4 Q Do you recall Ms. Heard ever showing 5 you any audio recordings of Mr. Depp? 6 <b>A I don't recall.</b> 7 Q Okay. I'd like to move on to the -- 8 Mr. Depp's detox. 9 And that was on his private island, 10 correct? 11 <b>A Correct.</b> 12 Q And you traveled down to the island 13 with Mr. Depp; is that right? 14 <b>A I don't recall. I'd have to -- it</b> 15 <b>should be in my notes.</b> 16 Q We can look at those in a moment. 17 But you were on the island with 18 Mr. Depp for the majority -- 19 <b>A Correct.</b> 20 Q -- of his detox, correct? 21 <b>A Yes.</b> 22 Q And when you were on the island, did</p>	<p>1 location reflected in that video? 2 <b>A Yes.</b> 3 Q What was it? 4 <b>A It's Johnny's home on his island.</b> 5 Q Is that where he was staying during the 6 detox process? 7 <b>A Yes.</b> 8 Q Is that video consistent with how the 9 house looked in August of 2014? 10 <b>A Yes.</b> 11 Q Is there any part of the house that's 12 not reflected in that video? 13 <b>A The bathroom wasn't in the video.</b> 14 Q When you were on the island, you were 15 personally overseeing Mr. Depp's detox process, 16 correct? 17 <b>A Correct.</b> 18 Q And how often would you see him in 19 person during that time? 20 MR. NADELHAFT: Objection. Asked and 21 answered. 22 <b>A It varied.</b></p>
1340	1342
<p>1 you see where Mr. Depp was staying? 2 <b>A Yes.</b> 3 Q And was Ms. Heard staying with him in 4 that location as well? 5 <b>A Yes.</b> 6 Q And what did their accommodations look 7 like? 8 <b>A Can you be more specific?</b> 9 Q What type of structure were they 10 staying in? 11 <b>A It was a house.</b> 12 MS. MEYERS: Can we pull up document E, 13 which was a video. 14 AV TECHNICIAN: Please stand by. 15 MS. MEYERS: And for the record, this 16 was produced as DEPP 9811. 17 AV TECHNICIAN: Showing Exhibit 25. 18 Let me know when you need me to play, Counsel. 19 MS. MEYERS: Please play. Thank you. 20 (Whereupon, an audio recording was 21 played.) 22 Q Ms. Lloyd, do you recognize the</p>	<p>1 Q Did you see him in person at least once 2 a day? 3 <b>A I cannot recall.</b> 4 Q When Dr. Kipper arrived, do you recall 5 how often he would see Mr. Depp? 6 <b>A I do not.</b> 7 Q What substances was Mr. Depp -- excuse 8 me. What substances was Mr. Depp detoxing from? 9 <b>A Opiates.</b> 10 Q Was he detoxing from any other 11 substances? 12 <b>A Not on the -- I don't recall.</b> 13 Q Have you overseen other patients 14 detoxing from opiates, before you were caring for 15 Mr. Depp? 16 <b>A Yes.</b> 17 Q How many, would you estimate? 18 <b>A Hundreds.</b> 19 Q What does that process do to the 20 person, physically? 21 <b>A They go through withdrawal symptoms and</b> 22 <b>we medicate them.</b></p>

1343	1 Q And what type of withdrawal symptoms 2 have you observed? 3 A Nausea, vomiting, body aches, 4 piloerection, rhinorrhea, restlessness, anxiety. 5 Q Is there a time during the detox 6 process when those symptoms are typically the most 7 acute? 8 MR. NADELHAFT: Objection. 9 A Yeah. 10 Q What stage in the process is that? 11 A Typically day three through five or 12 six. 13 Q How could you describe Mr. Depp's 14 physical state throughout the detox process? 15 A I don't recall specifics. I'd have to 16 refer to my notes. 17 Q How would you describe Mr. Depp's 18 psychological state throughout the detox process? 19 A I don't recall. I'd have to review my 20 notes. 21 Q All right. Let's go back to your 22 notes, then, which I believe is Exhibit 23.	1345	1 reflects that Mr. Depp was experiencing discomfort 2 on this date? 3 A According to my notes, yes. 4 Q It says he was experiencing muscle 5 spasm, chills, and pains, right? 6 A Correct. 7 Q Did you personally observe Mr. Depp in 8 this state? 9 A According to this note, it does not 10 appear I did. 11 Q Okay. Are these symptoms typical 12 during a detox process? 13 A Yes, they are. 14 Q Okay. 15 MS. MEYERS: Can we, please, go to the 16 entry for August 12th, 2014. 17 Q And I believe you looked at this 18 earlier, but I'd just like to direct your 19 attention to the last line in this first 20 paragraph, "MD arriving this morning and will 21 assess patient." 22 Do you see that?
1344	1 MS. MEYERS: Could we first go to the 2 entry dated August 8th, 2014. 3 Q Ms. Lloyd, does this refresh your 4 recollection as to when you arrived on the island 5 to assist Mr. Depp in his detox process? 6 A According to my notes, it was 7 August 8th. 8 Q Okay. And, so, as I think we 9 established earlier, you met Mr. Depp in June. 10 Fair to say that you had known him for about 11 two months at this time? 12 A Correct. 13 Q Okay. 14 MS. MEYERS: Can we please go to the 15 entry for August 11th, 2014. 16 Q And this is a note you prepared? 17 A Yes. 18 Q Okay. If you need to take a minute and 19 read it over, just let me know when you're done or 20 I can go right into it. 21 A Okay. 22 Q Okay. Fair to say that this note	1346	1 A Where are we on? 2 Q So directing your attention to the 3 August 12th, 2014 entry. 4 A Yes, I see it. Sorry. 5 Q Oh, okay. 6 And so, based on your note, it appears 7 that Dr. Kipper arrived on the island on 8 August 12th; is that correct? 9 A Correct. 10 Q Okay. Was the plan always for 11 Dr. Kipper to come down to the island to attend to 12 Mr. Depp? 13 A I don't recall. 14 Q Do you recall any issues in your caring 15 for Mr. Depp prior to Dr. Kipper's arrival? 16 A I don't recall. 17 Q Do you recall any medical issues 18 arising with Mr. Depp before Dr. Kipper arrived 19 that caused you concern? 20 A I don't recall. 21 Q If there had been a serious medical 22 issue with Mr. Depp prior to Dr. Kipper's arrival,

1347	<p>1 would that have been reflected in your notes? 2 <b>A Yes.</b> 3 Q If Mr. Depp's behavior had been 4 unmanageable prior to Dr. Kipper's arrival, would 5 that have been reflected in your notes? 6 <b>A Yes.</b> 7 MS. MEYERS: Can we, please, go to the 8 next entry for August 13th. 9 Q And, Ms. Lloyd, this is also a note 10 that you prepared? 11 <b>A Yes.</b> 12 Q Now, I'd like to direct your attention 13 to the portion of the note that starts with 14 "1340." 15 Again, this is military time; is that 16 right? 17 <b>A Correct.</b> 18 Q And I think you testified earlier this 19 is the time that you prepared the note, not the 20 time of the events reflected in the note; is that 21 right? 22 <b>A Yes. Sometimes – I mean, I don't</b></p>	1349	<p>1 entry for August 17th, 2014. 2 Q Do you see that? 3 <b>A I do.</b> 4 Q And this is a note you prepared? 5 <b>A Correct.</b> 6 Q Do you recall this specific event? 7 <b>A I do not.</b> 8 Q Do you have any reason to doubt that 9 what is reflected in your note is accurate? 10 <b>A No.</b> 11 Q Okay. So when you wrote "RN and MD 12 found patient sitting quietly on his porch," you 13 believe that's an accurate recitation of how you 14 found Mr. Depp on this date? 15 <b>A Correct.</b> 16 Q When you wrote that he was calm and 17 stated he was frustrated, you have no reason to 18 doubt the accuracy of that statement? 19 <b>A Correct.</b> 20 MS. MEYERS: Could we, please, bring 21 back up Exhibit 23 and, specifically, go to the 22 August 18th, 2014 entry, which is on DEPP 1677.</p>
1348	<p>1 <b>recall specifics, but sometimes they were at</b> 2 <b>times, and sometimes they were done later.</b> 3 Q So, generally speaking, when you 4 prepared these nursing notes, how long after the 5 events reflected in the note was the note actually 6 prepared by you? 7 <b>A It varied.</b> 8 Q Okay. So directing your attention back 9 to the portion that starts with "1340." 10 Do you see where it says "Patient's 11 fiancée texted to say he wasn't feeling well. MD 12 orders Pheno 64.8 milligrams, Neurontin 13 600 milligrams stat. Patient and fiancée informed 14 that today and tomorrow will be the most difficult 15 days and to keep in close contact with us." 16 Do you see that? 17 <b>A Yes.</b> 18 Q Do you recall informing Mr. Depp and 19 Ms. Heard that the following days would be the 20 most difficult? 21 <b>A Just what was stated in my notes.</b> 22 MS. MEYERS: Can we, please, go to the</p>	1350	<p>1 Q Ms. Lloyd, I'd like to direct your 2 attention to -- well, first of all, this is a note 3 that you prepared, correct? 4 <b>A Correct.</b> 5 Q And I'd like to direct your attention 6 to the end of the note, which is actually on the 7 second page -- or the next page. 8 Do you see at the end here, where it 9 says "Patient was escorted" back -- or "escorted 10 to bed"? 11 Do you see that? 12 <b>A Yes.</b> 13 Q Would that have been you who escorted 14 Mr. Depp to bed? 15 <b>A I don't recall.</b> 16 Q You testified earlier, though, that you 17 did see Mr. Depp in the home that he was staying 18 in on the island, correct? 19 <b>A Correct.</b> 20 Q And it says "Plans to leave the island 21 tomorrow." 22 Do you see that?</p>

<p style="text-align: right;">1351</p> <p>1     <b>A I do.</b> 2     Q And directing your attention to the 3 next note, August 19th. 4         Do you see that it says, next to 2335, 5 "Arrived back in LA"? 6     <b>A Yes.</b> 7     Q Okay. So does this accurately reflect 8 that you left the island on August 19th, 2014? 9     <b>A According to these notes, yes.</b> 10    Q I'd like to direct your attention to 11 the August 20th, 2014 entry, which starts on the 12 next page. And then, if you go to the next page, 13 as well, you can see that there's another entry 14 for August 20th, 2014. 15         Do you see that? 16    <b>A Oh, yeah. Yep.</b> 17    Q Okay. On this page here, I'd like to 18 direct your attention to the portion that starts 19 with "1250." 20         Do you see that? 21    <b>A Yes.</b> 22    Q Now, it says here "RN and MD spent time</p>	<p style="text-align: right;">1352</p> <p>1 talking with patient." 2         Do you see that? 3     <b>A I do.</b> 4     Q This would have been you and 5 Dr. Kipper, correct? 6     <b>A Correct.</b> 7     Q And does this reflect that you spoke 8 with Mr. Depp in person? 9     <b>A I don't recall. I would -- yes.</b> 10    Q Okay. And the note goes on to say 11 "Patient expressed frustration with the detox 12 process and was not liking how the phenobarb was 13 making him feel. Initially, he stated he was done 14 with the process and no longer wanted MD and RN 15 services. After processing his feelings and 16 realizing how far he had come, and that part of 17 his wanting to give up was due to tension between 18 him and his fiancée, patient, fiancée, RN, and MD 19 came up with a plan for fiancée to take a few days 20 for herself and patient was willing to continue 21 treatment but was going to refuse phenobarbital 22 from this point forward."</p>	<p style="text-align: right;">1353</p> <p>1         Do you see that? 2     <b>A I do.</b> 3     Q Did I read that correctly? 4     <b>A Yes.</b> 5     Q Do you recall tensions between Mr. Depp 6 and Ms. Heard at this stage in his detox process? 7     <b>A Yes.</b> 8     Q And what do you recall about that? 9     <b>A I recall Johnny feeling that she was</b> 10 <b>trying to interfere.</b> 11    Q In what way did he feel she was trying 12 to interfere? 13    <b>A By reporting to us things that he</b> 14 <b>didn't feel were true.</b> 15    Q Can you think of a specific instance 16 where Ms. Heard reported something to you that you 17 found out later was not true? 18    <b>A I can't -- I cannot remember specifics.</b> 19    Q Do you recall the plan for Ms. Heard to 20 take a few days for herself? 21    <b>A I don't recall specifics.</b> 22    Q But you do recall there being tension</p>	<p style="text-align: right;">1354</p> <p>1 between Mr. Depp and Ms. Heard around this time? 2     <b>A Yes.</b> 3     Q And you recall that having an impact on 4 Mr. Depp's treatment? 5     <b>A I don't recall specifics.</b> 6         MS. MEYERS: Let's go on to the entry 7 for August 25th, please. 8     Q First of all, is this a note that you 9 prepared? 10    <b>A It is.</b> 11    Q Directing your attention to the portion 12 that starts with "1900." 13         First line says "Meeting at MD's house 14 was quite stressful for patient." 15         Do you see that? 16    <b>A I do.</b> 17    Q Do you recall attending a meeting with 18 Mr. Depp at Dr. Kipper's house? 19    <b>A I don't recall.</b> 20    Q The next line says "Him and his fiancée 21 are having a hard time communicating and 22 understanding each other's point of view and</p>
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1355	1 feelings." 2 Do you see that? 3 <b>A I do.</b> 4 Q Do you recall any specifics about this 5 situation? 6 <b>A I do not.</b> 7 Q A couple sentences down, it says "Plan 8 is for fiancée to start therapy tomorrow." 9 Do you see that? 10 <b>A Yes.</b> 11 Q Do you recall that Ms. Heard started 12 therapy shortly after Mr. Depp's detox process? 13 <b>A I don't recall.</b> 14 Q Do you have any understanding as to why 15 Ms. Heard was starting therapy? 16 <b>A I do not.</b> 17 Q Directing your attention to the entry 18 for August 27th, 2014, which starts on DEPP 19 1687 -- or 86, excuse me. 1686, yep. 20 Again, this is an entry you prepared? 21 <b>A It is.</b> 22 Q Okay. Do you see where it says	1357	1 disagreement last night and that patient was able 2 to remain calm and handle the situation 3 appropriately." 4 Do you see that? 5 <b>A Yes.</b> 6 Q Do you recall Christi telling you that? 7 <b>A I do not.</b> 8 Q Now, do you see the portion of the note 9 that starts with "1330"? 10 <b>A I do.</b> 11 Q The second line reads "Patient 12 expressing feelings about argument with fiancée 13 and feels relationship is putting unwanted stress 14 on him right now." 15 Do you see that? 16 <b>A I do.</b> 17 Q Do you recall this exchange with 18 Mr. Depp? 19 Sorry, I didn't catch that. 20 <b>A I'm sorry. I do not.</b> 21 Q Based on this note, can you tell 22 whether this was a conversation you had in person
1356	1 "Received text from patient's sister that patient 2 had been recording music with his friend until 5 3 and did not go to sleep until 7 and is currently 4 sleeping"? 5 <b>A Yes.</b> 6 Q And who is Mr. Depp's sister that's 7 referred to here? 8 <b>A Christi.</b> 9 Q And at this time, had you met Christi 10 before? 11 <b>A I don't recall.</b> 12 Q Have you met Christi before? 13 <b>A Yes.</b> 14 Q How many times? 15 <b>A I don't know.</b> 16 Q More than once? 17 <b>A More than once, yes.</b> 18 Q At this time, had you communicated with 19 Christi about Mr. Depp's treatment before? 20 <b>A I don't recall.</b> 21 Q The entry goes on to say "Sister stated 22 that patient and his fiancée had had a	1358	1 with Mr. Depp? 2 <b>A Based on this note, yes.</b> 3 Q Do you recall, on other occasions, 4 Mr. Depp expressing to you that his relationship 5 was putting unwanted stress on him? 6 <b>A I'd have to review my notes.</b> 7 Q Okay. Directing your attention down to 8 the portion of the notes that starts with "2130." 9 It says "Patient back home. Per 10 patient, he" has a long -- "he had a long 11 conversation with fiancée and they both understand 12 that right now is a time to work on themselves as 13 individuals. Patient's fiancée now has an RN to 14 help her anxiety and to monitor her while she is 15 starting a new mood stabilizer medication." 16 Do you see that? 17 <b>A I do.</b> 18 Q Who was -- I believe you testified to 19 this earlier -- Ms. Heard's nurse was Erin Boerum; 20 is that right? 21 <b>A Correct.</b> 22 Q And Ms. Boerum was an employee of

1359	<p>1 yours; is that correct?</p> <p>2 <b>A She was an independent contractor.</b></p> <p>3 Q Okay. But you placed her with</p> <p>4 Dr. Kipper; is that right?</p> <p>5 <b>A Correct.</b></p> <p>6 Q Do you recall when Ms. Boerum was</p> <p>7 assigned to Ms. Heard?</p> <p>8 <b>A I do not recall.</b></p> <p>9 Q Do you have any understanding as to why</p> <p>10 Ms. Heard needed a nurse?</p> <p>11 <b>A Other than what my notes state, I do</b></p> <p>12 <b>not.</b></p> <p>13 Q Do you recall witnessing Ms. Heard</p> <p>14 being anxious, or having anxiety?</p> <p>15 <b>A I do not recall.</b></p> <p>16 Q Now, the last line here says "Patient</p> <p>17 feels this will take some of the stress off their</p> <p>18 relationship and in return," then we go to the</p> <p>19 next page, "take some stress off of him."</p> <p>20 Did I read that correctly?</p> <p>21 <b>A You did.</b></p> <p>22 Q Do you recall why Mr. Depp felt that</p>	1361	<p>1 Do you see that?</p> <p>2 <b>A I do.</b></p> <p>3 Q And does this reflect that you were</p> <p>4 physically with Mr. Depp at this time?</p> <p>5 <b>A It would, yes.</b></p> <p>6 Q Okay. A couple sentences down it says,</p> <p>7 and this portion is highlighted here, "While RN</p> <p>8 was visiting patient, fiancée came in and tried to</p> <p>9 start argument with him. Patient was able to stay</p> <p>10 calm and talk his fiancée down."</p> <p>11 Do you see that?</p> <p>12 <b>A I do.</b></p> <p>13 Q Do you recall the incident reflected in</p> <p>14 this note?</p> <p>15 <b>A I do not.</b></p> <p>16 Q Do you recall any instances where you</p> <p>17 witnessed Ms. Heard try and start a fight with</p> <p>18 Mr. Depp?</p> <p>19 <b>A Yeah.</b></p> <p>20 MR. NADELHAFT: Objection.</p> <p>21 Q How many instances do you remember?</p> <p>22 <b>A I don't recall specific numbers.</b></p>
1360	<p>1 Ms. Heard having a nurse would reduce the stress</p> <p>2 on their relationship?</p> <p>3 <b>A I do not recall.</b></p> <p>4 Q From your perspective, was it important</p> <p>5 for Mr. Depp's treatment that his stress be</p> <p>6 reduced?</p> <p>7 <b>A Yes.</b></p> <p>8 Q And why is that?</p> <p>9 <b>A Any patient going through detox or</b></p> <p>10 <b>changes, it's always important to relieve as much</b></p> <p>11 <b>stress as you can from them.</b></p> <p>12 MS. MEYERS: Let's go to the entry for</p> <p>13 September 10th, please, which is on DEPP 1694 and</p> <p>14 continues on to 1695.</p> <p>15 Q September 10, 2014 entry, this is your</p> <p>16 entry, correct, you prepared this?</p> <p>17 <b>A Correct. Sorry.</b></p> <p>18 Q And if I could direct your attention to</p> <p>19 the portion that starts with "2330," which is</p> <p>20 actually on the next page.</p> <p>21 The first line says "Met with patient.</p> <p>22 He complained of body aches and nausea."</p>	1362	<p>1 Q Do you remember at least one?</p> <p>2 <b>A Yes.</b></p> <p>3 Q Do you remember more than one?</p> <p>4 <b>A Yes.</b></p> <p>5 Q More than two?</p> <p>6 <b>A I don't recall specific numbers.</b></p> <p>7 Q What do you remember about that first</p> <p>8 incident, that you can remember?</p> <p>9 <b>A I remember, one night, trying to leave</b></p> <p>10 <b>the penthouse and Amber standing in the elevator</b></p> <p>11 <b>and not letting us leave.</b></p> <p>12 Q Why wasn't she letting you leave?</p> <p>13 <b>A She didn't want him to leave.</b></p> <p>14 Q Had they been fighting previous to that</p> <p>15 point?</p> <p>16 <b>A I wasn't there previously.</b></p> <p>17 Q And what's the other instance you</p> <p>18 remember?</p> <p>19 <b>A I can't remember specifics.</b></p> <p>20 Q Do you have any reason to doubt the</p> <p>21 accuracy of what's reflected in your note here?</p> <p>22 <b>A No.</b></p>

1363

1 Q Do you have any understanding as to  
2 what you meant when you said "patient was able to"  
3 remain calm -- "was able to stay calm," excuse me,  
4 "and talk his fiancée down"?  
5 **A I don't recall the events of that note.**  
6 Q Had you seen Mr. Depp and Ms. Heard get  
7 in a fight before this date?  
8 **A I don't recall.**  
9 MS. MEYERS: Let's go to the entry of  
10 September 12th, please.  
11 Q And this is a note that you prepared as  
12 well, Ms. Lloyd?  
13 **A That is correct.**  
14 Q Okay. The first line here says "RN and  
15 MD visited patient at work."  
16 Do you see that?  
17 **A I do.**  
18 Q And so, this reflects that both you and  
19 Dr. Kipper went and saw Mr. Depp; is that right?  
20 **A Correct.**  
21 Q And the entry states here, patient  
22 expressed some concerns with fiancée's behavior

1364

1 and how it is adding stress to his life.  
2 Do you see that?  
3 **A I do.**  
4 Q Do you recall Mr. Depp saying this to  
5 you in this instance?  
6 **A I do not.**  
7 Q Do you have any reason to doubt the  
8 accuracy of what's reflected in your note?  
9 **A I do not.**  
10 MS. MEYERS: Could we please go to the  
11 entry for October 22nd, 2014, which starts on 1717  
12 and continues on to Depp 1718.  
13 **A My notes are different. What's the top**  
14 **of the -- can I see the top of that, just so I**  
15 **know what I'm looking for? Okay.**  
16 Q First of all, this is also a note that  
17 you prepared, correct?  
18 **A Correct.**  
19 Q And if you want to take a minute and  
20 read through the note, I know it goes on for two  
21 pages.  
22 **A Okay.**

1365

1 Q Just let me know when you've read  
2 through this.  
3 **A Okay.**  
4 Q Fair to say that this note reflects  
5 that you and Mr. Depp are in Georgia when the  
6 events in this note occurred?  
7 **A I think we were. At the end, it says**  
8 **"now in Georgia." I don't recall that it was a**  
9 **travel day.**  
10 Q Well, you see above that, where it says  
11 "10/22," and then below it, it says "now in  
12 Georgia"?  
13 **A Yes.**  
14 Q So based on your notes, you were in  
15 Georgia on October 22nd, 2014?  
16 **A All right.**  
17 Q Do you recall being in Georgia with  
18 Mr. Depp?  
19 **A Yes.**  
20 Q Do you recall who else was with you in  
21 Georgia?  
22 **A I don't recall who was with us, but the**

1366

1 **purpose of the trip was to visit Amber on**  
2 **location.**  
3 Q Okay. So Amber was in Georgia as well?  
4 **A Yes.**  
5 Q Okay. Now, directing your attention to  
6 the entry that's on the next page and begins with  
7 "1530." It states here, "He requested an  
8 emergency session with the psychiatrist to discuss  
9 feeling about arguments with fiancée and would  
10 like some tools to help him" feel -- "help him  
11 feel with his emotions."  
12 Do you see that?  
13 **A I do.**  
14 Q Do you recall Mr. Depp and Ms. Heard  
15 having a fight on this trip in Georgia?  
16 **A I do not.**  
17 Q Do you recall who Mr. Depp's  
18 psychiatrist was at this time?  
19 **A I do not.**  
20 Q Do you recall why Mr. Depp started  
21 seeing a psychiatrist?  
22 **A I do not.**

1367	1 Q Directing your attention down to the 2 portion of the note that starts with "2010." It 3 says here "Patient spoke to a psychiatrist for 4 50 minutes and was open and honest with his 5 feelings. He feels better after conversation but 6 also feels he is in a no-win situation with 7 fiancée." 8 Do you see that? 9 A I'm kind of lost where we're at right 10 now. 11 Q Oh, sorry. 12 FEMALE SPEAKER: Yes, yes, sorry. 13 Q Does this reflect that you were present 14 with Mr. Depp when he spoke with his psychiatrist? 15 A I don't remember if it was based on him 16 telling me or if I was present. 17 Q Do you recall Mr. Depp ever expressing 18 to you that he felt he was in a no-win situation 19 with Ms. Heard? 20 A I don't recall the specific words. 21 Q But you wrote them in your nursing 22 note, correct?	1369	1 A It is. 2 Q Okay. It says here you text patient to 3 see if RN could come by and check in. 4 Do you see that? 5 A I did - I do. 6 Q Why did you want to check in on 7 Mr. Depp? 8 A I don't recall. 9 Q Were you ever concerned about Mr. Depp 10 when he and Ms. Heard were in arguments? 11 A Yes. 12 Q Why were you concerned? 13 A Their arguments were a trigger for him 14 emotionally. 15 Q Any other reason? 16 A No. 17 Q What do you mean by "a trigger for him 18 emotionally"? 19 A It would cause him to be upset, add 20 stress. 21 Q The next portion of this note says 22 "When RN arrived in the room, patient was agitated
1368	1 Do you see the box -- so, still in this 2 portion that starts with 2010. Do you see where 3 it says "Plan is for patient and fiancée to go to 4 dinner this evening. Patient is feeling exhausted 5 and wants to stay home but does not want to upset 6 fiancée." 7 Do you see that? 8 A Are we on the same page? 9 Q Yes. We're still in the portion of the 10 note that starts with 2010. 11 A 2010. Okay. Yes. Yep. 12 Q Do you recall this specific incident? 13 A I do not. 14 Q Do you have any understanding as to why 15 Mr. Depp would be concerned about upsetting his 16 fiancée? 17 A I do not. 18 Q All right. 19 MS. MEYERS: If we can go on to the 20 next entry, which is on the same page, 1023. 21 Q And this is also a note you prepared, 22 Ms. Lloyd?	1370	1 and felt fiancée was using the term mania" to 2 express -- "to explain his behavior and excuse 3 herself from any fault during argument." 4 Do you see that? 5 A Yeah. 6 Q Do you have any -- did you ever hear 7 Ms. Heard use the term "mania" to describe 8 Mr. Depp? 9 A I don't recall if that was - I heard 10 it from her or heard that she was saying it to 11 others. 12 Q But you do have some recollection of 13 hearing that Ms. Heard was using that word, 14 whether it was directly from her or from others? 15 A Yes. 16 Q The note goes on to say "Patient was 17 upset by this label. RN processes feelings with 18 patient and he was able to see fiancée's negative 19 behaviors." 20 Did I read that correctly? 21 A Yes. 22 Q Did you have any recollection of what

1371	1 you meant when you wrote that? 2 <b>A I do not.</b> 3 Q You don't have any understanding of 4 what "fiancée's negative behaviors" refers to? 5 <b>A I don't recall specifics.</b> 6 Q Do you recall generally? 7 <b>A Yes.</b> 8 Q And what do you recall? 9 <b>A At times -- what's the word -- she</b> 10 <b>would almost try to instigate him.</b> 11 Q And when you say "she," you're 12 referring to Ms. Heard? 13 <b>A Yes.</b> 14 Q Did you ever witness that personally? 15 <b>A Yes.</b> 16 Q On more than one occasion? 17 <b>A Yes.</b> 18 Q Ballpark, how many times did you 19 witness that during their -- during the time you 20 cared for Mr. Depp? 21 <b>A I don't recall a number.</b> 22 Q More than five?	1373	1 MS. MEYERS: Could we, please, go to 2 the entry for November 3rd, 2014, which is on DEPP 3 172? 4 AV TECHNICIAN: 172? Sorry, Counsel. 5 MS. MEYERS: Yeah, 1721. 6 Q Ms. Lloyd, this is also a note you 7 prepared? 8 <b>A Correct.</b> 9 Q And it says here you arrived at 10 Mr. Depp's home and he was "focused on 11 relationship with fiancée and is struggling with 12 conflicted emotions." 13 Did I read that right? 14 <b>A Yes.</b> 15 Q Based on this note, is that something 16 Mr. Depp would have told you? 17 <b>A Based on this note, it appears so.</b> 18 Q Looks like there's another note for 19 November 3rd below this one. 20 Do you see that? And it continues on 21 to the next page, which is DEPP 1722. 22 MS. MEYERS: If we could go there,
1372	1 <b>A I don't recall.</b> 2 Q When you say Ms. Heard would try to 3 "instigate him," what do you mean? 4 <b>A I remember an argument -- or being in</b> 5 <b>there when he was going from room to room trying</b> 6 <b>to remove himself from a situation, and she would</b> 7 <b>just follow him from room to room and not give him</b> 8 <b>his space.</b> 9 Q And that's one specific instance that 10 you remember? 11 <b>A Yes.</b> 12 Q Do you remember seeing that type of 13 behavior on other occasions? 14 <b>A Yes.</b> 15 Q Are you aware of any of the fights that 16 we just went through, are you aware that any of 17 them became physical? 18 <b>A No.</b> 19 Q From what you observed, what was the 20 cause of the friction between Mr. Depp and 21 Ms. Heard during this time? 22 <b>A I don't know.</b>	1374	1 please. 2 Q And, Ms. Lloyd, directing your 3 attention to the portion that starts with "1700," 4 do you see where it says "RN went back to 5 patient's house. He was chatting with a friend 6 and was feeling stressed about his relationship"? 7 Do you see that? 8 <b>A I do.</b> 9 Q And it goes on to say "He feels she is 10 not being truthful with him and he is not sure how 11 to" comfort her about this when -- excuse me, 12 "confront her about this when she arrives home." 13 Do you see that? 14 <b>A Yes.</b> 15 Q And the "she" here refers to Ms. Heard; 16 is that right? 17 <b>A Correct.</b> 18 Q Do you remember this exchange with 19 Mr. Depp? 20 MR. NADELHAFT: Objection. 21 Q Do you have any reason to doubt the 22 accuracy of your note?

1375	1 <b>A I do not.</b> 2 MS. MEYERS: If we could turn to the 3 entry for November 17th, 2014, which begins on 4 DEPP 1723. 5 Q Ms. Lloyd, do you see, at the very 6 bottom, it says 11/17? 7 <b>A Yes.</b> 8 Q Okay. And then I think the entry 9 itself is on the next page. 10 MS. MEYERS: Yes. Thank you. 11 Q This is also a note you prepared? 12 <b>A Correct.</b> 13 Q And this says "RN and MD went to 14 patient's house to assess him." 15 Do you see that? 16 <b>A I do.</b> 17 Q Again, does this reflect that you and 18 Dr. Kipper went to see Mr. Depp? 19 <b>A Correct.</b> 20 Q Do you have any recollection of why 21 Mr. -- excuse me, why Dr. Kipper was visiting with 22 Mr. Depp at this time?	1377	1 Q But you said -- you testified earlier 2 that you did attend the wedding? 3 <b>A Correct.</b> 4 Q Were you there to provide nursing 5 services? 6 <b>A I don't really recall if I was a guest 7 or -- I don't think they made that clear to me.</b> 8 Q Did Dr. Kipper attend the wedding? 9 <b>A He did.</b> 10 Q And did Erin Boerum attend the wedding? 11 <b>A She did.</b> 12 Q Do you recall any discussions of a 13 prenuptial agreement between Mr. Depp and 14 Ms. Heard before they got married? 15 <b>A Yes.</b> 16 Q And what do you recall? 17 <b>A I don't recall specifics.</b> 18 Q What do you recall, generally? 19 <b>A I only recall what Johnny told me about 20 the conversation.</b> 21 Q And what was that? 22 <b>A That she didn't take it well.</b>
1376	1 <b>A I do not.</b> 2 Q The next line says "Patient appears 3 anxious and depressed over relationship issues." 4 Do you see that? 5 <b>A I do.</b> 6 Q And then it says "Patient continues to 7 be ambivalent about relationship status." 8 Do you see that? 9 <b>A I do.</b> 10 Q Do you recall Mr. Depp expressing these 11 sentiments to you? 12 MR. NADELHAFT: Objection. Hearsay. 13 <b>A I don't recall specific conversations.</b> 14 Q But you also have -- but this is what 15 you wrote in your notes, correct? 16 I'm sorry, I didn't catch that. 17 <b>A Correct. Sorry.</b> 18 Q Thank you. 19 <b>A Sorry.</b> 20 Q Do you recall when Mr. Depp and 21 Ms. Heard got married? 22 <b>A I don't recall the date.</b>	1378	1 Q Didn't take what well? 2 <b>A The idea.</b> 3 Q Sorry. I didn't hear the end of that. 4 <b>A The idea of having to sign a prenup.</b> 5 Q Did Johnny tell you that he asked 6 Ms. Heard to sign a prenup? 7 <b>A I don't recall specifics.</b> 8 Q But you recall Johnny telling you that 9 Ms. Heard didn't want to sign a prenup? 10 <b>A Yes.</b> 11 Q And when you say "didn't take that 12 well," what are you referring to? 13 <b>A From what Johnny said, her reaction was 14 when he asked -- when they spoke about the prenup.</b> 15 Q Do you recall that in January of 2015, 16 Mr. Depp and Ms. Heard traveled to Japan together? 17 <b>A I don't recall.</b> 18 Q Do you recall traveling to Japan with 19 Mr. Depp? 20 <b>A I recall being in Japan, yes.</b> 21 Q Do you remember anything specific about 22 that trip?

1379	<p>1 <b>A I do not.</b></p> <p>2 Q Do you recall Mr. Depp and Ms. Heard</p> <p>3 having a fight on a plane?</p> <p>4 <b>A I recall a fight on a plane, but I</b></p> <p>5 <b>don't know the time it was around.</b></p> <p>6 Q What do you remember about that fight?</p> <p>7 <b>A It was another instance where he was</b></p> <p>8 <b>sitting at a table and not wanting to talk and she</b></p> <p>9 <b>wouldn't leave the table.</b></p> <p>10 Q What was she doing?</p> <p>11 <b>A She wouldn't leave the table and he was</b></p> <p>12 <b>saying, you know, "please, just go away."</b></p> <p>13 Q And what was she saying?</p> <p>14 <b>A I don't remember her words.</b></p> <p>15 Q How was her tone?</p> <p>16 <b>A I don't recall.</b></p> <p>17 Q You spoke with Mr. Nadelhaft about this</p> <p>18 earlier, but at some point, you traveled to</p> <p>19 Australia with Mr. Depp, right?</p> <p>20 <b>A Correct.</b></p> <p>21 MS. MEYERS: Can we pull up what has</p> <p>22 been previously marked as Exhibit 14.</p>	1381	<p>1 <b>A Yes.</b></p> <p>2 Q You've talked about this with</p> <p>3 Mr. Nadelhaft earlier. At some point, in</p> <p>4 Australia, you learned that Mr. Depp had injured</p> <p>5 his finger, correct?</p> <p>6 <b>A Correct.</b></p> <p>7 Q And Dr. Kipper was already in Australia</p> <p>8 at that time?</p> <p>9 <b>A Correct.</b></p> <p>10 Q And you testified earlier that you and</p> <p>11 Dr. Kipper went to see Mr. Depp after he injured</p> <p>12 his finger, correct?</p> <p>13 <b>A Correct.</b></p> <p>14 Q Do you recall anything about -- what do</p> <p>15 you recall about Mr. Depp's physical appearance</p> <p>16 when you first saw him?</p> <p>17 <b>A I don't recall specifics.</b></p> <p>18 Q What do you remember about his</p> <p>19 demeanor, if anything?</p> <p>20 <b>A I don't remember the events of when I</b></p> <p>21 <b>first arrived.</b></p> <p>22 Q But you did see Mr. Depp at that time,</p>
1380	<p>1 Q I would like to direct your attention</p> <p>2 to the March 1st, 2015 email from Dr. Kipper at</p> <p>3 2:10 p.m.</p> <p>4 Do you see that?</p> <p>5 <b>A I do.</b></p> <p>6 Q Do you recall Mr. Depp having issues</p> <p>7 with his sleep when he was in Australia?</p> <p>8 <b>A Not specifically in Australia.</b></p> <p>9 Q Do you recall Mr. Depp having issues</p> <p>10 with his sleep, generally?</p> <p>11 <b>A Yes.</b></p> <p>12 Q And what issues were those?</p> <p>13 <b>A A hard time sleeping and staying on a</b></p> <p>14 <b>sleep schedule.</b></p> <p>15 Q Ms. Lloyd, when you were in Australia</p> <p>16 with Mr. Depp, did you see where he was staying?</p> <p>17 <b>A Yes.</b></p> <p>18 Q And how many times did you go to that</p> <p>19 property?</p> <p>20 <b>A I don't recall specific numbers.</b></p> <p>21 Q Fair to say you went there multiple</p> <p>22 times, though?</p>	1382	<p>1 correct?</p> <p>2 <b>A I can't recall when I initially saw him</b></p> <p>3 <b>after the finger event.</b></p> <p>4 Q And I believe you testified you don't</p> <p>5 recall whether Ms. Heard was at the house when you</p> <p>6 went to attend to Mr. Depp, correct?</p> <p>7 <b>A Correct.</b></p> <p>8 Q Do you remember seeing Ms. Heard in</p> <p>9 Australia?</p> <p>10 <b>A Yes.</b></p> <p>11 Q Did you ever see any injuries on</p> <p>12 Ms. Heard when she was in Australia?</p> <p>13 <b>A Yes.</b></p> <p>14 Q What did you see?</p> <p>15 <b>A A bruise on her arm.</b></p> <p>16 Q Anything else?</p> <p>17 <b>A No.</b></p> <p>18 Q Did she have any injuries to her face,</p> <p>19 that you can recall?</p> <p>20 <b>A Not that I recall.</b></p> <p>21 Q Any cuts or abrasions, that you can</p> <p>22 recall?</p>

<p style="text-align: right;">1383</p> <p>1     <b>A Not that I recall.</b></p> <p>2     Q Do you recall Ms. Heard ever seeking</p> <p>3 medical treatment from you while she was in</p> <p>4 Australia?</p> <p>5     <b>A I do not recall her ever seeking</b></p> <p>6 <b>medical treatment from me.</b></p> <p>7     Q At the time that Mr. Depp injured his</p> <p>8 finger, Ms. Heard was a patient of Dr. Kipper,</p> <p>9 correct?</p> <p>10    <b>A I'm not sure.</b></p> <p>11    Q Do you recall whether Ms. Boerum was</p> <p>12 already assigned to Ms. Heard?</p> <p>13    <b>A I don't recall if she was working with</b></p> <p>14 <b>her at that time.</b></p> <p>15       MS. MEYERS: Can we turn back to the</p> <p>16 nursing notes, which is Exhibit 23. And,</p> <p>17 specifically, the entry for March 7th, which is on</p> <p>18 1732.</p> <p>19    <b>A Is this March 7th of 2014 or --</b></p> <p>20    Q Yes. It says "3/7/15."</p> <p>21       Do you see that?</p> <p>22    <b>A 3/7/15, no. Yes.</b></p>	<p style="text-align: right;">1385</p> <p>1     <b>A Yes.</b></p> <p>2     Q What does "R middle finger" reflect?</p> <p>3     <b>A Right.</b></p> <p>4     Q And so, Mr. Depp had cut his middle</p> <p>5 right finger; is that correct?</p> <p>6     <b>A According to this, yes.</b></p> <p>7     Q Now, if I could direct your attention</p> <p>8 down to the bottom part of this entry that starts</p> <p>9 with "1130."</p> <p>10       Do you see that?</p> <p>11    <b>A I do.</b></p> <p>12    Q Now, this starts with "Patient and</p> <p>13 staff returned from ER at 2130."</p> <p>14       Do you see that?</p> <p>15    <b>A Yes.</b></p> <p>16    Q So, am I -- is it correct that the</p> <p>17 1130, at the beginning of this, is referring to</p> <p>18 11:30 p.m.?</p> <p>19    <b>A Yeah. That would make sense.</b></p> <p>20    Q So, this is the same day that you were</p> <p>21 notified that Mr. Depp had injured his finger,</p> <p>22 correct?</p>
<p style="text-align: right;">1384</p> <p>1     Q You said you saw a bruise on</p> <p>2 Ms. Heard's arm at some point when you were in</p> <p>3 Australia, correct?</p> <p>4     <b>A Correct.</b></p> <p>5     Q Do you have any understanding of how</p> <p>6 she got that bruise?</p> <p>7     <b>A I do not.</b></p> <p>8     Q Okay. Directing your attention to the</p> <p>9 entry for March 7th, 2015.</p> <p>10       Do you see here it says "MD received</p> <p>11 text message from client that he had been arguing</p> <p>12 with his wife and that he cut his finger"?</p> <p>13    <b>A Yes, I see that.</b></p> <p>14    Q Okay. So this is the day that you went</p> <p>15 and saw Mr. Depp after his injury, correct?</p> <p>16    <b>A Correct.</b></p> <p>17    Q Now, if I could direct your attention</p> <p>18 down to the portion that starts with "1530."</p> <p>19    <b>A Okay.</b></p> <p>20    Q It says "MD cleaned and dressed wound</p> <p>21 to R middle finger."</p> <p>22       Do you see that?</p>	<p style="text-align: right;">1386</p> <p>1     <b>A According to this, yes.</b></p> <p>2     Q Okay. And this was also the same day</p> <p>3 that Mr. Depp was seen in the ER for his finger,</p> <p>4 correct?</p> <p>5     <b>A Correct.</b></p> <p>6     Q In the middle of the page here, do you</p> <p>7 see -- in the middle of this entry, do you see</p> <p>8 where it says "Upon arrival back to the apartment,</p> <p>9 patient expressed feelings of anger and sadness</p> <p>10 about his relationship. Patient was encouraged to</p> <p>11 stay away from wife, as the relationship is toxic.</p> <p>12 Patient expressed verbal understanding and why</p> <p>13 they needed to separate."</p> <p>14       Do you see that?</p> <p>15    <b>A Yes.</b></p> <p>16    Q Do you have any recollection of this</p> <p>17 conversation, beyond what's reflected in the</p> <p>18 notes?</p> <p>19    <b>A I do not.</b></p> <p>20    Q Do you have any reason to doubt the</p> <p>21 accuracy of what you documented in your notes?</p> <p>22    <b>A I do not.</b></p>



<p style="text-align: right;">1387</p> <p>1 Q Do you recall advising Mr. Depp to stay 2 away from Ms. Heard? 3 A <b>I don't recall anything other than 4 what's stated in my notes.</b> 5 Q Do you recall ever having the view that 6 Mr. Depp and Ms. Heard's relationship was toxic? 7 A <b>Yes.</b> 8 Q And what's the basis for that view? 9 A <b>Conversations that he would share with 10 me.</b> 11 Q What did Mr. Depp share with you? 12 A <b>I don't remember specifics, just, like, 13 things we reviewed in my notes, that he would be 14 emotional and that the relationship was causing 15 him stress.</b> 16 Q After Mr. Depp injured his finger in 17 Australia, do you recall him coming back to LA? 18 A <b>I don't recall specifics, but I know we 19 did return to LA at some point.</b> 20 Q Was Mr. Depp's hand bandaged at all? 21 A <b>Yes.</b> 22 Q And why was that?</p>	<p style="text-align: right;">1389</p> <p>1 see in the middle it says "currently 5/10"? 2 A <b>Yes.</b> 3 Q Do you know what that refers to? 4 A <b>It's a pain scale.</b> 5 Q And is that how Mr. Depp would report 6 his pain to you? 7 A <b>According to my notes.</b> 8 Q Okay. So, now going to the entry for 9 March 23rd. First of all, do you see the portion 10 of the entry that starts with "120"? 11 A <b>Yes.</b> 12 Q Is this 1:20 in the morning, a.m.? 13 A <b>According to this, yes.</b> 14 Q Do you see it says "patient states his 15 wife is trying to argue with him"? 16 A <b>I see that.</b> 17 Q And, again, you have no reason to doubt 18 the accuracy of your note? 19 A <b>Correct.</b> 20 Q Turning to the next page. Do you see 21 the portion of the note that starts with "545"? 22 A <b>Yes.</b></p>
<p style="text-align: right;">1388</p> <p>1 A <b>At one -- I mean, beforehand, we kept 2 it bandaged to keep it clean, and then he had 3 surgery, and it was bandaged after the surgery.</b> 4 Q Do you recall that Mr. Depp had pins in 5 his finger? 6 A <b>Yes.</b> 7 Q Do you recall Mr. Depp reporting that 8 his finger was in pain? 9 A <b>Yes.</b> 10 Q How would he report his pain to you? 11 A <b>I'd have to review my notes for 12 specifics.</b> 13 Q Let's take a look at the entry in your 14 notes for March 23rd, 2015, which is on page -- it 15 starts on page 1735 and goes on to 736. 16 A <b>I see it.</b> 17 Q Actually, before we turn to that one, 18 do you see, in the entry above for 3/22/15? Do 19 you see that entry? 20 A <b>Yes.</b> 21 Q Okay. And do you see next to 20 -- the 22 portion of the entry that starts with 2015, do you</p>	<p style="text-align: right;">1390</p> <p>1 Q And it says "called to loft," correct? 2 A <b>Yes.</b> 3 Q What does that refer to? 4 A <b>I don't know specifically. Loft is 5 where they were living.</b> 6 Q Is that the Eastern Columbia Building? 7 A <b>Correct.</b> 8 Q And then, the next two sections of this 9 note says "0820 torod, val," and then at 1445, the 10 same thing. 11 Do you see that? 12 A <b>Yes.</b> 13 Q What is that referring to? 14 A <b>Incomplete note. It would have been 15 Toradol and Valium administered.</b> 16 Q Do you have any recollection as to why 17 those medications would have been administered? 18 A <b>They were for his pain.</b> 19 Q And then do you see below that it says 20 "F/u Thursday afternoon and Tuesday afternoon. 21 Skin graft bandage off week from Tuesday. Pin off 22 in two weeks"?</p>

1391	1 <b>A Yes.</b> 2 Q What does this reflect? 3 <b>A I don't recall.</b> 4 Q Did Mr. Depp have a skin graft on his 5 finger? 6 <b>A He did.</b> 7 Q And I think you testified that -- you 8 just testified that he had pins in his finger as 9 well, right? 10 Sorry, I didn't hear that. 11 <b>A Correct.</b> 12 Q Okay. So, at this time, on March 23rd, 13 he had bandages and a skin graft and pins in his 14 finger? 15 <b>A According to this, yes.</b> 16 Q And then, do you see, in the section 17 that starts with 2000, "Patient informed wife is 18 coming to talk to him and he became extremely 19 anxious." 20 Do you see that? 21 <b>A I do.</b> 22 Q Do you have any recollection of why	1393	1 Whitney Heard is? 2 <b>A Yes.</b> 3 Q Have you met her before? 4 <b>A Yes.</b> 5 Q On how many occasions have you met 6 Whitney? 7 <b>A I don't recall.</b> 8 Q And what is Whitney's relation to 9 Ms. Heard? 10 <b>A Sister.</b> 11 Q So the first text message appears to be 12 from Erin, says Debbie just -- and it's on 14 -- 13 is that 1432, military time, on the date 14 March 23rd, 2015. 15 Do you see that? 16 <b>A Yes.</b> 17 Q Okay. And it says "Debbie just told me 18 what is going on and to check with you. Is Amber 19 awake or falling asleep?" 20 Do you see that? 21 <b>A Yes.</b> 22 Q Do you recall reaching out to Erin
1392	1 Mr. Depp was anxious? 2 <b>A I do not.</b> 3 Q Do you remember being present for a 4 fight with Mr. Depp -- between Mr. Depp and 5 Ms. Heard shortly after Mr. Depp returned from 6 Australia? 7 <b>A I don't remember specifics.</b> 8 Q Do you recall a fight when Amber's 9 sister, Whitney, was present? 10 <b>A I don't recall.</b> 11 MS. MEYERS: Can we please pull up 12 document H, please. 13 AV TECHNICIAN: Exhibit 27. 14 Q Now, just for the record, this is a 15 document that has a Bates number WH106 through 16 109. And, Ms. Lloyd, you're not included on this, 17 but I just want to direct your attention to the 18 first text message here. This is -- I can 19 represent to you these are text messages between 20 Erin Boerum and Whitney Heard. 21 <b>A Okay.</b> 22 Q Before I proceed, do you know who	1394	1 Boreum on this date? 2 <b>A I do not.</b> 3 Q Directing your attention down to 4 Whitney -- to three messages down from Whitney -- 5 or, excuse me, let's go up. 6 Do you see that Whitney responds to 7 Erin, "she finally fell asleep." 8 And then Erin says, "Thank goodness. 9 She must be exhausted. Do you want me to come to 10 the loft or is she safe and sound asleep?" 11 Do you see that? 12 <b>A Yes.</b> 13 Q And then Whitney says "Safe? No. 14 She's not. She keeps saying she wants to kill 15 herself." 16 Do you see that? 17 <b>A I do.</b> 18 Q Did you ever hear Ms. Heard say that 19 she wanted to kill herself? 20 <b>A No.</b> 21 Q Do these text messages, combined with 22 your notes, refresh your recollection about an

<p style="text-align: right;">1395</p> <p>1 incident that occurred on March 23rd, 2016? 2 <b>A I remember an incident, but I don't</b> 3 <b>remember the date of it.</b> 4 Q What incident are you remembering? 5 <b>A There is an incident where Johnny and</b> 6 <b>Amber got into a fight at the loft.</b> 7 Q And what do you remember about that? 8 <b>A I was staying next door at a hotel and</b> 9 <b>security had come to get me saying that they had</b> 10 <b>had an argument and Johnny wanted to go back to</b> 11 <b>86.</b> 12 Q Sorry. Is 86 the Sweetzer property? 13 <b>A Yes.</b> 14 Q Sorry. Continue. 15 <b>A So I went to the lofts, and I remember</b> 16 <b>that night, Amber was already leaving. She was in</b> 17 <b>the lobby when we walked through. And when she</b> 18 <b>saw that I was coming, she came back up to the</b> 19 <b>apartment.</b> 20 Q And what happened when Ms. Heard came 21 back up to the apartment? 22 <b>A I don't remember specifically what</b></p>	<p style="text-align: right;">1397</p> <p>1 <b>A I saw Johnny push over one of Amber's</b> 2 <b>clothing racks.</b> 3 Q Okay. No physical violence directed at 4 any human, correct? 5 <b>A No.</b> 6 Q Okay. You said you didn't end up 7 leaving the apartment after that, correct? 8 <b>A At some point that night, we left.</b> 9 Q When you say "we," who does that 10 include? 11 <b>A Myself, Johnny, and Travis.</b> 12 Q And where did you go? 13 <b>A I don't remember.</b> 14 Q Do you know where Amber was that night? 15 <b>A I don't know.</b> 16 Q But she didn't come with you? 17 <b>A No.</b> 18 THE COURT: Ladies and gentlemen, let's 19 go ahead and take our afternoon recess for 20 15 minutes, okay? Again, don't talk to anybody 21 and don't do any outside research, okay? All 22 right. We'll see you in 15 minutes.</p>
<p style="text-align: right;">1396</p> <p>1 <b>happened. I remember Johnny was sitting outside</b> 2 <b>and we went to leave and somehow we didn't end up</b> 3 <b>leaving.</b> 4 Q And why didn't you end up leaving? 5 <b>A I don't remember.</b> 6 Q Do you remember who else was in the 7 apartment? 8 <b>A I remember Travis, one of the security</b> 9 <b>guards, was there.</b> 10 Q Anyone else that you can remember? 11 <b>A I don't remember exactly who else was</b> 12 <b>there.</b> 13 Q Is Travis, Travis McGivern? 14 <b>A Correct.</b> 15 Q Do you recall seeing Ms. Heard throw 16 anything at Mr. Depp? 17 <b>A I do not.</b> 18 Q Do you remember Mr. Depp throwing 19 anything at Ms. Heard? 20 <b>A I don't recall.</b> 21 Q Do you remember witnessing any physical 22 violence on that occasion?</p>	<p style="text-align: right;">1398</p> <p>1 (Whereupon, the jury exited the 2 courtroom and the following proceedings took 3 place.) 4 THE COURT: All right. We'll come back 5 at 3:45, then? Okay. Thank you. 6 THE BAILIFF: All rise. 7 (Recess taken from 3:29 p.m. to 8 3:45 p.m.) 9 THE BAILIFF: All rise. Be seated and 10 come to order. 11 THE COURT: All right. Are we ready 12 for the jury? 13 MR. CHEW: Yes, Your Honor. 14 THE COURT: Okay. We're ready for the 15 jury? 16 Thank you. 17 (Whereupon, the jury entered the 18 courtroom and the following proceedings took 19 place.) 20 THE COURT: All right. Thank you. 21 All right. Do you want to continue 22 with the testimony?</p>

1399	1 Thank you. 2 MS. MEYERS: Can you please go back to 3 the nursing notes, which are Exhibit 23. And, 4 specifically, could we go to the entry for 5 March 25th, that starts on DEPP 1736 and goes on 6 to 1737. 7 BY MS. MEYERS: 8 Q Ms. Lloyd, do you see at the bottom 9 here where it says "325"? 10 <b>A Yes.</b> 11 MS. MEYERS: If we can just go to the 12 next page. 13 Q You agree this is a continuation of 14 that note, correct? 15 <b>A Yes.</b> 16 Q Okay. And do you see, under 1330, it 17 says "Patient states pain is 4 out of 10." 18 Do you see that? 19 <b>A I do.</b> 20 Q And what does that reflect? 21 <b>A Pain was being rated at a 4 out of 10</b> 22 <b>out of 10 out of 10.</b>	1401	1 Do you see that? 2 <b>A I do.</b> 3 Q Do you remember this incident? 4 <b>A I do not.</b> 5 Q It says when argument became heated, 6 patient removed himself from situation and had 7 security drive him to another home. 8 Do you see that? 9 <b>A I do.</b> 10 Q I think you just testified you don't 11 remember witnessing this, correct? 12 <b>A I do not.</b> 13 Q But you don't have any reason to doubt 14 the accuracy of what you wrote down in your note, 15 correct? 16 <b>A I do not.</b> 17 Q Had you seen Mr. Depp remove himself 18 from fights before, in this manner? 19 <b>A Yes.</b> 20 MS. MEYERS: Could we please turn to 21 the entry for March 31st, which is on page DEPP 22 1740.
1400	1 Q And then directing your attention down 2 to the entry for March 26th. 3 This is a note that you prepared, yes? 4 <b>A Yes.</b> 5 Q Okay. And just to make sure, I'm not 6 sure I asked, but the prior two notes, those are 7 also notes that you prepared, right? 8 <b>A Correct.</b> 9 Q Now, why don't you take a moment and 10 read through this note, and just let me know when 11 you're done. 12 <b>A Okay.</b> 13 Q Now, the beginning of the notes starts 14 at 0145. 15 Do you see that? 16 <b>A I do.</b> 17 Q And so, again, is that 1:45 in the 18 morning? 19 <b>A Correct.</b> 20 Q It says here "RN called to patient's 21 home. Upon arrival, patient and wife were 22 fighting in the garage."	1402	1 Q Ms. Lloyd, this is also a note you 2 prepared? 3 <b>A It is.</b> 4 Q Do you see the portion that starts 5 "0130, patient continues to c/o pain 10/10, which 6 is causing anxiety and insomnia." 7 Do you see that? 8 <b>A Yes.</b> 9 Q And what does this mean, "plaintiff 10 continues to c/o pain 10/10"? 11 <b>A Complain of.</b> 12 Q And the 10 out of 10 is the pain on the 13 scale that you referenced previously, correct? 14 <b>A Correct.</b> 15 Q Directing your attention down to the 16 portion that starts 1516. It says "At follow-up 17 with surgeon, bandage was removed from skin graft. 18 Graft took a hundred percent but there was an 19 infection under bolster. Finger was drained, pin 20 was removed, and Rocephin 1G was administered 21 during appointment." 22 Did I read that correctly?

1403	1405
<p>1 <b>A Yes.</b></p> <p>2 Q Excuse me if I my pronunciation is</p> <p>3 incorrect.</p> <p>4 Does this reflect that Mr. Depp had the</p> <p>5 bandage from his skin graft on his right middle</p> <p>6 finger removed on this date?</p> <p>7 <b>A Meaning removed at that time or removed</b></p> <p>8 <b>for good?</b></p> <p>9 Q Removed at that time.</p> <p>10 <b>A At that time, that's what that would</b></p> <p>11 <b>mean.</b></p> <p>12 Q And the pin from his finger was also</p> <p>13 removed?</p> <p>14 <b>A According to this.</b></p> <p>15 Q Okay. And when you say "the bandage</p> <p>16 was removed at that time," are you clarifying that</p> <p>17 because another bandage was put on?</p> <p>18 <b>A I don't remember. That's why I was</b></p> <p>19 <b>clarifying.</b></p> <p>20 Q Okay. Do you remember what type of</p> <p>21 bandages Mr. Depp had on his hand at the time?</p> <p>22 <b>A I didn't hear you. What type of</b></p>	<p>1 Q And you returned with him?</p> <p>2 <b>A Correct.</b></p> <p>3 Q And how long did you stay in Australia</p> <p>4 on that trip?</p> <p>5 <b>A I don't recall.</b></p> <p>6 Q I'd like to direct your attention to</p> <p>7 the last page of this document that's marked --</p> <p>8 it's for July 1st.</p> <p>9 Do you see that?</p> <p>10 <b>A Yes.</b></p> <p>11 Q Please take a moment and read through</p> <p>12 this, and just let me know when you're done.</p> <p>13 <b>A I'm done.</b></p> <p>14 Q Okay. This is a note you prepared,</p> <p>15 yes?</p> <p>16 <b>A Correct.</b></p> <p>17 Q And do you remember the events</p> <p>18 reflected in this note?</p> <p>19 <b>A I do not.</b></p> <p>20 Q Directing your attention to the portion</p> <p>21 that starts with 1235. Do you see where it says</p> <p>22 "RN received text from patient's assistant that</p>
1404	1406
<p>1 bandage?</p> <p>2 Q Yes.</p> <p>3 <b>A I don't remember specifics.</b></p> <p>4 Q Was it a hard cast or a soft cast?</p> <p>5 <b>A Soft.</b></p> <p>6 Q Was Mr. Depp's hand -- I'm sorry --</p> <p>7 <b>A I don't recall if it was a cast, but I</b></p> <p>8 <b>know the bandage was soft.</b></p> <p>9 Q Do you recall whether Mr. Depp could</p> <p>10 move the hand that was bandaged?</p> <p>11 <b>A Can, yes. For a while, his finger was,</b></p> <p>12 <b>like, splinted.</b></p> <p>13 Q Could he grab anything with that hand?</p> <p>14 <b>A I remember him pretending he had a</b></p> <p>15 <b>claw. He could do this.</b></p> <p>16 Q Were certain fingers bound together in</p> <p>17 the cast?</p> <p>18 <b>A I don't remember specifics.</b></p> <p>19 Q Mr. Depp eventually returned to</p> <p>20 Australia after the time period we were just</p> <p>21 discussing, correct?</p> <p>22 <b>A Correct.</b></p>	<p>1 the arguments between patient and wife are</p> <p>2 continuing and RN should come to the set to see</p> <p>3 patient"?</p> <p>4 Did I read that correctly?</p> <p>5 I'm sorry, I didn't hear your response.</p> <p>6 <b>A Yes.</b></p> <p>7 Q Okay. Who was the assistant referred</p> <p>8 to there, if you can recall?</p> <p>9 <b>A I don't recall. He had two assistants.</b></p> <p>10 Q And who were they?</p> <p>11 <b>A Stephen and Nathan.</b></p> <p>12 Q Do you recall both of them being in</p> <p>13 Australia?</p> <p>14 <b>A I don't recall if they were both there.</b></p> <p>15 Q Why did they -- why did you</p> <p>16 understand -- strike that.</p> <p>17 Why did you understand that you were</p> <p>18 being called to set?</p> <p>19 MR. NADELHAFT: Objection to hearsay.</p> <p>20 <b>A I don't recall at the time.</b></p> <p>21 Q All right. Directing your attention to</p> <p>22 the last part of this note that says "2100." Says</p>

<p>1407</p> <p>1 here "Between shooting, patient was able to 2 express his feelings to RN. He explained that his 3 wife makes him feel that he could never do 4 anything right and that they cannot have a 5 conversation without her blowing up." 6 Do you see that? 7 <b>A Yes.</b> 8 Q And I think you testified you don't 9 recall having this exchange with Mr. Depp? 10 <b>A Correct.</b> 11 Q It goes on to say, "Patient was given 12 positive reinforcement for expressing his 13 feelings. Patient verbalized he knows it's best 14 for them to take a break from each other when the 15 fights start to escalate, but how she will follow 16 him from room to room when he tries to get away." 17 Do you see that? 18 <b>A I do.</b> 19 Q Have you ever personally observed 20 Mr. Depp try to get away from Ms. Heard and her, 21 then, following him? 22 <b>A Yes.</b></p>	<p>1409</p> <p>1 Mr. Depp? 2 <b>A Yes.</b> 3 Q Now, I think you testified earlier you 4 don't recall the last time you saw Mr. Depp. 5 <b>A Not for sure, no.</b> 6 Q When's the last time that you remember 7 seeing him? 8 <b>A I went to his -- one of his Hollywood 9 Vampire shows out here in the desert.</b> 10 Q Were Mr. Depp and Ms. Heard still in a 11 relationship when you saw Mr. Depp the last time? 12 <b>A No. Not that I was aware of.</b> 13 Q When was the last time you saw 14 Ms. Heard? 15 <b>A I have no idea.</b> 16 Q When's the last time you remember 17 seeing her? 18 <b>A I honestly don't know.</b> 19 Q During the time you were Mr. Depp's 20 nurse, did you ever see Mr. Depp physically abuse 21 Ms. Heard? 22 <b>A No.</b></p>
<p>1408</p> <p>1 Q But you don't recall him telling you in 2 this specific instance? 3 <b>A I do not.</b> 4 Q And, again, you don't have any reason 5 to doubt the accuracy of this note? 6 <b>A I do not.</b> 7 Q This appears to be the last note 8 reflected in this document. 9 Do you see that? 10 <b>A I do.</b> 11 Q And I think you said you don't recall, 12 specifically, when you stopped caring for 13 Mr. Depp, correct? 14 COURT REPORTER: I'm sorry, what was 15 the answer? 16 THE WITNESS: Correct. 17 COURT REPORTER: Sorry. Thank you. 18 Q Do you recall why you stopped providing 19 nursing services to Mr. Depp? 20 <b>A I do not.</b> 21 Q Did you continue to work for Dr. Kipper 22 after you stopped providing nursing services to</p>	<p>1410</p> <p>1 Q If you would have witnessed this, would 2 you have documented it in your nursing notes? 3 <b>A Yes.</b> 4 Q Did you ever see Mr. Depp throw 5 anything at Ms. Heard? 6 <b>A I do not recall ever seeing him throw 7 anything.</b> 8 Q During the time you cared for Mr. Depp, 9 did you ever see Ms. Heard physically abuse 10 Mr. Depp? 11 <b>A No.</b> 12 Q Did you ever see Ms. Heard throw 13 anything at Mr. Depp? 14 <b>A I don't recall.</b> 15 Q In the time that you cared for 16 Mr. Depp, did he ever tell you that Ms. Heard was 17 physically abusive towards him? 18 <b>A I don't recall any conversations like 19 that.</b> 20 Q Were you ever concerned for Mr. Depp's 21 safety around Ms. Heard? 22 <b>A No.</b></p>

<p style="text-align: right;">1411</p> <p>1 Q Were you ever called over by Mr. Depp 2 when he was in a fight with Ms. Heard? 3 <b>A I can't remember if it was when in a 4 fight. I remember being called over after fights.</b> 5 Q And to the extent you know, why were 6 you being called over? 7 <b>A My role with Johnny was medication or 8 emotional support.</b> 9 Q How many times did you travel with 10 Mr. Depp while he was under your care? 11 <b>A Multiple, but I wouldn't – I don't 12 know a specific number.</b> 13 Q Did you ever witness Mr. Depp and 14 Ms. Heard get in arguments while you were 15 traveling? 16 <b>A Yes.</b> 17 Q And what would Mr. Depp do in those 18 circumstances? 19 <b>A I don't remember specifics, other than 20 the one time I mentioned on the airplane.</b> 21 Q Did Mr. Depp ever book a separate room 22 to separate himself from Ms. Heard?</p>	<p style="text-align: right;">1413</p> <p>1 MS. MEYERS: And just for the record, 2 this is a document bearing the Bates number DEPP 3 7804 through 7848. 4 AV TECHNICIAN: Exhibit 28. 5 Q Ms. Lloyd, these are -- I'll represent 6 that these are text messages between you and 7 Mr. Depp. I think you've seen some of -- some 8 portions of this document when you were answering 9 Mr. Nadelhaft's questions. But I'd like to just 10 direct your attention specifically to messages 11 between you and Mr. Depp on May 27th, 2015, which 12 appear on page 7841 and go through to 7843. 13 AV TECHNICIAN: Sorry, Counsel, was 14 there an instruction? 15 MS. MEYERS: Yeah. I'm sorry. Can you 16 please go to the page 7841, and we're going to be 17 scrolling through the pages after that. 18 Go up two pages. Yeah. 19 Q Do you see the text message that starts 20 in row 320? 21 <b>A Yes.</b> 22 Q Okay. So I would like you to, please,</p>
<p style="text-align: right;">1412</p> <p>1 <b>A I don't recall.</b> 2 Q Have you ever witnessed Ms. Heard lose 3 her temper? 4 <b>A I don't recall specifics.</b> 5 Q What do you recall, generally? 6 <b>A I can't recall.</b> 7 Q In the time you treated Mr. Depp, did 8 you ever suspect he was under the influence of 9 alcohol? 10 <b>A I don't recall specific times being of 11 concern.</b> 12 Q Do you recall any specific instances 13 when you were concerned he was under the influence 14 of drugs that had not been prescribed by one of 15 his physicians? 16 <b>A I don't recall.</b> 17 Q Did Mr. Depp ever tell you that someone 18 had taken his prescription drugs? 19 <b>A I don't recall a conversation.</b> 20 MS. MEYERS: Could we pull up 21 Exhibit I, please. 22 AV TECHNICIAN: Please stand by.</p>	<p style="text-align: right;">1414</p> <p>1 read through the text messages in row 320 through 2 337, which are from May 27th, 2015. And before 3 you begin, I just want to confirm this number 4 under participants, next to your name. 5 That's your phone number? 6 <b>A Yeah. But I'm looking below, I was 7 like, no. But above, yes.</b> 8 Q All right. So if you could read 9 through the text messages reflected in rows 320 10 through 337 and then just let me know when you're 11 done. 12 <b>A Okay. I'm done to 322. Okay. I'm 13 done through 330.</b> 14 Q Are you done through 337? 15 <b>A Yeah. I've read everything.</b> 16 Q Okay. Do you recall this exchange with 17 Mr. Depp? 18 <b>A I do not.</b> 19 Q Do you have an understanding of what 20 you and Mr. Depp were discussing? 21 <b>A I mean, just from what the text 22 messages says. I can see what he was saying.</b></p>

1415	1 Q And what was Mr. Depp saying? 2 A <b>That his as-needed medications were</b> 3 <b>missing.</b> 4 Q Anything else about how they came to be 5 missing? 6 A <b>I really don't remember what the above</b> 7 <b>text stated.</b> 8 Q Okay. Let's go to the text that's in 9 row 33 please -- or 333, please. And it says here 10 "Saw them. She wiped me out of everything. Need 11 Adderall in the PRNs. I don't like to be out of 12 stuff on the just-in-case kind of deal. I can't 13 believe she's got the balls to flat out steal my 14 meds for her fucking debaucheries. Hard game. 15 After all, she is the sister. X. Me." 16 Do you see that? 17 MR. NADELHAFT: Objection. 18 Q Do you have any understanding as to 19 what Mr. Depp was referring to there? 20 A <b>I do not.</b> 21 Q Do you know who he's referring to when 22 he says "She is the sister"?	1417	1 around? 2 A <b>I do not.</b> 3 Q Was Ms. Heard unfriendly toward you? 4 A <b>No.</b> 5 Q Did Ms. Heard ever get angry at you in 6 your presence? 7 A <b>Not that I recall.</b> 8 Q So, just to be clear. Your 9 understanding that Ms. Heard's feelings towards 10 you changed is based off of what you heard from 11 other people, correct? 12 A <b>Yes.</b> 13 Q And your understanding was that you 14 said she didn't want you around, correct? 15 A <b>Yes.</b> 16 <b>BY MR. NADELHAFT:</b> 17 Q Mr. Depp is your patient, correct? 18 A <b>Correct.</b> 19 Q And Amber Heard was not your patient; 20 was that right? 21 A <b>Correct.</b> 22 Q You talked about before, I believe,
1416	1 A <b>I do not.</b> 2 Q How did Ms. Heard treat you when you 3 first started caring for Mr. Depp? 4 A <b>She was accepting.</b> 5 Q Did that ever change in the time you 6 treated Mr. Depp? 7 A <b>I felt it did.</b> 8 Q You felt that, at some time, 9 Ms. Heard's demeanor towards you changed, correct? 10 A <b>Yes.</b> 11 Q Okay. When do you recall her demeanor 12 changing? 13 A <b>I don't recall specifically.</b> 14 Q How did her treatment of you change? 15 A <b>It wasn't so much her treatment of me,</b> 16 <b>of me hearing that she didn't want me around from</b> 17 <b>other members.</b> 18 Q Who did you hear that from? 19 A <b>I don't recall specifics. It was from</b> 20 <b>other staff people that we worked with.</b> 21 Q Did you understand -- do you have any 22 understanding as to why she didn't want you	1418	1 that one of your roles for Mr. Depp was providing 2 him emotional support. 3 Did I recall that correctly? 4 A <b>Yes.</b> 5 Q You didn't have that role for Amber 6 Heard, correct? 7 A <b>Correct.</b> 8 Q Okay. One of the exhibits I saw was 9 Exhibit, I believe, Lloyd 22. There was a 10 reference to polysubstance abuse. 11 What is that? 12 A <b>Polysubstance abuse is used to</b> 13 <b>determine the use of different drugs and/or</b> 14 <b>alcohol.</b> 15 Q So it's abusing more than one drug or 16 alcohol; is that right? 17 A <b>That's what the term means, yes.</b> 18 Q Okay. So, Ms. Lloyd, it would be the 19 March 27, 2015 entries. 20 A <b>Okay.</b> 21 Q Can you see the entry for 1300? 22 A <b>Yes.</b>



1419	1 Q You wrote "Patient was having a hard 2 time leaving the house, so security suggested the 3 MD and RN go to the house to see patient. Upon 4 arrival at the house, patient was sitting in the 5 car ready to leave. MD assessed patient's finger 6 and will spend more time with the patient at the 7 location he's being moved to." 8 You wrote that? 9 A I did. 10 Q And you wrote that based off of 11 information you were provided? 12 A I don't recall what that first sentence 13 is regarding. 14 Q You don't have any reason to question 15 the accuracy of the statement? 16 A I do not. 17 Q Okay. Even then, at 11:30, the bottom 18 entry, you had testified a bit to that. After the 19 highlighted portion, it says "MD offered patient 20 Valium 10 milligrams IM to help with his anxiety 21 and anger, but patient refused." 22 You wrote that?	1421	1 that is staying with his wife at their rented 2 house. Patient is discussing wanting to go home 3 to LA tomorrow and rehashing night. Patient's 4 personal security guard came to stay with patient. 5 RN will be next door and instructed security to 6 call during the night if needed." 7 You wrote that? 8 A Correct. 9 Q Do you know what you meant by "patient 10 is discussing wanting to go home to LA tomorrow 11 and rehashing night"? 12 A I do not recall what that's referring 13 to. 14 Q I believe you testified, way in the 15 beginning, that you are -- you go to Dr. Kipper as 16 a patient; is that right? 17 A Correct. 18 Q Not going into details, but how long 19 have you been his patient? 20 A Since before I went to nursing -- early 21 2000s. 22 Q Okay. And do you consider Dr. Kipper
1420	1 A I did. 2 Q Okay. And you have no reason to 3 question the accuracy of that? 4 A I do not. 5 Q Okay. Was Mr. Depp expressing any -- 6 do you recall Mr. Depp expressing any anger? 7 A Only what I see I referred to earlier 8 in that note, the portion that was highlighted. 9 Q Okay. Then you -- then it's 10 highlighting those -- going to the next page, 11 "Patient was talking about wanting to drink 12 alcohol but did not obtain any." 13 You wrote that? 14 A I did. 15 Q And that was based off of what you saw 16 with Mr. Depp? 17 A According to this, yes. 18 Q Okay. And there's no reason to 19 question the accuracy of that note? 20 A Correct. 21 Q Okay. And then 3/8/15, 1:45, you write 22 "Patient has been on phone with his security guard	1422	1 to be a friend? 2 A Yes. 3 EXAMINATION BY COUNSEL FOR THE PLAINTIFF AND 4 COUNTERCLAIM DEFENDANT 5 BY MS. MEYERS: 6 Q When you were with Mr. Depp in 7 Australia, was he drinking at that time? 8 A I don't recall him drinking. 9 Q Do you recall that he was specifically 10 abstaining from drinking during that time? 11 A I don't recall. 12 Q Did you ever see Ms. Heard drink in 13 front of Mr. Depp while he was abstaining from 14 alcohol? 15 A Yes. 16 Q Did you ever -- did he ever ask her not 17 to do that, to your knowledge? 18 A Not to my knowledge. 19 THE COURT: All right. Your next 20 witness. 21 MR. CHEW: Yes, Your Honor. Mr. Depp 22 calls Sean Bett.

<p>1423</p> <p>1 THE COURT: How did you spell the last 2 name, I'm sorry? 3 MR. CHEW: B-E-T-T. 4 THE COURT: B-E-T-T. 5 MR. CHEW: Thank you. 6 THE COURT: Uh-huh. 7 JOSHUA SEAN BETT 8 A witness called on behalf of the 9 Plaintiff and Counterclaim Defendant, having been 10 first duly sworn by the Clerk, testified as 11 follows: 12 EXAMINATION BY COUNSEL FOR THE PLAINTIFF AND 13 COUNTERCLAIM DEFENDANT 14 BY MS. VASQUEZ: 15 Q Good afternoon, Mr. Bett. 16 A Good afternoon. 17 Q Will you please state your name for the 18 record. 19 A Joshua Sean Bett. 20 Q Mr. Bett, what is your occupation? 21 A I'm currently security with Johnny 22 Depp. 23 Q And your current employer is Mr. Depp?</p>	<p>1425</p> <p>1 certain areas within our district on gang 2 shootings and things of that nature. Then after 3 that, I was assigned to gang units, where I 4 performed search warrants and things of that 5 nature; worked with homicide, worked with special 6 enforcement bureaus to combat a lot of the crime 7 that was taking place in our area. 8 Q Did it come to a point where your 9 employment with the Los Angeles Sheriff's 10 Department came to an end? 11 A It did. 12 Q How did that come about? 13 A I was in a couple of really bad traffic 14 collisions and during the course of duties, the 15 County of Los Angeles issued a, what they call a 16 medical retirement or discharge. And so, I was 17 kind of forced out, based on my injuries. 18 Q And after you left the Los Angeles 19 Sheriff's Department, what did you do next? 20 A I was doing some private investigations 21 and I also was doing security, estate security at 22 various residences and offices, and working with</p>
<p>1424</p> <p>1 A That's correct. 2 Q And how long have you been in private 3 security? 4 A Approximately just over 20 years. 5 Q Prior to working in private security, 6 what were you doing professionally? 7 A I was with the Los Angeles County 8 Sheriff's Department. 9 Q And how long were you with the LA 10 County Sheriff's Department? 11 A Just over 14 years. 12 Q Over those 14 years, would you, please, 13 describe for the jury your responsibilities in 14 each position you held with the LA County 15 Sheriff's Department? 16 A Yes, I was assigned the custody 17 division, where we handled the intake and outtake 18 of inmates. Then I was assigned to patrol 19 division, where I was assigned to crime units 20 where we were – did calls for service, proactive, 21 reactive arrests. After that, I was assigned to 22 gang details, where we focused and saturated in</p>	<p>1426</p> <p>1 different executives on certain details. 2 Q And when you were doing estate 3 security, did you work with a certain clientele? 4 A I did. 5 Q What type of clientele? 6 A It ranged from CEOs, VPs of Fortune 500 7 companies to certain types of celebrity as well. 8 Q How did you come to be employed by 9 Mr. Depp? 10 A During the course of working the estate 11 security and the type of private security, you 12 come in contact with a lot of other individuals in 13 security companies. What we like to call 14 networking. So when you network with a lot of 15 individuals, they call you, from time to time, to 16 ask you if you're available to work certain days, 17 weeks, events, and things of that nature. So I 18 was asked, by an individual, if I wanted to work 19 the estate of Mr. Depp, and I, of course, said yes 20 on a part-time basis, at the time. 21 Q And where is Mr. Depp's estate? 22 A It's in West Hollywood; it borders</p>

1427	<p>1 <b>West Hollywood and the City of LA.</b></p> <p>2 Q And approximately what year was that?</p> <p>3 A <b>That was at the end of either 2006,</b></p> <p>4 <b>into the beginning of 2007, around that time.</b></p> <p>5 Q And since 2006/2007, have you been</p> <p>6 employed exclusively by Mr. Depp?</p> <p>7 A <b>I have. I have done other work over</b></p> <p>8 <b>the years on a part-time basis with other firms,</b></p> <p>9 <b>but, primarily, within the last, I'd say, six to</b></p> <p>10 <b>eight years, it's been with Mr. Depp and his</b></p> <p>11 <b>family.</b></p> <p>12 Q And would you, please, describe, for</p> <p>13 the jury, your general job responsibilities when</p> <p>14 you first started working for Mr. Depp?</p> <p>15 A <b>It was mostly estate security. So we</b></p> <p>16 <b>controlled the, you know, people that arrived at</b></p> <p>17 <b>the estate. We were there to monitor the streets</b></p> <p>18 <b>to make sure there were no overzealous fans or</b></p> <p>19 <b>paparazzi that would hop fences or try to sneak in</b></p> <p>20 <b>bushes and take pictures of the family. And it</b></p> <p>21 <b>also entailed taking the kids or the kids' mother</b></p> <p>22 <b>to school or shopping or out to dinner. Things of</b></p>	1429	<p>1 THE COURT: I'll sustain the objection.</p> <p>2 We can move on.</p> <p>3 MS. VASQUEZ: Okay.</p> <p>4 Q Over the years, Mr. Bett, have your</p> <p>5 responsibilities evolved over the years as you</p> <p>6 provided protection for Mr. Depp and his family?</p> <p>7 A <b>It has.</b></p> <p>8 Q How so?</p> <p>9 A <b>I started to travel a little bit more</b></p> <p>10 <b>with him out of state, and then eventually out of</b></p> <p>11 <b>the country and worldwide.</b></p> <p>12 Q Did your interactions with Mr. Depp</p> <p>13 also evolve from beginning to now?</p> <p>14 A <b>They did. I was around him quite a bit</b></p> <p>15 <b>when he was in town. In the very beginning of my</b></p> <p>16 <b>employment with him, he was doing a lot of movies,</b></p> <p>17 <b>he was out of the state, he was out of the country</b></p> <p>18 <b>a lot. So once he was back in town, if I wasn't</b></p> <p>19 <b>with his children, taking them around to school</b></p> <p>20 <b>and so forth, I would be around Mr. Depp and</b></p> <p>21 <b>provide, you know, security for him when he went</b></p> <p>22 <b>out and about in public and so forth.</b></p>
1428	<p>1 <b>that nature.</b></p> <p>2 Q And when you say "the kids," do you</p> <p>3 mean Mr. Depp's children?</p> <p>4 A <b>I do.</b></p> <p>5 Q And who was their mother?</p> <p>6 A <b>Vanessa Paradis.</b></p> <p>7 Q Based on your observations, Mr. Bett,</p> <p>8 would you, please, describe what it was like</p> <p>9 working for Mr. Depp in the beginning?</p> <p>10 A <b>When I first met him –</b></p> <p>11 THE COURT: Objection. What?</p> <p>12 MR. ROTTENBORN: Vague.</p> <p>13 THE COURT: The foundation, I guess.</p> <p>14 What are we talking about? Is that what you</p> <p>15 asked? Put your microphone on.</p> <p>16 MR. ROTTENBORN: Vague. Foundation.</p> <p>17 THE COURT: Vague.</p> <p>18 MR. ROTTENBORN: Also, just relevance.</p> <p>19 What was it like working for him?</p> <p>20 THE COURT: What's the relevance?</p> <p>21 MS. VASQUEZ: The relevance is, Your</p> <p>22 Honor, just background, just to understand.</p>	1430	<p>1 Q Would you, please, describe, for the</p> <p>2 jury, your general access to Mr. Depp while</p> <p>3 providing security for him?</p> <p>4 A <b>I had access to him at any given time.</b></p> <p>5 <b>He had an open-door policy. I had access to his</b></p> <p>6 <b>residence, the inside, all the rooms, at any given</b></p> <p>7 <b>time in the event there was an emergency or</b></p> <p>8 <b>anything like that.</b></p> <p>9 Q And when traveling with Mr. Depp, was</p> <p>10 the access the same?</p> <p>11 A <b>It was. I have access to his hotel</b></p> <p>12 <b>room, again, if there's an emergency. I have –</b></p> <p>13 <b>you know, wherever he's at, I make sure, and it's</b></p> <p>14 <b>mandatory that I and other security personnel have</b></p> <p>15 <b>access to him.</b></p> <p>16 Q And would you, please, describe, for</p> <p>17 the jury, your current job responsibilities?</p> <p>18 A <b>Basically to provide security for him</b></p> <p>19 <b>and his well-being. Albeit if he's in a hotel,</b></p> <p>20 <b>residence, or when he's out and about in public.</b></p> <p>21 Q Has your job title changed from the</p> <p>22 beginning to now?</p>

1431	<p>1 <b>A Yes. I primarily, now, just work with</b> 2 <b>Mr. Depp, not so much with his children anymore.</b> 3 <b>So I guess you could say for lack -- for a term,</b> 4 <b>you know, when we're in the United States, you</b> 5 <b>know, I'm kind of his lead security guy.</b> 6 <b>Q Are there other members of Mr. Depp's</b> 7 <b>security team?</b> 8 <b>A There are.</b> 9 <b>Q And would you, please, name some of</b> 10 <b>those security members?</b> 11 <b>A That would be Malcolm Connolly, who</b> 12 <b>primarily does his European security, although he</b> 13 <b>does come from the States from time to time.</b> 14 <b>Leonard Damian, Mark Gibbs, Travis McGivern,</b> 15 <b>Starling Jacobs.</b> 16 <b>Q Who is Jerry Judge?</b> 17 <b>A Jerry Judge used to be his chief</b> 18 <b>security individual. He was with him well over</b> 19 <b>20 years, I believe, and we lost him a few years</b> 20 <b>ago to cancer.</b> 21 <b>Q Over the course of your employment with</b> 22 <b>Mr. Depp, have you seen him consume alcohol?</b></p>	1433	<p>1 intoxicated? 2 <b>A It's the same as if he, you know, had a</b> 3 <b>glass of sparkling water. I mean, he's just very</b> 4 <b>low key, easy to get along with and, you know, he</b> 5 <b>just seems to me, I mean, he handles alcohol a lot</b> 6 <b>better than I would.</b> 7 <b>Q And over the course of your employment</b> 8 <b>with Mr. Depp, have you ever seen him consume</b> 9 <b>drugs?</b> 10 <b>A I haven't.</b> 11 <b>Q Are you generally aware that Mr. Depp</b> 12 <b>has used drugs over the years?</b> 13 <b>A I am.</b> 14 <b>Q And how are you aware of that?</b> 15 <b>A From him.</b> 16 <b>Q Do you know who Ms. Heard is?</b> 17 <b>A I do.</b> 18 <b>Q Who is Ms. Heard?</b> 19 <b>A She's Mr. Depp's ex-spouse.</b> 20 <b>Q When did you first meet Ms. Heard?</b> 21 <b>A Probably it would have been around</b> 22 <b>2011, '12 maybe, maybe around 2010. It was some</b></p>
1432	<p>1 <b>A I have.</b> 2 <b>Q How frequently?</b> 3 <b>A It ranged. Sometimes I wouldn't see</b> 4 <b>him drink at all and there'd be other times he'd,</b> 5 <b>you know, would have a glass of wine or two.</b> 6 <b>Q And based on your observations, how</b> 7 <b>would you describe Mr. Depp's demeanor after</b> 8 <b>drinking alcohol?</b> 9 <b>A His demeanor is the same as if you were</b> 10 <b>talking to him. I would joke around with some of</b> 11 <b>the other security personnel. He's, you know, my</b> 12 <b>terminology would be he's kind of too cool for</b> 13 <b>school. He goes into that kind of Jack Sparrow</b> 14 <b>mode and he's just, you know, very likeable,</b> 15 <b>whether he drinks or he doesn't drink.</b> 16 <b>Q Based on your observations, have you</b> 17 <b>ever seen Mr. Depp appear intoxicated?</b> 18 <b>MR. ROTTENBORN: Objection. Leading.</b> 19 <b>THE COURT: Overruled. I'll allow it.</b> 20 <b>A I've seen him slightly intoxicated.</b> 21 <b>Q And based on your observations, what is</b> 22 <b>Mr. Depp's demeanor like when he appears slightly</b></p>	1434	<p>1 <b>time ago.</b> 2 <b>Q And how did you first meet her?</b> 3 <b>A She came over to his Hollywood estate.</b> 4 <b>Q And would you, please, describe, for</b> 5 <b>the jury, some of your early interactions with</b> 6 <b>Ms. Heard?</b> 7 <b>A She was very pleasant, very easy to get</b> 8 <b>along with. I mean, she was almost as if she was</b> 9 <b>a next-door neighbor. Just always had a smile to</b> 10 <b>her face and just, you know, just no issues at the</b> 11 <b>time and, you know, I liked her. Liked her a lot.</b> 12 <b>Q In the early days of Mr. Depp and</b> 13 <b>Ms. Heard's relationship, did you have an</b> 14 <b>opportunity to observe them together?</b> 15 <b>A I did.</b> 16 <b>Q How frequently?</b> 17 <b>A In the early stages, it was kind of on</b> 18 <b>a part-time basis because a lot of times, you</b> 19 <b>know, he was traveling or he was out of town</b> 20 <b>working on films and so forth. When they were in</b> 21 <b>LA, I saw them quite frequently, which could have</b> 22 <b>been the days that I work, which varied anywhere</b></p>

1435	<p>1 <b>between four, five, six days a week.</b></p> <p>2 Q And based on what you observed of them</p> <p>3 together, how would you describe Ms. Heard's</p> <p>4 relationship with Mr. Depp when they first started</p> <p>5 seeing each other?</p> <p>6 THE COURT: Yes.</p> <p>7 MR. ROTTENBORN: Objection.</p> <p>8 Foundation.</p> <p>9 THE COURT: All right. Foundation.</p> <p>10 MS. VASQUEZ: Your Honor, I believe</p> <p>11 I've laid the foundation that he saw them</p> <p>12 frequently together when they first started</p> <p>13 dating.</p> <p>14 THE COURT: Sir.</p> <p>15 MR. ROTTENBORN: How he would describe</p> <p>16 their relationship is --</p> <p>17 THE COURT: All right. I'll sustain</p> <p>18 the objection. Next question.</p> <p>19 Q After Mr. Depp and Ms. Heard started a</p> <p>20 romantic relationship, did you become familiar</p> <p>21 with any of Ms. Heard's family or friends?</p> <p>22 <b>A I did.</b></p>	1437	<p>1 Ms. Depp?</p> <p>2 <b>A I did. They were obviously very</b></p> <p>3 <b>pleasant to him because, you know, I, from</b></p> <p>4 <b>observing, they were taking advantage of him. So</b></p> <p>5 <b>they were being, obviously, extra nice to the hand</b></p> <p>6 <b>that feeds them. And that just progressed over a</b></p> <p>7 <b>period of time.</b></p> <p>8 Q How did Ms. Heard interact with you?</p> <p>9 THE COURT: Yes.</p> <p>10 MR. ROTTENBORN: Objection. Relevance.</p> <p>11 THE COURT: All right. What's the</p> <p>12 relevance?</p> <p>13 MS. VASQUEZ: It's just background,</p> <p>14 Your Honor.</p> <p>15 THE COURT: I'll sustain the objection.</p> <p>16 We can move on.</p> <p>17 MS. VASQUEZ: Okay.</p> <p>18 Q Were you ever present, Mr. Bett, for</p> <p>19 any conversations amongst Ms. Heard and her</p> <p>20 friends?</p> <p>21 <b>A I was.</b></p> <p>22 Q Can you describe any particular one</p>
1436	<p>1 Q Which ones?</p> <p>2 <b>A Her sister, Whitney Heard, her good</b></p> <p>3 <b>friend, Raquel, or Rocky Pennington, another</b></p> <p>4 <b>friend, iO Tillett Wright.</b></p> <p>5 <b>Ms. Pennington's boyfriend at the time,</b></p> <p>6 <b>Josh Drew.</b></p> <p>7 Q And did you have an opportunity to</p> <p>8 observe Mr. Depp's interactions with Ms. Heard's</p> <p>9 family and friends?</p> <p>10 <b>A I did.</b></p> <p>11 Q And how would you generally describe</p> <p>12 their interactions?</p> <p>13 <b>A He was very open and warm to them. He,</b></p> <p>14 <b>you know, offered them, you know, whatever they</b></p> <p>15 <b>needed. They were constantly coming around the</b></p> <p>16 <b>estate. You know, eventually he let a couple of</b></p> <p>17 <b>them live in his penthouses downtown for free. He</b></p> <p>18 <b>would let them, a few of them, drive his nice</b></p> <p>19 <b>Dodge Challenger in and around town and take on</b></p> <p>20 <b>trips.</b></p> <p>21 Q Did you have any opportunity to observe</p> <p>22 how Ms. Heard's friends and family treated</p>	1438	<p>1 that stands out to you?</p> <p>2 MR. ROTTENBORN: Objection, Your Honor.</p> <p>3 Leading. Calls for hearsay.</p> <p>4 THE COURT: All right.</p> <p>5 MS. VASQUEZ: Well, to the extent, Your</p> <p>6 Honor, we're offering Ms. Heard's statements, it's</p> <p>7 not hearsay.</p> <p>8 THE COURT: All right. If you can lay</p> <p>9 a foundation to that, we'll see where we go.</p> <p>10 Q Do you recall any specific instances,</p> <p>11 Mr. Bett, where you heard Ms. Heard say something</p> <p>12 to her friends?</p> <p>13 <b>A I do.</b></p> <p>14 Q Okay. Can you describe one of those</p> <p>15 situations?</p> <p>16 <b>A Yes. The first one, I was taking her</b></p> <p>17 <b>from Mr. Depp's property to her apartment in the</b></p> <p>18 <b>south end of the city, that I believe Mr. Depp was</b></p> <p>19 <b>paying for. She was sitting next to me in the</b></p> <p>20 <b>vehicle. She was talking to a girlfriend, or a</b></p> <p>21 <b>friend, where they were talking about another</b></p> <p>22 <b>male. And she says to the friend, girlfriend,</b></p>

1439	1 whoever she was talking to, you know, "All men are 2 idiots. You shouldn't trust that guy." 3 And then she turned to me and she said, 4 "Sorry, Sean, not you. I didn't mean that." And 5 I just shrugged it off like it's not a big deal. 6 Q Do you remember, approximately, when 7 that conversation took place? 8 A I would say probably, maybe, 2012 or 9 '13, perhaps. Perhaps even a little bit sooner 10 than that. It was a long time ago. 11 Q And over the years of Ms. Heard's and 12 Mr. Depp's relationships, did you have an 13 opportunity to observe how the relationship 14 evolved? 15 A I did. 16 MR. ROTTENBORN: Objection. 17 Foundation. 18 THE COURT: I'll see what the next 19 question is. That's fine. 20 MS. VASQUEZ: Thank you. 21 Q Did you notice any changes in the 22 relationship between Mr. Depp and Ms. Heard?	1441	1 A I did. 2 Q How often? 3 A It just varied. There would be, you 4 know, some days when I was working that I would 5 see her. There would be other days I didn't see 6 her, she was out of town working. So it just 7 really depended on when she was around. And when 8 she was around, for the most part, you know, she 9 was drinking. Sometimes I'd see a glass in her 10 hand and sometimes I'd see her, you know, have two 11 glasses, if I was in the presence of her and 12 Mr. Depp, obviously. 13 Q Based on your observations, did it ever 14 appear that Ms. Heard was intoxicated? 15 A There were times when I went into the 16 penthouse or we were at the Hollywood estate and, 17 you know, based on my training and experience in 18 law enforcement, I could tell she was slightly 19 intoxicated. 20 MR. ROTTENBORN: Objection, Your Honor. 21 THE COURT: Excuse me. 22 MR. ROTTENBORN: That's kind of getting
1440	1 MR. ROTTENBORN: Objection. Vague. 2 Foundation. Relevance. And leading. 3 THE COURT: Well, I'll allow it if you 4 can get a timeline set in there, okay? Thank you. 5 MS. VASQUEZ: Thank you, Your Honor. 6 Q Did you notice any changes in the 7 relationship between Mr. Depp and Ms. Heard after 8 the initial stages of them beginning to engage in 9 a romantic relationship? 10 A I did. 11 Q And would you, please, describe those 12 changes that you observed? 13 A Well, I noticed they went from being 14 that loving, almost like high school couple, where 15 they were very giddy towards each other. He was 16 very happy, she was very happy, to they started to 17 argue. They started to argue periodically and 18 then the arguing started to progress more and more 19 and more, and it was always taking place because, 20 you know, Ms. Heard would start this argument. 21 Q Did you ever observe Ms. Heard drink 22 alcohol?	1442	1 into the realm of expert testimony. He's not a 2 designated expert. 3 THE COURT: All right. 4 MS. VASQUEZ: Perhaps we can have him 5 answer the question without citing to any 6 experience in law enforcement, Mr. Bett. 7 THE COURT: I'll sustain the objection. 8 Let's go to the next question. 9 MS. VASQUEZ: Okay. Understood. 10 Q Do you recall observing any arguments 11 between Mr. Depp and Ms. Heard? 12 A Several. 13 Q Can you tell the jury about one that 14 comes to mind? 15 A There was an incident, for example, I 16 just happened to be in the floor of their 17 penthouse, which is on the top floor of this 18 building, I was outside by the pool area reading a 19 book, and when I was walking back past their door, 20 I could hear shouting. I could hear her voice 21 shouting, you know, at a very high pitch. So I 22 didn't rush in right away or anything. I just

1443

1 kind of stood by the door. He was, you know,  
2 speaking with her and then the voices, you know,  
3 the shouting had dissipated and then, you know,  
4 there was music playing, and then they started  
5 talking. So I kind of just stood by the door,  
6 briefly, and then I went into another section of  
7 the penthouse floor.  
8 Q Do you recall, approximately, the time  
9 frame of that argument?  
10 A As far as the year or how long it  
11 lasted?  
12 Q I'm sorry. Thank you, Mr. Bett.  
13 The year.  
14 A That could have been, perhaps, 2012,  
15 2013, maybe a little thereafter.  
16 Q Did Ms. Heard ever confide in you about  
17 her relationship with Mr. Depp?  
18 A Briefly.  
19 Q Do you recall her saying anything in  
20 particular about her relationship with Mr. Depp?  
21 A Well, there were a couple of occasions.  
22 There was one occasion in which they had an

1444

1 argument at his West Hollywood address. Johnny  
2 told me, you know, just take her downtown to the  
3 penthouse so she can relax and cool off.  
4 As we were driving downtown, you know,  
5 she was crying, this was at the point when the  
6 arguing was taking place quite frequently, and I  
7 was telling her, I go, I said, Amber, you know,  
8 this can't continue. You guys are either going to  
9 kill each other or you're going to be in jail.  
10 And, you know, with tears and everything, she  
11 says, but I love him and I'm not going to lose  
12 him. I said, but you guys can't keep doing this.  
13 So we eventually got to the downtown apartments,  
14 you know, she said thank you, I dropped her off,  
15 and then I went back to the West Hollywood  
16 address.  
17 Q What did you mean by, you know, "this  
18 can't continue," when you told Ms. Heard that?  
19 A The constant arguing and bickering and  
20 so forth. Because, as I said, it was slowly  
21 progressing and, you know, it was just going to  
22 turn out bad, eventually.

1445

1 Q I believe you testified earlier that  
2 you observed many arguments between Mr. Depp and  
3 Ms. Heard.  
4 Do you recall anything that Ms. Heard  
5 said to Mr. Depp while they were arguing?  
6 A There was an incident, because, as I  
7 said, the arguing progressed over and over as the  
8 years continued. He would text me when I was  
9 working saying, you know –  
10 MR. ROTTENBORN: Objection, Your Honor.  
11 Calls for hearsay.  
12 THE COURT: All right. I'll sustain  
13 that objection.  
14 Q Mr. Bett, if you could, just focus on  
15 Ms. Heard, what you overheard Ms. Heard say while  
16 observing arguments between Mr. Depp and  
17 Ms. Heard.  
18 A I overheard her saying to him he's a fat  
19 ass, fuck you, Johnny, and you too, Sean. At one  
20 time, when she went to throw a water bottle or a  
21 plastic cup down the stairs and it bounced kind of  
22 in Johnny's direction, but I ended up getting him

1446

1 and we, you know, got out of there as soon as  
2 possible.  
3 Q Did you ever see Ms. Heard throw  
4 anything other than a water bottle?  
5 A It was a water bottle or a coffee cup.  
6 It was something plastic.  
7 Q Other than a water bottle or a plastic  
8 cup, did you ever see Ms. Heard throw anything  
9 else?  
10 A No, other than what he told me she  
11 threw a broken bottle –  
12 MR. ROTTENBORN: Objection, Your Honor.  
13 THE COURT: Sir. Sustain the  
14 objection. The jury will strike that testimony.  
15 Please, just answer the question asked,  
16 and when there's objection, do not speak, okay?  
17 THE WITNESS: All right. I'm sorry,  
18 Your Honor.  
19 THE COURT: Thank you.  
20 Q After observing several arguments  
21 between Mr. Depp and Ms. Heard, what happened  
22 next?

1447	<p>1 A As far as a time frame? Well, as I 2 said, the arguing, when it continued, we would 3 always, you know, I'd put him in the car and we 4 would drive back to his West Hollywood address, at 5 which point it just depended on the week, the day, 6 or the month. You know, they would reconcile 7 within hours or might take a day where he would 8 stay overnight at his West Hollywood address and 9 then, you know, I would take him back the next day 10 and, you know, they would reconcile by, you know, 11 talking and she would have, you know, candles lit 12 or, you know, a bottle of wine open with glasses 13 and, you know, within, you know, certain evenings, 14 you know, I'd get a text message from her, you 15 know, asking me to go pick up dinner at local 16 restaurants they frequented. 17 Q Did you ever see any violence between 18 Ms. Heard and Mr. Depp? 19 A No. 20 Q Other than the occasion when you saw 21 Ms. Heard throw something plastic in Mr. Depp's 22 direction, did you ever see Ms. Heard hit</p>	1449	<p>1 A No. 2 Q How about on Mr. Depp? 3 A Yes. 4 Q When did you observe injuries on 5 Mr. Depp? 6 A The first time would have been around 7 2014, I guess, in which he had a – his finger was 8 damaged from an incident in Australia. 9 Q Do you know how Mr. Depp's finger was 10 damaged? 11 MR. ROTTENBORN: Objection. 12 Foundation. 13 THE COURT: Foundation. 14 MS. VASQUEZ: It's just background. If 15 he knows. 16 THE COURT: I'll sustain the objection. 17 Unless he was in Australia and saw it himself. 18 MS. VASQUEZ: Okay. 19 THE COURT: Okay. 20 Q When else did you see injuries on 21 Mr. Depp? 22 A I saw another injury around, it would</p>
1448	<p>1 Mr. Depp? 2 A No. 3 Q Did you ever see any physical injuries 4 on Ms. Heard? 5 A I didn't. 6 Q Did you ever see any physical injuries 7 on Ms. Heard on occasions after Mr. Depp and 8 Ms. Heard argued? 9 MR. ROTTENBORN: Objection, Your Honor. 10 Foundation. 11 THE COURT: All right. You want to lay 12 a time frame to that? 13 MS. VASQUEZ: Absolutely. 14 Q On the occasions where you witnessed 15 Ms. Heard and Mr. Depp argue, after that, did you 16 ever see any physical injuries on Ms. Heard? 17 THE COURT: That's the same question. 18 MS. VASQUEZ: I'll move on. 19 THE COURT: Okay. 20 Q At any point during Ms. Heard's and 21 Mr. Depp's relationship, did you ever see any 22 injuries on Ms. Heard?</p>	1450	<p>1 have been March of 2015. He had a swollen kind of 2 cheekbone, eyelid. 3 MS. VASQUEZ: Your Honor, if I may, 4 please, pull up a photograph, Exhibit Number 146. 5 THE COURT: Just to the witness? 6 MS. VASQUEZ: Just for the witness, 7 that's correct. 8 THE COURT: I'm sorry. 146? 9 MS. VASQUEZ: Yes, thank you, Your 10 Honor. And that's plaintiff's, obviously, 11 Plaintiff's 146. 12 Q Mr. Bett, do you recognize this 13 photograph? 14 A I do. 15 Q And how do you recognize it? 16 A Because I took that picture. 17 Q Why did you take this photograph? 18 A Well, we needed it as evidence in case 19 Ms. Heard tried to make allegations towards 20 Mr. Depp. I was emphatic with him, telling him 21 that's a serious mark, and we need to photograph 22 it.</p>



1451	<p>1 MR. ROTTENBORN: I'll just move to 2 strike for foundation. 3 THE COURT: I'll allow that answer. 4 Thank you. 5 Q And when did you take this photograph? 6 A <b>It would have been around March of 7 2015.</b> 8 MS. VASQUEZ: Your Honor, we ask that 9 this photograph, please, be published to the jury 10 and admitted into evidence. 11 THE COURT: Any objection to 146? 12 MR. ROTTENBORN: No, Your Honor. 13 THE COURT: All right. 146 into 14 evidence and can be published to the jury. 15 MS. VASQUEZ: Thank you. 16 Q Mr. Bett, what does this photograph 17 show? 18 A <b>It depicts a swollen upper left 19 cheekbone with redness to it.</b> 20 Q Thank you. 21 Did you notice any other injuries on 22 Mr. Depp?</p>	1453	<p>1 have, just published to the witness, Plaintiff's 2 Exhibit Number 65. 3 THE COURT: 65. 4 Q And, Mr. Bett, this is a three-page 5 document, so I can have Mr. Arnold, please, scroll 6 down. 7 A <b>Okay. Okay. Thank you.</b> 8 Q Do you recognize these photographs? 9 A <b>I do.</b> 10 Q And how do you recognize them? 11 A <b>Because I took them.</b> 12 Q When did you take them? 13 A <b>December, mid December of '15.</b> 14 Q And why did you take these photographs? 15 A <b>I took them to show proof that he, once 16 again, had injuries sustained in an altercation.</b> 17 MS. VASQUEZ: Your Honor, we'll move to 18 publish these photographs to the jury and for 19 admittance. 20 THE COURT: Any objection to 65? 21 MR. ROTTENBORN: No, Your Honor. 22 THE COURT: All right. 65 into</p>
1452	<p>1 A <b>On that specific day, no.</b> 2 Q Later in time, did you ever notice any 3 other injuries on Mr. Depp? 4 A <b>I did.</b> 5 Q Can you, please, describe what you 6 recall? 7 A <b>It was around December of that same 8 year, 2015, he got into an argument with Ms. Heard 9 and she scratched him and he had injuries.</b> 10 MR. ROTTENBORN: Objection, Your Honor. 11 THE COURT: Sustain the objection. 12 Only your observations, sir, what you 13 saw. 14 MR. ROTTENBORN: Thank you, Your Honor. 15 THE COURT: Thank you. 16 Q Mr. Bett, can you please describe the 17 injury that you saw on Mr. Depp? 18 A <b>Yes. He had scratch marks around his 19 nose area. I believe on one of the sides of his 20 face, in the cheek area, and then, on his 21 forehead.</b> 22 MS. VASQUEZ: And if we could just</p>	1454	<p>1 evidence. It can be published. 2 Q Mr. Bett, would you, please, describe 3 what we're looking at here? 4 A <b>The first picture, there's a laceration 5 on the left side of his nose. It looks like the 6 left upper cheek has slight -- a slight bruise to 7 it, and then on his forehead, right above the 8 ridge line, just almost to the center, it looks 9 like there's a red scratch mark above his left eye 10 and to the right.</b> 11 Q Do you see that in the same subsequent 12 pictures in page 2? 13 A <b>Page 2, I see a scratch mark, a 14 vertical scratch mark adjacent to his right ear, 15 on the right side of his face.</b> 16 Q Same question for page 3. 17 A <b>Page 3, there's a scratch mark on the 18 lower right portion of his chin. There's that 19 same scratch mark on the center left side of his 20 nose. And you can see the frontal portion of that 21 bruise, it's on the left side, under his eye.</b> 22 Q Were you surprised to see Mr. Depp with</p>

1455	1 these injuries? 2 MR. ROTTENBORN: Objection. Leading. 3 THE COURT: I'll sustain as to leading. 4 Q Did you ever see any similar injuries 5 on Ms. Heard? 6 A None. 7 Q Did you see -- ever see any injuries on 8 Ms. Heard? 9 A I didn't. 10 Q Did Ms. Heard ever tell you she was 11 being abused by Mr. Depp? 12 A She didn't. 13 Q Did she ever ask you for help? 14 A No. 15 Q Did you ever see any evidence that 16 Ms. Heard was being abused by Mr. Depp? 17 A I didn't. 18 Q Turning to April 21st, 2016, Mr. Bett, 19 do you remember anything about that day? 20 A Yes. That was the day or evening that 21 Ms. Heard was celebrating her birthday with some 22 friends.	1457	1 THE COURT: Sir, if you didn't see it, 2 you can't testify to it, correct? 3 THE WITNESS: Correct. 4 THE COURT: All right. Thank you. 5 MS. VASQUEZ: Thank you, Your Honor. 6 THE COURT: The jury will strike that 7 answer. Thank you. 8 MS. VASQUEZ: Thank you, Your Honor. 9 Q Were you with Mr. Depp when he attended 10 the meeting that you mentioned earlier? 11 A I was. 12 Q And if you know, who was that meeting 13 with? 14 A It was with his accountant. 15 Q And who is Mr. Depp's accountant? 16 A Ed White. 17 Q And where did that meeting take place? 18 A It took place at his production -- his 19 old production office in the Los Angeles area. 20 Q What happened after the meeting ended? 21 A When the meeting ended, we drove to his 22 West Hollywood address, which might have been,
1456	1 Q Do you recall what birthday Ms. Heard 2 was celebrating? 3 A I'm sorry? 4 Q Do you recall what birthday Ms. Heard 5 was celebrating? 6 A I believe it was her 30th, 29th or 7 30th. 8 MR. ROTTENBORN: Your Honor, if we may, 9 can we just remove the exhibit? 10 THE COURT: Oh, yeah. Sorry. Thank 11 you. 12 Q Other than Ms. Heard's birthday 13 celebration that evening, do you recall anything 14 else about April 21st, 2016? 15 A He had a meeting that afternoon and -- 16 which extended into the evening, and that was the, 17 as I said, the night of her birthday party, where 18 they got into another argument and she had struck 19 him in the face. 20 THE COURT: All right. 21 MR. ROTTENBORN: Objection. Move to 22 strike, Your Honor.	1458	1 maybe, five, ten minutes away. He had to go 2 inside the house and retrieve something. I don't 3 know what it was. We were only there a short 4 period of time. We were kind of rushing because, 5 you know, we had been running late because it was 6 her birthday dinner, and we eventually left 7 thereafter and headed back down to the penthouses, 8 downtown Los Angeles. 9 Q How would you describe Mr. Depp's 10 demeanor after the meeting ended with Mr. White? 11 A To me, he looked fine. You could tell 12 he was in a hurry, and he was, you know, telling 13 me, okay, we've got to hurry up and go to the 14 house real quick before we go downtown. But other 15 than that, he appeared fine to me. 16 Q And based on your observations, 17 Mr. Bett, did Mr. Depp appear, to you, to be 18 intoxicated? 19 A He didn't. 20 Q I believe you testified that after you 21 left the meeting, you went to Mr. Depp's home, his 22 residence in West Hollywood, and then on to the

1459	<p>1 Eastern Columbia Building; is that correct? 2 <b>A That's correct.</b> 3 Q What happened after you arrived at the 4 penthouses for Ms. Heard's birthday dinner? 5 <b>A We went upstairs and she was having a 6 dinner with her friends in one of the penthouses, 7 I believe it was penthouse number 5, we entered 8 the front door to that penthouse, Amber stood up, 9 she walked towards Mr. Depp, she had a look of, 10 you know, you could tell she was upset, the fact 11 that he was late. You know, Mr. Depp apologized 12 to everybody, apologized to Amber and told her, 13 you know, sorry, baby, or words to that effect, 14 for being late. She gave him a hug and a kiss and 15 said, come sit down, sugar.</b> 16 Q Was that a nickname, a common nickname 17 Ms. Heard used for Mr. Depp? 18 <b>A She used to call him that quite 19 frequently in front of me.</b> 20 Q Approximately what time did you arrive 21 to the Eastern Columbia Building? 22 <b>A It would have been somewhere between,</b></p>	1461	<p>1 Q Did you happen to work the next day, on 2 April 22nd, 2016? 3 <b>A I did.</b> 4 Q When did you start working on that day? 5 <b>A On that day, I started -- I drove to 6 his West Hollywood address because Mr. McGivern 7 had sent me a text message stating they had an 8 argument.</b> 9 MR. ROTTENBORN: Objection. Hearsay. 10 THE COURT: All right. I'll sustain as 11 to hearsay. 12 Q Why did you start your shift at the 13 Sweetzer property, or Mr. Depp's West Hollywood 14 property, as opposed to the Eastern Columbia 15 Building? 16 <b>A Because that's where Mr. Depp was at 17 the time.</b> 18 Q Do you recall anything specific about 19 that day, April 22nd, 2016? 20 <b>A Just he had told me they had a --</b> 21 MR. ROTTENBORN: Objection. 22 THE COURT: I'll sustain the objection.</p>
1460	<p>1 <b>maybe, 9 and 10:00 in the evening.</b> 2 Q Do you know what time the birthday 3 dinner for Ms. Heard was scheduled to start? 4 <b>A I can't remember the exact time.</b> 5 Q Do you recall how late you and Mr. Depp 6 were to the birthday dinner? 7 <b>A I knew we were running behind, but, as 8 I said, I didn't know, actually, what time the 9 dinner was starting.</b> 10 Q And once you arrived at the penthouse 11 in the Eastern Columbia Building, did you go 12 inside? 13 <b>A Briefly. I had a couple of Mr. Depp's 14 computer bags and bags with me, and I just sat 15 them down in the corner and then I exited 16 thereafter.</b> 17 Q How long did you stay at the Eastern 18 Columbia Building after exiting the penthouse? 19 <b>A I was probably there, perhaps, maybe 20 another hour or two, and then I would have been 21 relieved by the night shift security personnel, 22 Travis McGivern.</b></p>	1462	<p>1 You cannot say what he told you, sir. I'm sure 2 you have testified before. 3 THE WITNESS: I have, Your Honor. 4 THE COURT: Yes. Thank you. 5 Q Did you see Mr. Depp when you arrived 6 to the -- his West Hollywood home on April 22nd, 7 2016? 8 <b>A I did.</b> 9 Q Did you observe any injuries on 10 Mr. Depp? 11 <b>A I didn't.</b> 12 Q In this time frame of April 2016, do 13 you recall Mr. Depp's mother having any health 14 problems? 15 <b>A Yes.</b> 16 Q What do you recall about her health 17 problems? 18 <b>A At that time, she was very critical. 19 She had been suffering from cancer for some time, 20 a few years, I believe, and at that stage, she was 21 slowly deteriorating, so it was, approximately, a 22 month before she passed.</b></p>

<p style="text-align: right;">1463</p> <p>1 Q Do you recall when she passed away?</p> <p>2 A <b>I believe it was around May 20th, 19th.</b></p> <p>3 Q And how did you learn that she had</p> <p>4 passed away?</p> <p>5 A <b>Mr. Depp told me.</b></p> <p>6 Q And, again, based on your observations,</p> <p>7 how would you describe Mr. Depp's demeanor when he</p> <p>8 informed you that his mother had passed away?</p> <p>9 A <b>Well, he just lost his mother, so he</b></p> <p>10 <b>was, you know, you could tell he was, you know,</b></p> <p>11 <b>very sad and he was mourning. And, so, I just</b></p> <p>12 <b>left him alone until he needed me for whatever I</b></p> <p>13 <b>had to do for him that day.</b></p> <p>14 Q And to your knowledge, Mr. Bett, when</p> <p>15 was the next time Mr. Depp saw Ms. Heard?</p> <p>16 A <b>Maybe a month later, sometime in May.</b></p> <p>17 Q I'm sorry. Was that a month after the</p> <p>18 birthday dinner on April 21st, 2016?</p> <p>19 MR. ROTTENBORN: Objection. Leading.</p> <p>20 THE COURT: I'll sustain as to leading.</p> <p>21 Q To your knowledge, after April 21st,</p> <p>22 2016, when did Mr. Depp next see Ms. Heard?</p>	<p style="text-align: right;">1465</p> <p>1 MR. ROTTENBORN: Objection. Hearsay,</p> <p>2 Your Honor.</p> <p>3 THE COURT: All right.</p> <p>4 MS. VASQUEZ: It's just to establish.</p> <p>5 THE COURT: That he wanted to talk to</p> <p>6 Ms. Heard. That's fine. We'll leave it at that.</p> <p>7 Next question.</p> <p>8 MR. ROTTENBORN: Thank you, Your Honor.</p> <p>9 MS. VASQUEZ: Thank you.</p> <p>10 Q So you were working on May 21st; is</p> <p>11 that right?</p> <p>12 A <b>I was.</b></p> <p>13 Q Did you end up taking Mr. Depp to the</p> <p>14 penthouses at Eastern Columbia Building?</p> <p>15 A <b>I did. And Mr. Judge was along with me</b></p> <p>16 <b>as well.</b></p> <p>17 Q And do you remember, approximately,</p> <p>18 what time you arrived at the penthouses?</p> <p>19 A <b>It would have been sometime after 7:30,</b></p> <p>20 <b>maybe 7:45, 7:15. Around that time frame.</b></p> <p>21 Q And was that in the evening?</p> <p>22 A <b>It was.</b></p>
<p style="text-align: right;">1464</p> <p>1 A <b>In my presence, he would have seen her</b></p> <p>2 <b>May 21st.</b></p> <p>3 Q And was that after Mr. Depp's mother</p> <p>4 passed away?</p> <p>5 A <b>Correct. That would have been a day</b></p> <p>6 <b>after she passed.</b></p> <p>7 MS. VASQUEZ: I have, approximately,</p> <p>8 10, 15 minutes left.</p> <p>9 THE COURT: I'll let you finish, if</p> <p>10 that's okay with the jury. We'll finish, at</p> <p>11 least, the direct.</p> <p>12 MS. VASQUEZ: Thank you.</p> <p>13 THE COURT: That's fine.</p> <p>14 Q Turn to May 21st, 2016. Please tell us</p> <p>15 what you remember about that day.</p> <p>16 A <b>That day, we were at his West Hollywood</b></p> <p>17 <b>address. Jerry Judge, his chief security guard,</b></p> <p>18 <b>was with me and with us at the estate at the time.</b></p> <p>19 <b>Later on in that evening, Mr. Depp told us that he</b></p> <p>20 <b>wanted to go down and retrieve some items from the</b></p> <p>21 <b>penthouse, and he also wanted to talk, briefly,</b></p> <p>22 <b>with Ms. Heard.</b></p>	<p style="text-align: right;">1466</p> <p>1 Q Did you enter the penthouses with</p> <p>2 Mr. Depp?</p> <p>3 A <b>I did. Myself and Jerry Judge and</b></p> <p>4 <b>Mr. Depp.</b></p> <p>5 Q And what did you do when you first</p> <p>6 entered the penthouse?</p> <p>7 A <b>When we first walked in, on the center</b></p> <p>8 <b>island in the kitchen, there were candles lit on</b></p> <p>9 <b>the table, there was a couple wine glasses that</b></p> <p>10 <b>were empty, and there was a bottle of wine that</b></p> <p>11 <b>was open. There was also music playing in the</b></p> <p>12 <b>background through the speakers that were in the</b></p> <p>13 <b>wall.</b></p> <p>14 Q Did you see Ms. Heard when you first</p> <p>15 entered the penthouse?</p> <p>16 A <b>I didn't.</b></p> <p>17 Q What happened after you entered the</p> <p>18 penthouses?</p> <p>19 A <b>After we entered the penthouses, Jerry</b></p> <p>20 <b>Judge told Johnny that myself and --</b></p> <p>21 THE COURT: Yes.</p> <p>22 MR. ROTTENBORN: Objection. Hearsay.</p>

<p>1467</p> <p>1 THE COURT: All right. I'll sustain 2 the objection. 3 All right. Next question. 4 MS. VASQUEZ: Okay. 5 Q Did you stay inside the penthouse with 6 Mr. Judge and Mr. Depp? 7 A No. Shortly thereafter, Mr. Judge and 8 I exited the penthouse and stood outside the door, 9 briefly. 10 Q How long would you estimate that you 11 stood outside the door of the penthouse? 12 A It would have been, approximately, 13 maybe, ten minutes, maybe a little bit more, a 14 little bit less. 15 Q And after standing outside the 16 penthouse for ten minutes, give or take, where did 17 you go next? 18 A We walked down the hallway to penthouse 19 number 5. Penthouse number 5 has two doors, 20 there's a main entrance that takes you into the 21 living room. Next to it, around the corner, it's 22 a continuation of the penthouse, which is, like, a</p>	<p>1469</p> <p>1 Q Did he appear intoxicated to you when 2 he arrived to the Eastern Columbia Building? 3 A No. 4 Q So you went to the storage area of the 5 penthouse area. How long were you there? 6 A We might have been there, maybe, 7 ten minutes, five minutes. We got something to 8 drink and then we exited that, you know, penthouse 9 I described, or that penthouse storage area. 10 Q And where did you go next? 11 A We walked down the hall towards 12 Mr. Depp's penthouse, which would have been 13 penthouse number 3. 14 Q And did you stand outside the door or 15 did you go in? 16 A We -- as we approached the door, we 17 could hear this screaming and shouting from 18 Ms. Heard, so I immediately opened up the door and 19 Mr. Judge and I ran in there. 20 Q What do you remember Ms. Heard 21 screaming or shouting? 22 A It appeared she was shouting</p>
<p>1468</p> <p>1 storage area. It also has -- it had a couch at 2 the time and a TV for the security personnel. So 3 once we were at the penthouses, we could go in 4 there, have lunch or dinner or watch a little bit 5 of TV, and then, you know, whenever Mr. Depp or 6 Ms. Heard would leave and I'd have to drive or the 7 other security personnel, we would get a text or 8 they would come knock on the door and we would 9 leave. 10 Q And when you first arrived to the 11 penthouses with Mr. Depp, based on your 12 observations, was he drinking? 13 A He had had some glasses of wine at the 14 meeting he was at with his accountant. 15 Q Apologies, Mr. Bett, I meant on 16 May 21st, 2016. 17 A Oh, I'm sorry. I'm sorry. 18 Q Did you observe Mr. Depp drinking any 19 alcohol that day? 20 A He might have had a glass of wine in 21 the car, but as far as the entire day, I wouldn't 22 have known how much he drank.</p>	<p>1470</p> <p>1 profanities. So once Mr. Judge and I went through 2 the front door, Mr. Depp would have been standing 3 directly in front of us, maybe about 20 feet. 4 Because parallel to us, walking in, or running in, 5 there was a wall. It was the way the kitchen was 6 set up, it was almost like an L shape. So you 7 walk in and then you'd have to make a left. So 8 Mr. Depp would have been standing in front of us 9 and he glanced at us. As soon as Mr. Judge and I 10 rounded the corner, I saw Ms. Heard standing next 11 to her good friend, Raquel Pennington. 12 Q And how was Ms. Heard standing? Where 13 were her hands? 14 A Her hands would have been in this 15 motion. Once Mr. Judge and I rounded that corner 16 and she saw both Jerry and I, she had this look of 17 surprise on her face, and then she looked at 18 Mr. Depp and us and she shouted out loud, "This is 19 the last time you do this to me." 20 At which point, Mr. Depp looked at her 21 and said, "What the hell are you talking about?" 22 At that point, Mr. Judge tapped Mr. Depp on the</p>

1471	<p>1 arm and told him, boss, let's leave. 2 So we gathered -- there was a couple of 3 computer bags that was right on the table, and we 4 exited the front door to penthouse number 3. 5 Q Based on your observations, did you 6 see -- did you have a clear view of Ms. Heard? 7 A I did. 8 Q Did you have a clear view of her face? 9 A I did. 10 Q Did you observe any injuries on 11 Ms. Heard's face? 12 A I didn't. 13 Q Did you see any redness? 14 A I didn't. 15 Q Swelling? 16 A None. 17 Q Was Ms. Heard holding her face? 18 A She wasn't. 19 Q So what happened next? 20 A We exited penthouse number 3 and we 21 walked down the hallway. Right when we were 22 getting close to penthouse number 5 door, Mr. Depp</p>	1473	<p>1 Q And while Mr. Depp was in penthouse 2 number 3, did you observe him cause any damage? 3 A No. 4 Q Did you observe him cause any damage to 5 any of the penthouses on May 21st, 2016? 6 A No. 7 Q Did you see Mr. Depp become violent 8 with anyone while at the penthouses on May 21st, 9 2016? 10 MR. ROTTENBORN: Objection. Leading. 11 THE COURT: I'll allow it. That's 12 fine. 13 A I didn't. 14 Q Mr. Bett, have you ever seen Mr. Depp 15 become violent with Ms. Heard? 16 A I haven't. 17 MS. VASQUEZ: Thank you. I have 18 nothing further. 19 THE COURT: All right. You can stay 20 right there, sir. Ladies and gentlemen, that 21 concludes the testimony for today. So I'll 22 release you, we'll be back here at 10:00 a.m.</p>
1472	<p>1 says "I need to get in here and look for 2 something." 3 So I opened up the door for him. We 4 went inside and that's when I saw Ms. Heard's 5 friend, Raquel Pennington's boyfriend, Josh Drew, 6 and another unknown female that I'd never seen 7 before, and there was a small dog, kind of walking 8 around. 9 Mr. Depp, I believe he said "Get the 10 fuck out of my apartment." 11 So, Mr. Drew nodded his head and 12 basically says, okay. The female picked up the 13 dog and they exited the front door to that 14 penthouse. 15 Q What did Mr. Depp do next? 16 A He was walking around the kitchen area, 17 living room area. He might have gone upstairs, 18 briefly. I can't remember. I don't know what he 19 was looking for. I didn't ask him, Mr. Judge 20 didn't ask him. Eventually, he didn't find 21 whatever he was looking for and we exited 22 penthouse number 3.</p>	1474	<p>1 tomorrow. Please have a safe, quiet night. 2 Please take care of yourself. Take your vitamins, 3 we need you. We will see you in the morning. 4 Don't talk to anyone, don't do any outside 5 research, okay? 6 Thank you. 7 (Whereupon, the jury exited the 8 courtroom and the following proceedings took 9 place.) 10 THE COURT: All right. And, Mr. Bett, 11 since you're still in the middle of your 12 testimony, you cannot talk to the attorneys or 13 Mr. Depp about your testimony or about this case, 14 okay? 15 THE WITNESS: I understand. 16 THE COURT: And we'll see you tomorrow 17 at 10:00 a.m. 18 THE WITNESS: Thank you, Your Honor. 19 THE COURT: Thank you. You're 20 released. 21 Anything else for this evening? 22 MR. CHEW: Yes, Your Honor, just wanted</p>

Transcript of Jury Trial - Day 5  
Conducted on April 18, 2022

78 (1475 to  
1478)

1475	1 a point of clarification. 2 THE COURT: Okay. Sure, go ahead. 3 MR. CHEW: Perhaps we should approach. 4 THE COURT: Approach? Okay. Sure. 5 (Sidebar.) 6 THE COURT: Yes. 7 MR. CHEW: We have asked about -- we do 8 anticipate that Mr. Depp will start his testimony 9 tomorrow, probably be in the middle of his direct 10 tomorrow night. 11 THE COURT: I understand. 12 MR. CHEW: I'm sure Ms. Bredehoff will 13 cross-examine. So the question is, since he's not 14 a normal witness, in the sense that he's been 15 hearing all the testimony, my questions is, to 16 what extent can we talk to him in the middle of 17 direct or after -- 18 THE COURT: No, I understand. But he's 19 just like any other witness. Once he takes that 20 oath, you just can't talk about his testimony. 21 MR. CHEW: Yes, we just wanted to make 22 sure.	1477	1 THE COURT: That's good. You guys have 2 a good evening, okay? 3 MR. CHEW: Thank you very much, Your 4 Honor. 5 THE COURT: All right. Thank you. 6 We'll be in recess, then. 7 (Open court.) 8 THE BAILIFF: All rise. 9 (Whereupon, the trial was recessed at 10 5:14 p.m. to reconvene 10:00 a.m., Tuesday, April 11 19, 2022.) 12 13 14 15 16 17 18 19 20 21 22
1476	1 THE COURT: It makes sense. That's 2 fine. That goes on both sides, obviously. 3 MR. CHEW: So that would apply to 4 Ms. Heard as well. 5 MS. BREDEHOFT: Absolutely. 6 THE COURT: Also, as far as the 7 alternate goes, on reflection, I think it should 8 be the first person we call as the next alternate, 9 and I have it as Number 10. 10 MS. BREDEHOFT: That's what I have. 11 THE COURT: Just double-checking. 12 MS. BREDEHOFT: I have one more 13 question. You have one more witness tomorrow 14 before Mr. Depp, right? 15 MR. CHEW: That's correct. 16 THE COURT: That's a live witness? 17 MR. CHEW: It's a live witness. I 18 don't think he'll take very long. 19 THE COURT: Well, I've heard that. 20 That's the kettle. Anyway. 21 MS. BREDEHOFT: I was waiting to go say 22 what he said. He's not a normal person.	1478	1 CERTIFICATE OF SHORTHAND REPORTER 2 I, JUDITH E. BELLINGER, RPR, CRR, the 3 court reporter before whom the foregoing hearing 4 was taken, do hereby certify that the foregoing 5 excerpt transcript is a true and correct record of 6 the proceedings; that said proceedings were taken 7 by me stenographically and thereafter reduced to 8 typewriting under my direction; and that I am 9 neither counsel for, related to, nor employed by 10 any of the parties to this case and have no 11 interest, financial or otherwise, in its outcome. 12 IN WITNESS WHEREOF, I have hereunto set 13 my hand and affixed my notarial seal this 19th day 14 of April, 2022. 15 My Commission Expires: September 30, 2024 16 17 18 <i>Judith E. Bellinger</i> 19 _____ 20 NOTARY PUBLIC IN AND FOR 21 THE COMMONWEALTH OF VIRGINIA 22