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# Transcript of Jury Trial - Day 7

**Date:** April 20, 2022  
**Case:** Depp, II -v- Heard

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WORLDWIDE COURT REPORTING & LITIGATION TECHNOLOGY

Transcript of Jury Trial - Day 7  
Conducted on April 20, 2022

1 (1693 to 1696)

1693	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 Wednesday, April 20, 2022 16 10:00 a.m. EDT 17 TRIAL DAY 7 18 19 Job No.: 443887 20 Pages: 1693 - 1887 21 Reported by: Judith E. Bellinger, RPR, CRR 22	1695	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
1694	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	1696	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 LECAROZ, 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

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<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 2 1870 1870</p> <p>5 61 1780 1780</p> <p>6 92 1802 1802</p> <p>7 93 1803 1803</p> <p>8 144 1775 1775</p> <p>9 145 1774 1774</p> <p>10 343 1789 1789</p> <p>11 397 1838 1838</p> <p>12 408 1862 1863 (pending redactions)</p> <p>13 409 1853 1853</p> <p>14 411 1851 1851</p> <p>15 414 1852 1852</p> <p>16 487A 1848from page 1849to 494, into evidence.</p> <p>17</p> <p>18 Defendant's</p> <p>19 1458 1883 1883</p> <p>20</p> <p>21</p> <p>22</p>
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<p>1 CONTENTS</p> <p>2 EXAMINATION OF JOHN C. DEPP, II (CONTINUING) PAGE</p> <p>3 By Ms. Meyers 1701</p> <p>4 By Mr. Rottenborn 1869</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</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 THE BAILIFF: All rise. Please be</p> <p>3 seated and come to order.</p> <p>4 THE COURT: Good morning.</p> <p>5 MR. CHEW: Good morning, Your Honor.</p> <p>6 MS. BREDEHOFT: Good morning.</p> <p>7 THE COURT: Are there any preliminaries</p> <p>8 before we get started?</p> <p>9 MR. CHEW: No, Your Honor.</p> <p>10 THE COURT: Good. Two days in a row.</p> <p>11 Mr. Depp, you can take your seat in the</p> <p>12 stand, please.</p> <p>13 All right. You're ready for the jury?</p> <p>14 MS. MEYERS: Yes.</p> <p>15 THE COURT: All right.</p> <p>16 (Whereupon, the jury entered the</p> <p>17 courtroom and the following proceedings took</p> <p>18 place.)</p> <p>19 THE COURT: All right. Good morning,</p> <p>20 ladies and gentlemen. All right. You can have a</p> <p>21 seat.</p> <p>22 And just a reminder that you're still</p>

<p>1701</p> <p>1 under oath, Mr. Depp, okay? 2 THE WITNESS: Yes, ma'am. 3 THE COURT: Thank you. 4 THE WITNESS: Thank you, Your Honor. 5 THE COURT: All right. 6 EXAMINATION BY COUNSEL FOR THE PLAINTIFF AND 7 COUNTERCLAIM DEFENDANT (CONTINUING) 8 BY MS. MEYERS: 9 Q Good morning, Mr. Depp. 10 A Good morning. 11 Q Yesterday you told us a little bit 12 about the beginning of your relationship with 13 Ms. Heard. When did Ms. Heard's behavior towards 14 you begin to change? 15 A I believe, as I said yesterday, there 16 was a hint of something with the -- having to do 17 with the boots coming off and breaking routine. 18 Her attitude, or her -- the way that 19 she would begin to speak to me -- first, things 20 started coming up and it was I was suddenly just 21 wrong about everything. If I made a statement 22 about something that I had been familiar with, for</p>	<p>1703</p> <p>1 people, both people need to speak, but there was 2 no -- there was no way to fit a word in. It was 3 sort of a rapid-fire, sort of endless parade of 4 insults and -- you know, looking at me like I was 5 a fool. And I just couldn't -- I was having 6 difficulty in my mind, of course, and in my heart 7 dealing with that sort of barrage. And part of 8 that is I just -- I was confused as to the fact 9 that whatever her age was at the time of these 10 various arguments, mid 20s to late 20s and then to 11 30s, I couldn't understand how I had somehow, 12 somehow, gotten -- arrived at where I'd arrived 13 from where I came from in the beginning of my life 14 and worked for 30-plus years doing these things. 15 It was astounding how wrong I was about 16 everything that I had experienced within the 17 movie -- within the film industry or within 18 working just life itself. I was sort of not 19 allowed to be right. Not allowed to have a voice. 20 So, at a certain point, when that -- 21 what enters your mind is you start to slowly 22 realize that you are in a relationship with your</p>
<p>1702</p> <p>1 example, in my work that I had been chopping away 2 at for a good 30-some years, I was suddenly wrong. 3 Then beyond that, if you tried to explain yourself 4 and correct the problem, the misunderstanding, it 5 would then begin to heighten, as Ms. Heard was 6 unable to be wrong. It just didn't happen. She 7 couldn't be wrong. 8 So, these little digs and -- would 9 commence with demeaning name-calling, berate, to 10 be made a fool of, and those would escalate into a 11 full-scale argument. And in the beginning, as one 12 does, one sticks up for oneself in a debate, as it 13 were, or an argument over something, to try to 14 prove the point. 15 But when it escalates and then -- it's 16 hard to explain, but the argument would start here 17 (indicating) and then it would roll around and 18 become this circular thing of its own. So you get 19 back to the beginning, essentially, of the 20 argument. Now it's heightened even more, but it's 21 still circular and there's no way in or out. 22 If there is a dialogue between two</p>	<p>1704</p> <p>1 mother, in a sense. And I know that that sounds 2 perverse and obtuse, but the fact is that some 3 people search for weaknesses in people, and that 4 is to say sensitivities, and when you've told that 5 person your life and what you've lived through, 6 what you've been through, just as happens in 7 relationships, the more that became ammunition for 8 Ms. Heard to either verbally decimate me or to 9 send me into a kind of a tailspin of confusion and 10 depression, and the -- well, it's not a happy day, 11 it's not a happy week, it's not a happy month when 12 you're constantly being told how wrong you are 13 about this or that, what an idiot you are, or 14 anything. It just -- then it increased, increased 15 and became an endless -- it became endless, that 16 endless circle. 17 So as it escalated and continued to 18 escalate, I went straight to what I had learned as 19 a youth, which was to remove myself from the 20 situation so that it couldn't continue because 21 there's only so much your ears can hear and never 22 forget.</p>

<p>1705</p> <p>1 So I would remove myself from the 2 situation, as I'd done as a youth, as much as 3 possible, because I just certainly didn't believe 4 that there was any need for these various subjects 5 or arguments to come up and travel the distance 6 that they did so very quickly, to ramp up so fast. 7 It was like you were pinned to a wall and had to 8 just listen to it and take it.</p> <p>9 So I found the only way to find any 10 sort of peace was to try to walk away. If she 11 didn't allow me to walk away, there were times 12 when I would just go and lock myself in, you know, 13 the bathroom or anywhere that she couldn't get 14 into, and that happened constantly over the years.</p> <p>15 Q What would happen when the fights would 16 escalate, other than going and hiding in the 17 bathroom?</p> <p>18 A I'm sorry? What would happen? Well, 19 if they continued to escalate, if I continued to 20 try to present my version of my side of the story, 21 when you're approached in a kind of -- well, when 22 you're approached with such anger and hatred, it</p>	<p>1707</p> <p>1 Q You mentioned that Ms. Heard would use 2 information you gave her against you like a 3 weapon.</p> <p>4 Can you explain that a little bit?</p> <p>5 A I've said this before in various 6 interviews, but certainly in life, my -- if I have 7 one ambition, and ambition, for me, when you 8 equate it with Hollywood, has become a very -- has 9 become an ugly word, in a sense, because ambition 10 means I want to be famous at any cost. I don't 11 care what for, I just want to be famous. That's 12 one thing. That's one part of it. If you have 13 hunger or a need or a drive to present your work, 14 that, to me, is the way to go about it. Fame has 15 nothing to do with it.</p> <p>16 So, I was more -- I mean, basically, 17 the only ambition that I've ever had in my life 18 came -- arrived the second that my first child 19 arrived, in the second, in the instant, which was 20 to be a good parent. To be a great father. To be 21 the best father I could.</p> <p>22 And then, there were several occasions</p>
<p>1706</p> <p>1 seemed like pure hatred for me. If I stayed to 2 argue that, eventually, I was sure that it was 3 going to escalate into violence, and oftentimes it 4 did. Many times it did.</p> <p>5 Q And when you say "violence," what are 6 you referring to specifically?</p> <p>7 A Ms. Heard, in her frustration and in 8 her rage and her anger, she would strike out. She 9 would -- it could begin with a slap. It could 10 begin with a shove. It could begin with, you 11 know, throwing the TV remote at my head. It could 12 be throwing a glass of wine in my face. But, all 13 in all, it was just a -- it was constant -- it was 14 a built-in list of -- as I said, my personal 15 experiences, which I gave to Ms. Heard, those 16 things were -- those facts were used against me as 17 weapons, especially when it, you know, when it 18 came to my kids.</p> <p>19 So, yeah, I -- there was no need for 20 it. It just -- there was no need for it. Too 21 many lines were crossed. You couldn't see the 22 lines anymore.</p>	<p>1708</p> <p>1 where Ms. Heard would tell me what a bad father I 2 was and that I had no idea how to parent. And, 3 again, it falls into the same category as before. 4 I couldn't understand how in 52 years, or however 5 old I was at the time, how I could be so wrong 6 about everything. I mean, one learns along the 7 road. The result is -- the result of the road is 8 not important, it's the road that's important, 9 because we don't know exactly what's going to 10 happen in ten years. We don't know. So the road 11 is what I pay attention to. And paying attention 12 to trying to spend as much time with my children 13 as possible, even that would -- that could send 14 Ms. Heard into a monumental tailspin, where I 15 could hardly ever go and see my kids and spend 16 time with my kids because she had to have me there 17 at all times for her own needs.</p> <p>18 Q So --</p> <p>19 A And that was something that once you 20 realize that that's happening and then there are 21 hassles between the children and her, the 22 situation starts to get a little more grim and a</p>

<p style="text-align: right;">1709</p> <p>1 little more dire. And that, I was not prepared to 2 take. I would not hear the words "You're a bad 3 father. You're a terrible father. You're an 4 awful father." 5       So, one can only take so much of that 6 before bits of your brain, bits of your heart 7 begin to -- the valve gets shut off because you 8 can't hear it anymore and you know that it's not 9 true, and you know that it's meant as a -- it's 10 just to -- it's to slice you up. It's to bring 11 you down. It's to demean you. It's to bring you 12 into a place where you start to believe that 13 there's something wrong with you. And there's 14 plenty wrong with me. There's plenty wrong with a 15 lot of people. But in all of these situations, my 16 main goal was to retreat because I think in life, 17 most important, is pick your battles. If there's 18 a battle to be fought, that it's grave and 19 important, then that must be dealt with. But 20 small insults and kind of teenage, high school 21 tactics, this bullying, if you will, was becoming 22 too much to take.</p>	<p style="text-align: right;">1711</p> <p>1 over the years, and I can only say it's luck in a 2 sense that someone hands you the ball in the 3 beginning and you run with it, and you run as far 4 as you can before you get tackled. So that's what 5 I've always done. 6       But what happens is the word -- when 7 the word "celebrity" or when you were a, what do 8 they call it, a public figure, that's what it is, 9 a celebrity or a public figure, again, not 10 complaining, but there are things that are very 11 uncomfortable. And that is to say, that at that 12 point, anybody can say anything they want to about 13 you. And that's happened to me over 36 years or 14 more. That things can be printed in the newspaper 15 that are utterly false, and this is even early on. 16       So this is where that privilege, I 17 suppose that they call the privilege of celebrity, 18 that's where that sticks a knife in you because 19 it's one of those -- that's one of those 20 situations where your arms are too short to box 21 with God, you know, there are too many of them 22 coming at you.</p>
<p style="text-align: right;">1710</p> <p>1       Q So why did you stay with Ms. Heard, 2 given this type of behavior? 3       A That's a very complicated answer. I 4 would -- I can only say that I stayed through all 5 that -- I'm sure that it's somehow related to my 6 father remaining stoic as my mother would beat him 7 to death. I'm sure it had a lot to do with having 8 been in a beautiful, wonderful, 14-, 15-year 9 relationship with Vanessa, the mother of my 10 children, raising those kids. There was -- I had 11 no interest in being the -- the words that they 12 use that I dislike very much, a celebrity, or an 13 entertainer, or fame is a strange word because I 14 could never equate it with myself. I pumped gas, 15 I worked construction, I printed T-shirts, I dug, 16 you know, I had many, many jobs before any of this 17 happened to me. So I've been able to live both 18 sides of that life -- of life. I know the very 19 lows and I know the very highs of where my life 20 has gone. And I've -- it's not -- I don't -- 21 again, it would be pure idiocy for me to sit up 22 here as an actor who's been very, very fortunate</p>	<p style="text-align: right;">1712</p> <p>1       So, yes, I don't know what her 2 motivations were, if they were -- if there was 3 some species of jealousy or there was some species 4 of maybe just hatred, I don't know. But in any 5 case, the elevation and the escalation of these 6 day-to-day arguments were simply unnecessary. It 7 was not to help the relationship. It did not help 8 the relationship. It wasn't meant to help the 9 relationship. It was meant to feed her need for 10 conflict. She has a need for conflict. She has a 11 need for violence. It erupts out of nowhere and 12 what I learned, the only thing I learned to do 13 with it is exactly what I did as a child, retreat. 14 Just take a step back, which I told her, "we need 15 to remove ourselves from each other, even for an 16 hour, a day, anything, because this can't go on. 17 No one can live like this." 18       But why did I stay? I stayed, I 19 suppose, because my father stayed. I suppose 20 because I had been in that relationship with 21 Vanessa, and that was lost, and I didn't want 22 to -- I didn't want to fail. I wanted to try to</p>

<p style="text-align: right;">1713</p> <p>1 make it work. I felt maybe I could help her. I 2 thought maybe I could bring her around because the 3 Amber Heard that I knew for the first year, year 4 and a half, was not this, suddenly, this opponent. 5 It wasn't my girl. She had become my opponent and 6 everything that I did just didn't fit her. It 7 wasn't -- she didn't accept it. 8       So I stayed because, of course, I 9 didn't want to fail. I didn't want to hurt 10 anyone, especially Ms. Heard. I didn't want to 11 break her heart. 12       I remember very well that when my 13 father left and my mother, Betty Sue, that first 14 attempt at suicide that I woke up to, and that 15 visual in my head; and that was a direct result of 16 my father's leaving. Ms. Heard had spoken of 17 suicide on a couple of occasions, so, that also 18 becomes a factor. That's also something that 19 always lives in the back of your brain and that 20 you fear. Because when I would leave sometimes, 21 and many times when I would try to leave, she 22 would, you know, stop me at the elevator with the</p>	<p style="text-align: right;">1715</p> <p>1 small and, like, nothing. So what I thought was, 2 I'm going to record the conversation, and I told 3 her this, I'm going to record. I'm going to get 4 my phone and I'm going to record our conversation 5 because I want you to hear what you've said to me 6 tomorrow so that you -- because she would deny 7 having said those things. What are you talking 8 about? You know, it was surreal. She had 9 completely denied things she said directly to my 10 face in a heated and volatile way, and she denied 11 it. So I went to her and I said "I'm going to 12 record us." And I did. And we recorded the 13 conversation, which when she was on tape -- the 14 first time, it wouldn't -- it escalated a bit, but 15 she was -- well, it was clear that she was 16 performing for the tape because it was being 17 recorded. So that was another clue that something 18 was slightly rotten in the state of Denmark, as it 19 were. 20    Q   What did Ms. Heard say to you about you 21 recording the conversations between you and her? 22    A   I mean, initially, she said, "Sure, go</p>
<p style="text-align: right;">1714</p> <p>1 security guards, crying, screaming, you know, I 2 can't live without you. You know, I'm going to 3 die. But you had to get out. There were even a 4 couple of times when I did escape and got to my 5 house, arrived at my house at Sweetzer and then 6 five minutes later she would arrive in the, I 7 don't know what car she was driving at the time, 8 but she would arrive in her nightgown, screaming 9 in the parking lot in front of my house, screaming 10 to high heavens and it would be four in the 11 morning, three in the morning. It was ludicrous. 12 It was out of control. It was uncontrollable. 13    Q   Did there come a time when you and 14 Ms. Heard started recording your arguments? 15    A   Yes. In fact, it was -- I was the 16 first person of the two of us to record 17 conversations. And it was for this reason: We 18 would have been talking the night before, or 19 arguing the night before, and she would say 20 something, there would be these, again, these 21 demeaning, berating insults. There would be these 22 jabs. There would be anything to make me feel</p>	<p style="text-align: right;">1716</p> <p>1 ahead." 2    Q   Did that ever change? 3    A   No. She -- then she started recording. 4 But surreptitious, without saying -- without 5 telling me that she was recording something, which 6 is fine, but not so fine, if you know what I mean. 7       Even in those tapes, I don't -- 8 there's -- it never took me to a place where I 9 would go switch into some other entity, which is, 10 as she has used the term "monster," never switched 11 to violence. Violence was unnecessary. Why would 12 you hit someone to make them agree with you? I 13 don't think it works. 14    Q   Mr. Depp, you mentioned the term 15 "monster," and I think we heard about that in the 16 opening statements. 17    A   Yes. 18    Q   What does the term "monster" mean to 19 you? 20    A   Well, the term monster means, to me, 21 you know, in the beginning, she had used a 22 different word to describe the same thing, and she</p>

<p style="text-align: right;">1717</p> <p>1 would use the word demon – "demons" that my 2 demons were coming out. That she had noticed 3 there was a great change in my attitude or my 4 aggressiveness – aggressive nature. She would 5 say that the demons had come out and they 6 controlled me and that sort of thing. 7 I don't remember exactly how monster 8 came out, but that word stuck and it stayed, well, 9 until this day. 10 What I believe the monster was, in 11 Ms. Heard's mind, was her intense – 12 MR. ROTTENBORN: Objection, Your Honor. 13 His belief about what monster meant in Ms. Heard's 14 mind is not relevant and foundation. 15 THE COURT: Okay. 16 MS. MEYERS: Let me ask another 17 question. 18 THE COURT: I'll sustain the objection. 19 Go ahead. 20 Q When you used the term monster, what 21 were you referring to in your conversations with 22 Ms. Heard?</p>	<p style="text-align: right;">1719</p> <p>1 some kind of 19th century sailor, that was the 2 word she clung to, to describe. But it was in her 3 mind, not mine. 4 Q How did your relationship with 5 Ms. Heard affect your substance use? 6 A Well, for example, when we were on the 7 road, you know, when you're traveling, if you're 8 on a press tour, or if you're making a film and 9 you're staying in hotels, or this or that, I would 10 always have to get a different -- or we would 11 always have to book an extra room that I was able 12 to escape to so I didn't have to lock myself in 13 another bathroom. 14 It breaks you down. The constant 15 haranguing breaks you down and, you know, there's 16 a part of you that says if I'm going to be accused 17 of this, might as well just do it. 18 But it never exceeded, it never -- my 19 substance abuse or use, the alcohol that I used or 20 drank was, again, purely -- it's that little boy 21 who didn't want to hear -- or didn't want to feel 22 the pain of his mother turning him into some kind</p>
<p style="text-align: right;">1718</p> <p>1 A When I used the term monster with 2 Ms. Heard, I was placating. If she had referred 3 to me as being a monster, there was no way that I 4 was going to sit there and go through a 45-minute 5 argument about, you know, you're a monster. No, 6 I'm not. You're a monster. No, I'm not. You're 7 a monster. No, I'm not. It was impossibility. 8 So, what do you do? You accept her vernacular. 9 You accept what the word that she uses, and then 10 you use that word to placate her so that it would, 11 at least, calm part of the aggression. It would 12 lessen the attacks, you know. 13 So explaining the monster was, for 14 me -- I mean, she had told me many times that the 15 monster was only me when I was using drugs and 16 alcohol. 17 But even when I was stone-cold sober 18 off of alcohol and substances, aside from my meds, 19 the term "the monster" was still there. 20 When she accused me of being high on 21 cocaine or, you know, drinking like a, you know, 22 some sort of, like, drinking like I was, you know,</p>	<p style="text-align: right;">1720</p> <p>1 of ball of insecurity and pain. 2 So, yes, I was more inspired by 3 Ms. Heard to reach out for a numbing agent because 4 of the constant clashes, because of the -- there 5 wasn't -- I mean, maybe a few days here and there, 6 but there wasn't a day that you'd wake up and 7 you'd expect something was going to hit the fan, 8 and pretty much like clockwork, it did. 9 So, yes, I had to have something to 10 distance me and distance my heart from those 11 verbal attacks. I had to have something to be 12 able to maintain me. And I'm afraid for a while, 13 because of placation, because I didn't want to 14 rock the boat, as it were. Again, you pick your 15 battles. 16 So, placation seemed the best route, if 17 I was unable to escape her clutches. 18 Q How, if at all, did Ms. Heard try to 19 support you in abstaining from the drugs and 20 alcohol, as she requested? 21 A Well, verbally, and she had been quite 22 clear verbally as to this, and had been pretty</p>



<p style="text-align: right;">1721</p> <p>1 <b>bullyish and brutish about wanting me to –</b> 2 <b>telling me that I needed to stop drinking. But</b> 3 <b>drinking was – basically, drinking wine with her</b> 4 <b>and – I suppose maybe from youth, I don't know,</b> 5 <b>but I've always had a pretty high tolerance for</b> 6 <b>alcohol for – and especially it's not spirits,</b> 7 <b>you know, I had a pretty good tolerance for</b> 8 <b>alcohol substances and things of that nature.</b> 9 <b>But there was no – I had no – I've</b> 10 <b>worked with therapists, drug counselors who have</b> 11 <b>actually said the words to me, because I wanted to</b> 12 <b>know, I wanted to know, am I an alcoholic? Am I</b> 13 <b>an alcoholic or is this just the same thing that I</b> 14 <b>did as a kid when I took my mom's nerve pill? Do</b> 15 <b>I have a drinking problem?</b> 16 <b>It essentially came down to this: Do</b> 17 <b>you have a drinking problem, Johnny?</b> 18 <b>MR. ROTTENBORN: Objection. Calls for</b> 19 <b>hearsay, what the doctors told him.</b> 20 <b>THE COURT: I'm not sure he's saying</b> 21 <b>what the doctors told him.</b> 22 <b>MR. ROTTENBORN: I think that's what's</b></p>	<p style="text-align: right;">1723</p> <p>1 <b>drinking. But she did not. She continued. And I</b> 2 <b>didn't make a big deal about. In fact, I would</b> 3 <b>open her wine, I would pour her a glass and that</b> 4 <b>went on for many, many months, you know, in my</b> 5 <b>sobriety. Like I said, I think I was sober for</b> 6 <b>around 18 months.</b> 7 <b>Then, there was a time when I was asked</b> 8 <b>to – and I had been off of alcohol and off of</b> 9 <b>drugs, everything, except for the medication that</b> 10 <b>I'm prescribed, I had to go to London to give a</b> 11 <b>lifetime achievement award to a dear old friend</b> 12 <b>who was an elderly man, great actor called – his</b> 13 <b>name is Christopher Lee, he was a dear friend. I</b> 14 <b>was surprised that he was being surprised by my</b> 15 <b>showing up on stage. I'd just flown in from the</b> 16 <b>States and he said he was very surprised by me</b> 17 <b>arriving to give him this award. And Christopher</b> 18 <b>came up and accepted the award and we walked –</b> 19 <b>they brought us backstage to this beautiful</b> 20 <b>library where we – I was with Christopher and his</b> 21 <b>wife, and a waiter came up and had three glasses</b> 22 <b>of champagne, and Christopher handed one to his</b></p>
<p style="text-align: right;">1722</p> <p>1 <b>about to be testified to.</b> 2 <b>THE COURT: If you can make that clear,</b> 3 <b>I guess.</b> 4 <b>Q Let me ask you a different question,</b> 5 <b>Mr. Depp.</b> 6 <b>A Yes. Just so he can object to another</b> 7 <b>one.</b> 8 <b>Q How often would Ms. Heard drink in your</b> 9 <b>presence while you were in a relationship?</b> 10 <b>A Always. Well, yeah, Ms. Heard drank,</b> 11 <b>she took a shine to a very nice Spanish wine</b> 12 <b>called Vega Sicilia, she and all of her friends</b> 13 <b>did. And, yeah, the wine would come out and</b> 14 <b>Ms. Heard could very easily drink two bottles of</b> 15 <b>wine per night with not a problem.</b> 16 <b>What I found strange was when I did get</b> 17 <b>sober from the – when I was off the opiates that</b> 18 <b>I had been addicted to prior to years before, a</b> 19 <b>couple years before, she asked me if I would stop</b> 20 <b>drinking, to save the relationship. Of course, I</b> 21 <b>stopped drinking. And I always found it odd that</b> 22 <b>in support of me not drinking, that she might stop</b></p>	<p style="text-align: right;">1724</p> <p>1 <b>wife, he handed one to me and then he had the</b> 2 <b>other. And there was a photographer there, and</b> 3 <b>the glass came up to toast and I just, in my head,</b> 4 <b>I thought it's just champagne, you know, a little</b> 5 <b>bit, tink, to toast Christopher and his lifetime</b> 6 <b>achievement award. And so I had had a half a</b> 7 <b>glass of champagne with Christopher Lee and his</b> 8 <b>wife.</b> 9 <b>After that, immediately after that</b> 10 <b>award ceremony, I went to pick up Ms. Heard and go</b> 11 <b>take her to dinner at a restaurant, and I told her</b> 12 <b>that I had had a half a glass of champagne with</b> 13 <b>Christopher. And I thought, listen, it's not</b> 14 <b>like, you know, you're sitting in a pub guzzling</b> 15 <b>pints of snake bites or Guinness or doing shots of</b> 16 <b>Jägermeister, it wasn't even -- at that point, it</b> 17 <b>wasn't even for a need to abate feelings,</b> 18 <b>emotions, it was, literally, a joyous occasion for</b> 19 <b>Christopher. And I said to her, I enjoyed it, you</b> 20 <b>know. It gave me the opportunity to enjoy the</b> 21 <b>actual champagne, the drink. And my appreciation</b> 22 <b>for wine and wine making, that I'd been fascinated</b></p>

<p style="text-align: right;">1725</p> <p>1 with for years and years. And I saw nothing wrong 2 with it. And I said, I'd like to have a glass of 3 champagne. And she was sitting there with a glass 4 of wine. And she -- we were in the restaurant and 5 she absolutely lost it and got up and stormed to 6 the ladies room. And I told my security and 7 driver, I said, I think we have to go. We're 8 going to have to leave. So we left the restaurant 9 and went home. And the mere suggestion of me 10 sipping a glass of champagne or having one glass 11 or two glasses of wine, she went apoplectic. It 12 was I was weak, I was a complete mess, I was an 13 alcoholic, I was -- you know, I was going to ruin 14 everything. You know, your kids are not proud of 15 you. They can't stand what you're doing to 16 yourself. 17 So, at that point, I said to her, okay, 18 listen, how about this: You want to support me 19 not drinking, I never asked you this before, how 20 about you stop drinking? How about you get 21 sobriety, and share the sobriety with me to 22 support me and help me through this.</p>	<p style="text-align: right;">1727</p> <p>1 Q And what about mushrooms? 2 A <b>Mushrooms, a little less. Mushrooms,</b> 3 <b>probably, six, seven times.</b> 4 Q Mr. Depp, do you recall, at the 5 beginning of her opening, Ms. Heard's counsel 6 mentioned that the first time you supposedly 7 struck Ms. Heard was in response to a comment 8 about one of your tattoos? 9 A <b>Yes, I remember.</b> 10 Q And what is your response to that? 11 A <b>It didn't happen. I have never struck</b> 12 <b>Ms. Heard. As I said yesterday, I've never struck</b> 13 <b>Ms. Heard. I have never struck a woman in my</b> 14 <b>life. I'm certainly not going to strike a woman</b> 15 <b>if she decides to make fun of a tattoo that I have</b> 16 <b>on my body. It's like going into someone's</b> 17 <b>journal and picking out things you don't like.</b> 18 She had made mention -- there was no 19 incident of argument when the tattoo thing had 20 been brought up many, many times, and there was 21 really nothing I could do. I've always thought of 22 my body as a journal, if you will, to mark</p>
<p style="text-align: right;">1726</p> <p>1 Q What did she say to that? 2 A No. No. She said no. She said she 3 didn't have a problem. 4 But I have never had a physical 5 addiction to alcohol. I don't. 6 Q How often have you seen Ms. Heard use 7 other illicit drugs in your presence? 8 A Several times. 9 Q And what drugs were those? 10 A Well, she was always quite fond of 11 MDMA, which is ecstasy, and mushrooms. And she 12 had some medications that she was on already that 13 were -- one in particular was kind of a high 14 velocity, speed, if you will, called -- I don't 15 know if I can say the name. Am I allowed to say 16 the name? Doesn't matter. 17 Q That's not necessary. 18 How often did you see Ms. Heard take 19 MDMA? 20 A A dozen times, 20 times, you know, over 21 the course of the years, through the course of the 22 years.</p>	<p style="text-align: right;">1728</p> <p>1 experiences, to mark life experiences. You know, 2 for example, when our first child was born, I had 3 her name tattooed on my -- over my heart, which is 4 where her little head used to be when I'd rock her 5 to sleep. 6 I marked my boy's birth by tattooing 7 myself for him. 8 So, no one can go back, or no one 9 should go back and rewrite their journals. 10 Why did I take such great offense to 11 someone making fun of a tattoo on my body? That 12 allegation never made any sense to me, whatsoever. 13 Q Are there any tattoos that you had that 14 Ms. Heard had an issue with, to your 15 understanding? 16 A Well, the -- well, a tattoo, that I 17 believe is up here (indicating), which used to say 18 Winona forever, was a former girlfriend. And we'd 19 been together for a few years. Winona Ryder, and 20 when we -- when we broke up, how do you ever fix 21 that? I did go back and rewrite my journal to 22 some degree. I took off the last two letters and</p>

<p style="text-align: right;">1729</p> <p>1 had it say "wino forever," just because I thought 2 it was -- I thought it was, again, through pain 3 comes humor. Humor has to come in there at some 4 point, into the pain, and that's how you play it 5 out in your mind. 6 So, I have, I think, sometimes, 7 abstractly, in a sense, so I changed it to wino 8 forever. And any other tattoos -- well, she was 9 very encouraging of me getting a tattoo of her, of 10 her name, or whatever. And I waited a while and 11 then, yes, I did it. I got a full tattoo of her 12 and, ironically, it wasn't long after that that 13 everything started going sideways. I was doing 14 everything I could to bring a smile to her face as 15 opposed to frown, and then the onslaught of 16 whatever problems she was seeing or experiencing. 17 I would try to wake her up with laughter, you 18 know, singing stupid songs in her ear. I 19 genuinely just tried to keep bringing her mood up. 20 Sometimes it worked, many times it didn't. 21 But I tried, and I wanted to try 22 because, as I said, I didn't want to fail. And,</p>	<p style="text-align: right;">1731</p> <p><b>1 that I could resemble the -- it's based on the</b> <b>2 true story of James Bulger, James Whitey Bulger,</b> <b>3 so I had to go in quite early to get the</b> <b>4 prosthetics glued to my face and all that. And</b> <b>5 work, you know, work the whole day. And at the</b> <b>6 end of the night, they would remove the</b> <b>7 prosthetics, which takes a -- if it took</b> <b>8 three hours to put them on, it took about an hour</b> <b>9 to take them off. So on top of what could be</b> <b>10 anywhere between 14-, 16-, 17-hour day of work,</b> <b>11 well, with the application of the makeup and the</b> <b>12 taking off of the applications.</b> 13 Q Was Ms. Heard staying with you in 14 Boston during the entire time that you were making 15 that film? 16 <b>A Yes. Yes, she was.</b> 17 Q And who from your staff was in Boston 18 with you during that time? 19 <b>A Jerry Judge, Keenan Wyatt, Stephen</b> <b>20 Deuters, Nathan Holmes, I believe, and I believe</b> <b>21 Malcolm Connolly was there as well. So I would</b> <b>22 have my assistants, sound technician, security. I</b></p>
<p style="text-align: right;">1730</p> <p>1 at the time, not knowing fully, not understanding 2 fully what I was, if you'll excuse the term, up 3 against, I kept trying. I kept trying. But to 4 know that it was forever, it just got worse. 5 Q Mr. Depp, I would like to fast-forward 6 a little bit to May of 2014. Could you, please, 7 tell the jury what project you were working on in 8 May of 2014? 9 <b>A May of 2014? May of 2014? There were</b> <b>10 a number of films that I made in succession. I</b> <b>11 can't remember if that might have been Pirates --</b> <b>12 no. Mortdecai or May of -- I can't remember.</b> 13 Can you remind me what the May of 2014 14 film was? 15 Q Were you filming Black Mass, in Boston, 16 in May of 2014? 17 <b>A Excuse me. Yes. Yes, yes. Yes, I was</b> <b>18 filming a film called Black Mass in Boston. And</b> <b>19 Ms. Heard did come with me, and I had to, for the</b> <b>20 film, I had to -- there was -- there were very</b> <b>21 early calls to work because I had a number of</b> <b>22 prosthetics glued to my face and blue contacts so</b></p>	<p style="text-align: right;">1732</p> <p><b>1 believe that was it.</b> 2 Q Mr. Depp, we heard yesterday, from 3 Mr. Wyatt, about a flight that you and Mr. Wyatt 4 and Ms. Heard were on from Boston to LA in 5 March -- or, excuse me, May of 2014. 6 Do you remember that? 7 <b>A Yes.</b> 8 Q Can you, please, tell the jury what you 9 remember about that specific flight? 10 <b>A I remember as I was still shooting,</b> <b>11 filming Black Mass, before I did Black Mass, the</b> <b>12 film, my sister, Christi and I were talking about</b> <b>13 the Roxiconones that I had been, again, you know,</b> <b>14 that was the monkey on my back, that she came to</b> <b>15 me, she told me she'd read this book, Dr. Kipper's</b> <b>16 book, and I read Dr. Kipper's book, a good</b> <b>17 majority of it, and then I agreed that I would do</b> <b>18 the detox. I would kick the opiates. But there</b> <b>19 was no time to do it before the film.</b> 20 So, when the nurse, which was nurse 21 Debbie Lloyd, when she came to Boston, she had 22 asked me, "What is your dosage? How many of these</p>

<p style="text-align: right;">1733</p> <p>1 are you taking per day"?</p> <p>2 And, you know, someone who had been</p> <p>3 under, you know, under the kind of lock and key of</p> <p>4 a prescription drug that is highly -- a highly</p> <p>5 addictive, I mean, with built-in barbs. This drug</p> <p>6 does not want you to stop taking it. She asked me</p> <p>7 how many I took per day, or my dosage. And, of</p> <p>8 course, as any person who's addicted and,</p> <p>9 essentially, a fool to the drug, and you know how</p> <p>10 important it is because you have felt the sting</p> <p>11 when it doesn't -- when you don't have it.</p> <p>12 So I agreed to the detox. And she</p> <p>13 asked me how many I took. I told her, obviously,</p> <p>14 more than I was taking, purely because when you're</p> <p>15 in that frame of mind, the one thing that you do</p> <p>16 not want to -- a situation you don't want to find</p> <p>17 yourself in is having no access to the thing that</p> <p>18 will make you, not high, it will make you -- it</p> <p>19 gets you -- you only get better from it. If you</p> <p>20 start to get the shakes and the tremors and the,</p> <p>21 you know, you could feel this traveling into your</p> <p>22 system, your receptors are out en masse, and your</p>	<p style="text-align: right;">1735</p> <p>1 with me. And I had taken two of these opiates,</p> <p>2 these Roxicodones, and I can tell you now, some of</p> <p>3 you may be very, very aware of this, opiates are</p> <p>4 extreme downers. So if you have enough opiates in</p> <p>5 you, you will essentially go on what's called the</p> <p>6 nod. You'll just drop into sleep. So I've heard</p> <p>7 the words "blackout" used and -- there's a grave</p> <p>8 difference between a blackout from alcohol abuse,</p> <p>9 because that is a person who has ingested enough</p> <p>10 alcohol to render them -- they can still behave</p> <p>11 and they can still stand and talk and scream and</p> <p>12 yell and cry and whatever they do and never</p> <p>13 remember a thing. And, generally, they're always</p> <p>14 embarrassed by it. A blackout is a very, very</p> <p>15 different animal to the opiate taking you into</p> <p>16 dreamland. So when I arrived on the plane, I was</p> <p>17 not feeling any pain, and I knew that she was</p> <p>18 ready for some kind of brawl, and I sat on the</p> <p>19 plane drawing. I was drawing in my notebook. She</p> <p>20 would verbally heckle, hassle, accuse, poke, prod,</p> <p>21 physically, you know, physically poke and prod,</p> <p>22 psychology, emotionally. It just -- and finally,</p>
<p style="text-align: right;">1734</p> <p>1 receptors are demanding that drug. If you don't</p> <p>2 give the drug to the receptors, you will start</p> <p>3 going into a pretty nasty withdrawal, and it</p> <p>4 can -- which, you know, could go into seizures,</p> <p>5 you could go into pretty nasty seizures.</p> <p>6 So, I told Debbie Lloyd more than was</p> <p>7 necessary so that I could always have one or two</p> <p>8 in my pocket on the just-in-case, so I didn't find</p> <p>9 myself, you know, on a plane or, you know,</p> <p>10 anywhere without one in my pocket to stop the</p> <p>11 inevitable body cramps and nausea and stomach</p> <p>12 cramps and seizure of the bones and shaking and,</p> <p>13 also, it's quite an emotional ride as well.</p> <p>14 So, yes, I -- before the flight, Amber</p> <p>15 and her assistant, Savannah McMillan wanted to be</p> <p>16 picked up in New York and then have the plane fly</p> <p>17 to Boston to pick me up, to bring us back to</p> <p>18 Los Angeles.</p> <p>19 We had spoken the night before. We had</p> <p>20 argued the night before. She was most definitely</p> <p>21 looking for a -- she was looking for a fight,</p> <p>22 actively searching for a way to instigate a fight</p>	<p style="text-align: right;">1736</p> <p>1 you know, as was my -- the one thing I learned, if</p> <p>2 you're going to hide someplace from somebody, go</p> <p>3 straight into the bathroom. So, I walk back into</p> <p>4 the back of the plane, I grabbed a pillow, and I</p> <p>5 went into the bathroom, locked the door, and laid</p> <p>6 down on the bathroom floor and went to sleep. And</p> <p>7 that's where I remained for the rest of the</p> <p>8 flight.</p> <p>9 Q How much, if any, alcohol had you had</p> <p>10 before you got on the flight?</p> <p>11 A I honestly don't recall having any</p> <p>12 alcohol. I mean, maybe there was the sort of</p> <p>13 glass of champagne when you got on the plane or</p> <p>14 something like that, the initial thing, people</p> <p>15 have glasses of wine. People also tend to have a</p> <p>16 few drinks before a plane takes off because some</p> <p>17 people don't like the turbulence and the this and</p> <p>18 the that, so it's a little bit of a liquid</p> <p>19 courage, you know.</p> <p>20 But certainly, after ingesting two of</p> <p>21 the Roxicodones, alcohol was not necessary.</p> <p>22 So I can tell you now that I was not</p>

<p>1737</p> <p>1 drinking to excess, certainly not. And if I had, 2 I probably had been in the bathroom hugging 3 porcelain as opposed to sleeping on a pillow. 4 Q Who else was on that flight, that you 5 can recall? 6 A I remember Jerry Judge was on the 7 flight, Savannah was on the flight, Ms. Heard, 8 Keenan Wyatt, Stephen Deuters. I believe that's 9 it. 10 Q What do you recall happening after you 11 arrived back in LA? 12 A Well, generally, what would happen when 13 we'd land was everybody would go their separate 14 ways. There were several cars waiting, so Keenan 15 had his car, and we'd get in the car and leave. I 16 mean, do you mean once we got back to downtown 17 or... 18 Q Did you and Ms. Heard go back to the 19 same home together after that flight? 20 A No, I don't believe -- no, we didn't, I 21 don't believe. I think she had decided -- if this 22 is the time, I'm pretty sure. I believe she had</p>	<p>1739</p> <p>1 Q Mr. Depp, do you recall why you were 2 flying from Boston to LA in May of 2014? 3 A I can't remember if it was a break from 4 the film or if I'd finished the film, and that was 5 before we went -- well, before I was supposed to 6 go to the island to detox from the opiates. 7 MS. MEYERS: All right. I think I'm 8 about to switch gears, so this is a good time for 9 a break. 10 THE COURT: Ladies and gentlemen, we 11 will have our morning recess. Please don't do any 12 outside research and don't talk to anybody about 13 the case. Okay. Thank you. 14 (Whereupon, the jury exited the 15 courtroom and the following proceedings took 16 place.) 17 THE COURT: And, sir, again, since 18 you're still on the stand, do not discuss your 19 testimony with anybody, including your attorneys, 20 okay? 21 THE WITNESS: All right. 22 THE COURT: We'll come back at 11:35.</p>
<p>1738</p> <p>1 decided to check herself into the Chateau Marmont. 2 There's so many of these, it's hard to sort of 3 keep them all straight. 4 Q Who would have paid for Ms. Heard to 5 stay at the Chateau Marmont? 6 A I would have paid for it. If she 7 wanted to go to the Chateau Marmont, I wasn't 8 going to let her pay for it, no matter the 9 circumstances. I wasn't going to let her pay for 10 it because I knew that that might get expensive 11 for her. So, generally, I would take care of 12 things of that nature. 13 Q And why -- did Ms. Heard tell you why 14 she was staying at the Chateau Marmont? 15 A No. But I mean, she was -- she was 16 clearly upset and she was irate, and I can't say 17 that it was a bad idea for her to stay at the 18 Chateau Marmont at that time. I don't know 19 whether she went to the Chateau, since she still 20 had her apartment on Orange, I believe, and the 21 penthouse. Because I could have gone to Sweetzer. 22 But she went to the Chateau Marmont.</p>	<p>1740</p> <p>1 (Recess taken from : 2 to : ) 3 THE BAILIFF: All rise. Please be 4 seated and come to order. 5 THE COURT: All right. Ready for the 6 jury? 7 MR. CHEW: Yes, Your Honor. 8 THE COURT: All right. 9 (Whereupon, the jury entered the 10 courtroom and the following proceedings took 11 place.) 12 THE COURT: All right. Thank you. You 13 can be seated. Thank you. 14 All right. Your next question. 15 BY MS. MEYERS: 16 Q Thank you. Mr. Depp, who's Dr. Kipper? 17 A Dr. Kipper is a -- he's been my doctor 18 since -- ever since I met him, I believe that's 19 May of 2014, around there, in Boston. 20 Q And why were you connected with 21 Dr. Kipper? 22 A My sister Christi knew, of course, that</p>

<p style="text-align: right;">1741</p> <p>1 I had been addicted to the opiates, and she was 2 concerned. And she brought me his book and talked 3 to me, heart to heart, and asked me if I would be 4 willing to go through the detox. 5 Q And what was your answer? 6 A Yes, of course. 7 Q And you mentioned Debbie Lloyd. Can 8 you, please, explain to the jury who she is? 9 A Debbie Lloyd is a nurse who my doctor, 10 Dr. Kipper, had assigned to my case to be the -- 11 to oversee the detox and deliver the meds, the 12 medications, to me that would help with my -- with 13 the effects of withdrawal that one goes through 14 to, essentially, try and knock you out so that you 15 don't go through the nastiness of the affair. 16 Q Did Ms. Lloyd stay on, after the detox 17 process, as your nurse? 18 A Yes, she did. 19 Q And when you were under Dr. Kipper's 20 care, how often did you see Ms. Lloyd? 21 A On location, every day. Yes, on 22 location, every day, even when -- after a year or</p>	<p style="text-align: right;">1743</p> <p>1 A Debbie -- Nurse Debbie Lloyd traveled 2 with me on a plane, Ms. Heard. And I believe that 3 was it on the plane to go to the island for the 4 detox. I was not bringing security. I was not 5 bringing assistants. In fact, initially, my 6 sister, Christi was going to go there to help 7 Ms. Lloyd and the doctor through the detox, which 8 made perfect sense, since that -- the whole thing 9 had been born out of her desire for me to get 10 clean. So, initially, it was supposed to be 11 Christi coming in place of Ms. Heard. There was a 12 great part of me that was very uncomfortable with 13 Ms. Heard coming along for that detox because as 14 things could fluctuate very rapidly in our 15 relationship, I was wary that those things would 16 come up during what needed to be a very straight 17 detoxification of these substances. And I was 18 well aware that it was not going to be pleasant. 19 I was well aware that I was going to go through 20 quite a bit of physical changes, physical -- yes, 21 I was afraid that it would be too much for her, 22 and I also felt that she might be too much for me</p>
<p style="text-align: right;">1742</p> <p>1 two, I was still seeing her at least on a biweekly 2 basis, two to three times a week. 3 Q When did you start the detox process 4 that you mentioned? 5 A I know that it's -- I believe it was 6 around -- it was in August, July or August of 7 2015, '14. I cannot remember the year. '14, I 8 guess. 9 Q And where did you do this detox 10 process? 11 A We did -- the detox process happened 12 on -- I have a place in the Bahamas. Never 13 comfortable saying this, but it's an island. It's 14 a very strange thing to say. But I thought that 15 that would be the best place, the most private 16 place, where there were no worries of paparazzi or 17 any of that. So it was a place where I could 18 literally be -- the only place where I can have 19 actual anonymity. So I thought that would be the 20 best place to do it. 21 Q Who came with you down to the island 22 for the detox?</p>	<p style="text-align: right;">1744</p> <p>1 at the time. 2 Q So, then, why did Ms. Heard come down 3 to the island with you during the detox process? 4 A She insisted, and she switched places 5 with Christi. 6 Q Could you, please, describe, for the 7 jury, Mr. Depp, what it feels like to go through a 8 detox from opioids. 9 A I would say the best way to describe it 10 is it feels like you're -- it feels like the 11 inside of you, the very inside of you, is trying 12 to escape the body. So, it's -- it becomes, 13 obviously, very physical and, so, therefore, 14 you'll go into a withdrawal, would mean that you 15 would go into, you would have immense cramps in 16 your stomach, your muscles would seize, my body 17 would shake, the pain is like nothing I've ever 18 experienced before. 19 Part of it was -- the best way to 20 explain it, for example, there was a situation 21 that -- when we were on the island and I was going 22 through the detox, and it was hitting pretty hard</p>

<p style="text-align: right;">1745</p> <p>1 at that point, and Ms. Heard had made a deal with 2 Nurse Debbie and Dr. Kipper to stay at their end 3 of the island and that she would administer the 4 drugs to me, administer the medications that I 5 needed to not go into the, for lack of a better 6 word, these intense, sharp, painful, 7 heebie-jeebies, and there was a moment when I 8 could feel my body starting to tense and I could 9 feel the withdrawals coming on, and they'd come on 10 quick, and they're not discreet. They go straight 11 for the jugular. I mean, like I said, when your 12 receptors are in full bloom and begging for the 13 substance, the drug, the opiates that my body had 14 become used to, these receptors that were being 15 fed by, there was a moment when it was coming on 16 very fast and I was sitting on the couch in the 17 little house that we all saw on the island, 18 Ms. Heard was at the -- she was in the sort of 19 kitchen area and she was chopping vegetables, I 20 remember, and I think it was around 2:30 in the 21 afternoon and the effects of the withdrawals were 22 really coming on, and I said to Ms. Heard, "I'm</p>	<p style="text-align: right;">1747</p> <p>1 So the only thing that one can do in 2 that situation is you have to trick the body. You 3 have to manipulate your body away from those -- 4 well, you have to trick the body to get away from 5 the receptors. So, the only thing that one can do 6 is you go straight to the shower and you put it on 7 scalding water and you stand underneath the 8 scalding shower, and since you're burning, the top 9 of, you know, your skin is burning from the heat 10 of the water. And what that would do is it would 11 trick the nervous -- the nerves away from the 12 receptors because they had -- now they had an 13 immediate problem that needed to be dealt with, 14 the nerves. So what it does is the scalding 15 shower would reverse those nerve endings and they 16 would go up to the top of the skin because there 17 was a problem there. 18 So that's how you -- that's how I was 19 able to bypass those withdrawal symptoms at times. 20 It doesn't fully take them away, but what it does 21 is it tricks your body into thinking that there's 22 something going horribly wrong on time, so it</p>
<p style="text-align: right;">1746</p> <p>1 going to need the meds now." 2 And she said -- she looked at the clock 3 and she said, "It's not time." I said, "No, no, 4 you don't understand." This is not about clocks 5 and watches and things. I'm going into -- and it 6 was visible. And I hate to have -- I hate saying 7 this, and I hate to have to admit this, but that 8 was -- I believe that was about the lowest point 9 in my life. That was the lowest I'd ever felt as 10 a human being because I had to say, "Please. 11 Please, may I have the meds," because it's really 12 kicking in. And she was adamant. Nope, it's not 13 time. It's not time. 14 So, in explaining how these withdrawals 15 start to take over your body, when I was begging, 16 at that point, for the meds, I found that I had 17 sort of rolled off the couch and I was sitting on 18 the floor, crying. Tears streaming down my face 19 begging another human being to please, please, 20 give me the meds that will take this away. And 21 she would not. She was adamant that, nope, it's 22 not time. 4:00.</p>	<p style="text-align: right;">1748</p> <p>1 keeps them away from the receptors. And after 2 that, I had a conversation with Nurse Debbie and 3 with Dr. Kipper, and I said I don't believe -- I 4 told them that she had denied me the meds when I 5 was in need and then I told them that I don't 6 think that this is going to work here anymore. I 7 think we have to leave the island. And I need to 8 be -- she can't be with me while I'm going through 9 the rest of this detoxification. 10 So I told them we should leave the 11 island. I told -- I asked them if they understood 12 what I was doing, and they did. 13 So we went back to Los Angeles and then 14 I asked Ms. Heard if she would, please, allow me 15 five days, seven days, whatever it took, to get 16 out of -- to get done with -- finished with the 17 rest of this horrific detox and the pain. 18 Q Did Ms. Heard give you that time? 19 A She did. Reluctantly, yes. I was 20 immediately accused of throwing her out. I was 21 accused of abandoning her. I was accused of not 22 appreciating all that she had done to get me to</p>

<p style="text-align: right;">1749</p> <p>1 this point where I was, which was kind of an 2 interesting argument for me. I begged her, 3 please, can I get a place at the Beverly Hills 4 Hotel, I'll get you and your friends a bungalow at 5 the Beverly Hills Hotel where you can all stay 6 together and have a grand old flag. You can have 7 fun. You can do whatever you want and you don't 8 have to sit around Mr. Shaky. And she wasn't 9 happy about it, but it was very necessary. 10 So, she did eventually leave for about 11 five days or so, and I sat in a -- after a few 12 days, I sat in a metal chair with one song on 13 the -- one song on a loop that I could focus on 14 the lyrics and the power of the song to help me 15 get through it. And even once the effects started 16 to go away, that is the pain, I was still in 17 this -- something strange that happens, you feel 18 electricity in your body. You feel this electric, 19 very foreign. And you're just sitting there, 20 like, going through it. And I didn't understand 21 what the electricity was until, probably -- and 22 this lasted -- the electricity, that feeling</p>	<p style="text-align: right;">1751</p> <p>1 A It was indeed successful, yes. It was 2 indeed successful. And as I said, you know, this 3 newfound -- well, it was electricity was kind of 4 jarring, and I suddenly felt this energy. And, 5 like I said, I realized what was actually 6 happening was I was simply feeling things without 7 being provided anything to really numb it. So I 8 could -- I was feeling for the first time in many 9 years. There was nothing to cover or to hide or 10 to suppress the feelings. It was just me and that 11 electricity that I got to know as the -- what 12 actually feeling feelings was like, in many, many 13 years. 14 Q Mr. Depp, how long were you with 15 Ms. Heard before the two of you got married? 16 A Four years. Four years, maybe, was it? 17 2012 or '13 to 2000 -- we were married on 18 February 3rd, I believe, 2016. 19 Q And where was that wedding? 20 A Excuse me. Since my mother -- my mom, 21 Betty Sue, who, by this time in her life, had 22 mellowed quite a bit, and she'd been through a</p>
<p style="text-align: right;">1750</p> <p>1 lasted for a month, two months, and I finally 2 realized, at a certain point, what that 3 electricity was, and I was feeling, that's what it 4 was. I was actually feeling without the aid of 5 the drug, without the aid of any drugs. I mean, I 6 had refused, with Dr. Kipper and Nurse Debbie and 7 Amber at the table, before she left for the hotel 8 with her friends, I had refused to continue taking 9 the phenobarbital and the lithium because, to me, 10 it was just another drug in the way. It seemed 11 like it was just another hurdle to get over, and I 12 would rather just get it out of my system now and 13 move forward. Maybe I wouldn't have had the 14 electricity. Maybe I wouldn't have felt as 15 quickly. But I didn't want to take phenobarbital 16 and lithium and Seroquel and Neurontin and all 17 these other things. And the worst of the two, I 18 believe, was the phenobarbital and the lithium. 19 So, I just -- I went through that mood and the 20 kick without those two drugs. 21 Q And as difficult as that process was, 22 was it successful?</p>	<p style="text-align: right;">1752</p> <p>1 number of illnesses. Since my mom was ill and one 2 doctor had told me that she had no more than 3 three months, I went to Ms. Heard and we knew we 4 were going to do something on the island, but 5 we -- I decided, or asked her, and we both agreed, 6 that her parents would come to my mom's house so 7 that my mom could witness the wedding and be there 8 and all that. So we held it at my mom's house for 9 that reason. My children were there and 10 Ms. Heard's family and friends, and so that was, 11 yes, February 3rd, 2016. 12 Q And is that the ceremony that you 13 mentioned or the celebration on the island? 14 A No, no. Was it '15? I don't know. 15 Sorry. 16 I'm sorry, what was your question? 17 Q I said, is the date that you just 18 mentioned, is that the actual ceremony or is that 19 the date that you celebrated on the island? 20 A No. The actual ceremony, the actual 21 wedding, wedding that goes down on paper was 22 February 3rd at my mom's, at Betty Sue's house.</p>



1753	<p>1 And then we all immediately left for the -- for 2 the island for the -- well, the dream wedding, I 3 guess. 4 Q Whose idea was it to get married at 5 that time? 6 A Well, I had proposed to Ms. Heard a 7 couple of years before, I believe, and so we had 8 talked occasionally about when would be the right 9 time, in terms of between schedules and how can we 10 make this so that we could actually have a wedding 11 and a honeymoon and then go on to do the work. 12 At first, my sister Christi was 13 handling all of the details and things, for 14 example, that Ms. Heard wanted for the wedding. 15 She and Raquel had decided that they were going to 16 design what the wedding was going to be like. 17 At a certain point, Ms. Heard was 18 getting very, very -- she started to get very 19 upset with Christi, my sister, and accused me and 20 Christi of trying to slow the process. 21 Q Were you trying to slow the process? 22 A No. I -- no, I wasn't trying to slow</p>	1755	<p>1 all, maybe there were -- seems like there could 2 have been no more than 20 people, 25 people, 3 maybe. 4 Q Was there any alcohol served at the 5 wedding? 6 A Yes, there was alcohol served at the 7 wedding. It was champagne. It was all the 8 accoutrements, yes. 9 Q And was anyone ingesting any illegal 10 drugs at the wedding? 11 A Yes. 12 Q And who was doing that? 13 A Well, there was a schedule that was 14 written out and printed out and sent out so that 15 everyone would know exactly the time that 16 everything would happen. And on that sheet, the 17 schedule, there was a, like, some kind of 18 rehearsal type thing. There was also -- there was 19 a great dilemma in who was going to be who. 20 That's where the argument between Ms. Pennington 21 and iO Tillett Wright -- 22 Q Mr. Depp, who did you observe taking</p>
1754	<p>1 the process. But what I couldn't understand was 2 when Ms. Heard suddenly -- Ms. Heard and her 3 friend, Raquel Pennington had decided to take all 4 that away from my sister, and then they jumped in 5 and -- 6 MR. ROTTENBORN: Objection, Your Honor. 7 Testimony about what Ms. Pennington had decided is 8 hearsay. 9 MS. MEYERS: We can move on from that. 10 THE COURT: All right. I'll sustain 11 the objection. 12 Next question. 13 THE WITNESS: Good one. 14 Q Directing you to the celebration on the 15 island, who was invited to that celebration? 16 A Close friends, family, obviously, my 17 father, my dad came, my son was there. He was my 18 best man. My daughter, Lily-Rose, did not come to 19 the wedding. She and Ms. Heard were not on 20 particularly great terms for several reasons. 21 There were a number of -- number of Ms. Heard's 22 friends and her family. So I would say, all in</p>	1756	<p>1 drugs at the wedding? 2 A A number of people were taking MDMA. 3 As I said, the list, there was a -- after the 4 wedding, there was a -- it was, like, dinner, 5 dancing and drugs on the schedule that came from 6 Ms. Heard and Ms. Pennington. 7 So, Amber, Raquel, a couple of friends 8 of mine, Savannah, her assistant, Tillett Wright. 9 All of her gang were partaking in the MDMA. 10 Q What, if any, MDMA -- what, if any, 11 drugs did you take that day? 12 A To be honest with you, I was -- I mean, 13 I don't know how much MDMA they had, but, for me, 14 that was -- for me to have taken MDMA would have 15 been a waste of the drug, if you understand what I 16 mean. It would have been, essentially, taking 17 someone else's high because I -- it wouldn't have 18 an effect on me. 19 Q So how much -- how many drugs did you 20 actually take that day? 21 A The day of our wedding? 22 Q Yes.</p>

<p style="text-align: right;">1757</p> <p>1 A I smoked marijuana and I don't remember 2 drinking. I don't remember that I was drinking 3 then. This was right before she was going to 4 London to do, I believe, London Fields, and I was 5 going off to Australia to do Pirates 5. 6 I'm pretty positive, at that point, I 7 wasn't partaking of alcohol. My drug of choice 8 is – or was, is marijuana. That's all I – that 9 was fine for me. 10 Q When you -- 11 A So dipping into a little tiny baggie 12 of, you know, licking your finger and dipping into 13 a little tiny communal bag of MDMA, it wasn't 14 going to – it was pointless for me. 15 Q When you and Ms. Heard got married, did 16 you have a prenuptial agreement in place? 17 A No, we did not. No. 18 Q And why not? 19 A There always seemed to be some reason 20 or another why she wouldn't – either wouldn't 21 discuss it, or if we did discuss it, it became an 22 issue that would turn into a – it would</p>	<p style="text-align: right;">1759</p> <p>1 A Yeah. Dr. Kipper came down a bit 2 later. 3 Q Mr. Wyatt testified yesterday that he 4 observed you have a meeting with Sean Bailey in 5 Australia. 6 Do you remember that? 7 A Yes. 8 Q And can you please tell the jury who 9 Sean Bailey is? 10 A Sean Bailey, at that time, I believe he 11 was the number three man at Disney, in terms of 12 hierarchy. He was upper echelon Disney. So he 13 was under Bob Iger, and initially under Dick Cook, 14 who was removed from Disney for some reason. 15 So, yes, he was the number three man at 16 Disney. 17 Q And why were you having a discussion 18 with Mr. Bailey? 19 A The discussions that I would have -- 20 was having with Mr. Bailey, with Sean Bailey were 21 they had to do -- well, as I think we've 22 established, you know, I have always, from the</p>
<p style="text-align: right;">1758</p> <p>1 springboard into unpleasantness and then 2 arguments. And then it was also too late. At a 3 certain point, it was just too late. 4 So, then, the idea of a postnup 5 agreement was brought up to Ms. Heard, and that 6 was in Australia. That was the beginning of the 7 Australian fight. 8 Q Let's talk about Australia, then. But, 9 first of all, why were you in Australia? 10 A I was working on Pirates of the 11 Caribbean 5. 12 Q And who from your team was with you in 13 Australia? 14 A Jerry Judge, Malcolm Connolly, Nathan 15 Holmes, Stephen Deuters, Keenan Wyatt. I believe 16 that was it. Oh, and – yeah, yeah, that was it. 17 Q Was Ms. Lloyd with you in Australia as 18 well? 19 A Oh, yeah, Ms. Lloyd. Ms. Lloyd 20 traveled to Australia with us. 21 Q And did Dr. Kipper come down to 22 Australia at any point?</p>	<p style="text-align: right;">1760</p> <p>1 beginning of those series of films, I had always 2 rewritten my character's words and jokes, if you 3 will, and situational comedy and things that I 4 would add, and Mr. Bailey was very complimentary 5 about some of the things that I had done. He's -- 6 you know, he would come over to me laughing after 7 a take. 8 MR. ROTTENBORN: Objection. Calls for 9 hearsay. 10 MS. MEYERS: Your Honor, this is just 11 discussing, generally, what they were talking 12 about. 13 THE COURT: He was getting specific. 14 I'll sustain that. 15 If you want to continue, that's fine. 16 Q Mr. Depp, was Ms. Heard in Australia 17 with you? 18 A She came a little later, yes. 19 Q Do you recall when she came down? 20 A I don't recall -- well, no, I do 21 recall. It was March. It was March. 22 Q And what happened when Ms. Heard came</p>

1761	<p>1 to visit you in Australia?</p> <p>2 <b>A Ms. Heard was upset because, as I</b></p> <p>3 <b>stated earlier, as it was too late for a prenup</b></p> <p>4 <b>agreement, there was a discussion of postnup</b></p> <p>5 <b>agreement. And I had called my lawyer at the time</b></p> <p>6 <b>and asked him if he could have one of his lawyers</b></p> <p>7 <b>sit down with Ms. Heard and give her a basic</b></p> <p>8 <b>rundown of what a postnuptial agreement meant, and</b></p> <p>9 <b>I was told that they showed her --</b></p> <p>10 MR. ROTTENBORN: Objection. Hearsay.</p> <p>11 MS. MEYERS: Your Honor, this is</p> <p>12 something he asked an attorney. It's not a</p> <p>13 statement of fact that's being offered for its</p> <p>14 truth.</p> <p>15 THE COURT: I'll sustain the objection.</p> <p>16 Next question.</p> <p>17 MS. MEYERS: Okay.</p> <p>18 Q What did Ms. Heard tell you she was</p> <p>19 upset about when she arrived in Australia?</p> <p>20 <b>A Ms. Heard told me that the attorney</b></p> <p>21 <b>that she met with was rude and dismissive and all</b></p> <p>22 <b>she was being shown was an example of a</b></p>	1763	<p>1 <b>trying to trick her into essentially getting</b></p> <p>2 <b>nothing if something were to happen.</b></p> <p>3 Q And how did you respond to Ms. Heard?</p> <p>4 <b>A I just told her those are not my</b></p> <p>5 <b>intentions, you know. And at a certain point, you</b></p> <p>6 <b>don't know what to do. I mean, the person is</b></p> <p>7 <b>telling you -- she's telling you "You don't trust</b></p> <p>8 <b>me. You don't trust me. You don't trust me."</b></p> <p>9 <b>And I can't speak about legal documents. I can't</b></p> <p>10 <b>speak legalese. I can't explain to her these</b></p> <p>11 <b>things. All I could do was try to calm her down</b></p> <p>12 <b>and say that I was not out to screw her over or</b></p> <p>13 <b>put her in a position that was uncomfortable --</b></p> <p>14 Q Did that work?</p> <p>15 <b>A -- and to stop normal things to do.</b></p> <p>16 <b>It did not work, no. It escalated and</b></p> <p>17 <b>escalated and turned into madness, chaos,</b></p> <p>18 <b>violence.</b></p> <p>19 Q Can you please describe that chaos and</p> <p>20 violence?</p> <p>21 <b>A Yes. She was irate. She was irate and</b></p> <p>22 <b>she was possessed. And when I tried to remove</b></p>
1762	<p>1 <b>postnuptial agreement.</b></p> <p>2 <b>Ms. Heard, then, stated to me -- she</b></p> <p>3 <b>was very upset. She stated to me that what she</b></p> <p>4 <b>had said was she said to the lawyer, the woman,</b></p> <p>5 <b>that this -- Johnny can't -- he doesn't know about</b></p> <p>6 <b>this. He doesn't know that this is what this is.</b></p> <p>7 <b>No way he would agree to this.</b></p> <p>8 <b>And what Ms. Heard, then, expressed to</b></p> <p>9 <b>me was that the lawyer, the woman had laughed at</b></p> <p>10 <b>her and said, "Oh, he knows. Yes, he knows</b></p> <p>11 <b>everything," which sent her into a tailspin.</b></p> <p>12 <b>So by the time she arrived in</b></p> <p>13 <b>Australia, that was sunk very deep into her</b></p> <p>14 <b>psyche. I mean, so much so that what really</b></p> <p>15 <b>surprised me was that she kept saying, "I'm not</b></p> <p>16 <b>even in your will. I'm not even in your will."</b></p> <p>17 <b>I thought that was an odd thing to say,</b></p> <p>18 <b>especially since I don't think anybody had had</b></p> <p>19 <b>time to change wills or anything of that nature.</b></p> <p>20 <b>So those things just didn't -- it felt</b></p> <p>21 <b>wrong. And she could not let go of the fact that</b></p> <p>22 <b>I was in on this postnup agreement and that I was</b></p>	1764	<p>1 <b>myself, as I normally would from a situation, as</b></p> <p>2 <b>she's hammering with sort of brutal words and, you</b></p> <p>3 <b>know, I don't -- pardon my language, but I</b></p> <p>4 <b>remember that it wasn't nice, sort of being called</b></p> <p>5 <b>an ass kisser to lawyers or a pussy that didn't</b></p> <p>6 <b>fight for her or stand up for her. I, again,</b></p> <p>7 <b>tried to remove myself from the situation, but to</b></p> <p>8 <b>no avail, as I literally -- the house that they</b></p> <p>9 <b>had rented for me in Australia was quite a large</b></p> <p>10 <b>place. It was quite a bit of an elaborate and a</b></p> <p>11 <b>lot of rooms, some extra rooms. So I would just</b></p> <p>12 <b>go to -- well, I'll just cut to the chase. I</b></p> <p>13 <b>think that I ended up locking myself in about, at</b></p> <p>14 <b>least, nine bedrooms, bathrooms that day as she</b></p> <p>15 <b>was banging on the doors and screaming obscenities</b></p> <p>16 <b>and wanting to have a physical altercation.</b></p> <p>17 Q So how did it come to be that your</p> <p>18 finger became injured?</p> <p>19 <b>A There was one point where I stayed in</b></p> <p>20 <b>a -- sitting on the bathroom floor, the door</b></p> <p>21 <b>locked, she's banging away, banging away,</b></p> <p>22 <b>screaming blah, blah, blah, and suddenly she</b></p>

<p>1765</p> <p>1 stopped, and I could hear her walk away. I could 2 hear her sort of receding into the distance, if 3 you will. You know, so, yes, it became very 4 emotional because you can't win for losing. It 5 was nothing I could do to make her understand that 6 I had -- if that lawyer had, in fact, done that, 7 and I did call my lawyer at the time, Jake Bloom, 8 and I had him get these people on the phone. And 9 I -- I'm ashamed to say that I had taken, at that 10 point, when I was on the phone with them, I had 11 taken Ms. Heard's words to heart and I laid out a 12 ration of very -- I was very upset that she was 13 pushed to that limit because I believed it, and, 14 in fact, none of it had happened. So it was all 15 getting too crazy. And, again, I had been sober 16 for many, many months from alcohol and substances, 17 aside from the marijuana, and I got -- I left the 18 place, the room that I was hiding, not hiding in, 19 locked myself into, and I went downstairs in the 20 house -- downstairs in the house, as soon as you 21 walk in the house, you can go upstairs or 22 downstairs. And downstairs, there was sort of a</p>	<p>1767</p> <p>1 drank it. Ms. Heard was flinging insults left, 2 right, and center, and she, then, grabbed that 3 bottle and threw that at me. And the way that 4 the -- the way that the bar was situated, and 5 where Ms. Heard was, so if -- if I could show you. 6 So if -- this is the bar where the 7 glass was and the bottle. This was the bar and 8 I'm sitting here. She grabbed the bottle and she 9 would go there, she went there. And so, I was 10 leaning like this (indicating) in the chair 11 looking at her, first bottle went, then I got the 12 other bottle, shot, takes the second bottle, which 13 was the larger one, I'm in this position again, 14 and my hand is on the edge of the bar like that 15 and leaning over the fingers like that 16 (indicating), and she threw the large bottle and 17 it made contact and shattered everywhere. 18 And I honestly didn't -- I didn't feel 19 the pain at first, at all. I felt no pain 20 whatsoever. What I felt was I felt heat. I felt 21 heat and I felt as if something were dripping down 22 my hand, you know. And then I looked down and</p>
<p>1766</p> <p>1 rec area, pool table and such, and there was a 2 bar. And I was a mess, I was a wreck. I was 3 shaking and I just didn't understand why all this 4 was happening. 5 So, I went behind the bar, I grabbed a 6 bottle of vodka that was there and a shot glass, 7 and sat at the bar, she was nowhere around, and I 8 poured myself two or three stiff shots of the 9 vodka, first taste of alcohol I had had in a long 10 time. And then she came down to the bar and found 11 me there, and, of course, started screaming, oh, 12 you're drinking again, oh, the monster, and all 13 that. So she reached -- she walked up to me and 14 she reached and grabbed the bottle of vodka and 15 then just kind of stood back and then hurled it at 16 me. And it just went right past my head and 17 smashed behind me. 18 So, I stood up and I walked behind the 19 bar and there was a larger bottle of vodka, the 20 kind with the handle, you know, on it. I grabbed 21 that and I went and I sat in my seat again. I 22 opened the bottle and I poured myself a shot and</p>	<p>1768</p> <p>1 realized that the tip of my finger had been 2 severed, and I was looking directly at my bones 3 sticking out and the meaty portion of the inside 4 of your finger, and it was -- blood was just 5 pouring out. And at that point, I think that I 6 went into some sort of -- I don't know what a 7 nervous breakdown feels like, but that's probably 8 the closest that I've ever been. I didn't -- 9 nothing made sense. And I knew, in my mind, and 10 in my heart, this is not life. This is not life. 11 No one should have to go through this. 12 And, as I said, this feeling of 13 nervous, being in the middle of some sort of 14 nervous breakdown, I started to write with my 15 blood, in my own blood, on the walls, little 16 reminders from our past that essentially 17 represented lies that she had told me and lies 18 that I had caught her in. And then the next 19 thing, you know, amongst all the madness, I would, 20 again, hide in the bathroom, or wherever, and I 21 texted Dr. Kipper and I said, you might want to 22 come over, I've cut my finger off here.</p>

1769	1 Q Which finger was cut, Mr. Depp? 2 A It's the middle – it's the 3 funny-looking one. It's the middle finger here. 4 You can see the – well, you can see all the sort 5 of – from the initial wound, this – all these 6 bones up here were crushed and it looked like a 7 Vesuvius, you know. So this – oops, excuse me. 8 So this part of my finger now, because of not 9 having use of the tip, this is basically arthritis 10 that kicks into the joint once that upper part of 11 the finger is mangled. 12 Q So is that your right middle finger? 13 A Right middle, yes. 14 Q And is that your dominant hand? 15 A Yes, it is. Yes. 16 Q Mr. Depp, after Ms. Heard threw the 17 vodka bottle at you and severed your finger, what, 18 if anything, did she say when she saw the injury? 19 A I don't recall anything but just it was 20 almost like white noise. Just someone yelling. 21 It was just a high-pitched, constant attack of 22 insults. It was just jumbled words to me, in a	1771	1 they took me to -- first, we went to Malcolm's 2 apartment, where he was staying while we were 3 shooting the film, and tried to clean my hand 4 because I had worked the day before and, 5 obviously, when you're playing a pirate, 6 Captain Jack or whatever, you're covered -- they 7 paint on with alcohol, rubbing alcohol, they paint 8 dirt into your hands and into your face and 9 everything. 10 So, they were worried about getting my 11 finger cleaned. So they tried doing that at 12 Malcolm's. And Kipper said, no, we've got to get 13 to the emergency room, and we've got to get hold 14 of the tip of his finger. So we went to the 15 emergency room, the doctor asked me what happened, 16 and I lied to him. I said that I had smashed it 17 in these large, accordion doors, that it had got 18 caught in the accordion doors. 19 Q Why would you lie about that? 20 A I lied because I did not -- I didn't 21 feel -- I didn't want to disclose that it was what 22 it was. I didn't want to disclose that it had
1770	1 very high frequency, and I was in a bit of shock, 2 you know. I was in shock. 3 Q You mentioned that you reached out to 4 Dr. Kipper. Did you receive medical attention 5 after that? 6 A Yes. Jerry Judge, Malcolm Connolly, I 7 believe Debbie Lloyd was there. Yes, Debbie Lloyd 8 was there. Ben King had arrived as well. 9 Q Who is Ben King? 10 A Ben King was -- he's essentially -- 11 he's a house -- sort of an estate manager. We 12 worked together in London a few times, and he's a 13 wonderful guy, so I brought Ben along to Australia 14 to manage everything. He's very -- he's very, 15 very good and very nice. 16 And then, there was also -- yeah, I 17 mentioned Malcolm and Jerry. Yeah, they were 18 there as well. 19 Q Which, if any, of the medical 20 professionals that you saw that day did you tell 21 what happened to your finger? 22 A When Malcolm and Dr. Kipper -- when	1772	1 been -- I didn't want to disclose that it had been 2 Ms. Heard that had thrown the -- thrown a vodka 3 bottle at my -- at me and then took my finger off. 4 I didn't want to get her in trouble. I didn't 5 want to -- I tried to just keep things as 6 copasetic and as easy as possible for everyone. I 7 did not want to put her name in that mix. 8 Q Did you tell Dr. Kipper what had 9 actually happened to your finger? 10 A Yes. 11 Q After you returned from the hospital, 12 where did you go? 13 A I went to Malcolm Connolly's apartment 14 and slept on his couch. 15 Q And to the extent that you know, where 16 was Ms. Heard during this time? 17 A Ms. Heard was -- I wasn't there, but I 18 had -- it was clear that she had to -- she needed 19 to leave. And I'd asked them to get her on a 20 flight from Melbourne or Sydney, or wherever, back 21 to Los Angeles. 22 Q Why did you ask for that?

1773	<p>1 <b>A I didn't want to see her. I didn't</b> 2 <b>want to see her. I didn't want to have any more</b> 3 <b>arguments. I was – for all intents and purposes,</b> 4 <b>I was just done.</b> 5 Q Mr. Depp, I would like to show you a 6 picture. 7 MS. MEYERS: If we can, please, pull up 8 Plaintiff's Exhibit 145. 9 <b>A Nice.</b> 10 Q Mr. Depp, what is this a picture of? 11 <b>A That's me in the emergency room. I see</b> 12 <b>a detail that I forgot – I had forgotten, which</b> 13 <b>is the – Ms. Heard had pulled – taken my</b> 14 <b>cigarette from the ashtray and stomped it out in</b> 15 <b>my face here.</b> 16 Q Would you mark, on the screen, where 17 you see that. 18 <b>A It's right above that green dot.</b> 19 Q And do you know who took that, this 20 picture? 21 <b>A I do not know.</b> 22 MS. MEYERS: Can we, please, publish</p>	1775	<p>1 <b>A The remains of my finger.</b> 2 Q And was this taken shortly after you 3 were injured? 4 <b>A I believe this was taken at the</b> 5 <b>emergency room, I would imagine.</b> 6 MS. MEYERS: I'd move this into 7 evidence, but I would like to also warn the jury 8 and the people in the audience that this is a very 9 graphic picture. 10 THE COURT: All right. Any objection? 11 MR. ROTTENBORN: No, Your Honor. 12 THE COURT: All right. 144. 13 MS. MEYERS: We can take this down. 14 Thank you. 15 Q Mr. Depp, how long after your finger 16 was injured did you return to LA? 17 <b>A After the emergency room, the following</b> 18 <b>day, I was sent to a – they found a surgeon in</b> 19 <b>Australia so that I could go – they wanted me to</b> 20 <b>take – have X-rays taken and all that. So we</b> 21 <b>went to that doctor, the finger surgeon, and he</b> 22 <b>asked me what happened to my finger. And I,</b></p>
1774	<p>1 this to the jury? 2 THE COURT: Do you want to enter it 3 into evidence? 4 MS. MEYERS: Yes, please. 5 THE COURT: Any objection? 6 MR. ROTTENBORN: No, Your Honor. 7 THE COURT: All right. 145 into 8 evidence. You can publish it to the jury. 9 Q And so, Mr. Depp, now that the jury can 10 see the photograph, can you, again, explain what 11 that green dot is identifying? 12 <b>A Just above the green dot is a wound</b> 13 <b>from Ms. Heard taking my cigarette, and this is</b> 14 <b>after the finger had gone away, and she stubbed it</b> 15 <b>out in my face, on my cheek. So, that's the</b> 16 <b>result of that.</b> 17 MS. MEYERS: If we could, please, take 18 this down. 19 Q And I would like to show you, Mr. Depp, 20 Plaintiff's Exhibit 144. 21 <b>A Yep. That's –</b> 22 Q What is this a picture of, Mr. Depp?</p>	1776	<p>1 <b>again, lied and I stuck to the story that it was</b> 2 <b>smashed in an accordion, a large, accordion door.</b> 3 <b>And he looked at me as if I were lying. And the</b> 4 <b>next thing I heard was "sir, that is a wound of</b> 5 <b>velocity."</b> 6 MR. ROTTENBORN: Objection. Hearsay. 7 MS. MEYERS: Your Honor, this is a 8 communication in the context of medical treatment. 9 THE COURT: I'll sustain the objection. 10 Move on. 11 Q So, Mr. Depp, this was a surgeon you 12 saw in Australia? 13 <b>A Yes.</b> 14 Q When did you return to Los Angeles 15 after seeing that surgeon? 16 <b>A I believe it was probably the next day,</b> 17 <b>where it might have been Kipper or someone who had</b> 18 <b>hooked me up with a wonderful surgeon, a great</b> 19 <b>expert in reconstruction of, you know, hands,</b> 20 <b>fingers, digits, whatever. So I went to see the</b> 21 <b>surgeon and we prepped for surgery, you know,</b> 22 <b>pretty quickly.</b></p>

<p>1777</p> <p>1 Q And what type of surgery did you have 2 on your finger? 3 A The majority of this was all missing 4 and, essentially, to some degree, hollowed out, if 5 you will, because the bone had shattered and then 6 there was the bone that was sticking out down 7 there. 8 So he had to take -- do a skin graft 9 from this part of my hand and graft it onto my 10 finger to give me a finger again. 11 Q Anything else that was done to your 12 finger to stabilize it? 13 A I don't think it was initially that 14 they put the pin in. I think the pin -- feels 15 like the pin came later. I'm not sure. But he 16 had just -- I had to go -- after the surgery, it 17 was bandaged up, and, you know, they give you all 18 kinds of things on what to do, what not to do, 19 keep it elevated, things like that. I just walked 20 away with a very large middle finger. It was all 21 wrapped up to, like, this (indicating) and then, 22 you know, medicated. They gave me shots in there</p>	<p>1779</p> <p>1 MS. MEYERS: If we could, please, pull 2 up Plaintiff's Exhibit 61. And if we could scroll 3 to the second picture, or in this report. Can you 4 keep going one more, please. Another. Sorry. 5 This is a series of pictures. And to spare 6 everyone, I don't think I'll show you the 7 immediate injury again. 8 This is the right one. Right here. 9 Thank you. 10 Q Mr. Depp, do you recognize this 11 picture? 12 A Yes, I do. 13 Q And what's reflected in this picture? 14 A This was taken in the surgeon's office 15 where I'd go in -- well, I had to go in every 16 couple or few days to have it checked out for 17 infections and such. And this -- so the finger, 18 finger/non-finger, was wrapped quite heavily and 19 there was this medicated kind of greasy, medicated 20 thing on top of the wound itself. And this, I 21 believe, seems like when the pin was in here, and 22 the wrapping is -- the bandage is -- well, I had</p>
<p>1778</p> <p>1 and such. 2 Q How long did you wear that bandage that 3 you just described? 4 A Well, the bandage was from the time of 5 the surgery all the way through the remainder of 6 finishing Pirates of the Caribbean, which was, I 7 think I finished -- the injury took place in 8 March. Finished Pirates of the Caribbean 5, I 9 believe, in August, beginning of August, end of 10 July. 11 Q And you -- 12 A So, there was a bandage on it the whole 13 time. What I had to do was wear -- you know, 14 there's a special effects trick that they had 15 planned. Basically, whatever bandage I had on, as 16 long as they could, they would put little green 17 dots, for example, on the splint and the finger 18 and all that, and the bandages, so that in 19 postproduction, they could use what's called 20 computer-generated imagery, CGI, to erase the 21 bandage and put a -- replace it with a normal 22 finger. That's how we finished the film.</p>	<p>1780</p> <p>1 my choice, you know, and I thought, well, might as 2 well take the kiddie bandages, you know, dinosaurs 3 and hearts and unicorns, as I said, you know, at 4 least have some humor to deflect the pain. 5 MS. MEYERS: Your Honor, I would like 6 to move Plaintiff's Exhibit 61 into evidence. 7 THE COURT: Do you want the whole 8 exhibit or just the picture? 9 MS. MEYERS: If we could publish the 10 whole exhibit. 11 THE COURT: You want the whole exhibit 12 in. 13 Any objection to 61? 14 MR. ROTTENBORN: No, Your Honor. 15 THE COURT: You just want to publish 16 this part of 61? 17 MS. MEYERS: Yes. 18 Q So how long after this injury was this 19 picture taken? 20 A After the initial injury? 21 Q Yes. 22 A I would say no more than -- seems to me</p>

1781	<p>1 no more than five days, a week.</p> <p>2 Q And how long was this bandage on your</p> <p>3 hand for?</p> <p>4 A I was wearing bandages all the way up</p> <p>5 until I finished the film and then -- yeah,</p> <p>6 through -- up through August, for sure, and then</p> <p>7 beyond. I had to keep it -- I had to keep it</p> <p>8 covered. I had to keep it protected.</p> <p>9 Q Do you recall how long after the injury</p> <p>10 that the -- excuse me, how long after the surgery</p> <p>11 the pins were removed from your finger?</p> <p>12 A I would say maybe -- I think it was</p> <p>13 about two or three days, because I remember that</p> <p>14 there was -- maybe more. But I just remember that</p> <p>15 the pain seemed to be getting worse and worse, and</p> <p>16 Debbie would rate it. Is this a 8 out of 10, is</p> <p>17 this a 3 out of 10? That kind of thing.</p> <p>18 At a certain point, it became kind of a</p> <p>19 12 out of 10 because it felt hot, very, very hot,</p> <p>20 and it felt -- there was throbbing, it was like</p> <p>21 there was throbbing, and the pin in there, it was</p> <p>22 like I could feel the pin in it. So I -- we</p>	1783	<p>1 go ahead and take our hour lunch break. Come back</p> <p>2 at 2:00. Make sure you do not discuss the case</p> <p>3 and do not do any outside research, and we'll see</p> <p>4 you at 2.</p> <p>5 (Whereupon, the jury exited the</p> <p>6 courtroom and the following proceedings took</p> <p>7 place.)</p> <p>8 THE COURT: And, again, sir, since</p> <p>9 you're still testifying, you cannot discuss your</p> <p>10 testimony with your attorneys or anybody else,</p> <p>11 okay?</p> <p>12 See everybody at 2.</p> <p>13 MR. CHEW: Thank you, Your Honor.</p> <p>14 MR. ROTTENBORN: Thank you, Your Honor.</p> <p>15 THE BAILIFF: All rise.</p> <p>16 (Recess taken from 12:55 p.m. to</p> <p>17 2:00 p.m.)</p> <p>18 THE BAILIFF: All rise. Please be</p> <p>19 seated and come to order.</p> <p>20 THE COURT: All right. Are we ready</p> <p>21 for the jury?</p> <p>22 MR. CHEW: Yes, Your Honor.</p>
1782	<p>1 called the surgeon, I called the surgeon, told</p> <p>2 him -- or, actually, I think it might have been</p> <p>3 Debbie Lloyd, actually, that called. I knew I had</p> <p>4 to see the surgeon again because something felt</p> <p>5 very wrong. And I went there and he removed all</p> <p>6 the bandages and he found that my finger was,</p> <p>7 indeed, infected and that I had contracted MRSA,</p> <p>8 MRSA, which is, like, I believe like the</p> <p>9 flesh-eating disease or something. But it was a</p> <p>10 pretty -- it was a pretty grotesque sight after</p> <p>11 that, with the pin and what they had to do to save</p> <p>12 it.</p> <p>13 Q Mr. Depp, while your finger was injured</p> <p>14 and healing, did you ever take any opiates during</p> <p>15 that time?</p> <p>16 A No, ma'am. No, no, no. No more.</p> <p>17 MS. MEYERS: Your Honor, I'm about to</p> <p>18 switch gears.</p> <p>19 THE COURT: All right.</p> <p>20 MS. MEYERS: So it makes sense to take</p> <p>21 our lunch break.</p> <p>22 THE COURT: Ladies and gentlemen, let's</p>	1784	<p>1 THE COURT: All right.</p> <p>2 (Whereupon, the jury entered the</p> <p>3 courtroom and the following proceedings took</p> <p>4 place.)</p> <p>5 THE COURT: All right. Thank you. Be</p> <p>6 seated.</p> <p>7 All right, your next question.</p> <p>8 MS. MEYERS: Thank you.</p> <p>9 BY MS. MEYERS:</p> <p>10 Q Mr. Depp, I'd like to show you a</p> <p>11 document that's been marked as Plaintiff's</p> <p>12 Exhibit 146.</p> <p>13 MS. MEYERS: And I believe this was</p> <p>14 entered into evidence previously. So if we could,</p> <p>15 publish it to the jury as well, please.</p> <p>16 Q Mr. Depp, could you please explain to</p> <p>17 the jury what's reflected in this photograph?</p> <p>18 A I believe that's -- well, it's</p> <p>19 definitely me after receiving kind of a roundhouse</p> <p>20 punch from Ms. Heard.</p> <p>21 I believe that this is -- that's March.</p> <p>22 I believe that this is from what's been called the</p>



<p>1785</p> <p>1 "staircase incident." 2 Am I correct? 3 Q You said you think this is from March 4 of 2015? 5 A I'm just looking at the top. 6 Q Do you remember who took this 7 photograph? 8 A Mr. Bett, Sean Bett. 9 Q And relative to when you had injured 10 your finger, when was this photograph taken? 11 A Sorry? 12 Q Relative to when you had injured your 13 finger in Australia, when was this photograph 14 taken? 15 A The injury to my finger was sustained, 16 I believe it was a couple of weeks or so before 17 this. Because I was -- we were back in 18 Los Angeles for the surgery, rehabilitation of the 19 digit. 20 Q So I know you can't see your hand in 21 this photograph, but what was -- what would your 22 hand have been like, given its injury, at this</p>	<p>1787</p> <p>1 rather -- and the reason for that was because of 2 the infection, MRSA, had already been working its 3 way for a number of days. 4 Q Mr. Depp, could you please explain to 5 the jury the circumstances that led to you having 6 the bruise that's reflected in this photograph? 7 A Again, there was another confrontation, 8 another confrontation, another argument about 9 something or other, and we were -- we were in 10 penthouse 5 area, which was where Ms. Heard had 11 her office at the top of the stairs. And so the 12 stairs came down and then there was a landing, and 13 then another set of stairs went down the opposite 14 direction. 15 And this took place on the landing, 16 where she was coming at me and trying to -- well, 17 trying to get to me, trying to hit me, trying to 18 do anything she could. And then Whitney, her 19 sister, was there who stepped in the way. And it 20 was interesting, now, is that Whitney stepped in 21 front of Amber and was facing Amber to stop Amber, 22 and when she was in between us, Amber snuck in</p>
<p>1786</p> <p>1 date? 2 A Well, it was still a very fresh wound. 3 When that amount of -- when the tip of your -- 4 when your finger is severed, that's not going to 5 heal up for a very long time. And so my finger 6 was still -- it was still a very fresh wound. 7 I'm not sure, but I'm pretty sure that 8 this might have been around the time of the pin, 9 the pin that was put into my finger to keep it 10 together, I guess. 11 Q And what type of cast would you have 12 had on at this time? 13 A It wasn't a cast, per se; it was 14 bandaging. When the bandage was out to sort of 15 here (indicating), that was extra padding for the 16 tip-of-the-finger protection and, also, because of 17 the pin that was in there. And so, as I had said 18 before, there were -- when Nurse Debbie would ask, 19 you know, "Give me, you know, on a scale of 1 to 20 10 your pain," when the finger started to feel 21 differently and hurt a lot more and became like a 22 12 out of 10 pain, that was -- yes, that was</p>	<p>1788</p> <p>1 the -- she reached, got the roundhouse in, and 2 just nailed me on the cheekbone. 3 Q Do you recall what Ms. Heard was upset 4 about at this time? 5 A I do not. I really don't. 6 Q And was anyone else in the -- in 7 penthouse 5 with you and Whitney and Ms. Heard? 8 A By that time, Mr. McGivern had been 9 called. I believe that -- actually, Debbie, as I 10 remember, Debbie Lloyd was at the front door of 11 penthouse 5, standing by the door. Mr. McGivern 12 was kind of at the bottom of the last group of 13 stairs, and then the thump happened and I got 14 myself out of there, out of the situation, and I 15 walked down the stairs to Mr. McGivern just to 16 say, "Let's get out of here," you know. 17 And I remember that something was 18 thrown from up there. I don't recall what it was, 19 but something was thrown at me. Seemed like it 20 was like a -- I don't know if it was a bag of, 21 like, pens or -- but it was from her office area. 22 MS. MEYERS: If we could, please pull</p>

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<p>1 up Plaintiff's Exhibit 343, and for the record, 2 this is an audio recording, and it's quite lengthy 3 so we intend to play certain portions of it. 4 THE COURT: Okay. 5 Any objection? 6 MR. ROTTENBORN: No objection other 7 than just like to know what minute, seconds, 8 portions they're going to play. 9 THE COURT: Okay. But the entire audio 10 is in evidence, correct? 11 MR. ROTTENBORN: Yes, Your Honor. 12 THE COURT: And no objection? 13 MS. BREDEHOFT: No. We've agreed to 14 that audio. 15 THE COURT: All right. 343 in 16 evidence. 17 MS. MEYERS: If you would like me to 18 read the specific minutes now, or we can provide 19 it to counsel after. 20 THE COURT: Do you want it now or as 21 you go? 22 MR. ROTTENBORN: I would prefer it now.</p>	<p>1 I'm telling you if you lost memory last 2 night of kicking me out the door with the fucker 3 hitting me -- 4 MS. HEARD: Again -- 5 MR. DEPP: -- and your memory is gone 6 from you kicking the bathroom door and hitting me 7 in the skull -- 8 MS. HEARD: Again -- 9 MR. DEPP: Wait. 10 MS. HEARD: -- am sorry. 11 MR. DEPP: If you have those memories 12 of the fucking, you know, did (indiscernible) -- 13 MS. HEARD: I said there was lots of 14 wine and I was on Ambien. 15 Why are you obsessing on something I 16 can't remember it the way you remembered it? I 17 said I was sorry. 18 MR. DEPP: I'm not talking about that. 19 What I... 20 (Whereupon, the following audio clip 21 was played.) 22 MR. DEPP: It's not an escape, it's not</p>
1790	1792
<p>1 Thank you. 2 THE COURT: Okay. 3 MS. MEYERS: We intend to play minute 4 25, 37 seconds through 26:28. 1 hour and 57 5 minutes, 21 seconds through 1 hour, 58 minutes, 54 6 seconds. 2 hours, 38 minutes, 52 seconds 7 through -- excuse me -- 2 hours, 38, 52 seconds 8 through 2 hours, 39 minutes, 43 seconds. And then 9 2 hours, 46 minutes, 1 second through 2 hours, 47 10 minutes, 20 seconds. 11 Those are the four clips. 12 THE COURT: Okay. 13 MS. MEYERS: Thank you. 14 THE COURT: Do you want to publish that 15 to the jury? It doesn't matter. It's just audio. 16 Doesn't matter. 17 (Whereupon, the following audio clip 18 was played.) 19 MR. DEPP: You know, as I get older, I 20 feel as though, you know, I want to say something 21 to you, that it was okay; that's the promise you 22 gave me a little while ago.</p>	<p>1 creating matters not to engage. It's just to get 2 out of a bad situation while it's happening before 3 it gets worse. 4 In Australia, I mean, that was a big 5 fight where I lost the tip of my finger. 6 At least five bathrooms and two 7 bedrooms I went up to, to -- to -- 8 MS. HEARD: To avoid talking to me. 9 And where are you now? 10 MR. DEPP: To escape the fight. 11 MS. HEARD: You don't escape the fight, 12 you escape the solution. 13 MR. DEPP: No. 14 MS. HEARD: You escape the solution. 15 MR. DEPP: No. 16 MS. HEARD: Escape? Figure it out. We 17 cannot work it out if you run away to the bathroom 18 every time. 19 MR. DEPP: Listen to me. Listen to me. 20 A boxer can't go 12 rounds without a fucking 21 minute break. 22 MS. HEARD: I am not giving you a</p>

Transcript of Jury Trial - Day 7  
Conducted on April 20, 2022

26 (1793 to  
1796)

1793	1 minute break. You do it at minute three at the 2 beginning of the argument. 3 MR. DEPP: I know. But there are 4 rounds, ma'am. And when it gets too fucking 5 hairy, the rest isn't a part of whether. But 6 I'm -- all I'm saying is you can't have a solution 7 if the argument just keeps mounting and mounting 8 and mounting and mounting. 9 I fucking go into the bathroom and sit 10 on the floor. Bam, bam, bam. Here you come. I 11 come out. Fight, fight, fight. Crazy. 12 Escalated. 13 I go screw it again. I go to another 14 fucking bathroom or bedroom or something. Knock, 15 knock, knock. Bang, bang, bang. You kept coming 16 to get me. 17 (Whereupon, the following audio as was 18 played.) 19 MR. DEPP: I'm not the one who fucking 20 throws things. Fucking pots and -- 21 MS. HEARD: That's different. 22 MR. DEPP: -- and anything else at me.	1795	1 to think that there's this cowardism in me that 2 runs away and I don't fight for you. 3 MS. HEARD: And you're justifying that 4 by saying I throw pots and pans? Okay, cool. 5 That's not why I'm hitting you. 6 MR. DEPP: I'm not the one... 7 (Whereupon, the following audio was 8 played.) 9 MR. DEPP: I said no. I said no. I 10 said to you, "Hey, tell Travis what just 11 happened." 12 MS. HEARD: And you told me to do that. 13 You told me "Go do that." 14 MR. DEPP: I said, "No, tell him what 15 you said." 16 MS. HEARD: And I lied. 17 MR. DEPP: When you punched me in the 18 mouth with -- 19 MS. HEARD: You're right. 20 MR. DEPP: -- that thing. 21 MS. HEARD: You figured it all out. 22 MR. DEPP: And you said, "I don't
1794	1 MS. HEARD: That's different. That's 2 when one does not negate the other. That's 3 irrelevant. A complete non sequitur. Just 4 because I throw pots and pans does not mean that 5 you come and knock on the door. 6 MR. DEPP: (Indiscernible). 7 MS. HEARD: Just because I throw a 8 vapor does not mean that you come and knock on the 9 door. 10 MR. DEPP: So I should just let you 11 throw -- 12 MS. HEARD: I'm not saying that. 13 You're saying that. You're putting words in my 14 mouth and then making non sequiturs. 15 MR. DEPP: I'm getting to the 16 situation. 17 MS. HEARD: No. You are trying to 18 justify how you don't when you come to the door -- 19 MR. DEPP: No, I'm just -- 20 MS. HEARD: (Indiscernible due to cross 21 talking.) 22 MR. DEPP: I'm justifying how you seem	1796	1 fucking gotta do it. What the fuck are you 2 talking about?" And I wanted to see why. And 3 then -- 4 MS. HEARD: Hey, fuck you, by the way. 5 I'm sorry I didn't hit you across the 6 face in a proper slap, but I'm saying I'm not 7 punching you. 8 You're not punched. 9 MR. DEPP: Don't tell me what it feels 10 like to be punched in the head. 11 MS. HEARD: Now are you gonna lie about 12 it. Been a helluva long time. I know. 13 MR. DEPP: No. When you fucking have a 14 (indiscernible). 15 MS. HEARD: You didn't get punched. 16 You got hit. I'm sorry you got hit. But I did 17 not punch you. I did not fucking deck you. I 18 fucking was hitting you. 19 I don't know what the full motion of my 20 actual hand was. But you're fine. I did not hurt 21 you. I did not punch you. I'm hitting you. 22 MR. DEPP: Now you're talking.

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<p>1 MS. HEARD: What am I supposed to do, 2 do this? I'm not sitting here bitching about it, 3 am I? You are. 4 That's the difference between me and 5 you. You're a fucking baby. 6 MR. DEPP: Because you start -- 7 MS. HEARD: You are such a baby. Grow 8 the fuck up, Johnny. 9 MR. DEPP: Did you start physical 10 fights. 11 MS. HEARD: I did start physical 12 fights. 13 MR. DEPP: Yeah, you did. So I had to 14 get the fuck out of there. 15 MS. HEARD: Because -- yes, you did. 16 You did the right thing, the big thing. 17 You know what, you are admirable. 18 (Whereupon, the audio ended.) 19 MS. MEYERS: Mr. Depp, could you please 20 explain to the jury what they just heard on those 21 audio recordings? 22 <b>A What was just played on the audio</b></p>	<p>1797</p> <p>1 the door in case she tried to burst in, and I was 2 right; she did. She tried -- bathroom doors go 3 in. She was pushing her -- all of her weight on 4 the door trying to get in, and I was pushing back 5 because I didn't want to let her in because I 6 didn't obviously want the confrontation. She was 7 not in the best of moods, you can -- you can hear. 8 So when I was pushing the bathroom door 9 trying to close it and was almost closed, she 10 suddenly kind of yelped in pain, and she screamed 11 out, "Ow. My toes," or "my foot," or something. 12 So in that second I thought possibly her foot had 13 gotten caught under the door, which would, of 14 course, not feel great on the foot or the toe, so 15 I thought she was maybe injured. So I knelt down 16 to have a look. The door was still -- it was 17 still pretty well about that much open 18 (indicating). 19 And when I knelt down on my hands and 20 knees to look at her foot to see the injury, she 21 kicked the bathroom door into my head. So it -- 22 yeah, she kicked the bathroom door into my head,</p>
<p>1798</p> <p>1 recordings was very much the tone and the 2 aggression and the attitude and the need for a 3 fight from Ms. Heard. That was -- I don't know if 4 that was some need for attention, but I don't -- 5 that was the sound that I had gotten very used to, 6 the squabbling, you know, the raising of the voice 7 to essentially ex-communicate anything that I had 8 to say about the situation. 9 But, then, I do remember the -- that 10 incident. I believe that's from the -- when I 11 was -- that was in the bathroom and I was, in 12 fact, taking a shower, and this was in 13 penthouse 3, and she came banging on the door, 14 banging on the door. I didn't answer; I was in 15 shower. I couldn't deal with it. I didn't want 16 to deal with any more of that sarcastic, 17 demeaning, aggressive, violent, toxic spew. 18 And so I was taking a shower, and I 19 didn't want to answer the door. She kept banging. 20 And then I finally got out of the shower, and I 21 opened the bathroom door about just that much 22 (indicating), just so I could have a good hold on</p>	<p>1799</p> <p>1 and I was completely taken aback by such a 2 corrosive, horrific move. So I stood up and I 3 believe I -- I stood up, but by this -- this 4 point, the door was open. I stood up, and I said, 5 I think I said, "What the fuck was that? What the 6 fuck was that?" And the next move was just a 7 bang, and just she clocked me in the jaw, and that 8 was another shocker. 9 Q How long after that did you start 10 recording? 11 A Sorry? 12 Q How long after that did you start 13 recording that audio recording that we just heard? 14 A That audio recording was about her 15 trying to make less of what had happened, in fact, 16 trying to make less of what had happened by 17 repeating some story to me that didn't make any 18 sense, and it certainly didn't make any sense 19 since I was there and I was the target. 20 So I wanted some confirmation from 21 someone with some semblance of a mind that could 22 understand what was happening. I wanted</p>

<p>1801</p> <p>1 Mr. McGivern to come up, and I asked her to tell 2 him what had just happened. And her answer was 3 essentially, "I don't know what he's talking 4 about. Nothing happened. He's fine." 5 And once again, I had told 6 Mr. McGivern, "Time to leave the premises." 7 Q Mr. Depp, I'd like to show you, now, 8 what's been marked as Plaintiff's Exhibit 162. 9 A Okay. 10 MS. MEYERS: You can take those down. 11 Thank you. 12 Could you pull up Plaintiff's 92, 13 please. 14 Q Mr. Depp, what is this a picture of? 15 A That's a photograph of the blade of an 16 old, like, a bowie knife. That's the photograph 17 of the blade with an inscription on it to me from 18 Ms. Heard, who, at the time, I referred to as 19 "Slim." 20 MS. MEYERS: Your Honor, we'd like to 21 move Exhibit 90 -- Plaintiff's Exhibit 92, into 22 evidence.</p>	<p>1803</p> <p>1 MS. MEYERS: Plaintiff would move 2 Plaintiff's Exhibit 93 into evidence as well. 3 MR. ROTTENBORN: No objection. 4 THE COURT: All right. 93 into 5 evidence. You can publish to the jury. 6 Q Mr. Depp, do you recall the occasion on 7 which Ms. Heard gave you this knife? 8 A I don't recall exactly the occasion, 9 whether it was my birthday of 2015 or if it was a 10 Christmas gift. 11 MS. MEYERS: We can take this down, 12 please, thank you. 13 Q Mr. Depp, I'd now like to show you 14 what's been marked as Plaintiff's Exhibit 65. 15 MS. MEYERS: And I believe this has 16 already been offered into evidence. 17 THE COURT: Yes. 18 MS. MEYERS: So if we could, please 19 publish to the jury. Thank you. 20 Q Mr. Depp, what's reflected in these 21 photographs? 22 A There were some scratches, another</p>
<p>1802</p> <p>1 THE COURT: Any objection? 2 MR. ROTTENBORN: No objection. 3 THE COURT: 92 admitted. 4 Q Mr. Depp, what does it say on this 5 knife? 6 A "Hasta la muerte." 7 Q What does that mean? 8 A Until death. 9 Q And then what does it say after that? 10 A "XX Slim." 11 Q And who is Slim? 12 A Ms. Heard. 13 Q When did Ms. Heard give you this knife? 14 A Well, it was a present from Ms. Heard. 15 I believe it was around 2015. 16 MS. MEYERS: Could we please take this 17 down and pull up Plaintiff's Exhibit 93. 18 THE COURT: 93? 19 MS. MEYERS: 93, yes. 20 Q Mr. Depp, what is this a photograph of? 21 A That's the knife in full view. That's 22 the full side of that knife.</p>	<p>1804</p> <p>1 altercation, and there was some -- Ms. Heard had 2 come at me with her nails, her hand, scratching at 3 me. 4 Q And who took these photographs of you? 5 A Once again, I believe this was 6 Mr. Bett, Sean Bett. 7 Q And when were these photographs taken? 8 A Seems to be Christmas, or ten days 9 before Christmas, the 15th of December 2015. 10 Q Mr. Depp, do you remember what led to 11 you having these scratches on your face? 12 A This was, yet again, another 13 confrontation where -- as was my regular practice, 14 there had been an altercation. She had some rage 15 issue with me, and I remember that I was trying to 16 go to my corner, as it were, which is I went -- I 17 was going into my office in the -- in penthouse 3, 18 which was upstairs. And as I was approaching the 19 door to my office, Ms. Heard ran out of the master 20 bedroom, our bedroom, and started just throwing 21 wild punches at me, at the back of my head, and at 22 the side of my head, at my -- anything that she</p>

<p style="text-align: right;">1805</p> <p>1 could connect with. And I had to – I would have 2 to show you sort of the – how I tried to avoid 3 the attack – 4 Q Please do. 5 A – if it's all right, Your Honor. 6 THE COURT: Yes, sir. 7 A If I'm looking this way to the door of 8 my office and the bedroom door is where you are, I 9 walked across the mezzanine there, and as I'm 10 approaching the door, suddenly I'm just getting 11 clobbered from behind. And one's natural primal 12 instinct is to kind of duck and cover. So I 13 ducked and covered, but they didn't stop. 14 So I came up just like this 15 (indicating), sort of protecting my face, but at 16 the same time, with her arms swinging wildly, I 17 put my arms out, and I was able to get her into a, 18 like, a – what do you – a bear hug or something, 19 just to stop her from hitting me anymore. 20 And while holding her in that position, 21 she was still trying to, you know, she had her 22 legs; she could kick, you know, she could knee me.</p>	<p style="text-align: right;">1807</p> <p>1 impossible, she split. She huffed off. I let her 2 go. She huffed away and she was gone for about 3 seven or eight minutes. And then when she came 4 back, I was in -- then I was in the bedroom of 5 penthouse 3, our bedroom, and she came back about 6 seven or eight minutes later, and she had a 7 Kleenex, or a tissue, to her nose, and then she 8 pulled it away from her nose and she showed it to 9 me, and there was red. There was, indeed, like, 10 red color on the tissue. But me, I know there was 11 no connection to her nose. No part of my body 12 made connection to her nose or eyes or anything 13 like. 14 So she said -- she took it away and she 15 showed it to me. She said, "Way to go, Johnny. 16 You broke my nose. You broke my nose." 17 And I knew I hadn't, so I said -- and 18 you go in sort of placation mode, which is "Oh, my 19 God. Let me see. Are you okay? What happened? 20 Let me see." And she wouldn't let me see 21 anything. And so I just tried to calm the 22 situation as best I could, all the while I was</p>
<p style="text-align: right;">1806</p> <p>1 So she was still trying to, you know, kind of – 2 very angry, very animated. And – yeah. It was 3 unpleasant. 4 Q What happened at the end of that 5 situation? 6 A Because of the grabbing of the arms and 7 the holding them to her side so I didn't receive 8 any more blows – and she was still fighting – I 9 believe there was some kind of contact with our – 10 our heads, our foreheads, as would happen if 11 you're trying to calm someone like that. And then 12 that was when she accused me of headbutting her, 13 of giving her a headbutt and breaking her nose, 14 but there was no blood. There was no – I didn't 15 hit her nose. If there was anything at all, it 16 was a – it was a bump of – well, I'm trying to 17 restrain her; she's trying to get out of it. 18 There's going to be some contact here and there, 19 accidental contact, but not a headbutt. 20 Q How did you escape this altercation? 21 A After she made the remark about the 22 fact that I'd headbutted her, which was just</p>	<p style="text-align: right;">1808</p> <p>1 waiting for her to dispense with that Kleenex 2 because I didn't trust it. And so I waited and 3 went – she dropped it into the wastebasket in her 4 bathroom, or in our bathroom, and left the room, 5 went somewhere, downstairs I think; I don't know. 6 And then I pulled the Kleenex out of the trash 7 bin, and I inspected it pretty closely and 8 realized that it was nail polish; it was nail 9 varnish or polish. 10 Q Mr. Depp, shortly after December 15, 11 2015, where did you and Ms. Heard go for the 12 holidays? 13 A It was – it had been planned for a 14 while that we would be going to the island and we 15 would be going to the island with my – my kids, 16 Lily-Rose and Jack and Lily-Rose's boyfriend at 17 the time. And there's a friend of Amber's called 18 Alice Temperley, I believe her name was – is, and 19 her boyfriend, Greg Williams, who's a very 20 well-known photographer, both very nice people, 21 and their kids were going to – she told me they 22 were going to be coming to the island. And I</p>

1809	<p>1 thought okay, great. And, so, yeah, that's -- so 2 that's where we went for the holidays. 3 Q And what happened on the island in 4 December 2015? 5 A Many things. 6 Q Was there any violence by Ms. Heard 7 against you? 8 A Oh, yes. There were a couple of 9 incidents that were, again, just each time one of 10 these incidents would occur, it seemed to get 11 worse and worse; that is to say, as opposed to 12 fists or anything like that. I'd set up -- on the 13 back porch of the house, I'd set up an area with 14 an easel and oil paints and a can of mineral 15 spirits, linseed oil, brushes, everything so if 16 she wanted to paint. So I had set it up for her. 17 And, again, I remember sitting at the 18 table where most of the paintbrushes and the can 19 and all that stuff was, and an argument, again, 20 escalated, escalated, escalated, and she reached 21 down and grabbed the can of mineral spirits and 22 chucked it at my face. She threw it at my face,</p>	1811	<p>1 happened to be in that area and witnessed the 2 violence. 3 MR. ROTTENBORN: Objection. 4 THE COURT: I'll sustain as to -- 5 unless you can lay a foundation how he would know 6 that if it was not hearsay. 7 MS. MEYERS: Certainly. 8 Q Mr. Depp, how do you know that these 9 staff members witnessed part of this altercation? 10 A These people, they're staff on the 11 island, though I consider them family and very 12 dear to me. And I believe it is mutual. I have 13 known them a very long time. They were visibly -- 14 they were visibly shaken by what they'd witnessed. 15 MR. ROTTENBORN: Objection, Your Honor. 16 THE COURT: Again, if you can lay a 17 foundation if he saw them there or if this is 18 something they told him. 19 Q Mr. Depp, did you see these individuals 20 shortly after you had the altercation with 21 Ms. Heard? 22 THE COURT: No, that's not the</p>
1810	<p>1 and it struck me right at the bridge of the nose, 2 sort of the forehead/bridge of the nose area, and 3 it hurt. 4 Q Who else was around when this happened? 5 A Well, thankfully my children and 6 Lily-Rose's boyfriend were over towards the cafe. 7 At that point, I didn't know that anyone else 8 had -- was around or had witnessed anything. I 9 thought it was just Amber and I, but apparently 10 that there are four staff who work on the 11 island -- 12 MR. ROTTENBORN: Objection. Hearsay. 13 THE COURT: I don't think it's hearsay. 14 I don't think there's any statement yet. 15 You can go ahead and continue your 16 answer, sir. 17 THE WITNESS: Okay. 18 Q Sorry. The staff that work on your 19 island, Mr. Depp. 20 A Yeah. So there are, indeed, four staff 21 who work on the island and live there all year 22 round who take care of everything, and two of them</p>	1812	<p>1 proper -- did he see them? Were they actually 2 there? If he didn't, if it's something they told 3 him, then it's hearsay. 4 Q Mr. Depp, did you see any of these 5 staff members at the house when you and Ms. Heard 6 had that altercation? 7 A Once Ms. Heard had stormed off, I sort 8 of sat there dazed and confused for a few minutes, 9 and then I walked around the house and I saw Tara 10 and -- 11 MR. ROTTENBORN: Objection, Your Honor. 12 THE COURT: That's fine. All right. 13 I'll sustain the objection. We'll move on. 14 Q You mentioned Tara. Who's Tara? 15 A Tara's the manager of the island. 16 Q Mr. Depp, I'd like to discuss 17 April 2016 now. 18 When is Ms. Heard's birthday? 19 A 22nd of April. 20 Q And in 2016, how was Ms. Heard 21 celebrating her birthday? 22 A We'd set up a dinner for her which</p>

1813	<p>1 was -- she wanted her dinner with her -- with all 2 her friends, and Josh Drew, Rocky's boyfriend, who 3 was some sort of chef, told -- he asked her what 4 she would like for him to cook. That's hearsay, I 5 guess. 6 THE COURT: Go ahead. I'm not sure 7 it's offered for the truth of the matter asserted. 8 MR. ROTTENBORN: You've got it. 9 THE COURT: Okay. Then. 10 THE WITNESS: I'm learning. 11 A Let me put it a different way? 12 Mr. Drew, who was a chef, which I don't believe is 13 hearsay, Mr. Drew had made Mexican food, 14 Ms. Heard's favorite. 15 Is that better? 16 Q And what were you doing that day before 17 Ms. Heard's birthday celebration? 18 A I had been in a room for many, many 19 hours with a group of accountants, new 20 accountants, and they were going through, 21 essentially, the situation that I was in 22 financially, which was a real shock to me. I had</p>	1815	<p>1 and I apologized all over the place. 2 And so when I left and picked up 3 something at the house, which I believe was her 4 gift, on the way downtown, I received a text from 5 Ms. Heard asking me to bring -- asked if I could 6 bring some wine and some weed. And I texted back 7 "Sure." 8 And then by the time I got to -- 9 arrived to penthouse 5 for the party, I was about 10 an hour and 40 minutes late, maybe, something like 11 that. 12 Q Before you arrived, how many drinks had 13 you had? 14 A Oh, I think I'd had a glass of wine 15 with -- well, there was one bottle of wine that Ed 16 White had brought to the meeting that we, between 17 I don't know how many, five or six of us, we had 18 a -- we had a glass of wine. 19 Q Could you tell the jury who Ed White 20 is? 21 A Oh, yeah, sorry. Ed White was my, at 22 the time, he was my new business manager, and he</p>
1814	<p>1 no idea, and I know this sounds ridiculous, but I 2 prefer to think of the work as opposed to how much 3 I'm getting paid. So I had no idea how much money 4 I had made. I just didn't -- I just figured if I 5 was working, there was money, so everything would 6 be all right. And they informed me that I had 7 been -- well, quite an inordinate amount of, sum 8 of money had been -- was gone. It had 9 disappeared. And after having worked 30-something 10 years in the industry -- I'm sorry. I could hear 11 Ms. Bred- -- 12 THE COURT: No, you're fine. Go ahead. 13 THE WITNESS: Sorry. 14 A I was pretty shocked at where I was -- 15 to learn I was exactly financially. And it was a 16 very long meeting. And I knew, of course, that 17 Ms. Heard's birthday dinner was to start, I 18 believe, at 8:30, and I texted her a number of 19 times from the meeting saying, "This is probably 20 going to go long, and I think I might be a little 21 late. I'm sorry, but it's, you know, important 22 and I'm going to be a bit late for the dinner,"</p>	1816	<p>1 was quite a -- he was quite a professional, you 2 know, nearly forensic business manager. And he 3 had shown me things that -- from my former 4 business manager that were quite disturbing. 5 MR. ROTTENBORN: Objection, Your Honor. 6 THE COURT: Hearsay. 7 MS. MEYERS: I believe he said he 8 showed him. 9 A Yes. He assayed papers. Maybe they're 10 hearsay papers. I don't know. 11 MS. MEYERS: I believe he was being 12 shown financial documents. 13 THE COURT: All right. All right. 14 Okay. I'll sustain as to any hearsay that might 15 be incurred. 16 Next question. 17 Q Mr. Depp, when you arrived at the 18 party, how did Ms. Heard greet you, if at all? 19 A Very cold. 20 Q What did she say to you? 21 A Not much. Not much, except 22 occasionally she would tear herself from the</p>



<p style="text-align: right;">1817</p> <p>1 conversation that she was in just to lean towards 2 me. I was sitting to her right, and I would get a 3 quick earful of "I can't believe you've done this 4 to me on my birthday. I can't believe. I'm so 5 embarrassed," you know, which I found odd because 6 I'd kept her informed all day and the last text 7 that I received was a request for wine and 8 marijuana. So when I got there and received that 9 attitude, what could I do? 10       So I just made the best of it and 11 talked to her friends and -- because they were all 12 her friends except for, I believe, Nurse Erin, 13 Erin was there, I believe. 14       Q What's Erin's last name? 15       A Erin Boerum, Nurse Erin, the nurse 16 assigned to observe. So I just had conversations 17 with the various people there. 18       Her makeup artist, Mélanie Inglessis 19 was there with her fellow, and I remember speaking 20 French with them. And I didn't really eat, wasn't 21 feeling it. 22       Q Did you have any drinks once you</p>	<p style="text-align: right;">1819</p> <p>1 down. There was Mr. Drew, Ms. Pennington, 2 Whitney -- possibly Whitney. That was about it 3 that was sort of left there. 4       Q And what happened after the guests left 5 the party? 6       A She was free to commence with the usual 7 verbal barrage and I -- at that point, there was 8 so much in my head from the meeting, I thought it 9 was a bit much that Ms. Heard had, I'm sorry, it 10 seemed quite bratish; it seemed quite childish 11 that Ms. Heard was holding such a grudge for me 12 having been late to her 30th birthday party when 13 she knew very well, she was well informed, that I 14 was in an intense meeting that had a lot to do 15 with not just my life and my future, but my 16 children's, and I didn't know what was going to 17 happen to -- I didn't know what was going to 18 happen. I didn't know if houses were going to 19 start going away. 20       I didn't -- so, it felt -- I'm sure, of 21 course she felt something, but it felt unfair. It 22 felt small, comparatively, if your loved one or</p>
<p style="text-align: right;">1818</p> <p>1 arrived at the birthday party? 2       A Wine. 3       Q How many glasses? 4       A Maybe two. Because they were, like, 5 large, you know, the large sort of Bordeaux 6 glasses. So, yeah, maybe two glasses of wine by 7 the time it started to wind down. 8       Q How many drinks did you observe 9 Ms. Heard consume after you arrived at the party? 10       A I really couldn't say because I -- all 11 I saw was just -- she had -- she was drinking 12 wine. 13       Q And did it seem to you that she had 14 been drinking wine prior to your arrival? 15       A I was sure, since I was an hour and 40 16 minutes late, that Ms. Heard was well into the 17 wine before I got there, yes, certainly. 18       Q How did the party come to an end? 19       A It was kind of, you know, one person 20 would say, "Well, I better get out of here," and 21 then two more couples or two more people would 22 say, "Yeah, time to go." And then it just wound</p>	<p style="text-align: right;">1820</p> <p>1 your husband has had some pretty serious issues 2 brought before him. So once she engaged in her 3 normal kind of banter of trying to poke at me and 4 get me to react, I literally just got into -- I 5 got into bed, and I remember the television was on 6 and I was reading. And I said -- of course, 7 Ms. Heard was down in her area, taking off her 8 makeup and changing into sleep clothes, whatever, 9 and she entered the bedroom where I was laying on 10 my side of the bed, reading, and she was still 11 rattling off all of the wrongs I done to her on 12 that particular day and how unreliable I am and 13 what a, you know, what a horrible person I was. 14       And I did not, I did not engage 15 verbally, nothing. I sat there -- or laid there, 16 reading my book. And when that -- when she didn't 17 get a jump out of me or a jolt out of me, she got 18 out of bed, she walked around the bed, she came to 19 my side, and, again, you know, you've got a person 20 who is throwing multiple shots at your face, at 21 your head, at your neck, at your -- at anything 22 she could hit.</p>

1821	1 So I got up out of bed, and I grabbed 2 her by the shoulders and I sat her down on the bed 3 and I said, "I'm leaving. Please don't get off 4 the bed. Please don't follow me. Please don't 5 try and stop me. I'm leaving." 6 And she got up off the bed, and she 7 squared off at me in the doorway of our bedroom. 8 And I said, "What are you going to do? Hit me 9 again? Would you like to hit me again?" And I 10 said, "Go ahead, hit me." Bam. 11 And I just said, "Is that what you 12 wanted? Would you like another?" Bam, there's 13 the second one. 14 And I said "Good. Now you're done," 15 grabbed her by the shoulders, walked her to the 16 bed, sat her down, and said, "Don't follow me. 17 Leave me alone. I'm out. I'm gone." 18 I went, I grabbed a few things, and I 19 got out immediately and I went to my other house 20 on Sweetzer. As Ms. Heard was -- she was leaving 21 the following day for Coachella -- Coachella is, 22 like, a big event, a concert, you know, many, many	1823	1 things that are important to me. 2 And he said, "I don't think now is a 3 good time to go." And I thought it's the perfect 4 time. She's not going to be home for two days. 5 And then he showed me a photograph on his 6 telephone of -- 7 MR. ROTTENBORN: Objection, Your Honor. 8 Calls for hearsay. 9 MS. MEYERS: It's a photograph, Your 10 Honor. 11 MR. ROTTENBORN: As being relayed to 12 him by Mr. Bett. 13 MS. MEYERS: He says he looked at it on 14 his phone. 15 THE COURT: I'll overrule on the 16 objection as to the photograph. 17 Q What was the photograph of, Mr. Depp? 18 A It was a photograph of the bed, our 19 bed, and on my side of the bed was human fecal 20 matter. So I understood why it wasn't a good time 21 to go down there. 22 My initial response to that was -- I
1822	1 bands and, yeah, out in the desert. She and her 2 friend were going to Coachella for the weekend, 3 and that was it. That was it. 4 Q Mr. Depp, after April 21st, 2016, when 5 was the next time that you actually saw Ms. Heard 6 in person? 7 A I left Ms. Heard -- well, I left 8 penthouse 3, I left at 4:30 in the morning on, it 9 was actually April -- it was actually her 10 birthday; it was about 4:30 in the morning, 11 April 22nd, and that's when I left. And from that 12 moment on, I did not see Ms. Heard until May 21st. 13 Q And why was that? 14 A I had received some news that was -- as 15 absurd and grotesque and cruel, I mean, I was 16 shown a picture of what the problem was. I had 17 gone to Mr. Bett and said, "She's at Coachella. I 18 think it's a good time to go downtown so that I 19 can get some of my things, you know, and get them 20 out of there," especially things that were 21 precious to me, you know, children things, things 22 from friends, Brando, Hunter, Thompson, whatever,	1824	1 mean, I laughed. It was so outside. It was so 2 bizarre and so grotesque that I could only laugh. 3 And so I did not go down there that day. 4 Q Mr. Depp, how was your mother's health 5 during this time? 6 A Not good. Not good at all. My mom was 7 in the Cedars-Sinai Hospital, and she was -- she 8 was on her way out. She was dying. 9 Q How often were you going to see her 10 during this time? 11 A Excuse me? 12 Q How often were you going to see her 13 during this time? 14 A As much as I could under the 15 circumstances. And when I did go and get to see 16 my mom, she was pretty much incapable of speech. 17 Her speech had left her. At that time, her -- she 18 seemed -- her eyes were still open and she was -- 19 she could kind of react with her eyes, but she 20 couldn't speak. And then not long after that, 21 once her eyes closed, she laid there for the 22 duration of her life, which ended on the 20th of

<p style="text-align: right;">1825</p> <p>1 May, the night before I saw Ms. Heard for the last 2 time -- well, essentially. 3 Q I'm so sorry, Mr. Depp. But how did 4 your mother's death affect you? 5 A As it would anyone, I suppose. There 6 was one thing that I couldn't fathom was, I mean, 7 I brought my kids to see Betty Sue in the 8 hospital, and at that time, she was not 9 functioning. She was not responsive. I mean, she 10 was alive, still, she was fighting still inside, 11 but she was lying in the bed and was -- excuse 12 this analogy, but all I could think of was how -- 13 if she's conscious of -- if she's conscious of 14 everything that's going on around her but has no 15 ability to speak, has no ability to move, I knew 16 that the one thing, as far as Betty Sue was 17 concerned, the last thing that she would have 18 wanted was to have ended up lying there on a -- it 19 was like there's my mom lying there on a deli 20 platter, and it was a horrible image. 21 But I brought my kids in to say 22 goodbye, and we all spoke into her ear and then</p>	<p style="text-align: right;">1827</p> <p>1 feels like a hundred years is in fact a second, 2 millisecond. Nobody can count those things. So I 3 am at peace with Betty Sue because I understood 4 where she came from and I understood how difficult 5 her childhood was and I understood that she had 6 not had the proper training or proper teaching or 7 the proper background to be anything other than 8 what she had been when we were younger. I forgave 9 her for all that, as one would, should. 10 So I was -- it opened my eyes to the 11 fact that, yes, try in relationships, whether 12 friendships, whether courtships, whether marriage, 13 whether this was -- try your best, try. If it's 14 not going to work, it's not going to work. 15 And, more importantly, if you're going 16 to get out -- if you're going to make an end, 17 which I had decided that it was -- somebody had to 18 call it, and I had decided that I would call Amber 19 and tell her that my mom had died that day, and 20 then I very calmly said, "Look, I've made a 21 decision, and I think it's the best thing. I'm 22 going to file for divorce, but I'm not going to</p>
<p style="text-align: right;">1826</p> <p>1 she passed away later. So, it was -- it was 2 painful, but there was some side of it, too, at 3 least to me, that in a way it was -- I was happy 4 for her. 5 Q Why was that? 6 A Because I can't imagine Betty Sue, or 7 my mom, I can't imagine anyone lying there in what 8 quite probably, quite possibly, was kind of a 9 locked-in syndrome. And if she's surrounded by 10 ten people looking at her lying there on that deli 11 platter, if you will, I was happy for her that she 12 was out of pain, out of frustration, out of -- I 13 was happy that she moved -- not happy -- I was 14 relieved that she was no longer in that situation. 15 Though, when those you love leave, we're the ones 16 stuck with the pain, with the grieving. But I was 17 glad that my kids got to see her and give her her 18 sendoff, I suppose, and -- but it was -- it opened 19 my eyes quite a lot to a number of things. 20 Q What were some of those things that 21 your mother's death opened your eyes to? 22 A That life is a birdsong, that what</p>	<p style="text-align: right;">1828</p> <p>1 cite irreconcilable differences. I'm not going to 2 cite any violence. I'm going to state this: We 3 simply, the two of us, we simply don't want to 4 feel as though we have a collar around each 5 other's neck and a leash attached to it and then 6 this piece of paper that proves that that's true." 7 So what I thought was best was we 8 wanted to end this in love and take the idea of 9 ownership, ownership of one another, out of the 10 picture. And that's how I approached Ms. Heard 11 with that. And... 12 Q So why did you go over to the 13 penthouses on May 21st, 2016? 14 A Ms. Heard had requested that I come 15 over to have a talk, to explain. She wanted to 16 explain things, and so I went there. And then I 17 also had to -- wanted to gather up some of those 18 things, you know, precious things that you live 19 with. Yeah, so I went over there to have a 20 discussion, what I felt would be a calm 21 understanding. 22 I thought I had figured she understood</p>

<p>1829</p> <p>1 as well as I did that there was no way back. And 2 I also felt that she would understand that it was 3 the best thing for both of us and that there was 4 nothing to -- shouldn't be anything to fight over; 5 it was clear. I told her that I would take care 6 of her and all that. And then she started to -- 7 she was telling me about the -- she brought up the 8 situation of the fecal matter on the bed, and I -- 9 and she tried to blame it on the dogs. 10 Q Why didn't you think it could have been 11 the dogs? 12 A The dogs weigh -- they're teacup 13 Yorkies, they weight about 4 pounds each. The 14 photograph that I saw, I mean, I lived with those 15 dogs for many years, and so did Hilda Vargas, 16 my -- she's a woman who's been with me for 30-plus 17 years, you know, from the very beginning, and she 18 was the one who photographed it. It was clear. 19 She knew the dogs as well as I did; that was 20 not -- none of -- that did not come from a dog. 21 It just didn't. 22 Q Mr. Depp, could we back up a little</p>	<p>1831</p> <p>1 the door to get in there in case anything went 2 down. 3 Q So when you walked into the penthouse, 4 what did you see? 5 A When I first walked into the 6 penthouses, you walk in and then make a left, and 7 then you're in the kitchen area. And then beyond 8 that was the living room. I saw Ms. Heard sitting 9 there on the couch. And I went over to talk -- I 10 went and sat down on the couch. She was sitting 11 on -- the couch was kind of a, you know, a square, 12 or a half square, you know. She was sitting on 13 one side of the couch; I was sitting on the other. 14 That's when she was trying to explain a 15 few things about Coachella and then the fecal 16 delivery and saying that it was the dogs. And I 17 said I'm sorry, I could not agree with her. I had 18 lived with those dogs. I picked up their fun, and 19 it was not the dogs. And so what happened was I 20 called -- I said, "Let's call Kevin Murphy." 21 Q Who's Kevin Murphy? 22 A Kevin Murphy had been -- in</p>
<p>1830</p> <p>1 bit? Who went over to the penthouses with you on 2 May 21st? 3 A I went to the penthouses with Jerry 4 Judge and Sean Bett. And I had asked them on the 5 just-in-case, "Please pay particular attention and 6 stay as close to the door -- you know, stay at the 7 door, or if you've got to split, come back quick," 8 you know, if they went down to the security shack 9 or whatever it was. "Don't linger. Get back. 10 Because if you hear anything, if you hear 11 screaming, you've got to get in there. So leave 12 the door unlocked and spring in there if you hear 13 something." 14 Q Why did you want them to be able to get 15 into the penthouse quickly if they heard anything? 16 A Just based on my past experiences with 17 Ms. Heard, when you say something that she either 18 didn't agree with or swore up and down that it was 19 a complete falsity and there's something wrong 20 with me, I'm crazy, and, you know, the escalation. 21 If anything was going to start to escalate, I did 22 not want to be there. So I had them waiting by</p>	<p>1832</p> <p>1 Los Angeles, he was the house manager over the 2 places in West Hollywood, and he was also taking 3 care of the penthouses downtown if any work needed 4 to be done or this or that. And he would schedule 5 the girls who would come in, the ladies like 6 Hilda, to do their work. And he'd had a 7 conversation with Ms. Heard. 8 MR. ROTTENBORN: Hearsay, Your Honor. 9 THE COURT: All right. Let's move on. 10 Q Let's move beyond the conversation that 11 Kevin Murphy had with Ms. Heard. 12 A Sure. 13 Q So after you called Kevin Murphy, what 14 happened? 15 A I asked Kevin if Amber and he had 16 spoken about the incident. He said, yes, they 17 had. Okay. 18 And it appears that Ms. Heard had 19 told -- 20 MR. ROTTENBORN: Hearsay, Your Honor. 21 THE COURT: I'm not sure. 22 MS. MEYERS: It's apparently a</p>

<p style="text-align: right;">1833</p> <p>1 statement by Ms. Heard. 2 MR. ROTTENBORN: That he heard from 3 Kevin Murphy. That's what the testimony is. 4 THE COURT: All right. If you want to 5 reframe that, that's fine. 6 MS. MEYERS: Okay. 7 Q After you hung -- when did you hang up 8 the phone with Kevin Murphy? 9 A Right about the time that Ms. Heard was 10 screaming obscenities at him and calling him a 11 liar and that he was a scumbag, I told her, I 12 said, "Listen, don't speak to this man that way. 13 Do not disrespect this man in that way." And then 14 Kevin Murphy just hung up. 15 And so at that point, she was riled, of 16 course, and I went upstairs to gather belongings. 17 When I came back downstairs, she was on the phone 18 with iO Tillett Wright, and they were making a 19 wonderful point of just how funny it was that I 20 felt that some human being had actually dropped a 21 grumpy -- pardon the term -- onto the bed, and 22 they were yakking it up, they were yukking it up.</p>	<p style="text-align: right;">1835</p> <p>1 screaming in her best freaked-out, upset voice, 2 high pitched, "Stop hitting me. Stop hitting me." 3 Jerry Judge and Sean Bett entered the 4 room, and as they entered the room, and she was 5 quite surprised to see them, she said, "That's the 6 last time you'll ever hit me. That's the last 7 time you'll ever do that to me." And, again, I'm 8 a good 20 feet away by the fridge. 9 And then Jerry said, "Boss, I just 10 think we should just leave." And then we left. 11 That was the last time I saw Ms. Heard until she 12 asked me to break the restraining order -- not 13 break the restraining order -- yeah, break the 14 restraining order and talk to her in July, later. 15 Q Mr. Depp, where did you go after you 16 left the penthouses on May 21st? 17 A I went home. 18 Q To which home? 19 A Oh, to Sweetzer. 20 Q And then where did you go -- where did 21 you go after you went home to Sweetzer? 22 A I was due to -- I had to go to -- I had</p>
<p style="text-align: right;">1834</p> <p>1 They were laughing about the whole thing. It was 2 a rough couple of days, and I really didn't feel 3 like I deserved that kind of treatment. 4 And I went over and I said, "Hey, let 5 me talk to him." I grabbed the phone and I said 6 to iO, "You can have her now. She's yours. She's 7 all yours," right? And then I took the phone, and 8 I just, bang, like that onto the -- I mean that 9 side of the couch was 8 feet long. The other side 10 of the couch is about 6 feet long. I flopped it 11 onto the couch, and I was walking towards the 12 kitchen to exit, and then suddenly, Rocky 13 Pennington ran into the penthouse and started, you 14 know, "Leave her alone, Johnny. Leave her alone." 15 I was by the refrigerator at this point. I was 16 20 feet away. 17 Q Where was Ms. Heard at this time? 18 A She was still sitting on the couch. 19 And that's when the screaming, you know, the 20 screaming started with, like, again, I'm 20 feet 21 away, she's still got iO on the phone. She's got 22 Rocky there. "Stop hitting me, Johnny," she's</p>	<p style="text-align: right;">1836</p> <p>1 to catch a flight to New York, where we were 2 doing -- I was -- this group, the Hollywood 3 Vampires, we were about to set out on a two- or 4 three-month tour of Europe, and we were rehearsing 5 in New York. And then we played one show in New 6 York as a warm-up gig, and then we were on the 7 plane and we were -- we started the shows in 8 Europe. 9 Q And -- 10 A I was on the road from then, which was 11 May, through July, August, or something. 12 THE COURT: Ms. Meyers, is this a good 13 time to take an afternoon break? 14 MS. MEYERS: I was just going to 15 suggest that. Thank you, Your Honor. 16 THE COURT: Okay. Good. All right. 17 Thank you. Let's go ahead and take our afternoon 18 break, ladies and gentlemen. Please do not do any 19 outside research, and do not discuss the case. 20 Thank you. 21 (Whereupon, the jury exited the 22 courtroom and the following proceedings took</p>

1837	1 place.) 2 THE COURT: All right. Take our 3 recess. Mr. Depp, you know what I'm going to say, 4 right? We've already had this discussion. 5 THE WITNESS: Yes, Your Honor. 6 THE COURT: Okay. 3:45. That sound 7 good? Thank you. 8 MR. CHEW: Thank you, Your Honor. 9 (Recess taken from 3:30 p.m. to 10 3:45 p.m.) 11 THE BAILIFF: All rise. 12 THE COURT: Just for your Exhibits 92 13 and 93, if I could get a hard copy of those, 14 they're not on the thumb drive for some reason, 15 and in my binders it says, "Produced in native 16 format," and I don't know what that means. So if 17 we could just get those two in hard copy, I'd 18 appreciate it. 19 MS. MEYERS: Absolutely. 20 THE COURT: All right. Are we ready 21 for the jury? 22 MS. MEYERS: Yes.	1839	1 MR. DEPP: Well, those wishes don't 2 come true. 3 MS. HEARD: Is there anything you want 4 to say to me, you fucking piece of shit. 5 (Indiscernible), fucking piece of shit. 6 (Indiscernible.) 7 MR. DEPP: I wish you the best. 8 MS. HEARD: Hey, buddy, fuck yourself. 9 Go suck your own dick. I'll write you a check for 10 the extra sip I took; is that okay? Stingy old 11 fucking piece of shit. 12 MR. DEPP: You're the one that brought 13 it up. 14 MS. HEARD: Uh-uh. You did. You said, 15 "Don't drink my wine. That's mine." 16 MR. DEPP: I didn't say that. 17 MS. HEARD: You did. 18 MR. DEPP: I said, "I didn't think you 19 were looking for any more." 20 MS. HEARD: What do you want? 21 MR. DEPP: Probably defending you 22 pretty good in front of your -- Rocky and your pop
1838	1 THE COURT: All right. 2 (Whereupon, the jury entered the 3 courtroom and the following proceedings took 4 place.) 5 THE COURT: All right. Thank you. All 6 right. Your next question, ma'am. 7 MS. MEYERS: Thank you. 8 BY MS. MEYERS: 9 Q Mr. Depp, I'd like to show you another 10 audio recording that is Plaintiff's Exhibit 397. 11 MS. MEYERS: And for the record, we 12 intend the play the portion that is 1 hour, 4 13 seconds to 1 hour, 2 minutes and 50 seconds. 14 THE COURT: All right. There's no 15 objection to 397 coming into evidence in its 16 entirety? 17 MS. BREDEHOFT: No objection. 18 THE COURT: Okay. All right. It's 19 coming in, 397 into evidence, and you want to play 20 that part. That's fine. 21 (Whereupon, the following audio clip 22 was played.)	1840	1 and your mom. 2 MS. HEARD: You're so pathetic. 3 MR. DEPP: You're -- 4 MS. HEARD: You're an old man. 5 MR. DEPP: I've tried so hard with you. 6 MS. HEARD: No way. 7 MR. DEPP: I tried so hard. 8 MS. HEARD: Man, you have 9 (indiscernible) fucking something you never know, 10 I hope to God, I hope to God Jack's stepfather 11 teaches him more about being a man than your 12 fucking (indiscernible). 13 MR. DEPP: Hey, that's good. You gave 14 me some shit about my kids, just like in London, 15 you desired. Never again. Stay away. You don't 16 exist. You will not be getting my words. 17 BY MS. MEYERS: 18 Q Mr. Depp, could you please describe to 19 the jury what they just heard in that audio 20 recording? 21 <b>A I don't know when, I don't know when</b> 22 <b>that -- if there's a date on that, but clearly</b>

1841	<p>1 there was some animosity and another clash, and 2 Ms. Heard, once again, felt it necessary to bring 3 my kids, my son, into the -- into that argument 4 and say that she hopes that my son's stepfather 5 can teach him how to be a man since I couldn't. 6 And I believe she said something about more man in 7 the stepfather than would be existing in my, I 8 believe the term was "left nut." 9 Q How often did Ms. Heard bring your 10 children into your arguments? 11 A Too often. 12 Q And at the end of your relationship, 13 how was Ms. Heard's relationship with your 14 children? 15 A Nonexistent. They, my children -- my 16 kids are far more intelligent than I am, and they 17 broke -- they wouldn't be around Ms. Heard. They 18 refused to be around her anymore. They didn't 19 like the way she treated me, which was written, a 20 very eloquent letter by my daughter, actually, to 21 Ms. Heard. I don't know if that's in evidence, 22 but I remember the -- my daughter sent a text to</p>	1843	<p>1 Q When did you learn that Ms. Heard had 2 made domestic abuse allegations against you? 3 A The 27th of May, which is, in fact, my 4 daughter's birthday, I saw that she had gone to a 5 court, I don't know, some court, and there were 6 paparazzi everywhere and her and a brown mark on 7 her face. And it also happened to be the day that 8 Charlie and -- no, Alice in Wonderland 2, Through 9 the Looking Glass was opening, and that's the day 10 that she chose to get the -- to go to the 11 courthouse and get a TRO, temporary restraining 12 order, against me. But I was in Europe already at 13 that point. 14 Q Mr. Depp, I'd like to show you what's 15 been marked as Plaintiff's Exhibit 487. 16 MS. MEYERS: And just for the record, 17 this is a very long document and we will be 18 showing pages 470 -- excuse me, 492 through 494. 19 THE COURT: There's no objection to the 20 document 487? 21 MR. ROTTENBORN: Your Honor, if I could 22 just have a minute or two to scroll through it.</p>
1842	<p>1 Ms. Heard. 2 MR. ROTTENBORN: Objection, Your Honor. 3 Just hearsay. One thing for the witness to tell 4 his story, another thing for him to tell other 5 people's story. 6 THE COURT: Okay. 7 MS. MEYERS: We'll move on. 8 THE WITNESS: I'm sorry, I read the 9 email. 10 THE COURT: Yeah, I understand. Next 11 question. 12 Q When did you learn that Ms. Heard had 13 filed for divorce? 14 A While I was -- let's see. Betty Sue 15 was the 20th. That night I spoke to her about the 16 divorce, 21st, was the kicker. 17 I believe it was on the 23rd, and I had 18 already left town for New York to prepare for the 19 tour. 20 Q Did Ms. Heard know that you were out of 21 town at that time? 22 A I don't know.</p>	1844	<p>1 THE COURT: Okay. I assume are you 2 entering this in evidence now? Or are you just 3 showing it to him? 4 MS. MEYERS: I can give them an 5 opportunity and go through it with Mr. Depp, if 6 that's okay. 7 THE COURT: Okay. 8 Q Mr. Depp, do you recognize any of these 9 text messages that are on the screen in front of 10 you? 11 A Vague memory of these. 12 Q And who were these communications 13 between? 14 A Looks like myself in the -- it's me in 15 the green and then Ms. Heard's words in the blue. 16 Q And do your communications reflect that 17 Ms. Heard understands that you're in New York? 18 A I'm sorry? 19 Q What is the date of your text messages 20 here on this page? 21 A That's the 23rd of May 2016, and hers 22 are the 24th of May 2016.</p>

<p style="text-align: right;">1845</p> <p>1 Q And based off of these communications, 2 does this refresh your recollection that Ms. Heard 3 knew that you were in New York on this date? 4 A In her text, you know, "When do you 5 leave?" it was clear that I was leaving right 6 away. But I'm not sure that I wasn't already – 7 because I wasn't in New York City. We weren't 8 playing in New York City; we were playing – we 9 were rehearsing in a casino, a big casino, and 10 that was where we did our first show, you know, 11 first show to practice for the tour, the European 12 tour. 13 So I don't know if I was either leaving 14 for New York, but I don't – I think I was already 15 there because New York City, we weren't – I don't 16 recall that we were playing New York City. So 17 maybe I was suggesting going there. I don't know. 18 Q Can we please turn to page 940 -- 19 excuse me, 494. 20 And, Mr. Depp, do you see the text 21 message from Ms. Heard on May 24th, 2016, at 6:33? 22 A Yes, I do. Yes, I do.</p>	<p style="text-align: right;">1847</p> <p>1 Q Mr. Depp, I'd like to just ask you 2 about a couple statements Ms. Heard makes in this 3 text message. She first says, "Just to confirm 4 that the cover letter is completely private and 5 has nothing to do with any public record." 6 Do you see that, the first sentence in 7 the text message? 8 A Yes, I do. 9 Q Do you know what cover letter Ms. Heard 10 is referring to? 11 A No, I don't. 12 Q Okay. And then she says, "and only 13 included the domestic violence/restraining order 14 stuff because I called the lawyer when the cops 15 were here, and I didn't know what to do or why 16 that happened and was scared." 17 Do you see that? 18 A Yes. 19 Q Do you know what Ms. Heard is referring 20 to when she said that? 21 A No. 22 Q And then dropping down to the bottom,</p>
<p style="text-align: right;">1846</p> <p>1 Q Okay. And do you understand what 2 Ms. Heard is referring to in this text message? 3 A Is it all right if I just take a quick 4 glance? 5 Q Please do. 6 A Thank you. Thank you. That's better. 7 I remember, yes. I recall this. 8 Q And what do you recall about this? 9 A That it made no sense to me. It just 10 didn't make any sense to me, especially about 11 "Well, as long as you don't file, nobody will 12 know." That just didn't – again, I'm not all 13 that familiar with these types of things, but 14 if – I mean, if it's two people in a relationship 15 and the relationship is ending, in any case, the 16 outcome is divorce. So I didn't understand these 17 explanations of "This can happen or it can not 18 happen," or "And I only did this because my 19 lawyers said to." And just didn't make any sense 20 to me, and it looked like she was kind of grabbing 21 at straws, trying to figure out what, in fact, to 22 do.</p>	<p style="text-align: right;">1848</p> <p>1 it says, two lines up, "I thought you filed." 2 Do you see that? 3 A Yes. 4 Q And do you have any understanding as to 5 why Ms. Heard thought you had already filed? 6 A No. I had – on the night of the 20th 7 was when I told her on the phone that I was going 8 to file for divorce, in the way that I've 9 explained it, to keep everything nice and calm, 10 even, but on the 23rd, she filed, and so I hadn't 11 had a chance to file. 12 MS. MEYERS: Your Honor, I would move 13 Plaintiff's Exhibit 487, specifically the portions 14 THE COURT: So you just want page 492 15 to 494? 16 MS. MEYERS: Yes, Your Honor. It's a 17 700-page document. 18 THE COURT: Just page -- well, are you 19 ever going to put more of 487 in, I guess is the 20 question. 21 MS. MEYERS: I believe so, yes. 22 THE COURT: So this is 487A?</p>



1849	1 MS. MEYERS: Certainly. That would 2 make sense. 3 THE COURT: Okay. So 487A, page 492 to 4 494. Any objection to those two pages? 5 MR. ROTTENBORN: No, Your Honor. 6 THE COURT: All right. Those two pages 7 are in. 8 UNKNOWN SPEAKER: Your Honor, just for 9 clarity, is that two pages or three pages? 10 THE COURT: That would be three pages, 11 if that's correct. 12 MS. MEYERS: That's correct. 13 THE COURT: Okay. 492 to 494, okay. 14 MS. MEYERS: And could that please be 15 published to the jury? 16 THE COURT: Okay. 17 Q Mr. Depp, Ms. Heard did end up seeking 18 a temporary restraining order against you, 19 correct? 20 <b>A Yes, she did.</b> 21 Q And what -- I believe you already said 22 this, but could you just remind the jury what date	1851	1 down and please pull up Plaintiff's Exhibit 411. 2 Q Mr. Depp, is this some of the media 3 coverage that you were referring to? 4 <b>A Many things of this nature, yes. Many.</b> 5 Q And do you recall actually seeing this 6 specific article? 7 <b>A I don't remember seeing this specific</b> 8 <b>article. But there were already plenty and</b> 9 <b>certainly more than I was happy to go through.</b> 10 <b>I think once you read one or two of</b> 11 <b>them, the general idea is -- I mean, the point had</b> 12 <b>been made, clearly.</b> 13 MS. MEYERS: Your Honor, I'd move 14 Plaintiff's Exhibit 411 into evidence. 15 THE COURT: Any objection? 16 MR. ROTTENBORN: No, Your Honor. 17 THE COURT: All right. 411 in 18 evidence. 19 MS. MEYERS: Could we please take this 20 down and pull up Plaintiff's Exhibit 414. 21 Q Mr. Depp. 22 <b>A Yes?</b>
1850	1 was that? 2 <b>A The 27th of May.</b> 3 Q And where were you when you learned 4 that Ms. Heard had actually filed a temporary 5 restraining order against you? 6 <b>A I don't recall if we had left for</b> 7 <b>Europe as yet, that is the Hollywood Vampires, for</b> 8 <b>the tour. So I was either in New York State</b> 9 <b>rehearsing and preparing to go to Europe, or I was</b> 10 <b>already in Europe. I would have to check the tour</b> 11 <b>dates.</b> 12 Q Did you find out on the 27th or shortly 13 thereafter? 14 <b>A No, I found out on the 27th. It was</b> 15 <b>everywhere.</b> 16 Q What do you mean when you say, "It was 17 everywhere"? 18 <b>A It was multiplying and multiplying and</b> 19 <b>multiplying throughout media, throughout social</b> 20 <b>media as well, so-called sort of strike media or</b> 21 <b>whatever. And I was taken aback a bit.</b> 22 MS. MEYERS: If we could, take this	1852	1 Q Do you recognize this article at all? 2 <b>A I remember -- yeah, I don't know if it</b> 3 <b>was this one in particular, but I do remember</b> 4 <b>seeing all the various reasons behind the -- or</b> 5 <b>her reasons behind her needing to get a temporary</b> 6 <b>retraining order, a TRO, against me, which they</b> 7 <b>just started to metastasize into these -- they</b> 8 <b>were abuse allegations, and then there was alcohol</b> 9 <b>and then there was drugs and violence. And it</b> 10 <b>just -- it was already right then and there,</b> 11 <b>before my eyes, spinning out of control. And</b> 12 <b>there was not a word that I could say.</b> 13 MS. MEYERS: Your Honor, I would move 14 Plaintiff's Exhibit 414 into evidence. 15 THE COURT: Any objection? 16 MR. ROTTENBORN: No, Your Honor. 17 THE COURT: All right. 414 in 18 evidence. 19 MS. MEYERS: And if we could, take this 20 down now, please, and put up Plaintiff's 21 Exhibit 409. 22 And, Your Honor, if I can move

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1 Plaintiff's Exhibit 409 into evidence as well. 2 THE COURT: Any objection with 409? 3 MR. ROTTENBORN: No objection, Your 4 Honor. 5 THE COURT: All right. 409 in 6 evidence. Thank you. 7 Q Mr. Depp, do you recall seeing this 8 People magazine article? 9 A Yes, I do. 10 Q And when did you see it? 11 A Right when it was released. Right when 12 it came out. 13 Q Did you speak to anyone about this 14 article? 15 A Yes, I did. 16 Q Who did you speak to? 17 A Mostly friends and my sister, Christi. 18 Mostly friends, and, certainly, the band and my 19 kids. I had to alert them that there might be 20 some of the ugly, ugly, ugly things coming out 21 that were most assuredly going to put me in the 22 position of some violent, drug-addled, alcoholic,	1 thing. 2 This was before, in fact, the #MeToo 3 movement had come around. This was a while before 4 that. So I couldn't have expected the #MeToo 5 movement to happen, but once that happened, then 6 it just went into skyrocket mode. Say you're 7 showered with, you know, you're running between 8 drops of lava. You're trying to run between 9 raindrops that kill you, destroy you. 10 So I was very confused. I was very 11 hurt because as I said before, when you're in a 12 relationship and you do give your truth to -- 13 intimate truths to that person that you're with 14 and then they start to use all that information 15 like -- and stretch it out into something that's 16 completely shocking because, as I said, it just 17 didn't -- it just didn't happen. 18 And so I felt like it was an incredibly 19 cruel and treachery. I felt it was treachery. I 20 don't know if she wanted me to be erased or drop 21 dead or just let me stick around and allow her to 22 ruin my life for a while and go out of her way to
1854	1856
1 you know, just reprobate, and I wanted to warn 2 them before they were approached with the People 3 magazine cover in school by other kids, you know. 4 I wanted to be able to tell -- explain to them 5 that this was going to be visible and it's going 6 to be everywhere, and I apologized to them that 7 this was happening. 8 Q Have you ever been accused of 9 physically abusing a woman before this point? 10 A No. No. 11 Q How would you describe the impact of 12 these allegations at the time they were made? 13 MS. MEYERS: And if you could, please 14 take this down. 15 A I felt ill. I felt sick. I mean, sick 16 in a sense that -- that I -- there was no truth in 17 it. There was no truth in it whatsoever. And the 18 fact that it was coming down on me so hard and so 19 quickly and how it -- it gained momentum around 20 the world. And then you notice people looking at 21 you differently. And then you notice calls stop 22 coming from agents and producers and that sort of	1 shame me and hurt my kids and hurt people who I've 2 known for many, many years. 3 You know, it was -- I mean, to say that 4 it was unfair is about the largest understatement 5 that I -- it's actually the smallest 6 understatement. I mean, it controlled my every 7 waking second from the moment that I woke up until 8 the moment that I dropped, even on the road 9 playing shows. You'd go out and you'd play for an 10 hour and a half or two hours, and then you'd do 11 your best to get through that. 12 And I can remember getting off of 13 the -- finishing the show, getting on the bus with 14 the other band members, and just going to the back 15 of the bus and just, you know, you had to get it 16 out. So I just sat back and -- in the back of the 17 bus and cried and hid it from people. 18 Q Mr. Depp, did you ever have -- did you 19 ever discuss Ms. Heard's domestic abuse 20 allegations with any producers or directors in the 21 movie industry? 22 A Only if they fell into the category of

<p style="text-align: right;">1857</p> <p>1 friends. For example, Tim Burton, who was one of 2 my dearest friends, known him since we made Edward 3 Scissorhands together in 1990 and we've been very, 4 very close friends ever since then -- yeah. Just 5 friends, you know, I -- and then, of course, as we 6 were on the road, you know, the fellows in the 7 band, you know, Alice -- I'm sorry. Alice Cooper 8 is the singer of the Vampires, is a dear friend, 9 and Joe Perry of Aerosmith is in the band and he's 10 also a dear friend, and then a couple of the 11 members are just -- yeah, very close friends. 12 And I was bereft of any -- you just 13 don't know what to say anymore. You just know 14 what to -- so I tried not to talk about it very 15 much at all. Well, just to friends. 16 Q Mr. Depp, when did you and Ms. Heard 17 divorce? 18 A When was the divorce final? 19 Q Yes. 20 A The divorce was final January 2017, on 21 Friday the 13th. 22 Q And how were your divorce proceedings</p>	<p style="text-align: right;">1859</p> <p>1 connection with your divorce? 2 A Yes. 3 Q And how much was that? 4 A Her settlement, she wanted \$7 million. 5 I believe that was the settlement, wasn't it? 6 Yes, \$7 million. 7 Q And was there a joint statement that 8 you and Ms. Heard released? 9 A Yes. That's where I was getting -- the 10 advice that I was given was to not to fight -- 11 MR. ROTTENBORN: Objection, Your Honor. 12 Hearsay. 13 THE COURT: All right. I'll sustain 14 the objection. 15 Next question. 16 Q Who wrote the joint statement? 17 A No idea. Lawyers. 18 Q Did you approve the joint statement 19 before it was issued? 20 A I'll put it this way: I wasn't given 21 much of a choice. 22 MS. MEYERS: Could we please pull up</p>
<p style="text-align: right;">1858</p> <p>1 resolved, ultimately? 2 A My team of lawyers, which would include 3 two of my entertainment lawyers, my divorce 4 attorney, and two more attorneys, Blair Berk and 5 someone else, they -- I wanted to -- I wanted to, 6 for lack of a better word, I wanted to fight it. 7 I wanted to fight it because it was -- because 8 there wasn't an ounce, not a grain, not a molecule 9 of truth to it, so I wanted to fight it. 10 They -- 11 MR. ROTTENBORN: Calls for hearsay, 12 Your Honor. 13 THE COURT: All right. 14 MS. MEYERS: He was speaking about what 15 he wanted to do in the context of the divorce. 16 THE COURT: I understand. 17 MR. ROTTENBORN: I think it's -- 18 THE COURT: I think the next one was 19 going to be "They said." I don't know. 20 So you can do your next question. 21 MS. MEYERS: Certainly. 22 Q Did you pay Ms. Heard any money in</p>	<p style="text-align: right;">1860</p> <p>1 Plaintiff's Exhibit 408. 2 Q And, Mr. Depp, do you see the second 3 paragraph from the bottom of this page, is that 4 the joint statement that you and Ms. Heard 5 released together? 6 A That's the joint statement that was 7 released, yes. 8 Q And could you please read that joint 9 statement for the jury? 10 A "Our relationship is intensely 11 passionate and at times volatile, but always bound 12 by love. Neither party has made false accusations 13 for financial gain. There was never any intent of 14 physical or emotional harm. Amber wishes the best 15 for Johnny in the future. Amber will be donating 16 financial proceeds from the divorce to a charity." 17 Q What happened after this joint 18 statement was issued, Mr. Depp? 19 A What happened after that? I suppose, 20 you know, the next move was to start making 21 payments to Ms. Heard. They were scheduled 22 payments, and then at a certain point, Ms. Heard</p>

1861	<p>1 had made statements to the press saying that the 2 7 million was going to be -- the 7 million was the 3 settlement, and that 7 million was going to be 4 split up between two charities. One was the ACLU, 5 and the other was the Children's Hospital of 6 Los Angeles, which, in fact, was a breach of the 7 agreement.</p> <p>8 Neither one of us was supposed to speak 9 about details, money, anything of that nature. So 10 when Ms. Heard breached that agreement, that was 11 when I asked Ed White, my business manager, to 12 send the first payments directly to the charities 13 in Ms. Heard's name, and after I did that, 14 Ms. Heard was very, very angry that I had made 15 those first payments. And she went into a kind of 16 a tirade about how I should be charged double the 17 7, I should be charged 14 million, so that -- 18 because she thought that I was looking for a tax 19 break.</p> <p>20 Q Mr. Depp, between the time that the 21 joint statement was released and the time that the 22 op-ed came out, how many movies did you work on in</p>	1863	<p>1 MR. ROTTENBORN: Yes, Your Honor. I 2 think a part. We don't have any objection to the 3 joint statement that was read, but the rest of the 4 article contains hearsay statements that we think 5 should be redacted.</p> <p>6 THE COURT: Okay.</p> <p>7 MS. MEYERS: We can redact that.</p> <p>8 THE COURT: So you owe me a redacted 9 408 with just the statement, then; is what you're 10 talking about?</p> <p>11 MR. ROTTENBORN: Just that second to 12 last paragraph.</p> <p>13 THE COURT: Okay. All right. That 14 statement will be in evidence once it's redacted.</p> <p>15 MS. MEYERS: Thank you.</p> <p>16 THE COURT: Uh-huh.</p> <p>17 MS. MEYERS: If we could, please pull 18 up Plaintiff's Exhibit 1.</p> <p>19 Q Mr. Depp, do you recognize this 20 document?</p> <p>21 A Excuse me. Yes, I do.</p> <p>22 Q And what is it?</p>
1862	<p>1 that time period if you can recall?</p> <p>2 A When did the joint statement come out? 3 Was it -- I'm sorry.</p> <p>4 MS. MEYERS: Could we scroll up, 5 please.</p> <p>6 Q I'll withdraw the question for the 7 moment.</p> <p>8 In the time leading from the divorce 9 through the -- excuse me. In the time period 10 between when your divorce was finalized and the 11 release of the op-ed in December 2018, do you have 12 any idea of how many television or movie projects 13 you worked on?</p> <p>14 A I don't exactly. I don't exactly. I 15 believe there was another, maybe a smaller tour 16 with the Vampires, and it's -- I don't remember. 17 It's hard to remember. I've done too many movies.</p> <p>18 Q That's okay.</p> <p>19 A Sorry.</p> <p>20 MS. MEYERS: Your Honor, I apologize. 21 Can we please move into evidence Exhibit 408.</p> <p>22 THE COURT: Any objection to 408?</p>	1864	<p>1 A This is Ms. Heard's op-ed for the 2 Washington Post that I believe came out in 3 December of '18. I recognize the -- yes, I 4 certainly remember this.</p> <p>5 Q And have you actually read this op-ed?</p> <p>6 A Yes, I have.</p> <p>7 Q And what do you think of it, its 8 contents?</p> <p>9 A Well, it was a hell of a start, I'd 10 say, in terms of the title.</p> <p>11 THE WITNESS: If you could -- can we 12 scroll down a little bit just for a second? 13 Because I'd like to make a point.</p> <p>14 A Going, reading it and reading the words 15 that she had written about what was obviously -- 16 it was obviously referring to our relationship, it 17 was obviously referring to me, "two years ago," 18 you know, it all matched up, so it was clearly 19 about me.</p> <p>20 And then I read the rest of the article 21 where she talks about --</p> <p>22 THE WITNESS: If you could scroll down</p>

1865	1 just a little bit. 2 A -- after the "Imagine a powerful man as 3 a ship," because she goes into -- she talks about, 4 in this section of the piece, she talks about the 5 plight of women not just in Hollywood, but in 6 general in the world, and there were -- there were 7 many things that I did not disagree with in terms 8 of this part of the article, and I understand 9 anyone's passion to right the wrongs that have 10 been done for countless years against any being 11 who's suffered at the hand of domestic violence, 12 be it women, men, children. That's something, of 13 course, coming from my background, that I am very 14 against any bullying of any human being, any 15 forced violence, any injustice committed against 16 any human being. 17 So all of this part of the article was, 18 strangely, it was -- I understood it very well, 19 and I can applaud some of this. I can absolutely 20 say that I believe that it was very well done with 21 regard to violence against women or violence 22 against anyone. It just seemed kind of the	1867	1 THE COURT: All right. 2 MS. MEYERS: We can move on, Your 3 Honor. 4 THE COURT: If you want to just 5 restart. 6 THE WITNESS: So I can read it out of 7 someone's article but not from the man's mouth? 8 Is that what happens? 9 THE COURT: Next question. 10 Q Mr. Depp, what, to your understanding, 11 is the status of Pirates 6? 12 A At this point? 13 Q Yes. 14 A I believe it's in dangle mode. 15 Q Mr. Depp, have you ever physically 16 assaulted Ms. Heard? 17 A Never. 18 Q Have you ever sexually assaulted 19 Ms. Heard? 20 A Never. Certainly not. 21 Q What have you lost as a result of 22 Ms. Heard making these allegations against you?
1866	1 strange other side that could, you know, it's like 2 a two-headed coin. 3 Q Mr. Depp, did you experience any 4 consequences after the release of the op-ed? 5 A Absolutely. 6 Q And what were those? 7 A Yes. All right. Well, I believe it 8 was -- I don't think it took Disney very long, 9 maybe a couple of days, to announce that I had 10 been removed from the Pirates of the Caribbean 11 films, franchise, which I learned about reading 12 in -- reading one of these type of -- well, some 13 magazine, the article where Sean Bailey was 14 quoted, which was very odd to me, as I have had 15 many creative conversations with the Disney people 16 even to the point of where they were asking me to 17 come, if I can write -- 18 MR. ROTTENBORN: Objection, Your Honor. 19 THE COURT: Hold on. 20 THE WITNESS: Sorry. 21 MR. ROTTENBORN: What Disney executives 22 told him is hearsay.	1868	1 A Nothing less than everything. Nothing 2 less than everything. Because when the 3 allegations were made, when the allegations were 4 rapidly circling the globe, telling people that I 5 was a drunken, cocaine-fueled menace who beat 6 women, suddenly in my 50s, it's over. You know, 7 you're done. 8 So what did it do to me? What effect 9 did it have on me? I'll put it to you this way: 10 No matter the outcome of this trial, the second 11 the allegations were made against me, the 12 accusations, the second that more and more of 13 these things, as I said, metastasized and turned 14 into fodder for the media, once that happens, or 15 once that happened, I lost then. That is to say I 16 lost because that is not a thing that anyone is 17 going to just put on your back for a short period 18 of time. I will live with that for the rest of my 19 life because of the allegations and because it was 20 such a high-profile case. 21 So I lost then, no matter the outcome 22 of this trial. I'll carry that for the rest of my

<p>1869</p> <p>1 days. And it never had to be that way. It never 2 had to happen. And I don't quite understand why 3 it did in the way that it did. 4 MS. MEYERS: I have no further 5 questions, Your Honor. 6 THE COURT: All right. I think it's, I 7 say we'd rather start tomorrow morning; is that 8 correct? 9 MR. ROTTENBORN: I'm perfectly happy to 10 start now, Your Honor, or tomorrow morning, 11 whatever Your Honor prefers. 12 THE COURT: Why don't we go ahead and 13 start a little today, just because time is not on 14 our side? Okay. Thank you. Cross-examination. 15 EXAMINATION BY COUNSEL FOR THE DEFENDANT AND 16 COUNTERCLAIM PLAINTIFF 17 BY MR. ROTTENBORN: 18 Q Good afternoon, Mr. Depp. 19 A Good afternoon, Mr. Rottenborn. 20 Q I'm happy that in the last little bit, 21 we've gotten to the reason why we're here, and I'd 22 like to start with that.</p>	<p>1871</p> <p>1 A Could you make it a little bigger? 2 Q Sure. 3 A My eyes are getting smaller. 4 Q And this is what you're suing her over, 5 correct? 6 A I'm suing her over defamation and the 7 various falsities that she used to bring my life 8 to an end. 9 Q And you understand, Mr. Depp -- 10 A A lot of things. 11 Q You understand, Mr. Depp, that you 12 cannot -- you are not suing her for any damage, 13 alleged damage, or any accusations she made prior 14 to writing this article? You're aware of that? 15 You'd agree with that, right? 16 A Could you say that again, 17 Mr. Rottenborn? 18 Q You are not bringing a lawsuit against 19 her, bringing her into court in Virginia for 20 anything that she did prior to writing this 21 article, correct? You know that you can't do 22 that, right?</p>
<p>1870</p> <p>1 MR. ROTTENBORN: If you could, please 2 pull up Plaintiff's Exhibit 2, Michelle. Next 3 page. 4 MR. ROTTENBORN: Your Honor, I believe 5 this is either in evidence or has been stipulated 6 as part of the opening. 7 THE COURT: I suspect no objection. 8 MS. MEYERS: No objection, Your Honor. 9 MR. ROTTENBORN: Permission to publish? 10 THE COURT: Yes, sir. 11 Q This article, this opinion piece in the 12 middle of the page there, Mr. Depp, this is the 13 opinion piece that Amber Heard wrote in the 14 Washington Post that was published on 15 December 18th, 2018, correct? 16 A Doesn't that say December 19th on it at 17 the top of the page? Doesn't that say 18 December 19th, 2018? I think 2018 was the online, 19 was it not? 20 Q Okay. So December 18th, December 19th, 21 this piece in the middle of the page is the 22 opinion piece Ms. Heard wrote, right?</p>	<p>1872</p> <p>1 A I have to say that I -- as I said, the 2 top of this, I've never seen this version of the 3 op-ed piece. The version that I saw was the other 4 one that I identified that was on the 18th. This 5 is on the 19th. I believe the 18th -- 6 Q What year? 7 A -- was quite possibly -- sorry. Was 8 quite possibly maybe that was the online version 9 that came out first. 10 Q Two years before the online -- 11 A I'm sorry. I was just going to finish 12 my answer. 13 Q I think you answered my question, sir. 14 Thank you. 15 A Oh, okay. 16 Q Two years before the online and the 17 print version came out -- 18 A Uh-huh. 19 Q -- in 2016, Amber obtained a domestic 20 violence restraining order against you from a 21 California court, correct? 22 A Yes, sir.</p>

1873	<p>1 Q And in obtaining that domestic violence 2 restraining order in May 2016, she accused you of 3 domestic abuse, right? 4 A Yes, sir. 5 Q And -- 6 MR. ROTTENBORN: Michelle, if you could 7 blow up the third paragraph down, please. 8 Q And in the opinion piece that's before 9 you, published in the Washington Post, she wrote 10 "Then two years ago, I became a public figure 11 representing domestic abuse," correct? 12 A I can't say correct. She wrote it or 13 somebody wrote it. 14 Q And the piece doesn't contain your 15 name, correct? 16 A No, it does not, no. 17 Q And other than mentioning the fact of 18 abuse accusations that were made two years prior 19 to the publication of this article, the opinion 20 piece doesn't contain any details of your time 21 together, correct? 22 A I think that her -- I think it's very</p>	1875	<p>1 opinion piece does not contain any details of your 2 time together, yes or no? 3 A It contains fragments. This piece 4 here, I don't know. Is this word for word with 5 the other piece? 6 Q And the article discusses proposed 7 legislation which you just talked about, correct? 8 You'd agree with that, right? 9 A Yes, yes. 10 Q And it discusses Amber's experiences 11 after she had separated from you. 12 You'd agree with that, right? 13 A "Two years ago I became the public face 14 for domestic violence." 15 2018, 2016. It seemed to me that it -- 16 the puzzle was going to work no matter your angle, 17 sir. 18 Q Okay. So I'll take that response as a 19 no, that this piece does not discuss -- that this 20 piece does not discuss anything prior to Ms. Heard 21 separating from you, and it only discusses her 22 experiences, her biographical experiences, after</p>
1874	<p>1 easy to write a piece and put the finger on 2 someone without saying their name. There are 3 sneaky ways of writing things. And as I've seen, 4 also, what the ACLU and their team had to say, 5 they clearly described to Ms. Heard that -- 6 MR. ROTTENBORN: I'll move to strike 7 this as hearsay, Your Honor. 8 THE COURT: All right. I'll do that. 9 MR. ROTTENBORN: And I'd appreciate -- 10 THE WITNESS: So it's evidence. 11 THE COURT: Next question, okay? 12 MR. ROTTENBORN: Thank you, Your Honor. 13 Q Mr. Depp, I appreciate you've gotten a 14 lot of chance to talk, and I'm trying to be 15 respectful of the Court's time and the jury's 16 time. So I'm going to ask you that question again 17 because I think it's a pretty simple yes-or-no 18 question, which is -- 19 A You'd like it to be, sir. There's 20 nothing simple in this case. 21 Q -- other than mentioning the fact of 22 abuse accusations made two years prior, this</p>	1876	<p>1 she separated from you, correct? 2 A I can't say that. 3 Q Okay. Now, you're claiming that due to 4 Amber's allegations of abuse, you can't be in 5 Pirates 6, correct? 6 A I'm saying that after everything had 7 basically hit its media targets and the hit pieces 8 kept coming, it would be -- I mean, I would be a 9 real simpleton to not think there was an effect on 10 my career based on Ms. Heard's words whether they 11 mentioned my name or not. 12 Q You became aware prior to the 13 publication of this op-ed that you were likely out 14 for Pirates 6, that Disney was considering 15 dropping or dramatically shrinking your role, 16 correct? 17 A No. 18 MR. ROTTENBORN: Can you pull up 19 Defendant's Exhibit 113, please. Let's go to -- 20 let's go to 114, please. 21 THE COURT: Are you changing on me? 22 MR. ROTTENBORN: Yeah. I'm sorry, Your</p>

1877	1 Honor. The next one. 2 THE COURT: Okay. 114. All right. 3 MR. ROTTENBORN: Sorry, one more. 115, 4 please. 5 THE COURT: 115. 6 Q Mr. Depp, do you see -- 7 A <b>Personal dramas, yes.</b> 8 Q Sorry. 9 THE COURT: Do you have a question, 10 Mr. Rottenborn? 11 MR. ROTTENBORN: I did. I was just 12 giving him time to read. 13 Q Do you see the date of this article 14 beneath those bullet points is October 25th, 2018? 15 Do you see that? 16 A <b>Yes, I do.</b> 17 Q And do you see that the headline "Hide 18 the Rum: Johnny Depp is Out as Jack Sparrow in 19 Disney's Pirates of the Caribbean"? 20 MS. MEYERS: Same objection, hearsay. 21 THE COURT: Hearsay objection. 22 MR. ROTTENBORN: I was asking if he	1879	1 <b>wife beater.</b> 2 Q Understood. But you -- 3 A <b>So I'm sure that Disney was trying to 4 cut ties to be safe. The #MeToo movement was in 5 full swing at that point.</b> 6 Q Right. And to the extent that they 7 were trying to cut ties to be safe, that was as 8 long as two months before you [sic] wrote the 9 op-ed? 10 MS. MEYERS: Objection. Calls for 11 speculation. 12 THE COURT: I'll allow it if he can 13 answer it. 14 A <b>I'm sorry, the question?</b> 15 Q To the extent that Disney was trying to 16 cut ties with you, as you say to be safe, that was 17 as much as two months prior to you publishing -- 18 to Ms. Heard publishing the op-ed in the 19 Washington Post, correct? 20 MS. MEYERS: Objection. Lack of 21 foundation. 22 THE COURT: I'll allow it if he can
1878	1 became aware, not offering the article for the 2 truth, his awareness. 3 MS. MEYERS: This is an article from 4 the Daily Mail, Your Honor. 5 MR. ROTTENBORN: Right. I'm asking his 6 awareness that he was likely out. 7 THE COURT: I'll allow that question. 8 MR. ROTTENBORN: Thank you. 9 THE COURT: Okay. 10 Q So, Mr. Depp -- 11 A <b>Yes.</b> 12 Q -- were you aware that as of 13 October 25th, 2018, about two months before this 14 op-ed was published, that it was being reported, 15 as it is in this article, that Johnny Depp is out 16 as Jack Sparrow in Disney's Pirates of the 17 Caribbean film franchise as actor battles 18 financial issues and personal dramas? 19 Were you aware of that? 20 A <b>I wasn't aware of that, but it doesn't 21 surprise me given that two years had gone by of 22 just constant worldwide talk about me being this</b>	1880	1 answer it. 2 A <b>October is two months before December; 3 that's correct.</b> 4 <b>But it's an honor that they were going 5 to release me from my role as Captain Jack Sparrow 6 yet kept me on every ride across the world. I'm 7 in the Pirates of the Caribbean rides. I'm in the 8 Los Angeles or the Hollywood one or whatever it 9 is, three or four times, Shanghai, I mean all over 10 the world. So they didn't remove my character 11 from the rides. They didn't stop selling 12 merchandise of Captain Jack Sparrow. They didn't 13 stop selling dolls of Captain Jack Sparrow. They 14 didn't stop selling anything. They just didn't 15 want there to be something trailing behind me that 16 they'd find.</b> 17 Q And you weren't aware -- you said 18 Pirates 6 in your view is dangling. You're not 19 aware if or when Pirates 6 will be made, correct? 20 A <b>No, sir, no.</b> 21 Q And the fact is, Mr. Depp, if Disney 22 came to you with \$300 million and a million



<p style="text-align: right;">1881</p> <p>1 alpacas, nothing on this earth would get you to go 2 back and work with Disney on the Pirates of the 3 Caribbean film? 4 <b>A That is true, Mr. Rottenborn.</b> 5 Q And you couldn't identify a single 6 movie that you had did between the divorce and the 7 op-ed in response to Ms. Meyers's questions just 8 now. You said there was a small tour of your band 9 between that, but you couldn't identify a single 10 movie that you did in the year or two prior to the 11 op-ed, correct? 12 <b>A I have to tell you that when I'm 13 working on a film, I do my work, and when I'm 14 wrapped on that film, I've done my work, I move on 15 to the next. So I haven't seen the majority of my 16 films. I've seen a few only if I had to. So it 17 doesn't come right away to my head. Films are not 18 the first things that I think about.</b> 19 Q And you spent a lot of time talking 20 about the impact of the abuse allegations made in 21 Ms. Heard's obtaining the temporary restraining 22 order in -- or the domestic violence restraining</p>	<p style="text-align: right;">1883</p> <p>1 Q This was a document that you signed as 2 part of your divorce proceedings, correct? 3 <b>A That's my signature indeed, yes.</b> 4 MR. ROTTENBORN: Your Honor, move for 5 admission of this document. 6 THE COURT: Any objection to that 7 document? 8 MS. MEYERS: No objection, Your Honor. 9 THE COURT: All right. 1458 in 10 evidence. 11 MR. ROTTENBORN: May we publish, 12 please? 13 THE COURT: Yes, sir. 14 Q Mr. Depp, that is your signature on the 15 right, correct? 16 <b>A Yes, it is.</b> 17 Q Dated August 15th, 2016, right? 18 <b>A That's what it says, yes.</b> 19 Q And this is -- you were -- this is a 20 document you signed, right? 21 <b>A For the third time, that is my 22 signature, yes.</b></p>
<p style="text-align: right;">1882</p> <p>1 order in May of 2016, right? 2 <b>A True.</b> 3 Q And you said, you testified that you 4 wanted to fight it, right? 5 <b>A Yes.</b> 6 Q But the fact is you never fought the 7 allegations in court in 2016. It was only after 8 Ms. Heard published the op-ed in 2018 that you 9 fought them. You never tried to fight them in 10 2016, did you? 11 <b>A I was advised by my attorneys not to 12 fight.</b> 13 Q In fact, you signed -- not only the -- 14 we read a statement -- 15 MR. ROTTENBORN: But let's pull up 16 DX1458, please. 17 Q Mr. Depp, you see that this says 18 "Marriage of Depp," correct? 19 <b>A I see that.</b> 20 Q It's a legal document? 21 MR. ROTTENBORN: Can you scroll to the 22 signature page, Michelle, please?</p>	<p style="text-align: right;">1884</p> <p>1 MR. ROTTENBORN: Can you go to 2 paragraph 27, please. 3 <b>A Paragraph?</b> 4 Q Paragraph 27. 5 <b>A Okay.</b> 6 Q And this paragraph is a joint statement 7 that both sides agreed to release. And if you 8 look in the black quote there, it contains the 9 quote, or contains the statement, "Neither party 10 has made false accusations for financial gain." 11 "Neither party has made false 12 accusations for financial gain." Did I read that 13 right? 14 <b>A You did, Mr. Rottenborn.</b> 15 MR. ROTTENBORN: Take that down, 16 Michelle. 17 Q And that was a document you signed in 18 August of 2016, correct? 19 <b>A Is that the same one that I signed a 20 few times before? Yes. That's the --</b> 21 Q I just want to make clear that you 22 signed that in the summer of 2016, two years</p>

<p style="text-align: right;">1885</p> <p>1 before Ms. Heard published her op-ed. 2 MR. ROTTENBORN: I don't have anything 3 else for today, Your Honor. 4 THE COURT: All right. We'll go ahead 5 and take our evening -- 6 MR. ROTTENBORN: If that's okay. 7 THE COURT: That works for me. I was 8 going to stop you at 5:00 anyway, so that's fine. 9 All right. 10 Ladies and gentlemen, that will 11 conclude our day today. Again, don't do any 12 outside research. Do not talk to anybody. We'll 13 see you in the morning, okay? 14 All right. Have a good evening. 15 (Whereupon, the jury exited the 16 courtroom and the following proceedings took 17 place.) 18 THE COURT: All right. Again, sir, 19 just don't discuss your testimony with anybody 20 since you're still testifying, to include your 21 attorneys, okay? We'll see you in the morning, 22 okay?</p>	<p style="text-align: right;">1887</p> <p>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 21st 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</p>
<p style="text-align: right;">1886</p> <p>1 THE WITNESS: Thank you. 2 THE COURT: 10:00. 3 MS. MEYERS: Thank you, Your Honor. 4 MR. ROTTENBORN: Thank you, Your Honor. 5 THE COURT: Okay. 6 THE BAILIFF: All rise. 7 (Whereupon, the trial was recessed at 8 4:59 p.m. to reconvene at 10:00 a.m., Thursday, 9 April 21, 2022.) 10 11 12 13 14 15 16 17 18 19 20 21 22</p>	