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Transcript of Jury Trial - Day 16

Date: May 5, 2022
Case: Depp, II -v- Heard

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Transcript of Jury Trial - Day 16
Conducted on May 5, 2022

1 (4322 to 4325)

4322	4324
<p>1 VIRGINIA: 2 IN THE CIRCUIT COURT OF FAIRFAX COUNTY 3 -----x 4 JOHN C. DEPP, II, : 5 Plaintiff and : 6 Counterclaim Defendant, : 7 v. : Civil Action No.: 8 AMBER LAURA HEARD, : CL-2019-0002911 9 Defendant and : 10 Counterclaim Plaintiff. : 11 -----x 12 HEARING 13 BEFORE THE HONORABLE PENNEY AZCARATE 14 Fairfax, Virginia 15 Wednesday, May 4, 2022 16 10:00 a.m. EDT 17 TRIAL DAY 15 18 19 20 Job No.: 443897 21 Pages: 4322 - 4628 22 Reported by: Judith E. Bellinger, RPR, CRR</p>	<p>1 A P P E A R A N C E S 2 3 ON BEHALF OF THE PLAINTIFF AND COUNTERCLAIM 4 DEFENDANT: 5 BENJAMIN G. CHEW, ESQUIRE 6 BROWN RUDNICK LLP 7 601 Thirteenth Street NW 8 Suite 600 9 Washington, D.C. 20005 10 202.536.1700 11 12 CAMILLE M. VASQUEZ, ESQUIRE 13 SAMUEL A. MONIZ, ESQUIRE 14 BROWN RUDNICK LLP 15 2211 Michelson Drive 16 7th Floor 17 Irvine, CA 92712 18 949.440.0234 19 20 21 22</p>
4323	4325
<p>1 Held at: 2 3 4 CIRCUIT COURT OF FAIRFAX COUNTY 5 4110 Chain Bridge Road 6 Courtroom 5J 7 Fairfax, Virginia 22030 8 703.691.7320 9 10 11 12 13 14 15 16 17 18 19 20 21 22</p>	<p>1 2 A P P E A R A N C E S C O N T I N U E D 3 4 JESSICA N. MEYERS, ESQUIRE 5 BROWN RUDNICK LLP 6 7 Times Square 7 New York, NY 8 212.209.4938 9 10 REBECCA MACDOWELL LECAR0Z, ESQUIRE 11 BROWN RUDNICK LLP 12 One Financial Center 13 Boston, MA 02111 14 617.856.8149 15 16 17 18 19 20 21 22</p>

Transcript of Jury Trial - Day 16
 Conducted on May 5, 2022

2 (4326 to 4329)

4326				4328			
1				1	525	4604	4604
2	A P P E A R A N C E S C O N T I N U E D			2	1090	4339	4339
3	O N B E H A L F O F T H E D E F E N D A N T A N D C O U N T E R C L A I M			3	1091	4334	4334
4	P L A I N T I F F :			4	1092	4443	4443
5				5	1095	4335	4335
6	E L A I N E C H A R L S O N B R E D E H O F T , E S Q U I R E			6	1804	4495	4496
7	A D A M S . N A D E L H A F T , E S Q U I R E			7	1805	4495	4496
8	C H A R L S O N B R E D E H O F T C O H E N B R O W N &			8	1806	4495	4496
9	N A D E L H A F T , P . C .			9	1807	4495	4496
10	11260 Roger Bacon Drive			10	1808	4495	4496
11	Suite 201			11	1809	4493	4493
12	Reston, VA 20190			12	1810	4495	4496
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16	W O O D S R O G E R S P L C			16	1815	4495	4496
17	10 South Jefferson Street			17	1816	4495	4496
18	Suite 1400			18	1817	4495	4496
19	P.O. Box 14125			19	1819	4495	4496
20	Roanoke, VA 24011			20	1820	4495	4496
21	540.983.7540			21	1821	4495	4496
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4327				4329			
1	E X H I B I T S			1	1827	4495	4496
2	Offered	Admitted		2	1828	4495	4496
3	Defendant's			3	1829	4495	4496
4	188A	4357	4357 (redacted)	4	1830	4495	4496
5	205	4412	4414	5	1831	4495	4496
6	272	4451	4451	6	1834	4495	4496
7	310	4456	4456 (redacted)	7	1835	4495	4496
8	321	4466	4466	8	1837	4495	4496
9	509	4602	4602	9	1838	4495	4496
10	510	4594	4594	10	1839	4495	4496
11	511	4602	4603	11	1840	4495	4496
12	512	4603	4603	12	1841	4495	4496
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21	523	4600	4600	21			
22	524	4601	4601	22			

4330	1 PROCEEDINGS 2 THE BAILIFF: All rise. 3 Please be seated and come to order. 4 THE COURT: Good morning. 5 All right. Before the jury comes out, 6 I want to let you know, for planning purposes, I 7 plan to go until 5:30 today because we lost a 8 little time throughout the week. So, we will go 9 to 5:30 today. 10 Starting when we come back, on 11 May 16th, I want to start at 9:00. So we will be 12 going 9 to 5 starting those last two weeks, just 13 to give us a little bit more of a factor there so 14 we can get all our time in, okay? 15 MS. BREDEHOFT: Just two exhibits. 16 Defendant's 167 and 170. I've already given -- 17 THE COURT: Defendant's 167. 18 MS. BREDEHOFT: And 170 with 19 redactions. 20 THE COURT: Okay. Perfect. 21 MS. BREDEHOFT: We're still working 22 with counsel on redactions on one of the	4332	1 were talking about the Bahamas and the yacht and 2 flying out in a helicopter. 3 I'm going to just ask you to take a 4 look at -- 5 MS. BREDEHOFT: Michelle, if you can 6 bring up Defendant's Exhibit 1091. I think that's 7 1090. Scary that I would know that. 8 Q Do you recognize this picture? 9 A Yes. That looks like the picture I 10 took of Johnny in July, around July of 2013. 11 Q Okay. And why did you take this 12 picture? 13 A Because, at the time, there were -- I 14 was already sensitive. I had been in a 15 relationship with Johnny for over a year, you 16 know, coming up on two years, and I had already 17 noted that there was this pattern of behavior 18 changes with him that would make my life 19 significantly more complicated or peaceful, 20 difficult, or wonderful, depending on what the 21 cycle -- what he was using. And I only could tell 22 that he was using because I had -- I would have to
4331	1 plaintiff's exhibits from yesterday. 2 THE COURT: Okay. So we've got those 3 two. All right. 4 MS. BREDEHOFT: Thank you. 5 THE COURT: Anything else before the 6 jury comes out? 7 MR. CHEW: No, Your Honor. 8 THE COURT: Okay. Thank you. 9 Get the jury. 10 (Whereupon, the jury entered the 11 courtroom and the following proceedings took 12 place.) 13 THE COURT: Good morning, ladies and 14 gentlemen. 15 I just wanted to let you know that 16 today we're going to go until 5:30. So I just 17 wanted to let you know at the beginning of the day 18 that we'll be going until 5:30, okay? Thank you. 19 All right. Your next question, ma'am. 20 MS. BREDEHOFT: Thank you, Your Honor. 21 BY MS. BREDEHOFT: 22 Q Amber, when we finished yesterday, we	4333	1 look for clues and, you know, he would pass out 2 and, you know, get sick and lose control of 3 himself. And then people would pick him up and 4 clean him up and fix it. 5 And he wouldn't either remember or he 6 would deny it or he would accuse me of saying that 7 this had happened when it didn't. And there was 8 no one to back me up. You know, there was no -- 9 it was just his employees and everyone who had 10 been taking care of him versus my word. And so I 11 started to take pictures to say, look, this is 12 happening. This is, you know -- I understood 13 enough about addiction to know that you have to 14 hit rock bottom. Like, you have to have some 15 consequence for your action or for your behavior, 16 if you ever change to get better. And it seemed, 17 to me, like that was not happening, so I -- I 18 noticed a behavior pattern change and he started 19 to, instead of, you know, fits of rage, he started 20 to pass out a lot and fall asleep and kind of fall 21 asleep mid conversation. It was just a pattern 22 change. So I started to pick up on the clues so I

<p>4334</p> <p>1 could figure out what I was dealing with. 2 MS. BREDEHOFT: Your Honor, I would 3 like to move the admission of Exhibit 1091. 4 THE COURT: Any objection? 5 MS. VASQUEZ: No objection, Your Honor. 6 THE COURT: 1091 in evidence. You can 7 publish. 8 MS. BREDEHOFT: Thank you, Your Honor. 9 Q And, Ms. Heard, and what is depicted in 10 this picture? Please tell the jury. 11 A Johnny passed out on the island where 12 we were vacationing. He had had a bit of a stint 13 of sobriety right before this, and it started to 14 change with his friend Paul Bettany, and – 15 Q Okay. 16 A Yeah. 17 Q Now I'm going to ask you -- 18 MS. BREDEHOFT: Michelle, can you bring 19 up Defendant's Exhibit 1095. 20 Q We talked about March 2013 yesterday, 21 and I just wanted to bring this up quickly. 22 Do you recognize this picture?</p>	<p>4336</p> <p>1 A That would go for a period of time, and 2 then a major blowup, and then he would get sick 3 and pass out and feel really awful, and often, 4 including this time, would start a period of 5 sobriety after that. 6 Q Okay. Now, I'm going to take you to 7 mid July 2013, the Tokyo press tour for 8 Lone Ranger. 9 Can you, please, tell the jury about 10 that particular trip and the events relating to 11 Mr. Depp? 12 A Sure. He was promoting Lone Ranger, 13 and I had just met his kids at the premiere in 14 Los Angeles shortly before this tour started. 15 They found out about me – 16 Q Amber, I'm going to just ask you not to 17 go through that. 18 A Sure. 19 Q Just take us to Tokyo, please. 20 A So I believe we went from that stop to 21 Tokyo with the kids. And he had had difficulty 22 with drinking in front of them, he was trying to</p>
<p>4335</p> <p>1 A Yes. That was taken -- 2 Q Before you go further. Did you take 3 this picture? 4 A Yes, I did. 5 MS. BREDEHOFT: Your Honor, I would 6 like to move the admission of Defendant's 1095. 7 MS. VASQUEZ: No objection, Your Honor. 8 THE COURT: All right. 1095 in 9 evidence. You may publish. 10 Q Okay. Now, Amber, will you, please, 11 tell the jury where you took this and when you 12 took this. 13 A This was after a several-day bender, 14 you know, a binge of Johnny's. The 22nd of March, 15 which we talked about yesterday, about he tried to 16 burn a painting. He -- and was accusing me of 17 having affairs with a musician, my ex-partner. 18 And he was on these, like, you know, a drug binge, 19 where I saw him not -- not eating, little to no 20 sleep, and he would just use cocaine and drink all 21 day long. 22 Q Okay.</p>	<p>4337</p> <p>1 hide it, and, yes, he was dealing with some 2 stress, some stress around his career. I didn't 3 have a lot of details, but he was drinking at the 4 restaurant and the kids were kind of, you know, 5 noticing but not really sure what to make of it. 6 MS. VASQUEZ: Objection. Calls for 7 speculation and hearsay. 8 MS. BREDEHOFT: She didn't say what 9 they said. 10 THE COURT: I'll sustain as to the last 11 part of the answer. 12 Q Please continue, but don't say what 13 they said, okay, the kids said. 14 A Anyway, Johnny became upset with me for 15 judging him. He would -- he was, you know -- I 16 couldn't -- it was like I couldn't win. If I 17 didn't do anything, if I didn't say anything to 18 him about the drinking, if I didn't acknowledge 19 it, it got worse. If I did acknowledge it, it was 20 my fault, and I was nagging. I get it, you know, 21 I wouldn't like to be told what to do either, so, 22 but it made him really angry and the kids were on</p>

<p style="text-align: right;">4338</p> <p>1 this press tour, and I was just concerned about 2 them. I was concerned about them hearing us. 3 Johnny screamed at me in the hotel room, and all I 4 could think were the kids were in an adjoining 5 room. What if they could hear us? You know, I 6 had just met them, and I didn't want them to think 7 poorly of me and hate me, not knowing what was 8 going on, you know, in our -- behind closed doors. 9 I remember it was name-calling, and he eventually 10 passed out. 11 Q Do you recall what names he called you? 12 Do you recall what he said? 13 A I heard, this time, nagging bitch, 14 nagging bitch, all the time. Called me a cunt. 15 He even said that he made a mistake with me and 16 that when we touched back down, he'd get rid of me 17 and I'd go back to -- he said some disgusting 18 things to me. I don't know if I need to repeat 19 it. 20 Q Okay. 21 MS. BREDEHOFT: Michelle, can you bring 22 up Defendant's Exhibit 1090.</p>	<p style="text-align: right;">4340</p> <p>1 A Well, after -- you know, after this, I 2 was getting close to his kids and he had a stint 3 of sobriety shortly after that, and it felt really 4 good again. And shortly after that, he started 5 suggesting that I let him rent my apartment for 6 the vultures, that's what he called the press, and 7 he said now that we were, like, a known couple, 8 now that it was out in the press, that my 9 apartment wasn't, like, safe, effectively, for me. 10 You know, I had a modest apartment in Los Angeles. 11 And so, he started saying I needed to have 12 security on me or it would bring out the 13 neighboring -- the neighboring houses because of 14 the vultures. It was a conversation, and then 15 that conversation evolved into that I should move 16 in with him. You know, he always wanted me to go 17 with his security guards, wanted me to have his 18 credit card. Obviously, I wouldn't accept that. 19 But the conversation about moving in became, you 20 know, hard to resist because I was increasingly 21 becoming a part of his life. And, also, loving 22 his -- loving his family and feeling like, you</p>
<p style="text-align: right;">4339</p> <p>1 Q You indicated, I think, that he passed 2 out at the end of that. 3 Did you take this picture? 4 A I did. 5 MS. BREDEHOFT: Your Honor, I would 6 like to move the admission of Defendant's 7 Exhibit 1090. 8 MS. VASQUEZ: No objection, Your Honor, 9 thank you. 10 THE COURT: Okay. 1090 in evidence. 11 You can publish. 12 MS. BREDEHOFT: Thank you. 13 Q And where was Mr. Depp when you took 14 this picture? 15 A He was passed out with his head on the 16 table in the hotel room, in our hotel room, not 17 the kids' hotel room, in Tokyo, on that press 18 tour. 19 Q All right. I'm going to take you to 20 August 2013. What, if any, discussions did you 21 start having with Mr. Depp about moving in with 22 him?</p>	<p style="text-align: right;">4341</p> <p>1 know, more stability would mean more stability 2 with him and his struggles with drug and alcohol 3 abuse -- use. And I thought I would minimize some 4 of the jealousy and insecurity that he had. It 5 was hard for me to work, justify working. Every 6 audition, every meeting, every script I got was a 7 negotiation or a fight. I had to justify it, 8 like, as if I was saying, hey, let's have an open 9 relationship, you know. And I thought that would 10 be minimized if I could make him feel more secure 11 by, you know, if we lived together, certainly 12 there would be more security, right? And that was 13 my reasoning. 14 Q So you talked about filming and scripts 15 and things. What, if anything, did you do 16 differently in terms of pursuing your acting 17 career? 18 A Well, I've always -- I've always been 19 really -- I've always been really independent, you 20 know, and I never imagined not working. I've 21 worked from the earliest time I can imagine. I 22 come from, you know, parents who worked until they</p>

<p style="text-align: right;">4342</p> <p>1 literally couldn't anymore. I never, never 2 imagined myself having to explain my job or 3 justify my job. But I did, you know, and I am 4 independent and I see myself as independent and 5 strong-willed, and I had to bargain. Every time 6 I'd get a script, it would be, you know, I thought 7 you weren't taking another job? I'd always say, 8 are you kidding me? That's crazy. I have to 9 work. I'm supporting my family. When I moved out 10 to LA, I'd get a check for, you know, a gig, \$600 11 or something. I'd save half for me, send half to 12 my family. 13 You know, I kept having to justify 14 taking work by saying I'm supporting my parents, 15 you know, I'm supporting my sister, I'm supporting 16 my family. I have to work. And he would say, you 17 don't have to work, kid, let me take care of you. 18 My woman doesn't have to work. And that sounds 19 really sweet and really romantic in some way, but 20 it became a real fight. You know, every time I 21 got a script, it was what kind of -- you know, how 22 I was dressing, what kind of behavior I would</p>	<p style="text-align: right;">4344</p> <p>1 THE COURT: Overruled. 2 MS. BREDEHOFT: Thank you. 3 A Yes. 4 Q Let me ask you this: You have talked 5 about penthouse, we've heard a little bit about 6 penthouse apartments and Sweetzer. Could you just 7 explain to the jury the different places that 8 Mr. Depp had in Los Angeles and what they were 9 called, just so we have some context here when 10 you're going through all this? 11 A It's a little confusing, I imagine. He 12 had about, I think, four or five mansions in this 13 beautiful, like, you know, border of Beverly Hills 14 and West Hollywood, and they were all on a 15 cul-de-sac. And we called it "Sweetzer" because 16 that was the name of the street, and there are 17 five houses, I think five houses, it could be 18 four, all, you know, effectively, he had the whole 19 street. Then he had about five penthouses 20 downtown on the same floor of the Eastern Columbia 21 Building, which you've heard about, the ECB. And 22 Sweetzer was, you know, Johnny's kingdom. One of</p>
<p style="text-align: right;">4343</p> <p>1 have. Did I have a sex scene? And then I started 2 saying, no, I won't take the sex scenes or, you 3 know, I'll take the part where I don't play, you 4 know, that kind of character or -- then I started 5 minimizing the kind of kissing scenes that I had. 6 And eventually, I had to change the wardrobe that 7 I could have in the movie. I couldn't have a -- 8 couldn't have a sex scene. But that all was, you 9 know, it didn't happen all at once, of course. It 10 was little thing after a little thing after a 11 little thing. And eventually, I found myself 12 pushing as many scripts off my desk as I could, 13 picking one that had minimum makeup, dressed as 14 conservative as possible, finding ways to minimize 15 the scenes I had where I had a romantic 16 involvement of any kind. It was just -- it was a 17 constant battle and negotiation. 18 Q So let me take you back. 19 Did you -- as a result of your 20 discussions with Mr. Depp about moving in, did 21 there come a time that you did move in with him? 22 MS. VASQUEZ: Objection. Leading.</p>	<p style="text-align: right;">4345</p> <p>1 those houses was, like, a whole house was his man 2 cave, it was a studio, and it was where he did 3 music and hung out. And we spent some time in 4 there. But that was, effectively, Johnny's, you 5 know, place. 6 And then there was the downtown places. 7 And they were, effectively, empty, save for some 8 furniture and one of Johnny's friends, Isaac, who 9 you met, and he lived there, at some point, before 10 Johnny and I eventually decided to move in 11 together. 12 Q Let me just stop you there. I just 13 want to make sure we're clear. Are we talking 14 about the penthouses or are we talking about 15 Sweetzer? 16 A Isaac lived in the penthouses. The 17 rest of them were about -- pretty much empty. And 18 my best friend, who I was very, very, very, very 19 close to, went through a breakup and he very 20 kindly insisted on moving her into this penthouse. 21 And, of course, she said no for the first few 22 times, but he insisted and said they were empty</p>

<p style="text-align: right;">4346</p> <p>1 and he would love to have her move down there. 2 And he very kindly moved my best friend downtown. 3 Q Is that Rocky? 4 A Yes, Rocky Pennington. But the problem 5 is, it's, like, 30, 45 minutes from 6 West Hollywood, where my place was, which we 7 called "Orange" at the time. 8 Q Okay. So when did you move in to the 9 penthouses? 10 A Shortly after he moved Rocky, my best 11 friend, into the penthouse. So she was in one of 12 these emptyish apartments. And somewhere around 13 that time I -- I think it took me some time, 14 actually. But after that, I eventually agreed to 15 move in with him and give up my place. Although, 16 that made me pretty nervous, to be honest. But we 17 were in this relationship that was very serious 18 and we were constantly traveling, also was another 19 part of it. If we were in LA for a matter of days 20 or weeks, I'd go do a job, he'd go do a job, I'd 21 come back for a photo shoot or red carpet, go on a 22 location, go visit him on a location. There was</p>	<p style="text-align: right;">4348</p> <p>1 because I knew it was going to be an issue. But 2 Johnny dropped me off. He -- I gave him the 3 script. I sent him a picture of what I was 4 wearing, my wardrobe fittings, I sent him 5 everything. I shared his script -- my script with 6 his team. And the fighting eventually kind of 7 minimized. It was clear I was going to do this 8 job and I told myself I had to do this job. And 9 Johnny had to go to London, I think, for some 10 preproduction stuff for a movie he was going to do 11 a smaller part in, I think. It was called -- I 12 think this was Into the Woods, is my best guess. 13 So he dropped me off in London. And when he 14 dropped me off in London, we had a few days at 15 this hotel that we first, like, consummated our 16 relationship in. You know, it was when we were on 17 the London press tour and our relationship 18 developed; that was the same hotel, we were in the 19 same room, which was -- Johnny liked to be in the 20 same room. And it was really sweet. He got down 21 on one knee and said, "I want you to be my girl, 22 be my girl forever, my woman, my girl. I want you</p>
<p style="text-align: right;">4347</p> <p>1 an incredible amount of travel movement, so we 2 weren't living, again, living the day-to-day that 3 you might normally with a partner, you know, where 4 you have a home and you move in together and you 5 have one home. We didn't have that, it was -- 6 Q Okay. 7 A -- very difficult. 8 Q I'm going to take you to September of 9 2013. 10 What were you filming at that time? 11 London Fields? 12 A Yes, that's right. 13 Q Okay. 14 A I was filming London Fields. I'd just 15 started. 16 Q Did there become a time when you became 17 engaged to Mr. Depp? 18 A Well, yeah, it was difficult because 19 that role was, like, a very difficult role. I 20 mean, every time -- every scene that involved 21 sexuality or romance was, like, I'd look at that 22 on the page and, you know, I'd feel my gut tighten</p>	<p style="text-align: right;">4349</p> <p>1 to be the rest of my life. Say yes to me." 2 He said he wanted to spend every -- 3 every day -- he promised me that every day, when I 4 woke up, that I would wake up and he would make me 5 smile, at least once, and that would be his goal. 6 And, you know, I looked into his eyes and I saw my 7 future, hope, you know, like blind hope, so in 8 love. So it was one of the most -- I can't 9 describe that kind of joy, you know. I thought, 10 you know, if we were married, then this is real. 11 This is real. This isn't a thing of -- this isn't 12 chaotic. This will change. You know, I had so 13 much hope in that moment. And I just said to him, 14 over and over again, "Are you serious? Are you 15 serious? Are you sure," because he didn't have a 16 ring. So I just thought, was this an impulse 17 thing? You know, my experience, Johnny could be 18 very impulsive. And he said, over and over again, 19 be my -- "Be my woman forever. I want you to be 20 my wife, my wife, my wife." 21 I, of course, cried and we had a 22 wonderful evening, and I still -- he left shortly</p>

<p style="text-align: right;">4350</p> <p>1 after and I was -- like, the next day, I had to go 2 to work, and I was just -- I couldn't tell anyone 3 and I wasn't sure -- part of me was worried that 4 he didn't mean it, or, you know, that he wasn't 5 sure. I just didn't want it to be an impulse 6 thing. So I didn't want to mention it. I didn't 7 want to bring it up. I didn't want to -- and I 8 kind of felt -- I walked around for a few days, 9 like, I had butterflies under my skin. And then 10 my -- he brought my dad out to London with my best 11 friends, and my dad told me "You know, Johnny has 12 asked me permission for your hand in marriage." 13 And I felt like the luckiest woman in 14 the world. 15 Q So while you were filming London Fields 16 and Johnny had gone back to LA, what, if any, 17 issues did you have with him on fraternizing with 18 cast? I'm going to ask -- 19 MS. BREDEHOFT: Michelle, can you pull 20 up Defendant's Exhibit 188, please. 21 MS. VASQUEZ: Your Honor, I'm going to 22 object on hearsay.</p>	<p style="text-align: right;">4352</p> <p>1 already knew I couldn't, like, be photographed. 2 Even if it was platonic, I couldn't be 3 photographed with men or women that other people 4 could possibly spin as romantic. I learned that 5 in January, the hard way. So I asked him 6 permission, if I could go to this concert with the 7 cast, and I, you know, I said, you know, Johnny, 8 like, my co-star. 9 MS. VASQUEZ: Objection, Your Honor. 10 Hearsay. 11 Q Don't tell us what the co-star said. 12 Just tell us what your communication was with 13 Mr. Depp? 14 MS. VASQUEZ: Objection. Hearsay. Her 15 communications are hearsay. 16 THE COURT: I'll sustain the objection. 17 MS. BREDEHOFT: I'm not sure I 18 understand. 19 THE COURT: If you want to approach, 20 that's fine. 21 MS. BREDEHOFT: Yes. 22 (Sidebar.)</p>
<p style="text-align: right;">4351</p> <p>1 MS. BREDEHOFT: Your Honor, I'm going 2 to -- let's pull up 188A. I've redacted 3 everything but what Mr. Depp says. 4 THE COURT: Okay. Let me just take a 5 look at 188A. 6 MS. BREDEHOFT: That's admission 7 against interest. Do you have that? You don't 8 have it? Give that a minute. 9 Q While they're working on that, can you 10 tell us what transpired between you and Mr. Depp 11 when you wanted to do something with a cast 12 member? 13 A So, as I said, he came to London for 14 his own work and, also, dropped me -- he dropped 15 me off in London, where I had to be for a few 16 months to film this movie. And he asked me to 17 marry him. He brought my best friends and my dad 18 out. They left. And shortly after they left, my 19 co-star, one of my co-stars, invited me to go to a 20 concert with him and some of the cast to kind of 21 break the ice, I'd be working with them for the 22 next few months. And I had already, you know, I</p>	<p style="text-align: right;">4353</p> <p>1 MS. VASQUEZ: She's going to talk about 2 what she said and asking for permission. That's 3 hearsay. 4 MS. BREDEHOFT: She's on the stand. 5 It's not an out-of-court statement. 6 THE COURT: She's testifying to an 7 out-of-court statement. 8 MS. VASQUEZ: Correct. 9 MS. BREDEHOFT: She's on the stand. 10 That's not hearsay, Your Honor, what she 11 communicated. 12 THE COURT: What she said out of court 13 could be considered hearsay. But just -- but I'm 14 not sure what the statement is that's coming in or 15 what she's going to say. 16 MS. VASQUEZ: She asked for permission 17 to go to -- she asked Mr. Depp for permission. 18 You know, she wants to be able to go to a concert 19 with her co-star. 20 THE COURT: That's not going to be in 21 evidence. What's the next one coming in? What's 22 she about to testify to? I don't know.</p>

<p>4354</p> <p>1 MS. BREDEHOFT: Her communication with 2 Mr. Depp and Mr. Depp tell her he doesn't want her 3 to go. 4 MS. VASQUEZ: Well, Mr. Depp's 5 statement is not hearsay, but her communication 6 saying she's asking for permission, that's an 7 out-of-court statement. 8 MS. BREDEHOFT: She's on the stand, 9 Your Honor. That's not hearsay. She can ask 10 about it. She's subject to cross-examination. 11 THE COURT: Yeah, she is subject to 12 cross-examination, but even what she said out of 13 court could be considered hearsay. I'll take them 14 one at a time. That's already in evidence, that's 15 fine. And then we can get into whatever Mr. Depp 16 said, it's fine. But these conversations back and 17 forth, some of them are going to come in for 18 context purposes. 19 MS. VASQUEZ: I understand that. 20 THE COURT: So, we're just going to 21 have to do them one at a time. 22 MS. VASQUEZ: Thank you, Your Honor.</p>	<p>4356</p> <p>1 more from me, and that I probably wanted more, 2 too. You know, I was basically asking for it. 3 You're going to go backstage. What are you going 4 to say to the band? I know how this plays out. 5 Who is the other girl that's going to be there? 6 How could you be so stupid? How could you be so 7 foolish? You're more -- you should be smarter 8 than this. 9 And I apologized. That whole evening, 10 I think for hours, I spent on the phone with him, 11 texting, calling, we're talking, hanging up, he'd 12 hang up on me, be upset, and then send me cryptic 13 messages about my foolishness. And, you know, I'm 14 already doing a movie where I play this, you know, 15 character when I -- you know, where I was -- like 16 I read the script and I thought this character was 17 empowered sexually. By the time I got Johnny's 18 feedback on it, I had been convinced that, 19 actually, I was just being used. That I was just 20 being used. It was clear that that was all I had 21 to offer, and I was too foolish to see it. 22 Q Amber, I'm just going to stop you right</p>
<p>4355</p> <p>1 MS. BREDEHOFT: Okay. 2 (Open court.) 3 BY MS. BREDEHOFT: 4 Q So please tell us what Mr. Depp said. 5 A He said, effectively, no; that if I 6 accepted the invitation and went out to a concert, 7 that the engagement would be off, that the 8 relationship would be off. And that I was 9 foolish, naive for thinking that people could 10 invite me to a concert in a platonic way. I tried 11 to say that if -- 12 MS. VASQUEZ: Objection. Hearsay. 13 MS. BREDEHOFT: She's testifying about 14 what Mr. Depp said. I don't understand. 15 THE COURT: All right. I'll overrule 16 that objection. 17 Q Please continue. 18 A He said I was foolish and naive, that 19 no one could invite me to -- how could I be so 20 dumb to think that somebody could just invite me 21 to a concert. Why would they want to hang out 22 with me? Obviously, it was because they wanted</p>	<p>4357</p> <p>1 there because I would like you to take a look at 2 Defendant's Exhibit 188A. 3 A Uh-huh. 4 Q Is that in front of you? 5 Do you recognize this portion of the 6 text chain between you and Mr. Depp? 7 A Yes, I do. 8 Q Okay. And this is on September 9, 9 2013? 10 A Yes, it is. 11 Q Okay. And are these statements 12 Mr. Depp made to you during that evening that you 13 just described to the jury? 14 A Yes. 15 MS. BREDEHOFT: Your Honor, I'm going 16 to move the admission of Defendant's 188A. 17 THE COURT: Any objection? 18 MS. VASQUEZ: No objection. 19 THE COURT: 188A in evidence as 20 redacted. 21 Do I have that redaction or is that 22 something you need to give me?</p>

<p style="text-align: right;">4358</p> <p>1 MS. BREDEHOFT: I think we're going to 2 need to give it to you in hard copy. Thank you, 3 Your Honor. 4 THE COURT: You can publish it. 5 Q And if I can draw your attention to it, 6 he first says, "I don't want to make anything an 7 issue, baby, but I've literally been on the ground 8 just 14 fucking hours from leaving your side." 9 Do you see that? 10 A Yes. 11 Q And then he says, "You know what I 12 want, who I am and where I want to go with us. 13 You know very well what type of fucking man I am 14 and yet you lay a gauntlet before me that you know 15 is the very species of danger that will always 16 attract me into a very tempting test. What's 17 behind that door? Almost impossible to" -- he 18 meant not take you on. 19 "Do you want me to roll the dice? This 20 sounds more like an aggravated ultimatum than soft 21 words that can help us make both feel better. 22 Don't test me, please."</p>	<p style="text-align: right;">4360</p> <p>1 it was a smaller role, in Into the Words and then 2 he was filming Mortdecai after that. So after I 3 finished my movie, I moved in with him, into his 4 house in London, a rented house in London. 5 Q Okay. And describe your experiences 6 during that time period, with Mr. Depp. 7 A It was -- it was really touch and go. 8 He was filming with Paul Bettany, and there were 9 days when he wouldn't come home or they couldn't 10 get him up out of -- on set. He'd be asleep in 11 his trailer, sleeping whatever he'd done the night 12 before off. I remember he missed a few days of 13 work that way. It struck me because, in my 14 experience, in our job, you don't miss work. It 15 doesn't matter how sick you are. You go. You 16 know, it's millions of dollars every single day 17 they're filming. And I had not experienced 18 someone who could, effectively, just control the 19 set like that, I mean, to that extent. And one 20 day he didn't come home, and I was worried sick. 21 I found out that he was in a hotel room with Paul 22 Bettany.</p>
<p style="text-align: right;">4359</p> <p>1 Did he tell you that? 2 A Yes, he did. 3 Q What did you understand that to mean? 4 A It was clear. It was a threat. A 5 threat that if I wanted to be -- 6 MS. VASQUEZ: Objection. Speculation. 7 MS. BREDEHOFT: I think she can say 8 what she understood it to mean. 9 THE COURT: I'll sustain the objection. 10 MS. BREDEHOFT: All right. 11 Q Let's move on, then, to the filming of 12 Mortdecai with Mr. Bettany in 13 October/November 2013. 14 Where did that take place? 15 A In London. 16 Q Okay. What, if any, involvement did 17 you have? Were you there for any part of that 18 filming? 19 A Part of it. I happened to be in London 20 already, for the film I was just telling you 21 about, and Johnny came to London shortly after to 22 film his own movies. He did the smaller, I think</p>	<p style="text-align: right;">4361</p> <p>1 MS. VASQUEZ: Objection. Hearsay. 2 A Okay. 3 Q Move forward. 4 A When he was sent home, they had to 5 carry him home. 6 MS. VASQUEZ: Objection. Hearsay. 7 Q Did you see this? 8 A I watched it. 9 THE COURT: Go ahead. 10 Q Okay. Please continue. 11 A I watched -- actually, I was shocked 12 that he could do it. One of the security guards 13 carried, carried Johnny, like a baby, into the 14 house. And I looked at that and I -- I mean, his 15 boots were hanging over the security guard's arm, 16 who had to negotiate getting through the doorway 17 carrying Johnny like this. And I thought, I 18 watched this, his assistants and the other 19 security guards shaking their head, you know, just 20 shaking their head, acknowledging this -- how bad 21 it is. And I remember thinking, this has got to 22 be it. Like, this has got to change. This is</p>

4362	<p>1 surely -- this is it.</p> <p>2 And he was, understandably, very, very</p> <p>3 sick for at least two days, is my recollection.</p> <p>4 And in that two days, I had a lot of conversations</p> <p>5 with his team, I won't say what they were. But I</p> <p>6 felt, at that juncture, very encouraged that</p> <p>7 everybody and myself were on the same page. And I</p> <p>8 felt encouraged that we were in a new chapter.</p> <p>9 That Johnny had finally hit rock bottom and</p> <p>10 finally he felt like changing for good. And I</p> <p>11 felt really, you know, supported by these</p> <p>12 conversations I was having with people that he was</p> <p>13 close to, that he trusted.</p> <p>14 Q November 2013, did you have any contact</p> <p>15 with Lily-Rose that led to any discussions with</p> <p>16 Mr. Depp?</p> <p>17 MS. VASQUEZ: Objection. Leading.</p> <p>18 THE COURT: Sustained.</p> <p>19 Q What, if any, connection,</p> <p>20 communications, did you have with Lily-Rose in</p> <p>21 November 2013?</p> <p>22 MS. VASQUEZ: Objection. Calls for</p>	4364	<p>1 referring to?</p> <p>2 A Johnny's kids, Jack and Lily-Rose.</p> <p>3 Q All right. And was there a particular</p> <p>4 incident that led to disagreement with Mr. Depp?</p> <p>5 MS. VASQUEZ: Objection. Leading.</p> <p>6 THE COURT: Sustained.</p> <p>7 Q What, if any, interaction did you have</p> <p>8 with Lily-Rose that led to an argument with</p> <p>9 Mr. Depp?</p> <p>10 MS. VASQUEZ: Objection. Leading.</p> <p>11 MS. BREDEHOFT: What, if any.</p> <p>12 THE COURT: If you could approach.</p> <p>13 (Sidebar.)</p> <p>14 THE COURT: I understand what, if any,</p> <p>15 and I get that, but it's all the extra that you're</p> <p>16 putting in there. It's a little...</p> <p>17 MS. BREDEHOFT: I'm trying to give</p> <p>18 context to move along.</p> <p>19 THE COURT: I know. I understand that.</p> <p>20 I appreciate that. But I have to sustain the</p> <p>21 objection based on that, okay?</p> <p>22 MS. VASQUEZ: Thank you.</p>
4363	<p>1 hearsay. Leading.</p> <p>2 MS. BREDEHOFT: I'm asking what her</p> <p>3 connection was. I didn't ask what she said.</p> <p>4 THE COURT: I'm going to sustain the</p> <p>5 objection.</p> <p>6 If you want to move on.</p> <p>7 MS. BREDEHOFT: Okay.</p> <p>8 Q In November 2013, what, if any,</p> <p>9 interaction did you have with Lily-Rose, without</p> <p>10 saying anything she said?</p> <p>11 MS. VASQUEZ: Objection. Hearsay.</p> <p>12 MS. BREDEHOFT: It's interaction, Your</p> <p>13 Honor. I'm not asking for what she said.</p> <p>14 THE COURT: If you can lay a</p> <p>15 foundation.</p> <p>16 MS. BREDEHOFT: Okay.</p> <p>17 Q Did there come a time in November 2013</p> <p>18 that you saw Lily-Rose?</p> <p>19 A Yes. They came to stay with us for</p> <p>20 some time in the winter. Yeah, around November, I</p> <p>21 believe, 2013.</p> <p>22 Q When you said "they," who are you</p>	4365	<p>1 (Open court.)</p> <p>2 BY MS. BREDEHOFT:</p> <p>3 Q Did you have an argument with Mr. Depp</p> <p>4 relating to Lily-Rose in November 2013?</p> <p>5 A Yes.</p> <p>6 Q Can you please describe that?</p> <p>7 A Well, he -- I -- I didn't -- I was --</p> <p>8 I -- I was -- you know, these kids were -- I found</p> <p>9 them to be these beautiful, wildly intelligent</p> <p>10 little weirdoes, in the best way. You know, they</p> <p>11 were -- I was falling in love with them and, you</p> <p>12 know, they were in my life at that time, a short</p> <p>13 amount of time, but I loved it, and I felt -- I</p> <p>14 started to feel very protective and, you know,</p> <p>15 Johnny's sobriety meant that he was there and then</p> <p>16 he wasn't. The nature of our lives, with the</p> <p>17 travel and work, meant he was there and then he</p> <p>18 wasn't. And Lily-Rose, at some point, had a crush</p> <p>19 on a, you know --</p> <p>20 MS. VASQUEZ: Objection. Hearsay.</p> <p>21 Lack of foundation.</p> <p>22 THE COURT: I'll overrule.</p>

<p>1 MS. BREDEHOFT: Thank you. 2 Q Please continue. 3 A This argument happened because Johnny 4 was – I didn't agree that this gentleman, it was 5 a famous musician, over the age of 18, spent the 6 night at the house, and I felt protective over 7 Lily-Rose and concerned. And, naturally, they're 8 not – they were not my children. It's not my 9 place. And I understand that. I know it's a 10 sensitive subject. So I understand why Johnny got 11 so upset with me. But that and the introduction 12 of the weed with his daughter. She was so young. 13 I just felt protective. 14 Again, it's not my place, I understand 15 that. And I made him really angry by weighing in 16 on that. 17 Q Okay. Did there come a time that there 18 was a family engagement gathering? 19 A Well, we celebrated Thanksgiving out in 20 London, the kids were there. There was a stint of 21 sobriety following how sick he got on set with 22 Paul Bettany after one of his drug binges, and he</p>	<p>4366 1 all together for the holidays, and it went -- one 2 evening, we were going to his mother's house, his 3 mother, who you've heard about, was old -- older 4 and sick, but at home being cared for, and he -- 5 one evening, we're going to have dinner, Christmas 6 dinner there with her, around the time of her 7 birthday as well. And my best friend said -- 8 MS. VASQUEZ: Objection. Hearsay. 9 A Other. 10 MS. BREDEHOFT: It wasn't put for the 11 truth of the matter. 12 Q But go ahead. Go past that. 13 What did you do? 14 A We went to Betty Sue's house, his 15 mother's house, and Johnny proposed in front of 16 our families in this big, you know, he surprised 17 me, got down on one knee, and, you know, I cried 18 and hugged my mother and hugged his mother, and he 19 gave me this enormous diamond ring. And it was a 20 nice time. 21 Q Okay. I'm going to take you into 22 January, February, 2014. You had as -- you</p>
<p>4367 1 kind of just came alive again. He even, like, 2 played a prank on me about having, like, relapsed 3 when he hadn't relapsed. I started to kind of 4 feel that with the kids being around. I kind of 5 thought -- I did think that maybe this was it. We 6 were on a good path, meaning to sobriety. That 7 this was it. And our life was peaceful for a 8 minute. You know, it was -- it went back to being 9 wonderful. There were these moments that it just 10 felt so wonderful. 11 MS. VASQUEZ: Objection, Your Honor. 12 Nonresponsive. 13 THE COURT: All right. I'll sustain 14 the objection. 15 MS. BREDEHOFT: Okay. 16 Q Take us to the engagement. There was 17 this engagement party, correct? 18 A Then, yes, come Christmas of 2013, 19 Johnny had rented this beautiful mansion in Malibu 20 on the beach. It was gorgeous. And he brought my 21 family out and his family was out, obviously, in 22 LA, and we stayed in this rented mansion and we're</p>	<p>4368 1 employed a woman named Kate James; is that 2 correct? 3 MS. VASQUEZ: Objection. Leading. 4 Q What, if any, relationship did you have 5 with Kate James? 6 A She was my assistant at the time. I 7 hired her sometime in 2012 and had as minimal 8 contact with her as I possibly could. 9 Q And why is that? 10 A She was difficult, troubled, and 11 inconsistent. She drank on the job and stuff like 12 that. Her behavior was -- 13 MS. VASQUEZ: Objection. Relevance. 14 A -- horrible. 15 MS. BREDEHOFT: She's already 16 testified. Kate James has testified. I think 17 biased -- 18 THE COURT: All right. I'll allow 19 that. 20 Go ahead. 21 MS. BREDEHOFT: Thank you. 22 Q Okay. Please describe for the jury</p>

4370	1 what your -- what job responsibilities Kate had 2 and how you communicated with her and kind of how 3 that worked. 4 MS. VASQUEZ: Objection. Compound. 5 THE COURT: Overrule. 6 MS. BREDEHOFT: Thank you. 7 A Minimal person-to-person interaction 8 because I was hardly ever in LA. If I was, I was 9 there for a few days at a time, and Johnny and I 10 kind of lived in this interior bubble, anyway, 11 when we were together. But we would send emails, 12 texts, and voice -- a lot of voice memos, voice 13 notes. And I found that if I said, Kate, you 14 know, you left the car running with your doors 15 open and your kids in the car on the street. 16 MS. VASQUEZ: Objection. Hearsay. 17 MS. BREDEHOFT: She's not testifying -- 18 she's testifying about context. 19 THE COURT: I'll sustain the objection. 20 Next question. 21 MS. BREDEHOFT: All right. 22 Q I'm going to ask you to take a look at	4372	1 MS. BREDEHOFT: Your Honor, I'm going 2 to move the admission of Defendant's Exhibit 209. 3 Business records exception. 4 MS. VASQUEZ: Still hearsay, Your 5 Honor. 6 THE COURT: The business record 7 exception gets the business record in, but if 8 there's hearsay involved inside the business 9 record, there's still objection to hearsay. 10 MS. BREDEHOFT: Your Honor, the 11 business records exception, I mean, I don't -- I 12 don't agree. I think that's the point -- 13 THE COURT: If you want to approach. 14 (Sidebar.) 15 THE COURT: Business records 16 exception -- number one, I'm not sure emails are 17 business records. Number two, even if you get 18 business records in, they come in, but if there's 19 hearsay in those business records, that hearsay 20 doesn't come in. 21 MS. BREDEHOFT: Your Honor -- 22 THE COURT: But if you want to show me
4371	1 Defendant's Exhibit 209. 2 MS. VASQUEZ: Your Honor, I'm going to 3 object on hearsay grounds. 4 THE COURT: All right. 5 MS. BREDEHOFT: I'm going to lay a 6 foundation, Your Honor. 7 MS. VASQUEZ: It's still hearsay. May 8 we approach? 9 MS. BREDEHOFT: May I lay the 10 foundation first? 11 THE COURT: Go ahead. Yes. 12 Q Ms. Heard, did you communicate with 13 Kate James by email in the ordinary course of your 14 business? 15 A Yes, I did. 16 Q Okay. And I'm going to ask you to take 17 a look at Defendant's 209. 18 Is this a communication that was 19 between you and Kate James that was in the 20 ordinary course of business with her as an 21 employee? 22 A Yes, it is.	4373	1 something different that says hearsay in every 2 business record comes in, please, show that to me. 3 MS. BREDEHOFT: The exception, one of 4 the exceptions to the hearsay rule is the business 5 records exception. And records of regularly 6 conducted activity. And it says -- I'm on 7 2:803(6)(A), the record was made at or near the 8 time of the acts, events, calculations or 9 conditions. 10 B, the record was made and kept in the 11 course of a regularly conducted activity of a 12 business, organization, occupation -- 13 THE COURT: Keeping the record with a 14 regular practice of that activity. This is an 15 email. That's why it doesn't fit with the 16 business record. 17 MS. BREDEHOFT: That's how she 18 communicated with her. She was her employee. 19 THE COURT: For custodian. Business 20 records are made for custodian. Invoices, 21 accounting, not people's hearsay emails back and 22 forth. Neither the source of information nor the

<p>1 method or circumstances of preparation indicate a 2 lack of trustworthiness. 3 MS. BREDEHOFT: Why would this not 4 be -- 5 THE COURT: It's not a business record. 6 Sustain the objection. 7 MS. VASQUEZ: Thank you, Your Honor. 8 (Open court.) 9 BY MS. BREDEHOFT: 10 Q What, if any, communications did you 11 have with Kate James about your issues with 12 Mr. Depp? 13 MS. VASQUEZ: Objection. Hearsay. 14 MS. BREDEHOFT: Your Honor, Ms. James 15 has testified. 16 THE COURT: I'll sustain the objection. 17 MS. BREDEHOFT: All right. We can take 18 that down, Michelle. 19 Q In the February -- I'm going to jump to 20 February/March 2016. What, if any, communications 21 did you have with Mr. Depp about a pre-nup? 22 A Well, after the -- after the</p>	<p>4374</p>	<p>1 you sure? Maybe we should do this. And he -- one 2 time, he said to me, he was, like, kid, are you 3 already thinking of how you're getting out of 4 this? Are you already planning on getting out of 5 this, kid? You're already planning on leaving? 6 It was -- that was the same -- it was 7 around the same time as the moving in together 8 conversation. It was -- he accused me of having 9 one foot out. And they kind of were happening 10 around the same time. You know, I still had my 11 apartment and we're engaged now. He was asking me 12 to redecorate Sweetzer, his main house, and kind 13 of move in to the ECB building downtown, where my 14 best friend was living at this time, while the 15 decorations and the remodeling had been done on 16 Sweetzer. So these conversations were kind of 17 happening about how to build our future together 18 and how we were going to move forward together. 19 And I -- you know, I would have 20 forgotten about the extent that we had those 21 conversations early on in the engagement if it 22 hadn't been for my therapist's notes.</p>	<p>4376</p>
<p>1 engagement, but before the engagement party, I 2 started to -- I started to feel like it would 3 make -- you know, I know that he earned 4 significantly more than me, successful actor. I 5 wanted to eliminate any doubt in his mind and in 6 other people's mind. So I brought it up to him 7 and brought it up to my therapist. 8 MS. VASQUEZ: Objection. Hearsay. 9 MS. BREDEHOFT: She's just saying that 10 she brought it up to her therapist. She's not 11 saying what she said. 12 Q But, please, focus on Mr. Depp, okay? 13 A Of course. Johnny said he would tear 14 it up if I -- he said if you ever brought one up 15 to me or if I ever saw one, got my hands on it, 16 I'd tear it up. The only way out of this is 17 death. The only way out of this is death. 18 And I -- I thought it -- I thought it 19 would, like -- I didn't care either way, but I did 20 feel that it would eliminate suspicion or doubt 21 and it would make things easier. And I told him 22 over and over again, you know, are you sure? Are</p>	<p>4375</p>	<p>1 Q I'm sorry, if it hadn't been for what? 2 A If it hadn't been for my therapist's 3 notes, taken at the time when I was talking with 4 her about this and my conversations with her. 5 MS. VASQUEZ: Objection. Hearsay. 6 THE COURT: I'll sustain the objection. 7 MS. BREDEHOFT: We'll move on. 8 THE COURT: Okay. 9 Q Let's take it to March of 2014. 10 Did there come a time there was an 11 engagement party? 12 A Yes, so -- yeah, it was March 2014. 13 Q Please describe for the jury. 14 A We had an engagement party and we 15 decided that when we did get married, we'd have a 16 small wedding, you know, something intimate. But, 17 you know, our lives were kind of big. His life 18 was extremely big. And we needed to 19 incorporate -- we wanted to have a bigger 20 engagement party than a wedding, you know, and 21 kind of get our guests in, our family, our 22 friends, and have a big -- a big event of it as</p>	<p>4377</p>

4378	1 opposed to making the wedding something that was 2 big. And, you know, so we kind of put it on the 3 engagement party and had a bunch of people, a lot 4 of friends, business acquaintances, a lot of 5 family. I had all of my family friends and my 6 childhood friends come out for it. I even invited 7 my therapist. It was, you know, a big event. 8 Q Okay. And describe what took place at 9 the engagement party. 10 A Well, we walk in together and we took 11 some pictures and said a few hellos and then 12 Johnny disappeared upstairs in -- I guess it's, 13 like, a coat room or something. It's in a big, 14 abandoned building that was rented out for events. 15 And he disappeared upstairs, almost the entire 16 party, I would say. He kind of came down at the 17 end when we were leaving and came down once 18 because he was, at the time, sharing drugs with my 19 dad. 20 MS. VASQUEZ: Objection. Speculation. 21 Lack of foundation. 22 THE COURT: Lay the foundation.	4380	1 But, he still stayed upstairs and -- 2 Q Are you referring to Mr. Depp? 3 A Yes, I am. 4 Q Okay. Please continue. 5 A And so, shortly after that, I tried to 6 get Johnny to come downstairs, and he just snapped 7 at me, just verbally. Told me to shut the fuck 8 up. And I remember talking to my mom about the 9 irony of it. 10 Q Okay. 11 A We were at an engagement party. But 12 that was a pretty -- that was pretty much it for 13 the engagement party. And I went downstairs and 14 entertained guests and smiled and took pictures 15 and put on a face and, you know, went about my 16 evening. 17 Q All right. Take you to May 2014, the 18 Met Gala. 19 Can you, please, tell the jury what the 20 Met Gala is and what's involved in that? 21 MS. VASQUEZ: Objection. Compound. 22 THE COURT: Overruled.
4379	1 Q How do you know he was sharing drugs 2 with your dad? 3 A I was there. I watched it. 4 Q Please continue. 5 A My dad, at the time, was on the same -- 6 was addicted to the same thing Johnny was, and, 7 so, my dad had -- either my dad ran out or Johnny 8 ran out, but there was a -- you know, they needed 9 more, of course, and had to leave the party -- my 10 dad actually left with Johnny's security to go get 11 more drugs from -- 12 MS. VASQUEZ: Objection. Calls for 13 speculation. 14 Q How do you know that? 15 A They told me. 16 MS. VASQUEZ: Hearsay. 17 THE COURT: I'll sustain the objection. 18 MS. BREDEHOFT: Okay. 19 A And they left to go whatever, and they 20 came back with drugs and everything was okay, in 21 terms of the withdrawal symptoms. I don't know 22 what you call it at that point.	4381	1 A Met Gala is a big event, annual event, 2 celebrity event in New York. It's a fashion 3 event, but it's a just a major red carpet event. 4 And you have to be invited and it's kind of a 5 thing. 6 And we were invited that year, and I -- 7 I had already gone for the previous year, too, and 8 this year we were going to go together. And at 9 some point, in the evening, we're sitting across 10 the table and Johnny starts asking me about this 11 woman, he thought I was looking at this woman in a 12 sexual way. And I kind of turned it around on him 13 and said -- 14 MS. VASQUEZ: Objection. Hearsay. 15 THE COURT: All right. 16 MS. BREDEHOFT: It's context, Your 17 Honor. This is context. 18 THE COURT: I'll sustain the objection. 19 MS. BREDEHOFT: Okay. 20 Q Just say what Mr. Depp said, then. I 21 guess you can't tell us what you said to him. 22 A Okay. He was accusing me of flirting,

4382	<p>1 and that's how the argument started. I don't 2 recall what other accusations I was fielding at 3 that moment, but, typically, in my experience with 4 him, it wasn't just one. He would make a point 5 and then he would go on to a different accusation. 6 But I remember what started it is this 7 accusation that I had been flirting at this event. 8 We get back to the hotel room, and 9 Johnny shoves me and kind of grabs me by the 10 collarbone area, not really my neck, but top of my 11 neck – top of my – above my collarbone, below my 12 neck. 13 I think, at that point, when we were 14 still in the living room, I shoved him back. But 15 I can't – I don't really recall too many 16 specifics. I remember he threw a bottle at me. 17 It missed me but it broke the chandelier. And, at 18 some point, I remember, maybe this was the shove 19 that I was talking about, but at some point, 20 Johnny and I are in a struggle in the living room, 21 and he kind of, like, shoves me down on the sofa; 22 I get up and I'm trying to get him off of me.</p>	4384	<p>1 Diaries? 2 A I believe May. I filmed another movie 3 in New York, March, April -- April, May, I went 4 straight from that movie to another movie. An 5 independent film with James Franco. The one I had 6 previously shot was with Christopher Walken. 7 That's right. Okay. 8 So I went from one to the other, and 9 saw Johnny in these, you know, in between, like if 10 I got a long weekend or, you know, I'd fly home to 11 be with him and fly back. It was kind of like 12 that. 13 Q Fly back from where? Where were you 14 filming those? 15 A In New York. 16 Q Where was Mr. Depp at that time? 17 A Johnny was in LA, at the time, and then 18 eventually went on location for his movie, Black 19 Mass, in Boston. 20 Q So you were in New York and Mr. Depp 21 was in Boston, at some point? 22 A Eventually. By May, 2014. That's it.</p>
4383	<p>1 He's just stronger than me. I don't know how else 2 to describe it. At some point, he just whacks me 3 in the face. And I had not, at the time, been – 4 like, I didn't – I think that was the first time 5 I was, like, is this a broken nose? At the time, 6 I was unsure what that feeling was, but I 7 suspected I had a broken nose. And other than 8 that, I was relatively unscathed. But I remember 9 my nose being swollen, discolored, red, and I took 10 a picture of my face at some point. I made a joke 11 about it to my friend, about how bad I looked 12 compared to – 13 MS. VASQUEZ: Objection. Hearsay. 14 MS. BREDEHOFT: It wasn't offered to 15 prove the truth of the matter, Your Honor. 16 THE COURT: I'll sustain the objection. 17 MS. BREDEHOFT: Okay. 18 Q Just don't say what you told a friend, 19 okay? 20 A Okay. 21 Q Let's take you to The Adderall Diaries. 22 When did you start filming The Adderall</p>	4385	<p>1 Q What, if any, discussions or arguments 2 did you have with Mr. Depp relating to James 3 Franco in that time frame of May 2014? 4 A It's a nightmare. I wanted to do this 5 independent film. I liked the story, I liked the 6 character. I, you know, told him I'm not going to 7 wear makeup in the thing. 8 MS. VASQUEZ: Objection. Hearsay. 9 MS. BREDEHOFT: Apparently -- 10 THE COURT: Ms. Bredehoft, if we could 11 approach, please. 12 (Sidebar.) 13 THE COURT: I don't need those side 14 comments. 15 MS. BREDEHOFT: I apologize for that. 16 I'm just so baffled. I don't know why -- 17 THE COURT: If there's a prior 18 statement that she made, it's hearsay. Unless you 19 have an exception for it. Context is not an 20 exception. 21 MS. BREDEHOFT: State of mind. Present 22 tense --</p>

<p>1 THE COURT: No, those are not 2 exceptions for I wasn't going to wear makeup. 3 MS. BREDEHOFT: I mean, it's context as 4 well, Your Honor. 5 THE COURT: Context is not an 6 exception. 7 MS. BREDEHOFT: It's not offered for 8 the truth of the matter. 9 THE COURT: Then what's it offered for? 10 MS. BREDEHOFT: Offered to show -- 11 well, it doesn't matter whether she's wearing 12 makeup or not, Your Honor. That's not -- 13 THE COURT: Then it's not relevant. 14 MS. BREDEHOFT: But it's leading up to 15 the argument. It's still context, Your Honor. 16 THE COURT: Context -- Ms. Bredehoff, 17 prior statement is hearsay unless there's an 18 exception. Context is not an exception to that. 19 Or if it's not offered for the truth of the 20 matter, what is it offered for? 21 MS. BREDEHOFT: It's offered for 22 context.</p>	<p>4386</p>	<p>1 kissing scene, any sort of romantic scene, and I 2 wasn't explicit about what I was going to do, then 3 I was accused of having withheld information and 4 hiding it from him. 5 So I didn't want the fight, of course, 6 I didn't want the argument, but I had to kind of 7 eggshell, tip toe around how to tell him when I 8 had any sort of scene like that. And I did tell 9 him in this occasion -- 10 MS. VASQUEZ: Objection. Hearsay. 11 BY MS. BREDEHOFT: 12 Q We need to stay with what Mr. Depp 13 said, okay? 14 A Okay. So he was upset with me, but he 15 didn't sound coherent so much on the phone. He 16 was yelling at me about how could you? How could 17 you tell me this? How could you tell me this when 18 I'm filming, when I have this scene that I'm 19 doing? How could you tell me this when I'm 20 working? 21 Obviously, I couldn't tell him any 22 other time because we were both filming, and I</p>	<p>4388</p>
<p>1 THE COURT: That's not -- okay, I'll 2 sustain the objection. 3 MS. VASQUEZ: Thank you, Your Honor. 4 (Open court.) 5 BY MS. BREDEHOFT: 6 Q So, tell the jury what Mr. Depp said. 7 A He was mad at me for taking the job 8 with James Franco. He hated, he did, James 9 Franco, and was already accusing me of kind of 10 secretly having a thing with him in my past, since 11 we had done Pineapple Express together. 12 Q Okay. So I'm going to take you to the 13 Boston plane incident. We've heard about that 14 earlier, May 24. 15 Can you, please, describe, for the 16 jury, what took place on May 24, relating to the 17 plane incident? 18 A Well, I -- I had spoken to Johnny, you 19 know, he's in Boston, I'm in New York, and I spoke 20 to him. He had already been upset with me and 21 accused me in, like, many arguments about not 22 telling him about scenes that I had. If I had a</p>	<p>4387</p>	<p>1 told him as soon as it was relevant. But he kept 2 saying, how could you tell me this? How could you 3 just tell me this? 4 And it was like I had told him I was 5 having an affair or something. You know, he was 6 that angry at me. But he kind of started to sound 7 less connected to reality as these, like, 8 arguments would happen on the phone. This is in 9 one day. 10 Eventually, he hangs up on me in the 11 conversation, screaming. Screaming at me. I 12 talked to his assistants, I won't say what they 13 said, but I had conversations and felt encouraged 14 that I could continue on with the plan, which was 15 for me to get on the plane, go to Boston, pick him 16 up, and we would go back to LA for his daughter's 17 birthday. 18 I was nervous because of the 19 conversation I had had with him, and he was so 20 upset with me on that conversation. But I figured 21 he -- I assumed he had passed out and that he 22 would have been kind of sobered up the next day,</p>	<p>4389</p>

<p style="text-align: right;">4390</p> <p>1 assuming that the work would mean that he felt 2 pressured to kind of pull it together. And I get 3 on the plane, he sent the plane, so I assumed he's 4 not that mad at me. He's over it. We're moving 5 on. He sobered up. There had been a lot of talk 6 about a sober plan, like a full detox, a full 7 recovery, a doctor, the whole plan. You know, 8 there were talks of that following what had 9 happened in London. So I was feeling like, okay, 10 well, maybe we're here. I get on the plane. It 11 touches down and the SUV pulls up, and it sits on 12 the tarmac for a very long time. He knows I'm on 13 the plane waiting for him, so I kind of started to 14 anticipate that things weren't as I hoped, meaning 15 that he was sober and had slept it off. And I 16 get -- I mean, I'm sitting on the plane for a very 17 long time waiting for him and he finally opens the 18 door, and I see him get out of the SUV, and I can 19 guess, by how he's moving, how he's walking, I 20 didn't realize, at the time, I had already become 21 really sensitive to these little changes because 22 my life changed depending on what he was on. And</p>	<p style="text-align: right;">4392</p> <p>1 here. There was no me talking myself out of this 2 or talking him down or any -- you know, a lot of 3 my arguments and my involvement in them are me 4 trying to defuse by explaining -- 5 MS. VASQUEZ: Objection. 6 Nonresponsive. 7 MS. BREDEHOFT: She's telling the 8 story, Your Honor. 9 THE COURT: I'll sustain the objection 10 as to the last part. 11 Go ahead. 12 MS. BREDEHOFT: Okay. 13 A So he is asking me questions, and I 14 know not to engage. 15 I was polite. I made sure to answer 16 minimal amount of, you know, the minimal amount 17 that I could. I moved slowly. I was trying to be 18 polite but not engage because there was no win. 19 And he kept going. Kept asking me. Eventually, 20 it went from do you have something to tell me to 21 you want to tell me how much you liked it? Tell 22 me, did he slip a tongue? It got worse and worse.</p>
<p style="text-align: right;">4391</p> <p>1 he gets on the plane and I -- I just knew, in 2 every cell of my body, that something was wrong. 3 And he comes straight up to me, doesn't 4 say anything to me, but is looking at me. He's 5 got these glasses on and he takes them off in this 6 kind of aggressive manner and sits down across 7 from me, not in the usual spot. We kind of have 8 our places on his plane, you know, where you get 9 used to sitting. I remember I got up and moved to 10 accommodate him getting by so he could sit in the 11 normal seat, as per usual. He didn't. He sat 12 across from me. 13 At some point, I don't really remember 14 the exact sequence of it, we take off, at some 15 point he's asking me what's wrong with me? What 16 do I have? Do I have something to tell him? Do I 17 have something to tell him? Do you want to talk 18 to me about your day yesterday? And then it 19 gets -- I already know that he's drunk. I already 20 know he's using -- he reeks of weed and alcohol. 21 I mean, his breath smelled so bad and I could -- I 22 could anticipate that there was a no-win situation</p>	<p style="text-align: right;">4393</p> <p>1 Just more. It went from asking me about how my 2 kissing scene went or how the sex scene went to 3 asking me what James Franco had done in the scene 4 to being really explicit about my body. You know, 5 he was talking about my -- saying really 6 disgusting things about my body, about how I liked 7 it, how I responded. Then he started taunting, 8 just straight up taunting me. I know you liked 9 it. He called me a go-getter. He called me a 10 slut. Also, this is happening with security and 11 his assistants on the plane. And I remember I 12 felt -- I don't -- I struggle to be able to tell 13 you how embarrassed I was because he was speaking 14 to me in front of people in this way, asking me if 15 I liked it and if I was wet. And, you know, why I 16 wasn't looking at him. And that was proof, I 17 wasn't looking at him, that was proof that I was 18 asking for it. Did I ask James to do this and 19 this to me. And how about if he does those things 20 to me, insert sexually explicit descriptions of 21 what he accused me of wanting or deserving. And 22 I, at some point in this, get up and move to the</p>

<p style="text-align: right;">4394</p> <p>1 front of the plane. And I remember getting up so 2 slowly. I didn't want to aggravate him. I didn't 3 want to give him any excuse to pounce on. I 4 didn't want to upset him. I didn't want him to 5 flip a switch and get worse. I didn't want -- I 6 just remember very slow movements, and I slowly 7 get up and move to the front of the plane and he 8 starts throwing things at me. Ice cubes, 9 utensils. He was calling me a go-getter and then 10 an embarrassment. Talking about what an 11 embarrassment I am. I don't know how many times I 12 moved seats, I wish I did. I don't. I remember 13 moving more than once, and Johnny came to me each 14 time. Not the other way around. He sits down in 15 front of me, at one point, and because I'm not 16 answering him, I was looking out of the window, 17 and he slaps my face. And his friend is in our 18 proximity. And I -- it didn't hurt me. It didn't 19 hurt my face, I just felt embarrassed that he'd do 20 that to me in front of people. It was the first 21 time that anything like that had happened in front 22 of somebody.</p>	<p style="text-align: right;">4396</p> <p>1 just look at him one more time wanting to 2 penetrate the monster to see the man that I love 3 underneath that. The man I love. And he tells me 4 to hurry up again. And I pull my gaze away from 5 him. I walk away from him. My back is turned to 6 him. And I feel this boot in my back. He just 7 kicked me in the back. 8 I fell to the floor, I caught myself on 9 the floor. I just felt like I was looking at the 10 floor of the plane for, felt like, a long time. I 11 thought to myself, I don't know what to do. I 12 can't believe he just -- did he just kick me? No 13 one said anything. No one did anything. It was 14 like you could hear -- you could hear a pin drop 15 on that plane. You could feel the tension, but no 16 one did anything. And I just remember feeling so 17 embarrassed. I felt so embarrassed that he could 18 kick me to the ground in front of people. And 19 more embarrassing, I didn't know what to do about 20 it. I got up and I just -- I walked to the front 21 of the plane. I sat down, and I just looked out 22 of the window. Jerry Judge, the security, and my</p>
<p style="text-align: right;">4395</p> <p>1 I got up to move again and he's just 2 taunting me, having a laugh, screaming, and then 3 just straight up mean, calling me names. And it 4 was oscillating between those things. 5 And I get up, slowly again, and I just 6 resolve to just sit, the rest of the time, up at 7 the front of the plane. 8 And as I get up, he kind of kicks the 9 swivel chair into my hip, but kind of just hits 10 me. I look at him and he asks me, "What? What 11 are you going to do about it?" 12 I just stared at him. I just stared at 13 him and wanted him to see me. I wanted to get 14 through to him. Didn't feel there was, like -- it 15 felt like there was a blackness in his eyes. I 16 wanted to look at him. I wanted him to see me. 17 It didn't even feel like him. 18 And as I'm walking away, slowly, trying 19 not to be -- I was being very deliberate about my 20 movements, wasn't saying anything. I wasn't 21 engaging. I'm walking away from him slowly, and 22 he tells me, hurry the fuck up. Hurry up. And I</p>	<p style="text-align: right;">4397</p> <p>1 friend both kind of, under their breath, asked me, 2 are you okay? 3 MS. VASQUEZ: Objection. Hearsay. 4 A I spent a lot of time looking out of 5 the window. 6 THE COURT: I'll sustain the objection. 7 A And... 8 Q Did there come a time that you tape 9 recorded Mr. Depp on this plane? 10 A I want to sit here and say that I was, 11 like -- I was telling myself that I needed to 12 leave him, but as he got worse, he demanded the 13 oxygen tank from the flight attendant. The flight 14 attendant, excuse me, and he continued to drink 15 and then eventually started howling like an animal 16 and passed out in the bathroom, with the door 17 locked, and was howling. And I, at some point, 18 pushed record on my phone because there was that 19 5 percent part of me -- 20 MS. VASQUEZ: Objection. 21 Nonresponsive. 22 MS. BREDEHOFT: I don't think it's</p>

4398	1 nonresponsive. She's explaining to what led up to 2 her tape recording him and why. 3 I mean, I can ask her. 4 THE COURT: All right. 5 MS. BREDEHOFT: Okay. 6 Q Why did you tape record him? 7 A Because I knew that Johnny wouldn't 8 remember what he had done. I knew he would not 9 remember -- 10 MS. VASQUEZ: Calls for speculation. 11 MS. BREDEHOFT: But she can say why she 12 did it and what she thought. 13 THE COURT: But that last part called 14 for speculation. 15 Q You can say what -- why did you tape 16 record? 17 A In my experience, when Johnny was that 18 inebriated, he would not remember what he had 19 done. 20 MS. VASQUEZ: Calls for speculation. 21 MS. BREDEHOFT: How can that call for 22 speculation?	4400	1 The first two are him howling. But, Your Honor, 2 that doesn't -- I mean, she's authenticated that 3 she's made the recording. 4 THE COURT: Doesn't matter. Hearsay 5 can still be involved in tapes, too. So the other 6 people on there, you're trying to get their 7 statements in, that would be hearsay. 8 MS. BREDEHOFT: I'm not offering that. 9 THE COURT: Okay. 10 MS. BREDEHOFT: For the truth of the 11 matter. 12 THE COURT: What do they say? 13 MS. BREDEHOFT: He says he's going to 14 stay with this fucking idiot until he gets -- in 15 case he gets sick. But I'm not offering it for 16 that. I'm offering what's going on with the 17 howling. 18 THE COURT: I'm going to sustain as to 19 that statement. 20 MS. BREDEHOFT: Then the first two I'm 21 offering -- 22 THE COURT: The first two are just him
4399	1 THE COURT: I'll sustain the objection. 2 MS. BREDEHOFT: All right. 3 Let's go to Defendant's 221. 4 Q And I'm going to play three different 5 parts for it. 6 MS. VASQUEZ: Your Honor, may we 7 approach, please? 8 THE COURT: Okay. 9 (Sidebar.) 10 THE COURT: 221. 11 MS. VASQUEZ: So I anticipate this is 12 the Boston plane recording. 13 THE COURT: It seems like it, that's 14 where we are. 15 MS. VASQUEZ: Yeah, so there are other 16 voices on this recording besides Mr. Depp. 17 THE COURT: Okay. 18 MS. VASQUEZ: So I ask that those 19 voices -- 20 THE COURT: The clips you have aren't 21 with other people's voices, correct? 22 MS. BREDEHOFT: One of them is, yes.	4401	1 howling; is that right? Howling, is that what 2 we're talking about here? 3 MS. BREDEHOFT: Right. 4 THE COURT: So just him howling? And 5 there's no other sounds or just her? 6 MS. BREDEHOFT: No, I don't believe so. 7 Jerry Judge is just on the third. 8 THE COURT: So you're just going to do 9 the first two? 10 MS. VASQUEZ: That's fine, Your Honor. 11 THE COURT: So you're not going to get 12 the whole thing in. We're just going to call the 13 first one A and the second one B; is that okay? 14 So, A is going to be? 15 MS. BREDEHOFT: Zero to one minute. 16 THE COURT: Okay. B? 17 MS. BREDEHOFT: B will be 2:50 to 3:20. 18 THE COURT: And then, after we hear 19 these audios, why don't we wrap up for our morning 20 break; will that be okay? Okay. Thank you. 21 MS. VASQUEZ: Thank you, Your Honor. 22 (Open court.)

4402	1 BY MS. BREDEHOFT: 2 Q So we're going to start with 221 and 3 we're going to call it A, and that will be 0 4 through one minute. 5 MS. BREDEHOFT: Your Honor, may I 6 approach? 7 THE COURT: Okay. Sure. 8 (Sidebar.) 9 MS. BREDEHOFT: I think all three of 10 them have already been admitted into evidence and 11 were played during Mr. Depp's examination, 12 cross-examination. 13 THE COURT: Do you have any of the 14 audio? I don't remember the numbers, so you have 15 to tell me which numbers you think they are. 16 MS. BREDEHOFT: Yes. It's already been 17 played, Your Honor. It was played during 18 Mr. Depp's cross-examination. 19 THE COURT: Not the third one. Because 20 they said Jerry Judge is in the third one, and I 21 have not heard any recordings of other people. 22 MR. NADELHAFT: Remember during his --	4404	1 it, if you would like. 2 MS. BREDEHOFT: I think that would 3 torture the jury, if I did that, Your Honor. 4 9:30 to 10, just 30 seconds more. 5 (Whereupon, the following audio clip 6 was played.) 7 UNIDENTIFIED MALE: I'm going to stay 8 with this fucking idiot in case he gets sick. 9 THE COURT: All right. And you're 10 going to be changing gears after that, or do you 11 have any more questions for this issue? 12 MS. BREDEHOFT: No, I think this would 13 be fine for a break. 14 THE COURT: All right. Ladies and 15 gentlemen, let's go ahead and take our morning 16 break, then. Just do not do any outside research, 17 and don't discuss the case with anybody. 18 (Whereupon, the jury exited the 19 courtroom and the following proceedings took 20 place.) 21 THE COURT: All right. Thank you. 22 And, again, ma'am, since you're still
4403	1 we can check at the break. 2 THE COURT: Yeah, you can check. But 3 let's just do those two now. How about that? 4 MR. NADELHAFT: That's fine. 5 MS. BREDEHOFT: We're going to start 6 the first one with zero to 1 minute. And can you 7 turn up the volume? There's part of it, the noise 8 of the airplane is a little bit loud, to be able 9 to pick up the noise. 10 (Whereupon, the following audio clip 11 was played.) 12 MR. DEPP: (Moaning.) 13 MS. BREDEHOFT: And then the second one 14 is from 2:50 to 3:20, 30 seconds. 15 (Whereupon, the following audio clip 16 was played.) 17 MR. DEPP: (Moaning.) 18 THE COURT: 221 is in evidence. All of 19 221 is already in evidence? 20 MS. BREDEHOFT: So, may I play the 21 third one, then, and then we can take the break? 22 THE COURT: Yes. You can play all of	4405	1 testifying, don't discuss your testimony with 2 anybody at this point, okay? 3 All right. Let's just come back at -- 4 let's make it 11:42, all right? 5 MS. BREDEHOFT: Thank you, Your Honor. 6 THE BAILIFF: All rise. 7 (Recess taken from 11:26 a.m. to 8 11:42 a.m.) 9 THE BAILIFF: All rise. 10 Please be seated. 11 THE COURT: Are we ready for the jury? 12 MS. BREDEHOFT: No, may we approach? 13 THE COURT: Sure. 14 (Sidebar.) 15 MS. BREDEHOFT: Your Honor, I'm going 16 to have a series of text messages. 17 THE COURT: Okay. 18 MS. BREDEHOFT: Emails. So I thought I 19 would just head it off. 20 THE COURT: Sure. That's a great idea. 21 MS. BREDEHOFT: Looking at Rule 2:803. 22 THE COURT: Hearsay exception.

4406	1 MS. BREDEHOFT: It says the following 2 are not excluded by the hearsay rule -- 3 THE COURT: Right. 4 MS. BREDEHOFT: -- even though the 5 declarant is available. And we've got admission 6 by party-opponent. 7 THE COURT: Right. We've done that. 8 MS. BREDEHOFT: We have present sense 9 impression. 10 THE COURT: Right. I understand. I'm 11 very familiar. 12 MS. BREDEHOFT: I accept that, Your 13 Honor. But -- and business records is also in the 14 hearsay exception. I'm going to be putting a 15 number of them. And I'm going to be arguing, with 16 each of them, that it is present sense impression 17 and then existing state of mind. But I'm going to 18 put them in -- I need to put them in, even if Your 19 Honor rules against them. 20 THE COURT: Anything you identify is 21 part of the record. You can't put them into 22 evidence. It's part of the record.	4408	1 MS. BREDEHOFT: Yes, Your Honor. Thank 2 you. 3 THE COURT: Okay. 4 (Whereupon, the jury entered the 5 courtroom and the following proceedings took 6 place.) 7 THE COURT: All right. Thank you. All 8 right. Be seated. 9 Next question. 10 MS. BREDEHOFT: Thank you, Your Honor. 11 BY MS. BREDEHOFT: 12 Q Amber, following the plane ride, what 13 did you do once you arrived, once you landed in 14 LA? 15 A I called for a cab, a car to pick me 16 up, met me at the private airport, and I left. I 17 got straight off the plane as soon as we touched 18 down. Johnny had been saying some -- what he 19 would do to me once we got on the ground, and I 20 didn't know how long the cycle would last, so I 21 wanted to just get out of there. And I went to a 22 hotel and called my friends to join me, which was
4407	1 MS. BREDEHOFT: I understand. And I 2 fully appreciate and respect that Your Honor has 3 the right to rule however Your Honor wants to. 4 THE COURT: Yeah. 5 MS. BREDEHOFT: Just wanted to give you 6 a heads-up on that. 7 THE COURT: Okay. 8 MS. BREDEHOFT: These are my two -- 9 predominantly the two exceptions I'm relying on 10 with this series. And there are some that are 11 just spontaneous. Some of them are even almost -- 12 they're saying -- 13 THE COURT: I have to take them one at 14 a time. 15 MS. BREDEHOFT: I appreciate that, Your 16 Honor. I just kind of wanted to preview. 17 THE COURT: Thank you. 18 MS. VASQUEZ: Thank you, Your Honor. 19 MS. BREDEHOFT: Okay. 20 (Open court.) 21 THE COURT: All right. Are we ready 22 for the jury, then?	4409	1 my coping strategy at the time. 2 Q Okay. I'm going to ask you to take a 3 look at Defendant's 204. 4 MS. BREDEHOFT: If you can bring that 5 up. 6 Q Did you reach out to -- 7 MS. VASQUEZ: Objection, Your Honor. 8 Hearsay and leading. 9 MS. BREDEHOFT: Your Honor, I would 10 direct Your Honor's attention to the first one in 11 blue. 12 THE COURT: Okay. 13 MS. BREDEHOFT: And the third one in 14 blue. And I would say present sense impression 15 and the state, state of mind at that time. 16 THE COURT: All right. If you want to 17 approach. 18 MS. BREDEHOFT: Yes. 19 (Sidebar.) 20 THE COURT: All right. So, I'm going 21 to overrule as to present sense impression. 22 Again, it's past -- present sense impression has

4410	1 to be happening at the time. If she called from 2 the plane saying he's kicking me, for example. 3 MS. VASQUEZ: Overrule or sustain? 4 THE COURT: Sustain. I mean sustain. 5 He's kicking me -- sorry. Thank you. He's 6 kicking me. Those are present sense impressions. 7 MS. BREDEHOFT: Your Honor, "I need 8 your help. JD --" 9 THE COURT: Yeah, JD, he is passed out 10 on plane. 11 MS. VASQUEZ: But she says here, I'm 12 headed to -- 13 THE COURT: That's the one I'm talking 14 about. That one. So, I need your help. 15 MS. BREDEHOFT: Yes. I think that's 16 state of mind. That's mental state of mind, at 17 that point, Your Honor. 18 THE COURT: When are these texts? 19 MS. BREDEHOFT: This text is at 5:24, 20 and right before that -- 21 MS. VASQUEZ: She's already off the 22 plane, Your Honor. She said she's headed to AD.	4412	1 sustain the objection. Both of those, okay? 2 MS. VASQUEZ: Thank you, Your Honor. 3 THE COURT: Thank you. 4 (Open court.) 5 MS. BREDEHOFT: All right. Let's go to 6 205. Defendant's 205. 7 BY MS. BREDEHOFT: 8 Q And this is a communication between you 9 and Rocky Pennington, your best friend; is that 10 correct? 11 A That's correct. 12 MS. VASQUEZ: Objection. Hearsay. 13 THE COURT: All right. Do you want to 14 approach? 15 (Sidebar.) 16 THE COURT: All right. Do you want to 17 make your responses for the record? 18 MS. BREDEHOFT: Yes, Your Honor. The 19 "I'm not good" is clearly state of mind. Mental 20 condition at that point. 21 "JD is drinking again and using some 22 new round of prescription meds. He just freaked
4411	1 AD is one of Mr. Depp's residences, Sweetzer. 2 MS. BREDEHOFT: Your Honor, the cases 3 that we cited, even on the excited utterance and 4 the present sense, it says it doesn't have to be 5 immediate, it can be after. Clearly, it's state 6 of mind. 7 THE COURT: Well, the cases that you 8 have, she had already been assaulted and then she 9 was calling and giving a license plate number. 10 MS. BREDEHOFT: That's one of them, 11 that's correct. 12 THE COURT: She's already off the 13 plane. She testified that on the plane, she was 14 sitting, looking out the window. 15 MS. BREDEHOFT: It's state of mind, I 16 need your help. 17 THE COURT: She said she was looking 18 out the window for a time and then she was off the 19 plane. 20 MS. VASQUEZ: And she recorded him. 21 THE COURT: Then she recorded it. Just 22 the window of her state of mind, so I'm going to	4413	1 on me bad. Never seen him like this before. It's 2 worse than I've ever seen before. It's over. 3 Maybe not forever but we're definitely on a 4 break." 5 That's also state of mind, and it's 6 also present sense impression. 7 THE COURT: Okay. I'm going to sustain 8 as to present sense impression. Again, it's after 9 the fact, and she's just talking about this -- 10 what she says happened. 11 And you're saying the first one, "I'm 12 not good" is her state of mind? 13 MS. BREDEHOFT: Definitely state of 14 mental mind. 15 THE COURT: All right. What's your 16 response to that? 17 MS. VASQUEZ: It's vague. I'm not 18 good. She could be not good in a lot of senses. 19 There's no context there. I'm not good? 20 THE COURT: All right. So, state of 21 mind must relate to a mental state that is 22 relevant to the litigation.

<p>4414</p> <p>1 How is this relevant to the litigation? 2 MS. BREDEHOFT: She just got -- after 3 being abused, she just got off the plane and she's 4 not good. That's highly relevant. He's saying 5 that he never abused her and that she abused him. 6 MS. VASQUEZ: She doesn't say she was 7 abused. She just says, "I'm not good." 8 THE COURT: I'm going to overrule the 9 objection to "I'm not good," but I'm going to 10 sustain as to the last one, okay? Thank you. 11 MS. VASQUEZ: Thank you. 12 MS. BREDEHOFT: This needs to be 13 redacted. 14 THE COURT: So, 205 with redactions is 15 in evidence. 16 MS. BREDEHOFT: Thank you, Your Honor. 17 May we publish to the jury? 18 THE COURT: It is. 19 MS. BREDEHOFT: Thank you. 20 (Open court.) 21 BY MS. BREDEHOFT: 22 Q So, "Rocky" on this is</p>	<p>4416</p> <p>1 Q What, if any, communication did you 2 have with your mother or your father following 3 this incident? 4 MS. VASQUEZ: Objection. Hearsay. 5 THE COURT: Sustain that objection. 6 MS. BREDEHOFT: Let's go to Defendant's 7 222. 8 And, Your Honor, I suspect we're going 9 to be back up. 10 THE COURT: Do you want to approach? 11 That's fine. 12 (Sidebar.) 13 THE COURT: All right. So you -- the 14 one from the father is obviously hearsay, right? 15 MS. BREDEHOFT: Yeah, the one I'm 16 looking at is in the blue box. And that is state 17 of mind and present sense impression. She's going 18 through and recounting what transpired. 19 THE COURT: And when was -- 20 MS. BREDEHOFT: This was 5:24. 21 THE COURT: You're saying present sense 22 impression for all of this?</p>
<p>4415</p> <p>1 Rocky Pennington, your best friend; is that 2 correct? 3 A Yes, it is. 4 Q Okay. And when did you send this 5 communication to Rocky? 6 A Once I had touched down in LA. 7 Q Okay. And you said "I'm not good." 8 What did you mean by that? 9 A That I needed help. 10 Q Okay. 11 A That I was scared. I was scared of 12 what had just happened to me. I was scared of 13 what was going to happen to me. I was scared if I 14 left him. I was scared if I didn't. I needed 15 help. I just needed support. I couldn't -- I 16 didn't feel safe going home. I still had my place 17 in Orange, he had keys. 18 I -- I was scared. 19 Q Did you text your mother and your 20 father about this incident? 21 MS. VASQUEZ: Objection. Hearsay. 22 THE COURT: If you want to...</p>	<p>4417</p> <p>1 MS. BREDEHOFT: Yes. It's describing 2 what transpired, and then, it's also state of 3 mind, how she is feeling about this and her 4 struggle. 5 MS. VASQUEZ: After the fact, Your 6 Honor. 7 MS. BREDEHOFT: Even after the fact, 8 that doesn't take out state of mind. 9 THE COURT: Present sense impression is 10 not after the fact. It's a present sense. 11 MS. BREDEHOFT: It's state of mind. 12 She's saying where she is and how confused she is. 13 THE COURT: I'm going to sustain the 14 objection to this. All right? Thank you. 15 MS. VASQUEZ: Thank you, Your Honor. 16 (Open court.) 17 BY MS. BREDEHOFT: 18 Q What, if any, communications did you 19 have with Kate James following the Boston plane 20 incident? 21 MS. VASQUEZ: Objection. Hearsay. 22 MS. BREDEHOFT: Your Honor, if we go to</p>

4418	4420
<p>1 224. 2 THE COURT: Okay. 224. 3 MS. BREDEHOFT: My argument would be 4 business records exception. 5 THE COURT: All right. If you want to 6 come forward, we can do that. 7 (Sidebar.) 8 THE COURT: Just let me read it. All 9 right. You're saying the text message is business 10 records? 11 MS. BREDEHOFT: Yes, with her employee. 12 She's also -- she talking about the hotel 13 arrangements. She's asking her to book her on the 14 plane, which is what her role is, she works for 15 her. 16 THE COURT: But that -- 17 MS. BREDEHOFT: Redirecting her texts, 18 etc. So it's a business record. 19 But, Your Honor, the exception says 20 it's a business record exception, that's an 21 exception to the hearsay rule. 22 THE COURT: It's an exception, but then</p>	<p>1 stand right now. 2 MS. BREDEHOFT: But she was a witness 3 and it would be impeachment. 4 THE COURT: You can only impeach the 5 person that's on the stand, okay? 6 MS. BREDEHOFT: Okay. 7 THE COURT: I'll sustain the objection. 8 (Open court.) 9 BY MS. BREDEHOFT: 10 Q So, what, if anything, did you do the 11 evening of the 24th of May? 12 A I reached out to friends and family, 13 asked for support. 14 MS. VASQUEZ: Objection. Hearsay. 15 THE COURT: Sustained. 16 A And surrounded myself with them, with 17 that. 18 Q What, if anything, did you do for 19 Lily-Rose's birthday? 20 A I -- that's why we had gone back to LA. 21 Johnny was sick after having passed out on the 22 plane. So I took her to dinner. We went to</p>
4419	4421
<p>1 it also says, I can read it to you, if there's any 2 opinions in it then that has to cover that hurdle. 3 MS. BREDEHOFT: But -- 4 THE COURT: And this is clearly all 5 opinions in here. It's bad. It's worse than 6 ever. Those are all opinions. Even if you get it 7 in as a business record, none of the opinions come 8 in, unless you have another reason -- 9 MS. BREDEHOFT: So, here's my other 10 question: Kate James has testified and was 11 allowed to testify. 12 THE COURT: I can only handle the 13 objections that are brought before me. 14 MS. BREDEHOFT: I understand. She 15 testified because it was admissions against 16 interest. 17 THE COURT: Right. 18 MS. BREDEHOFT: She said Amber Heard, 19 you know, was having a great time, wasn't worried 20 about it, never said anything to her. 21 Can't I do an impeachment on that? 22 THE COURT: Ms. James is not on the</p>	<p>1 Benihana's. It was, you know, again, put on my 2 smile, took her out. Tried to make her feel loved 3 and celebrated for her birthday. And then I 4 booked a flight out to New York to go back to New 5 York, obviously, without Johnny. 6 Q I'm going to ask you to, now, turn to 7 225. 8 MS. BREDEHOFT: And, Your Honor, I'm 9 going to be referring to the last two blue spots 10 on that page, with the state of mind, mental 11 condition. 12 THE COURT: All right. 13 MS. VASQUEZ: It's still hearsay, Your 14 Honor. May we approach? 15 THE COURT: Yeah, would you want to 16 approach. I just want to make sure I get the 17 right context. 18 (Sidebar.) 19 THE COURT: Which ones? The last two? 20 MS. VASQUEZ: Yeah. 21 MS. BREDEHOFT: The last two. Crying 22 my eyes out.</p>

4422	1 THE COURT: She's sending them in two 2 separate texts. All right. 3 Crying my eyes out. So, now, this is? 4 MS. BREDEHOFT: State of mind. 5 THE COURT: After dinner? 6 MS. VASQUEZ: After dinner, when she's 7 at a hotel. 8 THE COURT: We're losing context here 9 because this is after she took the daughter out. 10 MS. BREDEHOFT: Well, true, it's after 11 what she -- remember that Kate James testified she 12 was having a great time, she was consuming and no 13 big deals, she wasn't upset at all. And this is 14 what she's expressing to Kate James, that she's 15 crying her eyes out, which is her state of mind at 16 that point. She's crying her eyes out, she's very 17 upset. 18 THE COURT: But you're trying to relate 19 it back to the time on the plane, her state of 20 mind. State of mind needs to be -- 21 MS. BREDEHOFT: Sure. She's still 22 upset. It just didn't go away.	4424	1 MS. VASQUEZ: I believe you just 2 sustained an objection to the same type of text 3 message. 4 THE COURT: I understand. 5 MS. BREDEHOFT: Actually, I thought the 6 "I need your help" to Rocky came in for precisely 7 that reason. 8 THE COURT: Well, she's had just gotten 9 off the plane. Is that where we're at now? Or is 10 this after dinner again? 11 MS. BREDEHOFT: 7:57. 12 MS. VASQUEZ: On what day, the 20... 13 MS. BREDEHOFT: '4th. 14 MS. VASQUEZ: 24th. 15 MS. BREDEHOFT: To her sister. 16 MS. VASQUEZ: That was sustained. 17 MS. BREDEHOFT: I still think it's her 18 state of mind, Your Honor. She's saying, you 19 know, "I need help." 20 THE COURT: So you're just trying to 21 get "I need your help"? 22 MS. BREDEHOFT: Right. Recognizing I
4423	1 THE COURT: I'll sustain the objection. 2 Thank you. 3 MS. VASQUEZ: Thank you, Your Honor. 4 (Open court.) 5 BY MS. BREDEHOFT: 6 Q I'm going to ask you to turn, now, to 7 228. 8 MS. VASQUEZ: Your Honor, we're going 9 to object on hearsay. 10 THE COURT: If you want -- 11 MS. BREDEHOFT: First line, Your Honor. 12 Is all -- understanding Your Honor's ruling, but I 13 think... 14 THE COURT: All right. If you want to 15 come forward, that's fine. 16 (Sidebar.) 17 THE COURT: All right. State of mind? 18 All right. And is this -- 19 MS. BREDEHOFT: I need your help. I 20 think that's clearly her state -- 21 THE COURT: How is that her state of 22 mind? I got the other one in, I understand that.	4425	1 would like to get all of them -- 2 THE COURT: No, I understand that. 3 MS. BREDEHOFT: I fully appreciate Your 4 Honor's ruling. 5 THE COURT: A statement of the 6 declarant's then existing state of mind, emotion, 7 sensation, or physical condition, but not 8 including a statement of memory or belief to prove 9 the fact remembered. 10 MS. BREDEHOFT: That's not a memory. I 11 think that's clearly a state of mind, I need help. 12 MS. VASQUEZ: Your Honor, you just 13 sustained the same objection to "I need help" to 14 Rocky Pennington. It's the same thing. It's 15 honestly the same message. 16 THE COURT: It is the same message. 17 MS. VASQUEZ: This is what she did. 18 MS. BREDEHOFT: This is what she did? 19 MS. VASQUEZ: Doesn't matter. 20 THE COURT: I don't see "I need your 21 help" going to state of mind. I'm going to 22 sustain the objection.

4426	1 MS. VASQUEZ: Thank you, Your Honor. 2 MS. BREDEHOFT: Present sense 3 impression? 4 THE COURT: Noted for the record. 5 (Open court.) 6 BY MS. BREDEHOFT: 7 Q So, tell us what -- please tell the 8 jury what you did, then, over that night, the next 9 day, and at the hotel. 10 A I cried, a lot. I tried to surround 11 myself with my friends and resolve to leave him. 12 I felt -- I felt powerless. Nothing I did made a 13 difference. You know, on the plane, I was so 14 careful -- 15 MS. VASQUEZ: Objection. 16 Nonresponsive. 17 Q Please just tell us what you did, and 18 you can tell how you feel, but don't go backwards, 19 okay? 20 A I resolved -- I tried to -- just get 21 the strength to commit to leaving him. I mean, I 22 knew I had to. I knew nothing else would make a	4428	1 Q What's his name? 2 A His name is Stephen Deuters. 3 Q Okay. And what, if any, communication 4 were you having with him following the Boston 5 plane incident? 6 MS. VASQUEZ: Objection. Hearsay. 7 May we approach? 8 THE COURT: All right. Yes, you may. 9 (Sidebar.) 10 MS. VASQUEZ: So, I'll let 11 Ms. Bredehoff. 12 THE COURT: What was your objection, 13 first? 14 MS. VASQUEZ: My objection is hearsay, 15 Your Honor. Very few employees are hired to be 16 speaking agents. Mr. Deuters, while acting as an 17 assistant to Mr. Depp, was not in charge of 18 communicating with his then girlfriend/fiancée. 19 And statements on speaking agents, only on matters 20 within the sphere of their responsibilities. 21 THE COURT: And during the terms of 22 their employment.
4427	1 difference. So I got myself back to LA -- I mean, 2 I'm -- excuse me, New York. And started going to 3 Al-Anon meetings every day. It's a support group 4 for people who love addicts and alcoholics. 5 Q What, if any, communications did you 6 have with Stephen Deuters? 7 MS. VASQUEZ: Objection. Hearsay. 8 MS. BREDEHOFT: Your Honor -- 9 Q Let me ask it this way: What, if any, 10 communications did you have with Mr. Deuters 11 communicating on behalf of Mr. Depp? 12 MS. VASQUEZ: Objection. Hearsay. 13 MS. BREDEHOFT: I would say agency on 14 that. 15 THE COURT: You have to lay a 16 foundation for that. 17 MS. BREDEHOFT: All right. Let's go to 18 229A. 19 Q And could you -- without saying what 20 the content is, could you tell us who this text 21 message is with? 22 A Johnny's assistant.	4429	1 MS. VASQUEZ: And during terms of their 2 employment. 3 THE COURT: I understand that. 4 MS. BREDEHOFT: He says here, "He's 5 teary. He doesn't want to be a fuckup anymore." 6 His words. And he testified, in his deposition, 7 Your Honor will remember we showed that, that 8 Mr. Depp told him to reach out to Amber. 9 THE COURT: Depositions aren't 10 foundation for here, okay? So if you had him here 11 to testify that he told him to say that. 12 MS. BREDEHOFT: So, we should wait 13 until later on these? 14 MS. VASQUEZ: The deposition, you 15 didn't rule on it. 16 THE COURT: Okay. I didn't rule. So 17 it wasn't part of the designation. 18 MS. VASQUEZ: No. 19 THE COURT: So his deposition is not 20 coming in? 21 MS. VASQUEZ: Correct. 22 MS. BREDEHOFT: I'm not positive we

4430	1 won't want to put that in, Your Honor. 2 THE COURT: We can't. The depositions 3 are done. 4 MS. BREDEHOFT: I understand. Again -- 5 THE COURT: Depositions are done in 6 this case. 7 MS. BREDEHOFT: I understand. 8 THE COURT: That ruling isn't 9 happening. 10 MS. BREDEHOFT: I understand. 11 My argument here is for the entirety of 12 29, which goes from 29A through M. It's admission 13 by a party-opponent. A statement by the party's 14 agent or employee, made during the term of the 15 agency or employment, concerning a matter within 16 the scope of such agency or employment. 17 THE COURT: Right. That's what I have 18 here. I understand that. But I don't see the 19 foundation for that. Only matters within the 20 sphere of their responsibilities and during the 21 term of their employment. 22 MS. BREDEHOFT: So if I lay a	4432	1 MS. BREDEHOFT: M. 2 THE COURT: M as in Mary? 3 MS. BREDEHOFT: Yes. 4 THE COURT: So, 229A through M, I'll 5 sustain the objection. Note your objection for 6 the record for appeal. 7 MS. VASQUEZ: Thank you, Your Honor. 8 THE COURT: Okay. 9 (Open court.) 10 BY MS. BREDEHOFT: 11 Q Did you communicate, at all, with 12 Mr. Depp in the days following the plane -- Boston 13 plane incident? 14 A Yes, I did. 15 Q Please tell the jury about those 16 communications. 17 A I heard from him directly; I heard from 18 him through his assistants, who were texting for 19 him. 20 MS. VASQUEZ: Objection, Your Honor. 21 Hearsay. 22 THE COURT: I'll sustain the objection.
4431	1 foundation that she's communicating with him -- 2 THE COURT: You already said that. You 3 already laid that foundation. 4 MS. BREDEHOFT: He is an employee. 5 THE COURT: It doesn't -- 6 MS. BREDEHOFT: The deposition 7 testimony on this -- 8 THE COURT: You're saying, as a 9 personal assistant, it was in his realm of 10 employment to text the girlfriend of his employer? 11 MS. BREDEHOFT: That's what he 12 testified. 13 THE COURT: No, that is not before me. 14 MS. BREDEHOFT: Yes. 15 THE COURT: I'll sustain the objection. 16 MS. VASQUEZ: Thank you, Your Honor. 17 MS. BREDEHOFT: But I am making -- 18 THE COURT: I'm sorry, which one? 229? 19 For the record, I want to make sure I get them 20 all. A through. 21 MS. BREDEHOFT: M. 22 THE COURT: N --	4433	1 Q You're not allowed to testify about the 2 text messages with his assistant. But can you 3 tell the jury about your communications with 4 Mr. Depp? 5 A Okay. It's kind of confusing because 6 he's texting through them. 7 MS. VASQUEZ: Objection. Your Honor. 8 THE COURT: I'll sustain the objection. 9 I'll strike that from the record, and 10 you'll disregard that testimony. 11 Please answer the question. 12 Q Just confine it to the communications 13 you had with Mr. Depp, please. 14 A That he was sorry and told me that he 15 was in a blackout. He didn't remember everything, 16 but what he did remember, he was ashamed of. 17 Begged me to forgive him. Said he understood. 18 Forgive me -- forgave me if I never wanted to 19 speak to him again. 20 I -- he text me, at one point, and 21 then -- and then I didn't respond right away, and 22 he text me again that he understood that I had

4434	<p>1 made my decision to move on and good luck and I 2 was better for it. And then continued to contact 3 me. 4 I spoke to him when I was in New York, 5 on the phone, and he said that he was – he had a 6 chip or that he was going to meetings; that he I 7 think, at the time, mentioned sober – another 8 celebrity that was kind of advising him on 9 sobriety – not advising him, but encouraging him. 10 He was saying, look, me and this person, we even 11 went to a meeting. I've got three days sober, 12 four days sober. And that was the last time. The 13 monster will never come back. The monster will 14 never come back. Because it felt like such a 15 different – it felt so much worse than it had 16 ever been before and because I had, you know, 17 went – went to New York and I was trying to get 18 my strength to leave him. I actually thought that 19 it kind of would be the turning point. I thought 20 I had a – 21 MS. VASQUEZ: Objection, Your Honor. 22 Nonresponsive.</p>	4436	<p>1 without saying anything about what's in the email? 2 MS. VASQUEZ: That calls for hearsay, 3 Your Honor. 4 MS. BREDEHOFT: I'm just asking if she 5 did. 6 THE COURT: Not what she said? 7 MS. BREDEHOFT: Correct. 8 THE COURT: Okay. Overruled. 9 Q Did you communicate to Mr. Depp what 10 you had drafted in the email? And don't -- you 11 don't get to say what you said. 12 A Yes. 13 Q Okay. And what, if any, response did 14 Mr. Depp have to your sending that email to him. 15 A He -- he came to New York to fight for 16 the relationship, for me, to prove that he was 17 sober and he was committed to changing. I 18 believed he was embarrassed and sorry. He said he 19 was and I believed him. So I took him back -- or 20 I got back with him on the condition that he would 21 uphold his promise to do the treatment, to do the 22 full detox, cleanup, and never go back.</p>
4435	<p>1 THE COURT: Overruled. 2 MS. BREDEHOFT: Thank you. 3 Q Go ahead. Please continue. 4 A I thought I -- I thought things would 5 change. 6 Q Did you draft any email to Mr. Depp to 7 express your emotions and how you felt about all 8 this? 9 MS. VASQUEZ: Objection. Hearsay. 10 MS. BREDEHOFT: I'll lay the 11 foundation, Your Honor. 12 Let's go to Defendant's 239. 13 THE COURT: 239. 14 MS. VASQUEZ: Objection. Hearsay, Your 15 Honor. 16 MS. BREDEHOFT: And I would say both 17 present sense impression and definitely state of 18 mind, Your Honor. 19 THE COURT: I'll sustain the objection. 20 MS. BREDEHOFT: All right. 21 Q So, did you ultimately communicate to 22 Mr. Depp what you first drafted up in an email,</p>	4437	<p>1 Q So I'm going to take you, now, up to 2 the June through August 2014 time frame. And I 3 think you testified earlier, and others have as 4 well, that Mr. Depp brought in Dr. Kipper and his 5 group, correct? 6 A Yes, he did. 7 Q Okay. Could you, please, describe for 8 the jury what those next few months were like? 9 A All of a sudden, the doctor gets 10 brought on that had – that we had been talking 11 about. I had heard this name before. And all of 12 a sudden, this doctor, Dr. Kipper, apparently, 13 wrote a book on addiction and was this doctor who 14 was going to be the solution, the cure, you know. 15 And he got – he got brought on board, and all of 16 a sudden, the plan was that this team would be 17 involved in Johnny's recovery. So it felt real. 18 It felt serious. I felt, like, protected. You 19 know, I had already, by this point, heard a 20 million times, it seems like, promises to get 21 clean and sober, but this felt like a change. And 22 they were going to come to Boston and start</p>

<p style="text-align: right;">4438</p> <p>1 working with Johnny and the plan was to keep 2 Johnny on the same level of drugs that he was on, 3 since he was filming. They needed him to finish 4 filming the movie, so he was going to be 5 maintained with his -- with prescription pills, 6 including the painkillers, and the plan was he 7 would, obviously, abstain from alcohol completely 8 and all other drugs, like weed and coke, and, 9 then, when he finished filming, the plan was to -- 10 MS. VASQUEZ: Objection. Your Honor. 11 Hearsay. Lack of foundation. 12 MS. BREDEHOFT: I don't understand what 13 the objection -- I don't think it is. I think she 14 was just explaining the context there. 15 THE COURT: Well, you can lay a 16 foundation of how she knew, that's fine. 17 Q How did you know that? 18 A I was involved in the conversation with 19 the -- 20 Q Okay. Continue. 21 A The doctors and his sister. 22 MS. VASQUEZ: Objection, Your Honor.</p>	<p style="text-align: right;">4440</p> <p>1 A I saw his medications change. I knew 2 the amount that Johnny told them he was on was so 3 that they -- they could maintain him for the 4 filming. Meaning, not make a drastic change in 5 the amount of painkillers he was taking. But 6 he -- his behavior, his whole personality changed 7 drastically. He would be speaking to me, and, at 8 the time, I was staying in Boston with him, having 9 wrapped my movie, and he would, in mid sentence, 10 mid word, would fall asleep. 11 One time, I was sitting across from 12 him, and he would come in and out of sleep, of 13 being awake or completely, what appeared to be, 14 asleep while talking to me, and he had a cigarette 15 in his hand. And, you know, Johnny constantly 16 smoked, and he just had this cigarette, you know, 17 as he fell asleep, while sleeping, down on his 18 leg. They're hand rolled cigarettes, they don't 19 stay lit very long, thankfully. 20 But, you know, it was things like that, 21 and I didn't understand it. Even though I had 22 experience with drug use in my family, I hadn't</p>
<p style="text-align: right;">4439</p> <p>1 That's still hearsay. 2 THE COURT: I'll sustain the objection. 3 MS. BREDEHOFT: That part is. 4 Q So, what happened next, as a result of 5 these communications, without saying what the 6 communications were? 7 A A nurse came to Boston, where Johnny 8 was. I just would come for short periods of time, 9 in between -- I mean on weekends from filming, 10 until I wrapped my movie, which I did, I think, in 11 May, if I'm not mistaken. And I went to Boston, 12 and I was there and saw a nurse was flown out to 13 Boston, Debbie Lloyd, and I believe Kipper came 14 out too. They put Johnny on a bunch of new 15 medications, which they shared with me. Told me 16 about. 17 MS. VASQUEZ: Objection. Your Honor. 18 Hearsay. 19 Q We have to be careful about what other 20 people told you, okay? But you can testify to 21 what you know, okay? 22 So, what happened then?</p>	<p style="text-align: right;">4441</p> <p>1 seen anything like this. And it was so dramatic, 2 the change, that I was trying to figure out, with 3 the nurses and doctors, what happened. What 4 changed -- how we could explain the change and 5 what medications were causing it. I knew there 6 were new medications involved. So, you know, I 7 was constantly worried and in communication, and 8 Johnny's behavior got worse and worse, more of 9 this passing out, nodding off, waking up in the 10 middle of the night screaming, waking up in the 11 middle of the night, sometimes, crying, and the 12 emotions would change from one to the next, like, 13 by the second. 14 I remember we were on a long weekend, 15 when he was filming in Boston. We went to this, 16 like, this resort, retreat hotel, and, you know, 17 he was just bawling, you know. It broke my heart. 18 There were just a lot of changes, and I really 19 didn't know -- I felt so bad for him and I thought 20 maybe it was just what Kipper had introduced into 21 the regime, the medications. But what I found 22 out, in that time, is that he was taking about</p>

4442	4444
<p>1 double the amount -- 2 MS. VASQUEZ: Objection. Your Honor. 3 Hearsay. 4 Q Is this your observation? 5 A I saw it. I saw it. 6 THE COURT: Okay. Overruled. 7 MS. BREDEHOFT: Thank you. 8 Q Please continue. 9 A He was taking about double the amount 10 that he told them was his normal when he started 11 the process with the doctors. 12 So, after a few, you know, it's, I 13 think, months of going, what is wrong? And, you 14 know, turning him over when he vomited at night or 15 checking his pulse. There were -- all of a 16 sudden, I just -- when I realized the amount was 17 about double, I realized, then, that he had been 18 lying to them and me about the amount so that he 19 could get extra high before he had to detox. 20 That -- I can't -- it was such an 21 agonizing few weeks, months. It was so agonizing, 22 I don't know how long it lasted. But I was so</p>	<p>1 would be this again. And it was so erratic and 2 so -- it changed so quickly. And I, naively, now, 3 really did not understand what was going on. 4 I deeply cared about this human's 5 well-being. 6 Q All right. 7 A And it was very confusing and scary. 8 Q So, did there come a time, then, that 9 Mr. Depp went into detox for Roxicontin, 10 Roxicodone, or whatever they're called? 11 A Yes. When he finished filming, the 12 plan was to do this detox, and that's what we did. 13 Q And when was that? 14 A That would have been early August of 15 2014. I believe we left -- we were there for, I 16 think, a week to ten days, 8th through the 18th, 17 more or less. 18 Q And we've heard some testimony about 19 this, but can you, please, describe for the jury 20 what took place during this detox on the Bahamas 21 Islands in August of 2014? 22 A It was, for the first few days, okay.</p>
4443	4445
<p>1 concerned for this person and he had just been 2 doubling up his meds because he didn't -- 3 MS. BREDEHOFT: So, Michelle, can you 4 pull up 1092. Defendant's Exhibit 1092. 5 Q Amber, did you take this picture of 6 Mr. Depp? 7 A I did. 8 MS. BREDEHOFT: Your Honor, I'm going 9 to move the admission of Defendant's Exhibit 1092. 10 THE COURT: Any objection? 11 MS. VASQUEZ: No objection. 12 THE COURT: All right. 1092 in 13 evidence. 14 You can publish. Thank you. 15 Q And can you describe what's depicted 16 here and why you took this picture? 17 A This was during that time when the 18 prescriptions that he was on and the doubling up 19 of the opiates got so bad that he -- he was -- he 20 was like this, just throughout the day, off and 21 on. And then he would take Adderall and he would 22 be really animated and ready to go, and then it</p>	<p>1 Peaceful. I -- the nurse, and then later nurse 2 and doctor, were staying on a different part of 3 the island, a few minutes' drive by ATV, like, 10, 4 15 minutes, by, you know, one of those, you know, 5 ATV vehicles. But we communicated via 6 walkie-talkie and occasionally through texts. It 7 was okay at first, and then the behavior -- then 8 it just really wasn't okay. It was up, down. 9 He'd be mad at me then he was wanting a hug. He 10 cried a lot and then he, you know, wanted to have 11 sex a lot. Which was just not like Johnny at all. 12 And it was just like that. It was just up, down 13 mood. And it felt like I was constantly catering 14 to the mood, whatever he was going through at the 15 time. I was just trying to adapt and just roll 16 with it and provide support. I was taking his 17 blood pressure. I was on a schedule and in 18 constant communication with the nurses about 19 delivering the meds, giving him his meds at a 20 certain time. I was just trying to take care of 21 him. 22 And a few days in, you know, I guess</p>

<p style="text-align: right;">4446</p> <p>1 the effects of the detox really started to change, 2 and it went from this, like, erratic behavior, up 3 and down, up and down, to just really down or mad. 4 He would burst into anger at me, yelling at me 5 across the -- I walked away from it at the table. 6 I crossed the table in a certain way, and he 7 screamed at me about that and he tried to overturn 8 this table. Luckily, it was bolted down to the 9 deck. But I remember him shaking it and 10 screaming. At a different point, he was really 11 calm and sweet and thanking me. Then another -- 12 you know, he -- looked like he was balancing out 13 and we had a conversation, and he was saying he 14 wanted to quit, like quit the detox. He couldn't 15 do it anymore. And I was trying to find the 16 language to encourage him. You know, I was trying 17 to remind him how much he wanted that. How much 18 he had told me he wanted that. How much he -- I 19 was reminding him, he told me all the time, I 20 saved his life and he wouldn't be doing this 21 without me. I was telling him these things. 22 At one point, in our conversation, I</p>	<p style="text-align: right;">4448</p> <p>1 nurses didn't tell me not to. I didn't -- I had 2 no idea what that was going to look like or be 3 like. And it was hell. You know, we're on an 4 island, I'm trying to take care of him, and he's 5 hallucinating. 6 MS. VASQUEZ: Objection, Your Honor. 7 Nonresponsive. 8 THE COURT: Overruled. 9 A Screaming at me for things I said when 10 I didn't say -- I hadn't said anything. I would 11 tell him, Johnny -- 12 MS. VASQUEZ: Objection, Your Honor. 13 Hearsay. 14 MS. BREDEHOFT: I think in the context, 15 Your Honor. It's not offered to prove the truth 16 of the matter asserted. 17 THE COURT: What's it for, then? 18 MS. BREDEHOFT: Just telling the 19 context of the -- 20 THE COURT: I'll sustain the objection. 21 MS. BREDEHOFT: Okay. 22 Q Please continue, and just say what he</p>
<p style="text-align: right;">4447</p> <p>1 told him about how -- 2 MS. VASQUEZ: Objection. Your Honor. 3 Hearsay. 4 Q Please try to continue without what you 5 said, please. 6 A I said something to him and he got so 7 angry at me, he slapped me across the face. But 8 he did it, like, while crying. It was the 9 weirdest thing. He was crying, saying no woman 10 had ever embarrassed him like that. No woman had 11 ever made him feel like that. I heard that for 12 the rest of the trip, too, on repeat. 13 And I felt bad. I feel bad, still feel 14 bad. But, you know, I didn't want to make him 15 feel embarrassed. That's not what I wanted to do. 16 This was way over my head. I don't know how to 17 detox someone. I don't know how to do that. I 18 shouldn't have been there. He wanted -- 19 Q Why were you there? 20 A Because he asked me to. And I didn't 21 know that that was a phenomenally dumb idea. I 22 don't know why anyone -- why the doctors and</p>	<p style="text-align: right;">4449</p> <p>1 said and he did and what your observations were. 2 A He was accusing me of having a man in 3 the house with me. We were in a single, you know, 4 in a cabin. It's basically one room, with a 5 closet and a bathroom. I mean, there's nowhere to 6 hide, really. There's a closet and a bathroom. 7 He, at one point, told me that I was hiding 8 somebody in the house. 9 Another point, he was communicating 10 with someone not in the room. He would yell at me 11 and then yell at someone else, who wasn't there. 12 And I tried to ask for what I should do. I didn't 13 know what to do. It was terrifying and strange. 14 The whole week was. 15 Q So, after you left Bahamas and finished 16 with the detox there, where did you go from there? 17 A We, meaning Debbie Lloyd, Dr. Kipper, 18 and I and Johnny, we flew back to LA, and he was 19 going back and forth between saying he wasn't 20 going to continue to he was committed. It was 21 back and forth. Everything was up and down, 22 erratic, like, changing every second. And we got</p>

4450	<p>1 to LA and Debbie and Kipper communicated with me, 2 I won't say what they said, but I decided it would 3 be probably in everyone's best interest if I went 4 away to a hotel. Johnny put me up in this room, 5 in this hotel, while he finished the process of 6 detox in LA, and I had my friends out with -- my 7 girlfriends there to support me, as per usual. 8 MS. BREDEHOFT: So let's -- Michelle, 9 can you pull up 272, please. 10 Q And after you both returned to LA, did 11 Mr. Depp communicate with you by text while you 12 were apart, while he was finishing the detox? 13 A Yes, he did. 14 MS. BREDEHOFT: Your Honor, I would 15 like to move the admission of 272. 16 THE COURT: Any objection. 17 MS. VASQUEZ: Yes, Your Honor, to the 18 first message -- excuse me, Your Honor, to the 19 second. 20 THE COURT: You mean the response? 21 MS. VASQUEZ: Right. 22 THE COURT: Okay.</p>	4452	<p>1 to speed up the process. I love you more than 2 life. Yours, Steve." 3 Do you see that? 4 A I do. 5 Q So, what, if any, expressions was 6 Mr. Depp giving you, at this point, that he was 7 angry with you ever having to help participate 8 with the detox or to be on the island or anything 9 along that line? 10 MS. VASQUEZ: Objection. Form. 11 Compound. 12 THE COURT: I'll allow it. But just 13 for -- trying to keep the record clear. 14 272 has already been entered into 15 evidence without that redaction, and there wasn't 16 any objection, so I wish -- if I could have both 17 sides to keep track of their evidence. It's not 18 my job to keep this. 19 MS. BREDEHOFT: Thank you, Your Honor, 20 and I just got a note to that effect. 21 THE COURT: Okay. So, 272 is in 22 evidence without -- you can clear the redaction</p>
4451	<p>1 MS. BREDEHOFT: And it's just present 2 sense impression, but I'm understanding Your 3 Honor's rulings on that. 4 THE COURT: I'll sustain. 5 If you want to redact it, that's fine. 6 MS. BREDEHOFT: Can you redact that 7 second message. 8 All right. Your Honor, I -- 9 THE COURT: All right. Any objection, 10 272 redacted? 11 MS. VASQUEZ: No, Your Honor. 12 THE COURT: Okay. 272 in evidence, and 13 we can publish. 14 Q And, Amber, I'm going to show you, now 15 what is Exhibit 272, and this is on August 20, 16 2014. It's a text message from Mr. Depp to you. 17 Do you see that? 18 A Yes. I do. 19 Q Okay. And just so that we can 20 highlight here, he's calling you -- he says, "Just 21 to let you know that I'm fine, my angel. I miss 22 you of course, but this was the right thing to do</p>	4453	<p>1 and publish it. It's really the parties' 2 responsibility to take care of the record, not 3 mine. 4 MS. BREDEHOFT: My apologies, on that 5 one, Your Honor. 6 All right. 7 THE COURT: All right. And I overruled 8 the objection, so she can answer the question. 9 MS. BREDEHOFT: Thank you, Your Honor. 10 A I'm sorry, can you remind me what the 11 question is? 12 THE COURT: That's fair. 13 MS. BREDEHOFT: That's fair. 14 Q What, if anything, did Mr. Depp say 15 about that you were torturing him on the island 16 and that he didn't want you there? 17 A Very confusing for me to hear that 18 because even though he was hallucinating and angry 19 at me at various moments, when he would have these 20 kind of episodes, I did nothing but try to take 21 care of him. I'm not a nurse. I did my best to 22 support him, and he thanked me. He thanked my</p>

<p style="text-align: right;">4454</p> <p>1 mom. He thanked my dad. Told me, of course, I 2 saved his life. That he wouldn't be able to make 3 this change without me, and that this process was 4 horrible and hard on him and us and me, but that 5 he was so thankful that I was there for him. 6 MS. BREDEHOFT: Okay. We can take this 7 down now, Michelle. Thank you. 8 Q I'm going to take you up to 9 September/October of 2014. 10 Do you remember filming Magic Mike 2 in 11 that time frame? 12 A Yes, I do. 13 Q And what, if any, connections did you 14 have with Mr. Depp in that time frame? 15 A Well, I bargained with him about me 16 doing the role. And he told me he would call the 17 actors. It was a mostly male cast. But I 18 bargained with him -- 19 MS. VASQUEZ: Objection, Your Honor. 20 Hearsay. 21 Q Don't say what you said, just say what 22 he said, okay?</p>	<p style="text-align: right;">4456</p> <p>1 MS. BREDEHOFT: It is a text exchange, 2 Your Honor. But the green is Mr. Depp and the one 3 I'm most focused on is on the second page, Your 4 Honor, the top. 5 THE COURT: The green bubble on the 6 second page? 7 MS. BREDEHOFT: Yes. 8 THE COURT: All right. So just that 9 text? 10 MS. BREDEHOFT: Based on Your Honor's 11 rulings, yes. 12 THE COURT: Any objection to that text? 13 MS. VASQUEZ: No. Thank you, Your 14 Honor. 15 THE COURT: Okay. If we can get that 16 redacted. 17 Q And while that's being redacted, Amber, 18 let me ask you, what, if any -- anything, was 19 Mr. Depp saying to you in this time frame, we're 20 talking November 2014, about you not working 21 anymore or not taking on any more work or 22 auditioning?</p>
<p style="text-align: right;">4455</p> <p>1 A Uh-huh. He reluctantly kind of agreed 2 to me working on this movie, or taking the job. 3 He was filming a different movie in London at the 4 time. I wasn't going to play a sexualized 5 character. I wore no makeup, or minimal makeup in 6 the movie. No sexy clothing. No kissing scenes. 7 No sex scenes. So I went and did that film in 8 October of 2014, in Georgia, while he finished his 9 movie in London. And then, at some point, he came 10 out to pick me up in Georgia and was there for my 11 last, like, day or two filming. 12 Q I'm going to ask you to turn to -- 13 MS. BREDEHOFT: Michelle, can you bring 14 up 310, please, Defendant's 310. 15 Q Did you have communications with 16 Mr. Depp about auditioning for another role in 17 this time frame? 18 MS. VASQUEZ: Objection, Your Honor. 19 I'm going to object to the exhibit. That's 20 hearsay. 21 THE COURT: I'm not sure who's in the 22 text exchange.</p>	<p style="text-align: right;">4457</p> <p>1 MS. VASQUEZ: Objection, Your Honor. 2 Compound. And leading. 3 MS. BREDEHOFT: They're all a subset. 4 THE COURT: Overruled. I'll allow it. 5 MS. BREDEHOFT: Thank you. 6 A Johnny was angry with me for working. 7 I had finished my job and I needed to eventually 8 find another job, meaning a movie, to work on, and 9 he was furious at me for -- he found on, like, we 10 call them sides, just pieces of an audition, 11 and he found something that had been sent 12 to me to consider auditioning for, and he blew up 13 at me for -- yeah, I think he -- what he said to 14 me was that I didn't tell him -- that I didn't ask 15 him. And that because he didn't know about that 16 audition, that I hadn't done yet, that I had been 17 hiding it. And he was furious at me. 18 I ended up not doing that audition, I 19 believe. Well, there is a few, one or two, at 20 that time, that I did put my -- I did audition for 21 and one or two that I didn't. 22 Q Okay. I'm going to ask you, now, to</p>

4458	<p>1 take a look at what is Defendant's Exhibit 310. 2 Do you recognize this email from 3 Mr. Depp? 4 A Yes, it's a text. 5 MS. BREDEHOFT: Your Honor, I'm going 6 to move for the admission. 7 THE COURT: It's in. 310, it's in with 8 the redactions. I published it. 9 MS. BREDEHOFT: Okay. 10 Q Please tell the jury about this text 11 and the context. 12 A This was Johnny's response to me 13 apologizing for having an audition. 14 Q Okay. Thank you. 15 All right. Now, I'm going to stay in 16 November of 2014. 17 And did there come a time that Mr. Depp 18 told you that he understood that you were not 19 going to accept any more jobs, that you were going 20 to stop working? 21 A Johnny said this to me in an argument, 22 in a fit of rage, is the best way I can describe</p>	4460	<p>1 don't want to be objectified but you're doing it 2 to yourself. You know, you -- at first, it was 3 because I dressed a certain way or had sex scenes, 4 then it just got more narrow, more narrow, more 5 narrow what I could do, without being the blame 6 for why the industry, Hollywood, the entertainment 7 industry was putting me in a box and objectifying 8 me. So it became my fault, and I believed it. 9 You know, I believed it. I adopted a lot of these 10 changes myself, not because Johnny, you know, said 11 you have to do it this way, but because of all the 12 other things that he said and did. I eventually 13 found myself making decisions about my own career, 14 about how I dressed, how I wore my hair, how I 15 presented, where my eyes looked at when I walked 16 into a room. I believed those were my own 17 decisions. 18 Q Amber, did there come a time, in 19 November 2014, that you engaged in some couples 20 counseling with Dr. Cowan and you and Mr. Depp? 21 A We attempted to. I had stopped seeing 22 my therapist at the -- in 2014. I couldn't</p>
4459	<p>1 it, and kind of alluded to me having agreed to not 2 work anymore. Which, if you don't know me, is -- 3 is preposterous. There's no way I would agree to 4 that. Although, I did make concessions and gave 5 up a lot of -- 6 MS. VASQUEZ: Objection, Your Honor. 7 Hearsay. 8 MS. BREDEHOFT: That wasn't -- 9 THE COURT: Overruled. 10 MS. BREDEHOFT: Thank you. 11 Q Please continue. 12 A So he reached out to other people and 13 to me to that effect. Furious at me for taking 14 meetings. There was one, in particular, I 15 wanted -- one meeting I wanted to take because it 16 was a project in development with a sci-fi writer, 17 and I remember I wanted to take that. These 18 things were just -- they were just constant and 19 constant fights, but in between them, when things 20 were good between Johnny and I, he would be, you 21 know, he would word it to me like I'm trying to 22 look out for you. You know, you say that you</p>	4461	<p>1 sustain seeing her and be in the relationship with 2 Johnny, and I chose Johnny. Eventually, 3 Dr. Kipper introduced me to his close friend, 4 Dr. Cowan. And I met with Dr. Cowan and agreed to 5 let them share communication about my care, my 6 treatment, both what I said to Cowan and what I 7 said to Dr. Kipper, who had become my physician as 8 well. He also put a nurse on me that would be my 9 travel companion, and that travel companion would 10 keep tabs on me and report to Dr. Kipper, who 11 reported everything to Johnny. 12 MS. VASQUEZ: Objection. Hearsay. 13 Calls for speculation. 14 THE COURT: I'll sustain the objection. 15 MS. BREDEHOFT: Okay. 16 Q Okay. So tell us about the couples 17 therapy in November of 2014. 18 A So Dr. Cowan, this man who is friends 19 with Kipper, is treating me, agreed to see Johnny 20 and I together. And I don't know how many minutes 21 that went on before Johnny stormed out. Knocked 22 something off the table on his way out, and rolled</p>

<p style="text-align: right;">4462</p> <p>1 a joint in the bathroom before storming out of the 2 office, slamming the door. 3 Q All right. So I'm going to take you up 4 to December of 2014, and specifically December 17, 5 2014. And I'm going to ask you to take a -- what, 6 if anything, do you recall of an incident with 7 Mr. Depp relating to Clive Barker? 8 A Barker. He was the sci-fi writer that 9 I liked -- well, fantasy sci-fi writer. I 10 really -- I kind of had a dream project based on 11 books that I loved of this author. He's just a 12 weirdo genius artist/writer, and I had a meeting 13 with him, through another director, about a piece 14 of property he wanted to make into a movie. And I 15 just remember we were -- I believe we were at the 16 ECB, it was in December of 2014, when Johnny found 17 out that I had this meeting scheduled and furious 18 at me. Accused me of having this plan to sleep 19 with this -- he was mad that I was taking this 20 meeting at this man's house, but the man was very 21 ill, like, terminally ill, and not able to leave 22 his bed or his home. He was under home care and</p>	<p style="text-align: right;">4464</p> <p>1 what was happening, until, of course, he takes it 2 too far, hits me too hard, breaks too many things 3 in the house, and then leaves. Which was the 4 pattern. He would leave and not have to deal with 5 the cleanup. Never had deal with the cleanup. 6 Never had to deal with the destruction or see me 7 or the house that he had destroyed. Never had to 8 deal with my face the next day. He would just go. 9 I will call it splitting. He just split. 10 And eventually, I'd get an apology of 11 some kind or I would get an offer to have him come 12 over. He would offer to come over and talk or 13 give me my peace or give me my good-bye. And in 14 many ways, I found myself accepting that, knowing 15 that it was kind of false pretense because I, too, 16 wanted to resolve it. I didn't want him to think 17 I was sleeping with the sci-fi writer. I didn't 18 want him to think that I was this slut he said I 19 was all the time. I mean, part of me really 20 wanted to believe that he didn't mean those things 21 and I wanted to get to that part of him that would 22 tell me he didn't mean what he said and that he</p>
<p style="text-align: right;">4463</p> <p>1 very ill, and that person who was introducing us 2 explained to me how we had to meet, and I did. 3 And that was a big problem for Johnny. 4 At first, it was that he was concerned 5 about my safety. And I thought that was sweet 6 and, you know, there is something that I thought 7 was sweet and romantic about that. But combined 8 with the drinking, it just -- he -- it was not 9 very long before I was being accused of full-on 10 having this other plan to sleep with the writer in 11 order to get this part that I was already being, 12 you know, basically offered to develop. And it 13 was just this, you know, he switched from me 14 having -- he was accusing me of having this 15 ulterior motive with this director, the director 16 having it with me and this writer. And the 17 important thing that I can try to get across in 18 this moment is that nothing I said, no amount of 19 explaining, apologizing, accepting, not accepting, 20 agreeing to not go, nothing worked. Nothing 21 changed how mad he was at me and constantly 22 telling me I had done something wrong to deserve</p>	<p style="text-align: right;">4465</p> <p>1 was acting this way because he was messed up, you 2 know. And the cycle would repeat, I suppose. 3 Q Was there any physical violence on or 4 around December 17, 2014? 5 A Yes, is the answer to your question. I 6 just don't -- I don't really remember what 7 happened in that fight. I remember more 8 afterwards. I remember how apologetic he was for 9 it. I remember him telling me he took it too far. 10 I remember him saying he'd never do it again. And 11 I remember wanting to get to Christmas. You know, 12 Christmases are hard, probably, for everyone, and 13 I remember that it was close enough to Christmas 14 that I was tired and I wanted to be in a 15 forgiving -- not forgiving. I wanted to be in a 16 kind, gentle, peaceful state for Christmas. I 17 didn't want to go through a breakup this time. I 18 didn't want to -- you know, that's what I remember 19 at this time. 20 MS. BREDEHOFT: Let's bring up 21 Defendant's Exhibit 321, Michelle. This is on 22 12/17/2014.</p>

4466	1 Q Is this a text message exchange between 2 you and Mr. Depp? 3 A Yes, it is. 4 MS. BREDEHOFT: Your Honor, I would 5 like to move the admission of Defendant's 321. 6 THE COURT: Any objection? 7 MS. VASQUEZ: Sorry, Your Honor. Just 8 a quick minute. Your Honor, no objection. 9 THE COURT: All right. 321 in 10 evidence. You can publish it, please. 11 Q Amber, I'm just going to turn your 12 attention to this. This is an email exchange 13 between you and Mr. Depp and he says, "I'm truly 14 sorry to have upset you to the degree that I have. 15 I couldn't be more sorry for, yet again, ruining 16 your day. I do, of course, take your generosity, 17 your selflessness, your affection, your sweet 18 doting deeply into my heart, and I think that I've 19 been reciprocal. Agony is never the answer to any 20 equation or occasion, nor is rage. Please know 21 that my apology is sincere and solid. And as 22 stupid as it sounds, I hope your meeting with	4468	1 THE COURT: It's already in. 2 MS. BREDEHOFT: Oh, it's already in, 3 Your Honor. My apologies. We'll get that figured 4 out at lunch. 5 MS. VASQUEZ: What is that? 6 THE COURT: It's been in evidence. 7 Does anybody over there have a list of evidence 8 that's already in evidence? We're making sure? 9 MS. VASQUEZ: Without redactions? 10 MS. BREDEHOFT: Ours indicates it is. 11 It's in. 12 MS. VASQUEZ: Without redactions, Your 13 Honor? 14 THE COURT: It was redacted. I don't 15 know what it was redacted to. 16 MS. VASQUEZ: Well, the redactions 17 don't -- 18 THE COURT: That's how it is in 19 evidence, Mr. Murphy? We can check. We'll check 20 our copy. 21 MS. VASQUEZ: Thank you. 22 It's fine, Your Honor. We've
4467	1 Clive Barker is excellent." 2 Do you see that? 3 A Yes. 4 Q Okay. And then you respond "Thank you 5 for your words." 6 And you indicate you just left 7 Betty Sue's. That's his mother? 8 A Yes. And I then had a -- a glass of 9 wine with my former agent, Megan. 10 Q Okay. 11 A That afterwards, she encouraged -- 12 MS. VASQUEZ: Objection. Hearsay. 13 A Yeah. 14 Q Okay. Thank you. 15 A Sure. 16 MS. BREDEHOFT: We can take that down. 17 Let's bring up 325. Defendant's 325, please. 18 Q And this is an email exchange the 19 following day, 12/18/2014; is that correct? 20 A Yes. 21 MS. BREDEHOFT: Okay. Your Honor, I 22 move the admission of Defendant's 325.	4469	1 confirmed. Thank you. 2 THE COURT: Yes. 3 MS. BREDEHOFT: All right. 4 THE COURT: All right. It can be 5 published. 6 MS. BREDEHOFT: Thank you, Your Honor. 7 JUROR 3: Pardon the interruption, Your 8 Honor, but I can't see anything on my screen. 9 THE COURT: You can't see it on your 10 screen? Okay. We'll take care of that on a 11 break. 12 Oh, you got it? Okay. Thank you. 13 Go ahead. 14 MS. BREDEHOFT: Okay. Thank you. 15 Q So, this is from Mr. Depp, right? It 16 says "it's away. I let it go" too far -- "went 17 too far." 18 Do you see that? 19 A Yes, I do. 20 Q "I always regret it when I jump or 21 worse when you jump. I don't want to be 22 conditioned to continue that behavior. Therefore,

<p style="text-align: right;">4470</p> <p>1 I'll put in heavy work with shrank." 2 What is your understanding of what he's 3 referring to with "shrank"? 4 MS. VASQUEZ: Objection. Calls for 5 speculation. 6 Q Did you have an understanding of what 7 he meant? 8 A Yes, I knew exactly what he meant. 9 Q And what did he mean? 10 A "Shrank" is shrink. 11 Q What did he call shrink? 12 A Johnny called them shrinks, meaning 13 psychologist, therapist, shrink. 14 Q Okay. "I'm sorry for being less, for 15 your disappointment in me, for my behavior. I'm a 16 fucking savage." 17 Do you see that? 18 A Yes. 19 Q All right. "Going to lose that. Going 20 to lose that. The devil is all around, right?" 21 Now, you respond to this, and, of 22 course, before you go there, and he says, "I am</p>	<p style="text-align: right;">4472</p> <p>1 really hurt me. Sometimes I didn't think he 2 understood how much he could hurt me. Physically, 3 I mean. So, after this, I had a visible bruise. 4 I don't remember where, but I remember what other 5 people -- well, I can't say that, what they said, 6 so, anyway. And I, you know, in these fights, 7 would try to stand up for myself. 8 By December 2014, I was pushing back, I 9 would push him off of me. I tried to hit his 10 hands away. I tried to always get back up, which 11 was -- not sometimes, almost always made it worse. 12 Almost always seemed to provoke him, but I tried. 13 I would yell at him, I'd scream at him. I'd call 14 him ugly names. I'm ashamed of the names we'd 15 call each other. It was awful. It was awful. 16 And we both got into that pattern. It was so, you 17 know, I felt so angry that this was happening to 18 me and it felt just -- it felt so unfair, you 19 know. It felt like nothing I could do. Felt like 20 nothing I could do would change the sobriety 21 patterns. Nothing I could do would stand up. 22 Nothing I did would make him stop hitting me,</p>
<p style="text-align: right;">4471</p> <p>1 well aware that I should have been bigger at the 2 moment, and that it will never again manifest in 3 negative experiences. It can be done. What a 4 killer concept to visualize." 5 Do you see that? 6 A Yes, I do. 7 Q And you respond "I love you. I miss 8 you already," correct? 9 A That's right. 10 Q Okay. And what, if anything, is that 11 in -- consistent with the cycle that you have 12 described? 13 A Well, the language he used, after 14 particularly violent episodes, were savage, 15 monster, devil. We ended up both calling his 16 other side -- the side of Johnny that would do and 17 say unbelievably horrible things is very different 18 from the other Johnny that was, in my opinion, a 19 direct opposite. And this is typical of the 20 apologies that I would get when he took it too 21 far, physically. I was encouraged because I 22 thought it meant that he understood that he could</p>	<p style="text-align: right;">4473</p> <p>1 nothing. 2 So, you know, I tried for over a year, 3 maybe two, of just not responding physically, not 4 responding verbally, just staring at him. I tried 5 to freeze. I tried to go to a different place. I 6 would try, then, lashing out verbally. I would 7 try to threaten that if he hit me again, that I 8 would call the police. You know, the police were 9 called several times. I tried to do everything. 10 I even tried to leave, you know. Tried to leave 11 him. And nothing was working. And I think, by 12 this point in our relationship, we're both saying 13 awful things to each other, screaming at each 14 other, and, unfortunately, when Johnny would start 15 hitting me, he'd just win. I don't know how else 16 to describe it. 17 MS. BREDEHOFT: Your Honor, this might 18 be a good time for the lunch break. 19 THE COURT: All right. Ladies and 20 gentlemen, we'll go ahead and take our lunch break 21 at this time, until 2:00. Please do not discuss 22 the case or do any outside research, okay? Thank</p>

4474	1 you. 2 (Whereupon, the jury exited the 3 courtroom and the following proceedings took 4 place.) 5 THE COURT: All right. And again, 6 ma'am, please don't discuss your testimony with 7 anybody at this point, okay? 8 MS. BREDEHOFT: Thank you, Your Honor. 9 THE COURT: 2:00. 10 THE BAILIFF: All rise. 11 (Recess taken from 12:59 p.m. to 12 2:00 p.m.) 13 THE BAILIFF: All rise. Please be 14 seated and come to order. 15 THE COURT: All right. Okay. Are we 16 ready for the jury? 17 MS. BREDEHOFT: Yes. 18 THE COURT: Okay. 19 (Whereupon, the jury entered the 20 courtroom and the following proceedings took 21 place.) 22 THE COURT: All right. Thank you.	4476	1 me. I can't do it again. I can't live like that 2 again. I know you can't either, and I will for 3 both of us starting today. I love you. Again, 4 I'm so sorry, so sorry. I love you and feel so 5 bad for letting you down." 6 Do you see that? 7 A I do. 8 Q And was that the message that you -- 9 that you testified to that he gave you? 10 A Yes. 11 Q All right. Now I'm going to jump back 12 to where we left off. We're up in January of 13 2015. Danish Girl, you're filming in London; is 14 that correct? 15 A Yes. That would have been 16 January 2015. 17 Q Okay. Now, we heard some testimony 18 from Isaac Baruch earlier about a telephone call 19 that you had with Mr. Depp. 20 Do you recall that call? 21 A I do. 22 Q Can you please tell the jury? And
4475	1 All right. You may be seated. 2 Your next question. 3 MS. BREDEHOFT: Thank you, Your Honor. 4 Michelle, can you bring up Defendant's 5 Exhibit 236, which has already been admitted. 6 THE COURT: Thank you. 7 BY MS. BREDEHOFT: 8 Q Amber, I'm jumping back to the Boston 9 plane incident just for a moment. We had a lot of 10 different texts and a lot of exchange. But I just 11 wanted to point out to you this text message is 12 from -- this is from Mr. Depp to you, correct? 13 A Yes, it is. 14 Q And this is on 5/25, the day after the 15 Boston plane incident? 16 A That's correct. 17 Q All right. And he is saying, "Once 18 again, I find myself in a place of shame and 19 regret. Of course I am sorry. I really don't 20 know why or what happened, but I will never do it 21 again. I want to get better for you and for me. 22 I must. My illness somehow crept up and grabbed	4477	1 remember to tell them what Mr. Depp was saying on 2 that call. And you can give -- I didn't mean to 3 cut you off about the context. Go ahead. 4 A Is it okay to -- the nature of the 5 conversation was pleasant. 6 Q Yes. 7 A Friendly, fine, normal. And then 8 Johnny stopped making sense with this. Like he 9 would start a sentence and then trail off and act 10 confused when I would -- I would be confused. And 11 that pattern kind of increased pretty dramatically 12 in a short amount of time, and I was in a hotel 13 room in London speaking to him in Los Angeles, and 14 the phone, what I assumed, cut off. I thought it 15 was a connection issue, and I remember getting out 16 of bed and walking into the bathroom to get 17 something, you know, redialing him, in the span of 18 that short amount of time we were disconnected. 19 It was minutes, not even minutes. 20 I called him back, thinking the phone 21 had been disconnected and he answered and he said, 22 "How could you tell me that? How could you say

4478	<p>1 that to me? Who the fuck is he? Who the fuck is 2 he?" And he asked me that a few times, and I was 3 so confused. You know, I didn't understand what 4 he was talking about. I expressed that to him. 5 He said, "Who is the guy, the one in New York that 6 you're fucking?" 7 And it was -- it was such a bizarre 8 conversation because it had already started to 9 feel like he was not -- it was almost as if he was 10 confused by what sentence he had started by the 11 time he got to the end of it. And then all of a 12 sudden, he tells me that I have just told him that 13 I had a boyfriend or a lover in New York and I 14 had -- he's accusing me of having just told him 15 about it, which was crazy to me. 16 Not only was that not accurate, I would 17 never have communicated with him like that. I 18 wouldn't call him on the phone to do it and then 19 call him back and wonder what the connection issue 20 was. It was just the most bizarre thing. But he 21 was so worked up, incoherent, and accusing me of 22 having had this conversation with him. Eventually</p>	4480	<p>1 A Well, I had just started to pick out 2 the wedding dress right before that trip, and 3 plans were moving for us to get married shortly 4 after this trip. So we took this trip to promote 5 his movie. I went with him and we got into an 6 argument in the hotel room, and I -- I said -- I 7 don't remember what I said to him, but I said 8 something snotty to him that provoked him. It 9 provoked him, and when I walked into the hallway, 10 he grabbed me by the arm and slammed me up against 11 the hallway wall. And I kind of struggled with 12 him, tried to push him off of me. 13 And I managed to get out of his grasp 14 enough to take a few steps and kind of -- I kind 15 of curved around and went into the closet, and by 16 the time I made it into the closet, he had me by 17 the hair and what felt like he was just whaling on 18 me, but in a really sloppy way, like hitting me in 19 the back of my head, kind of wrestled me down to 20 the floor. I mean, it felt to me like I didn't 21 even have a fair shot because I wasn't even 22 really -- I wasn't facing him or looking at him; I</p>
4479	<p>1 the line drops out, and I spoke to the person who 2 picked up the phone. 3 Q Okay. 4 And how did that end? 5 A I no longer spoke to Johnny. I 6 probably can't say what the person told me. 7 Q Are we talking about Isaac Baruch? 8 A Yes. 9 Q So without saying what he said, you had 10 a brief conversation with Mr. Baruch, and that was 11 the end of the call? 12 A I did. It was my understanding Johnny 13 was passed out. 14 MS. VASQUEZ: Objection. Hearsay. 15 THE COURT: Sustained. 16 Q All right. January 25, 2015, Tokyo. 17 Please tell -- it's the premiere of Mortdecai? 18 A Correct. 19 Q Did you accompany Mr. Depp to Tokyo for 20 the premiere of Mortdecai? 21 A I did. I had just -- 22 Q Please tell the jury about that.</p>	4481	<p>1 was walking away from him. Or else, you know, I 2 would have at this point even, like, had a -- I 3 would have tried to defend myself more. But I 4 didn't. 5 I kind of felt like I didn't see it 6 coming, and he just wrestled me down to the 7 ground. And I remember he was screaming at me. I 8 mean, like really screaming, loud. And what I 9 remember of that is trying to get up and him kind 10 of wrestling me back down and then at one point 11 put his knee on my back, kind of like kneeling on 12 my back. And I just had this, like, struggle with 13 him. And I look at him, and he's still got his 14 glasses on. I just remember looking at him and 15 thinking it was so -- like he just looked like he 16 hadn't been through anything. 17 You know, he still had his glasses on, 18 sunglasses, and he was screaming at me that he 19 hated me, that it was over. He didn't want to 20 marry me. He was disgusted. He made this 21 mistake. It was a big mistake, and everyone hated 22 me. And I remember crying on the floor, just --</p>

<p style="text-align: right;">4482</p> <p>1 more than anything, I was heartbroken. I thought 2 maybe he was serious. I thought maybe, "God, he 3 doesn't love me. Maybe this is – maybe he really 4 feels these – this way." It broke my heart. It 5 broke my heart. I wanted to marry him so bad. I 6 wanted – this is the man I loved, you know. Yes, 7 it was awful at times, but I loved him and what 8 he – 9 MS. VASQUEZ: Objection, Your Honor. 10 Nonresponsive. 11 THE COURT: Overruled. 12 A What he was saying to me hurt just as 13 bad as anything else. I just remember that he 14 left me on the closet floor, and as 15 embarrassing – as embarrassing as it is to say, I 16 went up to him at some point, I don't know how 17 much time passed. He was sitting at the piano in 18 the living room of the hotel room that we had. 19 It's so – I know it may be hard to understand; 20 it's hard for me to hear myself say, but I felt – 21 I just wanted it to stop. I wanted things to just 22 be okay.</p>	<p style="text-align: right;">4484</p> <p>1 Nonresponsive. 2 THE COURT: All right. I'll sustain 3 the objection. 4 Next question. 5 Q I'm going to take you to February, the 6 next month, 2015, to your wedding. 7 Can you please tell the jury about your 8 wedding? 9 A We get married in Los Angeles. I get a 10 sense that we were just – it was just that 11 wedding running around Los Angeles, and I was 12 getting married that day and I remember running 13 around. Getting therapy. You know, I got ready 14 and Johnny and I met at the penthouses downtown, 15 and I wore a white dress and a veil I bobby pinned 16 in my hair, and I walked out of that penthouse and 17 met up with – met Johnny in the hallway, and I 18 thought he looked so handsome. 19 And he seemed happy. And I felt we 20 were really making the right decision. I was so 21 looking forward to having this, you know, thought 22 we would get married and we would have stability,</p>
<p style="text-align: right;">4483</p> <p>1 And I just sat next to him on the piano 2 and I just leaned my head on his shoulder, and of 3 course I was mad. Of course I was mad. It was 4 horrible what he'd done, but on the other hand, I 5 just really wanted us to be okay. I could just 6 put this other – I could put the physical stuff 7 in a box, and it just kept going back how much I 8 loved this person. So I just – put my makeup on 9 and went to the premiere with him and walked the 10 red carpet with him. 11 And I remember, in the car, checking my 12 bruises for pictures because my back was – my 13 dress was backless. Of all times to have a 14 backless dress. It was pictures. I was on the 15 red carpet. It was surreal because I just was 16 checking for bruises and making sure that 17 nothing – like there would be no marks on me, and 18 we just we looked like this other thing on this 19 red carpet when it was just – it was not like 20 that. It's embarrassing. I know it's hard to – 21 I'm sure it's hard to – 22 MS. VASQUEZ: Objection, Your Honor.</p>	<p style="text-align: right;">4485</p> <p>1 safety. So I -- we get in the car. We get into, 2 actually, Johnny's car, and for the second time 3 since I've known Johnny, he drove himself, drove 4 us, in his truck. It was weird being in the car 5 with him alone. You know, we didn't have that. 6 And we drove to his mom's house and a 7 justice of the peace arrived looking kind of 8 surprised, and she married us in the living room 9 of his mother's house, Betty Sue, with our 10 families together, my best friend, my mom, his 11 mom. We ate food with the kids, they were there, 12 and we had a wonderful evening and then got up and 13 got on the plane either the next morning or the 14 day after and flew to Johnny's island, and we 15 hired the -- what we had planned for the better, 16 you know, we had planned for the better part of a 17 year or so, maybe eight months, for this three-day 18 wedding on his island with our close friends, 19 about 12 people, maybe 15 people. 20 And we had had these little houses 21 built, like tents -- not tents, but not houses, 22 these little -- for the guests. We had them built</p>

<p style="text-align: right;">4486</p> <p>1 and designed on the island. He had people come 2 out, and it was magic, you know. I was marrying 3 the love of my life. It was complicated, but I 4 thought he was the love of my life. And we had 5 our friends and family out, and we had this 6 three-day event, the first of which -- well, the 7 first night of which was supposed to be he and I 8 separate with our relative parties, so me with the 9 bridal party and him with his fellows. 10 The bridal party, we had planned to do 11 a cuddle puddle, have mushrooms, and drink wine 12 and, you know, have our own, like, you know, girl 13 party separate. And then we'd, the next day, have 14 the wedding festivities. We were going to be 15 married around sunset and on this beach, not the 16 beach that Johnny had named for me, although we -- 17 I think we originally planned on having the 18 ceremony on that beach, but it was changed at some 19 point to the other beach. 20 And we walked down the aisle -- well, 21 the beach aisle and said our vows and the sunset 22 behind us, and we took pictures with our family.</p>	<p style="text-align: right;">4488</p> <p>1 take the majority of the year, meaning until 2 August, so maybe longer, so that the plan was to 3 do it when we did at this time so that we didn't 4 have to wait until the fall the following year. 5 So shortly after I left, Johnny returned to 6 Los Angeles and then flew from Los Angeles on to 7 Australia to shoot P5 -- Pirates 5. Excuse me. 8 Q And what was the plan for you when you 9 finished with Danish Girl? 10 A The plan was always for me to wrap on 11 my movie and then come and join him in Australia, 12 where he was filming P5 -- Pirates 5. 13 Q Okay. And when, approximately, was 14 that? 15 A That was March 3rd. 16 Q March 3rd that you wrapped, that you 17 finished with Danish Girl? 18 A I believe -- I can't recall the exact 19 date, but I believe it was around that time, yes. 20 Q Okay. And then tell the jury where did 21 you fly to to get to Australia? How long of a 22 turnaround was it for you to get to Australia?</p>
<p style="text-align: right;">4487</p> <p>1 And we shot the bird, meaning the middle finger, 2 up at the paparazzi helicopter circling or plane 3 circling around us while we were on the altar. 4 And we danced and celebrated. And then I left the 5 island because I had to go work. 6 Q And when you say you left the island 7 because you had to go work; what were you working 8 on that required that? 9 A I was filming the Danish Girl in 10 London, which was the film that I had been in 11 London for in January when Johnny was 12 hallucinating on the phone with me. I was there 13 doing kind of prep work for that film. 14 Q And what, if any, film was Mr. Depp 15 going to, at that point? 16 A Well, the plan, why we did the wedding 17 when we did it is because he had always had this 18 commitment to do Pirates 5, and he was going to 19 shoot that in Australia, and I was going to shoot 20 the Danish Girl. And I started the Danish Girl in 21 early February, and he was going to fly out mid 22 February to Australia. So his movie was going to</p>	<p style="text-align: right;">4489</p> <p>1 A It was about a 24-hour -- I think it's 2 about 24 hours. I could be mistaken on the exact 3 amount of time. But I remember it's quite a 4 distance from London. I was filming in London; he 5 was filming in Australia. Effectively you have to 6 fly 12 hours, stop, get on a different plane, and 7 fly, I think, around the same amount of time if 8 I'm not mistaken. 9 Q Okay. When you arrived -- before you 10 finished wrapping with Danish Girl and were 11 heading out shortly before, what, if any, 12 communications did you and Mr. Depp have? 13 A Well, at first it was great. Even 14 though we were separated, it was so hard to -- it 15 was so hard to leave, you know, leave right after 16 you get married, especially considering that in 17 Johnny and I's relationship, it was so much worse 18 when I went away to work. It just -- that's when 19 problems started. So that was hard, but we 20 communicated pretty consistently and it was 21 positive until it started to change. And I got 22 the sense that he thought I was sleeping with the</p>

<p style="text-align: right;">4490</p> <p>1 director and then it was with the – the actor I 2 was filming with. 3 Q Who was the actor you were filming 4 with? 5 A Eddie Redmayne. 6 Q Okay. 7 A Of course I – not, of course, I was 8 not. Not that it mattered. But, you know, I 9 could do my best to field the accusations, and 10 then they would kind of subside and I thought 11 things were okay. And then the day right before I 12 was supposed to fly to Australia, he, like, 13 right – I think it was the night before I was 14 supposed to leave to go to Australia, he calls my 15 hotel apparently. I had a sense that the phone 16 was ringing. I think I was in the shower at the 17 time. But not much time had passed, and I get a 18 knock on the door and it was someone from the 19 hotel that I was staying at. The hotel staff had 20 been sent up to the room because Johnny – 21 MS. VASQUEZ: Objection. Calls for 22 hearsay. And speculation.</p>	<p style="text-align: right;">4492</p> <p>1 reason to not be in the room, that I got a sense 2 was, you know, cheating or, you know, that I was 3 hiding something, and that was why I wasn't 4 answering the phone and hence why I got the knock 5 on the door. 6 Q Okay. 7 A That was right before I left. 8 Q So as you're heading -- before you 9 headed to Australia, what, if any, requests did 10 you make of Mr. Depp for him to get you MDMA? 11 A That's ridiculous. 12 Q Why is that ridiculous? 13 A Because I would never -- since that 14 time I learned my lesson the hard way on the plane 15 to Russia, I would never do MDMA with him. 16 That's -- I'm asking for a problem in that case. 17 Like, that, I would never do that. 18 Q Okay. So you flew to Australia and met 19 with Mr. Depp, right? And I'm going to -- 20 MS. BREDEHOFT: Can we pull up 21 Defendant's 1809. And, Your Honor, these are some 22 of the pictures that Mr. King, you may recall, was</p>
<p style="text-align: right;">4491</p> <p>1 THE COURT: I'll sustain the objection. 2 Q So don't tell what the staff said. 3 A Okay. 4 Q What happened next? 5 A Then I start communicating with Johnny. 6 Q And when you say "started," I mean, was 7 he on the phone? Did you call him? What happened 8 here? 9 A He called the room and then my cell 10 phone, and then once I was on the cell phone, he 11 was accusing me of not being in my room so he 12 called the room. And I had to prove that I was in 13 the room because, I don't know, by answering the 14 phone. And we had a lengthy, kind of circular 15 conversation about where I was and why I didn't 16 answer the phone – why I didn't answer the phone 17 immediately. He didn't sound like he was 18 connected to reality. It just didn't seem like – 19 to me, it seemed like a previous pattern. I was 20 unsure what to make of it because he wasn't right 21 in front of me, but he was accusing me of what it 22 seemed like as having, I guess, an affair or a</p>	<p style="text-align: right;">4493</p> <p>1 testifying earlier said he had on his phone. 2 THE COURT: Okay. 3 MS. BREDEHOFT: And then those were 4 given. 5 THE COURT: So I don't have these is 6 what you're saying? 7 MS. BREDEHOFT: Yes, Your Honor. 8 THE COURT: That's fine. 1809? 9 MS. BREDEHOFT: Correct. 10 Q I'm just going to show you a few 11 pictures, Amber. 12 Do you recognize -- and I realize you 13 didn't take this photo. 14 MS. BREDEHOFT: I'm going to move the 15 admission of it, though, Your Honor. 16 THE COURT: Any objection to 1809? 17 MS. VASQUEZ: No. Thank you, Your 18 Honor. 19 THE COURT: Okay. 1809 in evidence. 20 You can publish. 21 MS. BREDEHOFT: Okay. Let me pass this 22 up and hand the other side. Try to, given the</p>

4494	1 strangeness of this. May I approach, Your Honor? 2 THE COURT: Yes. Thank you. I 3 appreciate it. 4 Q Amber, do you recognize this photo? 5 A I do. 6 Q And could you tell the jury what this 7 is? 8 A That is the driveway leading up to the 9 house that Johnny was renting while shooting 10 Pirates 5. 11 Q Okay. And then I'm going to -- I'm 12 going to make this -- try to make it a little 13 faster, and I'm going to go to 1810. 14 THE COURT: Ms. Bredehopt, if you have 15 a series of photos -- 16 MS. BREDEHOFT: Yes. 17 THE COURT: -- if you want to show 18 counsel what they are, maybe we can get them 19 entered all together, and then you can just -- 20 MS. BREDEHOFT: Yes. 21 THE COURT: -- go on with your 22 questions.	4496	1 THE COURT: Make sure you look through 2 them all too. I just want to make sure because 3 I'll go ahead and read them into the record after 4 you have looked through them all. 5 MS. VASQUEZ: Thank you, Your Honor. 6 I've reviewed them. I have no objection to any of 7 these photographs. 8 THE COURT: So I'll enter into evidence 9 Defendant's 1804, 1805, 1806, 1807, 1808, 1810, 10 1811, 1812, 1814, 1815, 1816, 1817, 1819, 1820, 11 1821, 1825, 1827, 1828, 1829, 1830, 1831, 1834, 12 1835, 1837, 1838, 1839, 1840, 1841, and 1842. 13 Did I get them all? 14 MS. BREDEHOFT: I believe so. 15 THE COURT: I want to make sure more 16 than believe so. Is that all the evidence? 17 They're all in evidence. So as long as you're 18 going to be referencing those photos, we can keep 19 them on and you can publish them. 20 MS. BREDEHOFT: Thank you, Your Honor. 21 Appreciate it. 22 Q Whose home was this in Australia?
4495	1 MS. BREDEHOFT: Yes. In fact -- and 2 these are all, I will represent, ones that we got 3 from Mr. King. 4 THE COURT: All right. If you want to, 5 take a look at them. 6 MS. BREDEHOFT: Your Honor, if I may 7 just approach, I'll give you the whole stack. 8 THE COURT: Okay. That's fine. 9 MS. BREDEHOFT: You can keep that up if 10 you want. 11 Q By the way, Amber, do you see kangaroos 12 in there? 13 A When I was pulling up to the house, I 14 saw kangaroos as well. 15 Q This was a pretty big driveway? 16 A It was a pretty -- 17 MS. VASQUEZ: I don't have any 18 objection, sorry. 19 THE COURT: No objection to any of 20 them? 21 MS. VASQUEZ: Don't believe so, Your 22 Honor.	4497	1 A It was like a well-known sportsman, 2 like racing cars or something of that nature. 3 Q Okay. 4 MS. BREDEHOFT: Michelle, if you can 5 pull up 1810. 6 Q Is this another picture from that home? 7 A Yes. That looks like it's the view 8 from the bathroom. 9 Q Okay. 10 MS. BREDEHOFT: And then let's go, 11 Michelle, if you can pull up 1811. 12 Q Is that a picture of the home? 13 A That's the house, yes. 14 Q Okay. 15 MS. BREDEHOFT: And let's go to 1812. 16 Q And that's -- 17 A That's a view from the living room. It 18 opened into a lagoon. 19 Q Okay. And then let's look at 1813. I 20 guess that's just another view, a little over, of 21 the swimming pool, correct? 22 A Yes.

<p>4498</p> <p>1 Q Okay. And then let's do one more, 2 1814. This is inside the house? 3 A Yes. 4 Q Okay. If you can look to the back here 5 where I've got my -- I'm making some -- what, if 6 anything, is that back there? 7 A That's the kitchen. 8 Q And this is the dining room and this is 9 on the main level? 10 A What we're looking at is the dining 11 room table on the main level with the kitchen in 12 the background. 13 Q Okay. Thank you. 14 Now, I'm going to ask you to take this 15 jury through your experience. What happened in 16 Australia once you arrived there? 17 A Well, I was nervous because of the 18 conversations that I had with him before I left. 19 And then in transit, I stopped in Dubai and spoke 20 to him too. So I was a little nervous, but he 21 indicated to me that he wanted me to come. He 22 said, "I miss my wife," at the end of the phone</p>	<p>4500</p> <p>1 looking forward to having this kind of, you know, 2 our style at-home date. You know, we had just 3 been -- we're a married couple, and we hadn't seen 4 each other for basically a month after we married. 5 And I start dinner and am happy to see 6 him. And some point early in that evening, he 7 pulls out a bag of MDMA. I asked him what it was, 8 and he told me it was MDMA. And I was surprised 9 because at the time that was, you know, like, 10 there was no question mark as to how I would 11 respond to that, or so I thought. Like, what are 12 you -- why would you even think that that's okay? 13 He had already gotten clean and sober, 14 although it was, you know, touch and go. But, you 15 know, for the wedding, he was drinking Beck's. I 16 think at some point, he did have wine on the 17 island, but it wasn't an issue, just moved ahead. 18 So I was surprised that he would even pull out 19 this bag and well, frankly, not hide it from me. 20 And he kind of seemed to suggest that we should do 21 it together. I was like, "Absolutely not. Like, 22 I just got here. I just got here. I want to see</p>
<p>4499</p> <p>1 call that we had in the airport. I called him 2 from Dubai. And he -- he said, "I miss my wife. 3 I miss my wife." 4 I felt, okay, safe, you know. And I 5 missed him so much. That's all I wanted -- all I 6 wanted to do is see my new husband. I flew in. I 7 arrived early. I -- immediately, I walked into 8 the bedroom. I was so excited to see him, and he 9 was so -- like, he had lost a ton of weight. So I 10 just knew something was up. And he kind of 11 quickly, you know, kissed me and kind of -- you 12 know, we had some interaction. It was brief. He 13 was leaving to go work. He had to work that day. 14 But then after he -- the plan was he would come 15 back, which he did in the evening, and then he was 16 supposed to have a three-day weekend, a long 17 weekend. 18 So he comes back that evening, and the 19 chef had kind of prepared some things from the 20 fridge, mashed potatoes, I think spinach as well. 21 There were some steaks in the fridge, but he had 22 kind of prepped some of the sides. And I was</p>	<p>4501</p> <p>1 you. I want to spend time with you." And it was 2 the exact opposite of what I expected, what I 3 wanted, and it just seemed delusional at the time 4 to me that he would even suggest this to be 5 something that I could participate in with him. 6 If you had been through what I had been 7 through at that point, it's crazy. And at some 8 point, he drinks in front of me. At first I think 9 it was like a Malbec or wine or something, and I 10 remember we hadn't, like, it's -- it kind of 11 started an argument, and that was upstairs in that 12 room that we just looked at a picture of, you 13 know, by the sunflowers, that's more or less where 14 we were standing, just closer to the kitchen. 15 And we get in an argument and I shove 16 past him, just stomp off, and he grabs me. We had 17 an argument about me walking away. Am I walking 18 out of this? And in my head I was like -- I 19 actually wasn't thinking of leaving yet, but that 20 would later be going through my mind. 21 We had a brief interaction, and I 22 don't -- I don't remember the exact sequence of</p>

<p style="text-align: right;">4502</p> <p>1 things. I wish I did. I have a lot of flashes. 2 It gets a little bit more confusing for my ability 3 to recall everything in a linear way a little 4 later on as things got crazier. But for this 5 part, the first night, what I distinctly remember 6 is at one point, I don't think I had gotten very 7 far. Maybe I came back into the room, but he – 8 when he shoved me, I went flying across these 9 parquet floors, I mean just skidding across these 10 floors. And I remember thinking, "It just looks 11 so easy for him to throw me around like that," you 12 know. I – I just slid, screeching my skin 13 against this, like, beautiful wooden floor. 14 We had another argument that was a 15 spinoff from that. It was just kind of this on, 16 off, on, off kind of thing that I remember 17 eventually in this interaction, he shoves me up 18 against the fridge. He has me by the throat, and 19 he just was holding me there by my throat. And I 20 wondered if it was the drugs. I wondered if it 21 was him. It hadn't – in my recollection, hadn't 22 been that long. He has me up against the throat</p>	<p style="text-align: right;">4504</p> <p>1 so is really, really compromised at this point. 2 And I kept thinking that I just wanted to hear him 3 or know if he came in so I could be aware, so I 4 could be ready for what was going to come in with 5 him. 6 And at some point I go back downstairs. 7 I don't really know at what point I gave up and 8 stayed behind my barricaded door. But I managed 9 to go to sleep. I took some sleeping pills. I 10 woke up and when I came downstairs, he was still 11 up. He confirmed it when I asked him that he had 12 not slept. He had not eaten. So I tried to get 13 him to eat. We get into an argument. He was 14 accusing me of Eddie Redmayne, and by this point, 15 he thought I was working with Billy Bob Thornton 16 on the movie I just shot, but I had already worked 17 with him a year earlier. But he was very upset 18 about him and the gentleman that invited me to a 19 concert in London. You know, my costar, he was 20 upset about these people, even though I had done 21 that movie a year prior. 22 Q Who was that?</p>
<p style="text-align: right;">4503</p> <p>1 [sic], kind of bashing me up against the wall next 2 to the fridge. We're kind of moving in that area. 3 And at some point I'm in his face, and 4 he had – I don't know if he had let go of my neck 5 or loosened my [sic] grip, but I remember slapping 6 him across the face, screaming at him, screaming 7 at me. I got my hand free when he tried to grab 8 me when I walked off. I stormed off. I slammed 9 the door upstairs. I don't know if it was in that 10 instance or the later one where I eventually 11 barricaded the door. 12 You know, it couldn't – it wouldn't 13 stop him from coming in. You could come in the 14 other doors. You know, there's plenty – there's 15 a back door, the patio. But at least I'd hear it. 16 And my – this is March 2015 by this time. I'm 17 being medicated by his doctor. He's giving me 18 anti-anxiety meds, giving me – you know, had 19 already tried to give me antidepressants. They 20 didn't work for obvious reasons, I hope. I wasn't 21 sleeping. I had insomnia. I'd wake up with panic 22 attacks. I needed to sleep, but my ability to do</p>	<p style="text-align: right;">4505</p> <p>1 A It was Billy Bob Thornton, Jim 2 Sturgess, and Eddie Redmayne who he was upset 3 about. 4 Q Let me just stop you for a moment. 5 Have seen Mr. Depp take any drugs by this point? 6 A Oh, yeah. Sorry if I left that out, 7 that we really had the argument about the MDMA. 8 He suggested to me that it wasn't on the no-fly 9 list, like it was on the no list. That's what was 10 his argument -- that was his defense. This isn't 11 on -- "You didn't say I couldn't have this." And 12 I'm -- you know, over and over again, Johnny told 13 me I wasn't the reason he was getting sober, but I 14 was the reason he was staying sober. I saved his 15 life and all this stuff. It wasn't like it was 16 my -- it wasn't my job to police him, but I kind 17 of ended up being in that situation, it seemed 18 like, in his mind, you know, when he would express 19 that to me. 20 So he took the -- a handful of pills, 21 and I didn't count how many, but when I came back 22 downstairs, I did the math on the amount that was</p>

<p style="text-align: right;">4506</p> <p>1 left, and I think it was either eight or ten, I 2 can't recall as I sit here now, either eight or 3 ten pills of MDMA. 4 Q That he had taken or that were left? 5 A I don't know. I remember we had a 6 conversation about the amount that he took. So I 7 remember saying "You" – 8 MS. VASQUEZ: Objection. Hearsay. 9 THE COURT: I'll sustain the objection. 10 A There were only a few left in the bag, 11 so I think it was what he took. And I said, 12 "Johnny, that" – 13 MS. VASQUEZ: Objection. Hearsay. 14 A He confirmed that he took that amount 15 and that he could take that amount. 16 Q And what amount? 17 A At this point, there were ten – he had 18 taken ten. Eight or ten, I can't recall. 19 Q And when you say "at this point," is 20 that the first night? Is that the second day? 21 A This is the second day. This is after 22 I had already fallen asleep for the night in the</p>	<p style="text-align: right;">4508</p> <p>1 to one another. I don't know how else to describe 2 it because we never had any sort of direct 3 interaction that was negative. We never had any 4 sort of confrontation or anything. But I did my 5 best to explain to him what I could answer to that 6 accusation. 7 And at one point he – oh, I mentioned 8 that – well, I can't say what I mentioned. He, 9 as a result of that phone call, picks up the phone 10 and calls his agent. I don't know why, still to 11 this day. He calls a few people. I don't know 12 who's on the other line; I just heard his side of 13 it, and he's screaming at them. I got a sense 14 that it was money, that he felt people had been 15 stealing money from him and that the studio had 16 been ripping him off and that he was calling 17 himself a, like a whore or he had been whored out. 18 Seemed like he was upset. But I did 19 not, at this point, this was maybe early evening; 20 it was before the sun went down on the second day. 21 I remember he took the phone at one point and 22 called my divorce attorney. I had, at some point</p>
<p style="text-align: right;">4507</p> <p>1 room upstairs, come back downstairs. He was still 2 awake. 3 Q Okay. Please continue with that second 4 day. 5 A He was accusing me of being mean to his 6 sister. He was accusing me of not liking his 7 sister, something about the wedding. I was trying 8 to put out that fire, as you will. I was trying 9 to say, "No, no, no. First of all I'm not filming 10 with Billy Bob. No, I wasn't filming with Jim 11 Sturgess. Yes, I filmed with Eddie Redmayne, but 12 he was lovely, a gentleman." 13 MS. VASQUEZ: Objection, Your Honor. 14 Hearsay. 15 MS. BREDEHOFT: That's not offered for 16 the truth of the matter. 17 THE COURT: Overruled. 18 MS. BREDEHOFT: Thank you. 19 A Yes. And then when it came up with his 20 sister, he was accusing me of kind of having this 21 animosity with Christi. I tried to defend myself, 22 explaining why her and I had kind of become cold</p>	<p style="text-align: right;">4509</p> <p>1 prior to this, got a divorce attorney -- not a 2 divorce attorney, a domestic relations attorney to 3 do a postnup because we got married in February, 4 and there wasn't -- there was never any mention or 5 talk from Johnny about a prenup. But I had had 6 interactions with his sister, and so I thought, 7 "Okay, I'll get a lawyer, and let's do a postnup." 8 When Johnny found out about that, or 9 when I reminded him of that in Australia, he went 10 outside and called my divorce attorney and fired 11 her and said the only way out of this was death, 12 again, and I heard that already at this point, 13 March 2015, probably 25 times. 14 So he's screaming at her. He calls his 15 agents. I hear him talking incoherently -- 16 screaming incoherently at my lawyer and his agent. 17 He comes back inside, and I genuinely didn't know 18 if he was still mad at me or if it was about me at 19 all. I didn't know. It didn't seem like it was 20 connected to reality at all. 21 At some point shortly after that, I 22 have been saying to Johnny, "You need to sleep,</p>

<p style="text-align: right;">4510</p> <p>1 let's eat some dinner, baby, let's relax. Please, 2 like, calm down." In my head I was thinking that 3 it would genuinely change if he just got some 4 sleep. He needed to sleep it off. He needed to 5 come down off the drugs. Clearly the combination 6 of what he had taken pill-wise with whatever else 7 he was hiding from me was not good. 8 I had recognized that sort of delusion. 9 I'd recognized that sort of unattached-to-reality 10 rage. I had recognized the patterns of those kind 11 of loops where he's yelling about things that 12 aren't even being discussed or talked about. I 13 knew already that he just needed to sleep it off, 14 clean up, you know, sober up. And I thought we 15 could. I put -- I remember I went to the fridge. 16 I got out the steaks so that they would, you know, 17 be ready to cook, and I got out some of the food I 18 was going to put together for dinner. I went 19 upstairs. I don't know if I came back down in my 20 nightgown at that point or if that was shortly 21 after, but the next thing I remember is coming 22 downstairs and looking for him.</p>	<p style="text-align: right;">4512</p> <p>1 of the violence actually even initiated, but then 2 he had me up against the wall. I remember this 3 time he slams me up against the wall hard. I 4 mean, I hit my head hard. And this is a wall next 5 to the -- I say kitchenette, but it's more of a 6 bar. 7 I remember there were these cooling 8 fridges, and I remember kind of being slammed up 9 against those. I remember pushing him off of me. 10 I remember the name-calling, the whore, the slut, 11 the fat ass. I remember a lot of name-calling. 12 I said -- 13 Q Had he been drinking by this time? 14 A He was drinking -- 15 MS. VASQUEZ: Calls for speculation. 16 Leading. 17 THE COURT: I'll sustain as to leading. 18 Q What, if any, drinks had you observed 19 Mr. Depp have by this time? 20 A Well, I had already seen him drink. 21 Right in front of me, took a big swig out of a 22 wine bottle upstairs, right in front of me as a</p>
<p style="text-align: right;">4511</p> <p>1 We had an interaction that I can't 2 really describe. It didn't make a lot of sense to 3 me. He was just belligerent. Belligerent, 4 throwing things, screaming at me. And I realized 5 I was back on the chopping block. I realized it 6 was back. I realized that the arrows were pointed 7 at me again. And I tried to defend myself. I was 8 explaining, you know, trying to say that -- 9 MS. VASQUEZ: Objection, Your Honor. 10 Hearsay. 11 MS. BREDEHOFT: Not offered for the 12 truth of the matter. She hasn't even said it yet. 13 Q But try not to say what you're saying 14 unless it needs it for context or something. Try 15 to say what he's saying. 16 THE COURT: I'll sustain the objection. 17 MS. BREDEHOFT: Okay. 18 A He was just belligerent. I don't know 19 how to describe to you because it wasn't making 20 sense. It wasn't making sense. 21 I don't know how -- I don't know how 22 the immediate next, like, string of the next part</p>	<p style="text-align: right;">4513</p> <p>1 gesture of -- like, looked right at me and took a 2 big swig out of it as a, you know, like a show 3 of -- you know, did it right in my face to make a 4 point. And then when I came downstairs, he was 5 drinking from the bottle. I don't -- I don't know 6 what kind of liquor. I remember there was another 7 bottle open, and I was wondering why was he 8 drinking both. 9 But at some point, he had me up against 10 this -- the wall next to the cooling fridges, and 11 I remember slamming my head up against the thing. 12 He had me by the neck, squeezing my neck, and it 13 got really -- it got really nasty. It went from 14 like, "Oh, no one likes you. No one likes me. 15 Everyone warned me about you." 16 That's what it was. He started to tell 17 me that everyone had warned him about me and that 18 he wished he had never married me, wished he had 19 never met me. No one liked me. You know, it 20 sounds childish, but I remember feeling really 21 hurt. And then at some point, I shove him hard to 22 get him off me, and he shoved me back and he said,</p>

<p style="text-align: right;">4514</p> <p>1 "Do you want to go, little girl?" 2 That, I couldn't, as I sit here today, 3 tell you if that happened before he choked me up 4 against the wall, but at some point, I am in a, 5 like, a struggle with him where I'm holding his 6 shirt, lapel, and he kind of just flings me, for 7 lack of a better way to describe it, throws me 8 across the room. I land on the – a games table, 9 like a ping-pong table. And I don't know if I was 10 holding on to him or if he pursued me separate. 11 But he gets on top of me on the games table, and 12 he was just whacking me in the face, like, 13 repetitive. 14 We struggle on the games table. I 15 don't know – I don't know how we get up. I don't 16 know if he pulls me up. I wish I could tell you. 17 But we were in this struggle down in this – this 18 games room by the bar, and we had this 19 conversation about the drinking or argument about 20 the drinking and he holds up this bottle to me, 21 and I'm saying, "Did you drink this whole thing?" 22 Something stupid, focusing on this detail, and he</p>	<p style="text-align: right;">4516</p> <p>1 floor, I stand up, he's got a bottle in his hand, 2 and he threw it at me. It missed, thankfully, but 3 I kind of pulled myself back into the bar area. I 4 don't know how much time passed, but at some 5 point, he had a broken bottle up against my 6 face/neck area, by my jawline, and he told me he'd 7 carve up my face. 8 I don't know at what point in the 9 evening, I couldn't tell you what, sequence-wise, 10 when that happened, but it was terrifying. It 11 wasn't the first time he said that to me. He said 12 that to me on the plane as well. But this time he 13 was holding a broken bottle to me. 14 I honestly don't remember if I threw 15 anything in his direction. I don't think I did. 16 I just remember him having me by the nightgown. I 17 remember him flailing me, throwing me around. I'm 18 flailing. This is after there were some bottles 19 broken on the floor. This is actually after, 20 again, forgive me. I wish I could remember the 21 sequence, but it's flashes. He's throwing these 22 bottles at me. I remember retreating -- there</p>
<p style="text-align: right;">4515</p> <p>1 is telling me that I can't control him anymore and 2 that if I really, you know, if I really wanted to, 3 try, take it. 4 And then he's, like, taunting me to 5 take the bottle from him. If I really – if I 6 really want him to stop, why don't I take it from 7 him? Go on, go on. He kept saying, "Go on," and 8 kind of gesturing with the bottle towards me. 9 And, like, he does that two or three times. I 10 reach for it, and he'd revoke it, kind of laugh at 11 me. And he's holding out the bottle. I think, 12 like, maybe the third time or so I get hold of it. 13 I pick it up and I slam it down on the ground, 14 right in between us. It's a tile floor, white 15 tile floor, and I smashed the bottle on the floor. 16 And that really set him off. So stupid. Sorry. 17 And he's – it was like a light bulb switch went 18 off. And he starts screaming. 19 I don't know if he backhanded me or hit 20 me normally. I don't really recall, but I 21 remember it sent me down to the ground. I 22 remember by the time I picked myself off the</p>	<p style="text-align: right;">4517</p> <p>1 were also cans, like soda cans, beer or soda cans, 2 and they're coming at me one after the other. And 3 I keep pulling myself into the bar area, there's 4 like a bar behind me in, like, an L shape. 5 He's standing in the only way you can 6 exit from, so I'm kind of trapped in front of the 7 sink surrounded by bar on three sides with him in 8 front of me-ish, kind of off to the left. And 9 he's throwing these bottles one after the other, 10 and I could feel glass breaking behind me. I 11 remember feeling one of them go by my head really 12 fast, like a real velocity. I remember being 13 terrified. I remember I couldn't move. I 14 couldn't go anywhere. 15 I eventually – I'm trying to – I 16 don't know if he ran out of things to throw. I 17 think that's how I moved myself toward the exit, 18 and I believe that's most likely when we got kind 19 of in this struggle by the bar area. Because I 20 remember my feet slipping on the tile as he was 21 slamming me from the wall to the countertops. At 22 one point, he has me up against the wall and he's</p>

<p style="text-align: right;">4518</p> <p>1 punching the wall. He had my, you know, nightgown 2 and kind of ripped it off my chest. 3 I remember at one point, he's teasing 4 me, he's taunting me. He has my breast in his 5 hand. My nightgown came completely off. It was 6 ripped off of me, so I was naked. I was slipping 7 around on this tile and trying to get my footing. 8 I just remember slipping on this tile. Glass was 9 underneath me, and I remember just trying to get 10 my footing, you know. I felt really destabilized, 11 and I felt really vulnerable and naked. 12 He threw me around, and at some point, 13 I'm up against the wall and he's screaming at me 14 that he fucking hates me, that I ruined his life. 15 I remember that I ruined his life, over and over. 16 Then he starts punching the wall next to my head, 17 holding me by the neck. I get free from him. I 18 kind of step back from him, and it's like his 19 energy shifted to the phone. There was a 20 wall-mounted phone on the wall next to where my 21 head was. And he went from punching the wall to, 22 like, realizing there's a phone there, and he</p>	<p style="text-align: right;">4520</p> <p>1 I'm on the countertop, and he had me by 2 the neck, and he felt like he was on top of me. 3 And I'm looking at his -- in his eyes, and I don't 4 see him anymore. I don't see him anymore. It 5 wasn't him. It was black. I've never been so 6 scared in my life. It was black. I couldn't see 7 him. And he was looking at me, and I was trying 8 to get through to him. I was trying to say to him 9 in some way that it was me. I was trying to get 10 through to Johnny, and I couldn't see him. I 11 couldn't see him at all. And my head was bashing 12 against the back of the bar, and I couldn't 13 breathe. 14 And I remember trying to get up and I 15 was slipping on the glass, my feet were slipping, 16 my arms were slipping on the countertop. I 17 remember just trying to get up so I could tell him 18 that he was really hurting me. I didn't think he 19 knew what he was doing. I don't know how -- 20 sorry. I'm sorry. I couldn't breathe. I 21 don't -- I didn't want to do this. I didn't want 22 to do this. I mean, I couldn't -- I couldn't</p>
<p style="text-align: right;">4519</p> <p>1 picked up the phone and he's screaming. 2 He said (demonstrating), like, at the 3 top of his lungs, screaming, "I fucking hate you. 4 I fucking hate you. You ruined my fucking life," 5 and screaming at the top of his lungs, picks up 6 the phone and starts bashing the phone against the 7 wall, against the wall like where I was just being 8 held. And I remember kind of having some distance 9 on what was happening and watching him do this, 10 and it was like his energy had shifted and I was 11 that phone all of a sudden. 12 And he was just over and over again, 13 smashing this phone into the wall, over and over 14 again screaming at me, and I was watching the 15 phone every single time he pulled his hand back, 16 it was just breaking into pieces. I remember 17 thinking, "This phone is disappearing. He's 18 smashing it to smithereens, just going into the 19 wall." 20 And at some point he's on top of me, no 21 phone, but screaming the same thing. "I fucking 22 hate you. You ruined my fucking life."</p>	<p style="text-align: right;">4521</p> <p>1 breathe. I couldn't get through to him. I 2 couldn't -- I couldn't get up. I couldn't get up. 3 And I don't know how that ended. I 4 don't know -- I don't know how -- I don't know 5 what happened next. I think when I -- the next 6 thing I remember, I was bent over backwards on the 7 bar, meaning my chest was up. I was staring at 8 the blue lights, and my chest was on this -- my 9 back was on the (indiscernible), and I felt he was 10 punching me. He was -- I'm sorry. He was -- I 11 felt this pressure. I felt this pressure. 12 (Indiscernible) he was punching me. 13 I could feel his arm moving, and it 14 looked like he was punching me. I could just feel 15 this pressure. I was thinking I didn't know if I 16 was feeling pain, it was just the pressure in my 17 pubic bone. I don't know. I don't remember what 18 I said. I just remember being really still, not 19 wanting to move. I remember looking around the 20 room. I remember looking at all the broken 21 bottles, broken glass. And I remember just not 22 wanting to move because I didn't know if it was</p>

<p style="text-align: right;">4522</p> <p>1 broken. I didn't know if the bottle that he had 2 inside me was broken. I couldn't feel it. I 3 couldn't feel it. I didn't feel pain. I didn't 4 feel pain. I didn't feel anything. I just -- I 5 didn't want it. I didn't -- I looked around, and 6 I saw so much broken glass that I didn't know. I 7 didn't know if he would know -- I didn't know if 8 he would know if it was broken or not. 9 And I just remember thinking, "Please, 10 God, please, I hope it's not broken." I don't 11 know how that ended. I don't know how I got off 12 the countertop. I just remember being in the 13 bathroom. I remember retching. I remember the 14 sound my voice was making. I remember I lost 15 control of my bladder. I remember just retching. 16 I remember there was blood on the floor. I got up 17 some way. I don't know how that night ended. I 18 don't remember what happened. I don't remember. 19 I have a memory of him begging me not 20 to leave. I remember going outside the front 21 door. I remember him coming out to the front 22 area, but I don't remember if that was before or</p>	<p style="text-align: right;">4524</p> <p>1 thought it was from my arms or feet, but it was 2 drips. So that, plus the wall writing, I saw the 3 brown letters on the wall and then realized that 4 he was trying -- that that was meant to be a 5 message, but it was incoherent. I saw what looked 6 like my name, but I really couldn't make out most 7 of the rest of the message, walking down the 8 stairs. 9 I saw a bird in the house, which was 10 surreal. I went down to the main level where my 11 painting studio was and I had some canvasses out. 12 And that was in the living room area. And oh, by 13 the time I got down to the bottom of the stairs, 14 the dried blood had been kind of taken over by a 15 paint. It was blue, navy blue paint, and then 16 brown paint. And then it was, you know, on the 17 walls, on the lamp shades, pillow cases of the 18 sofa, the sofa cushions. There was blood. 19 In the painting studio, the paint -- my 20 canvas had been covered with what looked like just 21 brown, blue, green, red mess. It was just a mess. 22 There was a painting that had -- you know a</p>
<p style="text-align: right;">4523</p> <p>1 after this. I don't remember. I just have that 2 memory. I remember taking a bunch of sleeping 3 pills -- not a bunch, like, two, which is a lot 4 for me. I remember falling asleep or -- I don't 5 remember falling asleep, but I know I fell asleep 6 because I woke up the next day. I assume it was 7 late morning. 8 I could hear him downstairs. I could 9 hear Marilyn Manson music, not in person, I could 10 hear the music. Maybe he said it was Marilyn, or 11 maybe I could recognize, I don't remember. But I 12 became aware that's what I was hearing. It was 13 blaring. It came clear, obvious to me when I 14 walked downstairs that he was still up, hadn't 15 gone to sleep again. I walked downstairs, and I 16 saw this brown on the walls, going down the 17 stairs, and the brown on the walls became clear, 18 like, it became clear, like lettering. And then 19 it was obvious it was dry blood. 20 He had written down the stair, spiral 21 staircase, like white cream walls. There's blood 22 on the carpet. I could see blood drips. I</p>	<p style="text-align: right;">4525</p> <p>1 painting that the owners had that had, you know, 2 like giant penis on it, and you know, some other 3 things, like a table overturned, a bunch of broken 4 glass on that -- on that floor. 5 I walked downstairs where I heard the 6 music coming from, and that's where I found him 7 blaring his music. He was in the study, which is 8 in the -- by the bar, games table area off to the 9 side, and it was just glass and blood and broken 10 windows and -- a broken window, and just it looked 11 like a mess. The table was collapsed, and I 12 walked into the study. There was a couple 13 unbroken empty bottles. I remember wondering 14 where they came from. 15 And he just looked -- wasn't there 16 anymore. He wasn't there. It wasn't Johnny. He 17 was standing at the office desk. He had his hand 18 wrapped in this, like, rags or, you know, bandanna 19 rags, and I think he took them down or somehow 20 showed me, and he said, "Look what you made me do. 21 I did this for you," something to that effect. 22 And I kind of put together it was</p>

<p style="text-align: right;">4526</p> <p>1 covered in paint, and I put together that that's, 2 like, he was using his finger. I quickly became 3 aware that that's what he was using as a 4 paintbrush, even though there was lots of paint 5 brushes around. And we didn't have any sort of 6 coherent conversation, as you can imagine. 7 I figured out he was missing a finger. 8 He sort of held it up, and I said, "What did you 9 do? What did you do? When?" I realized in my 10 head that there had been many hours since this 11 probably happened, assuming that that was what 12 happened with the phone. And in any case, I knew 13 it had been way too long that he had had this 14 blood -- you know, that he was bleeding, and I 15 said, "I'm going to call 911 if you don't call 16 Jerry now." I don't -- I still don't recall which 17 of us called Jerry Judge, his security. 18 At some point we went upstairs. He 19 came upstairs, but he went up to the third floor 20 while I was in the main floor, the entry-level 21 floor. I went to make him a cup of coffee because 22 he was demanding more Red Bull, and I was</p>	<p style="text-align: right;">4528</p> <p>1 him -- it was how it looked; it was like 2 corralling a wild animal -- back into the house 3 with, you know, with his penis still out of his 4 pants, peeing or trying to pee. 5 That's what he was indicating, and he 6 went to the wall of the house. And I remember him 7 standing at the wall, trying to leave me more -- 8 saying he was gonna -- he had more information for 9 me. He was going to leave me more message -- more 10 messages, more information for me. It made no 11 sense. 12 And Jerry Judge, his security, and one 13 of the nurses, shortly after, I think they put me 14 in the theater room, but shortly after I remember 15 talking to one of the nurses, and she was trying 16 to give me drugs to sedate me. 17 MS. VASQUEZ: Objection, Your Honor. 18 Hearsay. 19 MS. BREDEHOFT: Trying to give her 20 drugs. She didn't saying any -- 21 THE COURT: Overruled. 22 MS. BREDEHOFT: Thank you. Keep going.</p>
<p style="text-align: right;">4527</p> <p>1 thinking, "That's probably not a good idea." I 2 don't know why coffee would be so much better, but 3 in my head it was. I thought maybe it would sober 4 him up. I don't know. Help was coming though. 5 I remember I made him coffee. As soon 6 as I handed it to him, he threw it at the TV and 7 started screaming again. It was like back to -- 8 back to square one. Shortly after that, security 9 arrives. I don't know how long, maybe a few 10 second or minutes went by, not long, but they kind 11 of find Johnny, or Johnny finds them walking out 12 of the front door. And they were trying to figure 13 out what was going on. 14 And as they were kind of looking at him 15 and I and trying to figure out what the heck was 16 going on, Johnny took his penis out of his pants 17 and started peeing -- trying to pee or peeing 18 outside of the house, saying he had more messages 19 for me. And this was kind of in front of 20 security, and they kind of just, like, looked at 21 each other, looked at him and not laughed but kind 22 of half, you know, played it off and corralled</p>	<p style="text-align: right;">4529</p> <p>1 A And I just remember crying and 2 rejecting what they were trying to give me and 3 fighting with them about how much they were trying 4 to give me. I felt like I needed to figure out 5 what was happening with my life, what was 6 happening with Johnny. I didn't know if he was 7 okay. I didn't know -- I actually had no idea, 8 like, could this be something he could die from? 9 If anything, just the drugs and the alcohol, I 10 mean, that alone, I didn't -- I just remember 11 being scared and being in the theater room, this 12 dark theater room, and not knowing what the heck 13 was going on. 14 And I eventually was taken up to my 15 room by one of the nurses, and they -- I'm sorry, 16 Debbie, and or suggesting I go up to my room. I 17 went up to my room, and I took a quarter of what 18 she was trying to get me to take, and I eventually 19 fell asleep. I came back downstairs to look for 20 my phone, which Johnny had picked up before 21 security came in. He picked up my phone and said, 22 "We're going to get to the bottom of this."</p>

<p style="text-align: right;">4530</p> <p>1 Now, he wasn't making any sense at the 2 time. Understandably, just different. Nothing 3 made sense. But he picked up my phone and said, 4 "We're going to get to the -- I'm going to prove 5 this. We're going to get to this. We're going to 6 get to the proof of this," something like that. I 7 don't remember exact words, and he pushed record 8 on my phone. I didn't actually at the time think 9 that he had done that. I had no idea.</p> <p>10 But I did know that I didn't have my 11 phone when I woke up and I went downstairs to get 12 it. He was on the dining room table by where 13 Jerry Judge as sitting. Jerry Judge was on the 14 phone and talked to me, and I went back up to bed, 15 took more of this sedative and fell asleep, and 16 then I think the next day went to the closet and 17 took out the clothes that he hadn't painted on. I 18 guess when he went back upstairs, he had, like, 19 looked like what he had done is dip his hand in a 20 bucket of paint and just wiped it on my clothes.</p> <p>21 And he had picked up another portion of 22 my clothes and put them in the bathtub. I don't</p>	<p style="text-align: right;">4532</p> <p>1 Q Do you recall what color it was?</p> <p>2 A Well, I believe it was white -- I mean, 3 clear. But I can't be certain. I think it was 4 clear.</p> <p>5 Q Do you remember whether it had a handle 6 on it or not?</p> <p>7 A No. It was a normal bottle. Like, I 8 remember because he was holding it like this and 9 gestured to me to take it. And I did try to reach 10 for the bottle. It was a normal size, but for the 11 life of me, I can't remember, like, what brand.</p> <p>12 Q Okay. When you woke up that third 13 morning and came out of your room, what, if any, 14 food did you see?</p> <p>15 A Oh, yeah, I forgot about that.</p> <p>16 MS. VASQUEZ: Objection, Your Honor. 17 Leading.</p> <p>18 THE COURT: Overruled.</p> <p>19 A There was mashed potatoes smeared all 20 over the bedroom door and on the wall in various 21 places. But I remember opening the door and being 22 really confused at first as to what it was. It</p>
<p style="text-align: right;">4531</p> <p>1 know if he added paint or if he just had touched 2 them with paint. But there was this ugly, navy 3 blue, brown paint. I packed what was packable, 4 well, hadn't been destroyed, and eventually left 5 Australia with Ben King, who you met. On the way 6 there --</p> <p>7 Q Let me stop you there because I want to 8 ask you more questions about those three days, and 9 then we can talk about Ben King and going home.</p> <p>10 So do you recall what bottle Mr. Depp 11 was drinking from and then had the back-and-forth 12 with you and you threw on the ground?</p> <p>13 MS. VASQUEZ: Objection, Your Honor. 14 Compound. Leading.</p> <p>15 THE COURT: Sustained.</p> <p>16 Q Do you recall what the bottle was?</p> <p>17 A No, I don't.</p> <p>18 Q Do you recall whether it was wine or 19 liquor?</p> <p>20 A It was liquor.</p> <p>21 Q Do you recall --</p> <p>22 A Because the wine was upstairs.</p>	<p style="text-align: right;">4533</p> <p>1 had little specks of green in it I assume to be 2 spinach. And throughout the house, there was food 3 rubbed in places, just countertops, walls, doors, 4 as I mentioned.</p> <p>5 And later that evening, I found the raw 6 meat that I had left out, the steak, all over the 7 house, there were pieces of it. It was cut up. 8 And he had ripped my nightgown into pieces, into 9 shreds and wrapped the meat up, like, wrapped the 10 steak pieces up with my nightgown. It was this 11 beautiful burgundy silk nightgown that had this 12 black lace trim. I ironically got it from 13 Dr. Kipper for a wedding gift. And it was 14 wrapped -- I found it -- I continued to find it 15 throughout the rest of the time I was in the house 16 in Australia. There were pieces of it in the 17 microwave, pieces of it in the produce drawer, in 18 the closet drawer. I mean, just raw, raw meat 19 wrapped up in my nightgown as well as the smeared 20 food on the walls. It was bizarre, to put it 21 mildly.</p> <p>22 Q What, if anything, do you recall seeing</p>

4534	1 on any mirrors? 2 A Oh, he had written on the bathroom 3 mirrors, in the bedroom. And I believe -- there 4 was another mirror. I just don't recall which 5 bathroom it was in. I suppose it was the one that 6 I went to which was on the very bottom level where 7 I was retching, for lack of a better way to 8 describe it. I think it was in that bathroom that 9 he also wrote on that mirror as well. 10 Q What, if anything, do you recall -- 11 A In blood and paint. I'm sorry. 12 Q I'm sorry. What, if anything, do you 13 recall any lampshade being written on? 14 A Well, messages to me, you know, things 15 to the effect of "Go getter," you know, "whore," 16 sort of things, that sort of language. But 17 calling me easy, calling me a slut, calling me, 18 you know, just things about ego and what a whore I 19 was. But it was hard to make sense of it because 20 it was clear he was just out of his mind. I mean, 21 he wrote on the back of a pillow in blood. You 22 can tell because it dries, like, in this ugly	4536	1 He said, "I'll fucking kill you." 2 Q Did you bleed from the vagina as well? 3 A I did. 4 Q And did you experience any pain later? 5 A I didn't -- I wasn't thinking about 6 that. I was heartbroken. Eventually, I realized 7 that I could be hurt because I was bleeding. But 8 I -- I convinced myself it wasn't broken and that 9 I -- that the bottle wasn't broken or else it 10 would be a lot worse, and the discomfort I was 11 feeling afterwards just paled in comparison to how 12 scared, shocked, I was. I'm scared. I just 13 married this man. I just married him. 14 Q And forgive me for asking this, but I 15 need to just make sure the record's clear. You 16 were penetrated up the vagina into the pubic bone; 17 is that correct? 18 MS. VASQUEZ: Objection, Your Honor. 19 Leading. 20 THE COURT: Sustained. 21 Q What, if any, penetration was there in 22 your vagina with the bottle?
4535	1 brown color. He wrote on the walls going 2 downstairs. 3 It took on -- in fact, you could see 4 where he -- it looked like he had run out of blood 5 because the messages became -- the markings became 6 clearly letters, and the letters kind of became, 7 like, I could see where he had clearly run out of 8 blood or it wasn't bleeding enough and went and 9 got paint and then it became paint and blood. You 10 could see both. You could see where he went back 11 with it, same with the mirrors. I could see where 12 all the dried blood was, and then I could see a 13 different set of markings with paint and some 14 other material. 15 Q So I'm going to go back to the time in 16 the bar, and I know this is very painful. 17 Do you recall what Mr. Depp was saying 18 to you when he had the bottle and was pushing it 19 against your pubic bone? 20 A He said that he would fucking kill me. 21 He said, "I'll fucking kill you." 22 He said it to me over and over again.	4537	1 A I can't believe I have to do that. 2 Q I'm so sorry. I'm so sorry. 3 A Johnny had the bottle inside of me and 4 was shoving it inside of me over and over again. 5 Q Did you experience any cuts on other 6 parts of your body? 7 A My forearms were cut. My bottoms of my 8 feet were sliced up pretty good. 9 Q Did you have any other bruising or 10 swelling? 11 A I had a bruise across my jaw, I 12 suppose, from the -- one of the many times he 13 clocked me in the face downstairs. I think -- I 14 think I just didn't make a record of any -- 15 anything else. 16 Q I'm going to ask you to turn to -- 17 let's go to 1810 -- well, actually, let's go to 18 1815. 19 MS. BREDEHOFT: Michelle, if you can, 20 bring that up, Defendant's 1815. And I think 21 these are all in, Your Honor, so can we publish? 22 THE COURT: Yes, you can publish.

<p>4538</p> <p>1 Q Is this the game table?</p> <p>2 A Yes, it is.</p> <p>3 Q Okay. And is this -- based on your</p> <p>4 testimony, is this where you were -- were you on</p> <p>5 top of this table?</p> <p>6 A Yeah. He briefly got on top of me and</p> <p>7 was pushing on my throat, actually, at some point</p> <p>8 when I was on the table. I had forgotten about</p> <p>9 that. And this, though, looks like it is after a</p> <p>10 lot of the stuff was cleaned up because it didn't</p> <p>11 look quite like this.</p> <p>12 Q Okay. Did the table collapse?</p> <p>13 A Yes, it did.</p> <p>14 MS. VASQUEZ: Objection, Your Honor.</p> <p>15 Leading.</p> <p>16 THE COURT: Sustained.</p> <p>17 Q What, if anything, happened to the</p> <p>18 table?</p> <p>19 A The table collapsed underneath me when</p> <p>20 Johnny threw me into it and got a top of me or</p> <p>21 fell on top of me. I honestly don't know which</p> <p>22 one.</p>	<p>4540</p> <p>1 minute to respond because it's hard -- it took me</p> <p>2 a minute to respond because I had not remembered</p> <p>3 seeing the bottle that Johnny was using on me. I</p> <p>4 hadn't -- I didn't have a memory of seeing it, and</p> <p>5 this picture, I wasn't aware of until just the</p> <p>6 other day, yesterday -- the day before. And I</p> <p>7 felt my stomach tighten up, like I was going to be</p> <p>8 sick when I saw it. Because even though I didn't</p> <p>9 remember seeing the bottle, what I had remembered</p> <p>10 is a pressure, like something square, which is why</p> <p>11 I thought he was punching me because I feel -- I</p> <p>12 was feeling a square, something firm hitting me,</p> <p>13 like butting up against my pubic bone over and</p> <p>14 over again. I felt that pressure against my bone.</p> <p>15 It felt like a flat surface.</p> <p>16 But I -- when I realized it was an</p> <p>17 object or bottle and not his fist, which is what I</p> <p>18 thought, you know, because his arm, I could see</p> <p>19 his arm while he was holding me down, saying he</p> <p>20 was going to kill me, but I thought he was -- you</p> <p>21 know, his arm looked like he was punching me. And</p> <p>22 I hadn't seen this bottle. I didn't know. And</p>
<p>4539</p> <p>1 Q If we could look at 1816, please,</p> <p>2 Defendant's.</p> <p>3 Do you recognize this, what's depicted</p> <p>4 in this picture?</p> <p>5 A Yes.</p> <p>6 Q What is it?</p> <p>7 A Looks like the bottles that were by</p> <p>8 Johnny on the desk when I came up that last</p> <p>9 morning and he was still up, still drinking.</p> <p>10 Q If we could, go to Defendant's 1817.</p> <p>11 A The bottle shape, the bottle shape.</p> <p>12 Q I'm sorry. Go ahead.</p> <p>13 A I don't -- I have --</p> <p>14 MS. BREDEHOFT: Go back to 1816,</p> <p>15 please.</p> <p>16 MS. VASQUEZ: Your Honor, I'm confused.</p> <p>17 Is there a question?</p> <p>18 THE COURT: Do you want to ask a</p> <p>19 question?</p> <p>20 Q What more do you recall about the</p> <p>21 picture?</p> <p>22 A You had -- I'm sorry. It took me a</p>	<p>4541</p> <p>1 then this came out in Ben's evidence, because he</p> <p>2 didn't share it until this date of this trial.</p> <p>3 MS. VASQUEZ: Objection, Your Honor.</p> <p>4 THE COURT: Sustained.</p> <p>5 A And so I recognize it.</p> <p>6 Q Okay. All right. Now let's go to</p> <p>7 Defendant's 1817.</p> <p>8 Do you recognize this area or this</p> <p>9 picture?</p> <p>10 A Yes. It looks like one area of the</p> <p>11 bar. Obviously, this is sometime later because</p> <p>12 all the liquid is dried up. It was quite</p> <p>13 slippery. I was slipping all over that tile;</p> <p>14 that's how I know.</p> <p>15 Q Okay.</p> <p>16 A Looks like a lot of the glass has been</p> <p>17 cleaned up almost.</p> <p>18 Q Okay. And then let's go to 1818.</p> <p>19 Actually, I think --</p> <p>20 THE COURT: I'm sorry, which -- that's</p> <p>21 not in evidence.</p> <p>22 MS. BREDEHOFT: Yeah, that's a</p>

<p>4542</p> <p>1 duplicate. Let's go to 1819. My apologies. 2 THE COURT: Okay. 3 Q Do you recognize this? 4 A Yes, I do. 5 Q What is this? 6 A This is close to where my feet were 7 when I was dangling off the counter, when he had 8 me on the countertop by my neck. My feet were 9 slipping on the tile, and I just remember my 10 feet – I remember feeling glass underneath my 11 feet and slipping. I couldn't get up, couldn't 12 alleviate the pressure on my neck because he was 13 crushing me. That's around that – not around, 14 that's next to that. All the way at the end of 15 the picture is the bar where I was standing when 16 he was throwing bottles at me. 17 Q Can we go to 1820. 18 Do you recognize what's depicted here, 19 the area? 20 A Yes. That's – to the left would be 21 the – where the wall-mounted phone was, right to 22 the left of that. To the right of that is the</p>	<p>4544</p> <p>1 And do you recognize what's depicted in 2 this photo? 3 A Yes. That's the bar that I was just 4 talking about. 5 Q Okay. Now, I see a phone on the right 6 side. Is that the phone you were talking about? 7 A No, that's not. This is a wall-mounted 8 phone. That's a landline. 9 Q And you see straight ahead at the 10 very -- if you look straight ahead at the picture, 11 on the top part of that, it appears to be some 12 broken glass. 13 Do you recall -- what do you recall of 14 that? 15 A I recall more than just this window 16 being broken. This is one of the windows that he 17 broke when he was throwing things at me. My body 18 was standing in front of that little kitchen sink 19 you see at the end of the picture. I suppose 20 that's some of the glass I felt, though, on the 21 back of my arms, like when the window shattered. 22 Q Okay. Let's go to 1822.</p>
<p>4543</p> <p>1 little L-shaped bar that I was telling you about 2 where I was trapped. 3 Q And when you say "to the left of the 4 wall" -- 5 A I'm sorry. 6 Q -- what do you mean? Is it off the 7 picture or on the picture? 8 A So if you're looking at this picture, 9 imagine up and to the left at person height. It 10 was like a – I don't know if it was antique, but 11 kind of looked old-fashioned, like an 12 old-fashioned heavy – it looked heavy; I didn't 13 pick up the receiver. But it looked heavy when I 14 was watching it break, you know, it looked like 15 this really heavy glass, this really thick, heavy, 16 not plastic but, like, a BIC lighter, something 17 heavy material on it. That's my best guess. So 18 that would have been to the left, and then to the 19 right would have been the very end of the bar that 20 you just saw a picture of. 21 Q All right. Let's go to 1821, 22 Defendant's.</p>	<p>4545</p> <p>1 THE COURT: 1822, I don't have in 2 evidence. 1822 is not in evidence. 3 MS. BREDEHOFT: My apologies. That's 4 exactly why I just went over here. 5 Let's go to 1825, is that the next one, 6 Your Honor? 7 THE COURT: 1825 is in evidence. I'm 8 not sure if it's -- 9 MS. BREDEHOFT: Okay. 10 Q Do you recognize this picture? 11 A Yes. That's where Johnny was standing 12 when I found him the last morning – that morning. 13 It might have been, like, mid day. When I say 14 morning, it was after I woke up. It was certainly 15 not early morning. And he was standing at that 16 desk, behind the desk, with the Manson blaring 17 when I found him and told him that I was going to 18 call 911 if he didn't call Jerry. 19 Q If you look in this picture, there 20 appears to be a lampshade down below. 21 Do you recognize that lampshade down 22 below the table?</p>

<p style="text-align: right;">4546</p> <p>1 A That's one of the lampshades Johnny 2 wrote threats, or messages, to me on. 3 Q Okay. Then let's go to 1827. 4 Do you recognize this? 5 A Yes, I do. That's my painting studio. 6 So when I walked downstairs and saw all the blood 7 on the walls, I walked into this room first. 8 That's where the -- the stairs empty into this 9 room and kind of my painting area. And those are 10 the canvasses that he repainted. 11 Q And do you see, if you look by the 12 white, the white table-clothed table to the right 13 of that, do you see a lampshade there? 14 A Yes. I don't know if that's the same 15 lampshade or another one. 16 Q Okay. Then let's go to 1828. 17 And do you recognize what's in that 18 one? 19 A I do. Those are my -- were my 20 paintings that I don't know when he did that, if 21 it was before or after the writing on the walls, 22 but he just ruined them.</p>	<p style="text-align: right;">4548</p> <p>1 Q Okay. And then to the right side on 2 the other side of -- more to the right than the 3 one you already testified to, is that what that 4 picture looked like before? Or is that -- 5 MS. VASQUEZ: Objection. Leading. 6 Q What, if any, changes were there to 7 that picture? 8 A Well, the three canvasses were 9 portraits, so they looked similar to the one 10 that's in the center that I was doing of his 11 daughter. 12 Q Okay. And the white that's below, 13 what, if any, changes were there to that? The 14 white canvas that you see there. 15 A It just looks like the painting was -- 16 it looks like once he destroyed the -- 17 MS. VASQUEZ: Objection. Calls for 18 speculation. 19 THE COURT: All right. Sustained. 20 Q Was there anyone else in the house 21 besides Mr. Depp and you? 22 A Not that I know of, no. And no one was</p>
<p style="text-align: right;">4547</p> <p>1 Q So I just want to make sure. So the 2 painting canvas that's dark colored, there's two 3 of them there. 4 A Well, there's -- yeah, there's two or 5 three. And then there's a smaller one in the 6 center. And that was his daughter I was trying to 7 paint a portrait of, and that was untouched. 8 Q And then but just so we're clear, the 9 one directly in front of you, that looks like it's 10 just a lot of dark colors, was that dark colors 11 before or? 12 MS. VASQUEZ: Objection, Your Honor. 13 Leading. 14 MS. BREDEHOFT: I said, "Was that dark 15 colors before?" 16 THE COURT: I'll sustain the objection. 17 Q What, if any, change was there on that 18 canvas? 19 A Well, I'm a terrible painter, but I'm 20 not that bad. That wasn't my painting. That was 21 the start of a portrait, and he changed it 22 dramatically.</p>	<p style="text-align: right;">4549</p> <p>1 around. 2 Q Okay. Do you have any reason to 3 believe somebody other than Mr. Depp did this? 4 MS. VASQUEZ: Objection. Leading. 5 THE COURT: Sustained. 6 Q What, if any, reason do you believe 7 that Mr. Depp did this? 8 MS. VASQUEZ: Objection. 9 MS. BREDEHOFT: That was not -- what, 10 if any. 11 THE COURT: What's the objection. 12 MS. VASQUEZ: Leading. 13 THE COURT: No. I'll overrule that 14 objection. 15 MS. BREDEHOFT: Okay. Thank you. 16 A It was Johnny and I in the house over 17 the course of those three days, roughly, and there 18 might have been somebody, his assistant or 19 something, come on the first day or second day. I 20 can't recall. So for the majority of the -- I 21 mean for the entirety of what I've been describing 22 to you, it was Johnny and I in that house.</p>

<p>4550</p> <p>1 Q And did you do any of this? Did you 2 cause any of this damage? 3 A No. No. 4 Q I'm also going to -- take a look at the 5 white tablecloth to the right there. 6 A And, also, Johnny was covered in paint, 7 so to answer your question fully, that's also how 8 I know. 9 Q All right. So I'm also just going to 10 draw your attention to that white tablecloth over 11 there. Does it appear to have some paint on that 12 as well? 13 A Yes. There was paint all over the 14 place, to say it plainly. 15 Q Now, the painting that you indicated, 16 there was a large penis, I believe. Where was 17 that? 18 A I believe it was just -- like in you're 19 looking at this -- I believe it was on the wall, 20 almost right next to the painting directly center 21 that we're looking at. That's my best 22 recollection, but I can't be entirely sure.</p>	<p>4552</p> <p>1 A I didn't write anything on the mirrors. 2 I'm as confused as anyone in hearing that 3 testimony. 4 Q And based on looking at this area that 5 I have circled, is the black on top or underneath 6 the red? 7 MS. VASQUEZ: Objection, Your Honor. 8 Calls for speculation. Leading. 9 THE COURT: I'll sustain the objection. 10 You know what? This might be a good 11 time to take a break. Why don't we go ahead and 12 take our afternoon break? 13 Ladies and gentlemen, let's go ahead 14 and have our break. Do not discuss the testimony 15 with anybody, and don't do any outside research. 16 We'll come back here in 15 minutes. 17 (Whereupon, the jury exited the 18 courtroom and the following proceedings took 19 place.) 20 THE COURT: All right. So we'll come 21 back at 4:02, okay? 22 MS. BREDEHOFT: Thank you, Your Honor.</p>
<p>4551</p> <p>1 Q Okay. Let's go to 1828. 2 THE COURT: I think that was 1828. 3 MS. BREDEHOFT: Oh, 1829, my apologies. 4 Q And do you recognize this photo? 5 A Yes, I do. 6 Q And what was this? 7 A This is one of the lampshades that 8 Johnny chose as a medium to leave me messages in 9 blood and paint. 10 Q Okay. Let's go to 1830. 11 Do you recognize this? 12 A Yes. That's one of the bathroom 13 mirrors. 14 Q Okay. And if you could just look to 15 the left, and I'm going to go ahead and circle it 16 over here, you see red and black there; would you 17 agree? 18 A Yes. 19 Q Okay. And there were some questions 20 that were asked earlier about that red. 21 What, if anything, did you write on 22 this mirror?</p>	<p>4553</p> <p>1 THE COURT: All right. Thank you. 2 THE BAILIFF: All rise. 3 (Recess taken from 3:46 p.m. to 4 4:01 p.m.) 5 THE BAILIFF: All rise. Please be 6 seated and come to order. 7 THE COURT: Okay. All back? 8 MS. BREDEHOFT: Thank you, Your Honor. 9 THE COURT: All right. Before we get 10 the jury, I just want to see -- talking with 11 Sammy, is Friday, May 27th? We don't usually meet 12 on Fridays, but is that an okay day to have trial 13 on that Friday? It's the Friday before Memorial 14 Day. I want to check with the jury, but I want to 15 check with you first. That will actually be 16 closing argument day for anybody that wants to 17 know. So I want to make sure I keep track, but if 18 it's good with the jury, I just want to make sure 19 -- 20 MS. BREDEHOFT: That works for me, Your 21 Honor. 22 MS. VASQUEZ: Your Honor, may we</p>

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Conducted on May 5, 2022

59 (4554 to
4557)

4554	1 approach. 2 THE COURT: Okay. Sure. 3 (Sidebar.) 4 MS. VASQUEZ: So, Your Honor, perhaps 5 the witness misspoke, but she did say that 6 yesterday or the day before, she looked at some 7 photographs. I just wanted, on the record, that 8 clear instruction is given to her, especially in 9 light of the break that we're having, that she's 10 not supposed to be talking to the attorney about 11 her testimony. Perhaps she misspoke, but she did 12 say she looked -- 13 THE COURT: I assume she saw them 14 before she was on. 15 MS. BREDEHOFT: She did. She misspoke. 16 MS. VASQUEZ: At the end of the day 17 I'll do that again, but I don't need her 18 commenting on the evidence or evidentiary issues. 19 That's the second time it's happened. 20 MS. BREDEHOFT: I realize that, Your 21 Honor, but I can't talk to her. 22 THE COURT: I know you can't talk to	4556	1 Your next questions, ma'am. 2 MS. BREDEHOFT: Thank you, Your Honor. 3 Michelle, if you can bring back up 1830 for a 4 moment. 5 1830, I'm sorry. 6 BY MS. BREDEHOFT: 7 Q Amber, we were talking about this right 8 before the break. It still has my highlight. 9 Which color is underneath the other? 10 MS. VASQUEZ: Objection. Calls for 11 speculation. 12 Q Based on your perception, which color 13 is under -- 14 THE COURT: I'll sustain the objection. 15 MS. BREDEHOFT: All right. Let's do 16 this: Let's bring up Defendant's 375, which is 17 already into evidence. 18 I think I need to clear that highlight, 19 Your Honor, but I don't have the control on mine. 20 There we go. Thank you. 21 THE COURT: It's in the top right 22 corner if you need it, but that's fine.
4555	1 her, but you can tell her not to talk about 2 evidentiary issues. That's not her testimony. 3 MS. BREDEHOFT: Okay. 4 THE COURT: Don't you agree? 5 MS. VASQUEZ: Yes, Your Honor, and 6 that's why I wanted to raise -- 7 THE COURT: If you want to talk to her 8 about that right now real quick or something, I 9 just can't talk about things in front of the jury 10 that we discuss outside the jury, and there's a 11 reason we do things outside the jury's presence. 12 MS. BREDEHOFT: Okay. I'll go tell her 13 that right now. Thanks, Your Honor. 14 THE COURT: Okay. Thank you. 15 (Open court.) 16 THE COURT: All right. You ready for 17 the jury? 18 (Whereupon, the jury entered the 19 courtroom and the following proceedings took 20 place.) 21 THE COURT: All right. Thank you. 22 Have a seat.	4557	1 MS. BREDEHOFT: Thank you. There it 2 is. My menu was hidden. 3 Q Amber, I'm going to ask you to take a 4 look at -- this is a picture we saw earlier, and 5 do you see the area that's written in red here? 6 A Yes. 7 Q Okay. What, if anything, did you have 8 to do with the writing of that red? 9 A Nothing. 10 Q Before this trial, did you know who 11 Carly Simon was? 12 A I might have heard her music, but, no, 13 I didn't. 14 Q Okay. Did you know what songs Carly 15 Simon wrote or sang? 16 A No. You had to tell me. 17 Q Okay. Thank you. 18 All right. And then, if you can just 19 remember this picture, again, the red area there 20 that I've circled -- 21 A Uh-huh. 22 Q -- and then I'm going to ask Michelle

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4558	<p>1 to take this one down and put 1830 back up. And 2 I'm going to ask you to take a look at this. 3 Did you -- what, if anything, did you 4 do to this mirror with respect to the black or the 5 red? 6 A I didn't touch it. 7 Q Okay. And what, if any, pictures did 8 you take? 9 A I took a picture of the -- it was the 10 picture we had right before this is the one I took 11 because it was in the bathroom where I found my 12 clothes in the tub and stuff like that. 13 Q Okay. And that's -- let's go to 374, 14 please. 15 MS. BREDEHOFT: That's already in 16 evidence. 17 Q Is that this picture you're referring 18 to? 19 A Yes, it is. 20 Q Okay. And I'm sorry. I just want to 21 make sure that I understand. What else was in 22 this bathroom where this mirror was?</p>	4560	<p>1 A A few of my clothes with paint on them. 2 Q Okay. 3 A You can see them. I think that's what 4 I see in the corner of the mirror. 5 Q Okay. And then let's go to 377 for a 6 moment. 7 MS. BREDEHOFT: That was in evidence 8 already. 9 Q And do you recall seeing this picture 10 earlier? 11 A I do. 12 Q Okay. And now let's go to 1829, 13 please. 14 Does that appear to be the same 15 lampshade but in color? 16 A It does appear that it is. 17 Q Okay. Thank you. 18 All right. Now let's go through, I'm 19 going to ask you to take a look at 1834. 20 And what does this depict that you can 21 recall? 22 A That is the TV that Johnny threw the</p>
4559	<p>1 A The bathtub and another mirror, which 2 also had writing on it. The bathtub had a few of 3 my clothes in it and paint, and both of the two 4 mirrors were painted. I believe I took a picture 5 of both mirrors. 6 MS. BREDEHOFT: Okay. And then I'm 7 going to ask you, Michelle, if you can bring us 8 back to 1831. 9 Q And did you take this picture? 10 A No. 11 Q Okay. And do you see in the mirror 12 there, can you see the bathtub in the back there? 13 A Yes, I can. 14 Q Was that the bathtub you're referring 15 to? 16 A Yes, it is. 17 Q And that had your clothes in it? 18 MS. VASQUEZ: Objection. Leading. 19 THE COURT: Sustained. 20 MS. BREDEHOFT: I'm sorry. 21 Q What, if anything, did it have in the 22 bathtub?</p>	4561	<p>1 cup of coffee at. 2 Q Okay. And let's go to 1835. 3 And what does this depict? 4 A One of the sofas in the living room 5 next to the kitchen with blood on it. 6 Q Okay. And then let's go to 1837. And 7 what does this depict? 8 A It's one of the guest bedrooms with 9 Johnny's iPad on the bed and blood and/or paint on 10 the -- on the duvet cover. 11 Q All right. Thank you. Now let's do 12 1838. And what does this depict? 13 A A lampshade -- or a lamp that has been 14 robbed of the shade. 15 Q Okay. Let's go to 1839. 16 What does this depict? 17 A A different bed with more blood on it. 18 Q Then let's go to 1840. And what does 19 this depict? 20 A Blood on one of the guitars that Johnny 21 was apparently trying to play. 22 Q Okay. You didn't try to play the</p>

4562	<p>1 guitar?</p> <p>2 MS. VASQUEZ: Objection, Your Honor.</p> <p>3 Calls for speculation.</p> <p>4 MS. BREDEHOFT: I didn't even get the</p> <p>5 words out.</p> <p>6 THE COURT: I'll overrule it at this</p> <p>7 point. Next question.</p> <p>8 Q What, if any, effort did you make to</p> <p>9 play a guitar?</p> <p>10 A I've never played the guitar.</p> <p>11 Q Okay. Let's go to 1841.</p> <p>12 What does this depict?</p> <p>13 A It is where Johnny slammed the end of a</p> <p>14 bottle into the wall while holding me up against</p> <p>15 it.</p> <p>16 Q Is this in the bar area?</p> <p>17 A This happened in two rooms, so it's</p> <p>18 hard to tell.</p> <p>19 Q Okay.</p> <p>20 A The bottle into the wall, the best of</p> <p>21 my recollection, happened in the kitchenette/bar</p> <p>22 area downstairs, but I can't be a hundred percent</p>	4564	<p>1 that third morning?</p> <p>2 A No.</p> <p>3 Q What else -- how were they not</p> <p>4 accurately depicting?</p> <p>5 A Well, if you can believe it, this is</p> <p>6 a -- it seems significantly cleaned up. There was</p> <p>7 much more damage, specifically broken glass. On</p> <p>8 the countertops there was a lot of broken glass.</p> <p>9 I could feel it cutting my arms when I was trying</p> <p>10 to get up, and I could feel it underneath my feet.</p> <p>11 So I don't know when these pictures were taken,</p> <p>12 but there's been some cleanup.</p> <p>13 Q Okay. Now, you indicated that the --</p> <p>14 that Johnny had turned on your iPhone and</p> <p>15 recorded; is that correct?</p> <p>16 A Yes.</p> <p>17 Q Did there come a time that you</p> <p>18 discovered a recording on your iPhone from</p> <p>19 Australia?</p> <p>20 A Yes. Much later. There was this</p> <p>21 five-hour-long recording, and naturally I didn't</p> <p>22 know what that could possibly be. Because even</p>
4563	<p>1 certain.</p> <p>2 Q Okay. And let's go to 1842. What does</p> <p>3 this depict?</p> <p>4 A Another broken lamp.</p> <p>5 Q Okay. And then I've just got a few</p> <p>6 more left.</p> <p>7 1805, and what does this depict?</p> <p>8 A Wine spill. It looks like the remnants</p> <p>9 of a wine glass being thrown, and it looks like</p> <p>10 broken glass.</p> <p>11 Q Do you recognize where this was in the</p> <p>12 house?</p> <p>13 A Well, it looks like a bedside table,</p> <p>14 but I can't be certain.</p> <p>15 Q Okay. Let's go to 1806.</p> <p>16 Let's -- let's skip that one, and let's</p> <p>17 go to 1808. Do you know what this depicts?</p> <p>18 A Wine spill.</p> <p>19 Q Okay. All right.</p> <p>20 Now, you started to testify about --</p> <p>21 before we go there, in these pictures, would you</p> <p>22 say they accurately depict the damage that you saw</p>	4565	<p>1 though Johnny and I recorded each other often as</p> <p>2 part of our, you know, struggles to figure out our</p> <p>3 relationship, this one was, you know, five hours</p> <p>4 was unusual. And that's when I discovered that</p> <p>5 there had been this recording of the end of that</p> <p>6 Australia incident, if you will.</p> <p>7 Q And did you listen to that recording?</p> <p>8 A I have heard it, yes.</p> <p>9 Q And does it accurately represent what</p> <p>10 was depicted in that recording?</p> <p>11 A Yes.</p> <p>12 MS. VASQUEZ: Objection. Form. Lack</p> <p>13 of foundation.</p> <p>14 THE COURT: All right. You want to</p> <p>15 approach? I'm not sure.</p> <p>16 (Sidebar.)</p> <p>17 THE COURT: All right.</p> <p>18 MS. VASQUEZ: The recording, Your</p> <p>19 Honor, is five hours long. She's not there for</p> <p>20 most of it. It's other people's voices.</p> <p>21 THE COURT: So I guess the question is</p> <p>22 how can she say the whole thing was accurate if</p>

4566	1 she wasn't there the whole time. 2 MS. BREDEHOFT: I'm trying to indicate 3 that she is -- 4 THE COURT: Are we going to move it in? 5 MS. BREDEHOFT: Don't we already have 6 parts of it in? 7 MS. VASQUEZ: We do not because there's 8 other voices. 9 THE COURT: Well, let's do that now. 10 Are you moving it in? 11 MS. BREDEHOFT: Yes, I'm moving in 12 parts of Defendant's 378. 13 THE COURT: What are the parts you're 14 moving in? You're not moving in all five hours to 15 this jury are you? 16 MS. BREDEHOFT: No. 17 THE COURT: But the parts you have, are 18 they just -- 19 MS. BREDEHOFT: There are other people. 20 There are absolutely other people. I don't 21 understand why that wouldn't be admissible. 22 THE COURT: Hearsay.	4568	1 THE COURT: Okay. 2 BY MS. BREDEHOFT: 3 Q Now, you testified that you made 4 arrangements to return to home. Can you 5 describe -- let's take you to the point you left 6 the Australia house to go to the airport and were 7 accompanied by Ben King. Could you tell the jury 8 what transpired during that period of time? 9 A So I left Australia shortly after that. 10 My understanding was Johnny was in the hospital 11 for his finger, and Ben King was going to 12 accompany me. And on the ride on the way to the 13 airport, Johnny called me, and we were just crying 14 on the phone. We were just crying. 15 He asked if it was -- if he had killed 16 it, meaning the relationship. It was -- I don't 17 remember the exact words that he used but he was 18 kind of asking me in that way, "Is it done? Is 19 this over? Did we kill it? Did I kill it?" that 20 sort of thing. 21 I don't remember what I was saying to 22 him, but we hung up as I went into the airport. I
4567	1 MS. BREDEHOFT: If I'm understanding, 2 it's not hearsay to see videos. 3 THE COURT: No. Videos aren't 4 statements; videos are pictures. 5 MS. BREDEHOFT: But recordings aren't 6 statements here. 7 THE COURT: If there's hearsay inside 8 recordings, it's hearsay. 9 MS. BREDEHOFT: All right. Well, then 10 I'm moving to admit them and -- 11 THE COURT: Moving to. 12 MS. BREDEHOFT: I'm moving to admit the 13 recording that I guess Your Honor's going to deny. 14 But... 15 MS. VASQUEZ: Objection. Hearsay. 16 THE COURT: The objection's hearsay. 17 I'm going to sustain the objection. 18 Ms. Bredehoft, can you tell me the number of that 19 -- the exhibit number so I can... 20 MS. BREDEHOFT: 378. 21 THE COURT: Thank you. Thank you. 22 (Open court.)	4569	1 had a mix of feelings. Nothing really was making 2 perfect sense to me, for sure. And I flew back 3 with Ben. I don't really remember speaking to Ben 4 on the flight. 5 Q When Mr. Depp was -- what you testified 6 on what Mr. Depp said to you on the phone, were 7 you on the phone with Mr. Depp? Or was there 8 anyone else you were on the phone with? 9 A I only remember speaking to Johnny. 10 And I remember sitting in the back seat of the SUV 11 that had driven me, and we were outside of the 12 entrance where you walk into the airport. And I, 13 even then, felt torn about leaving. I obviously 14 didn't want to stay, but I was in such shock. 15 MS. VASQUEZ: Objection, Your Honor. 16 Nonresponsive. 17 MS. BREDEHOFT: I don't know how that's 18 nonresponsive. 19 THE COURT: You can ask your question 20 again, Ms. Bredehoft. 21 MS. BREDEHOFT: Okay. 22 Q Please tell us how you felt at that

4570	<p>1 point and what Mr. Depp was saying to you. 2 A I remember -- 3 MS. VASQUEZ: Objection, Your Honor. 4 Asked and answered. 5 MS. BREDEHOFT: She was in the middle 6 of responding to it, Your Honor. Never said ask a 7 different question. 8 THE COURT: It's a different question. 9 But I'll sustain that objection if you want to ask 10 a different question. 11 MS. BREDEHOFT: Okay. 12 Q How did you feel at that time? 13 A I felt destroyed, like my heart was 14 broken. I didn't know what to do. I thought 15 maybe if I left him in Australia, I thought maybe 16 something would happen to him. I thought he might 17 die or kill himself. Because that certainly seems 18 like the trajectory he was on. He told me he put 19 a cigarette out on his face before, the Friday 20 before. And combined with all of the -- when I 21 was in the bedroom and he was in the hospital, I 22 found -- and I was packing my bags and stuff, I</p>	4572	<p>1 A Yes. I -- we had a short flight to get 2 to Sydney, and then in Sydney, I walked with Ben 3 through the airport to get the next plane. And we 4 passed a newsstand, and I just remember I passed 5 this newsstand and there was a book on there, you 6 know, on one of the book stands outside of the 7 store, and it had this puzzle piece on it. And 8 Johnny and I used to use that as a term of 9 endearment, puzzle piece, you know, and I saw this 10 puzzle piece on the cover of the book. It got my 11 attention, said "Four Ways to Click: A 12 Relationship Guide," so I bought it. And I -- 13 Q Who was the author? 14 A Dr. Amy Banks. 15 Q Okay. Go ahead. Please continue? 16 A So the book, at least from the 17 subtitle, said it was a book on solving 18 relationship problems. So I bought it, and I read 19 it on the way home. 20 Q And why did you buy it and read it on 21 the way home? 22 A Because I loved this man. I loved this</p>
4571	<p>1 found all these empty bags of -- coke bags, you 2 know, dime bags with white residue on them and in 3 them all over; they were in the books, in bedside 4 table. There were so many, I wondered how I 5 didn't see it before, even though I had, you know, 6 just gotten there. 7 So I was worried he would die. And I 8 was worried that we wouldn't come back from what 9 happened. I was worried that there's just no way 10 to turn this around. There was no going back. 11 But -- shock. Shock. 12 Q So you flew out of that airport. Did 13 you have to -- did you have a stop anywhere before 14 you went back to LA? 15 MS. VASQUEZ: Objection. Relevance? 16 MS. BREDEHOFT: In a minute, I'll 17 show -- 18 THE COURT: Overruled. 19 A Yes. We stopped in an airport, I think 20 it was we stopped at the Sydney airport from 21 Brisbane, I believe. 22 Q And did you have to change gates there?</p>	4573	<p>1 man so much. And it was so toxic. And for some 2 reason, I couldn't get him to -- I couldn't get 3 him to not hurt me. I couldn't -- and it seemed 4 like I was hurting him. We love each other -- 5 loved each other so much, at least I loved him so 6 much. And I didn't know what to do. I didn't 7 know what to do with this relationship. It was 8 awful and toxic, but it was so important to me and 9 I loved him so much. I -- I would have read a 10 million books. 11 Q So when you got back to LA, how long 12 before Mr. Depp came back? 13 A A few days. Johnny came back within a 14 few days. He went to his Sweetzer house, the main 15 house, which was what we did. You know, if there 16 was a problem between Johnny and I, we weren't 17 under the same roof once, you know, the fight had 18 either paused or ended, depending. But he would 19 go to Sweetzer, and I would stay at the ECB. And 20 so he went to Sweetzer upon landing, and there 21 were some conversations with the medical team, you 22 know, doctors and stuff, and I just remember</p>

4574	4576
<p>1 feeling concerned for his life because things had 2 changed. And without saying what they said to me, 3 it – 4 MS. VASQUEZ: Objection, Your Honor. 5 Hearsay. 6 MS. BREDEHOFT: She said, "without 7 saying." 8 MS. VASQUEZ: She's characterizing it. 9 THE COURT: I'll overrule for now. See 10 where we go. 11 A I was – I became really, really 12 worried that Johnny was not going to live through 13 this, that there would be infections or problems 14 and things, and he wouldn't stop using coke and he 15 couldn't get the surgery he needed because he 16 wouldn't stop using coke and they wouldn't put him 17 under because of all the coke, so – 18 MS. VASQUEZ: Objection, Your Honor. 19 Hearsay. 20 THE COURT: All right. I'll sustain as 21 to the last part. 22 MS. VASQUEZ: Thank you, Your Honor.</p>	<p>1 before you know it, we were kind of back in it 2 with the prospect, of course, of him being done 3 with all the drugs and drinking because that's 4 what necessarily had to happen for him to have 5 this surgery. So that made me feel a little, you 6 know, a little more secure in kind of coming back 7 into this relationship with him. 8 Q So I'm going to take you to March 23rd, 9 2015, just a few weeks after -- two and a half 10 weeks, roughly, after Australia. 11 Where was Johnny staying at this point? 12 A I think he was staying at the Eastern 13 Columbia – at the ECB. Yeah, he was staying at 14 the ECB at the time because we were kind of in the 15 bedroom together the night of the 22nd, which is 16 when he passed out, how I found his iPad. 17 Q I'm sorry? 18 A I found his iPad open. He was texting 19 someone with it open. He passed out, and I saw 20 what he was texting. 21 Q Please tell the jury about that. 22 A He was – he was texting this woman</p>
4575	4577
<p>1 THE COURT: All right. Next question. 2 Q So when did you next -- when did you 3 next see Mr. Depp after you got back from 4 Australia? 5 A I saw him a few days -- I don't know 6 how long it was. But it was at the doctor -- I 7 think it -- my best recollection was it was in the 8 doctor's office, or around that, he needed a 9 procedure. 10 Q Did there come a time that you 11 reconciled after Australia? 12 A Yes. Because it -- it almost felt like 13 it went away so quickly because there was this 14 surgery that he needed, and there was, maybe, a 15 few -- maybe he had more than one surgery, but it 16 was, you know, like it became, very, very about 17 getting Johnny through the next step, you know, 18 getting Johnny home, getting Johnny off the coke 19 long enough to get the procedure done. And then 20 after that procedure, getting another procedure 21 done. 22 And it was just these small steps, and</p>	<p>1 that he had had a relationship with on and off 2 kind of at the beginning of our relationship, so I 3 recognized the name. But the date was right after 4 the wedding. I saw it. He had gone to her house 5 after we got married, like, upon touching down in 6 Los Angeles I think it was the next day, he went 7 to this woman's house that he has a sexual 8 relationship with. And -- 9 Q What did you do as a result of seeing 10 that on the iPad? 11 A I freaked out. I immediately, like, 12 confronted him about it. I was, you know -- I 13 didn't care in that moment if he did kill me, 14 which was likely in confronting him at that stage 15 of our lives. I didn't even care anymore. At 16 this moment I was -- he had already ripped my 17 heart out. You know, this, like, I had just been 18 through what I -- after having been through what I 19 went through in Australia just weeks prior, I see 20 this, it was, like, believably painful -- 21 unbelievably painful. 22 Q So what did you do?</p>

<p style="text-align: right;">4578</p> <p>1 A I'm yelling at him, so just yelling. I 2 called -- I was calling him all these ugly names. 3 I was screaming at him, told him to get the fuck 4 out of the house. That's what I said. Excuse my 5 language. We were screaming at each other. 6 At some point, we were upstairs in 7 penthouse 3, and we kind of get into a -- how do 8 you describe it? Pushing each other, you know. 9 And I just remember being so mad at him for 10 cheating on me and doing so in this way, like, 11 right after the wedding, and then I, right after 12 my wedding, go to see him, and then Australia 13 happens and it just felt like everything came 14 crashing down and I was so hurt. 15 Anyway, we -- I break out of his grasp 16 at some point, and I go into my sister's room. 17 The apartments in the ECB are connecting, at least 18 three of them are, and they connect from upstairs 19 only. So you could get from Johnny and I's 20 apartment into the neighboring apartment where 21 Whitney, my sister, was staying at the time, and 22 then you can go from that apartment into</p>	<p style="text-align: right;">4580</p> <p>1 about that. And I -- I remember getting kind of 2 free from Johnny, and he left. Well, he walked 3 out of the room. 4 Q When you say "free from Johnny," what, 5 if any, connection did you have, physical 6 connection, before that? 7 A Well, I mean, I'm, you know, trying to 8 stand up for myself, and Johnny would, at that 9 stage in our relationship, he would just throw me, 10 shove me, hit me in the face, and it was just like 11 all I could do is just try to -- try to fight back 12 or try to not get more hurt than not doing 13 anything would have certainly left me. 14 I don't really recall specifics. I 15 remember at one point, he had his uncasted hand in 16 my hair and I was looking at the carpet. I don't 17 know -- I don't know what happened immediately 18 after that, but I remember he left. He was out of 19 the room for a while. I don't know how we got 20 into -- I think I heard him in P5. Again, it's 21 the neighboring apartment to that, so it's P4 in 22 between, and P5 is the corner and that apartment</p>
<p style="text-align: right;">4579</p> <p>1 penthouse 5, again, still on -- on the top floor. 2 So I went through Johnny's office, 3 which is how you access the door that gets you 4 into Whitney -- the neighboring apartment where 5 Whitney was, my sister. And I went in there and 6 woke her up, crying, screaming, saying, "What am I 7 going to do?" 8 MS. VASQUEZ: Objection, Your Honor. 9 Hearsay. 10 A Sorry. 11 THE COURT: I'll sustain. 12 MS. BREDEHOFT: That was not offered 13 for the truth of the matter. 14 THE COURT: I'll sustain the objection. 15 Q Okay. You entered Whitney's -- don't 16 tell the jury what you said to her, but what 17 happened next? 18 A Johnny comes into penthouse 4 and grabs 19 me. I don't know what -- why -- I don't know what 20 he was doing. But at one moment I kind of am 21 aware that my sister's somewhere nearby, and I 22 thought about that. I just remember thinking</p>	<p style="text-align: right;">4581</p> <p>1 was empty basically and so I used it, the top 2 bedrooms, the bedrooms on the top floor, as my 3 closet. And I had all these clothing racks and 4 shoe racks and stuff like that in there. And then 5 it had another level, the mezzanine, which is an 6 over -- you know, it hung over the rest of the 7 bottom floor, and I used that as my office. And 8 the bottom floor is, of course, the living room, 9 with just some couch -- sparsely decorated with 10 some couches and a low table. 11 And I go on to -- I hear him in 12 penthouse 5, and -- oh, and the lower level also, 13 there's another painting studio, painting area of 14 mine. So I go in there because I hear him, and 15 he's in there and he's screaming, but I don't know 16 who he -- my understanding was he was screaming at 17 me, but I wasn't in that apartment. I could hear 18 him. And when I heard him, I came into the -- 19 into penthouse 5, and I have to go down the 20 stairs, and I went down the stairs to the 21 mezzanine level where my office was. 22 And I could see him and a security</p>

<p style="text-align: right;">4582</p> <p>1 guard and Debbie, the nurse, and he was sitting on 2 the sofa when I first walked into the room. And 3 he kind of stood up, was drinking a Red Bull and 4 screaming at me, and Debbie came up the stairs 5 because I'm screaming back at him. She came up 6 the stairs, I think, and while we were -- she came 7 up, I suppose, to kind of comfort me. 8 And while I was up on the mezzanine 9 floor, Whitney came down, and he threw the Red 10 Bull can up at me, certainly, but it kind of 11 either hit or narrowly missed Debbie. And I said 12 he -- I called him a pussy and said something 13 about, you know, I'm screaming at him angrily. I 14 at least called him a fucking pussy. I don't know 15 what else I said, but I was screaming at him 16 because he threw this can at me and everything 17 else that had happened. 18 And when I did that, he bolted up the 19 stairs, and, you know, there's only -- I mean, 20 he -- he was up the first flight of stairs. 21 Again, I'm on the mezzanine which is in between 22 two flights of stairs. Bolted up the steps, and</p>	<p style="text-align: right;">4584</p> <p>1 face. He didn't push my sister down the stairs. 2 In all of my time, all my time of being in that 3 relationship to that point, hadn't even landed one 4 on Johnny. Sure, I had tried to fight back; threw 5 my arms, flailed my arms, hit, whenever I could, 6 to try to block blows myself, but never landed 7 anything. 8 And Johnny kind of looked stunned and 9 then laughed at me and then lunged at me again. 10 And before I know it, security stepped in between 11 us and pulled Johnny away. And I went upstairs 12 with my sister, and we locked the door and I could 13 just hear all this commotion happening in 14 penthouse 5. I could hear him raging, destroying 15 my things. I could hear it. And then some point, 16 I saw it the next day. 17 Q Tell the jury what you saw the next 18 day. 19 A All these clothing racks -- all my 20 clothing racks were toppled over, shoe racks 21 toppled over, thrown down the stairs, desk -- my 22 desk wiped off, just looked like everything that</p>
<p style="text-align: right;">4583</p> <p>1 I -- I don't know -- I don't know how he managed 2 to get his hands in my hair so fast, but he had 3 his hand on the back of my head, my hair, and kind 4 of was yanking me down and hit me in the face with 5 this cast he had. 6 I just remember this brief struggle we 7 had before kind of breakaway Whitney, my sister, 8 all of a sudden put herself in between Johnny and 9 I. She just threw herself, like, in the line of 10 fire, whatever. She just all of a sudden was 11 there and was trying to get Johnny to stop. Her 12 back was to the staircase, and Johnny swings at 13 her. And I just see my little sister with her 14 back -- face -- her back to the staircase, and I 15 know Johnny swings at her and I don't even wait, 16 don't even wait for any other -- I don't hesitate. 17 I don't wait. 18 I just, in my head, instantly think of 19 Kate Moss and the stairs, and I swung at him. In 20 all of my relationship to date with Johnny, I 21 hadn't landed a blow, and I, for the first time, 22 hit him, like, actually hit him, square in the</p>	<p style="text-align: right;">4585</p> <p>1 he could touch, he tried to turn over, destroy, 2 smash, you know. But my clothing racks, these 3 huge, heavy clothing racks full of clothes, 4 there's at least one of them he threw down the 5 stairs. The rest were toppled over. 6 Q Amber, I'm going to fast-forward to 7 December 15, 2015. Were you and Mr. Depp together 8 at that time? 9 A Yes, we were. 10 Q Did you have a fight that night? 11 A December 15th? Yes, we did, but I -- I 12 don't recall -- I don't recall what started the 13 argument. We had had periods leading up to that 14 that were really beautiful and really good and 15 then periods that weren't. 16 Q Well, let's talk about the December 15, 17 2015. 18 What do you recall of your fight that 19 night with Mr. Depp? 20 A I remember him chasing me in the 21 kitchen. I remember throwing something in his 22 direction to slow down his momentum. I remember</p>

4586
1 him screaming. I remember him getting on top of
2 me at some point, toppling me. Mostly at that
3 moment downstairs, he was hitting me in my face.
4 This is another example of when I wish so much I
5 could tell you in exact sequence, but I can't.
6 It's flashes. So I'll tell you what I do
7 remember.
8 I remember at some point trying to
9 go -- flee upstairs. And we had -- he got ahold
10 of me, and I got free and I managed to get all the
11 way up the stairs almost. I was on the last
12 flight, and we had had some interaction where I
13 said -- I think I said something to him on the
14 stairs. It might have been broken up, and I think
15 I said something on the stairs. And I just
16 remember how quickly he shot back up those stairs
17 and grabbed me by the back of my hair, my head,
18 and slammed his hand on my head. And I went down
19 on the stairs, and he overtook me.
20 I remember him -- so well, I remember
21 his boots and the sound I made. I remember him
22 grabbing my, my hair, my head and kind of dragging

4587
1 me up the stairs the rest of the way. He dragged
2 me into the room where that opens into, like a
3 salon/foyer area. And we had this argument that
4 kind of, you know, was a shoving match that I was
5 losing. By the second or third shove, he sent me
6 toppling over this chaise lounge [sic], like a
7 little low-line sofa seat, and I hit my head on
8 the -- on the brick wall. There was an exposed
9 brick wall.
10 I remember I stood up, and I remember
11 Johnny asking me if I wanted to go. And he did
12 that thing where he's, like, challenging me, said
13 it in that way, challenging me to stand up and get
14 back up. And when I did, he said, "Oh, you really
15 want to go now, tough guy." Shoved me back down,
16 "Oh, you really want to go, huh? Oh, you're so
17 tough."
18 I stood back up again. This time he
19 hits me in the face. I stand back up and look him
20 right in the eye. It was just a really still
21 moment, I'll never forget it, really still. I
22 stood up and he said, "You really want to go

4588
1 again, tough guy?" And I just looked right at,
2 him. Just liked right at his face. And he balled
3 up his fist, leaned back, and headbutted me square
4 in the nose, just right as I stood in front of
5 him. I was a foot from him, slammed me right in
6 the nose.
7 Instantly, searing pain. It's one of
8 the few memories I have in this long relationship
9 that I actually remember the, like, the physical
10 pain in that moment, you know, it's just searing,
11 and I remember thinking, "You have your hand
12 free." You know, like I had time to think, "You
13 have your hands free. You could have hit me with
14 your hands. Why did you headbutt me?"
15 I told him that night I was going to
16 leave him. I went through his office to go into
17 the other room where I kept all my stuff. We had
18 another struggle. He overtook me. I was trying
19 to hit him off me. I was trying to get him to --
20 I was trying to get his body off of me. I think
21 he was just pummeling me. I don't know how to
22 describe what -- I went down to the floor. I

4589
1 remember him being on top of me, and he's
2 screaming and swinging at me while I was on the
3 floor. He had me by the hair and dragged me the
4 rest of the way from the office into the
5 neighboring room -- the neighboring apartment.
6 I remember the door that connected
7 these two buildings -- these two rooms had a metal
8 grate -- not grate, but a metal bottom, metal
9 floor that separated it, a big heavy, bank door.
10 And I remember he was dragging me, and I removed
11 my hands from my head and kind of tried to grab
12 onto the metal door to prevent him from dragging
13 me into the room. But he -- I couldn't stop him.
14 He dragged me all the way from that carpet, I was
15 trying to ex- -- I was trying to get free of his
16 grasp. I was trying to stop him from pulling me.
17 I remember feeling the carpet and the
18 metal, and he wrestles me -- drags me up to the
19 bed, throws me down onto the bed, and kind of
20 wrestles me down onto the bed. And he kneels on
21 my back with one -- one leg. And I was trying to
22 fight him off me because I was face down on the

4590	<p>1 bed top, and he wrestled me down, kind of trying 2 to hold me down with his knee on my back. And 3 he's punching me, punching me with a closed fist, 4 punching me repeatedly. And I don't remember even 5 feeling the pain. I just remember the sound of 6 Johnny's voice. He got next to my ear, and he was 7 screaming over and over and over again. Each time 8 it sounded louder and more desecrate: "I fucking 9 hate you. I fucking hate you. I fucking hate 10 you," over and over. "Fucking hate you." 11 And then pounding the back of my head, 12 pounding it with his fist. And I don't even 13 remember feeling pain. I just could hear myself 14 scream until I couldn't hear myself anymore. I 15 could just hear him say that he was going to kill 16 me. And that he sounded like an animal in pain 17 when he was saying he was -- that he fucking hated 18 me. He sounded like he was almost crying, or 19 something in his voice was different. He sounded 20 different, like, he sounded like he was in agony. 21 It was high pitched and loud. 22 And I don't know how many times he just</p>	4592	<p>1 And it was broken from his boot trying to get a 2 purchase on it while he was -- 3 MS. VASQUEZ: Objection, Your Honor. 4 Calls for speculation. 5 A I could feel it. 6 THE COURT: Overruled. 7 MS. BREDEHOFT: Thank you. 8 Q Please continue. 9 A I was there for it. 10 And while he was on top of me, I could 11 feel that. I could feel him trying to get 12 balance. I could feel him slipping. I could hear 13 it. I don't know how I got off the bed. I don't 14 know what happened to me from the time I was -- I 15 stopped hearing myself scream, I don't know what 16 happened to me. It's a really weird feeling 17 because I -- next thing I remember is laying -- 18 leaning against the broken part of the bed and on 19 the carpet and my friend saying "Oh, my God, oh, 20 my God." 21 MS. VASQUEZ: Objection, Your Honor. 22 Hearsay.</p>
4591	<p>1 hit me over and over and over again, and I got 2 really still and it felt in my body, like, got 3 quiet. And I thought, "This is how I die. He's 4 going to kill me now, and I'm not -- he's going to 5 kill me and he -- he wouldn't even have realized 6 it." 7 I couldn't breathe. I remember trying 8 to scream, and I couldn't scream. I was 9 suffocating in this pillow top with him holding me 10 down, punching me over and over. And I don't have 11 any memory after that until I woke up. 12 Q When you woke up, was there anyone 13 there? 14 A I remember hearing my best friend's 15 voice. I felt like it came -- I felt like it was, 16 like, on a speakerphone, like it came from 17 everywhere. I just heard her voice in a weird 18 way. It felt like it was coming from two 19 directions. I realized that I was sitting on the 20 edge of the bed on the carpet of the floor against 21 the broken frame of the bed, and it was a 22 low-lying bed with a really thick, wooden frame.</p>	4593	<p>1 THE COURT: Sustained. 2 MS. BREDEHOFT: Okay. 3 Q Go ahead. Without saying what Rocky 4 said. 5 A And I -- eventually she called the 6 nurse, Nurse Erin. She got something out of the 7 freezer for my face. She did a concussion check 8 with Erin on the phone. I thought I probably had 9 a concussion and certainly that I had a broken 10 nose. There was blood everywhere, blood all over 11 those pillows. My head was bleeding from the 12 ripped-out hair, chunks of hair on the floor, all 13 over the place, actually. It was just all over 14 the apartment. He, after leaving me, had written 15 on the countertops in Sharpies. 16 MS. BREDEHOFT: Michelle, I'm going to 17 ask you to bring up Defendant's Exhibit 510. 18 Q Do you recognize this photograph? 19 A Yes, I do. 20 Q And does it accurately depict the scene 21 portrayed? 22 A Yes. That's the next day, I think.</p>

4594	1 MS. BREDEHOFT: Your Honor, I'm going 2 to move the admission of Defendant's Exhibit 510. 3 MS. VASQUEZ: No objection, Your Honor. 4 THE COURT: All right. 510 into 5 evidence. You can publish it, please. 6 MS. BREDEHOFT: Thank you. 7 Q Could you describe to the jury what 8 that is? 9 A Those are chunks of my hair that Johnny 10 ripped out while dragging me and punching me. 11 Q Thank you. 12 MS. BREDEHOFT: Michelle, could you 13 bring up 513, please, Defendant's 513. 14 Q Does this picture accurately depict you 15 and the scene portrayed? 16 A I think this is a couple days later, 17 but, yeah. 18 Q Okay. 19 MS. BREDEHOFT: I'm going to move to 20 admission of Defendant's 513. 21 MS. VASQUEZ: No objection. 22 THE COURT: All right. 513 in	4596	1 beat me up. 2 Q Thank you. 3 MS. BREDEHOFT: Michelle, if you can, 4 bring up Defendant's 515. 5 Q Does this accurately portray the scene 6 depicted? 7 A Yes. 8 MS. BREDEHOFT: I'm going to move the 9 admission of Exhibit 516. 10 MS. VASQUEZ: No objection. 11 THE COURT: 515 or 516? 12 MS. BREDEHOFT: 516. I misspoke. 13 THE COURT: You said 515 before. 14 MS. BREDEHOFT: 515. 15 THE COURT: No objection to 515? 16 MS. VASQUEZ: No, Your Honor. 17 THE COURT: 515 in evidence. You can 18 publish it. 19 Q And what does that depict, Amber? 20 A This is my face sometime after. 21 Q All right. Let's look at 22 Defendant's 516, please.
4595	1 evidence. 2 Q And could you tell the jury what this 3 is and what it depicts? 4 A This is my face with a busted lip, 5 which is difficult to see in this picture, but my 6 two black eyes; one is worse than the other, it 7 was, like I said, maybe a day or two later, and my 8 broken nose. 9 Q All right. Thank you. 10 MS. BREDEHOFT: Michelle, can you bring 11 up Defendant's Exhibit 514. 12 Q Does this accurately portray the scene 13 depicted? 14 A Yes. That's my face sometime after. 15 MS. BREDEHOFT: Your Honor, I'm going 16 to move the admission of Defendant's 514. 17 MS. VASQUEZ: No objection. 18 THE COURT: 514 in evidence. You may 19 publish. 20 Q All right. If you could, just briefly 21 describe for the jury what this one is. 22 A That's my face sometime after Johnny	4597	1 Does this accurately portray the scene 2 depicted, Amber? 3 A Yes, it does, maybe -- 4 Q Let me move it first. 5 MS. BREDEHOFT: Move the admission of 6 Defendant's Exhibit 516. 7 MS. VASQUEZ: No objection. 8 THE COURT: 516 in evidence. 9 MS. BREDEHOFT: May we go ahead and 10 publish it to the jury? 11 Q Okay. Amber, go ahead and explain what 12 it is. 13 A I think that's maybe that night or the 14 next night after Johnny left me on the bed. 15 Q Let's go to 517. 16 Does this accurately portray the scene 17 depicted? 18 A Yes, it does. 19 MS. BREDEHOFT: Move to admit 20 Defendant's 517, Your Honor. 21 MS. VASQUEZ: No objection. 22 THE COURT: 517 in evidence.

<p style="text-align: right;">4598</p> <p>1 Q Amber, please describe for the jury 2 what this portrays. 3 A That's my face after this incident. 4 Q And what is -- what's portrayed on your 5 lip? 6 A Well, he busted my lip when he punched 7 me. It's bleeding in this picture. It kept 8 reopening. You know, it's a mouth. Your lips 9 move. 10 MS. BREDEHOFT: Let's go to 519. 11 Q Does this accurately portray the scene 12 depicted? 13 A Yes. 14 MS. BREDEHOFT: Move the admission of 15 519. 16 MS. VASQUEZ: No objection, Your Honor. 17 THE COURT: 519 in evidence. 18 Q Can you tell the jury what this shows? 19 A This is my lip a few days later. 20 Q Okay. Let's go to Defendant's 520, 21 please. 22 Does this accurately depict the scene</p>	<p style="text-align: right;">4600</p> <p>1 THE COURT: 522 in evidence. 2 Q And what shows there? 3 A My face is healing. 4 Q Okay. 5 MS. BREDEHOFT: Let's go to 523. 6 Q Does this accurately portray the scene 7 depicted? 8 A Yes. I think this is day or so after, 9 maybe longer. I can't tell. But, yes, it does. 10 MS. BREDEHOFT: Move the admission of 11 523. 12 MS. VASQUEZ: No objection. 13 THE COURT: 523 in evidence. 14 Q I'm just going to draw your attention, 15 Amber, to an area up here. What, if any, bruising 16 did you sustain in that area? 17 MS. VASQUEZ: Objection. 18 MS. BREDEHOFT: What, if any. 19 THE COURT: I'll sustain the objection. 20 Q What, if any, bruising did you sustain? 21 MS. VASQUEZ: Same objection. 22 THE COURT: I'll sustain the objection.</p>
<p style="text-align: right;">4599</p> <p>1 portrayed? 2 A Yes. 3 MS. BREDEHOFT: Move the admission of 4 Defendant's 520 -- is it 521? 520. 5 MS. VASQUEZ: No objection. 6 THE COURT: 520 in evidence and 7 published. 8 Q Can you please tell the jury what's 9 depicted here? 10 A That's my scalp with a chunk of it 11 missing from when Johnny was dragging me by my 12 hair. 13 MS. BREDEHOFT: Let's go to 14 Defendant's 521, please. I don't think that's the 15 same. Let's take that one down. Let's go to 522. 16 Q Does this accurately portray the scene 17 depicted? 18 A Well, it's a few days later. 19 Q Okay. 20 MS. BREDEHOFT: Move the admission of 21 522, please. 22 MS. VASQUEZ: No objection.</p>	<p style="text-align: right;">4601</p> <p>1 Q What injuries did you have? 2 A I had bruising on my temple, my chin, 3 the -- my neck, the back of my head. I had 4 swelling and pieces of, you know, my scalp kind of 5 ripped, torn. They were gross, pussy, but this 6 from the bruising around my temple from one of the 7 blows. One of several blows, I don't know. 8 MS. BREDEHOFT: Let's go to 524. 9 Q Does this accurately portray the scene 10 shown? 11 A Yes. 12 Q Okay. 13 MS. BREDEHOFT: Move the admission of 14 524. 15 MS. VASQUEZ: No objection. 16 THE COURT: 524 in evidence. 17 Q And what does this show? 18 A It's a -- I had a pretty -- can I touch 19 the screen? 20 THE COURT: Yes, ma'am, you can. 21 Q Yes. 22 A I had a pretty gross bruise right there</p>

<p style="text-align: right;">4602</p> <p>1 in my head, my temple. Difficult to see it in 2 this light, but I remember it was pretty ugly. 3 MS. BREDEHOFT: Now, let's go to 4 Defendant's 509. 5 Q Does this accurately portray the scene 6 depicted? 7 A Yes, it does. 8 MS. BREDEHOFT: Your Honor, I move the 9 admission of Defendant's 509. 10 MS. VASQUEZ: No objection. 11 THE COURT: All right. 509. 12 Q Will you please tell the jury what this 13 is? 14 A That's the bed Johnny broke while on 15 top of me. 16 MS. BREDEHOFT: All right. Let's go to 17 Defendant's 511, please. 18 Q Does this accurately portray the scene 19 depicted? 20 A Yes. 21 Q Okay. 22 MS. BREDEHOFT: Move the admission of</p>	<p style="text-align: right;">4604</p> <p>1 it. 2 A That's downstairs in the main 3 apartment. 4 Q Okay. 5 MS. BREDEHOFT: Let's go to 6 Defendant's 525. 7 Q And does this accurately depict the 8 scene portrayed? 9 A Yes. 10 MS. BREDEHOFT: Move the admission of 11 525, please. 12 MS. VASQUEZ: No objection. 13 THE COURT: All right. 525 in 14 evidence. 15 Q And please tell the jury what that is. 16 A This is Johnny's graffiti on our 17 kitchen counter that he left on his way out, I 18 suppose. 19 MS. BREDEHOFT: And I think 20 Defendant's 526 is already into evidence. Can you 21 just bring that up. 22 THE COURT: Yes, 526 is in evidence.</p>
<p style="text-align: right;">4603</p> <p>1 Defendant's 511. 2 MS. VASQUEZ: No objection. 3 THE COURT: All right. 511 in 4 evidence. 5 Q What do you see in this picture, Amber? 6 A Just more destruction from a part of 7 the fight that happened in the bedroom, not the 8 bedroom that I was just talking about. It was the 9 main bedroom. There had been a part of the fight 10 that happened in there too. 11 Q Okay. 12 MS. BREDEHOFT: Let's go to 13 Defendant's 512, please. 14 Q Does this accurately portray the scene 15 depicted? 16 A Yes. That's downstairs in the main -- 17 Q Wait. Let me move the admission of it. 18 MS. BREDEHOFT: Move the admission of 19 Defendant's 512, please. 20 MS. VASQUEZ: No objection. 21 THE COURT: 512 in evidence. 22 Q Okay. Now please tell the jury about</p>	<p style="text-align: right;">4605</p> <p>1 Q Now, Amber, after -- as of December 15, 2 2015, what were your plans for Christmas that 3 year? 4 A Well, up to this point, the plan was to 5 have our families join us. We would go with the 6 kids and celebrate Christmas together, you know, 7 as a married couple, and we would all go to 8 Johnny's island. And he'd invited my best friend 9 at the time, Rocky, and her family, meaning her 10 mom and her fiancé and my parents and my sister. 11 We were all going to go to this island I've told 12 you about that Johnny has in the Bahamas and spend 13 it together. And that was the plan leading up to 14 this. 15 Q All right. And what, if anything, 16 changed as a result of this night of December 15, 17 2015? 18 A After they saw my face, no one wanted 19 to go to the island anymore with Johnny. They 20 wanted me to leave him. 21 Q Did you have to appear -- were you 22 scheduled to appear on the James Corden show on</p>

4606	<p>1 December 16th?</p> <p>2 A That's right. I was promoting the</p> <p>3 Danish Girl, the film I had done earlier in the</p> <p>4 year in London before going to see Johnny in</p> <p>5 Australia. So I was promoting that film that had</p> <p>6 been completed, and they asked me to make an</p> <p>7 appearance on the night show called the James</p> <p>8 Corden show.</p> <p>9 After this appeared and I did the first</p> <p>10 concussion check with Erin on the phone, I got</p> <p>11 worried that I wouldn't be able to hide the</p> <p>12 bruising and swelling. But I -- I stayed up all</p> <p>13 night and the next day checked in the mirror to</p> <p>14 see if I could get away with it, meaning hiding it</p> <p>15 so I could make an appearance. And I gambled and</p> <p>16 thought maybe I could pull it off.</p> <p>17 I had my hair and makeup team come, and</p> <p>18 they worked around it, meaning worked around the</p> <p>19 lesions on my head with the hair spray, because</p> <p>20 that stings, and worked around the bruising by</p> <p>21 covering it with heavy makeup, heavier makeup than</p> <p>22 normal, bruise-covering makeup. And I remember my</p>	4608	<p>1 changed your mind and went to the Bahamas with</p> <p>2 Mr. Depp for Christmas?</p> <p>3 A Eventually.</p> <p>4 Q In 2015?</p> <p>5 A Eventually, I did.</p> <p>6 Q And you went there with whom?</p> <p>7 A I went with Johnny's kids -- I was --</p> <p>8 you know, obviously I didn't see Johnny after this</p> <p>9 because he doesn't -- he didn't face the damage he</p> <p>10 caused, in my experience. He was never around for</p> <p>11 the cleanups. And so he wasn't around for a few</p> <p>12 days, and I eventually heard from him, and he said</p> <p>13 he wanted to talk and that he understood that it</p> <p>14 couldn't go back, you know, like almost as if he</p> <p>15 understood that I wouldn't forgive him, made it</p> <p>16 easier somehow to talk to him. You know, I didn't</p> <p>17 feel so bad about myself in that case because, you</p> <p>18 know, how could I put up with this, right?</p> <p>19 But with the understanding that we were</p> <p>20 done, I could have, you know, allowed for us to</p> <p>21 have one last conversation, I suppose. But I</p> <p>22 just -- you know, it's like -- I was heartbroken</p>
4607	<p>1 lip was still bleeding and swollen, so we did</p> <p>2 this, like, really thick, super-heavy, matte red</p> <p>3 lipstick. I remember very well at the time that</p> <p>4 we had no choice in coloring. That was a -- one</p> <p>5 of my favorite colors to wear, and this occasion</p> <p>6 we had no choice because nothing else would hide</p> <p>7 my busted lip. And I went on the show, did what I</p> <p>8 always do. I told people I had an accident.</p> <p>9 MS. VASQUEZ: Objection, Your Honor.</p> <p>10 Hearsay.</p> <p>11 THE COURT: All right. Sustain the</p> <p>12 objection.</p> <p>13 MS. BREDEHOFT: Not offered to prove</p> <p>14 the truth of the matter because she didn't have an</p> <p>15 accident, but...</p> <p>16 MS. VASQUEZ: Your Honor.</p> <p>17 THE COURT: I'll sustain the objection.</p> <p>18 MS. BREDEHOFT: Okay.</p> <p>19 Q Please continue. Did you appear on the</p> <p>20 show?</p> <p>21 A I appeared on the show.</p> <p>22 Q And did there come a time that you</p>	4609	<p>1 by the idea that I would spend this -- my first</p> <p>2 Christmas as a married couple with his kids and</p> <p>3 everything on the island, I was heartbroken at the</p> <p>4 idea of missing that. And, you know, it's -- the</p> <p>5 best I can describe is it for every, every hit,</p> <p>6 every incidence of violence, every time I was</p> <p>7 choked, every single one of these incidences was</p> <p>8 like a heavy coin put into a piggy bank. And, you</p> <p>9 know, you think, "Okay. Each single one of these</p> <p>10 is like" --</p> <p>11 MS. VASQUEZ: Objection, Your Honor.</p> <p>12 Nonresponsive.</p> <p>13 MS. BREDEHOFT: I think it's</p> <p>14 responsive, Your Honor.</p> <p>15 MS. VASQUEZ: The question was "With</p> <p>16 whom did you go?"</p> <p>17 THE COURT: If we could ask the</p> <p>18 question.</p> <p>19 Q Tell us how you felt and what you were</p> <p>20 thinking in this process of whether to go to have</p> <p>21 Christmas with Mr. Depp and his children?</p> <p>22 A I guess I was trying to explain.</p>

<p style="text-align: right;">4610</p> <p>1 Q Go ahead. Go ahead. 2 A That, you know, just you think each one 3 of these is – it's almost like you – for each 4 one of these things that happens, you lose the 5 will or resolve to leave. You know, it's like 6 every single heavy coin you put in this piggy bank 7 is like an investment into the future you're going 8 to get to, you know, and then before you know it, 9 you're just carrying around this weighted ball, 10 this piggy bank's too heavy. You can't leave. 11 You know, for every single time I went 12 back or allowed him back after this sort of thing 13 would happen, I lost a piece of myself, a piece of 14 my self-confidence, my trust in myself to believe 15 and move on. You know, I lost fortifications. I 16 lost myself, and it was somehow easier to stay. 17 I didn't want to stay in the violence 18 or this, I wanted to stay with Johnny, the good 19 Johnny that I loved. So I, like, put another one 20 of those coins in the piggy bank for investment 21 and hope and future, and I forgive him. It wasn't 22 even that simple. I just decided to believe him</p>	<p style="text-align: right;">4612</p> <p>1 Q So let's go to the island for the 2 Christmas holidays. And what, if any, arguments 3 did you have with Mr. Depp at the island over the 4 Christmas holiday? 5 A Towards the end of the trip, it was – 6 I mean, the trip itself was pretty nice. But 7 towards the end, he started drinking again and 8 started with wine. And we were on the couch in 9 the main house, the cabin, it's like a one-room 10 kind of cabin. And we're sitting on the couch and 11 Johnny – what I perceived as nodding off, I don't 12 still know what it was, but he was kind of passing 13 out or nodding off or something like that. And 14 I'm sensitive at this point to the clues that I 15 can pick up on to know what pattern of behavior 16 I'm dealing with because they made a huge 17 difference in my life, so if I knew what he was on 18 and what he was doing, I could react accordingly. 19 So I'm picking up clues. I'm sitting 20 next to him, and he's nodding off. And every 21 single time he kind of, like, nods off he dumps 22 his glass of wine on my lap. And I say every</p>
<p style="text-align: right;">4611</p> <p>1 that it would never happen again, clean and sober 2 once again. This time was the last time because 3 it couldn't be worse than this, right? It 4 couldn't be worse. And part of me thought maybe 5 it just needed to get this bad to get, you know, 6 like now we can't go back. There's no way this 7 could happen again. 8 So I went to the island. After a few 9 days of talking with Johnny, arguing with Johnny, 10 talking with Johnny, negotiating that he's going 11 to be clean and sober, he wasn't going to drink 12 anymore, he wasn't going to use anymore, he would 13 never lay a hand on me again, he would rather die 14 than do that, that's what he was saying, I was 15 scared. My friends were scared. But I decided to 16 go. 17 After a few days of having the plane 18 and the kids waiting, not knowing what was going 19 on, they were at Sweetzer, at the main house, kind 20 of just waiting to go on this Christmas vacation. 21 And eventually I got in the car with Johnny, and 22 we picked his kids up and left for the island.</p>	<p style="text-align: right;">4613</p> <p>1 single time because it happened three times. 2 First time, whatever. Second time, I'm like, 3 "Johnny are you all right?" and I probably say it 4 like a little weighted. And in my head, I'm just 5 wondering what he's on. Does this mean he's on 6 the roxies again? Is it nodding off? What's 7 going on? What am I going to deal with? 8 He'd just made a promise that he was 9 clean and sober. We had the horrible thing happen 10 in December. I thought we were moving forward. 11 And the third time this happens, I jump up. I 12 already changed my pants twice, and I jumped up 13 and I shouted at Johnny, like, "What are you 14 doing?" Or "Johnny, you spilled it on me again," 15 something to that effect. And I get up, like a – 16 get up off the couch, and Johnny's son says – 17 MS. VASQUEZ: Objection, Your Honor 18 hearsay. 19 MS. BREDEHOFT: Your Honor, not offered 20 for truth of the matter. It tells, it explains -- 21 THE COURT: If you could approach, I 22 just don't know.</p>

4614	1 (Sidebar.) 2 THE COURT: I just don't know what the 3 statement is, so I can't say if it's for the truth 4 or not of what did his son say. 5 MS. BREDEHOFT: His son's going to say 6 is "Do you need any help?" And she's going to say 7 she looked pointedly at Johnny and said, "No. 8 Thank you, Jack." And then she went in to change, 9 and that's when he came after her. So it fits 10 that she said "No. Thank you." 11 THE COURT: So you're saying hearsay? 12 MS. VASQUEZ: Hearsay. 13 THE COURT: Why are you saying it's 14 not? 15 MS. BREDEHOFT: It's not offered to 16 prove the truth of the matter. What he said, the 17 fact that he said, "Do you need some help?" it's 18 not offered to prove the truth that he wanted to 19 help her. 20 THE COURT: What's it offered for? 21 MS. BREDEHOFT: It's to show the chain 22 that she says, "No, thank you," and she looks at	4616	1 So I kind of say this in a pointed way 2 at Jack, thanking him for offering. And I get up, 3 go to the closet, take off the pants that have 4 just been ruined, and Johnny comes into the closet 5 right after me and slams me up against the side of 6 the closet, and I mean, just with clarity, while 7 holding my neck, said he'll fucking kill me if I 8 ever spoke to him like that in front of his kids 9 again, if I ever embarrassed him, and he shoved me 10 at embarrassed. If I ever embarrass you -- "If 11 you ever embarrass me again in front of my kids, 12 I'll fucking kill you." 13 And I don't know -- I don't recall who 14 told Jack to leave or -- I don't really recall 15 having an awareness of where he was at this point. 16 But I leave the closet, go into the bathroom which 17 is right next to it, and he comes barreling into 18 the bathroom behind me. Before he does that, I 19 said something snarky to him, "Don't fucking ever 20 talk to me like that again," or "I hate you," or 21 something in response, you know, just something so 22 that I felt like I wasn't just being a punching
4615	1 Johnny. And that's what sets him off, and he 2 beats her up. 3 THE COURT: Well, then it's for the 4 truth of the matter. 5 MS. BREDEHOFT: Well, but it's not. 6 Because Jack is just saying, "Do you need some 7 help?" 8 THE COURT: All right. I'll overrule 9 the objection. 10 MS. VASQUEZ: Okay. Thank you. 11 (Open court.) 12 BY MS. BREDEHOFT: 13 Q Amber, please continue. Jack said... 14 A Says, "Are you okay?" Or "Can I help?" 15 something to that effect. And I pointedly say to 16 Jack, but really to Johnny, like, "Thank you, 17 Jack," to make a point of the fact that he hadn't 18 offered to help me or even acknowledge that he had 19 been spilling wine. First, he's drinking wine. 20 Second, he's spilling it all over me, and third 21 he's spilling it because he's nodding off is what 22 I assume.	4617	1 bag. 2 And I kind of, like, get over to the 3 bathroom, but I didn't even have the door shut 4 before he was in the bathroom with me. And I 5 don't know if he used my body to shut the door or 6 if he just shut it. But, again, bangs me up 7 against the wall. But this time he just -- just 8 grabbed my vagina, like, I was wearing this peach 9 kind of, like, netted kind of styled swimming suit 10 underneath. 11 That's what I had on from the waist 12 down, and he just grabbed me, best I can explain 13 it, with his -- shoved his fingers inside me, but 14 through my bathing suit, like, moved my bathing 15 suit out of the way and just kind of held me there 16 and asked me if I was so fucking tough, if I 17 thought I was so fucking tough. "Oh, you're tough 18 like a man now? You're a man now?" Kind of 19 taunting me while jerking me around. And he kind 20 of seemed to do this thing where he was smiling, 21 not just like teasing me, you know? "Oh, yeah. 22 You think you're so fucking tough? Now what? Now

<p>4618</p> <p>1 what?"</p> <p>2 I don't know what happened after that.</p> <p>3 I went back into the room, or he went into the</p> <p>4 room. I don't know who went into the main room</p> <p>5 first.</p> <p>6 I just remember his hand landing on the</p> <p>7 back of my shoulder/neck area. I remember trying</p> <p>8 to get him off of me. I don't know. I don't know</p> <p>9 what the next thing that happened was, but I do</p> <p>10 remember I knew I needed to get away from him. At</p> <p>11 some point, I ran. I ran out of the back door,</p> <p>12 ran out onto the patio. At some point before I</p> <p>13 ran, he swung at me, but I don't even remember how</p> <p>14 much of an impact it meant -- met -- made. But I</p> <p>15 remember running. I threw something in his</p> <p>16 direction when I was getting away from him.</p> <p>17 I ran down the deck, ran out into the</p> <p>18 kind of like parking lot area, gravel parking lot</p> <p>19 area, of the house, and that's my estimation of</p> <p>20 when Johnny reached me, grabbed me by the hair,</p> <p>21 swung me around. I remember he hit my face at</p> <p>22 least once, but I'm not quite sure in what</p>	<p>4620</p> <p>1 the case to you by Memorial Day. So in order to</p> <p>2 keep that promise, there's going to be a few</p> <p>3 things I need from you, okay?</p> <p>4 One thing, starting on May 16th, we're</p> <p>5 going to start having court at 9 a.m., so we'll be</p> <p>6 going 9 a.m. to 5 p.m. Some days we might have to</p> <p>7 go to 5:30, so I want to let you know ahead of</p> <p>8 time so you can plan accordingly, okay?</p> <p>9 The other thing I need from you is</p> <p>10 Friday, May 27th, which is the Friday before</p> <p>11 Memorial Day, is going to be a court day. On that</p> <p>12 day, we're going to have closing arguments, and</p> <p>13 the case is going to be turned over to you for</p> <p>14 deliberations on that day, okay? So again, I</p> <p>15 wanted to let you know ahead of time, so you can</p> <p>16 plan accordingly so we get this taken care of for</p> <p>17 you, okay? All right. So those are the</p> <p>18 announcements I wanted to make for you make sure</p> <p>19 you have time to schedule what you needed to do.</p> <p>20 Now, I also want to go over, as we</p> <p>21 always do on Thursdays, our responsibilities, the</p> <p>22 responsibilities you have as jurors, okay, in this</p>
<p>4619</p> <p>1 sequence. Was it before I broke away or after, I</p> <p>2 don't remember. I just remember the lights of the</p> <p>3 ATV coming up. The island, two of the people who</p> <p>4 worked on the island for Johnny, CJ and Tara, they</p> <p>5 pulled up in the ATV. I remember the headlights.</p> <p>6 I remember separating from him -- or</p> <p>7 them kind of running up and saying something and</p> <p>8 separating us. And I didn't see Johnny for the</p> <p>9 rest of the evening is my recollection. I just</p> <p>10 found him the next day passed out in the cafe that</p> <p>11 was close to the house.</p> <p>12 THE COURT: Is that the end of --</p> <p>13 MS. BREDEHOFT: This is a good breaking</p> <p>14 point, yes.</p> <p>15 THE COURT: All right. Okay. Ladies</p> <p>16 and gentlemen -- you can just stay there for a</p> <p>17 moment. All right. Ladies and gentlemen, we're</p> <p>18 going to be breaking. Again, this is time that we</p> <p>19 break for a week, okay, so I won't be seeing you</p> <p>20 until May 16th. But I wanted to talk to you a</p> <p>21 little bit how the remainder of the case will</p> <p>22 progress, okay? All right. So we promised to get</p>	<p>4621</p> <p>1 case. All right. So you're not to read anything</p> <p>2 about this case. You are not to watch anything</p> <p>3 about this case. You're not to listen to anything</p> <p>4 about this case. This applies to television,</p> <p>5 newspapers, magazines, the Internet, and any</p> <p>6 online sites.</p> <p>7 Further, you're not to read, watch or</p> <p>8 listen to anything about this case on any social</p> <p>9 networking site such as Twitter, Facebook,</p> <p>10 Instagram, Snapchat, et cetera, or any similar</p> <p>11 sites. In addition, you must not communicate with</p> <p>12 anyone about the case, whether in person, over the</p> <p>13 phone, by email, text, or instant messaging, or by</p> <p>14 any other electronic or nonelectronic means. This</p> <p>15 includes friends, family, co-workers,</p> <p>16 acquaintances, and strangers.</p> <p>17 I also instruct you that you cannot do</p> <p>18 any research or make any inquires about this case,</p> <p>19 whether online or by any other means. What you</p> <p>20 learn about this case is limited to what you learn</p> <p>21 in the four walls of this courtroom when</p> <p>22 proceedings are underway, okay?</p>

Transcript of Jury Trial - Day 16
Conducted on May 5, 2022

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4625)

<p>1 So please enjoy your week off. Get 2 plenty of fresh air and rest. All right. And 3 then I'll see you at 9:00 a.m. on Monday, 4 May 16th, okay? All right, thank you. 5 (Whereupon, the jury exited the 6 courtroom and the following proceedings took 7 place.) 8 THE COURT: All right. And again, 9 ma'am, since you're still in the middle of your 10 testimony, you can't discuss your testimony with 11 anybody to include your attorneys, okay? You can 12 step down, though, and have a seat with your 13 attorneys. I have a few housekeeping matters I 14 want to take care of before we finish. 15 Okay. All right. First off, I would 16 just remind the litigants that no posting on 17 social media, no talking to the press, and I hope 18 you enjoy your week off. 19 To the attorneys, I won't see you 20 tomorrow for Friday depositions because we 21 finished all the depositions. I want to thank all 22 of you for last Friday staying here until -- I</p>	<p>4622</p> <p>1 right. All right. So plaintiff has used 35 hours 2 and 6 minutes. Defendants have use 36 hours and 3 31 minutes. Which means the plaintiff has 26 4 hours and 9 minutes left, and the defendant has 24 5 hours and 44 minutes left. 6 And just a reminder, as we said from 7 the very beginning, once time is up, once your 8 time is up, your time is up. If it's in the 9 middle of a witness, I'm going to stop you, okay? 10 So make sure. I mean, the 9-to-5 schedule when he 11 start back at May 15 will give us a little buffer, 12 but not much, so I will be keeping everyone on 13 task for those last two weeks, so keep in mind as 14 well. 15 Enjoy the next week. I don't 16 anticipate I will hear from you for this next 17 week. If there's an emergency, I understand that, 18 but just remember what my definition of an 19 emergency is, okay? We all remember that? All 20 right. Great. So other than that, does anybody 21 have anything else for me? 22 MS. BREDEHOFT: Yes, Your Honor. It's</p>
<p>4623</p> <p>1 think it was 9:00 at night, but we got them all 2 done, and I appreciate your work on that. It does 3 mean a lot. And now you're rewarded because you 4 don't have to see me tomorrow. So no more 5 depositions. What I'd also -- for planning 6 purposes, since we're going to be going 9 to 5, 7 the day's going to be a little bit different. So 8 we'll start at 9. We'll probably break for 9 morning break between 10:30 and 10:45. We're 10 going to break for lunch between 12:30 and 1:30, 11 so I want you to plan according for that. 12 Our afternoon break will probably be 13 between, I don't know, 3:15 to 3:30, maybe even a 14 little later, 3:45. We'll see. And then we'll 15 try to break at 5. There may be times when we 16 might go to 5:30, as I told the jury. So I just 17 want to make sure you know that. Since I won't 18 see you tomorrow, I want to go ahead and give you 19 your times as of this very minute of what you have 20 used and what you have left, okay? Are you ready? 21 Mr. Chew's going to try to do it with a 22 highlighter. That's sweet. There we go. That's</p>	<p>4625</p> <p>1 just a math question. I'm thinking we have 25.44, 2 as opposed to 24.44. 3 THE COURT: Sammy says 24. 4 MS. BREDEHOFT: They have 35.06, and we 5 have 36 point -- 6 THE COURT: If you add 36 hours and 31 7 minutes and 24 hours and 44 minutes, you get -- 8 MS. BREDEHOFT: 61.75. 9 THE COURT: You get what? 10 MS. BREDEHOFT: What is our allotment? 11 Is it 61? 12 THE COURT: Well, you can get with 13 Sammy when we're done, okay? Is it right or 14 wrong? 15 MS. BREDEHOFT: What's the total that 16 we've got. 17 THE COURT: What's that? 18 MS. BREDEHOFT: What's the total that 19 we have? 20 THE COURT: 61 hours and 15 minutes. 21 Does that add up then? That is right. 22 Mr. Rottenborn says I'm right. Okay. So that's</p>

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Transcript of Jury Trial - Day 16
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77 (4626 to
4629)

4626	1 the right time. 2 MS. BREDEHOFT: Thank you. 3 THE COURT: Sammy did it three times 4 over, so I thought that was right. You made him 5 very nervous. Okay. So that's good. Everything 6 else? Anything else? Yes, ma'am? 7 MS. VASQUEZ: Your Honor, we do have 8 your updated exhibit page that you requested -- 9 THE COURT: Oh, perfect. 10 MS. VASQUEZ: -- from plaintiff. May I 11 approach. 12 THE COURT: That's fine. I think 13 that's something Jamie needed. All right. We'll 14 get that. 15 MS. BREDEHOFT: Thank you, Your Honor. 16 THE COURT: All right. Anything else? 17 MS. BREDEHOFT: No, Your Honor. 18 MS. VASQUEZ: No, Your Honor. 19 THE COURT: All right. We'll see you 20 Monday, May 16th, 9 a.m., right? 21 MR. CHEW: Thank you, Your Honor. 22 Thank you very much.	4628	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 6th day 14 of May, 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
4627	1 THE COURT: Thank you. Have a good 2 day. 3 THE BAILIFF: All rise. 4 (Whereupon, the trial was recessed at 5 5:38 p.m. to reconvene at 9:00 a.m., Monday, May 6 16, 2022.) 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22		