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FAIRFAX, VA

Transcript of Jury Trial - Day 4

Date: April 14, 2022
Case: Depp, II -v- Heard

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WORLDWIDE COURT REPORTING & LITIGATION TECHNOLOGY

24682

Transcript of Jury Trial - Day 4
Conducted on April 14, 2022

1 (881 to 884)

881	883
<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 13 JURY TRIAL DAY 4 14 BEFORE THE HONORABLE PENNEY AZCARATE 15 Fairfax, Virginia 16 Thursday, April 14, 2022 17 10:00 a.m. EDT 18 19 20 Job No.: 443883 21 Pages: 881 - 1166 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 SAMUEL A. MONIZ, ESQUIRE 13 CAMILLE M. VASQUEZ, ESQUIRE 14 BROWN RUDNICK LLP 15 2211 Michelson Drive 16 7th Floor 17 Irvine, CA 92712 18 949.440.0234 19 20 21 22</p>
882	884
<p>1 Held at: 2 3 4 CIRCUIT COURT OF FAIRFAX COUNTY 5 4110 Chain Bridge Road 6 Courtroom 5F 7 Fairfax, Virginia 22030 8 703.691.7320 9 10 11 12 13 14 15 16 17 18 19 20 21 22</p>	<p>1 A P P E A R A N C E S C O N T I N U E D 2 3 REBECCA MACDOWELL LECAROS, ESQUIRE 4 BROWN RUDNICK LLP 5 One Financial Center 6 Boston, MA 02111 7 617.856.8149 8 9 ON BEHALF OF THE DEFENDANT AND COUNTERCLAIM 10 PLAINTIFF: 11 12 ELAINE CHARLSON BREDEHOFT, ESQUIRE 13 ADAM S. NADELHAFT, ESQUIRE 14 DAVID E. MURPHY, ESQUIRE 15 CHARLSON BREDEHOFT COHEN BROWN & 16 NADELHAFT, P.C. 17 11260 Roger Bacon Drive 18 Suite 201 19 Reston, VA 20190 20 703.318.6800 21 22</p>

885	887
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886	888
<p>1 CONTENTS</p> <p>2</p> <p>3 EXAMINATION OF KATHERINE OLWYN JAMES (VIA VIDEO) PAGE</p> <p>4 By Mr. Rottenborn 895</p> <p>5 By Ms. Vasquez 947</p> <p>6 By Mr. Rottenborn 978</p> <p>7</p> <p>8 EXAMINATION OF LAUREL ANDERSON, M.D. (VIA VIDEO) PAGE</p> <p>9 By Mr. Nadelhaft 982</p> <p>10 By Mr. Chew 997</p> <p>11 By Mr. Nadelhaft 1035</p> <p>12 By Mr. Chew 1038</p> <p>13</p> <p>14 EXAMINATION OF GEORGINA DEUTERS PAGE</p> <p>15 By Mr. Moniz 1044</p> <p>16</p> <p>17 EXAMINATION OF DAVID KIPPER, M.D. (VIA VIDEO) PAGE</p> <p>18 By Mr. Nadelhaft 1086</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>	<p>1 PROCEEDINGS</p> <p>2 THE BAILIFF: All rise.</p> <p>3 THE COURT: Good morning.</p> <p>4 MR. CHEW: Good morning, Your Honor.</p> <p>5 THE COURT: All right. The first thing</p> <p>6 I want to say is I get a call from my mother last</p> <p>7 night, and my mother-in-law, saying, "Why did you</p> <p>8 have your phone on the bench?" So I want to clear</p> <p>9 everything up. That was not my phone. That was a</p> <p>10 call through the computer system because I guess</p> <p>11 we have an open line to remote witnesses, so it</p> <p>12 came through the computer system. Jamie says it</p> <p>13 never happened before, came through the computer</p> <p>14 system and she hung up on it. So just for the</p> <p>15 record, that was not my phone.</p> <p>16 So I don't need that kind of grief from</p> <p>17 my mother, all right?</p> <p>18 Okay. All right. So I think before</p> <p>19 the jury comes out, we do have one issue with</p> <p>20 exhibits 2 -- Exhibit 548.</p> <p>21 MS. BREDEHOFT: It was plaintiff's</p> <p>22 exhibit.</p>

889	1 -- 2 THE COURT: Plaintiff's Exhibit 548, 3 okay. 4 So you had offered it to come into 5 evidence. 6 MS. BREDEHOFT: Yeah. 7 THE COURT: And I know there was an 8 objection there was a lot of hearsay on it. And 9 so is there a redacted copy for me? Or is that 10 something you haven't worked through? 11 MR. CHEW: We haven't seen it, Your 12 Honor. We could look at it during a break. 13 THE COURT: That's fine, Mr. Chew. I 14 think it was her witness, but that's fine. 15 MR. CHEW: Understood. 16 MS. BREDEHOFT: It was plaintiff's 17 exhibit, just so we're clear. 18 THE COURT: I know it was their 19 exhibit, but you're offering it, and so if you're 20 offering it, you have to redact it to basically -- 21 I think it says two. 22 MS. BREDEHOFT: I wanted to make sure	891	1 clarify the 48-hour rule that we had agreed to 2 with respect to the witnesses. 3 THE COURT: Okay. For witnesses? 4 MR. ROTTENBORN: So 48 hours ago, they 5 sent us an email saying that they anticipated Kate 6 James, Gina Deuters, Laurel Anderson, and Sean 7 Bett. Yesterday afternoon, or yesterday around 8 lunch, they said, "Given how quickly we're working 9 through the witnesses, we want to maybe add Kipper 10 and Lloyd." No issue with that, since, obviously, 11 we want to get through this trial. 12 THE COURT: We've already gone through 13 those depositions, right? 14 MR. ROTTENBORN: So I emailed them and 15 I asked for clarification, and I said, "Do you 16 mean those two in addition? Or were you planning 17 on -- to the four you were planning tomorrow?" 18 And yesterday at whenever, this 19 afternoon [sic], they said, "Yes, these are in 20 addition." Just this morning, they said, "Oh, 21 well, we're not going to do Sean Bett until 22 Monday, and we're going to replace him with
890	1 that -- in fact, I was going to bring that up 2 right away this morning, I wasn't sure of the 3 Court's ruling, so I didn't know what -- 4 THE COURT: Well, I just wanted to make 5 sure. I know that. 6 MS. LECAROZ: I think we need to work 7 out the details on that, Your Honor. 8 THE COURT: Okay. If you could work 9 out the details so you owe me one exhibit, so 10 we'll get that at some point today, right? Or 11 even, I guess, tomorrow when I see you guys, 12 that's fine. 13 MS. BREDEHOFT: I think we can do it 14 today. 15 THE COURT: Okay. Perfect. All right. 16 Anything else for me before the jury? 17 Mr. Rottenborn? 18 MR. ROTTENBORN: Just one brief matter, 19 Your Honor. May we approach? 20 THE COURT: Yes. That's fine. 21 (Sidebar.) 22 MR. ROTTENBORN: I just want to kind of	892	1 Dr. Kipper." 2 And I just want to get clarification. 3 I mean, if they're going to say they have more 4 time to prepare for Sean Bett. But it's more 5 complex than that because there's a deposition 6 designation. We have to have notice to fight over 7 the exhibits that are going to come in. 8 THE COURT: Right. 9 MR. ROTTENBORN: There's some 10 gamesmanship in them telling me yesterday 11 afternoon at 5:00 p.m., "These are in addition," 12 and then today saying, "No. By the way, we're 13 going to take out one of the people in the middle 14 of the day, and it's going to be a live witness." 15 So I just wanted to raise that with 16 Your Honor. 17 THE COURT: Well, I understand your 18 concerns. But, you know, trials are very fluid. 19 And I think 48 is helpful for everybody, I think, 20 and I think as long as, as soon as you know -- and 21 I think this will be for your side too -- 22 MR. CHEW: We did that, Your Honor.

Transcript of Jury Trial - Day 4
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4 (893 to 896)

893	895
1 And they will have more time to prepare for Mr. --	1 EXAMINATION BY COUNSEL FOR THE DEFENDANT
2 THE COURT: Well, I understand that.	2 BY MR. ROTTENBORN:
3 That's a little bit beside the point. I get the	3 Q Good morning, Ms. James. Can you
4 feeling.	4 please say your full name.
5 MR. ROTTENBORN: I think the problem	5 A My name is Katherine Olwyn James.
6 was trying to confirm yesterday afternoon. And	6 Q What's your current address?
7 it's fine for today.	7 Have you ever spoken with Ms. Vasquez
8 THE COURT: Okay.	8 before today?
9 MR. ROTTENBORN: I just wanted to make	9 A Yes.
10 sure that we're all clear, that --	10 Q When?
11 THE COURT: Right. You're going to	11 A I don't recall.
12 do --	12 Q What was the substance of that
13 MS. VASQUEZ: We're going to do our	13 conversation?
14 very best.	14 A I don't recall.
15 THE COURT: Very best. Okay.	15 Q Is it in the past month?
16 MR. CHEW: Your Honor, there's no	16 A No.
17 gamesmanship.	17 Q Is it in the past year?
18 MS. VASQUEZ: It's hard, really.	18 A Yes.
19 THE COURT: Okay.	19 Q Did you talk about this case?
20 MR. ROTTENBORN: Thank you, Your Honor.	20 A No.
21 THE COURT: Thank you.	21 Q What did you talk about?
22 (Open court.)	22 A I don't recall.
894	896
1 Okay. Are we ready for the jury?	1 Q If you don't recall, how can you recall
2 MR. CHEW: Yes, Your Honor.	2 that you didn't discuss this case?
3 THE COURT: Okay.	3 Have you discussed the case or the U.K.
4 (Whereupon, the jury entered the	4 litigation with Mr. Waldman?
5 courtroom and the following proceedings took	5 A I just -- yes, I discussed the U.K.
6 place.)	6 case with Mr. Waldman.
7 THE COURT: Good morning, ladies and	7 Q What did you discuss about the U.K.
8 gentlemen.	8 case with Mr. Waldman?
9 THE JURY: Good morning.	9 MR. NADELHAFT: Your Honor, can we stop
10 Your next witness.	10 this, please?
11 MR. CHEW: Good morning, your Honor.	11 THE COURT: Okay. Can you pause,
12 Our first witness is Kate James by videotape.	12 please. You can -- there you go. Do you want to
13 THE COURT: Okay. By video. I wish I	13 approach?
14 would have known that two seconds earlier. Can	14 MR. ROTTENBORN: Sure.
15 you get the screen up? I like to get the screen	15 (Sidebar.)
16 up before -- we usually try to get the screen up	16 THE COURT: I'm not sure.
17 before, because of that, the sound, but we'll get	17 MR. ROTTENBORN: This doesn't have all
18 it up for you.	18 the testimony that Your Honor let in. This is
19 MS. VASQUEZ: One moment, Your Honor,	19 biased testimony that we --
20 there's some issues.	20 THE COURT: Hold on. Hold on. Okay.
21 THE COURT: All right.	21 MR. ROTTENBORN: Sorry. Your Honor let
22	22 in this testimony that goes to bias, and they

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5 (897 to 900)

897	1 didn't put it in the video. 2 MS. VASQUEZ: We sent it to Planet 3 Depos, and we always -- the videos are sent to 4 both sides. 5 THE COURT: Did you review this video 6 ahead of time? 7 MR. ROTTENBORN: I didn't. I mean, 8 they're the ones responsible for preparing it. I 9 mean, I would ask that this be at least read for 10 the jury by -- 11 THE COURT: That's fine. Any objection 12 to that? 13 MS. VASQUEZ: No, of course not. 14 MR. CHEW: No objection. 15 THE COURT: But, I mean, both sides 16 need to get the -- 17 MR. ROTTENBORN: We will do our best to 18 try to confirm, but, I mean -- 19 MS. VASQUEZ: We didn't do anything. 20 We sent you the transcripts. We sent both sides 21 the transcript. 22 MR. CHEW: I'm not blaming. I just want	899	1 (Open court.) 2 THE COURT: Ladies and gentlemen, in 3 addition to the video deposition, there are some 4 extra statements that this witness made that 5 aren't part of the video but is part of her 6 testimony. So Mr. Rottenborn is just going to 7 read those into the record and for you as well, 8 okay? 9 MR. ROTTENBORN: QUESTION: Have you 10 spoken with Adam Waldman before? 11 ANSWER: Yes. 12 QUESTION: When was the last time you 13 spoke with him? 14 ANSWER: I don't recall. 15 QUESTION: How many times have you 16 spoken with him? 17 ANSWER: I would say somewhere around 18 ten times total. 19 QUESTION: Have you spoken with him in 20 2022? 21 ANSWER: Yes. 22 QUESTION: What was the substance of
898	1 to make sure -- 2 THE COURT: Okay. Okay. 3 MR. CHEW: We have no objection to 4 that. 5 THE COURT: Do you want to read that 6 now? Or would you like to wait? 7 MR. ROTTENBORN: Yes. 8 THE COURT: Okay. All right. And if 9 you see any other issues, let me know. 10 MR. ROTTENBORN: Okay. How would you 11 like us to read it? 12 THE COURT: I will just tell the jury 13 that there are additional parts of the deposition 14 that you're going to read into the record. 15 Is that okay if you read it in? 16 MR. ROTTENBORN: Yeah. And do you 17 want -- because this came in too. So you want me 18 to read up to there? I think your counter. 19 MS. VASQUEZ: Okay. Sure. That's 20 fine. Thank you. 21 THE COURT: Sure. Okay. 22 MR. ROTTENBORN: Thank you, Your Honor.	900	1 that conversation? 2 ANSWER: Friendly banter. 3 QUESTION: About what? 4 ANSWER: Nothing to do with the case at 5 all. 6 QUESTION: What was it about? 7 ANSWER: We had gotten to know each 8 other, and, you know, I was on vacation, said 9 "Happy new year." That's it. 10 QUESTION: Did you call him? Or did he 11 call you? 12 ANSWER: I didn't call him. 13 QUESTION: Did you text him? 14 ANSWER: I sent a message saying, 15 "Happy new year" to a lot of my friends. 16 QUESTION: Over text? 17 ANSWER: Yes. 18 THE COURT: All right. Thank you, sir. 19 All right. You can continue with the video. 20 BY MR. ROTTENBORN: 21 Q Did Mr. Waldman assist you in preparing 22 your witness statements for the U.K. litigation?

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<p>901</p> <p>1 A No.</p> <p>2 Q Did you exchange drafts of those</p> <p>3 statements with Mr. Waldman?</p> <p>4 A No.</p> <p>5 Q Who did you send those drafts to?</p> <p>6 A Schillings.</p> <p>7 Q Is every word in those witness</p> <p>8 statements words that you drafted?</p> <p>9 A Yes.</p> <p>10 Q Did anyone provide edits to those</p> <p>11 witness statements for your consideration?</p> <p>12 A I'm very good at my own editing, I can</p> <p>13 assure you.</p> <p>14 Q That didn't answer my question. Did</p> <p>15 anyone else provide edits to those witness</p> <p>16 statements for you?</p> <p>17 A No.</p> <p>18 Q Now, you've spoken with Mr. Depp since</p> <p>19 he and Amber have gotten divorced, correct?</p> <p>20 A Correct.</p> <p>21 Q When was the last time you spoke with</p> <p>22 him? You can answer.</p>	<p>903</p> <p>1 Q When were you hired by Ms. Heard?</p> <p>2 A In 2012.</p> <p>3 Q How did you meet her?</p> <p>4 A Her sister put an ad through, you know,</p> <p>5 a recruitment system I use in my field.</p> <p>6 Q Take me through your, the chronology</p> <p>7 of -- well, let me ask it this way: When did</p> <p>8 you -- would you describe your work for Ms. Heard</p> <p>9 as a personal assistant? Is that what you call</p> <p>10 your job title?</p> <p>11 A Yes.</p> <p>12 Q When did you first start working as a</p> <p>13 personal assistant?</p> <p>14 A In 1999.</p> <p>15 Q For how many people have you served as</p> <p>16 personal assistant?</p> <p>17 A Maybe six.</p> <p>18 Q Since you left Ms. Heard's employment</p> <p>19 in 2015, for how many people have you served as a</p> <p>20 personal assistant?</p> <p>21 A One. That's the same person I work for</p> <p>22 to this day. I've been with him for six and a</p>
<p>902</p> <p>1 A I don't recall.</p> <p>2 Q Was it within the past year?</p> <p>3 A No.</p> <p>4 Q In any day prior to today, have you</p> <p>5 exchanged text messages with Mr. Depp?</p> <p>6 A Yes.</p> <p>7 Q When was the last time, approximately,</p> <p>8 that you exchanged text messages with Mr. Depp?</p> <p>9 A I would say 2016. Yeah, I think 2016.</p> <p>10 But it's just a long time ago.</p> <p>11 Q When was the last time you spoke with</p> <p>12 Amber Heard?</p> <p>13 A I don't recall when.</p> <p>14 Q Was it shortly after your employment</p> <p>15 with her ended in 2015?</p> <p>16 A No.</p> <p>17 Q Was it after that?</p> <p>18 A No.</p> <p>19 Q Have you spoken with her, to the best</p> <p>20 of your recollection, or communicated with her in</p> <p>21 any way in the past, say, five years?</p> <p>22 A No.</p>	<p>904</p> <p>1 half years.</p> <p>2 Q Ms. James, have you had any other jobs</p> <p>3 since -- other than this personal assistant job,</p> <p>4 since you left Ms. Heard's employment?</p> <p>5 A No.</p> <p>6 Q And your work for Ms. Heard, was it</p> <p>7 part-time or full-time?</p> <p>8 A It started as part-time and became</p> <p>9 full-time.</p> <p>10 Q When did you change from part-time to</p> <p>11 full-time?</p> <p>12 A I don't recall.</p> <p>13 Q What were your job duties?</p> <p>14 A Too many to mention.</p> <p>15 Q Give me your best summary of what your</p> <p>16 job duties were, please.</p> <p>17 A Is this relevant? Okay. So, let's</p> <p>18 see, I mean if you're ready for a really, really</p> <p>19 long time of me explaining the details, that's</p> <p>20 fine.</p> <p>21 It's everything you could possibly do</p> <p>22 to run someone's life, okay? So it is grocery</p>

905

1 shopping. It is taking care of admin. It is
2 running errands. It is getting the car fixed. It
3 is getting the dogs groomed. It is picking up
4 flowers. It is dealing with the decorator. It is
5 dealing with the housekeeper. It is going on and
6 on and on and on, and it goes on every single day.
7 Arranging travel, dealing with all of
8 the surplus stuff around the travel, booking all
9 the places, the changing of travel, okay?
10 Liaising with people that she's working with on
11 films, updating her calendar accordingly, liaising
12 with the people on set every single day to update
13 her calendar to make sure that she knows what
14 scene she's doing each day, what her call time is.
15 Every day it's something different. But it's a
16 long -- a myriad, a myriad of things that go
17 across the board daily.
18 Q You were paid for that work, correct?
19 A Very poorly.
20 Q What were you paid? Was it \$1,500 a
21 week to start?
22 A Are you kidding? Oh, I wish. My God.

906

1 No, it was not. She paid me \$25 an hour to start
2 off with, and she finally agreed, after screaming
3 at me that she would pay me \$50,000 a year once I
4 went to full-time. And this was after me working
5 for well over ten years as a personal assistant.
6 So it was very insulting to me, but I did it
7 anyway because I had grandfathered in the ability
8 to pick up my son from school and bring him to
9 work with me at 3:00.
10 Q And you could have left Ms. Heard's
11 employment at any time, correct?
12 A Yes.
13 Q You were based in Los Angeles when you
14 were providing personal assistant services to
15 Ms. Heard, right?
16 A I have always lived in Los Angeles
17 since 1999.
18 Q So you didn't travel with Ms. Heard
19 when she was out of town, correct?
20 A That was another part of our agreement,
21 that I wouldn't travel with her because of my
22 child.

907

1 Q And she was out of town quite a bit,
2 right?
3 A Not really.
4 Q Not really? How many weeks a year
5 would you estimate Ms. Heard was out of town while
6 you worked for her?
7 A Well, you're talking almost ten years
8 ago, so I can't tell you, quite honestly.
9 Q When she was out of town, you wouldn't
10 see -- you never traveled with her, right?
11 A No.
12 Q How much did you see Mr. Depp over the
13 course of your employment with Ms. Heard?
14 A Regularly.
15 Q How many times -- obvious you didn't
16 see him when he was out of town, right?
17 A No.
18 Q When he was in town, was it -- would
19 you see him daily, weekly, monthly? What would
20 you estimate?
21 A There's no rhyme or reason to answer
22 that question.

908

1 Q Now, you never witnessed any violence
2 between Ms. Heard or Mr. Depp, right?
3 A No.
4 Q And Ms. Heard never told you that she
5 had been violent to Mr. Depp, correct?
6 A No.
7 Q You had knowledge that Ms. Heard and
8 Mr. Depp had arguments, correct?
9 A No.
10 Q Ms. Heard never told you that she
11 had -- and Mr. Depp had had arguments?
12 A Occasionally she'd send a text message
13 complaining about her mental state. It was never
14 clear exactly what was going on. It was mostly --
15 Q So you never -- I'm sorry.
16 A I remember she would text me
17 complaining about her mental state, and that was
18 about it. I don't have any of the text messages,
19 so it's hard to remember.
20 Q Do you recall hearing anything about an
21 alleged incident between Amber and Johnny on a
22 flight from Boston to LA around this time frame?

<p style="text-align: right;">909</p> <p>1 A Like I said, I remember that day very 2 well. 3 Q And to follow up on that, I'm not 4 asking just about what Amber may have told you. 5 I'm just trying to drill down, generally, to what 6 you may have heard, whether from Amber or Johnny 7 or anyone about that flight. 8 Does that make sense? 9 So can you tell us what do you remember 10 hearing about that flight or what happened or 11 didn't happen on that flight from Boston to LA? 12 A Don't know. 13 Q Sitting here today, you don't remember 14 anything that you've heard about that? 15 A I don't know. I wasn't on the plane. 16 I just know what happened afterwards, okay, when 17 she asked me to meet her at the shuttle. 18 Q Did you think to ask her if she was 19 okay? 20 A You know, I probably did because that's 21 my role, to play a caregiver. That's all I can 22 imagine.</p>	<p style="text-align: right;">911</p> <p>1 question is in relation to, but he wasn't there at 2 that time, if that's what you're referring to. 3 Q Yeah, no, that's not my question. My 4 question was just over the course of your 5 employment, you have knowledge of Mr. Depp 6 spending time at that Orange Avenue apartment, 7 right? 8 A They spent time there and at each 9 residence. They would go around, yeah. 10 Q Were you concerned about Ms. Heard and 11 her well-being on that day? 12 A No. Because it had become a pattern 13 with her, and so I was merely placating her, I 14 would say, and especially when I saw she was there 15 with about four or five girlfriends and basically 16 having fun, enjoying each other down by the pool. 17 That's why she needed her swimsuit, and then they 18 proceeded to hang out drinking while I sat around 19 waiting and -- with my son, actually, I think it 20 was a Sunday that day, I remember. 21 We had to wait all day while they were 22 just home around -- drinking around the pool.</p>
<p style="text-align: right;">910</p> <p>1 Q So what do you remember about this day 2 that you alluded to earlier? 3 A Mostly my surprise that they went to 4 the Chateau Marmont because Amber had an apartment 5 of her own in West Hollywood that was very 6 completely set up and available to her. So that 7 was my biggest confusion, that why did she go to 8 the Chateau. And then she asked me to get her 9 bathing suit. I remember that. So I had to go to 10 her apartment to get her bathing suit, which, 11 again, seemed strange to me. And then, what also 12 seemed strange is when I got there, she had a 13 bunch of friends with her and originally I thought 14 she was alone. 15 Q When you were referred to Amber's 16 apartment, are you referring to the apartment on 17 Orange Avenue? 18 A Yes, yes. 19 Q And isn't it true that Mr. Depp would 20 spend time in that apartment with Amber from time 21 to time, correct? 22 A Well, I don't really know what the</p>	<p style="text-align: right;">912</p> <p>1 Finally, I went home, and finally, she went back 2 to her apartment and then she wanted me to go back 3 and pack her bags with her about 10:00 at night on 4 Sunday. I said I couldn't go with her. By that 5 time, I'd spent the whole day sitting there, so I 6 said I couldn't go to pack her bags because I had 7 already put my son to bed, and she was very angry 8 about that. I remember that. 9 Q Okay. So, let's -- so when you asked 10 her if she was okay, you didn't actually care if 11 she was okay; you said you were just placating 12 her, right? 13 A It was a standard procedure at this 14 point. She was a very dramatic person. 15 Q So you didn't actually think that there 16 was anything that -- that Amber was actually 17 upset, correct? 18 A As I said, it just didn't make sense 19 that she went to the Chateau instead of going 20 home. That was the first red flag to me right 21 there, you know. 22 Q So you came to the conclusion that day</p>

<p>1 that any -- she actually wasn't upset; is that 2 what you're saying? 3 A It's too much. I mean, it really was. 4 Q What I'm asking is did you come to the 5 conclusion that there was nothing wrong with 6 Ms. Heard that day and that she wasn't actually 7 upset? 8 A I don't know how to answer such a 9 strange question. Like I said, you already asked 10 me and I already answered. 11 Q I'm asking you to answer it again. I 12 don't think I asked the exact same question, but 13 do your best, please. 14 A Could you ask me the question in a 15 different way or a clearer way that is not exactly 16 the same as the last question you asked me? 17 Q Did you reach the conclusion that day 18 that Ms. Heard hadn't experienced anything 19 traumatic? 20 A Over the course of the day, I observed 21 Ms. Heard enjoying the company of her friends for 22 several hours. That's all I have to say on that</p>	<p>913</p>	<p>1 Food is not a priority for me. 2 Q Did you -- would you have put that on 3 Ms. Heard's tab that day? 4 A Everything was on Depp's tab that day, 5 so, no. 6 Q On Johnny's tab? 7 A Yes. 8 MR. ROTTENBORN: Let's bring up the 9 document entitled -- or that ends in -6151 please. 10 Q When she wrote "I love you," and you 11 wrote, "Love you too, hon. Won't be long, X," was 12 that just placating Ms. Heard? 13 A That is a friendly text exchange in my 14 role of work. 15 Q Were you trying to be supportive at all 16 or just placating her? 17 A It would be to both, I guess. 18 Q Did you have any concern whatsoever 19 about Ms. Heard's well-being that day? 20 A No. 21 Q When was the first time you remember 22 Ms. Heard telling you that all wasn't right in the</p>	<p>915</p>
<p>1 matter. 2 Q And would it be odd for someone who's 3 experienced trauma to want to be around friends to 4 you? 5 A I don't know. 6 Q So in any event, you said you sat 7 around the Chateau Marmont; is that right? 8 A Yes. While she was deciding what to 9 do. 10 Q Now, you were being paid for that time, 11 correct? 12 A Not overtime. It was a Sunday. I was 13 not being paid, no. 14 Q Did you avail yourself of anything at 15 the hotel, like did you order any food? 16 A No. 17 Q Did you -- 18 A I might have ordered some food for my 19 son, actually, to be honest now that I think about 20 it because he was little at the time, I think he 21 was, you know, five or something. So I might have 22 ordered food for my son. I'm not a big eater.</p>	<p>914</p>	<p>1 relationship between her and Mr. Depp? 2 A I don't recall exactly when it started, 3 but it was usually her complaining and crying due 4 to, I would say, insecurities within the 5 relationship more than anything else. She would 6 be very, very insecure, most of the time, and she 7 would call me up crying. 8 I remember one time she called me when 9 she was alone in New York City, and she was 10 crying, lurking on the streets crying, and he 11 wasn't there. She was alone. I told her that she 12 needed to go inside because I was worried that the 13 paparazzi might take a photo of her. And she was 14 in a very disregulated state. And so just out of 15 kindness, I told her to go inside rather than 16 walking around crying in public. I remember that, 17 but I don't remember exactly when that it was. It 18 might have been 2012 or 2013. 19 As the job went on, we called each 20 other less and less and did mostly text messaging. 21 It was all text messaging we did. 22 Q Did you ever believe that Mr. Depp</p>	<p>916</p>

917	1 mistreated her? 2 A No. 3 Q So -- and why not? 4 A Just never had any evidence of it at 5 all. I was there almost daily, in both her place 6 and then eventually at his place, and ultimately 7 at the Lofts downtown. It was a daily basis 8 experience, morning, noon, night, all days of the 9 week. So, you know, I mean, I never once saw any 10 evidence of anything. 11 Q Did Ms. Heard ever tell you that Johnny 12 had hit her? 13 A No. 14 Q Did she ever tell you that Johnny had 15 pulled her hair or pushed her? 16 A No. 17 Q Let me ask it a little bit differently. 18 A Okay. 19 Q You never believed Ms. Heard that 20 Mr. Depp had mistreated her; is that correct? 21 A At the time or after? I never believed 22 it in what context are you talking about? During	919	1 Q Well, I'm trying to understand what 2 your testimony is. Maybe you could clarify for 3 me, Ms. James. 4 Is your testimony that if you never saw 5 firsthand evidence of Johnny being violent to 6 Amber, that it couldn't have happened? 7 A That's not what I said. You're trying 8 to put words into my mouth. I don't appreciate 9 that. 10 MR. ROTTENBORN: Can you pull up the 11 document that is, well, let me see what it ends 12 with here. Depp -11432, please. 13 Your Honor, can we -- 14 THE COURT: Can we pause for a moment. 15 Okay. 16 MR. ROTTENBORN: This is a document 17 that we're just waiting for the corresponding 18 trial exhibit, so if you could just bear with us 19 for one minute, and then we'd like to move for 20 admission of it. 21 THE COURT: All right. What's the 22 number on it?
918	1 my employ or afterward? 2 Q During your employ. 3 A No. Never. And there was never any 4 damage to the apartment that I witnessed. There 5 was never any aftermath of anything, ever, that I 6 ever saw. 7 Q Now you, of course, have no personal 8 knowledge one way or the other whether Johnny ever 9 was abusive to her, correct? 10 A Well, I don't know if that's 11 necessarily true because if it was true, I would 12 have seen the damage, even if I wasn't physically 13 present in the moment of these alleged arguments. 14 Q And what's your basis for that 15 statement? 16 A Well, if someone's being beaten, 17 there's generally physical evidence. 18 Q So it's your testimony if there was no 19 physical evidence that you observed, then it 20 couldn't have happened, the domestic violence by 21 Johnny toward Amber; is that your testimony? 22 A No.	920	1 MR. ROTTENBORN: That's what we're 2 trying to figure out, sorry for the delay. 3 Your Honor, it's Trial Exhibit 844. 4 THE COURT: All right. And that's 5 Defendant's 844? 6 MR. ROTTENBORN: Yes, ma'am. 7 THE COURT: Okay. 844. Any objection 8 to 844? 9 MS. VASQUEZ: Yes, Your Honor, many 10 objections. 11 THE COURT: All right. You want to 12 approach, then, if somebody has a copy of 844 for 13 me. We'll get it. 14 MR. ROTTENBORN: We can pull it up 15 electronically. 16 THE COURT: That's all right. We'll 17 get it. 18 (Sidebar.) 19 MR. ROTTENBORN: It's just a lot of 20 text that we're looking to admit. So, obviously, 21 we could redact all of it. 22 MR. CHEW: Could you wait until we get

Transcript of Jury Trial - Day 4
Conducted on April 14, 2022

11 (921 to 924)

<p style="text-align: right;">921</p> <p>1 up here before you start addressing? 2 MR. ROTTENBORN: Sure. Sorry. 3 THE COURT: All right. 844. Okay. I 4 have 844. All right. So are you asking to move 5 this into evidence? 6 MR. ROTTENBORN: With just the bottom 7 text with everything else redacted. 8 THE COURT: Just this one text? 9 MR. ROTTENBORN: Yes, Your Honor. 10 THE COURT: Who is this with? 11 MR. ROTTENBORN: It's Mr. Depp's 12 writing. Ms. James. If you want to do it in a 13 couple minutes when she testifies that it's a text 14 from Mr. Depp to her, we can do that. 15 THE COURT: Is it the second page? 16 Because this one says Ms. Dembrowski. 17 MR. ROTTENBORN: He texted -- Chris 18 Dembrowski is Mr. Depp. 19 THE COURT: Okay. I did not know that. 20 Sorry. 21 Okay. So you want this one text. 22 She's about to say that she got this text from</p>	<p style="text-align: right;">923</p> <p>1 MR. CHEW: But it still goes to 2 character. 3 MS. VASQUEZ: Well, I understand. It 4 still goes to character. We're still saying it's 5 improper character, Your Honor. And, you know, to 6 the extent that Your Honor would allow us to bring 7 in a bit more background on Mr. Depp and his good 8 behavior, with some of our witnesses, you know, to 9 be able to offer this... 10 MR. ROTTENBORN: We'll take that as 11 a -- 12 MS. VASQUEZ: It's a proper -- 13 MR. ROTTENBORN: But if he's reaching 14 out to one of the witnesses and saying, "Come over 15 and we'll," you know, do that, that's party 16 admission, and relevance and bias, prejudice. All 17 sorts of things, for this extent. I mean, we can 18 take whatever they want to try to get in later, 19 but I don't think -- 20 MS. VASQUEZ: We just think it's 21 unfairly prejudicial and improper character 22 evidence.</p>
<p style="text-align: right;">922</p> <p>1 Mr. Depp? 2 MR. ROTTENBORN: Yes, Your Honor. 3 MS. VASQUEZ: May we -- sorry, Your 4 Honor. Do you have a copy of it? I'm sorry, Your 5 Honor. 6 THE COURT: Looks like it's the very 7 bottom. 8 MR. ROTTENBORN: I'm so sorry. I'll 9 try to be better. 10 THE COURT: It's Judy's microphone. If 11 you break it, you've got to deal with Judy. 12 MR. CHEW: We will definitely not touch 13 Judy's microphone. 14 MS. VASQUEZ: Yeah. I mean, our 15 objections to this is that it's improper character 16 evidence, Your Honor. They're trying to get in 17 evidence of Mr. Depp's bad behavior via text 18 messages, and yet we can't bring in any evidence 19 of his good behavior. 20 THE COURT: Well, that's kind of how 21 party admissions go, party opponents go. I mean, 22 it's hearsay, but it's a party opponent.</p>	<p style="text-align: right;">924</p> <p>1 THE COURT: I understand your 2 objections. I'm going to overrule the objections. 3 You owe me a redaction for this, though, before we 4 can show it to the jury. 5 MR. ROTTENBORN: Would it be okay if, 6 for now, we do like we did -- we'll prepare a 7 redacted exhibit but we do like we did with 8 Ms. Dembrowski's texts the other day, where we 9 showed this part right here? 10 THE COURT: Okay. Any objection just 11 to that? 12 MS. VASQUEZ: Just making sure -- 13 THE COURT: Just make sure that they 14 show it to you. 15 MS. VASQUEZ: Yes, Your Honor. 16 MR. CHEW: And if you could have 17 somebody else -- this is not an insult at all, 18 but, I mean, if you could have somebody else also 19 look at it and give us a chance look at it, 20 because last time you and I both missed a personal 21 identifier. 22 THE COURT: Okay. Yeah. That's fine.</p>

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925	1 The problem you'll have to switch it 2 like we did with the security tapes with the other 3 depositions. They can't see her at the same time 4 that they see this. You understand? 5 MR. ROTTENBORN: Okay. Why don't we -- 6 there's probably a few more questions that will 7 key it up so that they'll know what they're 8 looking at, and then I'll stand up and ask -- 9 MR. NADELHAFT: Pause the video? 10 THE COURT: And your objections are 11 noted. 12 MR. CHEW: Thank you, Your Honor. 13 MR. ROTTENBORN: Thank you, Your Honor. 14 (Open court.) 15 MR. ROTTENBORN: Can you just wait one 16 minute before you start, please. 17 BY MR. ROTTENBORN: 18 Q -- box at the bottom -- 19 A Uh-huh. 20 Q -- do you see your name, Kate, in that 21 column labeled "participants"? 22 A Yes, uh-huh.	927	1 THE COURT: Well, switch to -- okay. 2 That's fine. 3 MR. ROTTENBORN: Thank you. 4 THE COURT: Make sure it's set right 5 before you publish it. All right. 6 MR. ROTTENBORN: Your Honor, with the 7 stipulation that we'll prepare a redacted version 8 to be entered into evidence that has other 9 personal identifiers redacted, we'd ask for 10 permission to admit this into evidence and publish 11 it to the jury. 12 THE COURT: The objections are noted, 13 and we'll get the redacted copy. All right. 14 MR. ROTTENBORN: Thank you, Your Honor. 15 Can you blow it up, Heather. 16 THE COURT: All right, sir. Are we 17 ready to continue? 18 MR. ROTTENBORN: Ready to resume with 19 the video. Thank you, Your Honor. 20 THE COURT: All right. 21 BY MR. ROTTENBORN: 22 Q Do you see where he says, "Will hit you
926	1 Q Is this a text message that you 2 received from Mr. Depp on or around August 13th, 3 2016? 4 A Yes. 5 Q And it appears that he's responding to 6 something that you had sent him, correct? 7 A I don't know. 8 Q You see where he says "Thank you, 9 sweetheart"? 10 A Yes. 11 Q He's directing that to you, right? 12 A It looks like there's someone else cc'd 13 on this text, so it could be to that person. I 14 honestly don't know. I cannot answer your 15 question. 16 MR. ROTTENBORN: Can we please pause 17 the video. 18 THE COURT: All right. Can you pause 19 for a second, please. Thank you. He already did. 20 That was good. Thank you. 21 MR. ROTTENBORN: Your Honor, I would 22 like to switch to our --	928	1 when I get back, doll. Come over for a spot of 2 purple, and we'll fix her flabby ass nice and 3 good"? 4 A Yep. 5 Q "Come over for a spot of purple" means 6 come over for a drink of wine, right? 7 A I don't know. 8 Q That's what you understood it to mean, 9 correct? 10 A I don't know. 11 Q That's what you understood it to mean, 12 correct? 13 A I don't know. 14 MR. ROTTENBORN: Lucien, can you pull 15 up the document labeled "U.K. trial, day seven, 16 James testimony," please. 17 Q Ms. James, you remember giving 18 testimony in the trial in the U.K., right? 19 A Well, there'd be something wrong with 20 me if I didn't. 21 THE COURT: I need order in the court. 22 Q When you gave that testimony, you gave

929	931
<p>1 it under oath, correct? 2 A Yes. Yes. 3 MR. ROTTENBORN: Lucien, can you please 4 go to page 39 of the PDF. And can you please blow 5 up the page that is labeled 1221. 6 Q On line 7, Ms. James, am I reading this 7 right that you were asked a question and he is 8 inviting you over for a spot of purple? What is 9 that? 10 "Yes" is your answer. 11 Question: What did you understand? 12 And your answer, "Red wine, I imagine." 13 Do you see that? 14 Yeah, I do remember that. 15 Do you remember giving that testimony? 16 A Uh-huh, yeah. 17 Q So is it your understanding that 18 Mr. Depp was inviting you over for wine at some 19 point after he split up from Ms. Heard? 20 A And just speculation. 21 Q Did you meet up with Mr. Depp for red 22 wine around the time period of this text on</p>	<p>1 MR. ROTTENBORN: Lucien, if you can 2 just pull up the prior testimony that we just 3 looked at. 4 Q Ms. James, isn't it true that on 5 line 12 of page 1221, you were asked the question, 6 "Red wine, and not only to come over for a spot of 7 purple but to fix her flabby ass, that was about 8 Ms. Heard, was it not?" 9 And on line 14, you answered "Yes, 10 yes." 11 Do you see that? 12 A Yes. Uh-huh. 13 Q So you did understand this to be 14 referring to Ms. Heard, correct? 15 A No. 16 Q I'm sorry. You said no? 17 A Just trying to be agreeable in the 18 court, having no clue what on Earth is going on. 19 So there you go. I have no clue. 20 Q Was that answer in the court truthful 21 or just agreeable? 22 A Just being agreeable.</p>
930	932
<p>1 August 13th, 2016? 2 A I did meet up with him, but we did not 3 drink red wine, no. 4 Q Was anyone else present for that 5 meeting? 6 A No. 7 Q When he said "Come over for a spot of 8 purple, and we'll fix her flabby ass," you 9 understand him to be referring to Ms. Heard when 10 he said "we'll fix her flabby ass," correct? 11 A Yeah. It wasn't for me to speculate 12 what he was referring to. 13 Q And I'm not asking for you to speculate 14 what he was referring to; I'm asking for your 15 understanding was that he was talking about 16 Ms. Heard, correct? 17 You can answer. 18 A There isn't an answer. I mean, this is 19 the way he writes. It's very random and you don't 20 sit and question it, okay? It's the way he 21 writes. He writes in a very abstract way. 22 Q Okay.</p>	<p>1 Q So it wasn't truthful? You can answer. 2 A I don't have an answer for you, 3 Mr. Rottenborn. 4 Q What did you and Mr. Depp talk about at 5 that meeting that you recall? 6 A I don't recall details. 7 Q Just tell me generally everything you 8 recall. 9 A It's too long ago, Mr. Rottenborn. I 10 don't recall. 11 Q Do you recall anything? 12 A No. 13 Q Where was the meeting? 14 A At his residence in West Hollywood. 15 COURT REPORTER: Is that his residence? 16 What? I'm sorry. 17 THE WITNESS: In West Hollywood. 18 Q What time of day? 19 A About 3:00 p.m. 20 Q So you recall the time of day, but you 21 don't recall anything you discussed? 22 A No. I'm just saying I know it was in</p>

<p style="text-align: right;">933</p> <p>1 the afternoon because it was after I picked my son 2 up from school because my son went to swim in the 3 pool with the security guard watching him while I 4 went and had a brief conversation with Mr. Depp. 5 That's the only reason I remember the time. 6 Q Did you talk about Ms. Heard? 7 A Yes. 8 Q What did you discuss about Ms. Heard? 9 A Well, like I said, I don't recall the 10 details. 11 Q Well, I'm just a little confused 12 because you just testified you didn't remember 13 anything, but now you remember that you did talk 14 about Ms. Heard. So what I'm trying to get is 15 everything you remember about the conversation. 16 A Well, you've got to understand, 17 Mr. Rottenborn, the mutual connection between 18 Mr. Depp and myself is, in fact, Ms. Heard. So 19 inevitably that is going to be part of the 20 conversation. That's all I remember. Okay? 21 Q Do you remember anything else about 22 that conversation with Mr. Depp?</p>	<p style="text-align: right;">935</p> <p>1 care for people, correct? 2 A I'm not a human nurse, if that's your 3 question. I don't really understand your 4 question. 5 Q Sorry. You don't have any training 6 related to prescription drugs, do you? 7 A No. 8 Q And you have no basis -- 9 A Excuse me. Only pertaining to animals, 10 yes. I would like to add that. 11 Q Okay. And that was the training that 12 you received on the job in Australia before you 13 came to the US? 14 A Amongst other things, yes. 15 Q You are familiar with Ms. Heard taking 16 prescriptions for acne and Provigil, among other 17 things, correct? 18 A Yes. 19 Q You were not -- you never served as a 20 nurse or doctor to Ms. Heard, right? 21 A No. 22 Q And you have no medical knowledge to</p>
<p style="text-align: right;">934</p> <p>1 A No. 2 Q Have you seen Mr. Depp since that 3 conversation? 4 A No. 5 Q Now, what's your -- just describe 6 generally your educational background, please. 7 A I completed high school, and then I 8 went straight into becoming a veterinary nurse 9 when I left the school, left school, which I did 10 for approximately three to four years before I 11 left Australia. 12 Q Did you have any sort of specialized 13 training in veterinary medicine or nursing? 14 A Only on-the-ground experience. I was 15 four years in a clinic. 16 Q So you don't have any experience with 17 medical training for humans, right? 18 A No. 19 Q And you don't have any training in 20 health care, correct? 21 A Could you be more specific? 22 Q You don't have any training in health</p>	<p style="text-align: right;">936</p> <p>1 testify whether Ms. Heard used Provigil or 2 Accutane in the way her doctors instructed, 3 correct? 4 A No. 5 Q And you're not an expert on the 6 interaction of prescription drugs and alcohol or 7 other drugs, correct? 8 A No. 9 Q Did you, during the course of your 10 employment, develop any personal knowledge of 11 Mr. Depp's use of alcohol or drugs? 12 A Not firsthand. 13 Q And what do you mean by "not 14 firsthand"? 15 A Well, I worked for Amber; I didn't work 16 for him. 17 Q Did you ever see Mr. Depp using illegal 18 drugs? 19 A No. 20 Q Did you ever see Mr. Depp abuse 21 alcohol? 22 A No.</p>

<p>1 Q Did you ever speak with Dr. Kipper? 2 A No. 3 Q Did you ever speak with Erin Boerum? 4 A Yes. 5 Q And Erin Boerum was a nurse who worked 6 for Dr. Kipper, right? 7 A She was assigned to Amber. 8 COURT REPORTER: I'm sorry? I'm sorry. 9 THE WITNESS: She was assigned to 10 Amber; that's how I came to be speaking to her. 11 Q And she also provided medical services 12 to Johnny, right? 13 A I don't remember. 14 Q What do you recall speaking to Erin 15 Boerum about? 16 A Just random chitchat in the course of 17 the day, nothing specific. 18 Q Do you recall ever forming any concern 19 in your own mind about any of Mr. Depp's behavior 20 in his relationship with Amber? 21 A Never. 22 Q Nothing you heard, nothing you</p>	<p>937</p>	<p>1 given some notice so I had some time to look 2 around, so I was a little upset for the lack of 3 notice, but apart from that, no, I was not upset. 4 Q Ms. Heard gave you six weeks of 5 severance pay, correct? 6 A I don't recall. 7 Q Did you want to stay in the job for 8 Ms. Heard? 9 A Well, I did ask if I could have a few 10 months' heads-up so I could seek another job that 11 would suit the terms of my employment, but she did 12 not allow that. 13 Q And that made you angry, correct? 14 A No. 15 Q Did you ask to be put on Mr. Depp's 16 payroll so that you could remain being paid by 17 Ms. Heard or Mr. Depp? 18 A Well, when she said she couldn't afford 19 it, I said, "Now you're married, couldn't I go 20 onto Depp's payroll?" 21 And she said no. It was part of a 22 legal agreement they had that she was not allowed</p>	<p>939</p>
<p>1 witnessed, nothing you saw during your time with 2 Ms. Heard ever gave you an inkling of concern 3 about Mr. Depp's behavior toward Amber? 4 A Never. 5 Q Now, you left your employment -- or 6 your employment with Amber ended in early 2015, 7 correct? 8 A Just after they came back from the 9 wedding on the island. 10 Q Did Ms. Heard terminate your 11 employment? 12 A When Ms. Heard came back from the 13 island, she informed me that she now needed to 14 support her mother because her mother could no 15 longer work after her diagnosis, her medical 16 diagnosis, and she told me she could no longer 17 afford to pay me since she had to support her 18 mother, and, therefore, she would have to 19 terminate my employment to support her family. 20 Q And did you resent Ms. Heard for that, 21 for terminating your employment? 22 A It would have been nice to have been</p>	<p>938</p>	<p>1 to do that. I don't know whether that was true or 2 not. 3 Q Did you ever ask Mr. Depp whether you 4 could go on his payroll? 5 A No. 6 Q Isn't it true that you asked to live in 7 one of Mr. Depp's houses rent-free for a period of 8 time after your employment? 9 A Well, you see, I'm a homeowner. I want 10 to be clear I didn't want to miss a mortgage 11 payment due to unemployment, so my idea was if 12 perhaps I can find an alternate accommodation in 13 order to rent out my house so I don't lose my 14 entire property. I'm a homeowner. Keeping my 15 home and my payments up to date is of paramount 16 importance to me. 17 Q Isn't it true that you had already 18 skipped about a year and a half of mortgage 19 payments on your home during the time you were 20 employed by Ms. Heard? 21 A No. 22 Q Let's pull out the document ending in</p>	<p>940</p>

<p>1 ALH -5858, please.</p> <p>2 TECHNICIAN: Exhibit 11 on the screen.</p> <p>3 Q Yeah, I think you read everything so if</p> <p>4 you're ready for me to ask the questions my first</p> <p>5 question is just is this an email exchange between</p> <p>6 you and Amber relating to the termination of your</p> <p>7 employment.</p> <p>8 A Yes, this is the email I received when</p> <p>9 she terminated me.</p> <p>10 Q And then the emails above in this</p> <p>11 document are -- some of which have duplicated --</p> <p>12 are an email change that you had with Amber after</p> <p>13 you received the termination email?</p> <p>14 A Yeah, when I woke up that morning, yep.</p> <p>15 Q Can you go to the first page, please,</p> <p>16 top of the document.</p> <p>17 A Uh-huh.</p> <p>18 Q Isn't it true that Ms. Heard did pay</p> <p>19 you six extra weeks of pay after your termination?</p> <p>20 A She's stating that but I don't recall</p> <p>21 if it actually happened or not.</p> <p>22 Q You don't have personal knowledge one</p>	<p>941</p> <p>1 was only four at the time so seemed like a good</p> <p>2 idea especially because I wasn't paying my</p> <p>3 mortgage so I could take the hit by getting less</p> <p>4 pay than I would normally make. And that way I</p> <p>5 could also have the time with my son that I</p> <p>6 wanted.</p> <p>7 Q And I think the answer to this is no,</p> <p>8 but I wanted to be clear. You're not blaming</p> <p>9 Amber for your not paying your mortgage, right?</p> <p>10 A No. That was my choice. It was the</p> <p>11 only way I could get a loan modification is the</p> <p>12 way it worked then. But, you know, the 2008 crash</p> <p>13 that's how it worked back then. If you wanted to</p> <p>14 save property.</p> <p>15 Q You started working for Amber in 2012,</p> <p>16 right?</p> <p>17 A Yes. It took a long time, the loan</p> <p>18 modification process.</p> <p>19 Q And you're not blaming Amber for</p> <p>20 getting a credit card with 29 percent interest,</p> <p>21 are you?</p> <p>22 A What?</p>
<p>942</p> <p>1 way or the other or recollection of whether she</p> <p>2 did?</p> <p>3 A No.</p> <p>4 Q And isn't it true that you do tell her</p> <p>5 in this email that you didn't pay your mortgage</p> <p>6 for the first year and a half that you were</p> <p>7 working for her?</p> <p>8 A Yes.</p> <p>9 Q Right?</p> <p>10 A I had one of those balloon mortgages,</p> <p>11 so I had to go to loan modification, and I recall</p> <p>12 now that's why I was able to agree to work for her</p> <p>13 for such a small amount of money from what I</p> <p>14 normally made; it was sort of as a favor, almost.</p> <p>15 Q What was the favor?</p> <p>16 A To work for her for, like, half my</p> <p>17 usual paycheck basically.</p> <p>18 Q So you were doing Amber a favor?</p> <p>19 A Yes. Because initially it was</p> <p>20 described as part-time, 20-hour-a-week thing with</p> <p>21 flexibility and blah, blah, blah. So, you know, I</p> <p>22 thought it's not really in my caliber, but my son</p>	<p>944</p> <p>1 Q You see in your email in that first</p> <p>2 page about two-thirds of the way down, you say, "I</p> <p>3 have borrowed from my mom my tenant's security</p> <p>4 deposit, and now I have used up a credit card I</p> <p>5 shouldn't have used as it has 29 percent</p> <p>6 interest"?</p> <p>7 A No. That's my choice.</p> <p>8 Q Did you have tenants in your property</p> <p>9 at that time?</p> <p>10 A I have a duplex. I'm just trying -- at</p> <p>11 that time, yes, I had tenants in one house and I</p> <p>12 was living in the other.</p> <p>13 Q Did you use the tenant's security</p> <p>14 deposit for personal expenses?</p> <p>15 A I don't remember.</p> <p>16 Q Do you see where you say, "I have</p> <p>17 borrowed from my mom my tenant's security</p> <p>18 deposit"?</p> <p>19 A Uh-huh.</p> <p>20 Q Do you recall using your tenant's</p> <p>21 security deposit or borrowing from that?</p> <p>22 A It's too long ago for me to recall if</p>

<p>1 it actually happened.</p> <p>2 Q Would there be a reason that you would</p> <p>3 have said that if it wasn't true?</p> <p>4 A No.</p> <p>5 Q And isn't it true that you did ask to</p> <p>6 live rent-free in one of the Johnny's houses after</p> <p>7 you were terminated, right?</p> <p>8 A Loads of people did.</p> <p>9 Q Isn't it true that you did?</p> <p>10 A Yes.</p> <p>11 Q And did that ever come to pass?</p> <p>12 A No.</p> <p>13 Q Did it make you angry that that didn't</p> <p>14 happen?</p> <p>15 A No.</p> <p>16 Q It's fair to say at the time that your</p> <p>17 employment was terminated, you were in fairly</p> <p>18 significant financial trouble, correct?</p> <p>19 A Yes.</p> <p>20 Q And you were angry with Amber for</p> <p>21 terminating you at this time when you were in</p> <p>22 financial trouble, correct?</p>	<p>945</p>	<p>1 but I wanted to go and say hi. I wasn't feeling</p> <p>2 like I wanted to avoid her or anything. You know,</p> <p>3 things happen and life goes on, you know.</p> <p>4 EXAMINATION BY COUNSEL FOR THE PLAINTIFF</p> <p>5 BYMS. VASQUEZ:</p> <p>6 Q I understand you're a personal</p> <p>7 assistant, Ms. James. What type of people do you</p> <p>8 work for?</p> <p>9 A High-profile celebrities.</p> <p>10 Q Are they celebrities in the</p> <p>11 entertainment industry?</p> <p>12 A Yes.</p> <p>13 Q You previously testified that in March</p> <p>14 of 2012, you worked as a personal assistant for</p> <p>15 Ms. Heard, yes?</p> <p>16 A Yes.</p> <p>17 Q In total how long did you work for</p> <p>18 Ms. Heard as her personal assistant?</p> <p>19 A Almost three years.</p> <p>20 Q And at the time you were hired in March</p> <p>21 of 2012, had you ever heard of Ms. Heard?</p> <p>22 A No.</p>	<p>947</p>
<p>1 A No.</p> <p>2 Q See at the bottom of your email on</p> <p>3 page 2, you say, "Max and I love you very much" as</p> <p>4 a sign-off to your email?</p> <p>5 A Yes.</p> <p>6 Q Max is your son, right?</p> <p>7 A Yes.</p> <p>8 Q That wasn't true, correct? In fact,</p> <p>9 you didn't love Amber, didn't like her, did you?</p> <p>10 A Any close relationship has ebbs and</p> <p>11 flows and feelings that you have for one another;</p> <p>12 it's pretty standard.</p> <p>13 Q And at that point in time you -- well,</p> <p>14 since your termination, you've had nothing but</p> <p>15 animosity towards Ms. Heard, correct?</p> <p>16 A No. Actually bumped into her at the PO</p> <p>17 box about three months after, and she was in her</p> <p>18 Range Rover. And I saw her sister, and she said,</p> <p>19 "Come say hi to Amber," and I went back there and</p> <p>20 I was going to say hi, but she was on the phone</p> <p>21 and she was saying, "Wait, wait." But then I had</p> <p>22 to go. That's the only time I've ever seen her,</p>	<p>946</p>	<p>1 Q You previously testified today that at</p> <p>2 some point while working for Ms. Heard, you</p> <p>3 transitioned from working part-time to full-time;</p> <p>4 is that right?</p> <p>5 A Yes, uh-huh.</p> <p>6 Q When did that transition happen?</p> <p>7 A I don't recall specifically.</p> <p>8 Q Do you think it happened within the</p> <p>9 first year of your employment?</p> <p>10 A I believe it happened within -- around</p> <p>11 six months into the employment.</p> <p>12 Q So most definitely it happened in the</p> <p>13 first year of your employment; is that correct?</p> <p>14 A Yes.</p> <p>15 Q You previously testified that you</p> <p>16 stopped working for Ms. Heard as her personal</p> <p>17 assistant in February of 2015 is that right?</p> <p>18 A Yes.</p> <p>19 Q And you also testified that Ms. Heard</p> <p>20 let you go upon her return from the Bahamas in</p> <p>21 February of 2015, yes?</p> <p>22 A Yes.</p>	<p>948</p>

<p style="text-align: right;">949</p> <p>1 Q Did Ms. Heard ever give you any 2 indication or warning that your employment might 3 end upon her marriage to Mr. Depp? 4 A No. 5 Q How did it make you feel when Ms. Heard 6 terminated your employment without warning? 7 A Bit of a shock. Bit of a feeling of 8 being blindsided. 9 Q When you first began working for 10 Ms. Heard, and when Ms. Heard was in town, in 11 other words, not traveling, how many times per 12 week would you see her? 13 A Almost daily. 14 Q And did that change when you became a 15 full-time personal assistant for Ms. Heard? 16 A No. 17 Q Would you see Ms. Heard on the weekends 18 as well? 19 A Yes. 20 Q And when you would see Ms. Heard in 21 person, did you coordinate with her when you would 22 be seeing her?</p>	<p style="text-align: right;">951</p> <p>1 press for her? 2 A Yes. 3 Q What specifically did she ask you to 4 do? 5 A I had a newsstand guy that was 6 instructed to hold two copies of every magazine 7 she appeared in. It was newsstand on Schoenborn 8 Avenue, just off LaCienega, and he would hold them 9 for me, and I would go there once a week to pick 10 up the magazines. 11 COURT REPORTER: I'm sorry. You got 12 muffled out. You said, "and he would hold those 13 for me and..." 14 THE WITNESS: Hold them for me, and I 15 would go approximately once a week to pick up 16 whatever magazines Amber was featured in, two 17 copies each, which I would then store in her 18 garage. 19 Q Why would you store them in Ms. Heard's 20 garage? 21 A Because she didn't want Mr. Depp to see 22 them.</p>
<p style="text-align: right;">950</p> <p>1 A No. I would arrive whenever it was 2 necessary to bring stuff that I picked up on 3 errands or whatnot. There was no given set 4 schedule. 5 Q And when you say you would arrive, 6 where would you arrive to? 7 A It depended where she was at the time. 8 Sometimes she was at Orange, sometimes she was at 9 one of Johnny's houses on Sweetzer, and then 10 eventually, they all moved down to the Lofts 11 downtown. 12 Q You previously testified that your work 13 as Ms. Heard's -- as being Ms. Heard's private 14 assistant was extensive. Would you please tell us 15 everything that was -- you were responsible for? 16 A Everything from handling all of her dry 17 cleaning, packages, mail, liaising with agents, 18 other people in the industry, coordinating travel, 19 making restaurant reservations, you know, dealing 20 with the staff, the vendors on the property, that 21 sort of thing. 22 Q Did Ms. Heard ever ask you to monitor</p>	<p style="text-align: right;">952</p> <p>1 Q Did she tell you why she didn't want 2 Mr. Depp to see them? 3 A No. She just got very angry with me 4 one day because I hadn't quite made it downtown to 5 put them in the garage when she came home, and she 6 went absolutely ballistic over that. 7 Q When you say "she went absolutely 8 ballistic over that," can you please describe what 9 you mean? 10 A Screaming, yelling, abuse. 11 Q Do you remember what she said to you? 12 A No. 13 Q But it was abusive, in your opinion? 14 A Blind rage. 15 Q Over the three-year period in which you 16 worked for Ms. Heard, were you ever with Ms. Heard 17 when she was getting dressed or undressing? 18 A All the time. 19 Q How often were you present when 20 Ms. Heard was getting dressed? 21 A Every time she was getting dressed for 22 a fitting, I would say 90 percent of the time, I</p>

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1 was there.

2 Q And just to clarify, was it just when

3 Ms. Heard was in fittings that you would see her

4 in states of undress?

5 A No. It was also in her apartment. She

6 had no issue with walking around naked quite

7 often.

8 Q Did you ever observe Ms. Heard putting

9 on makeup?

10 A Yes.

11 Q How often did you see Ms. Heard doing

12 her makeup?

13 A Just when she was getting ready to go

14 out somewhere for a party or something.

15 Q And when you interacted with Ms. Heard,

16 and I understand it was quite frequent and

17 regular, did it appear to you that she was wearing

18 makeup?

19 A She usually never wore makeup unless

20 she was going to a special event.

21 Q And when she did go to special events,

22 would you describe her makeup as heavy?

954

1 A Either a makeup artist would do it, or

2 she would do it herself. If she did it herself,

3 it would be light and usually adding lashes, and

4 that's about it.

5 Q And I believe you previously testified

6 to this, so I'm sorry for asking you again, but

7 while you worked for Ms. Heard, did you ever see

8 any type of injuries on her?

9 A No.

10 Q Did you ever see any cuts?

11 A No.

12 Q Did you see bruises?

13 A No.

14 Q Did you see swelling?

15 A No.

16 Q Redness in her face?

17 A No.

18 Q How about Ms. Heard having black eyes?

19 A Never.

20 Q A broken nose?

21 A Never.

22 Q Missing hair clumps? Sorry, I didn't

955

1 catch that.

2 A Never.

3 Q Did you ever see Ms. Heard cry?

4 A Yes.

5 Q How often did you see her cry?

6 A Hard to put a number on it. Sometimes

7 she would cry on the phone. I think at least once

8 or twice, she might have cried on the phone, you

9 know, and then as far as seeing her personally

10 crying, you know, she was a pretty dramatic

11 person. It's hard to really put a number on it.

12 Q And focusing on when you saw her in

13 person crying, how many times do you believe that

14 you saw her in person crying?

15 A I would say twice, maybe. Twice.

16 Q Let's take that in bite sizes.

17 The first time you saw Ms. Heard cry in

18 person, do you recall what she was crying about?

19 Go ahead, Ms. James.

20 A Insecure emotions.

21 Q So the two times that you recall

22 Ms. Heard crying in front of you, you remember her

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1 crying about being insecure; is that correct?

2 A Yes.

3 Q You testified that she felt insecure

4 about her relationship; is that correct?

5 A Yes.

6 Q Can you expand on that? What do you

7 mean by that?

8 A She didn't like being away from his

9 physical presence.

10 Q Did Ms. Heard tell you that she felt

11 insecure when Mr. Depp wouldn't be present with

12 her?

13 Other than telling you she felt

14 insecure about her relationship with Mr. Depp,

15 what else did Ms. Heard say about feeling

16 insecure?

17 A She told me she didn't like hanging out

18 in his house with his friends because it was

19 boring, and those were old men playing guitars and

20 it wasn't interesting to her.

21 Q Was Ms. Heard dating Mr. Depp when you

22 first started working for her?

957	1 A Yes. 2 Q When did you first learn that Ms. Heard 3 was dating Mr. Depp? 4 A After about a month, I think. 5 Q How did you learn that she was dating 6 Mr. Depp? 7 A She told me. 8 Q What did she tell you? 9 A She told me she is dating Johnny Depp. 10 Q Do you recall the first time you met 11 Mr. Depp? 12 A Yes. 13 Q When was that? 14 A It was in her apartment on Orange, 15 probably shortly after she told me she was dating 16 him and standing in the dining room. 17 Q And approximately when was that? 18 A I don't remember. I would say April or 19 May of 2020. 20 Q What was your impression of Mr. Depp? 21 A He was very peaceful, very calm, almost 22 shy, and very quiet. And I remember he was	959	1 Q How old was your son when you first 2 started working for Ms. Heard? 3 A Four. Four years old. 4 Q And did you ever bring your son to work 5 with you? 6 A Yes. 7 Q How often? 8 A Quite often if I had to keep working; I 9 would bring him back there after school. And if I 10 had to work on the weekend, he would come with me 11 then. 12 Q Did Mr. Depp ever interact with your 13 son? 14 A Yes. He was very kind. 15 Q How often did you -- did Mr. Depp 16 interact with your son? 17 A Whenever they were in each other's 18 presence. 19 Q Can you give me an estimate of how 20 often that happened? 21 A Oh, countless times. You know, he 22 would even teach him how to play guitar. He
958	1 wearing red suede shoes. Because I didn't know 2 where else to look, I looked at his shoes. It's a 3 weird recollection, I know, but I'm just being 4 honest. 5 Q Did you ever witness Mr. Depp be rude 6 to anyone? 7 A He's such a gentleman, so he's like a 8 total Southern gentleman. So, no, no. 9 Q Did you ever see Mr. Depp lose his 10 cool? 11 A No. 12 Q Did you ever see him scream at anyone? 13 A No. 14 Q Did you ever see him break something? 15 A Only in a video. 16 Q In your presence did you ever see 17 Mr. Depp break something intentionally? 18 A Never broke anything, never throw 19 anything, always completely passive. 20 Q I believe you've testified previously 21 that you have a son, correct? 22 A Yes.	960	1 brought him back things from vacations. He showed 2 him his amazing makeup makeover when he was doing 3 Black Mass. He tricked him and went over saying, 4 "Do you know who I am?" With a full makeup. My 5 son's jaw almost hit the ground. It was really 6 cute, actually. He gave my son a little pick as 7 well, guitar pick, which he cherishes to this day 8 as well. 9 Q Fair to say you were around Mr. Depp 10 and Ms. Heard together quite a lot? 11 A Yeah. It became increasingly more as 12 the time went on, yes. 13 Q What was your impression of Ms. Heard 14 and Mr. Depp's relationship? 15 A You know, it did not seem like a 16 perfect relationship to me, based on a lot of 17 insecurity on her behalf, which seemed to cause 18 confusion in the relationship. Maybe the age gap 19 was an issue because of interests. I know that 20 much. Apart from that, who am I to know their 21 relationship, you know? 22 Q Do you think that Mr. Depp was

961	1 smothering of Ms. Heard? 2 A Oh, no. 3 Q Did it appear to you that Mr. Depp was 4 jealous of Ms. Heard? 5 A No. 6 Q Did you ever have interactions with 7 Mr. Depp by yourself? 8 A Sometimes, yes. 9 Q And what were those interactions like? 10 A Just friendly chitchat, which would 11 stop immediately when Amber saw me speaking to 12 him. She'd give me the evil eye, and I'd always 13 just quickly walk away. 14 Q Did Amber ever talk to you about your 15 interactions with Mr. Depp? 16 A No. 17 Q In the three years that you worked for 18 Ms. Heard, did you ever see Ms. Heard and Mr. Depp 19 argue? 20 A No. 21 Q In the three years that you worked for 22 Ms. Heard, did you ever see any physical violence	963	1 be physically aggressive with anyone? 2 A No. 3 Q Let's break that down a bit. When you 4 say she was verbally abusive to you regularly, can 5 you explain to me how she was verbally abusive to 6 you? 7 A Screaming, screaming over the phone. 8 She screamed at me once in person, multiple times 9 screaming at me over the phone, barrages of 10 abusive text messages. In the middle of the 11 night, I think you're aware. I think between 2 12 and 4 a.m., the barrages would start; that's what 13 I'd wake up to. All incoherent, not really making 14 sense, just basically someone to lash out at, you 15 know, no apparent reason to it. 16 Q You testified previously that you 17 observed Ms. Heard being verbally abusive to her 18 sister? 19 A Yes. 20 Q What do you recall about that verbal 21 abuse? 22 A It was an ongoing "kick the door" kind
962	1 between Ms. Heard and Mr. Depp? 2 A Never. 3 Q Did you ever see either of them being 4 physically aggressive with one another? 5 A No. 6 Q Did you ever see any property damage at 7 Ms. Heard's home? 8 A Never. 9 Q Did you ever see any property damage at 10 Mr. Depp's primary residence on Sweetzer? 11 A Never. 12 Q Did you ever see any property damage at 13 the Lofts or the penthouses at the Eastern 14 Columbia Building? 15 A No, never. 16 Q Over the three-year period in which you 17 worked for Ms. Heard, did you ever hear from 18 anyone that Mr. Depp or Ms. Heard had been in a 19 physical altercation? 20 A No. 21 Q Over the three-year period in which you 22 worked for Ms. Heard, did you ever see Ms. Heard	964	1 of relationship with her sister, so it's really 2 hard to pinpoint any specifics, but, yeah, her 3 poor sister was treated like the dog that you kick 4 basically. 5 Q You've previously testified that 6 Ms. Heard -- you observed Ms. Heard be verbally 7 abusive to her mother. 8 A Uh-huh. 9 Q What specifically did you observe? 10 A Well, there is a video line where you 11 can see her being abusive, first and foremost, so 12 it's not even based on what I'm telling you. It's 13 what I've seen the interactions between the two of 14 them when her mother was still alive and the fact 15 that her mother was terrified of her. 16 Q Did her mother tell her she was 17 terrified of her? 18 A She personally told me she was 19 terrified of her. 20 Q Did you ever witness Ms. Heard tongue 21 lash her mother? 22 A Here and there, yes. Especially when

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1 it was built up to a stressful event or something
2 like that, yeah.
3 Q You said you felt that Ms. Heard was
4 verbally abusive to you. Can you provide me with
5 any specific examples of this behavior?
6 A I thought I did earlier that, yeah, so
7 random and ongoing, you would never know when it
8 was going to come left of center. I do remember
9 on one occasion when we were going from part-time
10 to full-time, and the salary negotiations became a
11 real bone of contention. And I specifically
12 remember standing in her office where she leapt up
13 out of her chair, put her face approximately four
14 inches from my face. So she was spitting in my
15 face and telling me how dare I ask for the salary
16 I was asking for, which was, in fact,
17 approximately half of my regular annual salary. I
18 was offering her that as a favor. And she felt --
19 she felt that gave her the right to spit in my
20 face, and there was a witness in the apartment at
21 that time by the way.
22 Q Who was at the apartment at the time?

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1 A The handyman, Hector Galindo.
2 COURT REPORTER: I'm sorry.
3 THE WITNESS: The handyman, Hector
4 Galindo.
5 A He was so mortified. He was so
6 embarrassed to hear her speaking to me like that.
7 Q Ms. James, while you worked for
8 Ms. Heard, did you ever observe her drinking
9 alcohol?
10 A Yes, I did.
11 Q How often did you observe Ms. Heard
12 drink alcohol?
13 A Don't recall.
14 Q What alcohol did you observe Ms. Heard
15 drink in your presence?
16 A Red wine.
17 Q Did Ms. Heard ever appear intoxicated
18 to you?
19 A Yes. She often did.
20 Q While you worked for Ms. Heard, were
21 you aware of what, if any, prescription drugs she
22 was taking?

967

1 A Yes. Because I had to pick it up, and
2 I often had to deliver it to her.
3 Q You anticipated -- I'm sorry,
4 Ms. James. I interrupted your question -- or your
5 answer, excuse me. The last part of your answer
6 was to?
7 A I would -- that was my job, to pick it
8 up and deliver it to her, also bring it to her if
9 she was doing a photo shoot or, you know, on set
10 or something, if she had forgotten it.
11 Q What prescription drugs do you remember
12 picking up for Ms. Heard?
13 A Provigil.
14 Q Any other prescription drugs that you
15 remember picking up for Ms. Heard?
16 A Accutane.
17 Q Any others?
18 A Not specifically.
19 Q To your knowledge, did Ms. Heard ever
20 stop taking Provigil or Accutane while you were
21 working for her?
22 A No.

968

1 Q Did Ms. Heard ever tell you that she
2 was experiencing any side effects from Provigil?
3 A She didn't say it, but I observed it.
4 Q We'll go back to that in a minute.
5 But did Ms. Heard ever tell you that
6 she was experiencing any side effects from
7 Accutane?
8 A No.
9 Q You previously testified that you
10 observed Ms. Heard having certain side effects
11 from Provigil, yes?
12 A Yes.
13 Q What side effects did you observe
14 Ms. Heard exhibiting?
15 A Manic episodes.
16 Q Can you tell me what you mean by "manic
17 episodes"?
18 A Similar to if someone was on some sort
19 of amphetamine drug, moving very fast, not making
20 a lot of sense, hyperorganizing, hypertasking,
21 just very, very hyper.
22 Q Besides prescribed medication, did you

<p>1 ever observe Ms. Heard ingest any illicit drugs 2 while you worked for her? 3 A No. 4 Q Did Ms. Heard ever tell you that she 5 had ingested illegal drugs? 6 A Yes. 7 Q When did Ms. Heard tell you that she 8 had ingested illegal drugs? 9 A Sporadically here and there. 10 Q What drugs did Ms. Heard tell you she 11 had ingested? 12 A Mushrooms, ecstasy, and cocaine. 13 Q If you remember, how many times did 14 Ms. Heard tell you that she had ingested illegal 15 drugs? 16 A I can't remember. 17 Q Based on your personal observations, 18 did it ever appear to you that Ms. Heard was under 19 the influence of illegal drugs? 20 A Yes. 21 Q How many times? 22 A I don't know.</p>	<p>969</p>	<p>1 the United Kingdom? 2 A Well, I wrote a witness statement, and 3 then I had to do a live video feed. 4 Q And did you understand that your 5 witness statement was made under oath? 6 A Yes. 7 Q And did you understand that your 8 testimony during the trial, live, was also under 9 oath? 10 A Yes. 11 Q Did anyone help you write your witness 12 statement? 13 A Schillings, over in the U.K., helped me 14 with the first draft, and then I took over and 15 completely edited it to be my own words. That was 16 after a phone conversation we had; I jotted down 17 notes, sent me some basic notes to work with and 18 then I worked on it from there. 19 Q How long did it take you to write your 20 witness statement? 21 A About three or four days. 22 Q Did you feel you had an adequate amount</p>	<p>971</p>
<p>1 Q Less than five? 2 A So long ago, it's hard for me to 3 remember. 4 Q Why did you -- why did it appear to you 5 that Ms. Heard was under the influence of illegal 6 drugs? 7 A Disoriented, partying with friends, 8 lots of heavy drinking, laughing, dancing, 9 playing, all the sorts of things that go 10 hand-in-hand with the imbibing in drugs. 11 Q Would Ms. Heard's treatment of you 12 change when she was intoxicated? 13 A Yes. 14 Q How so? 15 A She became more and more belligerent 16 and abusive. 17 Q Ms. James, you previously testified 18 that you provided testimony in a matter involving 19 Mr. Depp in the United Kingdom. Do you remember 20 that testimony? 21 A Uh-huh, yep. 22 Q And how did you provide testimony in</p>	<p>970</p>	<p>1 of time to prepare and write your witness 2 statement? 3 A Yes. I was very proud with the 4 outcome, how I wrote it, because it was all my 5 words and it was the absolute truth. 6 Q And did you have enough time to review 7 your witness statement for accuracy before you 8 signed it? 9 A Yes. 10 Q Was everything that was in your witness 11 statement true and accurate to the best of your 12 knowledge? 13 A Yes. 14 Q And is that still true today? 15 A Yes. 16 MS. VASQUEZ: Lucien, may I please have 17 you pull up Depp Exhibit 4, please. 18 TECHNICIAN: Depp Exhibit 4 on the 19 screen. 20 MS. VASQUEZ: Thank you. 21 Q Ms. James, do you remember receiving an 22 email from Ms. Heard on or about February 12th,</p>	<p>972</p>

<p>1 2015? 2 A I don't even believe I was still 3 working that date. 4 Q Do you remember receiving this email in 5 particular from February 12th, 2015? 6 A Again, I don't -- as far as I know, I 7 wasn't even working for her at that time, so I 8 wouldn't even know why she wrote this letter to 9 me, quite honestly. 10 Q Do you remember receiving this email 11 then? 12 A No. 13 Q Okay. 14 MS. VASQUEZ: Can we please pull up 15 Exhibit Number 5. 16 TECHNICIAN: Stand by. 17 Depp Exhibit Number 5 on the screen. 18 MS. VASQUEZ: Lucien, may I ask you 19 to -- there you go. You read my mind. 20 Lucien, may I either take control or 21 have you scroll down to the bottom. Thank you. 22 Q Ms. James, the way these emails tend to</p>	<p>973</p>	<p>1 A Not really, no. No. 2 Q Do you see where Ms. Heard on 3 February 4th, 2015, writes in all caps "Are there 4 no direct flights??" 5 A Uh-huh. 6 MS. VASQUEZ: I'm just pointing her to 7 the top email, Mr. Rottenborn. 8 Q Do you see where Ms. Heard writes to 9 you "Are there no direct flights?" in all caps? 10 A Yep. 11 Q You would agree with me that nowhere 12 else in this email chain Ms. Heard uses all caps 13 to write to you, correct? 14 A No, there's not. She seems very 15 confused; that's all I can say. When I'm reading 16 through this, that's all I can say; she just seems 17 very confused. Everything is its own, like if 18 that question were to be directed to anyone, it 19 should have been to the travel agent, not me. I 20 mean, I'm not the travel agent. The travel agent 21 was down there in the beginning, Trudy Salven. 22 Q Direct your attention, Ms. James, to</p>	<p>975</p>
<p>1 work is they start at the bottom -- 2 A Yep. 3 Q -- and then go up, and this one is no 4 exception. So I'm going to, for your ease, I'm 5 going to have you read the bottom email first, 6 since it's the first one in the chain, dated 7 February 3rd, 2015. 8 A Uh-huh. Looks like she was traveling 9 straight to London after the wedding. That's what 10 I'm reading. 11 Q Actually, you know what? Why don't you 12 read this entire email chain, and then I'm going 13 to ask you some questions about it. 14 A Uh-huh. Can you help me? It says -- I 15 don't know. It's being finicky. 16 TECHNICIAN: Do you have control of it? 17 MS. VASQUEZ: I do have control. 18 Q Sorry, Ms. James. 19 A Thank you. I can go up a bit more now. 20 Uh-huh. 21 Q Do you remember receiving these emails 22 from Ms. Heard?</p>	<p>974</p>	<p>1 May of 2014 when you met Ms. Heard at the Chateau 2 Marmont in Los Angeles California. 3 Do you remember your testimony about 4 that incident? You testified previously that 5 she -- that Ms. Heard asked you to bring a bathing 6 suit to the hotel; is that correct? 7 A Yes. 8 Q Did you see Ms. Heard wearing a bathing 9 suit in May of 2014 at the Chateau Marmont? 10 A Yes. 11 Q Based on your recollection, did you see 12 any bruises on Ms. Heard's body? 13 A No. 14 Q Did you see any red marks on 15 Ms. Heard's body? 16 A No. 17 Q How would you describe the general 18 atmosphere or mood of Ms. Heard and her friends at 19 the Chateau Marmont? 20 A To be honest, it seemed a little 21 conspiratorial to me. 22 Q How so?</p>	<p>976</p>

<p style="text-align: right;">977</p> <p>1 A Like a strategy meeting or something 2 and combined with a pool party. Hard to describe. 3 It was very confusing. Originally I thought I was 4 going over for some major emergency, but then 5 something else completely different was going on 6 that day. 7 Q What made you think something 8 completely different was going on that day? 9 A Well, because originally it made it 10 seem like she was having this major emergency, and 11 she was completely alone and she needed me very 12 badly to come as quickly as possible. But when I 13 got there she was surrounded by people, Savannah, 14 iO Tillett Wright, and Rocky specifically, Raquel 15 Pennington. 16 COURT REPORTER: What was the second 17 name you said? I got Rocky and who? 18 A IO Tillett Wright, it's the letter I, 19 the letter O, Tillett Wright. 20 Q Did you observe Ms. Heard showing what 21 appeared to be injuries to any of her friends at 22 the Chateau that day?</p>	<p style="text-align: right;">979</p> <p>1 insecurity on Amber's part affected their 2 relationship, but you did not develop an opinion 3 that substance abuse or any actions by Johnny 4 affected their relationship; is that right? 5 A That statement was based on 6 communications directed to me from Amber, 7 basically. 8 Q What communications specifically? 9 A Expressing, you know, exactly what I 10 just stated. That she was sad. She didn't want 11 to be away from him, blah, blah, blah. That sort 12 of thing. It would happen all the time. 13 Q And you believed that those statements 14 were the reason that their relationship wasn't 15 perfect? 16 A It's not for me to speculate. 17 Q You would agree that just because 18 someone is insecure in a relationship, does not 19 mean that she deserves to be abused, correct? 20 A I have no answer for you to that. 21 Q You would agree that even if someone 22 acts "smothering" in a relationship, doesn't mean</p>
<p style="text-align: right;">978</p> <p>1 A No. 2 Q Did it appear to you that Ms. Heard's 3 friends were comforting her? How would you 4 describe Ms. Heard's friends' behavior? 5 A Friends hanging out together by the 6 pool, having cocktails, and spending the entire 7 afternoon hanging around together. 8 EXAMINATION BY COUNSEL FOR THE DEFENDANT 9 BY MR. ROTTENBORN: 10 Q Did you ever learn information that 11 made you believe that one of the reasons that the 12 relationship between Johnny and Amber wasn't, as 13 you described, perfect was because of Johnny's 14 substance abuse? 15 A I couldn't speculate on the details of 16 their personal relationship. 17 Q You did testify earlier that one of the 18 reasons you thought their relationship wasn't 19 perfect was insecurity on Amber's part, though, 20 right? 21 A Yes. 22 Q So you developed an opinion that</p>	<p style="text-align: right;">980</p> <p>1 she deserves to be abused, correct? 2 A I don't have an answer for you for 3 that. 4 MR. ROTTENBORN: I don't have any 5 further questions. Thank you for your time today. 6 THE COURT: All right. Thank you. 7 All right, ladies and gentlemen, let's 8 go ahead and take our morning recess for 15 9 minutes. No outside research. Do not talk about 10 the case. 11 Okay. Thank you. 12 (Whereupon, the jury exited the 13 courtroom and the following proceedings took 14 place.) 15 THE COURT: All right. Let's go ahead 16 and take a break until noon. Is your next 17 witness -- 18 MR. CHEW: Yes, Your Honor, I was going 19 to say -- 20 THE COURT: We're going to set it up so 21 it's all ready to go. 22 MR. CHEW: Okay. Thank you, Your</p>

981	983
1 Honor.	1 couple's problems, and then it's a
2 THE COURT: Really appreciate that.	2 conceptualization of what's actually going on in
3 Okay. Be in recess until 12.	3 an effort to make interventions that lead to
4 (Recess taken from 11:38 a.m. to	4 change.
5 12:00 p.m.)	5 Q So you recognize what this document is?
6 THE BAILIFF: All rise.	6 A Yes.
7 THE COURT: All right. Are we ready	7 Q What is it?
8 for the jury?	8 A This is my ledger for tracking sessions
9 MR. CHEW: Yes, Your Honor.	9 that I use for invoice – billing.
10 THE COURT: Everything's working,	10 Q And did this ledger come out of your
11 right?	11 files?
12 MR. CHEW: Yes.	12 A Yes.
13 THE COURT: All right, good. Thank	13 Q And do you keep this document in the
14 you. Thank you.	14 ordinary course of business?
15 (Whereupon, the jury entered the	15 A Absolutely.
16 courtroom and the following proceedings took	16 Q Okay. And I just want to -- and this
17 place.)	17 particular ledger, who is it for?
18 THE COURT: All right. Thank you.	18 A It's -- well, despite the names that
19 Your next witness.	19 are camouflaged, it's for Ms. Heard and Mr. Depp.
20 MR. CHEW: Your Honor. Depp calls	20 Q At the top, what are the two names that
21 Dr. Laurel Anderson by video.	21 it says there?
22 EXAMINATION BY COUNSEL FOR THE PLAINTIFF	22 A Ann Henry and Joey Davis.
982	984
1 BY MR. NADELHAFT:	1 Q And Ann Henry is Amber Heard?
2 A Laurel Avis Anderson.	2 A Yes.
3 Q And what is your business address?	3 Q And Joey Davis is Johnny Depp?
4 A It's been a while. 10921 Wilshire	4 A Yes.
5 Boulevard, Westwood Medical Plaza, Suite 1101,	5 Q And then it says age 29 and 52; is that
6 Los Angeles 90024.	6 right?
7 Q And you're a clinical psychologist; is	7 A Yes.
8 that correct?	8 Q And 29 was the age of Amber Heard at
9 A Correct.	9 the time?
10 Q And you practice in Los Angeles?	10 A Yes.
11 A Yes.	11 Q And 52 was the age of Johnny Depp?
12 Q For how long have you been practicing?	12 A Yes.
13 A Almost 40 years.	13 Q So as I understand it, on October 1st,
14 Q Have you been practicing in Los Angeles	14 2015, Mr. Depp and Amber Heard came in for couples
15 for that entire time?	15 counseling at -- for 3 1/2 hours?
16 A Yes.	16 A Yes. Whether they were in for the full
17 Q And you provide counseling for couples?	17 3 1/2 or not, I don't know. But that was the
18 A Psychotherapy for individuals and	18 amount -- that was when the session started, and
19 couples.	19 they came in when they came in, not together, and
20 Q And what is psychotherapy, just a brief	20 it took 3 1/2 hours to actually do that first
21 layman's description?	21 session.
22 A It's an evaluation of an individual or	22 Q So as I understand it, for that first

985	1 session, Mr. Depp and Amber Heard did not come in 2 together? 3 A I don't believe that they did. The 4 next session with Amber – with Ms. Heard alone, 5 for background intake, and that was a 2 1/3-hour 6 session. 7 Q And that session was on October 6th, 8 2015? 9 A Yes. 10 Q And what's the next row indicate? 11 A The next day – 12 Q You saw Amber October 6th, 2015 for 13 2 1/3 hours, correct? 14 A Yes. 15 Q And what is the next row indicating? 16 A The next day, October 7th, Mr. Depp, 17 for 3 1/2. Again, it may not have been 18 face-to-face for the full 3 1/2, but it was being 19 at the beginning of the session waiting for him, 20 his coming in with the entourage, and our getting 21 to work. 22 Q And for the three sessions we just	987	1 the fourth column? 2 A Walk – for me, that's "walk out." 3 Q And do you recall who walked out of 4 that meeting? 5 A I have tried to, and I don't. Because 6 each threatened and stood up, and I'm not positive 7 who finally did the walkout. 8 Q And then what does it say -- what is it 9 indicating on the row for 11/12/2015? 10 A Couples session showed, one and a half 11 hours. 12 Q And then on 12/17, what does that show? 13 A Amber alone show two and a quarter 14 hours. 15 Q Based on this, you saw Amber and 16 Mr. Depp for four couples sessions? 17 A That's right. 18 Q Dr. Anderson, I'm showing you what's 19 been marked as Anderson 3. 20 MR. NADELHAFT: And, your Honor, at 21 this time, we're looking to move Defendant's 22 Exhibit 397. I understand there's no objections.
986	1 discussed, the October 1st session, the 2 October 6th session, and the October 7th session, 3 those were all in person with you, correct? 4 A So, yes. The first three sessions were 5 all in person. 6 Q And then what does it say under -- for 7 the next row, for the 10/14 row? 8 A Couple, three hours. 9 Q So October 14th, 2015, Amber Heard and 10 Mr. Depp saw you for couples session? 11 A Yes. 12 Q There's a couple session on 13 October 14th for three hours; is that right? 14 A 10/14, there's a couple session. On 15 10/21 there's a couple session where someone 16 walked out, for two hours. On 10/24, Ms. Heard 17 was there. We did a phone session for one and a 18 half. 19 Q And how did -- and on the 10/24 row, 20 next to the two hours, it says "W out," correct? 21 A It's 10/21. 22 Q In the 10/21 row, what does it say in	988	1 THE COURT: All right. 397, no 2 objection; is that correct? 3 MR. CHEW: We do have hearsay and 4 relevance objections, Your Honor. 5 MR. NADELHAFT: They didn't list 6 objections in their exhibit list, and then we 7 actually communicated this morning and they said 8 they weren't objecting. 9 THE COURT: Do you know who on the team 10 you talked with? I'm sorry. 11 MR. NADELHAFT: Do you want me to... 12 THE COURT: No, that's all right, who? 13 MR. NADELHAFT: I believe it was 14 Jessica Meyers. 15 THE COURT: All right. So no 16 objections. All right. 17 MS. MEYERS: Sorry, Your Honor. 18 THE COURT: 397 in evidence, then, 19 Defense 397. 20 Q And I will let you -- which is 21 CC000172, I'll let you take a look at it. It's a 22 one-page email. Just let me know when you're

989	1 finished. 2 Do you recognize this email chain? 3 A Yes. 4 Q Do you know who Christian Carino is? 5 A Yes. 6 Q On the page where it says 7 laurel.anderson28@gmail.com, that's your email 8 address? 9 A Yes. 10 Q The email March 28th, 2015, from 11 Mr. Carino, he wrote, "Laurel...my closest friend 12 Amber (on copy) wants to come see you...alone 13 first and then with her husband Johnny. Will 14 leave it to you two to arrange a time. Love you 15 both." 16 Do you see that email? Did you receive 17 that email from March 18th, 2015? 18 A I did. 19 Q Okay. And you responded to 20 Mr. Carino's email, correct? 21 A As you can see, yes. 22 Q What was your understanding as to why	991	1 so much for responding. I really appreciate it. 2 "I have to speak to my husband when 3 he's done working today and make sure he's good 4 with that time. I think it sounds perfect. Thank 5 you so much again. I'm really looking forward to 6 meeting you." 7 Did I read that correctly? 8 A Yes. 9 Q And you received that email from Amber 10 Heard? 11 A I did. 12 Q On September 27th, 2015, you received 13 an email from Amber Heard, correct? 14 A Yes. 15 Q And Amber wrote, "Hi Laurel. Johnny 16 and I are back in town and would love to know if 17 you have any availability to see us this week. 18 Please let me know. Thanks." 19 You received that email from Amber 20 Heard? 21 A Yes. 22 Q And you responded that you were
990	1 Amber Heard wanted to meet with you? 2 A I took it at face value that Ms. Heard 3 wanted to have a consultation, and if – this is 4 not infrequent, that I might get an email like 5 this – so and when I hear that someone may then 6 later want to come in with husband or spouse, yes, 7 I think it has to do with relationship issues. 8 Q On September 9th, 2015, you received an 9 email from Mr. Carino; is that right? 10 A Yes, apparently. He was trying to set 11 it up. 12 Q And Mr. Carino was trying to set up a 13 meeting with you and Amber and Mr. Depp; is that 14 right? 15 A Yes. That's what I assumed. 16 Q And you responded to Mr. Carino's 17 email, correct? 18 A I did. 19 Q And then at the top, you received an 20 email from Amber Heard? 21 A Yes. 22 Q And she wrote, "Hi Laurel. Thank you	992	1 available on Thursday at 5:30 p.m., correct? 2 A Yes. 3 Q And looking at the top of the email 4 where it says Wednesday, September 30th, would you 5 agree that the next day is Thursday, October 1st, 6 2015? 7 A Yes. 8 Q Okay. And if we need to, we can go 9 back to your billing ledger, but the first time 10 you saw Amber Heard and Mr. Depp was on 11 October 1st, 2015; is that right? 12 A Yes. 13 Q Did you see Amber Heard on 14 December 17th, 2015? 15 A Yes. We had established that. Yes. 16 Q Dr. Anderson, I'm showing you what's 17 been marked as Anderson Exhibit 7, which is 18 Depp -3202. Take a chance to read it, and let me 19 know when you're finished. 20 A Yes. 21 Q Attachment 7 is an -- at the bottom it 22 is a -- you see a March 8th, 2015 email from

<p style="text-align: right;">993</p> <p>1 Christian Carino to you, correct? 2 A Yes. 3 Q And Christian Carino was asking if 4 you'd be willing to make a house call to Johnny 5 Depp's apartment downtown; is that right? 6 A I did not know where he lived. 7 Q But in his email it says "Would you be 8 willing to make a house call to Johnny's apartment 9 downtown," correct? 10 A Did it say "downtown"? Yes, it did. 11 Okay. 12 Q And then, you responded on March 8th, 13 2016, correct? 14 A Yes. 15 Q And you wrote "Hey Christian, Have, of 16 course, avoided this my whole career, unless 17 someone was in rehab. Would be willing to try it 18 once in that there's something I'd like Johnny to 19 understand that I don't think he does." 20 Where you wrote: "I'd like Johnny to 21 understand," were -- where you wrote "Would be 22 willing to try it once in that there's something</p>	<p style="text-align: right;">995</p> <p>1 Amber ever report to you any physical violence on 2 behalf of Mr. Depp toward Amber? 3 A Yes. 4 Q What type of physical violence did she 5 report to you? Do you recall seeing photos from 6 Amber Heard? 7 A I have, but I don't remember when I saw 8 them. 9 Q What do you recall about the photos? 10 A Her face was bruised. 11 Q Do you recall where on her face you 12 saw -- on Amber's face you saw bruises? 13 A I think they were around her eyes, but 14 I couldn't be positive. 15 Q Did you witness abuse by either? 16 A I didn't witness. 17 Q Had you worked with Mr. Depp before 18 working with Amber and Mr. Depp? 19 A No. 20 Q Is it your testimony that while 21 Mr. Depp may have said he wasn't violent with any 22 of his other partners, there was violence</p>
<p style="text-align: right;">994</p> <p>1 I'd like Johnny to understand that I don't think 2 he does," what did you mean by that? 3 A I can't say exactly what it was I 4 wanted to impart, but I know that I thought that 5 he was having difficulty in the sessions, and I 6 think there was something about the process 7 between the two of them that I was trying to clue 8 him into. 9 Q What difficulty was Mr. Depp having in 10 the sessions? 11 A Having a voice. 12 Q What do you mean by that? 13 A Ms. Heard had a jackhammer style of 14 talking. She was very amped up. He had trouble 15 talking at a similar pace. Their dialogue, he was 16 cut off a lot. So I'm guessing this is what I 17 was -- I'm not sure what it is, but it was 18 something -- anyhow, this is how he didn't have a 19 voice. He couldn't keep up with her rapid-fire 20 way of conversation. And so he was really 21 overwhelmed. 22 Q In working with Amber and Mr. Depp, did</p>	<p style="text-align: right;">996</p> <p>1 between -- from Mr. Depp toward Amber, correct? 2 A Yes. You're right. He had been well 3 controlled, I think, for almost, I don't know, 20, 4 30 years. And both were victims of abuse in their 5 homes. But I thought he had been well controlled 6 for decades. And then with Ms. Heard, he was 7 triggered, and they engaged in what I saw as 8 mutual abuse. Sometimes -- I'm not -- I know she 9 led, on maybe one occasion, and started it to keep 10 him with her because abandonment and having him 11 leave was her worst nightmare. And I think he may 12 have initiated it on occasions too, and that I'm 13 less sure of. 14 Q And how did you come to the 15 understanding that on some occasions, Ms. Heard 16 physically abused Mr. Depp? 17 A Ms. Heard reported that. 18 Q What did Ms. Heard report to you? 19 A That it was a point of pride -- two 20 things. It was a point of pride to her, if she 21 felt disrespected, to initiate a fight. Her 22 father had beaten her. She was not going to --</p>

<p>1 And the second one is what she reported 2 to me, which is if he was going to leave her to 3 deescalate from the fight, she would strike him to 4 keep him there. She would rather be in a fight 5 than have him leave. 6 Q Did you speak to any other doctors or 7 psychologists that worked with either Amber or 8 Mr. Depp? 9 A No. 10 Q Did you review any medical documents of 11 Mr. Depp or Amber? 12 A I reviewed a pharmacokinetic that 13 Ms. Heard showed me which has to do with 14 neurotransmitter function, genetics, and 15 medications. 16 EXAMINATION BY COUNSEL FOR THE PLAINTIFF 17 BY MR. CHEW: 18 Q Just to go back, Doctor, what 19 professional degrees do you hold? 20 A I have a couple of master's, a Ph.D., 21 and a certified clinical nutrition certification. 22 MR. CHEW: Would you mind, please, just</p>	<p>997</p>	<p>1 was, you know, I have it out of order. Then I was 2 on my own, but I was employed by – this is when I 3 was employed by a psychiatric medical group to do 4 kind of a combination of psychotherapy and some 5 nutrition. And then, since then, I have been a 6 solo practitioner, out of network, word of mouth 7 only, very small footprint, purposely, all of 8 these years. 9 Q When did you become a solo 10 practitioner? 11 A Very soon. Probably in – probably 12 in – probably in '86. 13 Q So is it fair to say that as of 2015, 14 you were already quite established as a solo 15 practitioner? 16 A Yes. 17 Q Generally speaking, what type of 18 services did you provide your patients in 2015? 19 A Adult-only, individual or couples work, 20 and with a limited number of people, there would 21 have been neurotransmitter testing and some 22 attention to lifestyle and how nutritional</p>	<p>999</p>
<p>1 elaborating on that for the record? 2 A Yes. I have a master's from Young in 3 my early life in teaching curriculum. I have a 4 master's in psych. I have a Ph.D. in clinical 5 psychology. I have a CCN, which is a certified 6 clinical nutrition certification. 7 Q And do you recall, Doctor, in what year 8 you obtained your Ph.D.? 9 A Yes. I got it in '82. 10 Q And very briefly, if you could just 11 please, in summary fashion, just describe your 12 employment history from 1982 forward after earning 13 your Ph.D. 14 A I collected clinical hours in hospitals 15 and in psychiatric medical groups. I was employed 16 to do some nutrition evaluation and intervention 17 as well, but there were MDs behind me. We worked 18 in concert. 19 Then worked in a hospital which I 20 think -- 21 Q Bless you. 22 A -- was workers' comp. And then when I</p>	<p>998</p>	<p>1 elements affect the brain. 2 Q And if you would, just please describe 3 for us laypeople what a clinical psychologist 4 does. 5 A The first thing is evaluation, intake, 6 gather material. 7 The second thing in the way I work is 8 during the intake process, could be one session, 9 could be four sessions, depends on if it's an 10 individual or a couple, I'm conceptualizing. I'm 11 looking for the process. The content is something 12 I make notes on, I care about, it leads me from 13 session to session. But I'm really looking at 14 process, what's going on between two people or 15 what's actually going on inside of someone. 16 The third step is I'm -- I show my 17 hand. I talk about it. I try to get either three 18 people in the room all on the same page with me, 19 or one other person. This is what I see. And 20 then the onus is on me to not just be a good 21 friend and hold someone's hand and talk about Mom, 22 but to actually make change. And so I lay out</p>	<p>1000</p>

<p style="text-align: right;">1001</p> <p>1 "Here are the things I think we need to work on." 2 And then there are action steps for all of them so 3 that someone has a more directed sense of what 4 they're doing in psychotherapy, as opposed to just 5 coming in and talking about how they feel. 6 Q Is it your practice, when you have a 7 session with a couple, that you take notes from 8 the session? 9 A I absolutely take notes from any 10 session. 11 Q Do you take -- at what time in relation 12 to the session do you take the notes? 13 A I'm taking them during the session, and 14 they know it. Because I don't want hours and 15 hours and hours of homework at the end of a 16 clinical day. So the notes are often, you know, a 17 lot of typos, wrong pronouns here and there. But 18 essentially I'm just trying to gather facts as I 19 go. 20 Q Is it fair to say that you take the 21 notes in a somewhat contemporaneous fashion? 22 A Sure.</p>	<p style="text-align: right;">1003</p> <p>1 A It's Christian Carino during the first 2 contact, and the second one is from Ms. Heard 3 wanting to know how to get in touch with me. 4 Q But accepting what's been thrust upon 5 us, when was your first couples therapy involving 6 Ms. Heard? 7 A October 1st, 2015. 8 Q Was that an in-person session? 9 A Yes. 10 Q Where was the session held? 11 A In my office. 12 Q And Mr. Depp was also there, correct? 13 A Yes. 14 Q How long was that first session? 15 A Three and a half hours. 16 Q Was that the first time that you had 17 ever met Ms. Heard in person? 18 A I think so. 19 Q And was that the first time you had 20 ever met Mr. Depp in person? 21 A Yes. 22 Q Okay. Now, if you could please turn --</p>
<p style="text-align: right;">1002</p> <p>1 Q Do you take those notes in the ordinary 2 course of your practice in your business? 3 A Absolutely. 4 Q Do you maintain or do you keep those 5 notes as part of your treatment and regular 6 course -- ordinary course of business? 7 A I do. 8 Q Thank you. 9 And what type of information, 10 generally, do you keep in your notes, other than 11 what you've already testified about? 12 A Whatever I want to. Anything that -- 13 it could be content that I'm tracking, just so I 14 know in the next session what kind of content we 15 were talking about, and it could be process, too. 16 TECHNICIAN: Stand by and I'll mark 17 notices as Plaintiff's Exhibit Number 1. Showing 18 you 1 on screen. 19 Q Just to confirm, have you seen this 20 document before, Dr. Anderson? 21 A Yes. 22 Q And what is it?</p>	<p style="text-align: right;">1004</p> <p>1 and this is a multipage exhibit, Mr. Nadelhaft did 2 not show you. This is going to be Plaintiff's 3 Exhibit 2. 4 TECHNICIAN: Stand by. 5 FEMALE SPEAKER: Can I interrupt a 6 minute, Ben? 7 MR. CHEW: Sure. 8 FEMALE SPEAKER: Adam, can you turn up 9 your microphone because everyone's a lot louder 10 than you, and when you object, I struggle to hear 11 you. 12 MR. NADELHAFT: Can you hear me? 13 FEMALE SPEAKER: Michelle is a lot 14 louder than you, so if you talk at the same time, 15 I can't hear you. 16 MR. NADELHAFT: All right. I'll see 17 what I can do. 18 FEMALE SPEAKER: Thank you. 19 BY MR. CHEW: 20 Q And, Dr. Anderson, if you could just 21 take as long as you would like to familiarize 22 yourself with this document, I'll just state for</p>

<p>1005</p> <p>1 the record these are documents that you produced 2 that have a Bates designation 1 through 17. 3 A Yes, I'm familiar. 4 Q What are these -- well -- strike that. 5 Have you ever seen Plaintiff's Exhibit 2 before? 6 A Yes. 7 Q What is it? 8 A It's a redacted copy of my personal 9 notes that I provided to you guys. 10 Q And are these -- I think you testified 11 in response to Mr. Nadelhaft's questioning that 12 the names Ann Henry and Joey Davis are pseudonyms. 13 A Yes. 14 Q And would you please just identify for 15 us who Ann Henry is in real life? 16 A Ann Henry and is Amber Heard. Joey 17 Davis is Johnny Depp. 18 Q And are these your notes that you took 19 contemporaneously of the for-couples -- strike 20 that. 21 Are these your contemporaneous notes 22 that you took of the couples therapy sessions?</p>	<p>1007</p> <p>1 generally, but I want to ask you in the context of 2 these 17 pages. 3 Did you prepare these 17 pages of 4 couples therapy notes in the ordinary course of 5 your treatment of Mr. Depp and Ms. Heard? 6 A Yes. 7 Q Did you maintain or keep them in the 8 ordinary course of your practice or business? 9 A I did. 10 Q So my question was, what is the 11 significance of October 1, 2015? 12 A I'm going to look at what I'm reading 13 so that this makes sense to you. This can't 14 possibly make sense, but it makes sense to me. 15 Q Okay. 16 A They reported what they said to one 17 another. So the first line is Ms. Heard talking, 18 saying that Mr. Depp says to her "No one likes 19 you. You're getting fame from me. I'm falling 20 out of love with you. You're a whore." 21 She's reporting, just in the first 22 session, just how bad the relationship is, just</p>
<p>1006</p> <p>1 A Yes. 2 Q Would these notes include any session 3 that you had for Ms. Heard that was not part of 4 the couples therapy? 5 A No. 6 Q Did you have any sessions with Mr. Depp 7 individually that weren't part of the couples 8 therapy? 9 A No. During this period of time, it's 10 color coded. Black is couples, red is Ms. Heard, 11 and blue is Mr. Depp. Whether I talked to them or 12 saw them individually or as a couple, it was all 13 in service of couples therapy. 14 Q Understood. And so these notes in 15 Plaintiff's Exhibit 2 encompass all of the couples 16 therapy sessions that you had with Mr. Depp and 17 Ms. Heard, either when they appeared together or 18 when they appeared separately, in the context of 19 your couples therapy; is that correct? 20 A I'm looking at one page. If you're 21 talking about the entire redacted document, yes. 22 Q And I've asked you the question</p>	<p>1008</p> <p>1 how mean they are to one another. 2 And at that point, because I'm typing 3 quickly as they go along, I'm switching into a 4 different voice more about the process between 5 them where she has, I believe, interrupted him. 6 He says no more about what she says about him, and 7 it's just that they're fighting and she has a hard 8 time -- she bites the bait. She can't let him 9 talk is my recollection and from this -- that's 10 kind of what that is. 11 So it gives me a sense of what they're 12 doing at home. They're each reporting, "This is 13 what we say to each other." 14 Q Okay. I appreciate that, Dr. Anderson. 15 I'm just going to try to break it down into little 16 bits. So October 1, 2015 is the date of the first 17 couples session, correct? 18 A Yes. 19 Q And 2 1/2 means two and a half hours 20 long from start to finish? 21 A I am guessing they were in -- they were 22 present for 2 1/2 hours, but that I waited</p>

<p style="text-align: right;">1009</p> <p>1 whatever the first – the ledger says, but I 2 waited an hour for them to show up. 3 Q And Dr. Anderson, in that first bullet 4 point that we can see, you write, "J says no one 5 likes you. Getting fame from me. Falling out of 6 love with you whore," J is Johnny Depp? 7 A Yes. But that was said by Ms. Heard. 8 Q So is it fair to say that Ms. Heard was 9 saying that Johnny said to her, "No one likes 10 you're. You're getting fame from me. I'm falling 11 out of love with you, whore," that would have come 12 from Mr. Depp; is that correct? 13 A Ms. Heard reported that that's what 14 Mr. Depp said to her at her worst, yes. 15 Q Did Amber -- when Mr. Depp told you 16 that Amber had hit him in the jaw, did Amber 17 respond in any way? Did she deny it? Did she 18 admit it? 19 A I don't think she denied it, but what I 20 believe, from my notes, was that they galloped – 21 she galloped off in a new direction and they 22 continued to talk and there was no more that</p>	<p style="text-align: right;">1011</p> <p>1 referring there? 2 A Don't have a clue. 3 Q If I could direct your attention 4 further down the page from plan, you see the 5 notation to October 6th, 2015? 6 A Yes. 7 Q Was that the second couples session? 8 A No. It's red. It's Amber alone. 9 Q So is it fair to say that you met alone 10 with Amber for 2 1/3 hours in the context of the 11 couples therapy; is that correct? 12 A Yes. This was to get her background 13 material. 14 Q So tell us what you mean in that one 15 section, "He hits her, no closed fist. She hits 16 back and now starts it for pride because" -- 17 A Father. 18 Q -- "hit her." Would you please tell us 19 what you meant by that? 20 A This is her reporting to me. It's the 21 only thing in this clinical session that 22 apparently was about physical abuse, or else it</p>
<p style="text-align: right;">1010</p> <p>1 Johnny Depp was going to say about what he was 2 reporting. It was more that they started into a 3 fight. 4 And I wrote that their process is a 5 back-and-forth firing at each other. At that low 6 point, he had some energy. And they don't 7 communicate. They had terrible skills. 8 Q At any point during the first session, 9 did Ms. Heard interrupt Mr. Depp when he was 10 trying to talk? 11 A Yes. She talked over him. She had 12 rapid-fire talking. 13 Q Did she interrupt him during your other 14 sessions that are reflected in Plaintiff's 15 Exhibit 2? 16 A Yes. And I pointed out the process to 17 her at some point, and she got it, that no one 18 could actually have a decent dialogue with her if 19 she was rapid firing and talking over and just 20 barraging. It was a process issue. 21 Q You write, "Doesn't answer directly 22 when he asks her a question." To what were you</p>	<p style="text-align: right;">1012</p> <p>1 would not have been redacted out. It's so when 2 she said in terms of physical abuse, that he hits 3 her, no closed fist means a open-hand slap to me, 4 and she says that she hits back and now she starts 5 it and sometimes hits him first because her 6 history is having been violated by her father 7 physically. And just out of pride, she – if 8 she's – a lot of things trigger her, and if she's 9 triggered, she would hit him first. 10 Q And the "he" you're referring to is 11 Johnny Depp, correct? 12 A Yes. 13 Q When you said that she sometimes hits 14 Johnny first because of pride, what did you mean? 15 A She was sensitive to feeling 16 disrespected and a number of other things, but – 17 and, so, and if she felt disrespected, she had 18 come out of her background history feeling that 19 her pride needed to be – needed to dominate and 20 she needed to stand up for herself. 21 Q When Ms. Heard told you that Johnny 22 Depp hits her or slaps her, Johnny Depp was not</p>

<p>1 present, correct? 2 A Correct. And it wasn't plural. It was 3 she referred to -- well, I wrote he hits her, yes. 4 So maybe it was plural. 5 Q But he was not present when she made 6 that assertion? 7 A He was not. 8 Q Did Ms. Heard tell you that she socked 9 Mr. Depp? 10 A Yes. She was describing kind of the 11 progression of the physical violence. 12 Q Did you have any understanding of what 13 she meant when she admitted that she socks 14 Mr. Depp? 15 A Yes, because there were three lines 16 above this that explained the progression a bit, 17 and I've already said what it was. She felt she 18 had to hit him back if he hit her, and so she 19 always did, and -- 20 Q And, again, that entry is from a 21 session where Mr. Depp was not physically present, 22 correct?</p>	<p>1013</p> <p>1 A Yes. But to clarify something earlier 2 on the ledger. 3 Q Yes? 4 A I wrote two hours couple then Amber. 5 It means he is the one who walked out of that 6 session. 7 Q My question was am I correct that all 8 of your notes for the October 14th, 2015 couples 9 session for three hours are completely redacted; 10 is that true? 11 A Yes. 12 Q So the next session occurred on 13 October 21, 2015, true? 14 A True. 15 Q And lasted two hours. It started as a 16 couple, then Mr. Depp left, and then you spoke 17 only with Amber but in the context of couples 18 therapy; is that right? 19 A Yes. 20 Q Okay. Let's go to the next session on 21 page 10. The next session was on October 24th, 22 2015, and I can't see from the code. Was that a</p>
<p>1014</p> <p>1 A That's right. 2 Q Okay. Let's move to the next session, 3 October 7, 2015, and this is a 3 1/2-hour session; 4 is that correct? 5 A Yes. 6 Q Was that an in-person session? 7 A Yes. 8 Q Did both Mr. Depp and Ms. Heard attend? 9 A No. This is blue. This is John's -- 10 Mr. Depp's intake. 11 Q Understood. And let's move, now, to 12 the -- toward the bottom of the page, and I think 13 I'm finally getting the code, right? So the next 14 session occurred on October 14th, 2015, and it was 15 the two of them for three hours; is that correct? 16 A Yes. 17 Q And that was another in-person session, 18 true? 19 A Yes. 20 Q And am I right to say that every single 21 piece of your notes as to the October 14th, 2015 22 session has been redacted; is that true?</p>	<p>1016</p> <p>1 couples therapy or was it just one or the other of 2 them attending? 3 A No, no, no. This is a red phone 4 session with Ms. Heard. 5 Q Okay. Great. And it lasted one and a 6 half hours? 7 A Yes. 8 Q So the next session after that was on 9 October 29th, 2015; is that right? 10 A Yes. 11 Q And that -- 12 A That one? No. That one was canceled. 13 Q Oh, it was canceled. That's why it's 14 so short. Okay. And then the one after that, 15 still on page 10, was on November 12th, 2015? 16 A There's an appointment on 11/4 that was 17 canceled that I didn't put an entry on. 18 Q Okay. No, that's helpful. 19 What about on November 12th? 20 A Yes. 21 Q Was that a joint session? 22 A Yes, it was.</p>

Transcript of Jury Trial - Day 4
Conducted on April 14, 2022

35 (1017 to
1020)

<p>1017</p> <p>1 Q And was that in person?</p> <p>2 A Yes.</p> <p>3 Q Okay. And then the next session on</p> <p>4 page 11 is -- that, even I can understand. So</p> <p>5 there was a no-show on December 4th, 2015; is that</p> <p>6 right?</p> <p>7 A Yes. I'd like to clarify the no-shows.</p> <p>8 Q Please do.</p> <p>9 A I think they both told me, but I think</p> <p>10 Mr. Depp told me at one point but I already knew</p> <p>11 because this happens with couples. When a couple</p> <p>12 is having a lot of trouble in sessions but they're</p> <p>13 doing well at home and they're in a little bit of</p> <p>14 a honeymoon, you know, period, they cancel instead</p> <p>15 of coming in because they know coming in will get</p> <p>16 them into conflict.</p> <p>17 Q Okay. And fair to say that that</p> <p>18 happened again on December 10th, 2015?</p> <p>19 A I can't tell which sessions they were</p> <p>20 sick or which sessions they were canceling because</p> <p>21 of this dynamic. But it was admitted and</p> <p>22 explained to me, and I understood it fully.</p>	<p>1019</p> <p>1 correct?</p> <p>2 A Yes.</p> <p>3 Q He was not present -- he was not on the</p> <p>4 call when she made these allegations, was he?</p> <p>5 A No.</p> <p>6 Q And you didn't see any of this, did</p> <p>7 you?</p> <p>8 A No.</p> <p>9 Q And you didn't see her in person --</p> <p>10 A No.</p> <p>11 Q -- after -- okay.</p> <p>12 Then there is a notation, "Should she</p> <p>13 call police?"</p> <p>14 A Where is that?</p> <p>15 Q That's right below what we were just</p> <p>16 talking about. In red it says, "Should she call</p> <p>17 police?"</p> <p>18 What does that refer to? So what did</p> <p>19 you mean?</p> <p>20 A That was her asking me.</p> <p>21 Q Did you respond to her?</p> <p>22 A I believe I did.</p>
<p>1018</p> <p>1 Q Okay. And still on page 11, the next</p> <p>2 session was on December 15th, 2015, and it was a</p> <p>3 telephonic session; is that right?</p> <p>4 A With -- yes, with Ms. Heard.</p> <p>5 Q That was with Ms. Heard, okay.</p> <p>6 You write then "Last night, Monday, she</p> <p>7 slapped him as he sat there talking incoherently."</p> <p>8 Who slapped who?</p> <p>9 A I actually -- I actually know what</p> <p>10 happened.</p> <p>11 Q What happened?</p> <p>12 A This was, as I said, Ms. Heard talking</p> <p>13 on the phone to me. Mr. Depp's mother was in ICU.</p> <p>14 He had been doing a lot of -- he was fucked up, as</p> <p>15 she would say, on a lot of drugs, and she slapped</p> <p>16 him because he was being incoherent and talking</p> <p>17 about another -- being with another woman.</p> <p>18 Q Did she tell you that he had hit her</p> <p>19 first? Or was she the one who initiated the slap?</p> <p>20 A She initiated that one because I think</p> <p>21 she felt demeaned and threatened.</p> <p>22 Q And this is what she reported to you,</p>	<p>1020</p> <p>1 Q Then you write, "Doesn't want to</p> <p>2 divorce. Wants to want to divorce."</p> <p>3 A Yes.</p> <p>4 Q What did you mean by that?</p> <p>5 A She loved him. He loved her. She</p> <p>6 believed that -- she wasn't stupid. She knew that</p> <p>7 what they were doing wasn't healthy, and so she</p> <p>8 wanted to want to divorce him, but she didn't.</p> <p>9 And yet it had escalated to this point, so she was</p> <p>10 trying to figure out what to do. And she had an</p> <p>11 entourage around her telling her what to do.</p> <p>12 Q Who was her entourage?</p> <p>13 A She had a routine group of friends that</p> <p>14 stayed with her, lived in her home, probably as</p> <p>15 well as paid people that I don't know.</p> <p>16 Q Do you recall the names of any of her</p> <p>17 entourage?</p> <p>18 A One was Rocky.</p> <p>19 Q Directing your attention to the last</p> <p>20 snippet from that session, "Will she have</p> <p>21 advantage if she leaves him but files with police</p> <p>22 for abuse first?"</p>

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<p>1021</p> <p>1 Was that a question that she asked you? 2 A Yes. This was her talking out loud, 3 trying to strategize for herself. 4 TECHNICIAN: Showing Plaintiff's 5 Exhibit 3 on the screen. 6 Q And, Dr. Anderson, I think this is the 7 same document that Mr. Nadelhaft showed you as 8 Anderson Exhibit 6. So I'm not going to ask you 9 to identify it again, but I do have a couple of 10 questions about it that Mr. Nadelhaft did not ask. 11 I believe you testified, and correct me 12 if I'm wrong, that you have never spoken to any of 13 Ms. Heard's other psychologists or therapists; is 14 that true? 15 A That's true. 16 Q And putting that aside, when she refers 17 to her own therapists in this exhibit, 3, do you 18 know the name of that person, putting aside 19 whether you had ever spoken to him or her? 20 A I do not. 21 Q Okay. Did Ms. Heard ever explain to 22 you why the nuances and complexity of her</p>	<p>1023</p> <p>1 island till last day. On island started to get 2 into something." 3 What did you -- what were you referring 4 to there? 5 A Well, Christmas had occurred, and the 6 goal was -- they had a lot of people going to his 7 island, and they were going to be together. And 8 the goal was to try and get through the Christmas 9 holiday without fighting. And so she was 10 reporting on that. 11 Q Okay. Then you write, "He got 12 aggressive, threatening. Didn't touch him. Hid 13 in bathroom." 14 What were you referring to there? 15 A What she reported to me, which was an 16 improvement, that she didn't participate. 17 Q So is it fair to say that she told you 18 she did not hit him at that time? 19 A Yes. That's what I believe my notes 20 say, yes. 21 Q Then you write, "She threw can at him 22 since home fighting, then she better."</p>
<p>1022</p> <p>1 relationship with Mr. Depp would be lost on her 2 own therapist? 3 A I believe that she felt known in a more 4 thorough way in terms of her behavior inside of 5 the relationship. 6 Q And let's pick up where we left off on 7 the bottom of page 11 of Plaintiff's Exhibit 2. 8 A Okay. 9 Q And specifically, the entry that begins 10 on January 13, it's at the very bottom of page 11, 11 literally the last line. Oh, that's it. 12 On January 13, 2016, was this a joint 13 session with Mr. Depp and Ms. Heard? Or was this 14 just with one of them? 15 A It was only Ms. Heard. And let me go 16 back and see if it -- it was phone. No, no, no. 17 I'm sorry. It was in person. No, no, no. That's 18 wrong. 1/13/16 was Ms. Heard in person. 19 Q And do you know how long this in-person 20 session was with Ms. Heard on January 13, 2016? 21 A I think it was probably just one hour. 22 Q Okay. You write, "Didn't fight on</p>	<p>1024</p> <p>1 Who is the "she" who threw a can at 2 him? 3 A Ms. Heard. 4 Q And the "him" whom she had threw a can 5 at was Mr. Depp, correct? 6 A Yes. 7 Q Did you receive that email on or about 8 March 8th in the morning at 6:23 a.m.? 9 A Well, apparently, because I responded 10 in the morning. 11 Q Okay. Well, then we'll skip it. We'll 12 go right back to your response. 13 So the response at the top of the page, 14 the second entry, I suppose, did you write that 15 email to Mr. Carino on March 8th, 2016 at 16 7:27 a.m.? 17 A I did. 18 Q And fair to say that you weren't 19 enthusiastic about the idea of making a house 20 call? 21 A I was not. 22 Q And Mr. Nadelhaft asked you about what</p>

<p>1025</p> <p>1 it was you wanted Johnny to understand about the 2 process. 3 A And I was wrong. Because I can see now 4 the date of it, looking at it more carefully, this 5 is after their relationship has devolved 6 considerably. So what I think, just guessing, was 7 earlier in the relationship. I don't know what it 8 was I wanted him to understand. 9 Q Let's go back to Exhibit 2, then, 10 please, and we're not going to repeat. We're just 11 picking up where we left off. And now we've 12 gotten up to page 13 of the 17 pages of your 13 notes. 14 So if we can start -- exactly. Do you 15 see where the notes of your session on June 18th, 16 2016 begin? 17 A Yes. 18 Q And was this a solo-session couples 19 session between you and Mr. Depp only? 20 A This is with Mr. Depp. It's blue; it's 21 just the two of us. 22 Q Gotcha. And it lasted 1 1/3 hours?</p>	<p>1027</p> <p>1 someone that Ms. Heard was in a relationship with. 2 Q Then you write, "Was chaotic, violent, 3 but gave as good as she got." What does that 4 mean? 5 A I believe I'm quoting -- I think I'm 6 quoting what -- some of this is just my typing of 7 the words he's using while he's talking. He's 8 also very verbal when no one's interrupting him. 9 And I think he talked about how chaotic it was; 10 how violent it was, and she gave as good as she 11 got. That's kind of a direct quote; those are not 12 my language. 13 Q Directing your attention further down 14 the page to the entry for July 13th, 2016, three 15 hours, Amber, in person. 16 Was that an in-person meeting you had 17 of couples therapy with only Ms. Heard? 18 A No. This is not couples therapy; this 19 is Ms. Heard by herself. I wrote "in person." 20 Q Okay. So just to be clear, what 21 follows, these are your notes for your individual 22 treatment of Ms. Heard having nothing to do with</p>
<p>1026</p> <p>1 A Yes. 2 Q You write, "Fight on her April 22nd 3 birthday. He late, huge fight. His mother died 4 on the 20th." 5 I think I know what you're referring 6 to, but if you could, please describe that for the 7 record. 8 A One second. This is when I got the 9 Scaramanga productions on my phone, so he found me 10 at home, which was new. Domestic violence charges 11 had already been made. His mother had just died 12 on the 20th. 13 Q Well, when he told you that there was a 14 fight on April 22 birthday, was that Ms. Heard's 15 30th birthday? 16 A I think it was. 17 Q And is he telling you that he arrived 18 late for the birthday dinner party and there was a 19 huge fight? 20 A Yes. 21 Q Do you know who Tasya van Ree is? 22 A Well, I know her name. I know she was</p>	<p>1028</p> <p>1 couples therapy? 2 A Not true. In my mind, the dust had not 3 settled on the couple yet, and this was just kind 4 of aftermath of the kind of falling-apart of the 5 marriage. 6 Q I didn't mean to mischaracterize 7 anything. I was just trying to suss out what it 8 was. 9 A No. This is not therapy for her; this 10 is about the marriage. 11 MR. CHEW: If we could please go to 12 Exhibit 6, Lucian, which is a new document -- when 13 I say "new," it was produced by Dr. Anderson's 14 office but new in the sense that Mr. Nadelhaft 15 didn't ask her about it. 16 Q Dr. Anderson, have you ever seen this 17 document before? 18 A Of course. I created it. 19 Q Okay. And what is it? 20 A It's a treatment summary when I was 21 first subpoenaed or my notes were required years 22 ago. My notes are jumbly. They don't say a lot.</p>

<p style="text-align: right;">1029</p> <p>1 They're confusing, as you've seen – or you 2 haven't seen, actually. 3 So I did what psychologists do. You 4 take – you go through all of those notes and your 5 brain, because it's not – if you're not left with 6 a very, you know, I hope, a very clear sense of 7 what went on. So I took everything I thought and 8 believed conceptually about them. I went through 9 all of my notes, and I wrote this treatment 10 summary. 11 Q And then if you could go -- 12 A The first paragraph is still there. 13 Q Yeah. And I want to ask you about that 14 one paragraph. 15 And I think you described this in the 16 course of your testimony; but I did want to ask 17 you about your sentence "She reported always 18 hitting him back as a point of pride but admitted 19 that she eventually initiated the hitting 20 herself." 21 Is the "she" you're referring to 22 Ms. Heard?</p>	<p style="text-align: right;">1031</p> <p>1 the information I wrote down, I'm saying it was 2 right after that fight. And she – my 3 recollection is she came in – she talked to me by 4 phone and then came in the next day, or at least I 5 thought that. Somewhere around the time she had 6 the injuries, I know she came in in person to show 7 me. 8 Q Did she show you photos? Or did she 9 show you -- 10 A Both. 11 Q You said she showed you photos. And 12 so, is it your testimony that she showed you 13 photos of her injuries shortly after the alleged 14 event? 15 A Somewhere in the period while she still 16 had injuries, she showed me photos, but she also 17 came in and showed me in person. 18 Q And what did she show you in person? 19 A Bruising on her face. 20 Q Other than the bruising on her face, 21 what else -- what other injuries did she show you? 22 A I don't remember. There may have been</p>
<p style="text-align: right;">1030</p> <p>1 A It is. 2 Q And is the "him" you're referring to 3 Johnny Depp? 4 A It is. 5 Q Okay. Let's move to the next page, 6 please. And I just want to focus on the one 7 snippet on Bates page 3. All right. You write, 8 "She reported trying to initiate a fight with him 9 one night by slapping him when she was offended by 10 what he said." 11 Is the "she" you're referring to there 12 Ms. Heard? 13 A Yes, it is. 14 Q And is the "he" you're referring to 15 Johnny Depp? 16 A Yes, it is. 17 Q Then in the last sentence, "It was also 18 at this time that she showed me photos of her 19 injuries." 20 When did Ms. Heard show you photos of 21 her alleged injuries? 22 A Well, to the best my pulling together</p>	<p style="text-align: right;">1032</p> <p>1 more, but I don't remember. 2 Q And you weren't present during the 3 alleged physical injuries, correct? 4 A Correct. 5 Q So the only basis you had with respect 6 to the cause of the injuries was what Ms. Heard 7 told you, correct? 8 A Yes. 9 Q And you write, "The physical violence 10 that occurred between them appeared to me to be 11 mutual." 12 You never actually witnessed any 13 physical violence by Mr. Depp or by Ms. Heard, 14 correct? 15 A Never. 16 Q And you said that they were each 17 victims of domestic violence, both in their 18 family -- they were each victims of domestic 19 violence in their families. 20 What did you mean by that? 21 A They were each beaten by parents. 22 MR. CHEW: Go back very briefly to</p>

Transcript of Jury Trial - Day 4
Conducted on April 14, 2022

39 (1033 to
1036)

<p>1 Exhibit 2. 1033 2 TECHNICIAN: Stand by. 3 Q Page 11. And after the part where -- 4 this refers to a session that was just you and 5 Ms. Heard, correct? 6 A Yes. 7 Q And this call, which was just between 8 you and Ms. Heard and not Mr. Depp involved, that 9 occurred on or about December 15th, 2015? 10 A Yes. 11 Q And was it just shortly after that call 12 when Ms. Heard showed you pictures and actually 13 came into your office; is that right? 14 A She came in on 12/17, so yes. 15 Q So Ms. Heard came in on December 17th, 16 and you saw bruises on her face; is that correct? 17 A I believe that's when. 18 Q Was that bruising that you observed 19 similar to the bruising that appeared on the 20 photographs that she showed you? 21 A Yes. 22 Q You testified that what you saw in</p>	<p>1035 1 Q You said it was -- so is it fair to say 2 those are small bruises in more than one place? 3 So there was -- how many one-inch-size bruises on 4 her face that you observed? 5 A I'm not a good person to ask this 6 question to. I don't really remember. I wasn't 7 looking to memorize it. I think there's other 8 data that will support this not from me. 9 EXAMINATION BY COUNSEL FOR THE DEFENDANT 10 BY MR. NADELHAFT: 11 Q A few minutes ago, you briefly spoke 12 about seeing bruises, about an inch, on Amber 13 Heard's face. 14 Do you recall that testimony? 15 A Yes. 16 Q And you were making motions with your 17 fingers. 18 A But I was saying multiple. I'm not 19 saying one. 20 Q Right. You were seeing multiple 21 bruises on Amber's face. 22 A Yes.</p>
<p>1034 1 person was similar to what you saw in the 2 photographs Amber gave you, correct? 3 A Yes. 4 Q When she came into your office on 5 December 17th, what did her face look like? 6 A What I recall is not purple, green, and 7 blue, but just a darkening, so kind of a dark -- a 8 darker gray/blue sort of thing. 9 But I don't have a photo of it. I 10 don't remember that well. 11 Q Is that, Dr. Anderson, consistent with 12 your understanding that there were no other 13 entries on December 15, or December 17th, relating 14 to physical abuse? 15 A You know, there was nothing about 16 physical abuse, nothing in that next session. It 17 was all about Christmas and getting her therapist 18 telling her one thing -- 19 Q What was the size of the bruise on her 20 face that you observed on December 17th? 21 A Maybe like this (indicating) in more 22 than one place, about an inch.</p>	<p>1036 1 Q When you were talking about how the 2 size of it, your fingers were under your eyes. 3 Did you -- do you remember seeing the bruises 4 under Amber's eyes? 5 A That's what I recall. They may have 6 been in other places throughout her body; I don't 7 remember. But I do remember her face. 8 Q Can you turn to page 13. 9 In the blue, where it says, "Was 10 chaotic, violent," do you know what Mr. Depp was 11 referring to there? 12 A What I said previously, and I'll say it 13 again: He's kind of doing a retrospective of 14 trying to understand the relationship and is 15 characterizing it as chaotic and violent, that she 16 gave as good as she got and she started it. You 17 know, he's complaining, but he's also just kind of 18 describing what the relationship was. 19 His mother is dead at this point. The 20 relationship is not -- it is not good. It's over, 21 pretty much. And he's trying to come to terms 22 with it. And he still loves her and is mourning.</p>

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<p style="text-align: right;">1037</p> <p>1 So he's just – he's a very articulate man, and 2 when left alone to speak, he can describe 3 intelligently what's going on. 4 I think I'm kind of – I think while 5 he's talking and I'm not trying to be intrusive 6 with my taking notes, I'm listening, I'm talking, 7 but I'm also copying down a word here and there. 8 So my belief is that those are his words. 9 Q And Mr. Depp, I think you testified 10 about this, but I just want to make sure, clear, 11 Mr. Depp told you Amber gave as good as she got, 12 correct? 13 A Correct. 14 Q Did you ask what Mr. Depp meant by 15 "gave as good as she got"? 16 A I was pretty aware of what he meant. I 17 agreed. 18 Q What did you understand Mr. Depp to 19 mean? 20 A I have – she initiated fights. She 21 started violence. She rose to the challenge if he 22 started first, which I – and so she – in my</p>	<p style="text-align: right;">1039</p> <p>1 correct? 2 A That's true. 3 THE COURT: All right. Thank you. 4 All right. Ladies and gentlemen, we'll 5 go ahead and take our lunch for the afternoon now. 6 No outside research. Do not talk to anybody, and 7 we'll give you till 2:15 okay? So you can be 8 excused with Deputy Halusa now. Thank you. 9 All right. For this afternoon, do you 10 need this TV any more for this afternoon? 11 MR. CHEW: We will need it. 12 THE COURT: For the first witness. 13 ATTORNEY 1: The last witness. 14 THE COURT: So we can put it down 15 during lunch? 16 MR. CHEW: One live witness, then one 17 more by video. 18 THE COURT: Okay. We'll be back at 19 2:15. Thank you. 20 (Recess taken from 1:06 p.m. to 21 2:13 p.m.) 22 THE BAILIFF: All rise.</p>
<p style="text-align: right;">1038</p> <p>1 opinion, that had been established throughout the 2 relationship, that she fought as hard as he did, 3 and he tried to deescalate far more than I think 4 she did. 5 Q Do you know did Mr. Depp talk about his 6 fingertip with you before June 18th, 2016? 7 A No. Because I would have written it 8 when he first mentioned it to me. 9 Q Did you ever see Mr. Depp with an 10 injury to his finger during any of your sessions 11 with Mr. Depp or counseling or, you know, sessions 12 together with Amber Heard? 13 A During that session, yes. 14 Q On June 18th, 2016, but before 15 June 18th, 2016, did you ever see an injury to 16 Mr. Depp's finger? 17 A No. But in – yes. No, I didn't. 18 EXAMINATION BY COUNSEL FOR THE PLAINTIFF 19 BY MR. CHEW: 20 Q When we were going through 21 Amber's -- the incidents where Amber described 22 Mr. Depp being violent, Mr. Depp was not present,</p>	<p style="text-align: right;">1040</p> <p>1 THE COURT: All right. Before jury 2 comes out, I just want to make sure on 3 Defendant's 397. The one we have in the binder 4 looks different from the one you had on the 5 screen. So, I'm not sure. The one on the screen 6 looked much more redacted, but maybe this is 7 redacted. 8 MR. NADELHAFT: I think the only things 9 that were redacted was the phone numbers. 10 THE COURT: So the emails are all 11 right? Everything. 12 MR. NADELHAFT: Fine with us. I think 13 it was -- we can go back and redact. 14 THE COURT: I just want to make sure 15 because seemed like the one on the screen had a 16 little more redaction than the one I'm seeing 17 here. 18 MR. NADELHAFT: I think it did. 19 MS. BREDEHOFT: Your Honor, I think it 20 was just the identifiers. 21 THE COURT: There are identifiers on 22 here, emails. There's no cell phones on here.</p>

Transcript of Jury Trial - Day 4
Conducted on April 14, 2022

41 (1041 to
1044)

1041	1 Those have been redacted. 2 MR. NADELHAFT: I didn't think the 3 emails were redacted. I thought they were the 4 same. 5 THE COURT: Okay. 6 MR. NADELHAFT: I'll do whatever the 7 Court -- 8 THE COURT: I don't care. I just want 9 to make sure everybody agrees that the one that I 10 have is the one that's in evidence. 11 MS. LECAROZ: I think, Your Honor, the 12 one that was on the screen did, in fact, redact 13 the email addresses also, which is not the one you 14 had. We can replace it. 15 MR. NADELHAFT: Did you redact it? 16 MS. LECAROZ: We didn't. David Murphy 17 redacted it. 18 MR. NADELHAFT: I apologize, Your 19 Honor. So we'll provide the redactions. 20 THE COURT: Is there any chance, in the 21 future, you guys can maybe talk ahead of time and 22 get these redacted ahead of time or something,	1043	1 then, just leaves me with 397, then, correct? 2 MS. BREDEHOFT: Well, and 3 Plaintiff's 548. 4 THE COURT: 548 also. 548 and 397 now. 5 MR. CHEW: And we expect to have that 6 to you this afternoon. 7 THE COURT: Okay. Perfect. 8 Anything else at this time? 9 MS. BREDEHOFT: I don't think so, Your 10 Honor. 11 THE COURT: Good, okay. 12 Ready for the jury. 13 (Whereupon, the jury entered the 14 courtroom and the following proceedings took 15 place.) 16 THE COURT: All right. Your next 17 witness, Mr. Chew. 18 MR. MONIZ: We call Gina Deuters, Your 19 Honor. 20 THE COURT: Say that again; I'm sorry. 21 MR. MONIZ: Gina Deuters. 22 THE COURT: Can you spell that last
1042	1 possibly? 2 MR. NADELHAFT: We're trying, Your 3 Honor. 4 MS. BREDEHOFT: I think we're figuring 5 that out as we go, You Honor. 6 THE COURT: I still have three pending 7 redaction now. 8 MS. BREDEHOFT: Right. And two of 9 them, I think we're ready with. 10 THE COURT: Look at the smile on your 11 face, Mr. Rottenborn. I see that. 12 MR. NADELHAFT: We're trying to make 13 you happy. 14 THE COURT: I know. He wants to be the 15 star of the day. 16 MS. BREDEHOFT: The third one, we just 17 exchanged redactions, so we're going to redo them, 18 hopefully, at the afternoon break. 19 THE COURT: Okay. So now I have 844, 20 the redacted copy, correct? And I have 210, the 21 redacted copy. 22 Okay. Perfect. All right. So that,	1044	1 name for me. 2 MR. MONIZ: D-E-U-T-E-R-S. 3 THE COURT: Thank you. 4 GEORGINA DEUTERS 5 A witness called on behalf of the 6 PLAINTIFF AND COUNTERCLAIM DEFENDANT, having been 7 first duly sworn by the Clerk, testified as 8 follows: 9 EXAMINATION BY COUNSEL FOR THE PLAINTIFF AND 10 COUNTERCLAIM DEFENDANT 11 BY MR. MONIZ: 12 Q And good afternoon, Ms. Deuters. 13 A Hi. 14 Q Would you please state your full name 15 for the record. 16 A Yes, it's Georgina Diane Deuters, but I 17 go by Gina. 18 Q Okay. And, Ms. Deuters, where are you 19 from? 20 A London. 21 Q And can you tell us a little bit about 22 what your occupation is? A I currently am a freelance creator who

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<p style="text-align: right;">1045</p> <p>1 kind of conceptualizes and shoots and edits 2 photographs and clips, largely for social media. 3 Q And how long have you been doing that? 4 A Just a few years. Before that, I was a 5 visual effects coordinator for movies. 6 Q And can you tell us, just very briefly, 7 what that means? 8 A It's basically the managing of the CG 9 and effects in films, the delivery of and, yeah, 10 just the managing of that, yeah. 11 Q And how long did you do that? 12 A Oh, from 2002 to 2016. 13 Q Okay. Any films we might recognize? 14 A Charlie and the Chocolate Factory. The 15 Dark Knight. A terrible Christmas movie that I 16 won't mention. Pirates of the Caribbean 4, yeah. 17 Q Do you know Johnny Depp? 18 A I do. 19 Q And how do you know Johnny Depp? 20 A He is a good friend of mine. 21 Q When did you first meet Mr. Depp? 22 A I met him summer of 2005. It was</p>	<p style="text-align: right;">1047</p> <p>1 personal assistant, and it's kind of developed 2 into producer/writer-type role with Johnny's 3 guidance. 4 Q So, for how long has he worked for 5 Mr. Depp, then? 6 A 18 years, I think. I think since 2004. 7 Q Now, over those 18 years, where has he 8 been working? 9 A All over the place. It depends on 10 where the film is being shot, so Bahamas, Hawaii, 11 London, LA. Kind of all over. 12 Q And where have you been during this 13 time? 14 A Well, Stephen and I, our first two 15 films, we worked on the same film, but then he 16 went off to do Pirates and I went off to do other 17 films. So I wouldn't always be with them. I know 18 that in between my projects, you know, Johnny was 19 always mindful that me and Stephen didn't spend 20 too much time apart, so he would usually be, you 21 know, kind enough to fly me out to be with them, 22 wherever they were.</p>
<p style="text-align: right;">1046</p> <p>1 actually at the Charlie and the Chocolate Factory 2 premiere. My husband Stephen introduced me to him 3 at a dinner after the premiere, and, yeah, he was 4 super sweet and warm and kind of ushered us to 5 join him at dinner. And I remember being very 6 nervous, like I am now. Yeah, that's when we 7 first met. 8 Q Okay. You say your husband, Stephen, 9 introduced you to Mr. Depp? 10 A Yeah. 11 Q How did your husband know him? 12 A I'm sorry? 13 Q How did your husband, Stephen, know 14 Mr. Depp? 15 A Oh, he started working with him on 16 Charlie and the Chocolate Factory. He started off 17 in production but then joined the Depp department 18 during the shoot. 19 Q And does he still work for Mr. Depp? 20 A Yeah. 21 Q In what capacity? 22 A Well, he started off as his, like,</p>	<p style="text-align: right;">1048</p> <p>1 Q Okay. About how many times would that 2 happen in a given year, if you can estimate for 3 us? 4 A Two to three. Yeah. I mean, there'd 5 be, like, sometimes I'd be with them like a month, 6 sometimes just a couple weeks. 7 Q Okay. All right. Can you just, 8 generally, describe for us, very briefly, your 9 husband's relationship with Mr. Depp? 10 A It's a great one. So, they are very 11 close professionally and personally. I know that 12 Stephen really respects Johnny, looks up to him, 13 and Johnny's been a mentor to him and has really 14 encouraged Stephen's career to develop. And 15 they're great friends too. 16 Q And can you just, very briefly and very 17 generally, tell us what it was like on those time 18 periods when you were spending time, chunks of 19 time with Mr. Depp and your husband? 20 A Well - 21 MR. NADELHAFT: Objection, Your Honor. 22 Relevance. And character testimony 404. I'm not</p>

<p>1 sure how this all relates. 2 MR. MONIZ: Basic foundational facts, 3 Your Honor. 4 THE COURT: I'll allow it. Go ahead. 5 A What was the question, sir? 6 Q Just generally describe for us what -- 7 A So if they were working, it would be, 8 you know, like on wrap, we're kept in it together, 9 and then I'd kind of entertain myself while the 10 boys went off to work. 11 If it was during downtime, it would 12 probably be, like, a family holiday, so it would 13 include his long-term partner, Vanessa, and their 14 little kids, which was always really lovely. 15 Really happy memories there. So it kind of 16 depended. 17 Q Okay. How well would you say you know 18 Mr. Depp? 19 A Very well. 20 Q Over the course of your friendship with 21 Mr. Depp, and I apologize, did you say it had been 22 17 years?</p>	<p>1049 1 of keeping count, but it's not -- it's not a 2 regular thing. It's sporadic. 3 Q And that's 20 times over what period of 4 time? 5 A Gosh, I think, like, the last, maybe, 6 ten years. 7 Q Okay. And how often have you seen 8 Mr. Depp consume alcohol? 9 A Since I've met him. 10 Q Okay. Can you describe for us how 11 Mr. Depp seems to respond to cocaine? 12 A I, quite honestly, can't gauge much 13 difference in his demeanor. You know, this stuff 14 kind of tends to make the average person a bit 15 chattier and maybe stays up a bit longer than they 16 should. But nothing out of the ordinary. 17 Q Okay. Same question for alcohol. How 18 would you say, based on your interactions with him 19 while he's drinking, how does he seem to respond 20 to it? 21 A Kind of annoying, but he doesn't -- he 22 holds his liquor very well, so, gosh, kind of more</p>
<p>1050 1 A I'm not good at math, but 2005 to now, 2 I think, is 17. 3 Q Okay. Over the course of your 4 friendship with Mr. Depp, have you ever seen 5 Mr. Depp take drugs? 6 A Yes. 7 Q And which ones? 8 A I've seen him smoke weed and 9 occasionally cocaine. 10 Q Okay. Have you ever seen him drink? 11 A Yes. 12 Q All right. Have you ever partaken in 13 any of these substances at the same time? 14 A Yes. 15 Q Okay. About how many times would you 16 estimate you've seen Mr. Depp use cocaine? 17 A Oh, gosh. I mean, it's usually, like, 18 kind of a celebratory event, like after a gig or a 19 party or something. Twenty. I don't know, twenty 20 times over the -- yeah. 21 Q About 20 times? 22 A About, yeah, yeah. I haven't been kind</p>	<p>1051 1 jovial or just -- I've never seen him -- I've 2 honestly never seen him like, drunk, drunk. Never 3 been with him in that kind of situation. 4 Q Does he seem to drink to excess, in 5 your experience? 6 A No. 7 Q Okay. Have you ever seen him get angry 8 or violent while on cocaine? 9 A No. Definitely not. 10 Q Have you ever seen him get angry or 11 violent while on alcohol? 12 A No. 13 Q Ms. Deuters, do you know Amber Laura 14 Heard? 15 A Yes. 16 Q And when did you first meet Ms. Heard? 17 A When did I? 18 Q Yes. 19 A Oh. Well, we met, kind of very 20 briefly, on the set of the Rum Diaries. You know, 21 just kind of quick greeting in the props tent, I 22 think.</p>

<p>1053</p> <p>1 Q Just so everybody's on the same page, 2 what is the Rum Diary?</p> <p>3 A The Rum Diary is a movie that we shot 4 in 2009, in Puerto Rico, and, yeah, it starred 5 Johnny and Amber, and I was there with Stephen. 6 That was one of the times when I wasn't working, 7 so I traveled out to be with Stephen and I was 8 around -- I did end up doing a little thing for 9 the visual effects department, but mostly it was 10 pleasure for me.</p> <p>11 Q Was there anything noteworthy about 12 your interactions with Ms. Heard on that occasion?</p> <p>13 A No.</p> <p>14 Q When did you next meet Ms. Heard?</p> <p>15 A When -- I think a couple years later, 16 The Rum Diary press tour, I went to the premiere 17 in London. And, again, it was just a kind of, you 18 know, greeting. It wasn't -- we didn't kind of 19 hang out, chat, party, or anything.</p> <p>20 Q And, again, so just so everybody's on 21 the same page. What is a press tour?</p> <p>22 A A press tour is when a film comes out,</p>	<p>1055</p> <p>1 ultimately, you know, Jerry Judge would be looking 2 after Johnny, so we'd kind of get updates to where 3 they're going and what he was doing. So in that 4 way, we got kind of, you know, notifications, or 5 notified that, you know, they got together.</p> <p>6 Q Okay. And you mentioned a name there, 7 Jerry Judge. Can you just tell the jury who that 8 is?</p> <p>9 A Okay. I don't want to be upset, but 10 Jerry Judge was Johnny's long-time security guy 11 and he -- this individual, we all loved him very 12 much. He was like family. He was like a dad and, 13 unfortunately, he passed away.</p> <p>14 Q When did you next see Ms. Heard after 15 the press tour in London?</p> <p>16 A Okay. That was, like, 2009.</p> <p>17 I think it was on a trip that we 18 accompanied Johnny and Amber on to Las Vegas for a 19 few days.</p> <p>20 Q And can you estimate for us, just 21 approximately, when that was?</p> <p>22 A Maybe that was 2012. I'm so sorry,</p>
<p>1054</p> <p>1 the actors and the director usually travel around 2 with the film and show it in different cities all 3 over the world, and the actors usually have to do 4 interviews to promote it and just get the word 5 out.</p> <p>6 Q Okay. And this was a press tour for 7 Rum Diary?</p> <p>8 A Yeah.</p> <p>9 Q And what city were you in?</p> <p>10 A I worked the London one.</p> <p>11 Q Okay. Does anything stand out to you 12 about your interactions with Ms. Heard on that 13 occasion?</p> <p>14 A No, she -- no.</p> <p>15 Q Okay. Were you aware, at that point, 16 that Mr. Depp and Ms. Heard had started a 17 relationship?</p> <p>18 A Yes.</p> <p>19 Q And how were you aware?</p> <p>20 A Because Depp's team, Johnny's team, 21 sorry, Johnny's team, there's just always an open 22 constant flow of information, you know, because,</p>	<p>1056</p> <p>1 like, I -- I'm blanking on the date. But it would 2 have been after they, you know, started seeing 3 each other, maybe a couple months afterwards. And 4 we just went out there for a few days.</p> <p>5 I don't remember if it was just, like, 6 a little excursion for them or if Johnny had 7 something to do there. I don't remember that. It 8 was just for, like, two or three days.</p> <p>9 Q Anything stand out to you about that 10 trip?</p> <p>11 A I was kind of excited to meet Amber, 12 you know, because she was Johnny's new girl and -- 13 but I remember kind of trying to, you know, kind 14 of make eye contact and -- yeah, I kind of felt a 15 bit ignored. Which is fine, you know, we're staff 16 or whatever, so, I didn't really chat with her.</p> <p>17 Q When you say "staff," what do you mean?</p> <p>18 A I mean, I'm not employed by Johnny, but 19 I'm obviously Stephen's wife and he's staff and, 20 yeah, I didn't really interact with her.</p> <p>21 Q So can you kind of describe what 22 happened when you saw her, then, if anything?</p>

Transcript of Jury Trial - Day 4
Conducted on April 14, 2022

45 (1057 to
1060)

<p>1057</p> <p>1 A No. Nothing to note. Just that she 2 didn't really engage or make, you know -- yeah, 3 just didn't really acknowledge our presence. 4 Q Okay. Did you see Mr. Depp and 5 Ms. Heard interact at all -- 6 A Yeah. 7 Q -- on that trip? 8 A Yeah. 9 Q Okay. Can you describe that for us? 10 A They seemed pretty in love. They were 11 tactile and, I don't know, they seemed happy. 12 Q Okay. When did you next meet 13 Ms. Heard? 14 A When Johnny and Stephen had gone out on 15 location to shoot the Lone Ranger, so I think that 16 might have been the next year. I don't have a 17 date, sorry. Yeah, so, you know, I think through 18 Johnny and Stephen, Amber and I were kind of put 19 in touch and we went vintage shopping together and 20 went to get a coffee once, and then with Johnny 21 and Stephen, kind of went into some galleries, art 22 galleries.</p>	<p>1059</p> <p>1 MR. NADELHAFT: Objection. Speculation 2 as to what Ms. Heard was thinking. 3 THE COURT: All right. I'll sustain as 4 to speculation. 5 Next question. 6 Q Were you out in public? 7 A Yeah. Yeah, yeah. Yes. 8 Q When you were interacting with 9 Ms. Heard in this time frame, did you notice, at 10 all, whether she was wearing makeup? 11 A No, I don't think she was wearing 12 makeup. She's naturally beautiful. I remember, 13 you know, just thinking how gorgeous her skin was 14 and how, you know, pretty she was. 15 Q I mean, how could you tell that she 16 wasn't wearing makeup? 17 A I consider myself to be quite the 18 makeup expert. Earlier on in my adult life, I got 19 hormonal acne, which was awful, so I got kind of 20 professional at covering that up. So I think I'm 21 pretty good at telling if someone's wearing, you 22 know, like foundation or concealer.</p>
<p>1058</p> <p>1 Q About how long would you say the period 2 was that you and Ms. Heard were together in this 3 time frame? 4 A How long were we both out on location? 5 Q Right. Yeah. 6 A I'm not sure about her. I know that I 7 personally made two trips, which seemed to 8 coincide with her being there. So, you know, it 9 was nice. And, you know, kind of meeting up to go 10 vintage shopping. She was really, really lovely. 11 Really sweet. We got along very well. And it was 12 fun. It was -- yeah. You know, she's very 13 charming. 14 Q Did you discuss her relationship with 15 Mr. Depp at all? 16 A I remember, like, going for a coffee 17 and she seemed a bit, just a bit kind of 18 frustrated that -- I don't think Johnny was ready 19 to go public with their relationship yet. And I 20 think that was, you know, frustrating for her. 21 Q Did you form an impression that she 22 wanted to go public immediately?</p>	<p>1060</p> <p>1 Q Have you ever heard of arnica cream? 2 A Yes, in fact, I actually was using it 3 the other week. 4 MR. NADELHAFT: Objection to -- 5 THE COURT: Can you use the microphone? 6 I'm having trouble hearing you. 7 MR. NADELHAFT: The question was, have 8 you ever heard of it, she answered it, and then 9 continued past. 10 THE COURT: She's answered the 11 question. 12 MR. NADELHAFT: She's answered the 13 question. 14 THE COURT: All right. If you want to 15 ask another question, that's fine. 16 MR. MONIZ: Sure, Your Honor. 17 Q What is it? 18 A It's a homeopathic lotion that you use 19 to help bruises heal faster. 20 Q And have you ever used it yourself? 21 A Yes. I was using it a couple weeks ago 22 because I had a huge bruise on my hip after I had</p>

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24727

<p>1061</p> <p>1 a fall.</p> <p>2 Q Okay.</p> <p>3 A Yeah, so, I know what it is.</p> <p>4 Q And can you just describe for those of</p> <p>5 us who have no idea, like myself, what does arnica</p> <p>6 cream look like?</p> <p>7 A Sorry, that was me. It's kinds of like</p> <p>8 a white emollient cream, opaque, that you rub into</p> <p>9 your skin, you rub into the bruise.</p> <p>10 Q Once it's been rubbed in, what does it</p> <p>11 look like?</p> <p>12 A Transparent.</p> <p>13 Q Okay. So is the bruise still visible?</p> <p>14 A Absolutely, yeah.</p> <p>15 MR. NADELHAFT: Objection. Leading.</p> <p>16 THE COURT: Sustain as to leading.</p> <p>17 MR. MONIZ: Okay, Your Honor.</p> <p>18 THE COURT: All right.</p> <p>19 Q After that, those interactions with</p> <p>20 Ms. Heard on the set of Lone Ranger in -- did you</p> <p>21 say 2013?</p> <p>22 MR. NADELHAFT: I don't believe she</p>	<p>1063</p> <p>1 Ms. Heard?</p> <p>2 A Yes.</p> <p>3 Q Okay. Did you witness any interactions</p> <p>4 between Mr. Depp and Ms. Heard on these trips?</p> <p>5 A I mean, just generally, on the plane.</p> <p>6 Nothing to note. There was an incident, like,</p> <p>7 when we all were at dinner together, when I say</p> <p>8 "we all," I mean, also, the other actors and the</p> <p>9 producers and director, and I noticed that Johnny</p> <p>10 was kind of hiding a drink on the side of his</p> <p>11 chair and taking secret sips. And I just -- I</p> <p>12 noticed, you know, she kind of saw that and was</p> <p>13 quite angry about it, and I couldn't hear what was</p> <p>14 said, but he seemed to get -- kind of getting told</p> <p>15 off by, you know, a telling off, which was kind of</p> <p>16 weird, you know, it was a bit like telling off the</p> <p>17 child.</p> <p>18 Q What was he drinking?</p> <p>19 A I think it was champagne.</p> <p>20 Q Okay. Like a flute of champagne?</p> <p>21 A Yeah, something like that.</p> <p>22 Q Did anything -- do you have any</p>
<p>1062</p> <p>1 testified to a date.</p> <p>2 THE COURT: I'm not sure that's an</p> <p>3 objection.</p> <p>4 MR. MONIZ: I'll withdraw the date,</p> <p>5 Your Honor.</p> <p>6 Q After your interaction with Ms. Heard</p> <p>7 on the set of The Lone Ranger, Ms. Deuters, when</p> <p>8 do you next recall seeing Ms. Heard?</p> <p>9 A I think it was on the press tour for</p> <p>10 The Lone Ranger. By that point, I believe their</p> <p>11 relationship was public and we traveled to Japan</p> <p>12 with the kids, Johnny's kids, and her friend,</p> <p>13 Brittany, who I think was, you know, along as a</p> <p>14 friend and also to help take care of the kids</p> <p>15 while, you know, Johnny was working.</p> <p>16 Q Okay. And why were you traveling to</p> <p>17 Japan again?</p> <p>18 A Because The Lone Ranger was premiering</p> <p>19 there and they were doing press. And we also</p> <p>20 traveled, like, to Berlin, I think, as well, and</p> <p>21 all around.</p> <p>22 Q Were you traveling with Mr. Depp and</p>	<p>1064</p> <p>1 impressions of -- how would you describe their</p> <p>2 body language when they were having the</p> <p>3 conversation?</p> <p>4 A Quite, you know, I think she was really</p> <p>5 angry, so -- I'm so -- yeah, I -- just kind of,</p> <p>6 like, dominant and just very angry and, you know,</p> <p>7 putting, just, telling, you know, him off.</p> <p>8 Q Okay. And how would you describe his</p> <p>9 body language?</p> <p>10 A I think, you know, quite, just</p> <p>11 exhausted by the whole being told off like a</p> <p>12 child.</p> <p>13 Q Okay. Over this period of time -- and</p> <p>14 just to clarify, were Ms. Heard and Mr. Depp</p> <p>15 public at this point?</p> <p>16 A Yeah.</p> <p>17 Q So it was --</p> <p>18 A Yeah, yeah, yeah. I mean, when we</p> <p>19 arrived at the airport, there was, like,</p> <p>20 photographers everywhere, and it wasn't -- it was</p> <p>21 very public, yeah.</p> <p>22 Q Over the period of time, then, after</p>

Transcript of Jury Trial - Day 4
Conducted on April 14, 2022

47 (1065 to
1068)

<p>1065</p> <p>1 they'd gone public, did you ever witness them 2 together? Did you have a perspective on their 3 interactions, in general? 4 MR. NADELHAFT: Objection. Relevance. 5 Foundation. 6 THE COURT: Is your mic on? There, now 7 it is. Thank you. Objection. 8 MR. NADELHAFT: Relevance. Foundation. 9 Leading. 10 MR. MONIZ: Well, their interactions 11 are directly relevant, Your Honor. I can lay a 12 foundation, if the Court wants. 13 THE COURT: If you want to lay a 14 foundation, that's fine. 15 Q Did you ever observe Ms. Heard and 16 Mr. Depp together in that time period? 17 A Can you repeat it? I know you said it 18 a few times, but could you just repeat it one more 19 time? 20 Q Of course. Over these next couple of 21 years, after the press tour for Lone Ranger, did 22 you have occasion to interact with Mr. Depp and</p>	<p>1067</p> <p>1 Q How would you describe their 2 interactions on those occasions, when you 3 witnessed them? 4 MR. NADELHAFT: Same thing, Your Honor. 5 Still no foundation. 6 MR. MONIZ: If she's present -- 7 THE COURT: I'll allow it. That's 8 fine. 9 MR. NADELHAFT: Okay. 10 A They seemed okay. I mean, you know, 11 they could be quite tense, but nothing to note. 12 Nothing I would remark on. 13 Q Were you invited to their wedding? 14 A Yeah -- yes. 15 Q And did you attend? 16 A Yes. 17 Q Okay. Can you, just generally, 18 describe for us what the wedding was like? 19 A It was definitely a predominantly Amber 20 event, in the sense that a large percentage of the 21 guests were her friends and family and, you know, 22 a lot of his friends and family couldn't make it</p>
<p>1066</p> <p>1 Ms. Heard at the same time? Did you see them 2 together? 3 A Very rarely. 4 Q Okay. 5 A Yeah. I'm thinking maybe a dinner here 6 or there. 7 Q Okay. 8 A Yeah. 9 Q From those occasions, when you did see 10 them, did you form any impressions about how they 11 were getting along, based on their interactions 12 with each other that you personally witnessed? 13 MR. NADELHAFT: I still don't think he 14 established the foundation. It's been a few times 15 that she saw them at a couple dinners and he asked 16 her, her perspective on the relationship. 17 MR. MONIZ: On those particular 18 occasions. 19 THE COURT: What's the relevance of her 20 impression? 21 MR. MONIZ: I'll rephrase, Your Honor. 22 THE COURT: Okay.</p>	<p>1068</p> <p>1 because it seemed to happen so quickly and, yeah, 2 they seemed to be having -- her and her friends 3 seemed to be having a wonderful time. 4 Q Where did the wedding take place? 5 A On Johnny's island in the Bahamas. 6 Q Okay. And did you have any 7 interactions with Ms. Heard during this time 8 period, or -- 9 A Yeah. 10 Q Strike that. 11 A Oh. 12 Q Did you talk to Ms. Heard when you were 13 at the wedding? 14 A Yeah. You know, there were dinners and 15 it was certainly a celebration every day. And 16 Amber and her friend Rocky gave me my first taste 17 of MDMA, you know, and everyone and all her 18 friends were on it, so I tried that for the first 19 time with them. Yeah. It was like a party 20 atmosphere. 21 Q Okay. Just briefly, can you sketch out 22 for us, in a little more detail, how you came to</p>

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24729

<p>1 take MDMA on that -- at the wedding? 2 A Oh, well, it was evening time. I think 3 I was a bit hungover from the day before, and I 4 can imagine those two saw me and when they first 5 dropped the pill into my hand, I thought it was 6 like a supplement, like a vitamin supplement to 7 make me feel better. So they quickly said it was 8 MDMA, and I kind of decided to throw caution to 9 the wind and just try it. 10 Q Okay. You mentioned that you traveled 11 with Mr. Depp and Ms. Heard to Japan and Berlin 12 and possibly other locations as well. 13 Can you tell us where else you've 14 traveled with them? 15 A Well, after the wedding, we headed to 16 Australia. 17 Q And why did you go to Australia? 18 A Because that's where Johnny would be 19 shooting Pirates 5. 20 Q Okay. And approximately when do you 21 think you were in Australia? 22 A I think that I flew with Johnny and</p>	<p>1069 1 MR. ROTTENBORN: We just got word that 2 this witness has been posting this week, on social 3 media, facts about this case, her opinion about 4 this case. I just wonder how someone who wasn't 5 around at any point during the relationship 6 considers themselves an expert, such as 7 Ms. Deuters. Here's a long letter that she posted 8 just this week. "Our dear friend got a few wins 9 in court this week, and, yet, some of us continue 10 to belittle him." 11 MR. MONIZ: I've never seen this, Your 12 Honor. This is not a witness under -- I mean. 13 THE COURT: Well, she's a witness. 14 She's obviously not supposed to be watching the 15 trial, correct? 16 MR. MONIZ: Well, yeah. 17 THE COURT: So I can ask her questions 18 on that. I will excuse the jury and I'll just ask 19 her a couple questions, okay? 20 MR. CHEW: Do you want me to send this 21 to Sammy or -- 22 THE COURT: No. I'm just going to ask</p>
<p>1070 1 Jerry Judge and Stephen and a few others. I think 2 that was February. And Johnny stayed in a house 3 and Stephen and I were based, like, a 35-minute 4 drive away on the shoreline, in the hotels. And I 5 think Amber flew in a while afterwards. 6 Q You said you thought it was February. 7 Do you recall the year? 8 A Yes, I do. 2015. 9 Q Okay. So just so we have the cast of 10 characters clear. Who, from this group, was in 11 Australia at this point? 12 A So we've got, on the plane that I was 13 on, it was Johnny, Jerry Judge, Stephen Deuters, 14 Debbie Lloyd, and myself, and maybe one -- maybe 15 one other. 16 Q Okay. You mentioned a name there I 17 don't think we've heard before. Can you just tell 18 the jury, quickly, who Debbie Lloyd is? 19 MR. NADELHAFT: Your Honor, may we 20 approach? 21 THE COURT: Okay. 22 (Sidebar.)</p>	<p>1072 1 her right now. 2 MR. CHEW: Okay. 3 THE COURT: All right. Ladies and 4 gentlemen of the jury, we just have to take a few 5 housekeeping matters up, so we're going to have 6 you take a recess for a few moments, okay? 7 Again, no outside research and don't 8 talk to anybody, okay? 9 (Whereupon, the jury exited the 10 courtroom and the following proceedings took 11 place.) 12 THE COURT: Ms. Deuters, I just had a 13 question for you. 14 Have you been watching the trial this 15 past week? 16 THE WITNESS: I've seen clips of it 17 online, yes. 18 THE COURT: You've been watching. So 19 you have seen parts of this trial? 20 THE WITNESS: Yeah. 21 THE COURT: Okay. And witness 22 testimonies?</p>

Transcript of Jury Trial - Day 4
Conducted on April 14, 2022

49 (1073 to
1076)

1073	<p>1 THE WITNESS: Yeah, I've seen clips. 2 THE COURT: All right. 3 Does anybody have any follow-up 4 questions? 5 MR. MONIZ: Ms. Deuters, have you been 6 watching -- 7 THE COURT: It doesn't matter. She's 8 been watching clips of witness testimony. 9 All right. You're excused, ma'am. 10 You're excused. Thank you. 11 MS. BREDEHOFT: Your Honor, we would 12 want -- 13 THE COURT: I will instruct the jury 14 they'll have to strike the testimony of 15 Ms. Deuters. There's a rule on witnesses, 16 Mr. Moniz. 17 MR. MONIZ: Understood, Your Honor. 18 This is the first we're -- 19 THE COURT: I believe that. I have no 20 doubt in my mind that this was the first you've 21 heard of it. 22 Have a good day, ma'am. Thank you.</p>	1075	<p>1 MR. MONIZ: Your Honor, may we 2 approach? 3 THE COURT: Sure. 4 MR. MONIZ: First of all, Your Honor, I 5 want to make sure that it's clearly understood. 6 The witness was advised on the rule on witnesses. 7 We had no knowledge that she was watching 8 anything -- 9 THE COURT: I have no doubt in my mind. 10 MR. MONIZ: I also want to clarify. 11 And we understand the rule on witnesses and this 12 is a done issue, but I do want to clarify that 13 even her violation order was really, I think, 14 unintentional. She was basically being tagged in 15 things on social media. She was not seeking out 16 clips, they were popping up on her feed. Again, 17 we're not arguing -- 18 THE COURT: No, she said that she 19 hadn't witnessed anything, but she was very 20 honest, which I do appreciate, that she was 21 watching. 22 MR. MONIZ: We also, as far as we can</p>
1074	<p>1 MS. BREDEHOFT: Your Honor, will tell 2 them to disregard -- 3 THE COURT: I got it the first time. 4 Thank you. 5 Your next witness is going to be on 6 deposition, right? 7 MR. CHEW: Yes, Your Honor. It's going 8 to be on video. 9 THE COURT: Okay. Did you want to just 10 take the afternoon recess now, before we -- 11 because we have to bring up the video. 12 MR. CHEW: Yes. 13 THE COURT: Okay. I'll take the 14 afternoon recess, then I'll instruct the jury, 15 okay? 16 We'll take 15 minutes. Let's come back 17 at 3:15. 18 THE BAILIFF: All rise. 19 (Recess taken from 2:54 p.m. to 20 3:13 p.m.) 21 THE BAILIFF: All rise. 22 THE COURT: Yes, sir.</p>	1076	<p>1 tell, the social media posts that were presented 2 to the Court as being from this week, we are 3 unable to identify them on her social media pages. 4 We understand that, from talking to her, she said 5 that they're -- again, I'm not arguing. 6 THE COURT: Right. 7 MR. MONIZ: But I do want to note that 8 we do take exception to the extent that there was 9 any kind of -- well, we understand that these were 10 old posts that were presented as new posts, and in 11 kind of an ambush form. So, we take exception to 12 that -- 13 THE COURT: I didn't mention the posts 14 while she was on the stand because I just wanted 15 to see if she had seen anything. I don't need the 16 posts or anything. Unless you want me to look at 17 them. 18 MS. VASQUEZ: Well, we do want you to 19 look at them. They're undated on purpose, Your 20 Honor, we believe on purpose. They were handed to 21 counsel for Ms. Heard by Eve Barlow. Eve Barlow 22 is sitting in the first row. She's a journalist</p>

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24731

Transcript of Jury Trial - Day 4
Conducted on April 14, 2022

50 (1077 to
1080)

<p style="text-align: right;">1077</p> <p>1 for the Guardian. She's also, I believe, friends 2 with Ms. Heard, or maybe more. 3 THE COURT: Okay. 4 MS. VASQUEZ: She has been passing 5 notes to Ms. Heard during this trial. She passed 6 up a cell phone with an undated screenshot picture 7 of Ms. Deuters' post that's two years old. That's 8 highly inappropriate in our view. 9 THE COURT: I agree. 10 MR. CHEW: We ask that she be removed 11 from the courtroom. 12 THE COURT: The first row is supposed 13 to be the legal team. 14 MR. CHEW: She's the girlfriend of 15 Ms. Heard who happens to work for the Guardian. 16 It's wildly inappropriate. She passed up that 17 misleading post to Ms. Heard. 18 MS. VASQUEZ: And passed up notes to 19 Ms. Heard during testimony, and I have photographs 20 of that. 21 THE COURT: That's fine. 22 MR. NADELHAFT: She's not --</p>	<p style="text-align: right;">1079</p> <p>1 was two years ago, which we just discovered. 2 THE COURT: I don't care, really, about 3 the semantics of that. I don't. I thought 4 everybody on the front row was the family just 5 sitting there or legal team passing notes back and 6 forth. If I knew she wasn't part of the legal 7 team, she wouldn't have been on the front row 8 anyway. Both sides, both sides, Ms. Bredehoft, 9 only people that are actually on your legal team. 10 We made that first row so you could have 11 communication with legal team, not with somebody 12 else, not with family, not with friends, okay? 13 MR. ROTTENBORN: Just for 14 clarification, we also said they were part of the 15 legal team -- 16 THE COURT: No. 17 MR. MONIZ: So just to be clear -- 18 THE COURT: Let's be clear, just people 19 who are employed in your office as legal people 20 that work for you. 21 MR. ROTTENBORN: I just want to make 22 sure. There's no intent to circumvent your order.</p>
<p style="text-align: right;">1078</p> <p>1 THE COURT: Nobody of the legal team. 2 We don't go out into the audience picking things 3 from different people. 4 MS. BREDEHOFT: She's a personal 5 friend. She's traveling with her to and from. 6 THE COURT: Doesn't matter. From now, 7 on the front row, it's only legal team, okay? No 8 family on front row for either side. I said only 9 legal team in the front row. There's plenty of 10 seats in the courtroom. 11 MR. CHEW: Your Honor, we ask that she 12 be excused. 13 THE COURT: As long as she's not in the 14 front row and they have no contact. 15 MS. VASQUEZ: Shouldn't be allowed. 16 She has her laptop open, You Honor. 17 MR. CHEW: She's passing -- 18 THE COURT: She can't have her laptop 19 open anymore because she's not going to be in the 20 front row. 21 MR. CHEW: She's the one that passed 22 that to Mr. Rottenborn without a date. That date</p>	<p style="text-align: right;">1080</p> <p>1 THE COURT: Well, we're going to -- 2 this is what we're going to do now, maybe I didn't 3 make myself clear enough. There was a lot of 4 family in and I can see where there's confusion, 5 but I think we just make a clear-cut rule now that 6 only people that work for you are on the front row 7 so you can interact with them to get files or 8 folders, which was the whole intention to begin 9 with, okay? 10 MS. BREDEHOFT: So, for example, there 11 are a couple that come up, and she will come sit 12 in court -- 13 THE COURT: They can have no 14 electronics, no nothing. They're just spectators. 15 MS. BREDEHOFT: Okay. I understand. 16 THE COURT: There's no emailing back 17 and forth, anything like that. Everybody 18 understands me, right? Clear, clear, clear, 19 everybody's clear, right? 20 MR. MONIZ: We apologize for the 21 disruption. 22 THE COURT: All right. So why don't we</p>

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24732

Transcript of Jury Trial - Day 4
Conducted on April 14, 2022

51 (1081 to 1084)

1081	<p>1 go ahead and get that situated, inform everybody 2 on those rows right now, and then we'll go from 3 there. 4 MS. BREDEHOFT: And we'll have the 5 redacted exhibits for you. 6 THE COURT: Okay. 7 MS. BREDEHOFT: Thank you, Your Honor. 8 MR. CHEW: Thank you, Your Honor. 9 THE COURT: You're welcome. 10 MS. BREDEHOFT: When we included the 11 names. We also included Amber's assistant because 12 she's been sitting there. 13 THE COURT: This is everybody, 14 everybody? 15 MS. BREDEHOFT: I just want to be clear 16 to make sure we did it right. 17 THE COURT: Everybody. 18 MR. CHEW: Thank you, Your Honor. 19 MS. BREDEHOFT: This is, of course, 20 redactions as the two redactions, everything but 21 the two that we brought in through the blue. 22 THE COURT: Okay.</p>	1083	<p>1 it, Your Honor. 2 THE COURT: Maybe the text right before 3 Mr. Depp's response or the text right afterward, 4 whichever one initiated it. Can we do that, just 5 to get context? 6 So can we work a little bit on that? 7 MS. LECARAZ: We're working on it, Your 8 Honor. 9 THE COURT: Keep going. I appreciate 10 it. 11 (Open Court.) 12 MS. BREDEHOFT: This is 397 with the 13 redactions, Your Honor. 14 THE COURT: Make sure they're agreeable 15 redactions first. 16 MR. CHEW: We're fine with it. 17 THE COURT: Okay. So, 397 with these 18 redactions. If I don't give it to Jamie now, I'll 19 forget. That takes care of 397. 20 We're going to have to start the video 21 tonight and we'll probably have to finish it 22 tomorrow morning, correct, by the looks of it?</p>
1082	<p>1 MS. LECARAZ: Our position is that in 2 the plaintiff's exhibit, for fairness, we need to 3 put those in context, so we've redacted personally 4 identifying in all but -- all the texts between 5 Mr. Baruch and Mr. Depp. 6 THE COURT: Do you have any objection? 7 MS. BREDEHOFT: We have an objection 8 because those weren't brought in through 9 Mr. Baruch, and it's hearsay, and they include 10 texts from Mr. Baruch and he didn't testify to 11 them. 12 THE COURT: I still have to read some 13 of them. 14 MS. BREDEHOFT: Okay. 15 MS. LECARAZ: There's a lot. Looks 16 like it contains over a hundred entries. 17 THE COURT: So some of these contain 18 hearsay, though, I guess is the issue. We may 19 want to have context. Is it possible to get 20 context of what he said, maybe, right before it? 21 Can we tone it down maybe to the -- 22 MS. LECARAZ: We can keep working on</p>	1084	<p>1 MR. CHEW: Yeah. 2 THE COURT: And are the exhibits -- so 3 you're going to be switching back and forth again? 4 MR. MONIZ: I think, Your Honor, that 5 we're just going to run it off of our -- I believe 6 the parties worked out the redactions, I think. I 7 could be wrong. 8 THE COURT: Are there any objections to 9 the exhibits? 10 MR. NADELHAFT: I don't think we talked 11 at all about what exhibits are coming in. 12 THE COURT: That's music to my ears. 13 MR. NADELHAFT: I know. I don't think 14 we had any -- we've just exchanged the objections 15 for this. 16 MR. MONIZ: Well, in that case, I think 17 we're handling introducing those, to the extent 18 they get introduced, and we'll discuss any 19 objections. 20 MR. NADELHAFT: That's how I understand 21 it. 22 THE COURT: So we're going to do</p>

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24733

Transcript of Jury Trial - Day 4
Conducted on April 14, 2022

52 (1085 to
1088)

1085	<p>1 objections as we get to them? That's fine. I 2 don't have a problem with that. That works out. 3 So we'll start it. When we're at 5:00, 4 we'll see where we are and we'll find a good 5 breaking point. 6 MR. NADELHAFT: Thank you, Your Honor. 7 THE COURT: Are we ready for the jury, 8 then? Making sure you're ready. 9 You're ready? All right. Thank you. 10 (Whereupon, the jury entered the 11 courtroom and the following proceedings took 12 place.) 13 THE COURT: All right. Thank you, 14 ladies and gentlemen. 15 Ladies and gentlemen, the Court is 16 striking Ms. Gina Deuters' testimony, in its 17 entirety, from the record; therefore, the Court 18 further instructs you, the jury, to disregard her 19 testimony in its entirety. 20 Understand? 21 All right. Thank you. 22 All right. Your next witness.</p>	1087	<p>1 you provide concierge healthcare. What does that 2 mean? 3 A That means I provide healthcare on a 4 retainer-based arrangement. 5 Q What do you mean by "retainer-based 6 arrangement"? 7 A Patients pay an annual fee and all 8 services are included. And I'm available 24/7. 9 Q Now, you also practice -- part of your 10 practice is addiction treatment; is that correct? 11 A Correct. 12 Q And you've written a book on addiction? 13 A Yes. 14 Q What's the title of the book? 15 A "The Addiction Solution." 16 Q And by "addiction," do you mean 17 addiction to drugs and alcohol? 18 A Yes. 19 Q Is there any other addictions that you 20 practice treating? 21 A Well, there are behavioral addictions, 22 but those are far less common.</p>
1086	<p>1 MR. MONIZ: Your Honor, we call 2 Dr. David Kipper by video designation. 3 THE COURT: All right. Dr. Kipper. 4 EXAMINATION BY COUNSEL FOR THE PLAINTIFF AND 5 COUNTERCLAIM DEFENDANT 6 BY MR. NADELHAFT: 7 Q I represent Amber Heard could you 8 please provide your full name. 9 A David Alan, A-L-A-N, Kipper, 10 K-I-P-P-E-R. 11 Q And what is your business address, 12 Dr. Kipper? 13 A 153 South Lasky, L-A-S-K-Y, Drive, 14 Beverly Hills 90212, California. 15 Q Now, you're a doctor, correct? 16 A Yes. 17 Q An internist? 18 A Yes. 19 Q How long have you been practicing 20 medicine? 21 A Since 1977. 22 Q And I noticed on your website, it says</p>	1088	<p>1 Q And in your practice, you've dealt with 2 patients who have blacked out from drugs or 3 alcohol? 4 A Yes. 5 Q Who is Lisa Beane? 6 A A former employee in my office. 7 Q And what was Ms. Beane's role in your 8 office? 9 A She was a receptionist. 10 Q And how long did Ms. Beane work for 11 you? 12 A I don't have that specific information. 13 I believe it was about three years. 14 Q In working with Ms. Beane, did you find 15 her to be honest? 16 A No, actually. 17 Q Why was she not honest? 18 A She was inappropriate with certain 19 patients, beyond what I considered to be 20 professional. She discriminated in some regards 21 to some patients. She was divisive in the office 22 and created a lot of problems with the other</p>

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24734

1089	<p>1 staff.</p> <p>2 Q Did you terminate her?</p> <p>3 A Oh, no. She quit.</p> <p>4 Q And who is Debbie Lloyd?</p> <p>5 A Debbie Lloyd is a nurse that I have</p> <p>6 known for many years who has worked with me on</p> <p>7 home care and addiction cases.</p> <p>8 Q And is Ms. Lloyd an employee or a</p> <p>9 contractor with you?</p> <p>10 A She's a contractor.</p> <p>11 Q Does she still contract with you,</p> <p>12 Ms. Lloyd?</p> <p>13 A Yes, until recently. She now has a new</p> <p>14 position, so I'm not able to have her services at</p> <p>15 this point.</p> <p>16 Q What was Ms. Lloyd's role in Mr. Depp's</p> <p>17 care?</p> <p>18 A She served as his RN, as his registered</p> <p>19 nurse.</p> <p>20 Q And was Ms. Lloyd paid by you for</p> <p>21 Mr. Depp's care?</p> <p>22 A Yes.</p>	1091	<p>1 A Somewhere in the spring of 2014.</p> <p>2 Q And do you recall how you -- who first</p> <p>3 referred you to Mr. Depp?</p> <p>4 A He was referred by another patient.</p> <p>5 Q Did you talk to Tracey Jacobs at all</p> <p>6 about Mr. Depp?</p> <p>7 A Yes.</p> <p>8 Q What did you understand the business</p> <p>9 relationship was between Ms. Jacobs and Mr. Depp?</p> <p>10 A That she was his agent.</p> <p>11 MR. NADELHAFT: Alex, why don't we put</p> <p>12 up -- Alex, can you put up Kipper 3, please.</p> <p>13 Q Dr. Kipper, do you recognize this</p> <p>14 document?</p> <p>15 A Yes, I do.</p> <p>16 Q And what is it?</p> <p>17 A This is an intake evaluation that I had</p> <p>18 with Mr. Depp regarding his treatment.</p> <p>19 Q And do you keep these notes in the</p> <p>20 normal course of business?</p> <p>21 A Yes.</p> <p>22 Q And the notes are meant to be accurate?</p>
1090	<p>1 Q So would it work that you would bill</p> <p>2 Mr. Depp for the care that you gave and Ms. Lloyd</p> <p>3 gave, and then she would get paid from that?</p> <p>4 A Yes.</p> <p>5 Q And who is Erin Boerum?</p> <p>6 A She's an RN that was employed to help</p> <p>7 care for Amber.</p> <p>8 Q Was Ms. Boerum also a contract nurse?</p> <p>9 A Yes.</p> <p>10 Q And so did she -- did Ms. Boerum have</p> <p>11 any role in Mr. Depp's care?</p> <p>12 A Only if Debbie was unavailable, Erin</p> <p>13 would step in and vice versa.</p> <p>14 Q And did Ms. Boerum work with you on</p> <p>15 anybody else besides Mr. Depp or Ms. Heard?</p> <p>16 A Yes.</p> <p>17 Q Does Ms. Boerum still work with you?</p> <p>18 A Ms. Boerum now has two little kids, so</p> <p>19 she's not really available.</p> <p>20 Q I understand. I have two kids myself.</p> <p>21 When were you first contacted about</p> <p>22 treating Mr. Depp?</p>	1092	<p>1 A Yes.</p> <p>2 Q And did you take the notes or did</p> <p>3 someone take them for you?</p> <p>4 A I took these notes.</p> <p>5 Q Is May 22nd, 2014 the first time that</p> <p>6 you met Mr. Depp?</p> <p>7 A No.</p> <p>8 Q When did you --</p> <p>9 MR. NADELHAFT: Your Honor, I would</p> <p>10 move to admit Defendant's Exhibit 220, which is</p> <p>11 what Dr. Kipper was referring to there.</p> <p>12 THE COURT: Any objection to 220,</p> <p>13 Defendant's 220?</p> <p>14 MR. MONIZ: Yes, Your Honor.</p> <p>15 Foundation. Authentication. Hearsay. And 403.</p> <p>16 THE COURT: All right. Let me catch</p> <p>17 up. I can get it here. That's fine.</p> <p>18 220?</p> <p>19 MR. NADELHAFT: And, Your Honor,</p> <p>20 Dr. Kipper testified just now that these are his</p> <p>21 notes that he keeps in the regular course of</p> <p>22 business of his meeting with -- his initial</p>

Transcript of Jury Trial - Day 4
Conducted on April 14, 2022

54 (1093 to
1096)

1093	1 consultation with Mr. Depp, which is what he does 2 as a doctor and, you know, it's his medical 3 records of his report with Mr. Depp. So I think 4 he's established the foundation of that. 5 THE COURT: All right. Yes, sir. 6 Any response, Mr. Moniz? 7 MR. MONIZ: We're just having a slight 8 technical issue pulling up the exhibit, Your 9 Honor. I apologize. One minute. 10 THE COURT: That's fine. 11 MR. MONIZ: Your Honor, we would stand 12 on the hearsay and relevance objections. There's 13 a lot of material in this document that is not 14 really germane to the issues in this case. At 15 minimum, to the extent it's admitted, it should be 16 admitted in redacted form. 17 In addition, it's not clear that 18 there's any hearsay exception that would apply to 19 everything in here. Not everything in here is a 20 statement of a party, I don't believe. 21 And finally, the medical records 22 reflected here go well beyond any possible	1095	1 THE COURT: Okay. 2 MR. NADELHAFT: Thank you, Your Honor. 3 I guess, can we publish it to the jury? 4 THE COURT: Not if you're watching. 5 MR. NADELHAFT: Oh. The way we've -- 6 that's fine, Your Honor, we can just have him 7 testify. That's fine. 8 THE COURT: Okay. 9 MR. NADELHAFT: Thank you, Your Honor. 10 THE COURT: Uh-huh. 11 BY MR. NADELHAFT: 12 Q -- prior to May 22nd, 2014? 13 A I met him a couple months before that 14 as just an initial introduction to discuss 15 possible treatment. 16 Q And where were you when you first met 17 Mr. Depp? 18 A He met me at my home office. 19 Q And were there any -- did you have any 20 notes of that meeting at the home office? 21 A No. 22 Q What did you discuss with Mr. Depp at
1094	1 relevance to the issues in this case. It's not 2 appropriate. We would stand on that objection. 3 MR. NADELHAFT: All the statements in 4 here are statements of Mr. Depp, so they'd either 5 be a party admission or use -- and it's 6 Dr. Kipper's -- it's his evaluation of Mr. Depp to 7 treat him for his, as you'll see, his addictions, 8 so it's all relevant. There's no hearsay. If 9 there is, it meets the exception, as it's all 10 Mr. Depp's statements. They've not even argued 11 this, but it's clearly a business record. 12 MR. MONIZ: It's clear from the 13 document, Your Honor, that there's more in here -- 14 that the records here are, at minimum, broad or 15 not germane to this case. I mean, this goes well 16 beyond any medical records that could conceivably 17 be relevant, we would respectfully submit, to the 18 issues in this case. 19 THE COURT: I understand. Given the 20 latitude as to family history and family medical 21 history, I'll allow 220 into evidence, okay? 22 MR. MONIZ: Understood, Your Honor.	1096	1 that first meeting? 2 A At that meeting, I discussed with him 3 my involvement in helping him with his substance 4 issues. 5 Q And what substance issues did he say he 6 had? 7 A So, to answer your question, Mr. Depp 8 was seeking treatment for substance abuse and 9 wanted to detoxify from his substance abuse. 10 Q Did he mention -- did Mr. Depp say what 11 substances he was trying to detox from? 12 A Yes. And as indicated in this note, it 13 was polysubstance. So, there was alcohol, 14 opiates, benzodiazepines, and stimulants. 15 Q So, you referenced the note, which is 16 Kipper 3, in your meeting with Mr. Depp in the 17 months before May 22nd, 2014, Mr. Depp was looking 18 to detox from alcohol, opiates, benzo, and 19 cocaine? 20 A Those substances were in his history. 21 The substance that he was, at that point, 22 concerned about, and abusing, were opiates.

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<p style="text-align: right;">1097</p> <p>1 Q And when you say he was concerned about 2 the substance he was abusing was opioids, was this 3 in the conversation before May 22nd, 2014? 4 A I can't remember specifically. 5 Q Okay. So you had this initial 6 conversation with Mr. Depp, and then you had this 7 initial consultation with him a few months later; 8 is that correct? 9 A Yes, that's correct. 10 Q And you met with Mr. Depp in Boston? 11 A Yes. 12 Q And Mr. Depp was filming a movie at the 13 time? 14 A Yes. 15 Q And in your notes, you say he had a 16 history of self-medicating behaviors involving 17 multiple substances of abuse. These include 18 alcohol, opiates, benzodiazepines, and stimulants 19 cocaine. 20 Is that accurate, what he told you? 21 A Yes. That statement's in my notes, 22 correct.</p>	<p style="text-align: right;">1099</p> <p>1 third page, that was your impression of Mr. Depp 2 at the time of May 22nd, 2014? 3 A Yes. 4 Q And under that, the plan, that's 5 documenting your plan for Mr. Depp going forward? 6 A Correct. 7 Q Did Mr. Depp pay for this visit? 8 A Yes. 9 Q When was the plan to start treatment of 10 Mr. Depp? 11 A After his -- after he completed his 12 current film. 13 Q Dr. Kipper, do you recognize Kipper 14 Exhibit 4? 15 A Yes. 16 Q And what are the -- what is Kipper 17 Exhibit 4? 18 A It's a progress note of -- dated 19 June 11, '14, 2014. 20 Q And do you keep these notes in the 21 normal course of business? 22 A Yes.</p>
<p style="text-align: right;">1098</p> <p>1 Q Okay. And with -- and in addition to 2 opiates, was Mr. Depp addicted to any other 3 prescription drugs? 4 A No. Other than opiates, no. 5 Q What was Roxicodone? 6 A It's an opiate. 7 Q And what is Adderall? 8 A Adderall is a stimulant. 9 Q Okay. And was Mr. Depp addicted to 10 Adderall? 11 A No. 12 Q What is Xanax? 13 A Xanax is a benzodiazepine. 14 Q This first paragraph on this page, 15 these are notes based off of your discussion with 16 Mr. Depp? 17 A Yes. 18 Q And then on the second page, where it 19 says "physical examination," that's just what you 20 conducted at the time, on Mr. Depp? 21 A Yes. 22 Q And where it says "impression," on the</p>	<p style="text-align: right;">1100</p> <p>1 Q And did you take these notes? 2 A Yes. 3 Q And the notes are meant to be accurate, 4 correct? 5 A Yes. 6 Q Okay. You mentioned it before -- 7 MR. NADELHAFT: Can we pause the video. 8 Your Honor, if you can pause it. 9 THE COURT: It takes a second for it to 10 catch up. 11 MR. NADELHAFT: I understand. 12 THE COURT: Thank you. 13 MR. NADELHAFT: Your Honor, I move for 14 the admission of Exhibit 246. 15 THE COURT: 246. 16 MR. NADELHAFT: It's the same type of 17 medical record that was just admitted for 220. 18 THE COURT: Any objection? I'll give 19 you a moment to read it. 20 MR. MONIZ: Thank you, Your Honor. 21 Just one moment. Understanding Your Honor's 22 ruling on the last record, I think we'll</p>

<p style="text-align: right;">1101</p> <p>1 anticipate that the exhibit can come in. 2 THE COURT: All right. So I will take 3 that as no objection. 4 All right. 246 in evidence. Thank 5 you. 6 MR. NADELHAFT: Thank you. 7 A Multiple substance issues. Multiple 8 substance abuse. 9 Q And you were treating Mr. Depp for 10 multisubstance abuse, correct? 11 A I was going to be treating Mr. Depp for 12 opiate issues. 13 Q On the bottom of the first page, where 14 it says "impression," that was your impression of 15 Mr. Depp at the time, where it says "polysubstance 16 abuse"? 17 A Yes. 18 Q And were these the drugs that Mr. Depp 19 was taking at the time, which is at the bottom of 20 page 1 of Kipper 4? 21 A I'm sorry, can you -- am I relating to 22 the first entry under impression?</p>	<p style="text-align: right;">1103</p> <p>1 And Mr. Depp was also going to undergo 2 a sobriety program; is that correct? 3 A Yes. 4 Q And it says "To be regularly drug 5 tested in my office." 6 How regularly was he to be drug tested, 7 Mr. Depp? 8 A That was dependent upon his progress 9 and my understanding of how he was doing. 10 Q And if he was progressing well, how 11 often would Mr. Depp be drug tested? 12 You can answer. 13 A The answer is what I said, it would 14 really depend, Adam, on how he was doing at the 15 time and how he was progressing through his 16 treatment. 17 Q Do you recall how many drug tests you 18 gave Mr. Depp in 2014? 19 A No. 20 Q You gave him at least one, correct? 21 A Yes. 22 Q Okay.</p>
<p style="text-align: right;">1102</p> <p>1 Q It says -- what does it mean where it 2 says dopaminergic imbalance with lithium 300 MG 3 BID to be increased 300 MG TID? 4 A Those were medications that I had 5 planned to use upon our treatment. 6 Q For all the medications that are in 7 Kipper 4 under impression, those are medications 8 you planned to use with Mr. Depp; is that correct? 9 A That's correct. 10 Q And on the next page, where it talks 11 about opiate dependence, you write, will maintain 12 on current Norco dosage TID until current filming 13 is completed in mid to late July. Mr. Depp agrees 14 to undergo detoxification with Clonidine, Robaxin, 15 Benty] and antiolytics. I can't pronounce it, I'm 16 sorry. 17 A Yeah, you did a good job. That's what 18 it says, yes. 19 Q What does "TID" mean? Do you see where 20 it says -- 21 A Three times a day. 22 Q Three times a day. Okay.</p>	<p style="text-align: right;">1104</p> <p>1 A I believe so. I'd have to check 2 through my records. 3 Q Okay. And Deborah Lloyd was going to 4 be Mr. Depp's nurse, correct? 5 A Correct. 6 MR. NADELHAFT: You can take down 7 Kipper 4. And can you put up Kipper 5, please. 8 MR. MONIZ: And, Your Honor, we would 9 move into evidence Plaintiff's Exhibit 40. 10 THE COURT: Plaintiff's Exhibit 40. 11 Is there any objection? 12 MR. NADELHAFT: So, am I understanding 13 you're putting in -- you want to move in the 14 entire document, 123 pages? 15 MR. MONIZ: We have redacted portions 16 of it. 17 MR. NADELHAFT: Okay. 18 MR. MONIZ: Yeah. 19 MR. NADELHAFT: Your Honor, I would 20 just have to look to make -- Your Honor, I'm 21 generally okay with it, but just I'd have to -- 22 it's 123 pages and then there's certain</p>

<p>1105</p> <p>1 redactions. I just would need to see what was 2 redacted. 3 THE COURT: Right. 4 MR. NADELHAFT: I'm generally okay 5 with -- 6 THE COURT: So I'll enter it with the 7 reservation for redactions that need to be made. 8 We can do that. 9 MR. NADELHAFT: Thank you, Your Honor. 10 THE COURT: All right. We can do that. 11 40. 12 MR. NADELHAFT: So I don't know if 13 they're thinking of publishing it, but I would ask 14 that they not publish it. Let the video play, as 15 he testifies to it, and then we can discuss -- 16 THE COURT: Is that okay? 17 MR. MONIZ: Given the lack of agreement 18 on the redactions, Your Honor, we think that's 19 fair. 20 THE COURT: Okay. We can do that. 21 MR. NADELHAFT: Thank you. 22</p>	<p>1107</p> <p>1 accurate? 2 A Yes. 3 Q Oh, I'm sorry. Let's go back up. 4 So the 6/13/14, that is your notes? 5 A Correct. 6 Q Okay. And it says "Met with patient in 7 his apartment. Patient continued to be pleasant 8 and cooperative. He stated that he initially 9 started taking opiates after some dental work and 10 became dependent on them." 11 Do you recall that conversation with 12 Mr. Depp? 13 A Yes. Those are my notes. 14 Q Okay. And it's also accurate that the 15 patient is fearful of coming off of opiates but 16 knows what he needs to do? 17 A Yes. That reflects the conversation I 18 had. 19 Q Okay. And that "Patient also expressed 20 in emotional trauma which causes him depression 21 and anxiety"? 22 A Also true.</p>
<p>1106</p> <p>1 BY MR. NADELHAFT: 2 Q And Kipper 5 is a long document. It 3 came out of your files. 4 Do you recognize this document? 5 A Yes. 6 Q What is Kipper 5? 7 A It's a progress note dated the 12th of 8 June, 2014. 9 Q So this exhibit, Kipper 5, which I will 10 refer to throughout the -- your deposition, is a 11 multipage document that is progress notes 12 throughout -- from multiple dates that came out of 13 your files. 14 Do you know who created these progress 15 notes? 16 A I created these progress notes. 17 Q It wasn't Ms. Lloyd? 18 A No, these are my notes. 19 Q Okay. All right. And you kept the 20 notes in the normal course of business? 21 A Yes. 22 Q And, again, the notes are meant to be</p>	<p>1108</p> <p>1 Q And if we go to Kipper 54 of Kipper 2 Exhibit 5, these are the medications that 3 Mr. Depp's assistant gave to you? 4 A Correct. 5 Q And going down, it's accurate where it 6 states that patient states that he currently takes 7 oxycodone 15 mg BID and oxycodone 30 mg at 8 bedtime? 9 A Yes, that's correct. 10 Q All right. I'm going to scroll down a 11 bit here. And we're going to go to Kipper 60 on 12 Kipper Exhibit 5, the notes for 6/22/14. 13 This is, again, a note that you 14 prepared? Is this a note that you prepared, 15 Dr. Kipper? 16 A I'm reviewing this. 17 Q Okay. Sorry. 18 A Yes. 19 Q Okay. And you see where it says, in 20 the middle, "Patient spoke about his difficult 21 childhood and current mood swings"? 22 A Yes.</p>

<p>1109</p> <p>1 Q What did Mr. Depp tell you about his 2 mood swings? 3 A That he had evanescent changes in his 4 mood, from good to bad. 5 Q And did he give any more information 6 about what a bad mood would be? 7 A No. It was implied that that would be 8 depression, sadness. 9 Q What about anger? 10 A That was not – I don't remember him 11 saying that. 12 Q And this note also said that he had 13 been depressed for the past three days, right 14 above where we just looked? 15 A Yes. 16 MR. NADELHAFT: And, Alex, keep this 17 up, but put up Kipper Exhibit 6, please. 18 MR. MONIZ: Your Honor, we would move 19 into evidence Depp Exhibit 42. 20 THE COURT: 42. Any objection to 42? 21 MR. MONIZ: This is another redacted 22 document, Counsel.</p>	<p>1111</p> <p>1 encounter with Mr. Depp from June 22nd to 2 June 24th of 2014. 3 Q And you keep these notes in the normal 4 course of business, correct? 5 A Yes. 6 Q And, again, they're meant to be 7 accurate, correct? 8 A Yes. 9 Q Okay. And these notes reflect that you 10 saw Mr. Depp in Boston again? 11 A Correct. 12 Q And the second paragraph, you write "We 13 discussed the need for compliance with his 14 medications. We also discussed nicotine habit and 15 agreed we would address this when we completed the 16 opiate and benzo detoxification. Mr. Depp's 17 filming will be completed around mid July and we 18 discussed the planned detoxification. Mr. Depp 19 prefers to do this in his home in the Caribbean 20 Islands. The anticipated duration is between 10 21 to 14 days, and he would be completely isolated 22 without any professional or personal obligations."</p>
<p>1110</p> <p>1 THE COURT: Mine's not redacted yet, 2 correct? 3 MR. NADELHAFT: I don't see any 4 redactions. 5 MR. MONIZ: We have a redacted copy, 6 which we can provide. Also, I believe this is 7 unobjected to on our exhibit list. 8 THE COURT: So, pending redactions? 9 MR. NADELHAFT: Well, the copy we have 10 didn't have redactions, so I'm not sure. 11 Non-redacted, I'm happy to have it included, but I 12 would need to see the redactions. 13 THE COURT: I'll reserve on redactions, 14 then, as we did with 40. So, 42 on redactions. 15 MR. MONIZ: Understood, Your Honor. 16 THE COURT: Decisionis. Okay. 17 BY MR. NADELHAFT: 18 Q Dr. Kipper, do you recognize Kipper 19 Exhibit 6? 20 A Yes. 21 Q What is it? 22 A It's a summary of the treatment and</p>	<p>1112</p> <p>1 Does this reflect the discussion you 2 had with Mr. Depp? 3 A Yes, it does. 4 Q And you also discussed that "Mr. Depp 5 understands that a nurse, Debbie Lloyd, will 6 assist me with his program and I will initiate 7 this withdrawal and supervise daily, visiting him 8 at the end of his treatment to design the next 9 steps in his therapy. And this protracted therapy 10 will include 12-step private counseling and 11 personal psychotherapy and couples therapy with 12 his fiancée Amber. Both are in agreement with 13 this plan." 14 Does that reflect the conversation you 15 had with Mr. Depp? 16 A Yes. 17 Q And was Ms. Heard at this conversation 18 as well? 19 A I don't remember, but the last sentence 20 implies that both were in agreement, so it's very 21 possible that she was, but I honestly can't 22 remember.</p>

<p style="text-align: right;">1113</p> <p>1 Q And during this detoxification, who was 2 going to be with Mr. Depp at his home in the 3 Caribbean Islands? 4 A His fiancée, Amber and the nurse, 5 Debbie Lloyd, and whatever staff members he had. 6 Q Where was Ms. Lloyd going to be each 7 day in the Caribbean Islands? 8 A She was going to be on his property in 9 a separate area. 10 Q And who was administering the 11 medications to Mr. Depp? 12 A Ms. Lloyd was giving these medications 13 and supervising that. And there were periods of 14 time at night, during the evening, early morning 15 that Ms. Heard was also helping with this. 16 Q And would there be times when Ms. Heard 17 was administering the medications to Mr. Depp 18 without Ms. Lloyd being present? 19 A Correct. Under supervision but without 20 being present. 21 Q When you say "under supervision," what 22 do you mean by that?</p>	<p style="text-align: right;">1115</p> <p>1 Q Dr. Kipper, these 18 pages came from 2 your production, and I'll represent to you that 3 there were no drug tests that I saw for 2014 or 4 2015 from Mr. Depp. 5 Do you know why that is? 6 A The only thing I can -- the answer is, 7 no. I don't understand that. We had a flood in 8 our office in 2014, October. The office above us 9 flooded our office and the basement, which is 10 where we kept certain records. But I'm not sure 11 which records relating to Mr. Depp would have been 12 involved in that. 13 But other than that, no. 14 Q Would the -- would drug tests for 15 Mr. Depp for 2014 and 2015, would those also be 16 kept electronically? 17 A No. 18 Q Who did you work with to conduct the 19 drug test of Mr. Depp? 20 A Yes, I ordered the drug test. 21 Q And what company did you work with? 22 A It appears that it's MD Lab. That's</p>
<p style="text-align: right;">1114</p> <p>1 A That Ms. Lloyd would give Ms. Heard the 2 direction on how to provide these medications. 3 Q But wasn't necessarily going to be 4 physically present there when the medications were 5 delivered to Mr. Depp, correct? 6 A Correct. 7 Q And Mr. Depp admitted to you that there 8 may be traces of cocaine since he'd been abusing 9 the substance prior to the initiation of this 10 program, correct? 11 Is this correct what you write here, in 12 Kipper 6, that Mr. Depp admitted there may be 13 traces of cocaine? 14 A Yes. 15 Q Okay. Can you -- let's just go to -- 16 back to Exhibit 5. And if we go to -- do you see 17 the note on 6/24/14 at 1200? 18 A Yes. 19 Q Is 12:00 the time? 20 A Yes. 21 Q Okay. And are these your notes again? 22 A These are my notes.</p>	<p style="text-align: right;">1116</p> <p>1 the lab we use. 2 Q And the drug tests that we do have, 3 they came from your files, correct? 4 A Correct. 5 Q And they're meant to be accurate, 6 correct? 7 A Correct. 8 Q And you would agree that drug testing 9 you took of Mr. Depp in the 2016 through 2019 10 period showed Mr. Depp testing positive for 11 cocaine, correct? 12 A Correct. 13 Q The drug test showed Mr. Depp being 14 positive for cocaine, correct? 15 A Yes, correct. 16 Q And for THC, Mr. Depp was also positive 17 for THC, correct? 18 A Correct. 19 Q And benzo; is that correct? 20 A The answer would be yes. I'm looking 21 for benzo. The answer would be correct because he 22 was maintained on benzos, benzodiazepines.</p>

<p>1117</p> <p>1 Q How long was Mr. Depp on 2 benzodiazepine? 3 A He was on benzodiazepines pretty much 4 throughout our relationship during this period of 5 time. 6 Q Wasn't one of the objects to get him 7 off of benzodiazepines? 8 A It was. And we actually used a 9 medication to accomplish that, initially. But he 10 didn't tolerate that medication very well. Not 11 everyone does. So he was put back on his benzos. 12 Q On page 3 of Exhibit 7, what's being 13 shown here under where it starts with cocaine 14 metabolites? 15 A This is a listing of substances with 16 reference ranges. And I think if you scroll down, 17 you'll see his specific analysis related to that. 18 Q And on page 4, Robert Wells was the 19 name for Mr. Depp; is that correct? An alias, 20 correct? 21 A Yes, correct. 22 Q Okay. And this is a drug test for</p>	<p>1119</p> <p>1 to the island at any point? Were you planning to? 2 A Yes. 3 Q Was it going to be throughout 4 Mr. Depp's entire detoxification or when were you 5 planning on being at the island? 6 A I was planning to see him, and did see 7 him, towards the beginning, as we initiated 8 treatment, and towards the end, when we were 9 transitioning from that treatment into the next 10 phase of his treatment. 11 Q Now, on 8/8/14, it says "Arrived on 12 island today. Plan is for patient to continue to 13 take routine meds through tomorrow at HS. At that 14 time, he will not take his oxycodone and detox 15 medications will be initiated." 16 Do you see that? 17 A Yes. 18 Q Is that you arriving at the island or 19 Ms. Lloyd arriving at the island? 20 A That's Ms. Lloyd. 21 Q So that 8/8/14 note is her note, 22 correct?</p>
<p>1118</p> <p>1 11/21/16, correct? 2 A Yes. 3 Q And what is it showing Mr. Depp 4 positive for, what drug? 5 A Positive for cocaine, amphetamines, and 6 benzodiazepines. 7 Q Okay. And on page 5, this is a test, 8 drug test, for November 21st, 2016, correct? 9 A Correct. 10 Q Okay. And it's showing -- what drugs 11 is it showing Mr. Depp was positive for? 12 A It shows cocaine, benzodiazepine, 13 cannabinoids, and amphetamines. 14 Q And, again, you did take -- the drug 15 tests were taken of Mr. Depp in 2014 and 2015, 16 correct? 17 A Correct. 18 Q Now, you had mentioned before, and the 19 note said that the plan was for Mr. Depp to detox 20 on his island in the Bahamas; is that right? 21 A Correct. 22 Q Okay. And were you going to be going</p>	<p>1120</p> <p>1 A Correct. 2 Q Okay. So some notes are hers and some 3 of these notes are yours? 4 A These notes going forward are her 5 notes, appear to be her notes. 6 Q What type of system were you putting 7 these notes into? 8 A I don't understand your question. 9 Q Well, the notes just appear to be 10 continuous and you said some were your notes, some 11 are her notes. 12 I'm trying to understand how they got 13 together? 14 A Because I put all of his treatment 15 notes together to be in one place. 16 Q Would Ms. Load type these notes or were 17 they handwritten? 18 A She would type these notes. 19 Q And then who put them all together? 20 A I did. 21 Q Okay. You see 8/9/14, "Patient 22 expressed fears of never feeling normal without</p>

<p>1 his drugs"?</p> <p>2 Do you see that?</p> <p>3 A I see that.</p> <p>4 Q Was that -- did Mr. Depp ever express</p> <p>5 that to you?</p> <p>6 A Yes, in some form, he discussed that</p> <p>7 with me.</p> <p>8 Q Hold on one second. Sorry.</p> <p>9 Do you see, at Kipper 71, where it says</p> <p>10 "MD's flight has been canceled. Arrangements are</p> <p>11 being made for him to arrive on the island on</p> <p>12 8/12/14"?</p> <p>13 A Yes, I see that.</p> <p>14 Q Is it accurate that you arrived at</p> <p>15 Mr. Depp's island on August 12th, 2014?</p> <p>16 Is that accurate?</p> <p>17 A Yes. That's accurate.</p> <p>18 Q Okay. Did you go to assess Mr. Depp on</p> <p>19 August 15th, 2014, according to these notes?</p> <p>20 A That's correct.</p> <p>21 Q And by the way, fiancée is Ms. Heard in</p> <p>22 these notes, correct?</p>	<p>1121</p>	<p>1 uncomfortable, physically.</p> <p>2 Q Dr. Kipper, this is an email -- well,</p> <p>3 do you recognize this document?</p> <p>4 A I do.</p> <p>5 Q And what is Kipper 8?</p> <p>6 A This is an email that I sent to his</p> <p>7 sister, Christi.</p> <p>8 Q Christi Dembrowski is Mr. Depp's</p> <p>9 sister?</p> <p>10 A Correct.</p> <p>11 Q And you sent this email to</p> <p>12 Ms. Dembrowski on August 18th, at 7:54 a.m.,</p> <p>13 correct?</p> <p>14 A Correct.</p> <p>15 Q This email was shortly after you had</p> <p>16 met with Mr. Depp, in the note we just looked at,</p> <p>17 correct?</p> <p>18 Well, 7:54 Pacific, so it was sometime</p> <p>19 in the morning in the Bahamas, correct?</p> <p>20 A I guess. I don't have that calculator</p> <p>21 in front of me.</p> <p>22 Q It's either three or four hours ahead,</p>	<p>1123</p>
<p>1 A Yes.</p> <p>2 Q And patient is Mr. Depp, correct?</p> <p>3 A Correct.</p> <p>4 Q And this is at Kipper 77 on Kipper 5.</p> <p>5 "Patient is upset and irritable. MD and RN went</p> <p>6 to assess patient."</p> <p>7 Is that accurate, that you came to see</p> <p>8 Mr. Depp at 1:00 in the morning?</p> <p>9 A Yes.</p> <p>10 Q And after receiving a text from</p> <p>11 Ms. Heard?</p> <p>12 A Correct.</p> <p>13 Q And Mr. Depp, the note says he</p> <p>14 states -- he being Mr. Depp, states "He had a</p> <p>15 fight with fiancée and is questioning whether or</p> <p>16 not he can emotionally and physically handle</p> <p>17 detox."</p> <p>18 Do you recall this conversation?</p> <p>19 A I can't remember that conversation, but</p> <p>20 I do know that he was struggling at that point.</p> <p>21 Q And how was he struggling?</p> <p>22 A Again, he was frustrated, he was</p>	<p>1122</p>	<p>1 so it's either 10:54, maybe it's 11:54 in the</p> <p>2 morning, correct?</p> <p>3 A Correct. I guess that's right. I</p> <p>4 mean, I assume that's right.</p> <p>5 Q Okay. And you wrote this -- and why</p> <p>6 did you write this email to Ms. Dembrowski?</p> <p>7 A We were planning to transition back to</p> <p>8 Los Angeles. We had completed the initial phase</p> <p>9 of his detoxification, and I wanted to update her</p> <p>10 as to my impressions on how he was doing and how</p> <p>11 we would proceed going forward.</p> <p>12 Q And you wrote this to Ms. Dembrowski</p> <p>13 because you were concerned about Mr. Depp; is that</p> <p>14 correct?</p> <p>15 A I wrote this so that she was aware of</p> <p>16 where we were in the process of his treatment.</p> <p>17 Q And you wrote this after he had an</p> <p>18 incident with Ms. Heard, correct?</p> <p>19 A I did not witness the incident. I</p> <p>20 wrote this after we were called to see him because</p> <p>21 there was an alleged incident, but he clearly was</p> <p>22 uncomfortable at that time when we came to see</p>	<p>1124</p>

<p style="text-align: right;">1125</p> <p>1 him. And, again, we were getting ready to 2 transition off of the island and I wanted Christi 3 to have a clear understanding of where we were at 4 that time. 5 MR. NADELHAFT: Can we pause? 6 Q And then at 12:30 -- 7 MR. NADELHAFT: Thank you. I was going 8 to move for the admission of Defendant's 9 Exhibit 268. 10 THE COURT: 268. 11 MR. MONIZ: And, Your Honor, we're 12 going to have a substantial hearsay and 13 speculation objection to this exhibit. This is a 14 communication from Dr. Kipper to a third party. 15 It's hearsay from start to finish and not within 16 any exceptions, and the fact that it contains 17 speculation. 18 THE COURT: Okay. 19 MR. NADELHAFT: I think there are 20 certain hearsay in the first paragraph and in the 21 third, on the second page. But the rest of it is 22 Dr. Kipper's impressions of Mr. Depp.</p>	<p style="text-align: right;">1127</p> <p>1 Q Do you recall Mr. Depp telling you 2 that? 3 A Yes. 4 Q And do you recall Mr. Depp saying that 5 there was tension between him and Ms. Heard? 6 A Yes. 7 Q Was the plan for Ms. Heard to take a 8 few days for herself? 9 A Yes. 10 Q And Mr. Depp wanted -- is it true that 11 Mr. Depp wanted to stop taking all the medications 12 you were providing him? 13 A Yes. That's reflected in this note. 14 Q Now, you mentioned you had -- you did 15 text with Mr. Depp on occasion, correct? 16 A I believe so, but I really can't 17 remember any specific time or message that I sent 18 to him. 19 Q Dr. Kipper, Mr. Depp has produced a 20 number of texts in this litigation between you and 21 him, and they're in this chart here. We're not 22 going to go through all of them, I promise you.</p>
<p style="text-align: right;">1126</p> <p>1 MR. MONIZ: It's not a statement 2 offered for the truth, Your Honor. It's hearsay. 3 THE COURT: I'm going to sustain as to 4 hearsay. 5 MR. NADELHAFT: Thank you, Your Honor. 6 THE COURT: Uh-huh. 7 BY MR. NADELHAFT: 8 Q You and Ms. Lloyd met with Mr. Depp? 9 A Yes. According to these notes, yes. 10 Q Okay. And do you know, is this now in 11 the Bahamas or back in Los Angeles? 12 A I need to go back to the date, not the 13 time. 14 Can you scroll up? Thank you. 15 Q 8/20/14. 16 A And I'm just looking at my calendar. 17 Yes, we were now back in Los Angeles. 18 Q And in the notes on 12:30 on 19 August 20th, "Mr. Depp stated he was done with the 20 process and no longer wanted MD and RN services." 21 Do you see that? 22 A Yes.</p>	<p style="text-align: right;">1128</p> <p>1 But I want to ask you about a few of them. And 2 we'll do this kind of throughout the deposition. 3 And on 8/21/2014, it says Dr. David 4 Kipper, this 310 phone number. 5 Was that your phone number at the time? 6 A Yes. 7 Q Okay. And this is a text from you that 8 says -- to Mr. Depp that says "Glad you're better 9 today. Respect you as much as I love you. You're 10 impossible not to love, but an easier job not to 11 respect. You're making my job a pleasure, an 12 honor, and a few sleepless nights. Stop firing 13 me, I know what I'm doing." 14 Do you recall sending that text to 15 Mr. Depp? 16 A Yes. 17 Q Okay. How long had you been working 18 with Mr. Depp at this point, as of August 21st, 19 2014? 20 A And can you define "working with him"? 21 Are you talking about specifically the detox or 22 are you talking about our initial meeting?</p>

<p>1129</p> <p>1 Q Even if we go with the initial meeting, 2 how many months has that been? 3 MR. NADELHAFT: Your Honor, one second. 4 Your Honor, as I mentioned in the deposition, 5 Defendant's Exhibit 1063 is a long list of text 6 messages between Dr. Kipper and Mr. Depp, a number 7 of which are going to be testified to today or 8 Monday, and I would just ask that the ones that 9 they testify to, we would provide in a redacted 10 form, which would just be just the texts that 11 they're testifying to, and it would be for a 12 number throughout. I can get up each time, but I 13 was hoping I wouldn't have to do that. 14 MR. MONIZ: Your Honor, I think we're 15 going to have to maintain a hearsay objection. 16 It's a text-by-text issue, whether it falls within 17 any exception. So we're not going to be able to 18 agree that the entire document comes in. It's 19 possible that some may come in, but I think that's 20 something that maybe needs to be worked out 21 between counsel afterwards. 22 THE COURT: He's still going to testify</p>	<p>1131</p> <p>1 come and visit with him and where he didn't want 2 to proceed. And then, again, at the end of that 3 visit, he was back on board. 4 Q Okay. Now, on August 24th, 2014, it 5 shows a text, when it shows him, that's Mr. Depp, 6 to you, David Kipper. And Mr. Depp wrote "Forgot 7 to tell you, had a hopefully very positive and 8 free-of-ego squawk with Amber last night that went 9 very well... And then I shot a few Negroes in a 10 club on Sunset Boulevard. So far, so good..." 11 Do you recall this text from Mr. Depp? 12 A No. 13 Q Was that Mr. Depp's typical language? 14 A Again, I don't recall this specific 15 email. So that may be -- that may have been an 16 attempt at humor? 17 Q Dr. Kipper, Kipper 10 is an -- do you 18 recognize this document? 19 A No. But I'm looking at it. 20 Q Let me ask you this: Do you recall if 21 arrowsarc@icloud.com was Ms. Heard's email 22 address?</p>
<p>1130</p> <p>1 to it because -- 2 MR. MONIZ: Understood, Your Honor. 3 The testimony comes in. That doesn't mean the 4 document itself is admissible. 5 THE COURT: I'll reserve on 1063, and 6 we'll figure out redactions. 7 MR. NADELHAFT: Thank you, Your Honor. 8 A So about four months. 9 Q Okay. And you write "Stop firing me." 10 In that four months, how many times had 11 Mr. Depp tried to fire you? 12 A That was -- I believe that was the 13 first time. And, again, this was in reference to 14 him not wanting to proceed and not wanting our 15 help. This is actually -- I'm sorry, this was the 16 second time. Because the first time was on the 17 island, just as we were getting ready to leave. 18 He did not want to proceed. He didn't think he 19 could do it. That changed after a conversation. 20 He was back on board. And this came from -- I 21 think followed that incident that you -- we just 22 referred to in the notes, when we were asked to</p>	<p>1132</p> <p>1 A I assume that by looking at this 2 document. 3 Q Exhibit 5, Kipper 101, at 9/22/14, at 4 1:25, you see it says "RN received text from 5 patient stating that he been in an argument with 6 fiancée she had a 'nasty freak out' and would like 7 nurse to give him some 'fucking knock out yum 8 yum.' RN instructed the patient to take prn 9 Neurontin 300 mg prn and Seroquel 50 mg, and that 10 RN was on her way." 11 Do you see that? 12 A Yes. 13 Q And this is a note from Ms. Lloyd? 14 A Correct. 15 Q Okay. And then it says, at 3:30, "Upon 16 arriving at the home, patient was sitting in 17 kitchen with scraped and bloody knuckles on R 18 hand," meaning his right hand, correct? 19 A Correct. 20 Q "Patient stated he punched whiteboard 21 in kitchen after fight. Patient stated he had 22 been texting his friend explaining why he didn't</p>

Transcript of Jury Trial - Day 4
Conducted on April 14, 2022

64 (1133 to
1136)

<p>1133</p> <p>1 show up to play music and fiancée was upset he was 2 not giving her enough support and the fight 3 escalated from there. Called the MD at 1:45 and 4 instructed to give a stat order of Ambien 10 mg to 5 help patient get to sleep as he has an early 6 workday." 7 Do you recall Ms. Lloyd telling you 8 about her visiting Mr. Depp and him having bloody 9 knuckles and a scraped hand? 10 A Specifics – I'm reading the note 11 you're reading, and, yes, I remember there was an 12 incident. 13 Q And an incident where Mr. Depp had 14 scraped and bloody knuckles on his hand? 15 A As indicated in the note, yes. I did 16 not see bloody knuckles. I did not see a punched 17 board. This was a communication that I received 18 through the notes from Ms. Lloyd. 19 Q And do you recall if you had -- it does 20 say you were called. Do you recall if you had a 21 conversation with Ms. Lloyd about it? 22 A Yes. I recall having spoken about</p>	<p>1135</p> <p>1 time," is that an increase of his Xanax that he 2 was to receive? 3 A Yes. 4 Q And you see at 10/15 at 6:45, it says 5 "Patient awake and states he slept from 2200 to 6 4:30. Patient continues to be agitated about work 7 and verbalizing having desires to escape with 8 drugs." 9 Do you recall seeing this note? 10 A Yes. 11 Q And do you recall Ms. Lloyd telling you 12 this about Mr. Depp? 13 A I don't remember if she told me that he 14 wanted to use, but I do remember her telling me 15 that he was upset. 16 Q And is that reflected in the note of 17 8:45, "MD informed of patient's state of mind and 18 continued agitated. He is on his way to assess 19 patient"? 20 A Can you – 21 Q Is this accurate? 22 A Can you show me that note?</p>
<p>1134</p> <p>1 there had been an incident. I don't recall the 2 specifics of that conversation. 3 Q Okay. On Kipper 5 at 10 -- the date of 4 10/14, let me show you there, which is on Kipper 5 110 of Kipper 5, and then going down to 1930, it 6 says "Patient finished filming extremely agitated 7 leaving the set. Patient kicked in the door of 8 his trailer and refused to speak to director. 9 Patient was verbally aggressive to another person 10 on the set for no apparent reason. Per MD, 11 patient is to take Xanax, 2 mg, to reduce his 12 agitation at this time." 13 Do you recall that, Dr. Kipper? 14 A I do remember this, this entry, yes. 15 Q Okay. And you remember being told that 16 Mr. Depp kicked in a door of his trailer and 17 refused to speak to his director, correct? 18 A I don't remember the specifics, but I 19 do remember there was some disagreement between 20 Mr. Depp and the director. 21 Q And where it says "Per MD, patient is 22 to take Xanax 2 mg to reduce his agitation at this</p>	<p>1136</p> <p>1 Q Yeah, it's right under. It's right 2 here, 8:45. 3 A Oh, okay. 4 Q The note's accurate, that "MD informed 5 of patient's state of mind and continued agitated. 6 He is on the way to assess patient"? 7 A Yes. 8 Q And then at 12:30, says "Patient had 9 fallen asleep and is now awake, talking with MD. 10 It has been decided patient is under too much 11 stress as it would be best for him to stay home 12 and rest today." 13 Do you see that? 14 A Yes. 15 Q Do you recall having a conversation 16 with Mr. Depp about his stress? 17 A Yes, I do. 18 Q Do you recall anything that Mr. Depp 19 told you? 20 You can answer. 21 A I remember he was very upset. I don't 22 remember the specifics of that conversation, but I</p>

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<p>1137</p> <p>1 remember he was upset. 2 Q And how was Mr. Depp displaying his -- 3 that he was very upset? 4 A He expressed himself very well, that he 5 and the director had some misunderstanding and 6 that he was upset about it. 7 Q Was Mr. Depp yelling? 8 A No. 9 Q Was he doing anything to display his 10 being upset, other than just words? 11 A Just his words. 12 Q You don't doubt the accuracy of this 13 note, though, do you? 14 A I can say that the note was written, 15 and I believe it was good reporting. 16 Q Okay. 17 A I trust that my nurses, that they would 18 report what they were told. 19 Not for the opiates. 20 Q Not for the opiate, is that what you 21 said? 22 A Correct.</p>	<p>1139</p> <p>1 A No, I don't. But clearly I see that I 2 received that text. 3 Q Okay. 4 MR. NADELHAFT: Alex, can you put up 5 Kipper 13, please. 6 Q Do you recognize, Dr. Kipper, this 7 email chain between you and Connell Cowan? 8 A I don't remember it, but I'm refreshing 9 myself with what you're showing me. 10 Q Okay. Who is Connell Cowan? 11 A He's a psychologist that I had referred 12 Amber to see. 13 Q Is there any -- Dr. Kipper, are there 14 any ethical rules to report the violence, if you 15 were to be told of violence? 16 A If I were to see the violence, I would 17 be obligated to -- I would be obligated to make 18 some reporting. I never saw any violence. 19 Q And you didn't report either Mr. Depp 20 or Ms. Heard, correct? Because you didn't see -- 21 your testimony is you didn't see any violence 22 between -- from Mr. Depp to Ms. Heard or Ms. Heard</p>
<p>1138</p> <p>1 Q Positive for cocaine, for instance? 2 A Yes. 3 Q Now, on November 17th, 2014, in 2014, 4 Mr. Depp texted you and said "I have been to see 5 Amber downtown. Yeah, yeah, interesting to say 6 the least. Wow. Anyway, I'm still away and don't 7 foresee slumber anytime soon to this broken 8 instrument of a squash atop my shoulders. I would 9 love to speak whenever you get a minute. Dear 10 David, though, honestly, if I were you, Debbie 11 and/or Erin, I would RUN for the fucking hills!!! 12 I love you, Doc... cannot thank you enough for all 13 you've done. Not only for me and my poor pack of 14 wolves and my sweet FUCKING great Mikey... these 15 are the things that remind us that life should be 16 a fucking gas. I'm waist deep in big muddy 17 here... hit me when you're drunk... it'll be far 18 less boring. Love you long time, brother... and 19 of course, the beautiful and luminous Chanelle... 20 and by now 8'6" Sam! Mucho, much... from those of 21 us who are not the others. X. JD." 22 Do you recall this text from Mr. Depp?</p>	<p>1140</p> <p>1 to Mr. Depp, correct? 2 A We never saw violence between the two 3 of them. 4 Q Okay. You heard reports but you never 5 saw it, is your testimony? 6 A Correct. 7 Q Dr. Kipper, do you recognize Kipper 14, 8 which it looks like an email between you and Alan 9 Blaustein? 10 A Yes, I recognize this. 11 Q Okay. And who is Alan Blaustein? 12 A Alan Blaustein is the psychiatrist that 13 I referred Mr. Depp to. 14 Q And when you wrote this email, as of 15 March 1st, 2015, was it your understanding that 16 Mr. Depp was in Australia at the time? 17 A Yes. 18 Q At some point, you flew to Australia; 19 is that correct, in that March 2015 time frame? 20 A Yes. 21 Q Were you always going to fly to 22 Australia to visit with Mr. Depp in March of 2015?</p>

<p>1141</p> <p>1 A No. I hadn't planned on it.</p> <p>2 Q What made you fly to Australia?</p> <p>3 A He had wanted to see me. He had just</p> <p>4 wanted to check in. He wanted – he wanted my</p> <p>5 company, at that point.</p> <p>6 Q "He" being Johnny Depp?</p> <p>7 A Yes.</p> <p>8 Q Do you know when you arrived to</p> <p>9 Australia?</p> <p>10 A No, I don't. I can't recall.</p> <p>11 Q Ms. Lloyd had gone with Mr. Depp to</p> <p>12 Australia?</p> <p>13 A Yes.</p> <p>14 Q She wasn't staying with Mr. Depp,</p> <p>15 correct?</p> <p>16 A No. No, she was not.</p> <p>17 Q Do you know how far away Ms. Lloyd was</p> <p>18 from Mr. Depp, in terms of time to get from where</p> <p>19 she was staying to Mr. Depp's house?</p> <p>20 A I would guesstimate somewhere between</p> <p>21 20 minutes to 30 minutes.</p> <p>22 Q And when you went to Australia, how far</p>	<p>1143</p> <p>1 text from Mr. Depp to you on March 7th, 2015,</p> <p>2 5:00 p.m., and it says "Hi. Fuck, man. Had</p> <p>3 another one. I cannot live like this. She's as</p> <p>4 full of shit as a Christmas goose. I'm done. NO</p> <p>5 MORE!!! The constant insults, the demeaning,</p> <p>6 belittling. Most heartbreaking smew that is only</p> <p>7 released from a malicious, evil, vindictive</p> <p>8 cunt!!!! But you know what?? FAR more hurtful</p> <p>9 than her venomous and degrading endless</p> <p>10 'educational' ranting...?? Is her hideously and</p> <p>11 purposefully hurtful tirades and goddamn shocking</p> <p>12 treatment of the man she was meant to love above.</p> <p>13 all... here's the real deal mate... her obsession</p> <p>14 with herself?? Is far more important... she is so</p> <p>15 fucking ambitious!!! She's so desperate for</p> <p>16 success and fame... that's probably why I was</p> <p>17 acquired, mate...!! Although she has HAMMERED me</p> <p>18 with what a sad old man has-been I am... Cowan has</p> <p>19 done me the most cruel of favors... I'm so very</p> <p>20 sad... I cut the top of my middle finger off..</p> <p>21 what should I do?? Except of course go to a</p> <p>22 hospital... I'm so embarrassed for jumping into</p>
<p>1142</p> <p>1 away were you from Mr. Depp, in terms of time?</p> <p>2 A Exactly the same.</p> <p>3 Q Were you and Ms. Lloyd in the same</p> <p>4 hotel?</p> <p>5 A Yes. Actually, that isn't true. I was</p> <p>6 in a hotel around the corner from where the nurses</p> <p>7 were staying.</p> <p>8 Q And in Kipper 5, at Kipper 157, you see</p> <p>9 this note for 3/7/15 at 11:30. It says "MD</p> <p>10 received a text message from client that he had</p> <p>11 been arguing with wife and that he had cut his</p> <p>12 finger. According to patient, his assistant and</p> <p>13 security were on their way to pick him up."</p> <p>14 Do you see that?</p> <p>15 A Yes.</p> <p>16 Q And whose note is this?</p> <p>17 A That would be from Ms. Lloyd.</p> <p>18 Q Okay. And is this note accurate?</p> <p>19 A Yes. It's accurate.</p> <p>20 Q Okay. Now, going back to Kipper 9.</p> <p>21 Give me a moment.</p> <p>22 At Kipper 7, at Depp 7790, it shows a</p>	<p>1144</p> <p>1 anything with her... FUCK the world!!! JD."</p> <p>2 Do you recall this text from Mr. Depp?</p> <p>3 A I don't recall the text, but I do</p> <p>4 recall him reaching out after this incident.</p> <p>5 Q Is this text a typical type of text you</p> <p>6 would receive?</p> <p>7 A In retrospect and in reading this, no.</p> <p>8 I think it reflected the fact that he was injured.</p> <p>9 Q Right. And Mr. Depp told you, in the</p> <p>10 text, "I cut the top of my middle finger off,"</p> <p>11 correct?</p> <p>12 A That's what it says.</p> <p>13 Q Okay. And then you responded, "Call</p> <p>14 me."</p> <p>15 Do you see that? That's the next text.</p> <p>16 A Yes.</p> <p>17 Q Okay.</p> <p>18 A Yes.</p> <p>19 Q And did Mr. Depp call you?</p> <p>20 A I can't recall if he called me, but I</p> <p>21 know that I went to the residence.</p> <p>22 Q Okay. And did you go with Ms. Lloyd?</p>

<p>1145</p> <p>1 A Yes.</p> <p>2 Q Okay. And back to Kipper 5, at 13:00,</p> <p>3 it says, on March 7th, 2015, "Patient was having a</p> <p>4 hard time leaving the house, so security suggested</p> <p>5 the MD and RN go to the house. Patient was</p> <p>6 sitting in car ready to leave. MD assessed</p> <p>7 patient's finger and will spend more time with</p> <p>8 patient at the location he's being moved to."</p> <p>9 So did you see Mr. Depp in the house?</p> <p>10 A I saw Mr. Depp outside the house in the</p> <p>11 car.</p> <p>12 Q Okay. So this note is accurate,</p> <p>13 correct?</p> <p>14 A Yes.</p> <p>15 Q Was Mr. Depp intoxicated when you saw</p> <p>16 him?</p> <p>17 A I don't --</p> <p>18 Q Was Mr. Depp coherent?</p> <p>19 A Yes, quite.</p> <p>20 Q He was quite coherent?</p> <p>21 A Yes.</p> <p>22 Q What do you recall him saying to you?</p>	<p>1147</p> <p>1 that house.</p> <p>2 Q What rooms did you see? What rooms did</p> <p>3 you look at in the house?</p> <p>4 A I was in the kitchen, and I believe I</p> <p>5 went downstairs. I don't really remember. I</p> <p>6 saw -- it was more of the same, that things looked</p> <p>7 out of place.</p> <p>8 Q Did it look like there was painting on</p> <p>9 the wall? Someone had written things on the wall?</p> <p>10 A No. I do -- it did look, to me, like</p> <p>11 there was blood on the wall, not an actual</p> <p>12 painting.</p> <p>13 Q How long were you in the house for?</p> <p>14 A Ten minutes, 15 minutes.</p> <p>15 Q And what were you doing in the house?</p> <p>16 A I wanted to see what happened. I was</p> <p>17 trying to figure out what happened.</p> <p>18 Q Did you talk to Ms. Heard?</p> <p>19 A I did.</p> <p>20 Q What did Ms. Heard say?</p> <p>21 A Again, I can't recall specifics, other</p> <p>22 than they had a fight. And specifics beyond that,</p>
<p>1146</p> <p>1 A I don't recall the conversation,</p> <p>2 specifically, but part of his finger was missing.</p> <p>3 Q Okay. But you said he was quite</p> <p>4 coherent, so it sounds like you had a memory of</p> <p>5 what he was saying.</p> <p>6 What do you recall him saying?</p> <p>7 A I don't recall what he said. I</p> <p>8 remember that he was very clear in speaking to me.</p> <p>9 Q Okay. Other than his finger, what did</p> <p>10 he look like?</p> <p>11 A He looked like someone who just had</p> <p>12 part of his finger taken off.</p> <p>13 Q What did the rest of his hands and arm</p> <p>14 look like?</p> <p>15 A Nothing unusual.</p> <p>16 Q What did the house look like?</p> <p>17 A The house was a mess.</p> <p>18 Q Anything else that you can describe</p> <p>19 about the house?</p> <p>20 A There were things on the floor. There</p> <p>21 were things that had been thrown around, it looked</p> <p>22 like. There were just things were out of order in</p>	<p>1148</p> <p>1 I don't remember.</p> <p>2 Q Before seeing Mr. Depp that day, when</p> <p>3 was the -- when had you seen Mr. Depp previously?</p> <p>4 A I don't remember.</p> <p>5 Q Do you know if it was the day before?</p> <p>6 A I can't remember.</p> <p>7 Q Do you remember if this was the first</p> <p>8 time you saw Mr. Depp since your arrival at -- in</p> <p>9 Australia?</p> <p>10 A Again, I can't remember.</p> <p>11 Q Dr. Kipper, I'm showing you what's been</p> <p>12 marked as Kipper 1. And my question is, do you</p> <p>13 recognize this email?</p> <p>14 A Yes, I do.</p> <p>15 Q Okay. And it's an -- and you told</p> <p>16 Ms. Lisa Beane to please print for the chart.</p> <p>17 Do you see that at the top?</p> <p>18 A Yes.</p> <p>19 Q Okay. So that's being printed for</p> <p>20 Mr. Depp's chart; is that correct?</p> <p>21 A Correct.</p> <p>22 Q And Raja Sawhney emailed you.</p>

<p style="text-align: right;">1149</p> <p>1 Do you see that?</p> <p>2 A Yes.</p> <p>3 Q And he writes, "Thank you for your</p> <p>4 time, David. Attached is a copy of my notes for</p> <p>5 you to use as necessary, re Robert Wells."</p> <p>6 And Robert Wells is Mr. Depp, correct?</p> <p>7 A Correct.</p> <p>8 Q And this was from March 8th, 2015,</p> <p>9 correct?</p> <p>10 A Yes.</p> <p>11 Q Was it accurate that his hand -- that</p> <p>12 his heavily contaminated hand and fingers with</p> <p>13 dirt, grime and paint?</p> <p>14 MR. NADELHAFT: I was going to move for</p> <p>15 the admission of Defendant's Exhibit 370.</p> <p>16 THE COURT: 3-7-0?</p> <p>17 MR. NADELHAFT: 3-7-0, yes.</p> <p>18 MR. MONIZ: Just one moment, Your</p> <p>19 Honor.</p> <p>20 And, Your Honor, we would maintain our</p> <p>21 objections on grounds of hearsay.</p> <p>22 MR. NADELHAFT: Your Honor --</p>	<p style="text-align: right;">1151</p> <p>1 Q And when do you recall seeing this</p> <p>2 note? At the time of March 8th, 2015 or around</p> <p>3 then?</p> <p>4 A It was around then. This was the</p> <p>5 emergency room doctor that saw him, and then he</p> <p>6 gave him sort of temporary care. And then he was</p> <p>7 referred to -- Mr. Depp was referred to the other</p> <p>8 doctor that we spoke of before this, who was the</p> <p>9 surgeon, who was the hand surgeon, I believe.</p> <p>10 Q Did you talk to this doctor who wrote</p> <p>11 this note?</p> <p>12 A Yes. I was present when Mr. Depp was</p> <p>13 being examined and treated.</p> <p>14 Q And at this point, you were, as of</p> <p>15 March 14th, 2015, you were telling Mr. Depp that</p> <p>16 you weren't going to be able to treat Mr. Depp</p> <p>17 anymore; is that correct?</p> <p>18 A The purpose of this note was to make</p> <p>19 sure that he was strictly compliant with</p> <p>20 everything because he needed to have his finger</p> <p>21 reconstructed. And I wanted to be sure that he</p> <p>22 was following our guidelines for the drug</p>
<p style="text-align: right;">1150</p> <p>1 MR. MONIZ: -- and the other objections</p> <p>2 asserted in our objections to the exhibits. This</p> <p>3 is an email communication between two nonparties</p> <p>4 to this case. It's hearsay. It's not within any</p> <p>5 exception, certainly not within the medical</p> <p>6 exception, and it's not admissible.</p> <p>7 MR. NADELHAFT: I think it is in the</p> <p>8 medical exception because it's from one doctor to</p> <p>9 another doctor, the treatment of Mr. Depp's hand.</p> <p>10 THE COURT: I'll sustain the objection.</p> <p>11 MR. NADELHAFT: Thank you, Your Honor.</p> <p>12 A That's correct.</p> <p>13 Q Is there anything, other than the</p> <p>14 coherent here, that you find that's inaccurate?</p> <p>15 A No. The rest of that seems accurate.</p> <p>16 Q Okay. And when you saw Ms. Heard at</p> <p>17 the house in this March 7th, 2015 time frame, did</p> <p>18 she seem like she was on -- was she coherent?</p> <p>19 A She was coherent.</p> <p>20 Q Dr. Kipper, do you recall seeing Kipper</p> <p>21 16 from the Gold Coast University hospital?</p> <p>22 A Yes, I do.</p>	<p style="text-align: right;">1152</p> <p>1 treatment.</p> <p>2 Q Mr. Depp was not following your</p> <p>3 protocol as of March 1st, 2015, correct?</p> <p>4 A Yes. I had concerns.</p> <p>5 Q Mr. Depp was not following your</p> <p>6 protocols that you were giving him as of</p> <p>7 March 14th, 2015, correct?</p> <p>8 A Correct.</p> <p>9 Q Dr. Kipper, do you recognize Kipper 17?</p> <p>10 A Yes.</p> <p>11 Q So you were withdrawing your care for</p> <p>12 Mr. Depp at least as of March 15th, 2015, correct?</p> <p>13 A I was withdrawing my care if he did not</p> <p>14 comply.</p> <p>15 Q And as of March 15th, 2015, Doctor,</p> <p>16 Mr. Depp was not complying, correct?</p> <p>17 A Correct.</p> <p>18 Q Was Mr. Depp --</p> <p>19 MR. NADELHAFT: Can you pause it again.</p> <p>20 I'm sorry. Thank you.</p> <p>21 Move for the admission of Defendant's</p> <p>22 Exhibit 391.</p>

<p>1153</p> <p>1 MR. MONIZ: And, Your Honor, we would 2 maintain our objections on the grounds of hearsay, 3 relevance and 403. It's hearsay, not within any 4 exception. It's a communication from a third 5 party, not admission. 6 MR. NADELHAFT: It's not hearsay. It's 7 a letter from Dr. Kipper that doesn't have any 8 hearsay in it and it's -- 9 THE COURT: Well, it's hearsay because 10 it's a letter from him out of court. 11 MR. NADELHAFT: I mean, it's not 12 offered for the truth of what happened, it's 13 offered for, you know, what was occurring with 14 Mr. -- what was occurring with Mr. Depp at the 15 time of March 15th. 16 THE COURT: Well, that's the truth of 17 the matter. 18 MR. MONIZ: That's being offered for 19 the truth. 20 MR. NADELHAFT: It's offered for notice 21 of when Mr. Depp -- when Dr. Kipper was not 22 continuing care with Mr. Depp.</p>	<p>1155</p> <p>1 him and promising me compliance. 2 Q Was Mr. Depp compliant with the program 3 going forward, after March 15th, 2015? 4 A He was compliant around his surgery and 5 postoperative period. 6 Q And then he became uncompliant again? 7 A I would have to refer to my notes, but 8 I don't remember him being -- I don't remember him 9 being out of control. I remember him being, you 10 know, compliant with what we needed him to do. 11 There were times when Mr. Depp sort of 12 went underground. Some of that time was when he 13 was out of the country, he was hard to connect to. 14 But I do not recall him going off the reservation 15 as far as his drug and alcohol issues. 16 Q Do you recall him testing positive for 17 cocaine after March of 2015? 18 A I believe that -- I believe so. I 19 can't tell you specifically when. 20 Q Okay. Now, going back to Kipper 9. 21 There's a text message from Mr. Depp to you on 22 March 19th, 2015, and he says "My most sincere</p>
<p>1154</p> <p>1 THE COURT: I'll sustain the objection. 2 MR. NADELHAFT: Thanks. 3 Q Was Mr. Depp not sober and compliant as 4 of March 14th? 5 A The answer is, yes, he was not 6 compliant. And the problem at hand, no pun 7 intended, was that he was about to have surgery. 8 And for him to have surgery on a finger, he needed 9 to be strictly compliant with what his medications 10 were, what his behavior was, and I did not think 11 he was stable for surgery, and I could not clear 12 him for surgery, and that was what provoked the 13 letter. 14 Q Right. And Mr. Depp had been breaking 15 promises to remain sober, correct? 16 A Correct. 17 Q And then, did you ever stop your care 18 of Mr. Depp? 19 A There was a week, I believe, and I'm 20 fuzzy on the time frame, but there was a short 21 period of time, after sending that note, before he 22 connected back with me asking me to take care of</p>	<p>1156</p> <p>1 apologies to you, Doc. I understand your decision 2 based on my immunity to do the right thing, and I 3 truly thank you for your concern. I must 4 apologize for not having had the presence of mind 5 to respect the man who has been most kind and who 6 has done more for me than anyone ever. There was 7 no call for my spineless and base behavior toward 8 you. I honestly understand the reasons for your 9 concerns in your letter and can say to you now 10 there's no longer an issue. Thank you for 11 everything. I've chopped off my left finger as a 12 reminder I should never cut off my finger again. 13 I love you, brother. Johnny." 14 Do you recall this text from Mr. Depp? 15 A Yes. 16 Q And is this the text you recall 17 Mr. Depp was saying that he would be compliant 18 going forward? 19 A Yes. 20 Q Okay. You're basing it off of this 21 text? Was there any other conversations with 22 Mr. Depp?</p>

<p>1157</p> <p>1 A We did – I know we had a conversation, 2 at some point, around that time. 3 Q Uh-huh. 4 A That validated this message. 5 Q And going back to Kipper 5, which are 6 in the notes, and we're going to go to Kipper 167. 7 And at -- for 4/13, at 15:00, the note at the 8 bottom says "Patient is in good spirits and says 9 he's not smoked marijuana in three days. States 10 he feels the majority of his issues with his wife 11 have been from him using drugs and alcohol. 12 Patient states he'll no longer sneak/use and wants 13 clarity." 14 Do you see that note? 15 A I see that note. 16 Q Who is that note from, you or 17 Ms. Lloyd? 18 A That's from Ms. Lloyd. 19 Q Okay. Did Ms. Lloyd report this to 20 you? 21 A In this note. 22 Q Okay. And there's no reason to</p>	<p>1159</p> <p>1 A He wanted to be heard. I can't say. I 2 wasn't there. 3 Q There's a text from Mr. Depp to you on 4 April 15th, 2015, and he says "My dear brother 5 David. If there's a god, then I'm positive it's 6 you. Thank you, darling man. I'm fine. I didn't 7 know it was Debbie until I'd already thrown my 8 voice toward the door. Thought it was Steven, who 9 is no small cauldron of hot water!! I'll call Deb 10 to apologize... my boundless love and infinite 11 thanks." 12 Do you recall that he texted you and 13 called Ms. Lloyd to apologize? 14 A No, I don't recall that specifically. 15 I'm reminded by this note, but I don't recall that 16 specifically. 17 Q Now, Mr. Depp sent you a text on 18 June 28th, 2015, that says "Thank you my darling 19 Kipper. All those technical abbreviations left me 20 flummoxed and in the dark!!! Soon, soon I must 21 see you and just hang out!!! By the way... Amber 22 and been absolutely perfect for three fucking</p>
<p>1158</p> <p>1 question the accuracy of the note, correct? 2 A Correct. 3 Q Now, at Depp 168, 12:15, it says on 4 April 15th, 12:15, "Arrived to patient's home. 5 Assistant was in hallway. Informed RN that 6 patient was in a bad mood and told assistant he 7 did not need anything from him today. RN was let 8 in home by security and knocked on patient's 9 bedroom door to let him know she was there. 10 Patient screamed, 'What?' RN informed patient she 11 was just letting him know she was there and would 12 be downstairs." RN -- little more down, "RN left 13 property and informed MD of the events." 14 Do you recall Ms. Lloyd telling you 15 about these events of April 15th, 2015? 16 A Well, my memory is refreshed by looking 17 at this note, yes. 18 Q And Mr. Depp had yelled at Ms. Lloyd; 19 is that right? 20 A I'm not sure he yelled at Ms. Lloyd. I 21 think he just yelled. 22 Q Okay.</p>	<p>1160</p> <p>1 months solid!!! I've locked my monster child away 2 in a cage within and it has fucking worked!!!! 3 We're goddam best friends now!!! Amazing!!! Big 4 love to you by brother... JD." 5 Do you see that? 6 A Yes. 7 Q And what do you recall you were -- what 8 is refreshed of your memory? 9 A That, obviously, there was concern that 10 he was taking more Xanax than he should have been, 11 and I needed him to tighten that up and to go back 12 to what he was prescribed. And, also, there's a 13 reference here to the phone calls. I had asked 14 him not to respond and not to engage in these 15 phone calls because those were -- that always 16 precipitated problems between the two of them when 17 they were in a bad phase. 18 Q Phone calls between Mr. Depp and 19 Ms. Heard? 20 A Correct. 21 Q And Mr. Depp responds on July 1st, 22 2015, and says "I am and have been at peace for</p>

Transcript of Jury Trial - Day 4
Conducted on April 14, 2022

71 (1161 to
1164)

<p style="text-align: right;">1161</p> <p>1 the last three to four months. It's been amazing. 2 But she's somehow locked into this very unpleasant 3 and belittling mode in the last three days. The 4 accusations, the verbal abuse, and insults. 5 Stooping to one, the most unjust. You haven't 6 changed. You fucking desperate hypocrite. You 7 didn't put the monster away. You're full of shit 8 pathetic. You're a pathetic fraud. Man, you know 9 how hard I have worked to put that motherfucker in 10 its cage, and I did that, me. I took all those 11 other problems and rid myself of them. There's a 12 whole lot more. I won't bore you with it. The 13 Xanax takes the edge off just a little. You know 14 me, it would take more than a few to really affect 15 me. Seroquel scares me for the reasons I wore off 16 of it. If you're worried about the Xanax, 17 prescribe me something different but with more 18 potency. I don't take them all that often, just 19 when the brain is inundated with this horrible 20 badgering and half truths from my wife by the 21 WSY." I don't know if he meant by the way. 22 Do you recall this text?</p>	<p style="text-align: right;">1163</p> <p>1 A Yes. I remember clearly that he was 2 upset with Dr. Cowan at a certain point. 3 Q Do you recall this text message from 4 Mr. Depp, that I just read to you? 5 A Yes. In reading it, I do. 6 Q Okay. 7 THE COURT: All right. Do you want to 8 go ahead and pause it? Looks like a good time to 9 break, and it's 5:00. Perfect. Thank you. 10 Any objection to breaking there for the 11 weekend? 12 MR. CHEW: No, Your Honor. 13 THE COURT: All right. Ladies and 14 gentlemen, we'll pick up with testimony on Monday. 15 Since I'm not going to see you for three days, I 16 just want to reiterate the same jury instruction I 17 gave in the beginning of the case when you were 18 first empaneled. Not all of it, just some of it. 19 I just want to make sure you understand, for the 20 weekend, that you are not to read anything about 21 the case, you're not to watch anything about this 22 case, you're not to look into anything about the</p>
<p style="text-align: right;">1162</p> <p>1 A Again, I do in looking at it, yes. 2 Q And Mr. Depp, again, used the term 3 "monster," correct? 4 A Yes. 5 Q And Mr. Depp goes on in this text. He 6 says by the way, he sends another -- sorry, here's 7 my -- "By the way, Cowan should be run out of town 8 in utter shame. He's a fucking sump who's done 9 absolutely nothing but giving her the verbosity 10 that she" uses -- "that she uses ever, whatever 11 she feels like she must explain to me the 12 psychology of life!!! Ludicrous!!! Yes, sir. 13 Cowan should be shot in places no one wants to be 14 shots in!!! He's a goddam charlatan big time!!! 15 I'm not going to continue to pay the fucking yes 16 man to stare at her tits and agree with everything 17 she spews... Tell him to tell he's leaving the 18 business or something or I too will become a 19 regular client whether I'm welcome or not!! 20 Thanks, and so sorry. I lobs G you." 21 Do you recall Mr. Depp informing you 22 that he was upset with Dr. Cowan?</p>	<p style="text-align: right;">1164</p> <p>1 case. This applies to television, newspapers, 2 magazines, the Internet, and any online sites. 3 Further, you're not to read, watch or 4 listen to anything about the case on any social 5 media networking sites, such as Twitter, Facebook, 6 Instagram, Snapchat, or similar sites. 7 In addition, you must not communicate 8 with anyone about the case, whether in person, 9 over the phone, by email, text or instant 10 messaging, or by any other electronic or 11 nonelectronic means. This includes your friends, 12 family, co-workers, acquaintance, and strangers. 13 I also instruct you that you cannot do 14 any research or make any inquiries about this 15 case, whether online or any other means. What you 16 learn about this case is limited to what you learn 17 in the four walls of this courtroom when 18 proceedings are underway. 19 All right? 20 So have a good weekend, and we'll see 21 you bright and early on Monday, okay? 22 Thank you.</p>

Transcript of Jury Trial - Day 4
Conducted on April 14, 2022

72 (1165 to
1168)

<p>1165</p> <p>1 (Whereupon, the jury exited the 2 courtroom and the following proceedings took 3 place.) 4 THE COURT: All right. And for the 5 litigants, I'll see you back on Monday. 6 Please, no posting on social networking 7 sites and don't talk to the press. 8 For the attorneys, I'll see you 9 tomorrow at 10:00 a.m. for a long day. And I'm 10 sure you've been doing your homework, right, so we 11 should be able to get through a lot of deposition 12 objections, right? 13 MR. CHEW: Yes, Your Honor. 14 THE COURT: Thank you. 15 We'll see you tomorrow, then. Thank 16 you. 17 THE BAILIFF: All rise. 18 (Whereupon, the trial was recessed at 19 5:02 p.m. to reconvene at 10:00 a.m. Monday, April 20 18, 2022.) 21 22</p>	
<p>1166</p> <p>1 CERTIFICATE OF SHORTHAND REPORTER 2 I, JUDITH E. BELLINGER, RPR, CRR, the 3 court reporter before whom the foregoing hearing 4 was taken, do hereby certify that the foregoing 5 excerpt transcript is a true and correct record of 6 the proceedings; that said proceedings were taken 7 by me stenographically and thereafter reduced to 8 typewriting under my direction; and that I am 9 neither counsel for, related to, nor employed by 10 any of the parties to this case and have no 11 interest, financial or otherwise, in its outcome. 12 IN WITNESS WHEREOF, I have hereunto set 13 my hand and affixed my notarial seal this 15th day 14 of April, 2022. 15 My Commission Expires: September 30, 2024 16 17 18 <i>Judith E. Bellinger</i> 19 _____ 20 NOTARY PUBLIC IN AND FOR 21 THE COMMONWEALTH OF VIRGINIA 22</p>	