

Claim No QB-2018-006323
 IN THE HIGH COURT OF JUSTICE
 QUEEN'S BENCH DIVISION
 MEDIA AND COMMUNICATIONS LIST
 Royal Courts of Justice,
 Strand,
 London, WC2A 2LL.
 Thursday, 16th July, 2020
 Before:
 MR. JUSTICE NICOL

BETWEEN:

JOHN CHRISTOPHER DEPP II
 Claimant

-and-

(1) NEWS GROUP NEWSPAPERS LIMITED
 (2) DAN WOOTTON
 Defendants

(Computer-aided transcript of the Stenograph Notes of
 Marten Walsh Cherer Limited, 2nd Floor, Quality House,
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MR. DAVID SHERBORNE, MS. ELEANOR LAWS QC and MS. KATE WILSON
 (instructed by Schillings) appeared for the Claimant.

MS. SASHA WASS QC, MR. ADAM WOLANSKI QC and MS. CLARA HAMER
 (instructed by Simons Muirhead & Burton) appeared for
 the Defendants.

PROCEEDINGS
 (DAY 8)
 (TRANSCRIPT PREPARED WITHOUT ACCESS TO COURT BUNDLES)

1 DISCUSSION
 2 in the sum of about \$525,000.
 3 MR. JUSTICE NICOL: Payment of legal fees.
 4 MR. SHERBORNE: In the sum of, I think, \$525,000 was Mr. White's
 5 evidence. I can give your Lordship transcript references if
 6 that helps.
 7 MR. JUSTICE NICOL: Yes.
 8 MR. SHERBORNE: And the third element to the settlement was that
 9 Ms. Heard was relieved of tax liabilities.
 10 MR. JUSTICE NICOL: I remember there was discussion about
 11 relieving her of liabilities. I cannot remember whether it
 12 was said specifically to be tax, but that may not matter.
 13 MR. SHERBORNE: It may not matter, but Ms. Wass pressed Mr. White
 14 as to the amount and he said many millions of dollars, but he
 15 would work it out if that was what was wanted. As I
 16 understand it, it is that last element which Mr. White has
 17 offered to help on, which your Lordship is effectively asking
 18 us to take him up on his invitation to do so. So I just
 19 wanted to be clear, before he goes on to do it, what it is
 20 that he is being asked to do. That was my understanding.
 21 MR. JUSTICE NICOL: Right. Ms. Wass, as I recall, but I have not
 22 gone back to my notes, there were three elements of the
 23 divorce settlement, and Mr. White was offering to provide such
 24 further details as he could.
 25 MS. WASS: Yes, but, my Lord, it went slightly beyond that because

1 DISCUSSION
 2 MR. JUSTICE NICOL: Yes.
 3 MR. SHERBORNE: My Lord, can I just raise two matters very
 4 briefly, before we start the evidence.
 5 MR. JUSTICE NICOL: Yes.
 6 MR. SHERBORNE: The first is Mr. White's evidence and the divorce
 7 settlement figure. Your Lordship will recall that you were
 8 asked to make an order that Mr. White should produce
 9 Mr. Depp's accounts and your Lordship declined to do so. I am
 10 not going to rehearse the reasons for that, but there was a
 11 remaining question, and that was Mr. White's other offer, if
 12 I can put it that way, when questioned about the divorce
 13 settlement by Ms. Wass, to provide details of it. I will come
 14 back to the details in a moment.
 15 As I said when this was raised, I think on Tuesday of
 16 this week, the settlement was confidential, but the figure of
 17 \$7 million did find its way somehow into the press. Now, I am
 18 told that Mr. Depp is not going to object. We are not going
 19 to object on grounds of confidentiality and I presume
 20 Ms. Heard has already told the defendants that she does not
 21 object, but I just wanted to be clear what it was that
 22 Mr. White was offering to do.
 23 There were three elements to the settlement,
 24 your Lordship will recall. The first was the payment of
 25 \$7 million. The second was the payment of legal fees, I think

1 DISCUSSION
 2 it was suggested to Mr. White that Mr. Depp had earnings, if
 3 that is the right word, in the region of 60 million in the tax
 4 year covering the year of the marriage. He said that you have
 5 to calculate the expenses and other matters, which of course
 6 is exactly the position in this country. What I am looking
 7 for is not the terms of the divorce, because we have that at
 8 file 9, behind divider 139 ----
 9 MR. JUSTICE NICOL: Just a minute. (Pause) Yes.
 10 MS. WASS: What I am looking for is whether Mr. Depp's income
 11 could be disclosed, with the calculations of reduction
 12 separately, so that that figure can be arrived at. It is not
 13 a global figure or a global assertion by Mr. White that this
 14 was a good deal for any party or other. I do not seek his
 15 opinion. I would like the figures of the earnings and the
 16 deductions from the tax point of view of Mr. Depp's financial
 17 position between ----
 18 MR. JUSTICE NICOL: When this was debated a couple of days ago,
 19 I thought I said that I was not going to ask Mr. White to
 20 elaborate on that because that information went nowhere in the
 21 absence of expert evidence on Californian divorce law.
 22 MS. WASS: My Lord did, and if that is the end of it, then that is
 23 the end of it, but what Mr. Sherborne is offering now is no
 24 more than appears at the documents which are perhaps more
 25 reliable than Mr. White's recollection, which is the actual

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<p>1 DISCUSSION</p> <p>2 settlement, which appears ----</p> <p>3 MR. JUSTICE NICOL: If there is documentary evidence about the</p> <p>4 actual settlement then I rather agree with you, that there is</p> <p>5 no point in asking Mr. White for more, but I had not</p> <p>6 appreciated that we had the actual figures.</p> <p>7 MS. WASS: Well, that is my fault because I did not make it plain</p> <p>8 at the time. It does not seem to us that it could possibly</p> <p>9 take the matter any further other than if Mr. White were to</p> <p>10 elaborate on the actual figures which my Lord has already</p> <p>11 ruled on.</p> <p>12 MR. JUSTICE NICOL: Well, Ms. Wass, if there was a</p> <p>13 misunderstanding on my part then I apologise, but I rather</p> <p>14 agree with you, that if we have the actual figures of the</p> <p>15 divorce settlement, there is no value in asking Mr. White to</p> <p>16 give the same figures.</p> <p>17 MS. WASS: Exactly.</p> <p>18 MR. JUSTICE NICOL: All right.</p> <p>19 MR. SHERBORNE: My Lord, just to be fair both to your Lordship and</p> <p>20 Mr. White, there were two matters which Ms. Wass put to him.</p> <p>21 One was to Mr. Depp's figures, which your Lordship did rule</p> <p>22 took them nowhere, but your Lordship returned to the second</p> <p>23 matter. Just to read what you Ms. Wass put to Mr. White, she</p> <p>24 asked him this. She asked him about the legal fees and said,</p> <p>25 "What were the liabilities?" This is day 5, page 178. "What</p>	<p>1 DISCUSSION</p> <p>2 accepted that Mr. White was put to proof as to what was the</p> <p>3 level of liabilities that Ms. Heard was relieved of? As far</p> <p>4 as I am aware, that level of liabilities is not stated in the</p> <p>5 settlement figures. So, if Ms. Wass is putting Mr. White to</p> <p>6 proof of that, as she said in her question, then he can</p> <p>7 provide it. If she is no longer putting him to proof of that,</p> <p>8 then he can be relieved of that burden. That is really a</p> <p>9 question for Ms. Wass because she is the person who sought to</p> <p>10 put Mr. White to proof of it.</p> <p>11 MR. JUSTICE NICOL: Right.</p> <p>12 MR. SHERBORNE: Perhaps she can confirm either way.</p> <p>13 MR. JUSTICE NICOL: Ms. Wass, I am sorry we are taking time on</p> <p>14 this, but are the settlement figures that you have mentioned</p> <p>15 that are -- I think you gave a reference.</p> <p>16 MS. WASS: Yes.</p> <p>17 MR. JUSTICE NICOL: Do they include the amount of the liabilities</p> <p>18 of which Ms. Heard was relieved?</p> <p>19 MS. WASS: There is not only no mention of the figures -- and</p> <p>20 again I may not have read it carefully enough -- but there is</p> <p>21 no reference to an agreement to do that, to effectively pay</p> <p>22 off the debt.</p> <p>23 MR. JUSTICE NICOL: If that is a potential matter that is</p> <p>24 outstanding, then there may still be a value in Mr. White</p> <p>25 being asked to give such information as he is able about the</p>
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<p>1 DISCUSSION</p> <p>2 were the liabilities that she was relieved of, that is what I</p> <p>3 am asking you, what did that amount to? (A) A very</p> <p>4 substantial amount. I do not have that information available</p> <p>5 to me at this time."</p> <p>6 "Again", says Ms. Wass, so this is the second request.</p> <p>7 The first one is the one your Lordship declined on Tuesday.</p> <p>8 "Again, would you be able to provide that, subject to any</p> <p>9 legal argument that the judge in this court has to determine?</p> <p>10 (A) I could provide you with historical reconstruction and an</p> <p>11 estimation, but I think you will find that she was relieved of</p> <p>12 many millions of dollars of liabilities. (Q) Again, I am</p> <p>13 going to put you to proof on that, if I may; you understand</p> <p>14 that? (A) Fine."</p> <p>15 That is why I rose. I rose because your Lordship had</p> <p>16 said you declined or you refused the application for</p> <p>17 disclosure of financial details, but you left over the issue</p> <p>18 of the settlement figure because that was the second request</p> <p>19 that Ms. Wass made and asked Mr. White to provide and said,</p> <p>20 "I put you to proof of that."</p> <p>21 MR. JUSTICE NICOL: Well, Mr. Sherborne, Ms. Wass has said that we</p> <p>22 have the details of the financial settlement. If that is</p> <p>23 right, and if we do have all the details there, then there is</p> <p>24 no point in asking Mr. White to give the same information.</p> <p>25 MR. SHERBORNE: Well, my Lord, I understand that, but is it</p>	<p>1 DISCUSSION</p> <p>2 relief, the liabilities of which she was relieved.</p> <p>3 MS. WASS: My Lord, there may be provided it is coupled with</p> <p>4 official documentation. We are not going to accept simply a</p> <p>5 statement from Mr. White saying that Ms. Heard's debts were 20</p> <p>6 million or something along those lines. We want to see the</p> <p>7 agreement that was sanctioned by the court. If both come</p> <p>8 together, then all well and good, but partial information from</p> <p>9 a witness who we say is partial is not appropriate, we say.</p> <p>10 MR. JUSTICE NICOL: Well, I really do not want to extend further</p> <p>11 this discussion. Mr. White can provide such information as is</p> <p>12 available to him in the form of a further witness statement.</p> <p>13 I will then hear submissions as to what weight I should give</p> <p>14 to that.</p> <p>15 MS. WASS: Yes, thank you.</p> <p>16 MR. JUSTICE NICOL: All right. Yes.</p> <p>17 MR. SHERBORNE: The second matter is timetabling. I think we are</p> <p>18 just putting together a draft timetable for your Lordship's</p> <p>19 clerk, which I think has either been sent over or it is being</p> <p>20 sent over this morning, which takes into account the various</p> <p>21 revisions.</p> <p>22 We told Ms. Wass last night, so in terms of today, that</p> <p>23 Mr. Romero is going to give evidence this morning, which is</p> <p>24 the end of his night shift, as I understand it, in</p> <p>25 Los Angeles. So, he will give evidence after Mr. Bett, who is</p>

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<p>1 DISCUSSION</p> <p>2 here in London. This is going to be in a table that</p> <p>3 your Lordship or your Lordship's clerk has received or will</p> <p>4 receive very shortly.</p> <p>5 Ms. Kendall, who was meant to give evidence,</p> <p>6 your Lordship will recall, yesterday afternoon, has been moved</p> <p>7 to Friday afternoon, and we are conscious of the fact that she</p> <p>8 has already been moved. We are working around her, but we</p> <p>9 hope she should be able to give evidence on Friday afternoon,</p> <p>10 after Laura Divenere, who is being called under a subpoena by</p> <p>11 the defendants and we think is giving evidence at three</p> <p>12 o'clock. I think she has been asked -- asked may be putting</p> <p>13 it too low -- she is being compelled to attend at three</p> <p>14 o'clock for evidence by way of video link, so Ms. Kendall will</p> <p>15 give her evidence after that.</p> <p>16 Your Lordship will be pleased to hear that with the</p> <p>17 advantage of finishing early yesterday, I have had a proper</p> <p>18 opportunity now to consider the issue I flagged of what has</p> <p>19 and has not been put by the defendants to various witnesses,</p> <p>20 and in particular to Mr. Depp, and as a result, as</p> <p>21 your Lordship will see from the timetable, whatever Mr. Depp</p> <p>22 may want, we do not actually need to call Ms. Paradis, who is</p> <p>23 scheduled for later this morning, or Ms. Ryder, who had to be</p> <p>24 rescheduled, as Ms. Kendall has, from yesterday.</p> <p>25 You will recall they give evidence about Mr. Depp and</p>	<p>1 BETT</p> <p>2 MR. JOSHUA SEAN BETT, SWORN</p> <p>3 EXAMINED BY MR. SHERBORNE</p> <p>4 MR. JUSTICE NICOL: Mr. Bett, by all means do sit down, if you</p> <p>5 wish. This is a large courtroom. If you could keep your</p> <p>6 voice nice and loud, so that everybody can hear you.</p> <p>7 THE WITNESS: Yes, sir.</p> <p>8 MR. SHERBORNE: Mr. Bett, can you give your full name to the</p> <p>9 court, please.</p> <p>10 A. Joshua Sean Bett.</p> <p>11 Q. Can I ask you, if you turn to your right you should have a</p> <p>12 series of bundles, there is a dark blue one marked file 2, if</p> <p>13 you can take that, please. Mr. Bett, can you turn to file</p> <p>14 divider 40 for me, please.</p> <p>15 A. 40, sir?</p> <p>16 Q. Yes. Do you see there a document entitled "First witness of</p> <p>17 Sean Bett"?</p> <p>18 A. I do.</p> <p>19 Q. Can you turn over a few pages, until you see page D74 in the</p> <p>20 bottom right-hand corner.</p> <p>21 A. I do.</p> <p>22 Q. Do you see a signature there?</p> <p>23 A. I do.</p> <p>24 Q. Is that your signature, Mr. Bett?</p> <p>25 A. It is.</p>
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<p>1 DISCUSSION</p> <p>2 whether there is a suggestion that he had ever hit them, which</p> <p>3 has now not been put. There is no challenge at all from</p> <p>4 Ms. Wass, when Mr. Depp said in evidence he had never hit a</p> <p>5 woman in his life. Obviously Ms. Heard is the exception, and</p> <p>6 your Lordship knows what Mr. Depp says about Ms. Wass's case</p> <p>7 in relation to that; but that is now plainly the extent of the</p> <p>8 defendants' case.</p> <p>9 In such circumstances, my Lord, there is no need, we</p> <p>10 say, to reschedule these witnesses, much as it would obviously</p> <p>11 be a pleasure to have them here. Your Lordship will then see</p> <p>12 a revised timetable, which takes us through to the end of this</p> <p>13 week and hopefully through next week as well, in terms of the</p> <p>14 defendants' witnesses. My Lord, unless your Lordship wants me</p> <p>15 to outline any of the further days, Monday or Tuesday of this</p> <p>16 week, then I was just going to call Mr. Bett, who is our next</p> <p>17 witness.</p> <p>18 MR. JUSTICE NICOL: Yes, let us call Mr. Bett. I say "let us",</p> <p>19 but if you want to call Mr. Bett, by all mean do.</p> <p>20 MR. SHERBORNE: Can I call Mr. Bett, please.</p> <p>21 MR. JUSTICE NICOL: Thank you.</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>1 BETT - SHERBORNE</p> <p>2 Q. I have to ask you a couple of questions. I know there are two</p> <p>3 matters that you want to correct; is that right, in this</p> <p>4 statement?</p> <p>5 A. That is correct.</p> <p>6 Q. Can I take you, then, to paragraph 1. I think in the first</p> <p>7 sentence, you give the date that you started with the</p> <p>8 Los Angeles County Sheriff's Department, it says there 1999;</p> <p>9 is that the correct date?</p> <p>10 A. It is incorrect.</p> <p>11 Q. What should it read?</p> <p>12 A. 1990.</p> <p>13 Q. Then, secondly, can I take you to paragraph 8. As</p> <p>14 I understand it, in the last sentence of paragraph 8, you say:</p> <p>15 "I took a picture of his injury and it is at page 1 of exhibit</p> <p>16 SB1"; is that correct?</p> <p>17 A. Correct.</p> <p>18 Q. As I understand it, you did take a picture of Mr. Depp's</p> <p>19 injury, but the photograph that is exhibited to your statement</p> <p>20 is not the picture which you took; is that right?</p> <p>21 A. That is correct.</p> <p>22 Q. Can I ask you this: did you realise -- I am not sure I cannot</p> <p>23 ask it in a leading way -- did you realise that this was the</p> <p>24 wrong photograph?</p> <p>25 A. Later on I did, correct.</p>

[3] (Pages 1248 to 1251)

[Page 1252]

1 BETT - SHERBORNE
 2 Q. As you understand it, what does this photograph relate to?
 3 A. It relates to an incident that took place approximately
 4 April 21st 2016, whereas the picture that I did take was very
 5 similar to the picture that was submitted.
 6 Q. So, it s a similar photograph, but this is not the right one?
 7 A. That is correct.
 8 Q. Did you take this photograph, the one -- well, perhaps you can
 9 just look at the one in the exhibit.
 10 A. This specific photograph, I did not take.
 11 Q. You did not take. I am very grateful.
 12 MR. JUSTICE NICOL: Just a minute. (Pause) Yes.
 13 MR. SHERBORNE: Subject to those two corrections, Mr. Bett, are
 14 the contents of your witness statement true?
 15 THE WITNESS: They are.
 16 MR. SHERBORNE: I am grateful. If you wait there, Ms. Wass will
 17 have some questions for you.
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 25

[Page 1253]

1 BETT
 2 CROSS-EXAMINED BY MS. WASS
 3 Q. Mr. Bett, you worked in security for 16 years altogether, is
 4 that right, or is it now 17 since you made your statement?
 5 A. It is roughly 17.
 6 Q. You worked for Mr. Depp for coming up to ten years?
 7 A. As of today?
 8 Q. As of today?
 9 A. As of today, it is approximately 14 years.
 10 Q. Thank you. Before that, you were an officer in the
 11 Los Angeles police department for how many years now?
 12 A. That is incorrect. I was not an officer of the Los Angeles
 13 Police Department.
 14 MR. JUSTICE NICOL: Sorry, you were not in the Los Angeles Police
 15 Department.
 16 THE WITNESS: No, sir, I was with the LA County Sheriff's
 17 Department.
 18 MS. WASS: I am sorry, that is absolutely right and that is
 19 exactly what you said in your statement. So, the County
 20 Sheriff's Department, does that have any interaction with the
 21 LAPD?
 22 A. From time to time, it mutually, if assistance is requested,
 23 search warrants, things of that nature.
 24 Q. There is a good working relationship between the LAPD and the
 25 Los Angeles County Sheriff's Department?

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1 BETT - WASS
 2 A. For the most part, yes.
 3 Q. Did you have any interaction yourself with anybody from the
 4 LAPD during the time you were an officer?
 5 A. I did from time to time.
 6 MR. JUSTICE NICOL: Sorry, you are asking whether Mr. Bett had
 7 interaction with the LAPD when he was working with the
 8 sheriff's department.
 9 MS. WASS: Yes, when he was an officer of the sheriff's
 10 department. (To the witness) I think you said from time to
 11 time?
 12 THE WITNESS: Correct.
 13 Q. All right. Presumably, as an officer of the Los Angeles
 14 County Sheriff's Department, there were occasions when you had
 15 to make statements, were there, or not?
 16 A. Yes, there were.
 17 Q. And to give evidence?
 18 A. Correct.
 19 Q. You would be aware of how important it is to give precise and
 20 accurate evidence?
 21 A. Based on recollection, that is correct.
 22 Q. Well, that was presumably what you were trained to do as an
 23 officer?
 24 A. Correct.
 25 Q. To be very careful how you gave your evidence, and to be very

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1 BETT - WASS
 2 careful to be accurate?
 3 A. Correct.
 4 Q. You, with your background, understand the difference between
 5 firsthand evidence and secondhand evidence, or what people
 6 call hearsay, and worthless tittle-tattle?
 7 A. I have never heard the term tittle-tattle, but I understand
 8 the first.
 9 Q. Do you understand what I mean by tittle-tattle?
 10 A. No.
 11 Q. Let me explain it to you. If I hear through a friend of mine
 12 that they had heard through a friend of theirs that something
 13 had happened, it is information that has come through a line
 14 of other people and to check its correctness or truthfulness
 15 is almost impossible; do you agree?
 16 A. Correct. I view that as hearsay.
 17 Q. Hearsay can be single person hearsay, the reason I called it
 18 tittle-tattle, perhaps multiple hearsay would be more
 19 accurate. You can distinguish between the value of firsthand
 20 evidence, single hearsay and multiple hearsay?
 21 A. I can.
 22 Q. Obviously the most important evidence is firsthand evidence,
 23 would you agree, as somebody with a police training?
 24 A. Correct.
 25 Q. Now, your employment with Mr. Depp was in personal protection?

[4] (Pages 1252 to 1255)

[Page 1256]

1 BETT - WASS
 2 A. It was.
 3 Q. One of your functions, also one of your duties was to drive
 4 him from A to B?
 5 A. It was.
 6 Q. So, you were not employed, let us make it plain, by Ms. Heard
 7 at any stage?
 8 A. I was not.
 9 Q. If she was with Mr. Depp, you would use your security skills
 10 to look after both of them, but you would not look after
 11 Ms. Heard when she was on her own?
 12 A. No, but I have from time to time in the time they were
 13 together.
 14 MR. JUSTICE NICOL: Just a minute. (Pause)
 15 MS. WASS: Over the time ----
 16 MR. JUSTICE NICOL: Just a minute.
 17 MS. WASS: Sorry. (Pause)
 18 MR. JUSTICE NICOL: Do I understand the position that on
 19 occasions, there were times when Ms. Heard was on her own when
 20 you were looking after her safety?
 21 THE WITNESS: Correct.
 22 MR. JUSTICE NICOL: Thank you.
 23 MS. WASS: Over the time that Ms. Heard and Mr. Depp were
 24 together, how many times would you have looked her, according
 25 to your evidence?

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1 BETT - WASS
 2 THE WITNESS: Just a few times, two to five times I would presume.
 3 Q. So your estimate is two to five times, over a period of four
 4 years?
 5 A. Correct.
 6 Q. When you were with her, did you always find her to be polite?
 7 A. She was rather polite, correct.
 8 Q. When she was driving around or travelling around without
 9 Mr. Depp, your job was not to transport her anywhere?
 10 A. No; but I have on occasions.
 11 Q. Is that the same two to five times we are talking about?
 12 A. No, it would be a little bit more than that.
 13 Q. How many times, do you think?
 14 A. Maybe 15 to 20 times.
 15 Q. Over the four-year period?
 16 A. Correct.
 17 Q. Again, she was perfectly polite when you dealt with her on her
 18 own without Mr. Depp?
 19 A. She was polite; correct.
 20 Q. Now, your job, as security, was to remain discreetly in the
 21 background, was it not?
 22 A. It was.
 23 Q. You were not part of the family, were you, you were not part
 24 of Mr. Depp and his family?
 25 A. No.

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1 BETT - WASS
 2 Q. You did not eat meals with them?
 3 A. I have eaten meals with them.
 4 Q. You may have done once or twice, but that was not the routine,
 5 was it?
 6 A. No, I have done it more than once or twice.
 7 Q. Do you think?
 8 A. Yes, when we have been out of town, on trips in hotels and so
 9 forth?
 10 Q. Is that with Mr. Depp or with Mr. Depp and Ms. Heard?
 11 A. Both.
 12 Q. When you went to their houses in the United States, it was
 13 very rare for you to go inside the premises. Do you agree?
 14 A. No, I have been inside many times.
 15 MR. JUSTICE NICOL: Just a minute.
 16 MS. WASS: I am not suggesting you have never been inside, but
 17 when, for example, you would take Mr. Depp to the Eastern
 18 Columbia Building, you would drive him there, park the car,
 19 travel up with him in the lift. The routine was Mr. Depp
 20 would go into his apartment on his own and you, or any other
 21 guard working with you, would remain elsewhere. Do you agree?
 22 A. No. I, several other guards would go inside with him, sort
 23 things out with items that he might have brought with him,
 24 check to see if anything else was needed for the evening. If
 25 things were needed, i.e. dinner, groceries, I would go and

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1 BETT - WASS
 2 take care of those matters for him.
 3 Q. Do you know what I mean by the guard shack?
 4 A. Yes.
 5 Q. Tell us what the guard shack was?
 6 A. The guard shack was an area that the security personnel stayed
 7 at his Hollywood address. It was, it had several cameras in
 8 there, CCTV cameras and so forth, where you could monitor the
 9 street, the property and so forth.
 10 Q. That was in the Sweetzer Avenue address?
 11 A. That is correct.
 12 MR. JUSTICE NICOL: Just a minute. (Pause) Yes.
 13 MS. WASS: There was also an area where the guards would remain in
 14 the Eastern Columbia Building.
 15 THE WITNESS: There was.
 16 MR. JUSTICE NICOL: Just a minute, please. (Pause) Yes.
 17 MS. WASS: Am I wrong in calling that the guard shack; did that
 18 have another name?
 19 THE WITNESS: We gave it the term "the supply room", meaning we,
 20 the guards and I, we used to call it the cubbyhole, supply
 21 room, storage area.
 22 Q. That is where, if Mr. Depp wanted to be left alone or whoever
 23 was in PH3, where he lived, where you and your fellow guard,
 24 if there was more than one of you on duty, would remain while
 25 Mr. Depp remained in his property, in his apartment. Do you

[5] (Pages 1256 to 1259)

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1 BETT - WASS
 2 agree?
 3 A. Yes.
 4 Q. Actually, it is called a, you referred to it as a cubbyhole,
 5 it was actually part of penthouse 5, was it not?
 6 A. Yes, it was connected through an outside patio.
 7 Q. All right. No doubt you have spent many an hour in that
 8 supply room over the course of the years that Mr. Depp owned
 9 that property?
 10 A. I have.
 11 Q. You said in your statement that Ms. Heard never told you that
 12 Mr. Depp would hit her; yes?
 13 A. Correct.
 14 Q. Given the relationship ---
 15 MR. JUSTICE NICOL: Sorry, Ms. Heard said, had never told ---
 16 MS. WASS: The witness that Mr. Depp had hit her, Ms. Heard.
 17 MR. JUSTICE NICOL: And you agreed with that? Mr. Bett, you
 18 agreed with that?
 19 THE WITNESS: Correct, sir.
 20 MS. WASS: The nature of your relationship was that there was no
 21 confidentiality between yourself and Ms. Heard against
 22 Mr. Depp, that would have been completely inappropriate, given
 23 the nature of your relationship with Ms. Heard. Do you agree?
 24 A. What do you mean by confidentiality, in what aspect?
 25 Q. You have made a statement saying, a woman who it is suggested

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1 BETT - WASS
 2 is the victim of an abusive relationship did not confide in
 3 you, did not reveal that to you. You were the security guard
 4 of the husband who was inflicting the domestic abuse upon her.
 5 Does that come as a surprise to you that she did not confide
 6 in you in those circumstances?
 7 A. Well, I would say I was a security guard for everybody that
 8 was around them at the moment; but that is correct, she never
 9 confided in me.
 10 Q. I am asking you whether, given the circumstances, that would
 11 be surprising?
 12 A. No, I would say it would be normal.
 13 Q. Yes. You were Mr. Depp's employee, and primarily Mr. Depp's
 14 guard, security guard?
 15 A. Correct.
 16 Q. There was absolutely no reason whatsoever for Ms. Heard to
 17 confide in you?
 18 A. Correct; but she did.
 19 MR. JUSTICE NICOL: Just a minute. (Pause)
 20 MS. WASS: On 21st May.
 21 THE WITNESS: No, not necessarily on those days. There were
 22 several times in which her and Mr. Depp would have an argument
 23 at the Sweetzer address after she stopped by in her own
 24 vehicle. And Mr. Depp would feel bad for her and he would ask
 25 me, I do not want her driving home, being upset or being

[Page 1262]

1 BETT - WASS
 2 agitated. Can you please make sure she gets home safely. So,
 3 there were many occasions in which I took her home in the
 4 vehicle, so she made it home safely, dropped her off. And
 5 during those times she would be crying, saying how much she
 6 loved Mr. Depp and she is tired of the arguing and so forth
 7 and I would tell her, well, you know, this has to stop between
 8 the two of you.
 9 Q. It is well documented that there were a lot of arguments
 10 between the two of them. You, presumably, were not there from
 11 beginning to end of any argument, were you?
 12 A. No, I was there at the majority of them, at the end. However,
 13 I was privy and present on a few occasions to where she would
 14 just get upset with him for no apparent reason, almost as if
 15 she was having a tantrum and she would walk away, go into a
 16 bedroom or go upstairs.
 17 Q. You have made it plain in your statement that really it was
 18 Ms. Heard's behaviour, or you have alleged it was Ms. Heard's
 19 behaviour which was at fault during the course of these
 20 arguments; that is the import of your statement. Do you
 21 agree?
 22 A. I agree, that is what I witnessed.
 23 Q. But what I am suggesting to you is, you were not party to the
 24 background to these arguments, or indeed in most cases the
 25 inception or the beginning of these arguments?

[Page 1263]

1 BETT - WASS
 2 A. The majority of them, no.
 3 Q. Can I just finish?
 4 A. Of course.
 5 Q. You came in at the end, you came in at the end. What do you
 6 say about that?
 7 A. On many of them, I have, yes.
 8 Q. On the majority of them, if not all of them?
 9 A. The majority, not all of them.
 10 Q. You have also alleged in your statement that Ms. Heard was
 11 somebody who behaved badly when she had been drinking?
 12 A. Correct.
 13 Q. Did you ever see her drinking?
 14 A. On many occasions.
 15 Q. Did you see Mr. Depp drinking?
 16 A. Yes, on many occasions.
 17 MR. JUSTICE NICOL: Just a minute. (Pause) Yes.
 18 MS. WASS: Did you ever see Mr. Depp drunk?
 19 THE WITNESS: I have seen him intoxicated. What do you mean by
 20 drunk, there are different varieties of being drunk?
 21 Q. Drunk, aggressive, incapable, objectionable.
 22 A. No.
 23 Q. Are you telling the truth about that?
 24 A. Yes, I am.
 25 MR. JUSTICE NICOL: Sorry, drunk, aggressive, incapable, and the

[6] (Pages 1260 to 1263)

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<p>1 BETT - WASS</p> <p>2 answer is, no?</p> <p>3 THE WITNESS: Correct, sir.</p> <p>4 MS. WASS: Have you ever seen Mr. Depp drink red wine in the</p> <p>5 morning?</p> <p>6 A. After working the night shift on a movie shoot, correct; or</p> <p>7 being up all night, I have.</p> <p>8 Q. If he is up all night, drinking a large quantity, I am talking</p> <p>9 possibly a pint, half a pint to a pint of wine in a glass of</p> <p>10 that measure; is that something you have seen?</p> <p>11 A. I have seen him drink a few glasses.</p> <p>12 Q. I am talking about the size of the glasses?</p> <p>13 A. They are average size glasses of wine.</p> <p>14 Q. I am talking about more than average, an average wine glass,</p> <p>15 is about 175 centilitres, you can get bigger ones.</p> <p>16 A. Yes.</p> <p>17 Q. Of a third of a bottle, a normal size bottle, 250 centilitres.</p> <p>18 Mr. Depp would regularly drink out of half pint or pint</p> <p>19 glasses filled with -- pint-sized glasses filled with red</p> <p>20 wine, would he not?</p> <p>21 A. Again, I do not know how big those glasses were.</p> <p>22 Q. Really? You are trying to help, are you?</p> <p>23 A. I am trying to help. You are trying to get me to converge</p> <p>24 into the metric system, centimetres and so forth, and I am</p> <p>25 telling you the glasses that I saw were your average type wine</p>	<p>1 BETT - WASS</p> <p>2 A. Correct.</p> <p>3 Q. He then went to PH3, the Eastern Columbia Building, arriving</p> <p>4 after 10, for a dinner that was being held for Ms. Heard's</p> <p>5 30th birthday; were you aware of that?</p> <p>6 A. Yes.</p> <p>7 Q. At some stage after, I suppose, I cannot give you the exact</p> <p>8 time, but after the guests had gone, you were asked to take</p> <p>9 Mr. Depp away from that building?</p> <p>10 A. I was.</p> <p>11 Q. Did you take him to Sweetzer Avenue?</p> <p>12 A. I did.</p> <p>13 MR. JUSTICE NICOL: Just a moment. (Pause) We have heard about</p> <p>14 the Eastern Columbia Building. We have heard about Sweetzer</p> <p>15 Avenue. I should say in the Eastern Columbia Building we have</p> <p>16 heard that Mr. Depp had ownership or control of several of the</p> <p>17 penthouses there. Apart from those two addresses, were you</p> <p>18 aware of any other address that Mr. Depp owned in California,</p> <p>19 in Los Angeles?</p> <p>20 THE WITNESS: I believe he owns the Woodrow Wilson address, where</p> <p>21 his children and ex-partner Vanessa reside.</p> <p>22 Q. But as far as premises that you took Mr. Depp to, it was just</p> <p>23 Sweetzer Avenue and the Eastern Columbia Building, was it?</p> <p>24 A. Yes, sir.</p> <p>25 MR. JUSTICE NICOL: Thank you.</p>
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<p>1 BETT - WASS</p> <p>2 glasses.</p> <p>3 Q. Have you ever seen Mr. Depp kick furniture when he is drunk?</p> <p>4 A. No.</p> <p>5 Q. Have you ever seen him slam cupboard doors when he is drunk?</p> <p>6 A. I should say I saw a video on TMZ, in which something was</p> <p>7 depicted as slamming and kicking cupboards; but as far as in</p> <p>8 person, no.</p> <p>9 Q. On that TMZ footage, I think he is smashing glasses of some</p> <p>10 sort, we can hear breaking glass. Do you agree?</p> <p>11 A. I do not remember that.</p> <p>12 Q. It has been played a lot in court. Unless you need to look at</p> <p>13 it, I will not ask you to look at it. Have you ever seen</p> <p>14 Mr. Depp smash glass when he is drunk?</p> <p>15 A. No.</p> <p>16 Q. Break bottles?</p> <p>17 A. No.</p> <p>18 Q. On 21st April, Ms. Heard had a small party at her flat, the</p> <p>19 flat, PH3, and you were called to drive Mr. Depp home. Were</p> <p>20 you in the shack or the cupboard when he asked for a ride back</p> <p>21 to Sweetzer Avenue?</p> <p>22 A. I was with him in a meeting in his office, where he had a</p> <p>23 meeting.</p> <p>24 Q. That was much earlier in the day, I think. We know Mr. Depp</p> <p>25 had a meeting with his accountant that early evening.</p>	<p>1 BETT - WASS</p> <p>2 MS. WASS: So, dealing with the 21st April, the night of the 21st</p> <p>3 and 22nd, were you waiting for Mr. Depp in the shack, the</p> <p>4 cubbyhole, or had you gone home?</p> <p>5 A. I was.</p> <p>6 Q. Sorry, which one?</p> <p>7 A. The cubbyhole. It is in the storage area of Penthouse 5.</p> <p>8 Q. So when Mr. Depp asked to be taken to Sweetzer Avenue, you</p> <p>9 were simply at hand; agreed?</p> <p>10 A. Correct.</p> <p>11 Q. And you did drive him home?</p> <p>12 A. I did.</p> <p>13 Q. And in support of Mr. Depp, you said in a witness statement --</p> <p>14 and, my Lord, I am looking at paragraph 8 of the witness's</p> <p>15 statement -- "On 21st April 2016, I remember driving Mr. Depp</p> <p>16 to a party for Ms. Heard's birthday"; agreed?</p> <p>17 A. Correct.</p> <p>18 Q. "He had been at a business meeting and was running late for</p> <p>19 the party. Later on in the evening I was called by Mr. Depp</p> <p>20 and drove him home to another one of his properties. He told</p> <p>21 me that Ms. Heard had sought to argue with him and had punched</p> <p>22 him causing him to sustain a visible injury. I took a picture</p> <p>23 of his injury" and it is at page 1 of your exhibit. You</p> <p>24 produce that exhibit as part of the case.</p> <p>25 A. Correct.</p>

[7] (Pages 1264 to 1267)

[Page 1268]

1 BETT - WASS
 2 Q. And with your training as a police officer, I presume you
 3 would have checked your statement very carefully before
 4 signing it?
 5 A. Correct.
 6 Q. And you would have checked that the exhibit that you produce
 7 as your own exhibit was accurate and reliable?
 8 A. I thought it was accurate. It was just an oversight on my
 9 part.
 10 Q. We know, because I think a week ago we were provided with a
 11 document which, if you go to file 9 on your right, Mr. Bett --
 12 have you got file 9?
 13 A. Yes.
 14 Q. Can you go to tab 87H(iv)?
 15 MR. JUSTICE NICOL: Just a moment, please. (Pause)
 16 THE WITNESS: My apologies, I am trying to read ----
 17 MS. WASS: Do not worry. It is difficult to navigate these
 18 things. Do you see the tabs down the side?
 19 A. I do. I see 87, that are handwritten. I am just trying to
 20 find the H.
 21 Q. There is 87H and then within H, there is even more
 22 subdivision, which it is why it is a bit tricky. It is (iv),
 23 so 87H(iv).
 24 A. Okay, I have found it.
 25 Q. You have found it. Now, that is the photograph that you

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1 BETT - WASS
 2 appended to your statement and produced as the exhibit of the
 3 photograph that you took which showed Mr. Depp's injury on the
 4 21st April?
 5 MR. JUSTICE NICOL: Sorry, is this the same photograph as ----
 6 MS. WASS: It is the photograph without the top, which is what the
 7 screenshot from the phone is.
 8 MR. JUSTICE NICOL: And do you agree that this was the photograph
 9 that you appended to your statement, exhibited to your
 10 statement?
 11 A. This is a photograph that was attached, that is correct, sir.
 12 MS. WASS: Of course, when it was attached, it was not in the form
 13 of a screenshot, which this is; do you agree?
 14 A. When I was sent the photo by one of Mr. Depp's attorneys, it
 15 did not have the time stamp above. It was just the face and
 16 it looked awful similar to the photo that I took on that said
 17 date of April 21st.
 18 Q. Just pausing there a moment, you were sent this photograph by
 19 one of Mr. Depp's attorneys?
 20 A. That is correct.
 21 Q. Was his name Adam Waldman by any chance?
 22 A. That is correct.
 23 MR. JUSTICE NICOL: Just a minute. (Pause) Yes.
 24 MS. WASS: Had you previously provided Mr. Waldman with any
 25 photographs?

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1 BETT - WASS
 2 A. At that time, no.
 3 Q. So Mr. Waldman sends you this photograph with the witness
 4 statement, is that right, which produces the photograph?
 5 A. He sent me the photograph initially and asked me if I have any
 6 recollection of it. I said, "Yes, of course, that was ----"
 7 MR. JUSTICE NICOL: Just slow down, please. "He sent me the
 8 photograph and asked if I recollected it." I think you were
 9 going to tell me what your answer was?
 10 A. My answer was, I do remember taking that photograph, which now
 11 I know is not the photograph that I took, but a photograph was
 12 taken that was very similar to this photo.
 13 MS. WASS: It was taken on your telephone, was it?
 14 A. It was taken either on my telephone or perhaps on Mr. Depp's
 15 telephone.
 16 Q. Right.
 17 MR. JUSTICE NICOL: Just a minute. (Pause) Yes.
 18 MS. WASS: I mean, if the photograph of 21st April was taken on
 19 your telephone ----
 20 MR. SHERBORNE: March.
 21 MS. WASS: March, no April. If the 21st April photograph, the
 22 birthday photograph, was taken on your telephone, there would
 23 have been no need for you to rely on Mr. Waldman to send you
 24 the exhibit that you were producing, would there?
 25 A. Well, no, the exhibit was initially sent to me, and I told him

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1 BETT - WASS
 2 I remembered taking a photograph, and I presumably thought it
 3 was that photograph. However, on my phone, because I have
 4 gone, since that timeframe, through three or four different
 5 phones, and I tried looking on my phone for any pictures that
 6 are in iCloud and so forth and I did not find it. So, after
 7 thinking, I thought I believe it was then taken with perhaps
 8 Mr. Depp's phone, but I could not find the actual photo that
 9 I took on the night of April 21st.
 10 Q. So, is the answer that if you took a photograph of Mr. Depp on
 11 21st April 2016, that photograph cannot be found?
 12 A. As of today, I do not have access to my old phones, so I tried
 13 looking once before -- it could have been an oversight where
 14 I have missed it -- but to my knowledge, that has not been
 15 found.
 16 MR. JUSTICE NICOL: Is the answer, then, to Ms. Wass's question
 17 that you cannot find that photograph?
 18 A. Correct. I cannot find it.
 19 MS. WASS: When did you first realise that the photograph that you
 20 produced in your statement, which you signed and over which
 21 you would have taken care, as an ex officer, was completely
 22 wrong? When did you realise that?
 23 A. A few days ago.
 24 Q. And is there any reason why this was only brought into the
 25 public domain today rather than as soon as you realised the

[8] (Pages 1268 to 1271)

[Page 1272]

1 BETT - WASS
 2 mistake?
 3 A. I realised the mistake a few days ago when I saw the time
 4 stamp on it.
 5 Q. Yes, and what did you do following that?
 6 A. I corresponded with one of Depp's attorneys and told him that
 7 that apparently is not the same photo that I took, that it
 8 looks very similar to.
 9 Q. And did this come about when you were sent the photograph that
 10 we are looking at in the document at page 9?
 11 A. Correct.
 12 MR. JUSTICE NICOL: Just a minute; page 9 of?
 13 MS. WASS: Sorry, file 9. I am so sorry, the photograph which we
 14 should all still have in front of us with the date of 23rd
 15 March.
 16 A. Yes, the photograph that is labelled J1.4D at the bottom.
 17 Q. Thank you very much. It is my fault for calling it tab 9.
 18 What happened, Mr. Bett, is this, was it? You were sent this
 19 document (or something similar to this) about a week ago; is
 20 that right?
 21 A. Give or take a week or perhaps three/four days. I would have
 22 to check.
 23 Q. In the last few days.
 24 A. Correct.
 25 Q. I am not going to hold you to the exact day. The document at

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1 BETT - WASS
 2 J1.4D you were sent about a week ago and you would have seen
 3 that the date on the photograph related to something
 4 completely different, an incident which the court has been
 5 told took place on 23rd March, and during which Ms. Heard
 6 admits that she punched Mr. Depp in defence of her younger
 7 sister. Do you know that background or is that ----?
 8 A. I do not know that background.
 9 Q. You do not know that background. In any event, you are sent
 10 this photograph with the dates and time stamp on it you
 11 immediately knew that it was an error?
 12 A. Correct.
 13 Q. And it is quite a serious error, is it not?
 14 A. I would say so.
 15 Q. Because this is a photograph showing a visible injury to
 16 Mr. Depp. I am going to suggest that it is the only
 17 photograph with a visible injury which he says was caused by
 18 Ms. Heard and you are using it to support evidence that you
 19 are seeking to give about an injury which you say you saw on
 20 21st April, over a year later?
 21 A. That is not true because I have taken other photos of him with
 22 injuries that I have submitted to the attorneys.
 23 Q. Let us just concentrate on the mix-up that has happened. Your
 24 evidence is, and no doubt you will swear, that you saw
 25 Mr. Depp injured on 21st April?

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1 BETT - WASS
 2 A. Correct.
 3 Q. 2016. I am going to suggest to you that he was not injured on
 4 that date. There were no signs of injury about him on that
 5 date?
 6 A. Well you are wrong, ma'am.
 7 Q. And you are contradicting that, as you are entitled to do, but
 8 had this document not come to light with the date stamp, you
 9 would have produced a document showing this injury to tell the
 10 court that you were correct, and that your evidence about this
 11 is correct, and you would say that it would support your
 12 evidence?
 13 A. I would if I had that specific photo, the injury on the 21st.
 14 I would have produced it, that is correct.
 15 MR. JUSTICE NICOL: Just a moment. (Pause) I think what is being
 16 put to you, Mr. Bett, is that but for seeing the date on the
 17 photograph that we have in bundle 9, you would have relied on
 18 this photograph to support your evidence that Mr. Depp had
 19 been injured a year later. Do you agree or not agree with
 20 that?
 21 A. Sir, I would agree that this specific photo that was attached
 22 without a time stamp looked very similar to one I remember
 23 taking on April 21st, 2016 -- very similar, with the same type
 24 of injuries.
 25 MS. WASS: The position now, Mr. Bett, is that there is no

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1 BETT - WASS
 2 evidence to support, no photographic evidence to support your
 3 assertion that Mr. Depp was injured?
 4 A. Correct. Right now, there is no photographic evidence to
 5 support April 21st.
 6 Q. Can I ask you, please, about 21st May, so about a month later,
 7 when you took Mr. Depp to the Eastern Columbia Building to see
 8 Ms. Heard, and I think you were in the company of another
 9 guard called Jerry Judge?
 10 A. That is correct, ma'am.
 11 Q. It was a day after Mr. Depp's mother had died.
 12 A. Approximately. I do not remember the exact date.
 13 Q. It is not a fact that is in dispute. Mr. Depp went over to
 14 see Ms. Heard and you were with Mr. Judge, and your
 15 understanding was that they were going to have some sort of
 16 talk, Mr. Depp and Ms. Heard; is that right?
 17 A. He was going to pick up some belongings and he was also going
 18 to speak with her.
 19 Q. Yes, and that was a conversation which was going to be quite
 20 personal, do you agree?
 21 A. I would agree.
 22 Q. The information you were given. When you arrived at the flat,
 23 you and Mr. Judge went straight to the cubbyhole or the guard
 24 shack, whatever we want to call it, and did not go into the
 25 flat first of all?

[9] (Pages 1272 to 1275)

[Page 1276]	[Page 1278]
<p>1 BETT - WASS</p> <p>2 A. That is not true. We went into the flat with them, which</p> <p>3 would have been Penthouse no. 3.</p> <p>4 Q. You have given evidence in your statement that when you</p> <p>5 arrived, you saw candles and an open bottle of wine in the</p> <p>6 flat?</p> <p>7 A. That is correct.</p> <p>8 Q. Again, I make it plain that you never went into the flat?</p> <p>9 A. I went into the flat. That is how I saw the candles and the</p> <p>10 wine.</p> <p>11 Q. There were not any candles.</p> <p>12 A. Yes, there were.</p> <p>13 MR. JUSTICE NICOL: Just a minute. What was the question about</p> <p>14 the wine?</p> <p>15 MS. WASS: I accept there was wine that you saw later that</p> <p>16 evening. You saw Mr. Depp with a bottle of wine later that</p> <p>17 evening, did you not?</p> <p>18 A. No, when I opened up the door for Mr. Depp, we went inside</p> <p>19 with them and music was playing low, candles were lit, there</p> <p>20 was a bottle of wine open, there was some wine in a glass, and</p> <p>21 I believe there might have been a glass next to that said</p> <p>22 glass that was full of wine.</p> <p>23 Q. This was at 7 o'clock in May, the end of May?</p> <p>24 A. The times are approximately 7.00 to 7.30, around that</p> <p>25 timeframe.</p>	<p>1 BETT - WASS</p> <p>2 A. Again, at any given time, Mr. Depp could have walked out. We</p> <p>3 know that she has shown a pattern of getting upset with</p> <p>4 Mr. Depp when they have tried to make up and speak, and to</p> <p>5 walk around the corner to the cubbyhole storage room area, it</p> <p>6 would be difficult to hear, which is why we stood outside the</p> <p>7 door of Penthouse 3.</p> <p>8 Q. But they could have been in there for hours?</p> <p>9 A. That is fine. It is not uncommon for us to stand for hours.</p> <p>10 Q. Your account is that they were only inside together without</p> <p>11 you and Mr. Judge for ten minutes?</p> <p>12 A. Give or take, correct.</p> <p>13 Q. Do you think you might be wrong about that?</p> <p>14 A. The timeframe is an approximate one.</p> <p>15 Q. You see, I am going to suggest that you and Mr. Depp and</p> <p>16 Mr. Judge arrived at around 7 o'clock?</p> <p>17 A. I would suggest and point out that I believe it was a little</p> <p>18 bit later than that. It was some time between 7.00 and</p> <p>19 7.30 p.m.</p> <p>20 MR. JUSTICE NICOL: Just a minute. (Pause) Yes.</p> <p>21 MS. WASS: And that Mr. Depp and you and Mr. Judge left the lift,</p> <p>22 or went down in the lift, the elevator, at about 8.30?</p> <p>23 A. I do not know the times we went into the lift.</p> <p>24 Q. What I am saying is that you arrived an hour and a half before</p> <p>25 you left?</p>
[Page 1277]	[Page 1279]
<p>1 BETT - WASS</p> <p>2 Q. It is broad daylight in Los Angeles on 21st May at 7 o'clock,</p> <p>3 is it not?</p> <p>4 A. No, the sun is starting to come down. It is getting close to</p> <p>5 dusk.</p> <p>6 Q. We will have to agree to disagree about that, but I think you</p> <p>7 do agree that there was a time when you were outside, not</p> <p>8 inside PH3?</p> <p>9 A. Yes, once Mr. Depp got settled, Mr. Judge and I exited</p> <p>10 Penthouse 3 and we went out into the hallway briefly.</p> <p>11 Q. And you said in your statement that you went to Penthouse 4</p> <p>12 briefly. Did you do that?</p> <p>13 A. We did.</p> <p>14 Q. Did you then go to the guard shack or the cupboard?</p> <p>15 A. No, we went back into the hallway where we were standing just</p> <p>16 outside of the Penthouse no. 3 door.</p> <p>17 Q. Why were you doing that?</p> <p>18 A. Waiting to see if Mr. Depp was going to come out soon, or</p> <p>19 waiting to see if there was going to be any type of argument.</p> <p>20 Q. Were you expecting some aggravation?</p> <p>21 A. From Ms. Heard, yes.</p> <p>22 Q. Did Mr. Depp give you any indication that there was going to</p> <p>23 be an argument?</p> <p>24 A. No.</p> <p>25 Q. Why did you not go back to the guard shack?</p>	<p>1 BETT - WASS</p> <p>2 A. We were not there an hour and a half.</p> <p>3 MR. JUSTICE NICOL: Just a moment. (Pause) You disagree that you</p> <p>4 were there an hour and a half?</p> <p>5 A. Correct, sir.</p> <p>6 MS. WASS: What makes you so sure?</p> <p>7 A. We were there a short period of time. It could have been</p> <p>8 between 30 and 40 minutes or 20 and 30 minutes. Again, I did</p> <p>9 not have a stopwatch going, but I know we were not there an</p> <p>10 hour and a half.</p> <p>11 Q. Do you think you could be wrong?</p> <p>12 A. No, I am not wrong.</p> <p>13 Q. I am going to you ask to look at some CCTV of the elevator,</p> <p>14 the lift; all right?</p> <p>15 A. Okay.</p> <p>16 Q. So, I am going to ask for the elevator picture of you and</p> <p>17 Mr. Depp arriving, first of all. Would my Lord bear with us</p> <p>18 as we are trying to get the picture.</p> <p>19 MR. JUSTICE NICOL: Yes. (Pause) Ms. Wass, is the point of</p> <p>20 showing this clip to the witness to establish the time that is</p> <p>21 shown on the recording?</p> <p>22 MS. WASS: Yes, it is.</p> <p>23 MR. JUSTICE NICOL: Mr. Sherborne, is there a dispute as to the</p> <p>24 time that is shown on the recording?</p> <p>25 MR. SHERBORNE: Would your Lordship permit me a moment?</p>

[10] (Pages 1276 to 1279)

[Page 1280]

1 BETT - WASS
 2 MR. JUSTICE NICOL: Of course. (Pause)
 3 MS. WASS: I think we have some results now.
 4 MR. JUSTICE NICOL: Just a moment. Although it has come up, I
 5 cannot, from this distance, see the time, which is why I still
 6 want Mr. Sherborne to answer my question. Is there a dispute,
 7 Mr. Sherborne, as to the time which is said to be on the
 8 recording?
 9 MR. SHERBORNE: I cannot dispute what is on the video.
 10 MR. JUSTICE NICOL: That is what I was asking.
 11 MR. SHERBORNE: It does not mean I accept that that is the right
 12 time.
 13 MR. JUSTICE NICOL: If you are not disputing the time that is on
 14 the CCTV ---
 15 MR. SHERBORNE: On this image.
 16 MR. JUSTICE NICOL: Yes.
 17 MR. SHERBORNE: No.
 18 MR. JUSTICE NICOL: Can you tell me what that time is?
 19 MR. SHERBORNE: Yes, my Lord. I have to say that I am in a slight
 20 difficulty myself. I think it says 21st May 2016, and 10 --
 21 sorry, 19.02.
 22 MR. JUSTICE NICOL: Sorry, 10?
 23 MS. WASS: 19.02. It is two minutes past seven.
 24 MR. SHERBORNE: Yes. Our position, so your Lordship knows, is
 25 that we do not accept that that is necessarily the right time.

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1 BETT - WASS
 2 That is what it says, but we do not accept that that is a
 3 correct reflection, given how the timings on the CCTV footage
 4 can be out up to a certain period of time.
 5 MR. JUSTICE NICOL: All right, that is helpful because that means
 6 that I do not have to squint in order to be able to try and
 7 read what the time is.
 8 MR. SHERBORNE: My Lord, yes. If that is all this is being shown
 9 for, then your Lordship is right, we do not need to.
 10 MS. WASS: Mr. Bett, you are going to see a timing on the
 11 television screen which, at this stage, says two minutes past
 12 seven. What Mr. Depp's counsel has said is exactly right,
 13 that sometimes CCTV is out, but I am going to show you the
 14 same camera when you go down. So if it is out, it is out both
 15 times, do you agree?
 16 A. I do not agree. I do not know. I do not know if it has been
 17 calibrated. You are going to show me what is on the screen
 18 ---
 19 Q. Let us have a look at it first. So we see 19.02, 7.02 in the
 20 evening of 21st May. (The footage was played to the court)
 21 That is you in the checked shirt?
 22 A. It is.
 23 Q. Mr. Judge is in a purple or navy top?
 24 MR. JUSTICE NICOL: Just a moment. (Pause) Mr. Judge was in what?
 25 MS. WASS: He is in the foreground in a bluish top and with white

[Page 1282]

1 BETT - WASS
 2 hair and Mr. Depp is wearing the cowboy hat; is that right?
 3 Is that the identification?
 4 A. That is correct.
 5 Q. Then, I do not know if we need to see the ---
 6 MR. JUSTICE NICOL: Again, I am going to ask whether Mr. Sherborne
 7 can tell me, so I do not have to squint, what the time is on
 8 the CCTV.
 9 MR. SHERBORNE: Yes, if your Lordship does not mind me turning my
 10 back.
 11 MR. JUSTICE NICOL: No, of course.
 12 MR. SHERBORNE: It is 19.02 and 37 seconds, now 38, 39 -- I am
 13 sure your Lordship does not need me to keep up a commentary on
 14 the timings, but yes.
 15 MR. JUSTICE NICOL: So that is the arrival.
 16 MR. SHERBORNE: My Lord, yes.
 17 MR. JUSTICE NICOL: Right. Then can we do the same exercise -- I
 18 am sorry to have to ask you to do this, Mr. Sherborne, but it
 19 helps my eyes -- for the exit.
 20 MR. SHERBORNE: At the moment, it is 8, 20:00 hours, 28 minutes
 21 and ---
 22 MR. JUSTICE NICOL: 20:00 hours?
 23 MR. SHERBORNE: 20:00 hours, 29 minutes and 6 seconds.
 24 MS. WASS: No, 20:29. I am sorry to interrupt.
 25 MR. SHERBORNE: Yes, 8.29 in the evening.

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1 BETT - WASS
 2 MR. JUSTICE NICOL: That is what I heard Mr. Sherborne say, 20:29.
 3 Thank you.
 4 MR. SHERBORNE: Does your Lordship need me to give you any other
 5 times?
 6 MR. JUSTICE NICOL: No, it is fine, thank you. Thank you for your
 7 assistance. Yes, Ms. Wass.
 8 MS. WASS: Thank you very much. Do you agree that there is a
 9 one-hour 29 minute or 27 minute interval before you arriving
 10 and leaving from ---
 11 A. According to the screen?
 12 Q. --- the CCTV?
 13 A. According to the TV, correct.
 14 Q. It may help you to know that Mr. Depp relies on the time of
 15 8.29 as the time that he left the building. Do you
 16 understand?
 17 A. Okay.
 18 MR. JUSTICE NICOL: Well, I am not sure that Mr. Bett is going to
 19 be able to do anything with that information.
 20 MS. WASS: All right. So, it would appear that your estimate of
 21 how long you were there is incorrect.
 22 A. They are slightly off according to the TV.
 23 Q. Slightly off? You said 30 minutes or 20 minutes. We are
 24 talking now of an hour and a half. It was a third of the time
 25 that you and Mr. Depp and Mr. Judge spent in the building.

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1 BETT - WASS
 2 A. Okay.
 3 Q. Does that surprise you, that your recollection was so
 4 incorrect?
 5 A. Well, again, this happened quite a few years ago.
 6 Q. But you made the statement?
 7 A. Based on recollection.
 8 Q. Based on your recollection. I am reminded -- thank you very
 9 much Mr. Sherborne -- that your statement was in December
 10 2019. That was the best of your recollection, was it?
 11 A. That is correct.
 12 Q. Can I help you with your recollection.
 13 A. By all means.
 14 Q. You went into the flat after you had been in the building for
 15 over an hour, so you arrive at 7ish and by the time you go
 16 into the flat, other people were in the flat, not just
 17 Mr. Depp and Ms. Heard. There was a neighbour called Rocky
 18 Pennington by the time you arrived?
 19 MR. JUSTICE NICOL: Let us take these questions one at a time. Do
 20 you agree that when you went into the flat, Ms. Pennington was
 21 there?
 22 A. Initially when we arrived or when we heard arguing?
 23 MS. WASS: When you heard arguments.
 24 A. When I heard arguing, Ms. Pennington, Ms. Heard and Mr. Depp
 25 were inside the flat.

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1 BETT - WASS
 2 Q. Exactly. To that extent, Mr. Bett, we agree. Ms. Heard was
 3 sitting on the sofa?
 4 A. No, she was standing.
 5 Q. She was crying?
 6 A. She was agitated and upset.
 7 Q. When you say she was upset, do you agree she was crying?
 8 A. I cannot remember if I saw tears on her face.
 9 Q. Did you look at her face?
 10 A. I was 20 feet away.
 11 Q. Could you see her face clearly?
 12 A. Uh-huh.
 13 Q. Was she crying?
 14 A. I could not tell.
 15 Q. Ms. Pennington was comforting her?
 16 A. Ms. Pennington was standing next to her.
 17 Q. Was she comforting her?
 18 A. What do you mean by "comforting"?
 19 Q. Was she standing close to her, possibly putting her arm around
 20 her, comforting her? Do you not know what that means, that
 21 word?
 22 A. Well, there are different degrees of comforting. She was
 23 standing next to Ms. Heard, I do not remember her putting her
 24 arms around her or anything of that nature.
 25 Q. Mr. Depp was, agreed, a distance away. But Ms. Heard said to

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1 BETT - WASS
 2 Jerry Judge, "If he hits me one more time, I'm going to call
 3 the cops."
 4 MR. JUSTICE NICOL: Just a minute. Did Ms. Heard say that?
 5 THE WITNESS: Words to the effect, correct.
 6 MR. JUSTICE NICOL: Thank you. Yes.
 7 MS. WASS: In your witness statement, at paragraph 15, you said:
 8 "I was able to see that Ms. Heard was wearing little or no
 9 makeup. Her skin was quite pale and she had no red marks or
 10 evidence of any bruises or abrasions to her face or body."
 11 A. Correct.
 12 Q. Are those your words, Mr. Bett?
 13 A. Yes, they are.
 14 Q. This statement was prepared with the assistance of
 15 Mr. Waldman, was it?
 16 A. No. It was prepared by me, when I dictated to him the night
 17 of the event. Those are my words.
 18 Q. Was it a question and answer with Mr. Waldman, or?
 19 A. It was a statement I was conveying to him.
 20 Q. You see, you are certain from the tone of that statement that
 21 there is no injury to Ms. Heard?
 22 A. Correct.
 23 Q. I asked you a moment ago whether you could see whether she was
 24 crying or not?
 25 A. Correct.

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1 BETT - WASS
 2 Q. And your answer to me was that you were 20 feet away, and it
 3 was not possible to see.
 4 A. Well, if you are 20 feet away, in my opinion, it can be
 5 difficult to see a tear on one's face, because it is clear, if
 6 there was an injury of any type would you be able to see that
 7 a little clearer.
 8 Q. Does that not rather depend on the nature of the injury?
 9 A. Well, I suppose.
 10 Q. Obviously, if she had a bleeding wound to her face, that would
 11 be obvious. But the sign of a recent slap or punch could be a
 12 quite minor mark, certainly at first, could it not?
 13 A. No, you would see immediate redness, especially with her fair
 14 skin.
 15 Q. So, you saw no immediate redness from 20 feet. Was she
 16 pointing her face at you or was her face down as she was being
 17 comforted?
 18 A. She was looking in our direction, Mr. Judge, Mr. Depp and I.
 19 Q. You say you examined her face?
 20 A. I did not examine it, I looked at it from 20 feet away.
 21 Q. From 20 feet away, for how long were you looking at her face?
 22 A. The entire time we were in the penthouse of Mr. Depp.
 23 Q. You walked into the penthouse and just stared at Ms. Heard?
 24 A. She was shouting at the top of her lungs.
 25 Q. You are standing by your evidence that she had no signs of

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1 BETT - WASS
 2 injury?
 3 A. Correct.
 4 Q. You do not even accept the possibility that she may have had
 5 signs of injury, but you did not notice them?
 6 A. Correct.
 7 Q. Then I have to suggest to you, Mr. Bett, that you are lying
 8 and that she had visible reddening to her cheek, her right
 9 cheek. It may not have been visible to you, but your
 10 certainty that it did not exist ---
 11 A. Well, ma'am, you can call me a liar 100 times. I am not
 12 lying, I am telling the truth.
 13 MR. JUSTICE NICOL: Mr. Bett, the process that we go through in
 14 court is that it is Ms. Wass's job to put to you the case of
 15 her clients. Sometimes that involves suggesting to the
 16 witness that they are not telling the truth. What I am
 17 interested in is your answers. So, if you maintain that you
 18 are telling the truth, and that it is not true that you were
 19 lying when you made your statement, then that is what I will
 20 understand as your evidence.
 21 THE WITNESS: Understood, sir.
 22 Q. So, do you agree or disagree that you were lying in your
 23 statement?
 24 A. I disagree. I was not lying.
 25 MR. JUSTICE NICOL: Thank you.

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1 BETT - WASS
 2 MS. WASS: Mr. Judge intervened in the situation, and said to
 3 Mr. Depp words to the effect of "Boss, please", and ushered
 4 Mr. Depp out of the flat?
 5 A. That is correct.
 6 Q. Mr. Depp was extremely agitated?
 7 A. He was.
 8 Q. We can see, you probably noticed on the footage of him going
 9 down in the lift, he was really very -- well, agitated. Do
 10 you agree with that?
 11 A. He was moving back and forth in the lift.
 12 Q. Presumably you have seen him like that many times before?
 13 A. No.
 14 Q. No? But Mr. Depp and you and Mr. Judge did not leave straight
 15 from PH3 to the lift downstairs, did you, you went to other
 16 apartments, and Mr. Depp went to other parts of the penthouse
 17 suites?
 18 A. I went into inside penthouse 5.
 19 Q. He went inside penthouse 5 and he -- I mean, did you do in
 20 there?
 21 A. I did, correct, we all did.
 22 Q. Mr. Depp started throwing beads and other objects that were
 23 being worked on in penthouse 5 on to the ground?
 24 A. He was not throwing anything.
 25 Q. Do you remember seeing another woman, not Ms. Pennington, you

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1 BETT - WASS
 2 probably do not know her name, but another woman there?
 3 A. I remember seeing another woman, Mr. Josh Drew, and I believe
 4 the dog, a small dog.
 5 Q. Forget the dog for a minute. There was Josh Drew, who I think
 6 you knew; he was around, was he not?
 7 A. Yes, he was living rent-free in penthouse 2 for a few years.
 8 Q. He was Ms. Pennington's fiancé?
 9 A. That is correct.
 10 Q. And then there was another woman, who I think you did not
 11 know?
 12 A. That is correct.
 13 Q. You say there was a dog, but I am not going to ask you about
 14 that. Mr. Depp was threatening people, other people, Mr. Drew
 15 and the other woman?
 16 A. That is not true. Mr. Depp told Mr. Drew and the said female
 17 to get out of his apartment.
 18 MR. JUSTICE NICOL: Just a minute. (Pause) Told them to get out
 19 of his apartment, but not threaten them?
 20 THE WITNESS: No, sir.
 21 MR. JUSTICE NICOL: Thank you.
 22 MS. WASS: When Mr. Depp left penthouse 3, he had with him a
 23 bottle of wine. Do you remember that?
 24 A. I cannot confirm if he had wine with him or not.
 25 Q. Well, he threw the wine and smashed the wine in front of the

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1 BETT - WASS
 2 door of penthouse 1?
 3 MR. JUSTICE NICOL: Just a minute. (Pause)
 4 MS. WASS: Penthouse 1 or penthouse 2.
 5 THE WITNESS: There was no smashing of anything.
 6 Q. Did you ever see wine dribbled along the wall outside
 7 penthouse -- one of the other penthouses?
 8 A. I did not.
 9 Q. Did you ever see any damage to photographs in penthouse 5?
 10 A. I did not.
 11 MR. JUSTICE NICOL: Sorry, your voice dropped then.
 12 THE WITNESS: Sorry, sir. I did not.
 13 MS. WASS: You knew police had been called that night, did you
 14 not?
 15 A. Sorry.
 16 Q. You knew that police had been called that night?
 17 A. I did.
 18 Q. How did you find that out?
 19 A. I believe the estate manager at the time, Kevin Murphy, sent
 20 me a text.
 21 Q. Yes. That night?
 22 A. Correct.
 23 Q. The name of the officers who attended, you found out their
 24 names, did you not?
 25 A. Not till they had a deposition that was made public.

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1 BETT - WASS
 2 MR. JUSTICE NICOL: Just a minute. You are saying you did not
 3 know their names until they made their depositions.
 4 THE WITNESS: That is correct, sir.
 5 MS. WASS: We have heard from one of the officers, who indicated
 6 that although her name appeared on an incident report, which
 7 is an internal police document, there was no way the public
 8 would have access to the identity of the two officers who
 9 attended that night. Do you understand what I am saying?
 10 A. I do.
 11 Q. We know that Ms. Heard knew her identity, but they were giving
 12 depositions for Mr. Depp, not for Ms. Heard. So, are you able
 13 to offer any explanation as to how the identity of the police
 14 officers was released to the Depp team in order to enable them
 15 to depose those two witnesses?
 16 A. I have no idea how those names were obtained.
 17 Q. It would have to be somebody with some sort of inside
 18 information at the LAPD. Do you agree?
 19 A. Absolutely not.
 20 Q. How else would it be available?
 21 A. Well, I can speak from experience with the sheriff's
 22 department, if there is an incident that has taken place and a
 23 police report is not filed, everything is logged on the
 24 computer, inside the vehicle. And they all have numbers, as
 25 far as incident records.

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1 BETT - WASS
 2 Q. Yes.
 3 A. From a traffic stop to going to a call for service, if
 4 somebody went into the station and asked who responded to this
 5 specific address on this specific day, who were the officers,
 6 the commander, the shift commander could release that.
 7 Q. They could release it. It is not an obligation to release
 8 that. This is on the face of it confidential internal police
 9 material, is it not?
 10 A. No. If there is a court order, where an investigator during a
 11 litigation, things of that nature, then departments in
 12 California are bound, if there is a court order, to release
 13 the information. I just cannot -- a citizen just cannot walk
 14 into a police station, unless they actually made the call
 15 themselves, and say, "Who was at my neighbour's house the
 16 other day, I want to have his address or", correction, "his
 17 name or her name".
 18 Q. I think we agree on this. A member of the public who was not
 19 the subject of any investigation cannot simply go to the
 20 police station and say "I want to know who attended
 21 penthouse 3 on the night of 21st May", you would have to have
 22 a court order?
 23 A. Correct.
 24 Q. Do you know of any application for a court order in this case?
 25 A. No.

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1 BETT - WASS
 2 Q. Your evidence is you played no part in seeking the identity of
 3 those officers?
 4 A. That is correct.
 5 Q. Despite the fact that you have historic connections with LAPD?
 6 A. Well, I have worked ----
 7 MR. JUSTICE NICOL: I think, Ms. Wass, if you are going to suggest
 8 that Mr. Bett was responsible, you should put that to him.
 9 MS. WASS: I cannot suggest he is responsible, my Lord. I have
 10 suggested that he has the means, so to speak, but I cannot say
 11 it was he who did it. I will wait to see ----
 12 MR. JUSTICE NICOL: Then, there is no need for Mr. Bett to respond
 13 to that.
 14 MS. WASS: All right. Your evidence, Mr. Bett, is that Mr. Depp
 15 is not violent and you are not violent; is that right?
 16 THE WITNESS: That is correct.
 17 Q. Do you remember a court case in 2012 involving yourself and
 18 Mr. Depp relating to a woman who was, who made a complaint
 19 that she had been assaulted at an Iggy Pop concert?
 20 A. I remember that.
 21 Q. Could you go to divider 10, please.
 22 MR. JUSTICE NICOL: Volume 10.
 23 MS. WASS: No, file 10. (To the witness) Right at the very back,
 24 there is a tab B, almost at the very end. Can you see a
 25 tab B?

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1 BETT - WASS
 2 THE WITNESS: I see it. It is a handwritten tab.
 3 Q. It may be a handwritten tab, but it should be a printout from
 4 a newspaper.
 5 A. That is correct.
 6 Q. Saying, "UC Irvine Professor can seek damages ----"
 7 MR. JUSTICE NICOL: Just a minute, did you say 10B?
 8 MS. WASS: I am told it is C. Sorry.
 9 THE WITNESS: I see it.
 10 MS. WASS: It is from the LA Times. Do you agree?
 11 A. That is correct.
 12 Q. And it is dated 2nd November 2012.
 13 A. Yes.
 14 Q. And it says: "UC Irvine Professor can seek damages from
 15 Johnny Depp in concert scuffle".
 16 A. Yes.
 17 Q. Go over the page, please: "A UC Irvine Professor who claims
 18 she was injured by Johnny Depp's bodyguards can seek punitive
 19 damage from the actor, a Los Angeles County Superior Court
 20 Judge ruled. ...(reads to the words)... according to the
 21 lawsuit." Does this sound familiar to you, this account?
 22 A. It does, but it is not factually accurate.
 23 Q. Can you go to the next tab, please, tab D, I think.
 24 MR. JUSTICE NICOL: Sorry?
 25 MS. WASS: Tab D. I have asked for C and tab D would be the next

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1 BETT - WASS
 2 one. Have you got that, Mr. Bett?
 3 THE WITNESS: I do.
 4 Q. Can we start by actually looking at the very back page of
 5 that. It should have a little 33 in the bottom.
 6 A. Okay.
 7 Q. At the top there is the name Martin D Singer?
 8 A. That is correct.
 9 Q. Do you know Marty Singer?
 10 A. I know him by name.
 11 Q. He was counsel for Mr. Depp and the Moon Investments Trusts.
 12 Mr. Singer is someone who regularly acts for Mr. Depp as a
 13 solicitor, is he not?
 14 A. At the time, correct.
 15 Q. At the time and after?
 16 A. Well, not now, but at that time.
 17 Q. At that time, and for many years after?
 18 A. Correct.
 19 Q. He is not -- sorry, he is nothing to do with this case?
 20 A. Right.
 21 Q. But he continues to be somebody from whom Mr. Depp seeks legal
 22 advice now and again, when he needs it.
 23 A. Not now, no.
 24 Q. Not now. All right. Go to the beginning of that document,
 25 please. Then, I am going to ask to you look at the pagination

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1 BETT - WASS
 2 in the middle of the bottom of each page, which is the
 3 original document pagination. Do you understand?
 4 A. Okay.
 5 Q. If you go to page 3 at the bottom, the complainant, that is
 6 the lady who claimed she had been assaulted, filed this matter
 7 on 16th April 2012 and it was amended to add the name Joshua
 8 Sean Bett; is that you?
 9 A. It is.
 10 MR. JUSTICE NICOL: Just a minute. (Pause) Yes.
 11 MS. WASS: Then, over on page 6 at the bottom, please, this is an
 12 account that is -- perhaps we can start at 5 at the bottom,
 13 because the heading is "Facts common to all counts".
 14 THE WITNESS: This is on page 6?
 15 Q. No, page 5, just so we understand what page 6 deals with, it
 16 is headed "Facts common to all counts".
 17 A. Okay, I see it.
 18 Q. Then go to 6 and look at paragraph 30, please.
 19 A. Okay.
 20 Q. It says: "Later, after the opening band started playing,
 21 defendant John Christopher Depp II, also known as Johnny Depp,
 22 his security guards and other persons in his party arrived to
 23 the VIP area as well." That is correct, is it not?
 24 A. That is correct.
 25 Q. The other security guards included you?

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1 BETT - WASS
 2 A. That is correct.
 3 Q. Could you go over to page 10, at the bottom, and go to the top
 4 of that page to paragraph 71, she describes two people as
 5 security guard 1 and security guard 2, it says: "Security
 6 guard 1 and one more other Depp security guard tugged on the
 7 handcuff attached to Doe" -- Doe is the name she was given in
 8 these proceedings, do you agree?
 9 A. That is correct.
 10 Q. "Doe's right wrist in an attempt to get her to stand up.
 11 ...(reads to the words)... on to the ground and through the
 12 Hollywood Palladium theatre." How many of Mr. Depp's guards
 13 were with him that night?
 14 A. There were two of us.
 15 Q. There were two of you. So, were you one of those that had
 16 handcuffs?
 17 A. No.
 18 MR. JUSTICE NICOL: Just a minute.
 19 MS. WASS: But you had ----
 20 MR. JUSTICE NICOL: Just a minute. (Pause) Yes.
 21 MS. WASS: You had worked at the sheriff's office, you told us
 22 that.
 23 THE WITNESS: Correct.
 24 Q. Did you ever say to this lady that you were a police officer?
 25 A. No.

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1 BETT - WASS
 2 Q. All right. Let us read on: "Security guards 1, 2 and 3
 3 repeatedly yanked the handcuff chain up towards the ceiling,
 4 causing severe injuries and trauma to Doe's wrists, arms and
 5 body. While being dragged on the floor by the handcuffs, the
 6 plaintiff's pants were removed from her torso and hips,
 7 exposing her buttocks ----"
 8 MR. JUSTICE NICOL: Ms. Wass, I have listened now to quite a
 9 number of your questions. Can you tell me where this line of
 10 questioning is going, please?
 11 MS. WASS: Mr. Bett has said that Mr. Depp was never involved in
 12 violence against women.
 13 MR. SHERBORNE: Oh, come on! My Lord, this is ridiculous.
 14 MR. JUSTICE NICOL: Now, Ms. Wass, the claim is by Mr. Depp, the
 15 claim in these proceedings is by Mr. Depp. The defence
 16 advanced on the defendants' behalf is one of truth, that
 17 Mr. Depp had indeed hit women, had hit Ms. Heard. How am
 18 I helped by investigating this completely separate incident?
 19 MS. WASS: My Lord, in my submission, I should be allowed to ask
 20 this witness what he says about it, whether he agrees with it
 21 or disagrees with it, and if he agrees with it, it may form a
 22 view as to whether his assertions ----
 23 MR. JUSTICE NICOL: Can we get to the question as to whether or
 24 not he agrees with the account that is given.
 25 MR. SHERBORNE: My Lord, can I be very clear about this. Ms. Wass

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1 BETT - WASS
 2 produced last night, late last night, documents which are
 3 eight years old, which must have been in the defendants'
 4 possession for some time, and most importantly -- Ms. Wass
 5 shakes her head -- but they are eight years old and they have
 6 come from somewhere. They are of a claim, rather like the
 7 Rocky Brooks' claim we were shown, where the grinning
 8 selfie-taking Mr. Brooks, who made a legal complaint is shown
 9 showing off the fact Mr. Depp and him are friends, even though
 10 he then later brings a claim. We are now being told that this
 11 is somehow meant to be linked to Mr. Depp, and yet it was
 12 never put to Mr. Depp in cross-examination at all. So,
 13 my Lord, with respect, this is impermissible. It is -- and
 14 I use this word advisedly -- it is a stunt, which is brought
 15 up after Mr. Depp, who was treated to four days of
 16 cross-examination by Ms. Wass, during which time she never
 17 mentioned this, and now the vehicle used for this stunt is
 18 Mr. Bett. If it is going to be suggested to Mr. Bett now that
 19 he was somehow involved in this assault, of bear-hugging this
 20 woman, and taking her mobile phone, then that is one thing.
 21 But if it is going to be suggested that Mr. Depp, through some
 22 tenuous point of Ms. Wass's, is involved in violence, then it
 23 should have been put to Mr. Depp and I do object. Because we
 24 have reached the point where Ms. Wass cannot keep doing this,
 25 which is not putting charges to people she is accusing and

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1 BETT - WASS
 2 using other witnesses as vehicles for doing so. It is no
 3 substitution, and I would submit that she should not simply be
 4 allowed to read out these documents.
 5 MR. JUSTICE NICOL: All right, Mr. Sherborne. Thank you.
 6 Ms. Wass, you can ask Mr. Bett if the allegations of the
 7 claimant in this complaint are true. It seems to me that if
 8 you had wanted to suggest that Mr. Depp had been party to that
 9 violence, that should have been put to him.
 10 MS. WASS: My Lord, I agree. May I simply, since I have been
 11 accused of ----
 12 MR. JUSTICE NICOL: No, let us get on with the cross-examination.
 13 MS. WASS: All right.
 14 MR. JUSTICE NICOL: Do you want to ask Mr. Bett whether he was
 15 involved in this violence against this woman?
 16 MS. WASS: Yes.
 17 MR. JUSTICE NICOL: All right.
 18 MS. WASS: (To the witness) The question has been asked by the
 19 learned judge in this case, do you agree that you were
 20 involved in violence against a woman, you were part of a group
 21 of security guards protecting Mr. Depp involved in violence
 22 against a woman?
 23 THE WITNESS: No. And these statements are inaccurate. It was
 24 proven through testimony of witnesses that none of this
 25 information was corroborated.

[Page 1302]

1 BETT - WASS
 2 Q. There was a confidential settlement, was there not, at the
 3 end?
 4 A. Correct.
 5 Q. Mr. Bett, the reason these documents came to light was because
 6 Mr. Singer ----
 7 MR. JUSTICE NICOL: Well now.
 8 MR. SHERBORNE: My Lord, this is a speech.
 9 MR. JUSTICE NICOL: Ms. Wass, you have put to Mr. Bett the
 10 question that I said you can put. I think really now we have
 11 to move on from this topic.
 12 MS. WASS: Finally this: Mr. Sherborne has reminded me that this
 13 is not the only incident when you have been involved in a
 14 lawsuit and have assisted Mr. Depp. There is also the ongoing
 15 litigation relating to somebody called Rocky Brooks. I think
 16 you are part of that; is that correct?
 17 THE WITNESS: There is litigation, correct.
 18 MR. JUSTICE NICOL: Just a minute. (Pause).
 19 MS. WASS: Mr. Depp has told us all about that, but it is not
 20 concluded; it is ongoing?
 21 A. Correct.
 22 MS. WASS: Thank you very much. That is all I ask of the witness.
 23 MR. JUSTICE NICOL: Yes.
 24
 25

[Page 1303]

1 BETT
 2 RE-EXAMINED BY MR. SHERBORNE
 3 MR. SHERBORNE: Mr. Bett, there is just one question. I am not
 4 going to go back over that claim brought by Ms. Eckhart and
 5 the testimony that you referred to contradicting it. Can I
 6 just ask one question about that evening, given that it was
 7 put to you? Was Mr. Depp on his own or with his children?
 8 A. His children were present.
 9 Q. Mr. Bett, just going back to the beginning of the
 10 cross-examination, I am going to just ask you a few questions,
 11 taking them in the order that Ms. Wass asked you. Just
 12 starting, you mentioned right at the beginning that your
 13 contact with Mr. Depp and Ms. Heard -- can I just ask you to
 14 look at your witness statement? Is it still in front of you?
 15 A. It is.
 16 Q. Do you see at paragraph 5?
 17 A. I do.
 18 Q. You say, "Indeed, when they were in Los Angeles, I would have
 19 been with Mr. Depp and Ms. Heard between five and seven days a
 20 week."
 21 A. Correct.
 22 Q. And during those five or seven days a week -- there are only
 23 seven days in a week, obviously -- so five or seven days a
 24 week, would you have seen them infrequently during that period
 25 of each day, or would you have seen them quite a lot each day,

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1 BETT - SHERBORNE
 2 or how much?
 3 A. Frequently. It just depends on the day and what their
 4 activities are.
 5 Q. It was then put to you by Ms. Wass that it would not have been
 6 appropriate for Ms. Heard to confide in you and you answered
 7 by saying, "But she did fact confide in me." Do you remember?
 8 A. I do.
 9 Q. You described, when you were giving examples, how Mr. Depp, at
 10 the end of an argument, would still ask you to drive Ms. Heard
 11 home because he wanted to make sure she got home safely?
 12 A. That is correct.
 13 Q. That was your answer. When you described the times when you
 14 would drive her home, you said that she would be crying
 15 sometimes and she would say she was tired of arguing. During
 16 those conversations that you had with her on those occasions,
 17 at any time did she ever say that Mr. Depp had hit her?
 18 A. No.
 19 Q. Been violent towards her?
 20 A. No, sir.
 21 Q. She was afraid of him?
 22 A. No, sir.
 23 Q. Did you see any injuries, bruises, marks, swellings and so on
 24 on her face during those conversations you had with her?
 25 A. I did not.

[Page 1305]

1 BETT - SHERBORNE
 2 Q. Ms. Wass then took you to what she herself described as "the
 3 mix-up" -- that is the phrase she used -- over the
 4 photographs. I am not going to go back over how that
 5 happened. You have explained the mistake. Can I ask you
 6 about your evidence. Now, in terms of what you saw on 21st
 7 April, you said to Ms. Wass that you saw injuries that were
 8 very similar to the ones in the photograph we now know is the
 9 March photograph?
 10 A. Correct.
 11 Q. And Ms. Wass accepted, she said, that Ms. Heard had hit ---
 12 MR. JUSTICE NICOL: March 2015.
 13 MR. SHERBORNE: My Lord, yes. Ms. Wass said it is accepted by
 14 Ms. Heard that she did hit Mr. Depp in March 2015. We have
 15 your account of 21st April and the injuries you saw. Are
 16 those the only two incidents of injuries that Ms. Heard caused
 17 to Mr. Depp that you know of?
 18 A. There was another incident in December in which he sustained
 19 injuries from Ms. Heard -- Mr. Depp.
 20 MR. JUSTICE NICOL: Just a minute. (Pause) In December. Can you
 21 help me with which year?
 22 A. That would be 2015, sir.
 23 MR. JUSTICE NICOL: Thank you.
 24 MR. SHERBORNE: Can I ask you to take bundle 6. It is the red
 25 bundle to your right.

[Page 1306]

1 BETT - SHERBORNE
 2 MR. JUSTICE NICOL: Can I put 7 away?
 3 MR. SHERBORNE: My Lord, yes, you can.
 4 MR. JUSTICE NICOL: No, sorry, it was ----
 5 MR. SHERBORNE: I was not sure why your Lordship had 7.
 6 MR. JUSTICE NICOL: 6?
 7 MR. SHERBORNE: 6, please, my Lord, yes.
 8 MR. JUSTICE NICOL: Yes.
 9 MR. SHERBORNE: Can I just ask you to turn to divider 148.
 10 A. Okay.
 11 Q. 148C.
 12 MR. JUSTICE NICOL: There are separate tabs with the letters.
 13 THE WITNESS: Okay.
 14 MR. SHERBORNE: There, we see there should be a photograph on
 15 F894.092.
 16 A. Correct.
 17 Q. Do you see there a photograph of Mr. Depp?
 18 A. I do.
 19 Q. Can you just explain. It says "Sean". Can you just explain
 20 what you know about this photo?
 21 A. I took this photo on December 15th, 2015.
 22 Q. Can I just pause for one second. Just looking at the top, is
 23 that IMG 2015, 12.15, a reference to the date you just gave
 24 us?
 25 A. It is.

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1 BETT - SHERBORNE
 2 Q. Sorry, I interrupted you. If you can just explain this photo,
 3 Mr. Bett?
 4 A. When I saw this specific photo, it depicts an injury on the
 5 top of his nose and it is a photo that I took with my personal
 6 cell phone.
 7 Q. Can I just ask you to turn over the page to F894.093?
 8 A. Okay.
 9 Q. Do you see there another photograph? Did you take this one?
 10 A. I did.
 11 Q. We can see that underneath -- perhaps you can describe rather
 12 than me putting it to you. What can we see on Mr. Depp's
 13 face, around his eyes, if anything?
 14 A. You can see what appears to be slight redness. You can also
 15 see what appears to be a one and a half to two-inch vertical
 16 scratch, and you can see redness to the right of that scratch.
 17 MR. JUSTICE NICOL: Just a minute. (Pause)
 18 MR. SHERBORNE: Is that round the eye you are talking about?
 19 A. That is correct, sir.
 20 Q. Then, again, on F894.094, is this another photo you took?
 21 A. It is.
 22 Q. That is the same time?
 23 A. That is.
 24 Q. If you can just describe what you saw at the time when you
 25 were taking a photograph of?

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1 BETT - SHERBORNE
 2 A. I saw the injury, the scratch that was on the top of his nose.
 3 However, in this frontal shot, it is very hard to depict, and
 4 there was redness on the side of his right cheek, which, in
 5 this specific photo, it is a little bit more difficult to
 6 depict as well.
 7 Q. What was the cause of these injuries, Mr. Bett?
 8 MR. JUSTICE NICOL: Do you know the cause of the injuries?
 9 A. Mr. Depp told me that Ms. Heard had slapped him in the face a
 10 few times.
 11 MR. SHERBORNE: Mr. Bett, I am just going to then ask you a few
 12 questions about 21st May.
 13 A. Okay.
 14 Q. You remember you were asked about this by Ms. Wass. It is
 15 probably easiest if you look at paragraph 15 of your witness
 16 statement. Your Lordship can put file 6 away, my Lord.
 17 A. Okay, paragraph 15.
 18 Q. If you just bear with us one moment, Mr. Bett, his Lordship is
 19 just going to find paragraph 15 of your witness statement.
 20 MR. JUSTICE NICOL: Yes.
 21 MR. SHERBORNE: It was put to you by Ms. Wass that you did not
 22 really get a proper view of Ms. Heard. Do you agree that you
 23 did not get a proper view of Ms. Heard or not, Mr. Bett?
 24 A. No, I had a great view of Ms. Heard.
 25 Q. How many years did you work in the Sheriff's Department?

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1 BETT - SHERBORNE
 2 A. Approximately 14.
 3 Q. During the course of your time at the Sheriff's Department,
 4 did you have experience of allegations of violence or not?
 5 A. Specifically related to calls for service?
 6 Q. Yes.
 7 A. Oh, indeed I did.
 8 Q. You say in your witness statement that Ms. Heard had no red
 9 marks or evidence of any bruises, abrasions to her face, or
 10 body. Having heard Ms. Wass's questions, do you want to
 11 change that evidence at all?
 12 A. Not at all.
 13 Q. It was put to you, Mr. Bett -- and I should give you the
 14 opportunity to comment on it -- that you are lying for
 15 Mr. Depp. That is what you have come here to do. What do you
 16 have to say about that?
 17 A. That is incorrect, sir.
 18 Q. Then, finally, you say in your statement, "I could see
 19 Mr. Depp was visibly upset at having been accused of hitting
 20 Ms. Heard".
 21 A. Correct.
 22 Q. Had you seen Mr. Depp be in this state before?
 23 A. No.
 24 MR. SHERBORNE: I have no further questions, thank you very much
 25 Mr. Bett. I do not know whether your Lordship has any

[Page 1310]

1 DISCUSSION
 2 questions?
 3 MR. JUSTICE NICOL: No, I do not. Mr. Bett, thank you very much
 4 for coming to give your evidence to this court.
 5 THE WITNESS: Thank you sir.
 6 MR. JUSTICE NICOL: You are free to go now.
 7 THE WITNESS: Thank you.
 8 (The witness withdrew)
 9 MR. SHERBORNE: The next witness is Mr. Romero, who is in
 10 Los Angeles. I wonder whether your Lordship would take the
 11 mid-morning break now for ten minutes so we can establish
 12 whether Mr. Romero, who is coming off the end, as I understand
 13 it, of a shift, so it is a very early hour in the morning, has
 14 actually finished his shift yet.
 15 MR. JUSTICE NICOL: Right. Okay, I will rise then. Ten minutes.
 16 (A short break)
 17 MS. WASS: I did not want to interrupt Mr. Sherborne in case he
 18 wanted to say something. Thank you, my Lord, for coming back
 19 into court. Those instructing me have had an enquiry from the
 20 Press Association which indicates that there have been a
 21 number of requests to obtain the witness statements of
 22 Winona Ryder and Vanessa Paradis, and an enquiry as to whether
 23 there is some ambiguity about the statement of the documents,
 24 namely, their witness statements.
 25 There is, in our submission, no ambiguity at all. We

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1 DISCUSSION
 2 would have wanted to cross-examine both Winona Ryder and
 3 Vanessa Paradis, but a decision has been made by the claimant
 4 to abandon them as witnesses. As I understand it, as a result
 5 of that, their statements are not to be released to the press
 6 under the rules, but I think confirmation from my Lord would
 7 be of assistance to the media.
 8 MR. JUSTICE NICOL: Yes. Mr. Sherborne.
 9 MR. SHERBORNE: Your Lordship knows that given there was no
 10 challenge to Mr. Depp's evidence, there was no need to call
 11 Ms. Ryder or Ms. Paradis. It is not a question of abandoning
 12 anything. It was not put to Mr. Depp. He was not challenged
 13 on his evidence so we are not calling them.
 14 MR. JUSTICE NICOL: The position is, as I have understood it, that
 15 it is a condition of calling a witness that a witness
 16 statement is served in advance.
 17 MR. SHERBORNE: Yes.
 18 MR. JUSTICE NICOL: If a witness statement is served, there is not
 19 an obligation on the party who has served that witness
 20 statement to call that witness.
 21 MR. SHERBORNE: No, of course not, my Lord. Yes, that is
 22 absolutely right.
 23 MR. JUSTICE NICOL: I am sorry if I am taking this stage by stage.
 24 MR. SHERBORNE: No, I understand why your Lordship is doing so.
 25 Sorry.

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1 DISCUSSION

2 MR. JUSTICE NICOL: But there are circumstances, if the party who

3 has served the witness statement chooses not to call that

4 witness, that the opponent can put the witness statement in in

5 some form.

6 MR. SHERBORNE: Yes, only if you are going to rely on it. I think

7 the case, without looking at it, relates to the Douglas v

8 Hello litigation in 2000 where a party wanted to rely on a

9 statement of a witness who was not called, but of course, that

10 was where the other side wanted to rely on the statement

11 because it supported them. There is no question here that

12 Ms. Wass is going to ask to rely on the witness statement of

13 either Ms. Ryder or Ms. Paradis because it contradicts her

14 suggestion.

15 MR. JUSTICE NICOL: At the moment, I am simply asking for

16 assistance as to whether I have correctly remembered the

17 rules.

18 MR. SHERBORNE: That is the rule, yes. What you cannot do is put

19 the statement in and then try and challenge parts of it, or

20 comment on it.

21 MR. JUSTICE NICOL: Let us take it stage by stage.

22 MR. SHERBORNE: Yes.

23 MR. JUSTICE NICOL: You are not calling Ms. Paradis and you are

24 not calling Ms. Ryder.

25 MR. SHERBORNE: My Lord, no, exactly.

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1 DISCUSSION

2 MR. JUSTICE NICOL: The next stage, as I have understood it, but

3 again help me if I have misremembered, is that it is only if

4 the party who has served the witness statement actually calls

5 that witness that a third party can ask to inspect the witness

6 statement.

7 MR. SHERBORNE: My Lord, that is my understanding. If we are

8 talking now about the Press Association or any third party,

9 then, as I understand it, the witness statement only becomes

10 available once the witness enters the witness box, so to

11 speak. That is my understanding.

12 MR. JUSTICE NICOL: Perhaps we could just look at the White Book.

13 MR. SHERBORNE: It is 32.13, my Lord. It is page 1088 of the

14 2020, volume 1.

15 MR. JUSTICE NICOL: This is rule 32.13: "A witness statement

16 which stands as evidence-in-chief is open to inspection during

17 the course of the trial unless the court orders otherwise."

18 MR. SHERBORNE: My Lord, yes, "and any person may ask for a

19 direction that a witness statement is not open to inspection."

20 MR. JUSTICE NICOL: That is, as it were, closing a window that

21 would otherwise be open.

22 MR. SHERBORNE: My Lord, yes. Then, if you look to the opposite

23 page, there is a reference to a decision of Mann J in the News

24 Group hacking litigation, the mobile telephone voicemail

25 interception litigation, as it is called. It is the third

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1 DISCUSSION

2 paragraph down entitled "Various claimants against News

3 Group". (Pause for reading)

4 MR. JUSTICE NICOL: Yes.

5 MR. SHERBORNE: My Lord, I should just say that we are entirely

6 neutral on this subject, but I understand your Lordship wants

7 me to assist the court in relation to what is the appropriate

8 jurisdiction. I think it is equally fair to say, as I recall

9 -- and I hope I am not setting a hare running -- that these

10 statements may have been referred to at an earlier hearing and

11 that might be why this has come up. I have not been involved

12 in discussions with the Press Association so I was not aware

13 that this particular matter was going to be raised. I make no

14 criticism of anyone; I am just explaining my personal

15 position.

16 MR. JUSTICE NICOL: There was an earlier application by the

17 claimant for permission to rely on the witness statements ---

18 MR. SHERBORNE: They were opposed by the defendants. The

19 defendants did not want these witness statements introduced,

20 if you recall.

21 MR. JUSTICE NICOL: Yes.

22 MR. SHERBORNE: Your Lordship granted ---

23 MR. JUSTICE NICOL: But then, I think, changed position before the

24 hearing because I do not think that I was required to give a

25 ruling on Ms. Ryder and Ms. Paradis's witness statements.

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1 DISCUSSION

2 MR. SHERBORNE: That is right. They originally opposed permission

3 with a number of other statements, I think, and then they

4 abandoned their opposition to those statements. Obviously,

5 I have said what I have said about the way in which the case

6 has now been put by the defendants. In terms of the

7 availability of those statements, as I say, we are entirely

8 neutral.

9 MR. JUSTICE NICOL: Now, I am told that Mr. Tobin of the Press

10 Association would like to address the court. Is Mr. Tobin in

11 court?

12 MR. SHERBORNE: I do not see anyone different in court. I do not

13 know if he is in one of the outside courts, to use the

14 analogy.

15 MR. JUSTICE NICOL: I will just ask. Perhaps my clerk can find

16 out where he is and whether he would like to come into this

17 court. While I am waiting for a response to that, perhaps

18 I can ask Ms. Wass what the defendants' position is.

19 MR. SHERBORNE: Of course.

20 MS. WASS: The defendants' position only is to clarify the

21 ambiguity which was mentioned in the e-mail that we received.

22 We would wish to cross-examine these witnesses. They are

23 character witnesses for Mr. Depp and we would have wished to

24 cross-examine them.

25 Now, Mr. Depp is not obliged to rely on them and this

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<p>1 DISCUSSION</p> <p>2 morning, he has announced that he does not rely on them. It</p> <p>3 is only that ambiguity which we consider needs clarification,</p> <p>4 but we do not make representations about whether their</p> <p>5 statements are released. As I understand the rules in the</p> <p>6 White Book, they should not be released. Of course, there is</p> <p>7 nothing to stop anybody on behalf of Mr. Depp releasing</p> <p>8 documents. As my Lord knows, Miss Kate James's statement was</p> <p>9 released to the Daily Mail yesterday. There is nothing to</p> <p>10 stop ----</p> <p>11 MR. JUSTICE NICOL: Let us keep to the point, please, Ms. Wass.</p> <p>12 Mr. Sherborne, I want to keep to the point.</p> <p>13 MS. WASS: Of course. We do not say it falls within the ambit of</p> <p>14 rule 32.1.3, they are not witnesses as a result of the</p> <p>15 decision taken by the claimant this morning.</p> <p>16 MR. JUSTICE NICOL: Yes. All right. Thank you. Now, I am told</p> <p>17 that Mr. Tobin is on his way.</p> <p>18 MR. SHERBORNE: I am grateful. My Lord, can I raise one other</p> <p>19 matter. Apart from simply to say this, I will resist</p> <p>20 temptation to say there is no cross-examination that could</p> <p>21 have been had of Ms. Paradis.</p> <p>22 MR. JUSTICE NICOL: Mr. Sherborne, let us keep to the point.</p> <p>23 MR. SHERBORNE: Can I raise the other matter, and that was what</p> <p>24 I was going to say right at the outset, when your Lordship</p> <p>25 came in, which was that I am very sorry that we, at the</p>	<p>1 DISCUSSION</p> <p>2 Mr. Sherborne has given me an explanation; but that is beside</p> <p>3 the point, because the witnesses are not being called.</p> <p>4 My attention has been drawn to Civil Procedure rules,</p> <p>5 rule 32.13, which says this: "(1) A witness statement which</p> <p>6 stands as evidence-in-chief is open to inspection during the</p> <p>7 course of the trial unless the court orders otherwise."</p> <p>8 Ordinarily, when a party calls a witness where a witness</p> <p>9 statement has been served, the witness statement does indeed</p> <p>10 stand as their evidence-in-chief. But since neither</p> <p>11 Ms. Paradis nor Ms. Ryder have been called to give evidence,</p> <p>12 subject to anything that you want to say, it seems to me that</p> <p>13 provision does not apply.</p> <p>14 MR. TOBIN: I would agree with that, my Lord, but I would say that</p> <p>15 the CPR is not the be all and end all in this case. Documents</p> <p>16 have been referred to in open court, they have been quoted</p> <p>17 from, as I remember it the parties' opening note.</p> <p>18 MR. JUSTICE NICOL: Just a minute. (Pause)</p> <p>19 MR. TOBIN: I was trying to find the documents, but as I remember</p> <p>20 it, in one of the earlier hearing in March, there was a</p> <p>21 section from Ms. Ryder's statement quoted in that document,</p> <p>22 I believe the full paragraph. (Pause) I will try to find that</p> <p>23 in a minute, my Lord. The position, we say, is that</p> <p>24 your Lordship has an inherent jurisdiction to give us these</p> <p>25 documents. They may not be available under the CPR, but they</p>
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<p>1 DISCUSSION</p> <p>2 moment, have not been able to establish whether Mr. Romero is</p> <p>3 still available, after his night shift. I do appreciate that</p> <p>4 these witnesses, he is nothing to do with Mr. Depp, he is not</p> <p>5 employed by Mr. Depp or anything like that. So, I realise</p> <p>6 that he is giving up his time at four o'clock in the morning.</p> <p>7 We just need to establish where he is. I hope that</p> <p>8 your Lordship will bear with us, but I do apologise.</p> <p>9 MR. JUSTICE NICOL: Of course, I understand. We will wait for a</p> <p>10 few minutes to see whether Mr. Tobin is available. (Pause)</p> <p>11 Now, are you Mr. Tobin?</p> <p>12 MR. TOBIN: I am indeed, my Lord.</p> <p>13 MR. JUSTICE NICOL: Mr. Tobin, welcome to this court, though</p> <p>14 I think you may be listening to it from elsewhere. Do come to</p> <p>15 the front and find a place that is convenient for you to</p> <p>16 stand. Can I tell you what I have understood the position at</p> <p>17 the moment to be. You, on behalf of the Press Association,</p> <p>18 are trying to see if you can get access to the witness</p> <p>19 statement of Vanessa Paradis.</p> <p>20 MR. TOBIN: My Lord. (Mr. Tobin is not near a microphone)</p> <p>21 MR. JUSTICE NICOL: And to the witness statement of Winona Ryder.</p> <p>22 MR. TOBIN: That is correct.</p> <p>23 MR. JUSTICE NICOL: The position is that those two witness</p> <p>24 statements were served by the claimant, by Mr. Depp, but</p> <p>25 Mr. Depp has chosen not to call those witnesses.</p>	<p>1 DISCUSSION</p> <p>2 have been referred to in open court, they have been quoted at</p> <p>3 prior hearings and they are before the court. My Lord, I have</p> <p>4 found the document. It is the skeleton argument at the</p> <p>5 directions hearing, the claimant's skeleton at the directions</p> <p>6 hearing on 12th May.</p> <p>7 MR. JUSTICE NICOL: Just a minute. (Pause) I do not think I have</p> <p>8 ----</p> <p>9 MR. TOBIN: It may not be in your Lordship's bundle.</p> <p>10 MR. JUSTICE NICOL: I have lots of other documents, but I do not</p> <p>11 think I have that one. Do you want to remind me as to what</p> <p>12 that document says?</p> <p>13 MR. TOBIN: Paragraphs 35 and 36, my Lord, paragraph 35 refers to</p> <p>14 Ms. Paradis's statement: "I have known Johnny for more than</p> <p>15 25 years. We have been partners for 14 years, we have two</p> <p>16 children together. ...(reads to the words)... also he was</p> <p>17 never violent or abusive to me." That refers to paragraph 5.7</p> <p>18 of Ms. Paradis's witness statement. The following paragraph</p> <p>19 refers to paragraph 7 of ----</p> <p>20 MR. JUSTICE NICOL: Sorry, what was the paragraph 36 of the</p> <p>21 skeleton?</p> <p>22 MR. TOBIN: 35 of Ms. Paradis's and 36 of the skeleton for</p> <p>23 Ms. Ryder. There is a bundle reference.</p> <p>24 MR. JUSTICE NICOL: Do not worry about the bundle reference. The</p> <p>25 skeleton quoted in paragraph 36, is it part of Ms. Ryder's</p>

[20] (Pages 1316 to 1319)

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1 DISCUSSION
 2 statement?
 3 MR. TOBIN: Correct. It quoted: "I cannot wrap my head around
 4 Ms. Heard's accusations ...(reads to the words)... he was
 5 never, never violent towards me. He was never, never abusive
 6 at all towards me." As your Lordship can probably imagine,
 7 that was the extensively reported at the time of the hearing.
 8 MR. JUSTICE NICOL: Yes. Mr. Tobin, before you came in, I think
 9 it is fair to let you know that both Mr. Sherborne and
 10 Ms. Wass said they were neutral on the application. But of
 11 course, they were both assisting me in directing my attention
 12 to the relevant law, as best as they could. Now, is there
 13 anything else that you want to say?
 14 MR. TOBIN: The only thing I would say, my Lord, is to refer to
 15 the Supreme Court in Dring, which I think was mentioned.
 16 MR. JUSTICE NICOL: Sorry, which case?
 17 MR. TOBIN: Cape Intermediate Holdings Ltd v Dring
 18 MR. JUSTICE NICOL: Cape Holdings v Dring.
 19 MR. TOBIN: Yes. [2019] UKSC 38. It says, at paragraph 9 it
 20 refers to the judgment below in the Court of Appeal, which
 21 said: "...the court had an inherent jurisdiction to permit a
 22 non-party to obtain (i) witness statements of witnesses,
 23 including experts, whose statements or reports stood as
 24 evidence-in-chief at trial and which would have been available
 25 for inspection", that is the ruling of the Court of Appeal it

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1 DISCUSSION
 2 referred to. I would say that judgment is very clear, that
 3 any document which is before the court, has been referred to
 4 in open court or quoted from a skeleton, then your Lordship
 5 has an inherent jurisdiction to (unclear).
 6 MR. JUSTICE NICOL: Right. Anything else you want to say?
 7 MR. TOBIN: No, my Lord.
 8 MR. JUSTICE NICOL: Thank you very much indeed. You can sit down
 9 while I hear whether Mr. Sherborne or Ms. Wass want to say
 10 anything in response to what you have said.
 11 MR. TOBIN: (Unclear)
 12 MR. JUSTICE NICOL: Thank you. Now, Ms. Wass, first, is there
 13 anything you want to say?
 14 MS. WASS: No. As I have made the position plain, we would have
 15 liked to cross-examine these witnesses.
 16 MR. JUSTICE NICOL: Yes.
 17 MS. WASS: But that is the only observation I make, not in terms
 18 of they are released to the press.
 19 MR. SHERBORNE: My Lord, all I would say, for the third time,
 20 there is no basis for Ms. Wass to be able to cross-examine,
 21 unless she had put to Mr. Depp, which she deliberately chose
 22 not to do. Whatever she may have wanted to do, she did to the
 23 communicate to Mr. Depp or do it in a permissible way. Those
 24 are the rules.
 25 In terms of our observation, we have nothing to say. We

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1 DISCUSSION
 2 are entirely neutral, as I have said all along. It is
 3 entirely a matter for your Lordship.
 4 MR. JUSTICE NICOL: What Mr. Tobin has referred to is the use or
 5 the deployment of the witness statements at an earlier
 6 hearing. Again, speaking from memory, but you can correct me
 7 if I am wrong, the general principle is that if something has
 8 been referred to in open court, then it is reportable.
 9 MR. SHERBORNE: Yes, my Lord.
 10 MR. JUSTICE NICOL: He has mentioned that parts of the statement
 11 were referred to in open court, and that would seem to engage
 12 that principle. Does that make a difference to anything that
 13 you had to say before?
 14 MR. SHERBORNE: Well, my Lord, I am a slight disadvantage, because
 15 my recollection of how much and what was before the court
 16 might be clearer -- and, as I said, no criticism of anyone --
 17 I was not aware that this point was going to arise this
 18 morning. If the material was referred to, then yes, it is
 19 available. It is a different position, obviously, to what has
 20 happened -- --
 21 MR. JUSTICE NICOL: It is a different basis for making the
 22 material available than 32.13.
 23 MR. SHERBORNE: It is, my Lord. Your Lordship is absolutely
 24 right.
 25 MR. JUSTICE NICOL: In view of that, and although what Mr. Tobin

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1 DISCUSSION
 2 has said is that only parts of the witness statement were
 3 quoted, I am not, unless there is anything that you want to
 4 say, inclined to distinguish one part of the statement from
 5 another.
 6 MR. SHERBORNE: My Lord, no, I understand.
 7 MR. JUSTICE NICOL: Therefore, I am inclined to say that, by one
 8 means or another, those witness statements should be made
 9 available. But explaining, if necessary, that the witness was
 10 not called and the reason that I have said that they should be
 11 made available to the Press Association is because of the
 12 quotation from part of the witness statement on an earlier
 13 occasion.
 14 MR. SHERBORNE: My Lord, yes.
 15 MR. TOBIN: I am grateful, my Lord.
 16 MR. JUSTICE NICOL: Thank you for mentioning it, Mr. Tobin, and
 17 thank you for coming to court this morning. All right.
 18 MR. SHERBORNE: I wonder whether, given it is now just coming up
 19 to one o'clock, the most sensible way, and I am obviously in
 20 your Lordship's hands, is that over the short adjournment we
 21 can investigate whether Mr. Romero is awake! And then we come
 22 back to that.
 23 MR. JUSTICE NICOL: Wake him up to ask him that question!
 24 (Laughter)
 25 MR. SHERBORNE: We have Mr. Jenkins at two o'clock, by way of

[Page 1324]

1 DISCUSSION
 2 video link.
 3 MR. JUSTICE NICOL: Good. All right.
 4 MR. SHERBORNE: If we can start at two and then hopefully by then
 5 it will be a more decent hour in Los Angeles.
 6 MR. JUSTICE NICOL: All right.
 7 MR. SHERBORNE: Thank you, my Lord.
 8 MR. JUSTICE NICOL: Then I will rise until two o'clock.
 9 (Adjourned for a short time)
 10
 11 MR. SHERBORNE: Can I call our next witness, Mr. Starling Jenkins.
 12 MR. JUSTICE NICOL: Yes. Mr. Jenkins, can you hear me?
 13 THE WITNESS: Yes.
 14 MR. JUSTICE NICOL: First of all, thank you for coming to give
 15 your evidence in this case and thank you for doing it at what
 16 may be an uncomfortable time in the morning for you, in
 17 Los Angeles.
 18 THE WITNESS: I am here 24 hours, 24/7.
 19 MR. JUSTICE NICOL: Thank you. The first thing that is going to
 20 happen is that I am going to ask you to either swear to tell
 21 the truth or to affirm to tell the truth; which would you
 22 prefer to do?
 23 THE WITNESS: Swear on the bible, sir.
 24 MR. JUSTICE NICOL: Do you have a bible there. Good.
 25

[Page 1325]

1 JENKINS
 2 MR. STARLING JENKINS, SWORN
 3 EXAMINED BY MR. SHERBORNE
 4 (via video link)
 5 MR. JUSTICE NICOL: You can put the bible to one side now,
 6 Mr. Jenkins. Thank you. Yes, Mr. Sherborne.
 7 MR. SHERBORNE: Mr. Jenkins, I am counsel on behalf of Mr. Depp.
 8 Can I ask you to give your full name to the court, please.
 9 A. Yes. Starling Thornton Jenkins III.
 10 Q. I am very grateful, Mr. Jenkins. Can I ask, is it possible to
 11 raise the volume a little bit this side. Thank you.
 12 Mr. Jenkins, can you hear us clearly?
 13 A. Yes.
 14 Q. Thank you. Now, because you are giving evidence from
 15 Los Angeles, there is a little bit of a time delay, as we have
 16 noticed with other witnesses who have also sat in the seat you
 17 are sitting in and giving their evidence. So, I will try my
 18 best, as will counsel for the defendants, Ms. Wass, once we
 19 have finished a question, to pause, and wait for you to hear
 20 that question and then answer. If at any stage you feel that
 21 you are about to say something and someone has talked across
 22 you, please feel free to say that, because we are here to hear
 23 your evidence, not the questions.
 24 A. I understand.
 25 Q. Thank you. Can I then begin, Mr. Jenkins, by asking you to

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1 JENKINS - SHERBORNE
 2 find your witness statement, which should be in file 2 to your
 3 left. Do you have open then, it should be page D233, on the
 4 bottom right-hand corner.
 5 A. Yes.
 6 Q. That is your witness statement; yes?
 7 A. Yes, it is.
 8 Q. Thank you. Can I ask you, Mr. Jenkins, to turn to page D236.
 9 MR. JUSTICE NICOL: Can you give me the tab, please?
 10 MR. SHERBORNE: 59C, my Lord. Do you see on page D236 a
 11 signature?
 12 THE WITNESS: Yes.
 13 Q. Is that your signature, Mr. Jenkins?
 14 A. Yes, it is.
 15 Q. Can I confirm with you that the contents of your witness
 16 statement are true?
 17 A. Yes.
 18 MR. SHERBORNE: If you wait there, Mr. Jenkins, Ms. Wass on behalf
 19 of the defendants may have some questions for you. Thank you
 20 very much.
 21
 22
 23
 24
 25

[Page 1327]

1 JENKINS
 2 CROSS-EXAMINED BY MS. WASS
 3 Q. Mr. Jenkins, you have worked for Mr. Depp since 1993; is that
 4 is correct?
 5 A. Yes.
 6 Q. So, 27 years; yes?
 7 A. Yes.
 8 Q. You have made a statement dated 11th May of this year, about
 9 events in April 2016.
 10 A. Yes.
 11 Q. There are two aspects I want to ask you about. The first is
 12 the evening of 21st April, I think you said in your statement
 13 that you were working at the security -- have you got your
 14 statement out there in front of you?
 15 A. Yes.
 16 Q. It is easier if you follow it, so that you know I am reading
 17 it out correctly. Can you see paragraph 9?
 18 A. Yes. Yes.
 19 Q. "I was working a security shift at the 849 South Broadway
 20 residence on the night of 21st April, the night Amber was
 21 celebrating her birthday with friends. When I left the
 22 residence, Johnny had not arrived." That is correct; yes?
 23 A. That is correct.
 24 Q. Did your shift that night end at about 11 o'clock?
 25 A. Yes.

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1 JENKINS - WASS
 2 Q. Thank you. Now, the following day, I think you spent some
 3 time trying to find Mr. Depp's telephone?
 4 A. Three and a half hours, ma'am.
 5 Q. Just for the sake of completeness, it was not only Mr. Depp's
 6 telephone that you were looking for, it was Ms. Heard's
 7 telephone as well?
 8 A. Negative.
 9 Q. And both ----
 10 MR. JUSTICE NICOL: Just a minute. (Pause) When you say
 11 "negative", Mr. Starling, does that mean you disagree with
 12 that question?
 13 THE WITNESS: Yes.
 14 MR. JUSTICE NICOL: Thank you.
 15 MS. WASS: You then drove Ms. Heard and some of her friends to the
 16 Coachella music festival the next day; that would be the 22nd,
 17 do you agree -- of April? Do you want to look at your
 18 statement?
 19 A. That was the 22nd, the next day.
 20 Q. Yes.
 21 A. Yes.
 22 Q. And the party spent the weekend at the festival?
 23 A. Yes.
 24 Q. And alcohol was consumed by the party, as far as you were
 25 aware?

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1 JENKINS - WASS
 2 A. Yes.
 3 Q. Were you ever invited to be part of that group that was
 4 enjoying the music festival, or were you simply a part as a
 5 driver who was not engaged in the music festival but simply
 6 there on duty?
 7 A. I was working.
 8 Q. You were working and they were partying; is that right?
 9 A. Yes.
 10 Q. And you ----
 11 A. That is correct.
 12 Q. You said at one stage in your statement that you saw Ms. Heard
 13 throw up in the parking lot. Do you remember that?
 14 A. Yes.
 15 Q. And you said that she asked for ginger ale and crackers?
 16 A. Ginger ale, crackers, Pedialyte and water.
 17 Q. Sorry. I missed the third thing.
 18 A. And possibly Gatorade also.
 19 MR. JUSTICE NICOL: Mr. Jenkins, we are having a little trouble
 20 hearing your answer. Is the microphone something that you can
 21 move a little closer to you?
 22 THE WITNESS: Is that better, your Honour?
 23 MR. JUSTICE NICOL: That is much better, thank you very much.
 24 Could you repeat your last answer. Ginger ale, crackers, and
 25 then?

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1 JENKINS - WASS
 2 THE WITNESS: Ginger ale, Pedialyte, Gatorade.
 3 MS. WASS: You recalled that when you first made a deposition.
 4 Was it the first time you had to remember this incident when
 5 you made a declaration in court?
 6 A. Yes.
 7 Q. And was that last year?
 8 A. It was May.
 9 Q. May 2019?
 10 A. (Unclear) May.
 11 Q. Are we talking about May 2019?
 12 A. Yes, correct.
 13 Q. You remember the Coachella music festival that had taken place
 14 three years before?
 15 A. Yes.
 16 Q. And you remember the vomiting, somebody vomiting, and you said
 17 that was Ms. Heard?
 18 A. Ms. Heard vomiting.
 19 Q. I think you said Ms. Heard vomiting or did you say her
 20 vomiting?
 21 A. Ms. Heard vomiting.
 22 Q. Mr. Jenkins, there is no dispute that a Ms. Heard vomited, but
 23 in fact it was Ms. Heard's sister, Whitney Heard, who was the
 24 one of the party who was ill on that visit to Coachella. So,
 25 you have the wrong sister, that is what I am suggesting to

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1 JENKINS - WASS
 2 you?
 3 A. No, it was Ms. Heard was sick.
 4 Q. That is your evidence, and as I have made plain ----
 5 MR. JUSTICE NICOL: Just a moment, please.
 6 THE WITNESS: Ms. Amber Heard was sick.
 7 Q. Do you know Whitney Heard or Henriquez, Mr. Jenkins?
 8 A. Yes, I do know Ms. Whitney Heard. I know the difference
 9 between the two sisters.
 10 MS. WASS: Presumably, whoever was vomiting had their face
 11 pointing away from you?
 12 A. Ms. Heard was vomiting. Amber Heard was vomiting.
 13 Q. You are insistent about this, but what I am suggesting is that
 14 what you saw, what you actually saw, was a blonde woman, a
 15 woman with long blonde hair, vomiting and you saw the back of
 16 that woman's head?
 17 A. That is incorrect.
 18 Q. Are you saying that the person who was vomiting was actually
 19 facing you at the time of vomiting?
 20 A. She was not facing me, but the dress she was wearing, the
 21 outfit she was wearing, was Miss Amber Heard. She was
 22 vomiting.
 23 Q. So you identified this person by their clothing rather than
 24 any other feature; is that right?
 25 A. Correct.

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<p>1 JENKINS - WASS</p> <p>2 MS. WASS: My Lord, I will not take the matter any further. That</p> <p>3 is all I ask. Thank you very much indeed, Mr. Jenkins, for</p> <p>4 answering my questions.</p> <p>5 MR. JUSTICE NICOL: Any re-examination?</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>1 JENKINS - SHERBORNE</p> <p>2 with the group?</p> <p>3 A. I was shadowing the group.</p> <p>4 Q. You were shadowing them.</p> <p>5 A. Yes.</p> <p>6 MR. SHERBORNE: Thank you very much. My Lord, I was going to ask</p> <p>7 Mr. Jenkins one further question and it arose out of a</p> <p>8 question put to Mr. Depp by Ms. Wass. I do not know if you</p> <p>9 recall, but Ms. Wass asked Mr. Depp if Mr. Jenkins was driving</p> <p>10 the car that took Mr. Depp, Miss Amber Heard and Miss Whitney</p> <p>11 Heard to the set of the Keith Richards documentary. She put</p> <p>12 to Mr. Depp that Mr. Jenkins was driving that day. I was just</p> <p>13 going to ask Mr. Jenkins two questions.</p> <p>14 MR. JUSTICE NICOL: Just a moment. (Pause) Can you just remind me</p> <p>15 of the date of that incident?</p> <p>16 MR. SHERBORNE: Well, that is a rather interesting question</p> <p>17 because ----</p> <p>18 MR. JUSTICE NICOL: If it is controversial, do not ----</p> <p>19 MR. SHERBORNE: It is March 2013. We say it is not controversial;</p> <p>20 it is 21st, 22nd and 23rd March. Mr. Jenkins will either</p> <p>21 remember -- there is only meant to be one trip there, so he</p> <p>22 will either remember it or he will not.</p> <p>23 MR. JUSTICE NICOL: Just a moment. This does not arise out of</p> <p>24 Mr. Jenkins's cross-examination, but you are asking for</p> <p>25 permission to ask that question.</p>
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<p>1 JENKINS</p> <p>2 RE-EXAMINED BY MR. SHERBORNE</p> <p>3 MR. SHERBORNE: Mr. Jenkins, there are just a couple of</p> <p>4 questions. You mentioned that Ms. Heard asked for ginger ale.</p> <p>5 Sorry, we are just changing the microphones over. Sorry,</p> <p>6 Mr. Jenkins, I will start again.</p> <p>7 A. No problem, sir. That is good.</p> <p>8 Q. You mentioned that Miss Amber Heard asked for ginger ale and</p> <p>9 crackers and you mentioned Pedialyte.</p> <p>10 A. Yes.</p> <p>11 Q. Pedialyte is not something that we necessarily have in</p> <p>12 England. Can you just explain what is Pedialyte?</p> <p>13 A. It is a drink that if you are dehydrated, it hydrates you</p> <p>14 faster than water or Gatorade. It will get your electrolytes</p> <p>15 up a lot quicker.</p> <p>16 Q. Thank you. Mr. Jenkins, are you in any way confused about the</p> <p>17 difference between Miss Whitney Heard and Miss Amber Heard?</p> <p>18 A. No.</p> <p>19 Q. Have you any doubt at all that the person who you saw throwing</p> <p>20 up in the car park was Amber Heard?</p> <p>21 A. I have no doubt.</p> <p>22 Q. It was said to you by Ms. Wass that your role at Coachella was</p> <p>23 to be as part of your job and not partying with Ms. Heard, but</p> <p>24 the question is this, Mr. Jenkins: when you were there, did</p> <p>25 you stay well away from the group or were you in close contact</p>	<p>1 JENKINS - SHERBORNE</p> <p>2 MR. SHERBORNE: My Lord, yes. It was a question asked of Mr. Depp</p> <p>3 by Ms. Wass.</p> <p>4 MR. JUSTICE NICOL: Yes. Ms. Wass, is there anything you want to</p> <p>5 say?</p> <p>6 MS. WASS: My Lord, the rule, as I have reminded Mr. Sherborne</p> <p>7 before, is that questions in re-examination are permitted only</p> <p>8 in respect of matters arising out of cross-examination. If</p> <p>9 the claimants had wanted to pursue this aspect of it, it is a</p> <p>10 week since Mr. Depp was cross-examined about March 2015,</p> <p>11 probably more than a week, and we have no notice of what this</p> <p>12 witness is going to say. The proper course would have been</p> <p>13 for them to take a witness statement from him. They have had</p> <p>14 a week in which to do that and have chosen not to do that.</p> <p>15 I have not raised it in cross-examination with this witness</p> <p>16 and we do object to this method of trying to adduce evidence</p> <p>17 in an improper way.</p> <p>18 MR. SHERBORNE: I am not sure what is improper about it. It was</p> <p>19 simply a question ----</p> <p>20 MR. JUSTICE NICOL: I think what is being said to be improper,</p> <p>21 Mr. Sherborne, is that this does not arise out of</p> <p>22 cross-examination of this witness and re-examination is</p> <p>23 confined to matters arising out of cross-examination.</p> <p>24 MR. SHERBORNE: My Lord, yes, that is why I ask for permission to</p> <p>25 ask the question.</p>

[24] (Pages 1332 to 1335)

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1 JENKINS - SHERBORNE
 2 MR. JUSTICE NICOL: Indeed, but you prefaced your comment that you
 3 did not understand what was improper and I was just explaining
 4 to you what I understood the objection to be.
 5 MR. SHERBORNE: I understand what your Lordship says. I am sorry.
 6 Yes, I appreciate it does not arise out of cross-examination.
 7 That is why I asked for permission to ask it. It arose from
 8 something that was put to Mr. Depp. It is a very small point.
 9 MR. JUSTICE NICOL: What is said is that had you wished to adduce
 10 evidence from this witness about that matter, you could have
 11 served an additional witness statement and since you have not,
 12 Ms. Wass has not had notice of what it is that you wish to
 13 adduce.
 14 MR. SHERBORNE: Well, it is very simple. She has had notice
 15 because it was her question to Mr. Depp, "Was Mr. Jenkins
 16 driving that day?", and Mr. Depp said he could not remember.
 17 So, Ms. Wass said she could not take it further.
 18 I assumed in cross-examination that she was going to ask
 19 Mr. Jenkins whether he was driving on that day and then I
 20 could ask him, on the basis of that, if she said to him he
 21 was, I could have asked him whether he saw Mr. Depp hang a dog
 22 out of a window, which is what Mr. Depp denied, but if it is
 23 not going to be asked ----
 24 MR. JUSTICE NICOL: Well ----
 25 MR. SHERBORNE: Your Lordship will see that is all it was to do

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1 JENKINS - SHERBORNE
 2 with.
 3 MR. JUSTICE NICOL: Mr. Sherborne, we have travelled, to some
 4 extent, over this ground on previous occasions. It seems to
 5 me that the objection having been raised, it is a sound
 6 objection. It does not arise out of cross-examination of this
 7 witness and I am not going to permit you to ask that in
 8 re-examination.
 9 MR. SHERBORNE: I understand. Can I just ask one last question?
 10 I forgot to take Mr. Jenkins to a photograph. Mr. Jenkins,
 11 have you got file 9 to your left?
 12 A. Yes, sir.
 13 Q. I am grateful. Behind tab 91A, if your bundle has been
 14 updated, do you have there a document entitled "J5.1"?
 15 A. Yes.
 16 MR. JUSTICE NICOL: Just a minute.
 17 MR. SHERBORNE: I am just waiting for his Lordship to find it.
 18 MR. JUSTICE NICOL: Sorry, 91A?
 19 MR. SHERBORNE: 91A.
 20 MR. JUSTICE NICOL: Just a moment. (Pause) Yes, J5.1.
 21 THE WITNESS: Yes, I have it. That is my photo.
 22 MR. SHERBORNE: Mr. Jenkins, I was going to ask you if you can
 23 identify it. That is your photo, you said?
 24 A. That is my photo.
 25 Q. We can see at the top that it says 23rd April 2016?

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1 JENKINS - SHERBORNE
 2 A. Yes.
 3 Q. That is the day of Coachella. Can you identify
 4 Miss Amber Heard in that photo?
 5 A. Right in the middle, wearing the white dress.
 6 MR. JUSTICE NICOL: Just a minute. The dresses are all rather
 7 coloured, but which is Ms. Heard?
 8 A. She is the third one right on the left.
 9 MR. SHERBORNE: Right in the middle.
 10 A. (Unclear) next to her, the one in the striped shirt, (unclear)
 11 in the striped shirt, then Ms. Heard, then Rocky, then her
 12 male friend, then I believe this is her stylist, and her
 13 sister, Whitney, is at the end.
 14 MR. JUSTICE NICOL: So, Ms. Heard is the one in the dress that
 15 looks slightly green; is that right?
 16 A. Yes, that is correct.
 17 MR. SHERBORNE: Next to the striped T-shirt?
 18 A. Yes, correct.
 19 Q. While his Lordship was taking a note, you identified everyone
 20 in the photo and then you pointed to Whitney Heard on the far
 21 right; is that correct?
 22 A. That is correct.
 23 Q. I do not think I need to ask you to differentiate. I think
 24 you just have. Thank you, Mr. Jenkins, I have no further
 25 questions.

[Page 1339]

1 JENKINS - SHERBORNE
 2 MR. JUSTICE NICOL: Right. Mr. Jenkins, can I repeat what I said
 3 at the beginning, to thank you for coming to give your
 4 evidence in this trial, and thank you for doing so at such an
 5 uncomfortable time.
 6 THE WITNESS: No problem, your Honour.
 7 MR. JUSTICE NICOL: That concludes your evidence and we will now
 8 -- are we going to terminate the link?
 9 MR. SHERBORNE: We are, my Lord, yes.
 10 MR. JUSTICE NICOL: We are going to terminate the link. Thank you
 11 very much, Mr. Jenkins.
 12 THE WITNESS: All right. Have an excellent afternoon. Thank you.
 13 (The witness withdrew)
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[Page 1340]	[Page 1342]
<p>1 DISCUSSION</p> <p>2 MR. SHERBORNE: As I understand it, we have still not been able to</p> <p>3 contact Mr. Romero. We are going to endeavour to do so, but</p> <p>4 I suspect that we will not be able to be able to reach him</p> <p>5 before the end of the day and I do not really want to ask</p> <p>6 your Lordship to wait around in the hope that we do so. So,</p> <p>7 can we resume tomorrow morning with, as I understand it,</p> <p>8 Mr. Baruch? Your Lordship has the timetable so it is as per</p> <p>9 the timetable.</p> <p>10 MR. JUSTICE NICOL: Just let me check. (Pause) Mr. Baruch and</p> <p>11 Mr. McGivern due tomorrow morning?</p> <p>12 MR. SHERBORNE: That is right, my Lord, yes.</p> <p>13 MR. JUSTICE NICOL: And Ms. Divenere and Ms. Kendall in the</p> <p>14 afternoon.</p> <p>15 MR. SHERBORNE: My Lord, yes.</p> <p>16 MR. JUSTICE NICOL: Is that still the case?</p> <p>17 MR. SHERBORNE: Yes, it is.</p> <p>18 MS. WASS: My Lord, can I make an enquiry? There are two</p> <p>19 witnesses who have disappeared from the remaining list, one of</p> <p>20 whom is actually on this afternoon's list. I do not know if</p> <p>21 my Lord has the same list as Cornelius Harrell.</p> <p>22 MR. JUSTICE NICOL: Cornelius Harrell, I noted, was in square</p> <p>23 brackets.</p> <p>24 MS. WASS: Yes. I think he is ill.</p> <p>25 MR. JUSTICE NICOL: There was an issue about his state of health,</p>	<p>1 DISCUSSION</p> <p>2 appreciate knowing what it is.</p> <p>3 MR. SHERBORNE: My Lord, can I say, from our point of view -- and</p> <p>4 I do not want to start a large debate about this -- that you</p> <p>5 will have probably ascertained that the vast majority of the</p> <p>6 documents (I am not talking about the witness statements) have</p> <p>7 been put in by the defendants, so I cannot really comment on</p> <p>8 what they are there for. In terms of the documents that we</p> <p>9 would ask your Lordship to look at, they are obviously the</p> <p>10 witness statements and obviously documents referred to in the</p> <p>11 witness statements specifically, or documents that we have</p> <p>12 drawn your Lordship's attention to during the course of</p> <p>13 submissions in our opening speech or our skeleton argument.</p> <p>14 At the moment, I am not sure it goes beyond that for our</p> <p>15 purposes.</p> <p>16 Obviously, we have not yet reached the all-important</p> <p>17 stage of Ms. Heard's cross-examination, and that answer will</p> <p>18 obviously have to expand to deal with her cross-examination,</p> <p>19 but I sincerely hope that we can limit the amount of the</p> <p>20 documents your Lordship is going to be asked to look at</p> <p>21 because I entirely sympathise with your Lordship as to the</p> <p>22 volume of material, a lot of which has not yet been referred</p> <p>23 to.</p> <p>24 MR. JUSTICE NICOL: Well, obviously, you are only able to speak</p> <p>25 for the claimant.</p>
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<p>1 DISCUSSION</p> <p>2 was there not?</p> <p>3 MR. SHERBORNE: Yes.</p> <p>4 MS. WASS: I understand that, but the person who does not appear</p> <p>5 to have an explanation for his absence is somebody called</p> <p>6 Brendan Patterson and I would be grateful for an indication as</p> <p>7 to whether that witness is still relied on by the claimant.</p> <p>8 MR. SHERBORNE: As I said to Ms. Wass before she rose, when she</p> <p>9 asked me across the court, I said I would find out and I would</p> <p>10 let her know.</p> <p>11 MR. JUSTICE NICOL: Right. Now, is there anything that either of</p> <p>12 you want to raise this afternoon, in the remainder of the</p> <p>13 afternoon?</p> <p>14 MR. SHERBORNE: My Lord, there is not.</p> <p>15 MR. JUSTICE NICOL: Can I just say something to the two of you.</p> <p>16 MR. SHERBORNE: Of course.</p> <p>17 MR. JUSTICE NICOL: I have, I think it is 12, but it may be 13,</p> <p>18 lever arch files of paper. Quite a few of the pages have been</p> <p>19 referred to in the course of evidence and when I come to</p> <p>20 consider my judgment, I will of course look back at those.</p> <p>21 But what about all the others? I am asking the question. Of</p> <p>22 course, if you say to me that they are all part of the</p> <p>23 evidence in the case, that is true, and if necessary, I will</p> <p>24 plough through 12 volumes of paper, but if there is an</p> <p>25 alternative that involves rather less work, then I would</p>	<p>1 DISCUSSION</p> <p>2 MR. SHERBORNE: Yes.</p> <p>3 MR. JUSTICE NICOL: But from the claimant's point of view, do</p> <p>4 I then record that you will ask me to look at the documents</p> <p>5 that have been referred to, either in witness statements or in</p> <p>6 the course of evidence?</p> <p>7 MR. SHERBORNE: Yes.</p> <p>8 MR. JUSTICE NICOL: But not beyond that?</p> <p>9 MR. SHERBORNE: My Lord, I would like to reflect on that, but that</p> <p>10 would be my ---</p> <p>11 MR. JUSTICE NICOL: Yes, of course, by all means reflect on that.</p> <p>12 This is simply trying to make use of some of the time this</p> <p>13 afternoon.</p> <p>14 MR. SHERBORNE: I understand, my Lord, yes.</p> <p>15 MR. JUSTICE NICOL: I wanted to flag up that if there were other</p> <p>16 documents that either side thought would be important for me</p> <p>17 when I come to give my judgment, that in some way they are</p> <p>18 identified.</p> <p>19 MR. SHERBORNE: Of course.</p> <p>20 MR. JUSTICE NICOL: That really leads me to the next point which</p> <p>21 I wanted to make. I am going back to the trial timetable.</p> <p>22 I think you have identified for the Monday and the Tuesday of</p> <p>23 week 4 that that is when submissions are going to take place.</p> <p>24 MR. SHERBORNE: Yes.</p> <p>25 MR. JUSTICE NICOL: I want to preface what I am about to say by an</p>

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1 DISCUSSION
 2 appreciation of all the work that has already gone on in this
 3 case and my hesitation about putting any further onus on you,
 4 but if it was possible to give me a reference in a written
 5 closing submission, particularly what I have in mind is the
 6 documentation that you are relying on for your various points,
 7 then I would find that helpful.
 8 MR. SHERBORNE: I understand, my Lord.
 9 MR. JUSTICE NICOL: I am not insisting and I do appreciate that
 10 you have both provided skeleton arguments in advance of the
 11 trial and I will, of course, take those into account. The
 12 point about submissions at the end of the trial is that they
 13 do also draw on the evidence that has emerged in the course of
 14 the trial. If it was possible for you to provide me with a
 15 document, or documents, that guided me to what each of you
 16 consider the particularly important parts of the evidence,
 17 then I would find that helpful.
 18 MR. SHERBORNE: Of course.
 19 MS. WASS: What I was going to say to my Lord, because my Lord has
 20 the claimant's position in mind in terms of what documents to
 21 read, is that we would invite my Lord to limit yourself to the
 22 documents that are referred to in the closing submissions,
 23 because we will invite the court to look at a variety of
 24 documents in the closing submissions. In addition, we will
 25 take up my Lord's invitation to provide references for

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1 DISCUSSION
 2 critical dates, what we say are critical dates, where there is
 3 a wealth of material, whether it is text messages, CCTV, or
 4 whatever, and we will happily present to the court a
 5 chronology with the references in respect of those dates.
 6 However, if matters are not referred to in the closing
 7 submission from the defendants, then we would say that my Lord
 8 would be safe to not trouble yourself by looking at it from
 9 the purpose of the defendants' case; but, obviously, if
 10 Mr. Sherborne refers to them, that is something different.
 11 So, we would invite my Lord to be guided by the submissions of
 12 the defendants, during which we will refer to matters that we
 13 say are relevant and which we invite my Lord to consider, but
 14 not more than that.
 15 MR. JUSTICE NICOL: Right. Good. Well, that is helpful. Thank
 16 you very much. What I had in mind, in particular, was that
 17 there are references to text schedules, and of course I have
 18 seen the schedules, but they in turn encompass rather a lot of
 19 text messages. Again, I stress that if either of you wish me
 20 to look at particular text messages, then of course I will.
 21 However, ploughing through a naked schedule is going to be
 22 quite a lot of work, and if what I take from both of you is
 23 that you both consider that I can limit myself to the messages
 24 or other parts of the evidence that you refer to in your
 25 closing submissions, or that have been referred to in the

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1 DISCUSSION
 2 course of the evidence as we have gone along, then that will
 3 be a great help.
 4 MS. WASS: We can certainly offer that comfort to the court.
 5 MR. JUSTICE NICOL: All right. Good. Now, is there anything else
 6 that either of you want to say this afternoon?
 7 MR. SHERBORNE: No, my Lord. Thank you.
 8 MR. JUSTICE NICOL: All right. Then, we will resume tomorrow at
 9 10 o'clock.
 10 (Adjourned till 10 a.m. tomorrow morning)
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