



**Planet Depos**  
We Make It Happen™

FILED  
CIVIL PROCESSING  
2022 JUN 10 10 2: 25  
JOHN T. FREY  
CLERK, CIRCUIT COURT  
FAIRFAX, VA

---

# Transcript of Jury Trial - Day 1

**Date:** April 11, 2022  
**Case:** Depp, II -v- Heard

**Planet Depos**  
**Phone:** 888.433.3767  
**Email:** [transcripts@planetdepos.com](mailto:transcripts@planetdepos.com)  
**www.planetdepos.com**

WORLDWIDE COURT REPORTING & LITIGATION TECHNOLOGY

24278

Transcript of Jury Trial - Day 1  
Conducted on April 11, 2022

1 (1 to 4)

1	3
1 VIRGINIA:	1 A P P E A R A N C E S
2 IN THE CIRCUIT COURT OF FAIRFAX COUNTY	2
3 -----x	3 ON BEHALF OF THE PLAINTIFF AND COUNTERCLAIM
4 JOHN C. DEPP, II, :	4 DEFENDANT:
5 Plaintiff and :	5 BENJAMIN G. CHEW, ESQUIRE
6 Counterclaim Defendant, :	6 BROWN RUDNICK LLP
7 v. : Civil Action No.:	7 601 Thirteenth Street NW
8 AMBER LAURA HEARD, : CL-2019-0002911	8 Suite 600
9 Defendant and :	9 Washington, D.C. 20005
10 Counterclaim Plaintiff. :	10 202.536.1700
11 -----x	11
12 JURY TRIAL DAY 1	12 SAMUEL A. MONIZ, ESQUIRE
13 BEFORE THE HONORABLE PENNEY AZCARATE	13 CAMILLE M. VASQUEZ, ESQUIRE
14 Fairfax, Virginia	14 BROWN RUDNICK LLP
15 Monday, April 11, 2022	15 2211 Michelson Drive
16 10:00 a.m. EDT	16 7th Floor
17	17 Irvine, CA 92712
18	18 949.440.0234
19 Job No.: 444990	19
20 Pages: 1 - 82	20
21 Reported by: Judith E. Bellinger, RPR, CRR	21
22	22
2	4
1 Held at:	1 A P P E A R A N C E S C O N T I N U E D
2	2
3	3 JESSICA N. MEYERS, ESQUIRE
4 CIRCUIT COURT OF FAIRFAX COUNTY	4 BROWN RUDNICK LLP
5 4110 Chain Bridge Road	5 7 Times Square
6 Courtroom 5F	6 New York, NY
7 Fairfax, Virginia 22030	7 212.209.4938
8 703.691.7320	8
9	9 REBECCA MACDOWELL LECAROS, ESQUIRE
10	10 STEPHANIE CALNAN, ESQUIRE
11	11 BROWN RUDNICK LLP
12	12 One Financial Center
13	13 Boston, MA 02111
14	14 617.856.8149
15	15
16	16
17	17
18	18
19	19
20	20
21	21
22	22

5	7
1 A P P E A R A N C E S C O N T I N U E D	1 want to approach the bench on it or something?
2	2 MR. CHEW: Yes, Your Honor, if I could.
3 ON BEHALF OF THE DEFENDANT AND COUNTERCLAIM	3 Your Honor, over the weekend, Ms. Heard
4 PLAINTIFF:	4 put on Twitter and Instagram a statement where
5	5 she's make essentially Ms. Bredehoff's opening
6 ELAINE CHARLSON BREDEHOFT, ESQUIRE	6 argument. And she's saying she never mentioned
7 ADAM S. NADELHAFT, ESQUIRE	7 Johnny in the case; she's going to be in court
8 DAVID E. MURPHY, ESQUIRE	8 today. This was put out on Saturday. It was
9 CHARLSON BREDEHOFT COHEN BROWN &	9 picked up by the Hollywood Reporter. It was
10 NADELHAFT, P.C.	10 picked up by the New York Post. It's pretty
11 11260 Roger Bacon Drive	11 outrageous, and it's exactly what Your Honor had
12 Suite 201	12 ordered us not to do. It's inconceivable, Your
13 Reston, VA 20190	13 Honor, that Ms. Heard would have done this without
14 703.318.6800	14 being green-lit by her counsel. It's really evil,
15	15 and it comes on the heels, Your Honor, two days
16 J. BENJAMIN ROTTENBORN, ESQUIRE	16 before she gets her picture in the Washington
17 WOODS ROGERS PLC	17 Post, designed to taint the jury.
18 10 South Jefferson Street	18 So at a minimum, we would ask that
19 Suite 1400	19 the -- it be added to the voir dire. We really
20 P.O. Box 14125	20 think that there should be some kind of sanctions,
21 Roanoke, VA 24011	21 that Ms. Bredehoff not be allowed to ask the
22 540.983.7540	22 questions or that her strikes be stricken. This
6	8
1 P R O C E E D I N G S	1 is exactly what you told us not to do on
2	2 February 9, and she's been flirting with this ever
3 THE BAILIFF: All rise.	3 since.
4 (The oath was administered to the court	4 MS. BREDEHOFT: Your Honor, first of
5 stenographer.)	5 all I did not know about it. I learned about it
6 THE COURT: All right. Good morning.	6 after the fact. She did not discuss it with me.
7 MR. CHEW: Good morning, Your Honor.	7 THE COURT: It's in the order.
8 MS. BREDEHOFT: Good morning.	8 MS. BREDEHOFT: Is it against Your
9 THE COURT: I understand there's some	9 Honor's order? I mean, because you said we're not
10 issues, Motion in Limine, we'll take up after we	10 going to.
11 empanel the jury later this afternoon. Okay?	11 THE COURT: I said this court will be
12 MS. BREDEHOFT: Okay.	12 tried in the courtroom.
13 THE COURT: Anything else?	13 MS. BREDEHOFT: Correct.
14 MR. CHEW: Yes, Your Honor, good	14 THE COURT: And now two days before the
15 morning.	15 jury panel, she's going to be --
16 THE COURT: Good morning.	16 MS. BREDEHOFT: I do, and I wish I had
17 MR. CHEW: Ben Chew for plaintiff,	17 known in advance so I could have stopped it. I
18 Johnny Depp. Mr. Depp is here with us.	18 didn't know that she was going to do it. I think
19 Unfortunately we have a very quick preliminary	19 her intent on it -- in fact I know her intent on
20 matter to address with you. We know that the time	20 it -- was to just to her supporters to say she was
21 is pressing.	21 going to be out of commission.
22 THE COURT: Well, that's fine. Do you	22 THE COURT: Well, that's fine. But

Transcript of Jury Trial - Day 1  
Conducted on April 11, 2022

9	11
1 other than that, (indiscernible). 2 MS. BREDEHOFT: Understood, Your Honor. 3 We have another issue as well. We got contacted 4 by counsel for Warner Brothers -- you may remember 5 the issue of the letter from counsel from Warner 6 Brothers saying this is going to be in my 7 declaration; this is what our declaration would 8 say, and we have a Motion in Limine on it. He 9 contacted us on Friday night. The press had a 10 copy of Walter Hamada's deposition which has been 11 marked confidential. I can guarantee we wouldn't 12 have leaked it. 13 THE COURT: I need to focus on other 14 things now. 15 MS. BREDEHOFT: Okay. I think it's 16 perfectly reasonable to ask the jury if they saw 17 it as part of the publicity. 18 THE COURT: This tainted my jury. 19 There's going to be repercussions. I'm going to 20 reserve it for now, but if it comes out in the 21 jury that they have seen it, there's going to be 22 repercussions. I may take your strikes.	1 issue. 2 MR. CHEW: Thank you, Your Honor. 3 THE COURT: I'll take it under 4 advisement, but I'm not going to instruct. 5 MR. CHEW: Thank you, Your Honor. We 6 appreciate it. 7 THE COURT: All right. Are there any 8 other preliminary matters before the jury comes 9 in? 10 MR. CHEW: No, Your Honor. 11 THE COURT: All right. I just want to 12 make sure. Ms. Vasquez. 13 MS. VASQUEZ: Thank you, Your Honor. I 14 just wanted to understand before the jury comes 15 in, and to have an understanding from you, if it 16 becomes apparent that there is follow-up of -- 17 THE COURT: Could you speak in the 18 microphone so the court reporter can hear you. 19 MS. VASQUEZ: Thanks, your Honor. 20 If it becomes apparent, Your Honor, 21 based on voir dire questions that a very short 22 follow-up may be necessary; would you appreciate
10	12
1 MS. BREDEHOFT: Well, I -- 2 THE COURT: There ought to be a 3 sanction for that. 4 MS. BREDEHOFT: There's definitely been 5 quotes from the Depp team in the newspapers, Your 6 Honor. 7 MR. CHEW: There's been nothing. Your 8 Honor -- please stop. There's been nothing from 9 the Depp team and nothing from Mr. Depp 10 whatsoever. 11 MS. BREDEHOFT: I understand, Your 12 Honor. And I can represent to the court 13 absolutely I had no idea. 14 MR. CHEW: She should have had an idea. 15 We told our client exactly what you said on 16 February 9th, and I said to Your Honor 17 "Absolutely. I understand. Mr. Depp 18 understands," and he's said nothing. 19 MS. BREDEHOFT: Mr. Depp has made many 20 statements to the press since February 9. 21 MR. CHEW: Don't dig deeper. 22 THE COURT: I'm going to reserve the	1 it if I approach the bench before asking the 2 jurors? I'm talking very short follow-up. 3 THE COURT: If they're short 4 follow-ups, that's fine. If I decide that they're 5 going a little lengthy, I will let you know. 6 MS. VASQUEZ: I understand, Your Honor. 7 I will keep it very short, just if there's a 8 follow-up necessary. 9 THE COURT: All right. 10 MS. VASQUEZ: Thank you. 11 THE COURT: Anything from 12 Ms. Bredehoff? 13 MS. BREDEHOFT: I'm sorry, Your Honor, 14 I didn't hear. 15 THE COURT: She just said that if she 16 had to do a little follow-up for voir dire, would 17 she just go to follow-up with some of the 18 questions, if that's okay, or should she approach. 19 MS. BREDEHOFT: I think it depends upon 20 the question. 21 THE COURT: I think it does. That's 22 what I already answered.

Transcript of Jury Trial - Day 1  
Conducted on April 11, 2022

13	15
1 MS. BREDEHOFT: Your Honor, we have --	1 it's going to be from now on.
2 THE COURT: I need you to use the	2 MS. LECARAZ: Good morning, Your Honor.
3 microphone for the court reporter. I'm going to	3 Rebecca Lecaroz.
4 try to start taking you into --	4 THE COURT: Lecaroz, can you spell that
5 MS. BREDEHOFT: It's good, it's going	5 for the court reporter too?
6 to be hard to do.	6 MS. LECARAZ: L-E-C-A-R-O-Z.
7 THE COURT: Good practice.	7 THE COURT: Lecaroz, all right. We can
8 MS. BREDEHOFT: I'll work on it. Your	8 go with that.
9 Honor, my understanding is that there might be	9 All right. And Ms. Bredehoff, your
10 people in the courtroom who are on the witness	10 client, and Mr. Nadelhaft and Mr. Rottenborn?
11 list. Could I just get an assurance from counsel	11 MS. BREDEHOFT: Yes.
12 for Depp that there is none?	12 THE COURT: Okay. I know those two
13 MR. CHEW: Your Honor, Mr. Bett is here	13 names. All right. Anything else before the jury
14 who's on the witness list, but -- oh, no, he's not	14 comes in?
15 here actually. I apologize.	15 MS. VASQUEZ: No, Your Honor. Thank
16 THE COURT: Okay.	16 you.
17 MS. BREDEHOFT: Thank you. I just want	17 THE COURT: No.
18 to make sure we don't have an issue before we	18 MR. CHEW: No, thank you, Your Honor.
19 start.	19 THE COURT: We're bringing in the jury.
20 THE COURT: You understand which rows	20 We're just going to do 1 through 60. Just
21 you get, right, for your row that -- the second	21 remember to use the numbers for me, okay?
22 row actually might be empty.	22 THE BAILIFF: When I call your Number,
14	16
1 THE BAILIFF: We thought it would be	1 please come forth and be seated. Number 1,
2 easier for the jurors for the voir dire --	2 Number 2, Number 3, come forward, please.
3 THE COURT: All right. I want to make	3 Number 4, Number 5, Number 6, Number 7, Number 8,
4 sure so I can introduce who's at your table today	4 Number 9, Number 10, Number 11, Number 12,
5 to the jury. All right. I want to make sure I	5 Number 13, and Number 14, Number 15, Number 16,
6 get your names right. Ms. Meyers, right? Okay.	6 17, 18, 19, 20, and 21, have a seat right here.
7 That man I know. Who else is in the back there	7 THE COURT: All right. Ladies and
8 for me?	8 gentlemen, if I could have all the potential
9 MS. ROBINETTE: Paulette Robinette.	9 jurors stand up and raise your right hands for me.
10 THE COURT: What's your last name,	10 (Whereupon, the oath was administered.)
11 ma'am?	11 THE CLERK: Please have a seat.
12 MS. ROBINETTE: Robinette.	12 THE COURT: Good morning, ladies and
13 THE COURT: Okay. Ms. Robinette.	13 gentlemen. My name is Judge Penney Azcarate, and
14 MS. KLEYNHANS: Amy Kleynhans.	14 I've been assigned to preside over this case.
15 THE COURT: How do you spell your last	15 You've been summoned as prospective jurors in this
16 name?	16 civil case. The name of this case is John C.
17 MS. KLEYNHANS: K-L-E-Y-N-H-A-N-S.	17 Depp II versus Amber Heard. The plaintiff is
18 THE COURT: And you say Kleynhans?	18 represented by his attorney Mr. Chew. Also the
19 MS. ROBINETTE: Kleynhans.	19 other attorneys today that he is represented by
20 THE COURT: Kleynhans?	20 are Ms. Meyers, Ms. Robinette, Ms. Vasquez,
21 MS. KLEYNHANS: Kleynhans.	21 Ms. Kleynhans, and Ms. Lecaroz, and I apologize
22 THE COURT: Kleynhans. That's what	22 for that if I did those name incorrectly.

Transcript of Jury Trial - Day 1  
Conducted on April 11, 2022

5 (17 to 20)

<p style="text-align: right;">17</p> <p>1 In addition the defendant and 2 counterclaimant is present as well, represented by 3 her attorney, Ms. Bredehoft, and also 4 Mr. Nadelhaft and Mr. Rottenborn are present today 5 also for the defendant. 6 Now, the case here involves claims and 7 counterclaims of defamation. Before we begin the 8 process of questioning you for purpose of 9 selecting the jury to hear the case, I want to 10 speak to you about some of the special protocols 11 that we have adopted in order to keep you safe 12 along with other individuals involved in the 13 trial. So in designing these protocols, we have 14 worked closely with the clerk of the court, the 15 sheriff and her deputies, and with the health 16 department, and we appreciate all the assistance 17 we have been provided. 18 As you know, the COVID-19 screening 19 signs outside the courthouse today were to ensure 20 that a juror who might be experiencing symptoms 21 who might otherwise place others at risk were 22 instructed not to enter the courthouse.</p>	<p style="text-align: right;">19</p> <p>1 have been created with cooperation and 2 consultation with the Fairfax County Health 3 Department, and having a fair and impartial trial 4 and your safety is my top priority. If at any 5 time during the proceedings you feel uncomfortable 6 or you need any clarification, please do not 7 hesitate to ask, and we'll take care of any issue 8 you may have. 9 So both the plaintiff and defendant 10 have a right to a trial by jury, and that's why 11 you're all here. I would like to say thank you 12 for coming here today, but I know you didn't have 13 much of a choice, but welcome regardless. Jury 14 service is not only a civic duty, but can be very 15 rewarding to not only take part in our legal 16 system but to play a pivotal role as well. We are 17 one of the few countries where a jury of peers 18 stands in judgment. We just couldn't do it 19 without you. As American citizens, we are 20 afforded many opportunities and benefits just by 21 being Americans. We also have responsibilities as 22 citizens, and doing our civic duty is one of them.</p>
<p style="text-align: right;">18</p> <p>1 This courtroom, the jury assembly 2 rooms, and the bathrooms will be thoroughly 3 cleaned each evening. The county has provided a 4 special cleaning team for that purpose. We have 5 provided hand sanitizer stations throughout the 6 courthouse, and in order to minimize necessity of 7 jurors sharing materials, we will provide each 8 juror with their own set of jury instructions at 9 end of case so that you will not need to share 10 those instructions. Gloves and hand sanitizers 11 will be provided for you to use in handling any 12 objects that may be admitted during the trial, and 13 once the trial begins, we'll ask you to sit in the 14 same seat in the jury box after each recess. 15 Masks are optional; however, I would 16 encourage those individuals who are not vaccinated 17 to wear a mask. Even if you are vaccinated, you 18 are welcome to wear a mask. Please be considerate 19 to all jurors and recognize we all have different 20 comfort levels as we progress out of this 21 pandemic, okay? 22 Now, all these policies and procedures</p>	<p style="text-align: right;">20</p> <p>1 No one is ever excited about it, but it's an 2 integral part of our judicial system, and I hope 3 you'll see it as an opportunity to be an active 4 part of this Constitutional right. 5 In addition, other citizens in this 6 country are wearing a uniform and away from their 7 families for years at a time, and we're not asking 8 that of you. We're just asking for your civic 9 duty for jury service, and I hope that you take it 10 seriously for me. 11 In addition, in this case particularly, 12 you may have noticed that there are cameras in the 13 courtroom. This trial will be televised; however, 14 jurors will not be televised at all, and selection 15 of the jury today is not televised, okay? There 16 is an overflow room where there are members of the 17 public watching today, but nothing is being 18 televised at this time. And in order to maintain 19 your privacy as much as we can, we will be using 20 numbers in addressing you today. So I would ask 21 that you just respond with numbers and no names 22 today as well.</p>

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

24283

Transcript of Jury Trial - Day 1  
Conducted on April 11, 2022

<p style="text-align: right;">21</p> <p>1 I will seal the names of the jurors 2 with this case that will be in the jury; however, 3 once the case is over, those names will no longer 4 be sealed, so I wanted to let you to know that 5 ahead of time, okay, when we're talking about this 6 particular case. All right? 7 Now, so voir dire today is going to be 8 a little differently. So bear with us because you 9 are going to be shuffled around a little bit 10 today, and I apologize in advance for that. Okay? 11 I'm going to ask you several questions concerning 12 your qualifications to serve on this jury. Please 13 listen to each question carefully, and if at any 14 time you prefer to answer a question at the bench 15 privately, just let me know, and we'll come up 16 here with just the attorneys so we can answer -- 17 or discuss your question or your answer, okay? 18 If you don't understand any question 19 asked, you can ask for a clarification. And just 20 remember we do have a court reporter here so that 21 we do have a microphone that we'll be able to take 22 around to get you so she can get every word down</p>	<p style="text-align: right;">23</p> <p>1 addition court is from 10:00 a.m. in the morning 2 to 5:00 p.m. at night each day. You will not be 3 sequestered, so you will go home every day. So 4 we'll begin at 10:00 a.m., concluded by 5:00 p.m. 5 Monday through Thursday. We'll take morning 6 breaks around 11:15 or 11:30, and we'll take 7 afternoon breaks around 3:15, 3:30, and then we'll 8 take a one hour for lunch from 1 to 2. So I just 9 want to give you all that information up front so 10 you know for your planning purposes what you may 11 have to deal with. 12 I recognize that the prospect of being 13 here for a trial of this duration will be 14 problematic for some of you. Everyone has work; 15 everyone has family and obligations. And we 16 recognize that you have upcoming appointments and 17 other obligations that you would need to 18 reschedule or cancel if you become a juror in this 19 case, but please understand, however, that we 20 cannot conduct this jury without jurors. So it's 21 vitally important that juries represent a fair 22 cross-section of the community; therefore, I may</p>
<p style="text-align: right;">22</p> <p>1 for you, okay? 2 All right. So one of the first 3 questions I just want to ask you all concerns 4 whether you should be excused for hardship based 5 on the expected duration of this trial and other 6 considerations. Now, the attorneys estimate that 7 evidence will require six weeks; which should 8 include deliberations. Because of a mandatory 9 judges conference that I have to attend, there 10 will be a one-week break in the middle of the 11 trial, okay? 12 So just to give you a little 13 perspective, this means Monday through Thursday 14 each week leading to Memorial Day weekend, we will 15 have trial except for one week in May. Okay. So 16 we don't have jury trials on Fridays, Saturdays, 17 and Sundays; it will just be Monday through 18 Thursday. The week in May that we will not have 19 trial is the week of May 9th to the 12th, so there 20 will be no court in this matter on those days. 21 There's -- again, no court on Fridays, 22 and so you don't have to report on Fridays. In</p>	<p style="text-align: right;">24</p> <p>1 not be able to excuse you from service as a juror 2 in this case if -- depending on your reason. So I 3 just want to let you know that ahead of time. 4 So if -- so that's my first question. 5 If you need a moment, this is the only 6 time I'll allow you to do, but if you need a 7 moment to check your phones, check your calendar 8 for the next six, seven weeks, I don't mind you 9 doing it if you just take it out for that limited 10 purposes only, or if you have a calendar, you want 11 to look to make sure you can be a juror in this 12 case for that duration, all right. 13 So if you want to take a moment to do 14 that, I'll give you that moment. 15 All right. So the question I'm going 16 to ask you, and if you just raise your hand to the 17 question, "Will service as a juror in this case 18 present a hardship for you that would make it 19 difficult or impossible for you to serve as a 20 juror for a trial of this duration?" And I'll 21 start over in the box. If you just keep your 22 hands up for me, and we'll just put -- let me just</p>

Transcript of Jury Trial - Day 1  
Conducted on April 11, 2022

7 (25 to 28)

25	27
1 get all the hands up.	1 Anybody have any objection since her daughter is
2 So we've got Number 1, Number 5,	2 having surgery?
3 Number 8, Number 9, Number 10, and Number 13.	3 MS. BREDEHOFT: No, Your Honor.
4 Okay. And why don't I just start with	4 THE COURT: Ms. Vasquez? Okay. All
5 the people in the box first, and then we'll go	5 right. You can have a seat in the far back of the
6 from there.	6 courtroom, please.
7 Okay. Number 1.	7 All right. Number 8, yes, sir.
8 Yes, ma'am. What's the reason?	8 JUROR NUMBER 8: Yeah. I have a
9 THE BAILIFF: She want to speak	9 vacation planned this week.
10 privately, Judge.	10 THE COURT: All right. Where are you
11 THE COURT: Okay. If you want to	11 going to?
12 approach the bench, you can do that.	12 JUROR NUMBER 8: (Indiscernible),
13 All right. Yes, ma'am. You can keep	13 Utah.
14 your voice down.	14 THE COURT: Okay. And is your -- your
15 JUROR NUMBER 1: Okay.	15 family vacation?
16 THE COURT: I couldn't tell if you're	16 JUROR NUMBER 8: Not family. It's a
17 on microphone or not.	17 friends (indiscernible).
18 JUROR NUMBER 1: I am a professional	18 THE COURT: Okay. And is it something
19 health care worker, and it was a hardship,	19 you've been planning for a while?
20 actually, today for them to find coverage for me.	20 JUROR NUMBER 8: Yeah. It's yearly.
21 THE COURT: Okay.	21 THE COURT: Okay. You have plane
22 JUROR NUMBER 1: Because we're short	22 tickets and everything ready to go?
26	28
1 staffed.	1 JUROR NUMBER 8: Yeah.
2 THE COURT: All right.	2 THE COURT: Okay. Anybody have an
3 JUROR NUMBER 1: And at the end of the	3 objection to going to Utah?
4 month is my last day. I put my termination in for	4 MS. BREDEHOFT: No.
5 retirement, so I'm selling my house and moving.	5 THE COURT: No? It looks like you're
6 THE COURT: Okay. All right. Does	6 going to Utah. Okay.
7 anybody have any objection for her to be off the	7 All right. Yes, ma'am.
8 jury panel? All right. Thank you, ma'am. You	8 JUROR NUMBER 13: Yes. I'm a preschool
9 can have a seat way back in the courtroom, okay?	9 teacher of a small church preschool, and it's just
10 JUROR NUMBER 1: Thank you.	10 a hardship for six weeks to be out.
11 THE COURT: Let me just go through them	11 THE COURT: Okay. It's a preschool.
12 all. Let me just hold on.	12 They couldn't get anybody to --
13 All right. Number 5. Yes, ma'am.	13 JUROR NUMBER 13: Not for six weeks.
14 JUROR NUMBER 5: My daughter's having	14 THE COURT: Okay. Does anybody have
15 surgery.	15 a --
16 THE COURT: I'm sorry.	16 MS. VASQUEZ: No, Your Honor.
17 JUROR NUMBER 5: My daughter is having	17 THE COURT: Okay. That's all right.
18 surgery.	18 Ma'am, you can have a seat in the back of the
19 THE COURT: Oh, she's having surgery?	19 courtroom. All right.
20 When's she having surgery?	20 Yes, sir?
21 JUROR NUMBER 5: This Thursday.	21 JUROR NUMBER 10: I have a financial
22 THE COURT: This Thursday. Okay.	22 hardship.

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

24285

Transcript of Jury Trial - Day 1  
Conducted on April 11, 2022

29	1 THE COURT: A financial hardship. Do 2 you work for yourself, sir? 3 JUROR NUMBER 10: I do not. I'm 4 employed by a company. 5 THE COURT: Excuse me? 6 JUROR NUMBER 10: I'm employed by a 7 company. 8 THE COURT: Well, the company has to 9 pay you for jury duty. 10 JUROR NUMBER 10: Two weeks. 11 THE COURT: They pay you for two weeks; 12 after that, they don't pay you for any more? 13 JUROR NUMBER 10: No. 14 THE COURT: Any follow-up question for 15 that? 16 MS. BREDEHOFT: Isn't that illegal? 17 THE COURT: Yeah, I think so. I think 18 they have to pay you. I can write you a letter. 19 JUROR NUMBER 10: Okay. 20 THE COURT: Okay? I think you're good. 21 We'll keep you on, okay? 22 JUROR NUMBER 10: All right.	31	1 JUROR NUMBER 17: I have three children 2 at home, and my husband is sick, so he cannot take 3 care of the kids so I have to be there. 4 THE COURT: He can't take care of the 5 kids? 6 JUROR NUMBER 17: He's sick. 7 THE COURT: Or he doesn't want to take 8 care of the kids? 9 JUROR NUMBER 17: I don't know. But 10 he's very sick today. I don't know. I don't know 11 if he has COVID or not. I didn't take a test yet, 12 but I don't know if that's going to happen. So 13 it's (indiscernible). 14 THE COURT: Okay. So you're concerned 15 about his health, and you might have issues with 16 that. All right. Anybody have issues with that? 17 MS. BREDEHOFT: I have no issue. 18 THE COURT: Okay. You can have a seat 19 in back of the courtroom. Thank you if you could 20 hand it to 19. 21 JUROR NUMBER 19: My company has an 22 annual meeting every May, and I'm part of the lead
30	1 THE COURT: Number 13. 2 JUROR NUMBER 9: I have two young 3 children. We both work -- my wife and I work 4 full-time. Our schedules don't align. And we 5 have limited childcare issues, and I also have 6 professional reasons, but I want to discuss it up 7 there. 8 THE COURT: Okay. That's fine. We can 9 just deal with the childcare. Any issue with the 10 childcare issue? 11 UNKNOWN SPEAKER: No, Your Honor. 12 THE COURT: No, that's fine. Childcare 13 is actually one that you could have done with 14 even -- not even had to be here. All right. 15 Thank you. 16 THE COURT: So if I could have 17 everybody in the courtroom that has a serious 18 conflict for handling a case with this duration, 19 if you could just stand for me, I think it would 20 be easier. All right. Let's do that. Okay. All 21 right. Just stay standing, okay, if you have a 22 hardship. All right. Start with number 17.	32	1 team on it and will be out at the end of May. 2 THE COURT: At the end of May? 3 JUROR NUMBER 19: In the last week 4 before Memorial Day. 5 THE COURT: Yeah. I'm not sure -- I 6 can't say for sure whether or not we'd be done by 7 that time. It's possible -- is that something 8 that you could miss? I mean, we all have 9 sacrifices and everything going on. 10 JUROR NUMBER 19: I guess, yeah. 11 THE COURT: All right. If you could 12 just stay put, I'd appreciate it. Thank you, 13 ma'am. 14 All right. Number -- well, that's 15 fine. We'll go in order. It's easier. 16 Number 59. 17 JUROR NUMBER 59: I have a family 18 vacation that's been planned, airline tickets, 19 rental car, hotel. 20 THE COURT: All right. Where are you 21 going to? 22 JUROR NUMBER 59: Norlin, South Dakota.

Transcript of Jury Trial - Day 1  
Conducted on April 11, 2022

<p style="text-align: right;">33</p> <p>1 THE COURT: Okay. Well, I think 2 vacations are on the list, so you're okay. If you 3 could have a seat in the back of the courtroom, 4 then, today we'll excuse you. Thank you, sir. 5 And, ma'am, I can't see your number. 6 I'm sorry. 58. Okay. Yes, ma'am. 7 JUROR NUMBER 58: I care for my elderly 8 mother. 9 THE COURT: Okay. I understand. 10 Anything else? 11 MS. BREDEHOFT: No objection. 12 THE COURT: Okay. That's fine, ma'am. 13 Thank you. Have a seat in the back of the 14 courtroom. 15 Number 24, is that correct? We're all 16 mixed up back there. That's fine. 17 JUROR NUMBER 24: Yes. Can I speak 18 privately? 19 THE COURT: Yes, ma'am, come on. 20 Approach. 21 JUROR NUMBER 24: Thank you. 22 THE COURT: 13 was excused.</p>	<p style="text-align: right;">35</p> <p>1 Would that accommodate you if we allow 2 you to stand and go from there? 3 JUROR NUMBER 23: I also have a hearing 4 problem. 5 THE COURT: Hearing, I can take care 6 of. I have extra things you can put in for your 7 ears. I want to make sure you had the chance to 8 serve. 9 JUROR NUMBER 23: Yeah. But I can't 10 sit for long. I have to stand up. 11 THE COURT: That's okay. And I'll 12 allow you to stand up if you're on the jury, okay? 13 Okay. You're fine, sir. Thank you. 14 Could you pass it to 22. 15 JUROR NUMBER 22: Good morning. It 16 would be a hardship for my job. 17 THE COURT: Okay. Could you be a 18 little more specific? 19 JUROR NUMBER 22: To be out that long. 20 THE COURT: Well, I understand. And 21 that -- I mean, we all have work and commitments, 22 and I know -- and I understand that will be a</p>
<p style="text-align: right;">34</p> <p>1 All right. Yes, ma'am. 2 JUROR NUMBER 24: I am currently 3 undergoing in vitro fertilization, so this week 4 I'm loaded up with hormones and -- 5 THE COURT: You had me at that; that's 6 fine. You can have a seat at the back. 7 All right. Number 24 is in the back of 8 the courtroom. 9 All right. And where did that leave 10 us? 11 THE BAILIFF: Number 23. 12 THE COURT: Number 23, thank you. 13 Number 23. 14 JUROR NUMBER 23: I can't sit long. I 15 have a blood circulation problem. 16 THE COURT: Okay. Well, we can 17 accommodate you. I mean if you have to stand in 18 the jury box, you can stand in the jury box 19 whenever you need to. You can sit down, and if 20 you need to take extra breaks, we can accommodate 21 that. I don't want you to think you can't serve 22 because of any health issues.</p>	<p style="text-align: right;">36</p> <p>1 hardship, but, yeah, I mean, you'll have the 2 evenings. You'll have Fridays, but I really can't 3 get you off the jury. 4 JUROR NUMBER 22: Especially with the 5 level of support that I provide, it would be hard 6 to have backup while I'm out, but if that's 7 something I can be considered for, then I would -- 8 THE COURT: We really need to keep you 9 on the jury at this point, the jury panel, okay? 10 JUROR NUMBER 22: Yes, ma'am. 11 THE COURT: All right. And then on 12 Fridays if you need extra time in the mornings and 13 things, you let me know, okay, if you're on the 14 jury. Okay? 15 PROSPECTIVE JUROR 22: Thank you very 16 much. 17 THE COURT: All right. Thank you. You 18 want to come forward, sir? Yes. Number 33. He 19 would like to approach the bench. 20 JUROR NUMBER 33: Number one, my family 21 and I have only one car at this time, and I have 22 to drive my son every day in the morning to</p>

37	1 school. 2 THE COURT: Well, that's okay. We 3 don't start until 10. 4 JUROR NUMBER 33: The one thing there. 5 Number two, I'm an IT director in the company. 6 There my company looking for me to join every day. 7 Six week is too big time for me not to be there. 8 I could have been there for two or three days. I 9 would love to be here, but six weeks is too big 10 time. 11 THE COURT: Well, all right. I mean, 12 your company has to understand what you're doing. 13 And so, I mean, you'll be there every Friday, but 14 I can't -- 15 JUROR NUMBER 33: Only on Fridays? 16 THE COURT: You're not here on Fridays, 17 yeah. 18 JUROR NUMBER 33: Yeah. But it's only 19 on Fridays. So for this thing, I need to come 20 every, like, every day, Monday through Thursday. 21 THE COURT: Right. That's right. 22 That's the jury service.	39	1 THE COURT: I'm sorry, sir. That's 2 just not a reason to excuse you from the jury. 3 JUROR NUMBER 36: Okay. 4 THE COURT: Okay. Thank you. He 5 stays. 6 Next we have number 38; is that 7 correct? 8 JUROR NUMBER 38: Yes, ma'am. 9 THE COURT: Okay. Yes, sir. 10 JUROR NUMBER 38: I would like to talk 11 privately also. 12 THE COURT: Come on up. 13 JUROR NUMBER 38: Good morning, ma'am. 14 THE COURT: Good morning, sir. 15 JUROR NUMBER 38: Actually, I have a 16 sister-in-law, she's suffering from blood cancer 17 in Florida, and we just came back from there. And 18 she's going through the bone marrow transplant. 19 So I have to take my other sister-in-law from 20 here -- 21 THE COURT: Down to Florida to take 22 care of her?
38	1 JUROR NUMBER 33: That's pretty big. 2 THE COURT: I understand that's big. 3 That's why we bring it up, but that's not a 4 hardship, sir, to get you off. Okay? 5 JUROR NUMBER 33: I -- I think my 6 company may kind of really think about some other 7 options. I've just been really promoted, they 8 went there. 9 THE COURT: I understand, but you have 10 to understand how a jury serves. It's very 11 important and a Constitutional issue, okay? All 12 right. You can go to your seat. Thank you. He 13 stays. 14 All right. And who's next? 36. 15 JUROR NUMBER 36: Can we speak 16 privately? 17 THE COURT: Okay. Sure. Come on up, 18 sir. Yes, sir. Good morning. That's okay. 19 JUROR NUMBER 36: It's a work situation 20 I have. I work for the federal government, only 21 two people in my office. I know in a couple 22 weeks, he will be out for two weeks, so...	40	1 JUROR NUMBER 38: So every week we are 2 going back and forth. 3 THE COURT: All right. You can have a 4 seat in the back of the courtroom. Thank you. 5 All right. I got number 60. 60, yes, 6 ma'am. 7 JUROR NUMBER 60: Yes. I work for a 8 foreign institution, and they don't have jury duty 9 compensation. And also I'm the head of the 10 household, so it's like a week I can take a 11 vacation. But if it's six weeks, it's a bit too 12 much. 13 THE COURT: I understand. But just 14 because of work, I can't get you off the panel for 15 that reason. What do you mean "head of the 16 household"? 17 JUROR NUMBER 60: Like, I'm the only -- 18 I'm the only one making the income, and I work for 19 a foreign institution. Like I work for an 20 embassy. 21 THE COURT: Okay. You work for the 22 embassy, they won't pay?

Transcript of Jury Trial - Day 1  
Conducted on April 11, 2022

41	1 JUROR NUMBER 60: They won't pay, no. 2 THE COURT: That probably is correct. 3 I want you to have a seat in the back of the 4 courtroom for the foreign embassy. I can't help 5 you with the foreign embassies. 6 All right. Let's see. Number 51. 7 JUROR NUMBER 51: Can I speak 8 privately? 9 THE COURT: Yes, sir. 10 Yes, sir. 11 JUROR NUMBER 51: So I'm a 12 self-employed person, so... 13 THE COURT: I understand. 14 JUROR NUMBER 51: So the business 15 pretty much cannot run if I have to be here for 16 six weeks. If it's going to be like a day or 17 two -- 18 THE COURT: Yeah. I know. I 19 understand. And I know it's a hardship, but it's 20 really not a basis for me to get you off the panel 21 on that. Hopefully on Fridays and the weekends, 22 you can get things done, and the evenings, but I	43	1 All right. 49. 2 JUROR NUMBER 49: Yes, Your Honor, I 3 also have smaller children and a childcare issue. 4 My wife and I both work and have opposing 5 schedules, and I -- I'm going to have a childcare 6 issue over a lengthy trial. 7 THE COURT: Okay. Do they go to the 8 daycare? Do they go to daycare or... 9 JUROR NUMBER 49: One gets there on his 10 own, but I walk the other one to school every 11 morning. He does not have daycare in the morning. 12 THE COURT: I understand, but we don't 13 start until 10, so what time does school start? 14 JUROR NUMBER 49: 8:30. 15 THE COURT: And does somebody need -- 16 are you there in the evening when he comes back? 17 Or... 18 JUROR NUMBER 49: Yeah. At 3 -- 3:30. 19 THE COURT: 3:30. You have to be there 20 at 3:30? 21 JUROR NUMBER 49: Yes. 22 THE COURT: Any objection?
42	1 just -- 2 JUROR NUMBER 51: But I, like, have it 3 every day. 4 THE COURT: You can do your work. 5 Okay? 6 JUROR NUMBER 51: Is it going to be 7 really six weeks? 8 THE COURT: Well, it's going to be six 9 weeks, but there's a one-week break in the middle 10 of it. It's actually seven weeks with a one-week 11 break in the middle of it. 12 JUROR NUMBER 51: Can it shorten? 13 THE COURT: There's always a chance. 14 I'm hopeful, but I can't guarantee you, though, 15 that, sir. It's not a basis to get you off, okay? 16 JUROR NUMBER 51: All right. Well, my 17 wife is pregnant. I have small kids too, like -- 18 THE COURT: I'm sure she stays at home 19 and takes care of them, correct? 20 JUROR NUMBER 51: Yeah. 21 THE COURT: Good try. All right. Go 22 ahead. That was 51, correct?	44	1 MS. BREDEHOFT: I have no objection. 2 MS. VASQUEZ: No objection. 3 THE COURT: All right. You can have a 4 seat in the back of the courtroom then, sir. 5 Number 46. 6 JUROR NUMBER 46: Yes, Your Honor. I 7 have a trip planned in two weeks to Sonoma, 8 California, to see my son. And then on May 7th, 9 I'm going to Budapest and Prague, nonrefundable 10 tickets. 11 THE COURT: Nice. Okay. I assume 12 there's no objection to that? 13 MS. BREDEHOFT: No objection. 14 THE COURT: You're not taking us with 15 you, but that's okay. You can have a seat in the 16 back of the courtroom. 17 JUROR NUMBER 46: Thank you, ma'am. 18 THE COURT: That takes care of the 19 right side. Now let's go over to the left side. 20 All right. Number 31. 21 JUROR NUMBER 31: Also because of my 22 job, if I can, like, short-term is okay, but I am

Transcript of Jury Trial - Day 1  
Conducted on April 11, 2022

45	<p>1 having to do multiple roles at work, so...</p> <p>2 THE COURT: I understand it's going to</p> <p>3 be a hardship at work, but they're just going to</p> <p>4 have to -- you're going to have to work around it,</p> <p>5 and they're going to have to work around. It's</p> <p>6 just not a reason to get you off the jury panel,</p> <p>7 okay?</p> <p>8 JUROR NUMBER 31: There's nobody to do</p> <p>9 my job.</p> <p>10 THE COURT: I understand. I</p> <p>11 understand. There's not much I can do about that.</p> <p>12 Okay?</p> <p>13 JUROR NUMBER 31: Okay.</p> <p>14 THE COURT: All right. Thank you.</p> <p>15 Number 30.</p> <p>16 JUROR NUMBER 30: I have a nephew who</p> <p>17 is autistic, so I interchange with his mother to</p> <p>18 take care of him. He doesn't take lightly to new</p> <p>19 people, so I don't know how this is going to work.</p> <p>20 THE COURT: All right. You take care</p> <p>21 of the child. How often do you take care of the</p> <p>22 child?</p>	47	<p>1 come, just so I can see exactly what that means?</p> <p>2 Yes, sir. I just want to know what</p> <p>3 kind of medical appointment.</p> <p>4 JUROR NUMBER 44: I need a blood draw</p> <p>5 on the April 13th because I went last time and --</p> <p>6 THE COURT: So it's just a blood draw</p> <p>7 you have to get?</p> <p>8 JUROR NUMBER 44: Yes, for liver</p> <p>9 function.</p> <p>10 THE COURT: Are you on dialysis?</p> <p>11 JUROR NUMBER 44: No.</p> <p>12 THE COURT: Okay.</p> <p>13 JUROR NUMBER 44: I'm on the, like,</p> <p>14 Lipitor.</p> <p>15 THE COURT: Okay.</p> <p>16 JUROR NUMBER 44: I had a problem with</p> <p>17 my liver, and doctor stopped medicine. And she</p> <p>18 said, "You need to come back in, like, 30</p> <p>19 months -- 30 days."</p> <p>20 THE COURT: That's fine.</p> <p>21 JUROR NUMBER 44: And that's April 13.</p> <p>22 That's the only day.</p>
46	<p>1 JUROR NUMBER 30: Like, three days a</p> <p>2 week, the mom goes to work. Then when I have to</p> <p>3 work, then she takes care of him.</p> <p>4 THE COURT: Okay.</p> <p>5 JUROR NUMBER 30: Also, he doesn't like</p> <p>6 new people.</p> <p>7 THE COURT: Any objection?</p> <p>8 MS. BREDEHOFT: No.</p> <p>9 MS. VASQUEZ: No objection.</p> <p>10 THE COURT: All right. You can have a</p> <p>11 seat at the back of the courtroom, ma'am. Thank</p> <p>12 you. That was 30.</p> <p>13 You can pass the microphone to -- sir,</p> <p>14 your number? Sorry, I can't see your number with</p> <p>15 your hand there.</p> <p>16 JUROR NUMBER 44: 44.</p> <p>17 THE COURT: 44? Yes, sir.</p> <p>18 JUROR NUMBER 44: Your Honor, I can't</p> <p>19 be here on April 13 because I have a medical</p> <p>20 appointment.</p> <p>21 THE COURT: Well, if you want to</p> <p>22 approach about medical appointment, why don't you</p>	48	<p>1 THE COURT: Is it local? Is it local?</p> <p>2 JUROR NUMBER 44: It's local in</p> <p>3 Rockville.</p> <p>4 THE COURT: Okay. So maybe we can work</p> <p>5 around your appointment time. Do you go in the</p> <p>6 morning? Is it in the morning, your appointment?</p> <p>7 JUROR NUMBER 44: 10.</p> <p>8 THE COURT: Maybe we can talk to the</p> <p>9 doctor to get it pushed up to 9 or something?</p> <p>10 JUROR NUMBER 44: No, no.</p> <p>11 THE COURT: Well, even if it's 10:00,</p> <p>12 we could work around that. You could come in by</p> <p>13 11?</p> <p>14 JUROR NUMBER 44: No. Because I need</p> <p>15 about two and a half hours.</p> <p>16 THE COURT: Two and a half hours?</p> <p>17 JUROR NUMBER 44: I can be here at one.</p> <p>18 THE COURT: That's something we can</p> <p>19 probably work through on that day if it came to.</p> <p>20 We can work through that. If you make it on the</p> <p>21 jury, we can work through that. We'll keep you on</p> <p>22 the panel, okay?</p>

49	51
1 JUROR NUMBER 44: Okay.	1 And you're number 55. Yes, sir.
2 THE COURT: Okay. Thank you. All	2 JUROR NUMBER 55: Yeah. Is it okay if
3 right. And next we have -- I'm sorry. Who has	3 I come up?
4 the microphone? Number 42.	4 THE COURT: Okay. Sure. Just hand the
5 JUROR NUMBER 42: Can you hear me?	5 microphone. Thank you.
6 THE COURT: There you go. I heard it	6 This way, sir. Oh, okay. That way,
7 that time. Yes, sir.	7 sir.
8 JUROR NUMBER 42: Yes, Your Honor. I'm	8 Yes, sir.
9 also taking care of my elderly mother. She just	9 JUROR NUMBER 55: I've got cancer. It
10 turned 91, and she's been taking some falls.	10 spread to my chest.
11 THE COURT: Okay. Anybody have any	11 THE COURT: I understand. Any
12 objection with that?	12 objection?
13 MS. BREDEHOFT: No.	13 MS. VASQUEZ: No.
14 THE COURT: Ms. Vasquez.	14 THE COURT: Good luck to you, sir,
15 MS. VASQUEZ: No.	15 okay?
16 THE COURT: Okay. You can have a seat	16 And, then, yes, sir. Could you turn
17 in the back of the courtroom.	17 your number around? I just can't see your number.
18 Number 4. Yes, sir.	18 JUROR NUMBER 54: Oh, I'm sorry.
19 JUROR NUMBER 4: Your Honor, I own and	19 THE COURT: The microphone's on. The
20 operate a small restaurant at the moment, and	20 number, there we go. 54. Okay. Thank you.
21 we're currently very short staffed, working seven	21 JUROR NUMBER 54: Can I come?
22 days a week at the moment.	22 THE COURT: Yes, sir. You just hand
50	52
1 THE COURT: I understand, sir. We all	1 the microphone to the deputy.
2 have the hardships with the work. I understand,	2 Yes, sir.
3 but it's just not a basis to get you off the	3 JUROR NUMBER 54: I have two reasons.
4 panel, okay? All right. Thank you.	4 One, I know the employer paid for jury duty, but
5 39.	5 we have a project that has been started -- already
6 JUROR NUMBER 39: Can I ask you in	6 started through end of this year, and I'm
7 person?	7 responsible for human resources, and I'm the only
8 THE COURT: Sure. You can come up.	8 one. I don't have any delegation.
9 Leave the microphone back there, though.	9 THE COURT: I understand.
10 Okay. Yes, sir.	10 JUROR NUMBER 54: That's why I'm
11 JUROR NUMBER 39: My mother had a	11 (indiscernible).
12 mastectomy, and I give her physical assistance for	12 The second reason, 23rd, 22nd April, so
13 three weeks. I don't know how -- nobody there to	13 we have already vacation planned with my Boy
14 help my mom.	14 Scouts.
15 THE COURT: So you stay at home and you	15 THE COURT: With the Boy Scouts, you're
16 help her?	16 going?
17 JUROR NUMBER 39: Yeah.	17 JUROR NUMBER 54: Yeah.
18 THE COURT: All right. Any objection?	18 THE COURT: For that one, you can have
19 MS. BREDEHOFT: No, Your Honor.	19 a seat in the back. All right.
20 MS. VASQUEZ: No.	20 Jamie, do you want me to go ahead and
21 THE COURT: Okay. You can have a seat	21 send those people back to the jury assembly room?
22 in the back. All right.	22 All right. So I think that takes care

<p style="text-align: right;">53</p> <p>1 of the first question. So all the people in the 2 back that were struck from the jury panel need to 3 go back to the jury assembly room for further 4 assignment, okay? So you're excused from this 5 courtroom, but just go back to the jury assembly 6 room because there's other trials going on. 7 All right. Did you want to fill up the 8 jury panel with 1 to 21 now? Let's go ahead 9 and -- let's just do it in the order that we lost 10 them. 11 What I'm going to do now is just fill 12 the jury panel of 1 to 21 back up before we go to 13 the next question. 14 THE BAILIFF: Juror number 22, please 15 come forward. 16 THE COURT: So Juror 22 will be in 17 number 1 spot. 18 THE BAILIFF: Juror Number 23, please 19 come forward. 20 THE COURT: Yes, sir, just come 21 forward. All right. Number -- for the record, 22 number 23 will be in the number 5 spot.</p>	<p style="text-align: right;">55</p> <p>1 impartial juror in this case. 2 So before I ask this question, I'll 3 give you some information about this case. So the 4 plaintiff, John C. Depp II, also known as Johnny 5 Depp, is suing Amber Heard, his former wife, for 6 defamation related to an op-ed that was published 7 in the Washington Post back in 2018. Ms. Heard is 8 suing Mr. Depp for defamation based on statements 9 published in various news sources. 10 Okay. So I will now turn to my first 11 question, and what I'd ask you to do is just raise 12 your hand if your answer is yes. Okay? So other 13 than the very limited information I provided to 14 you about this case, do any of you know anything 15 about this case? Now, not the parties in general. 16 For example, you may have seen the parties' movies 17 or other projects, but I am only concerned with 18 information about this particular case. By that, 19 I mean have you acquired any information about 20 this particular case from newspapers; television; 21 radio; Internet; blogs; social networking sites 22 like Facebook, Instagram, Snapchat, or Twitter; a</p>
<p style="text-align: right;">54</p> <p>1 THE BAILIFF: Juror number 25. 2 THE COURT: And for the record, Juror 3 Number 25 will be in the number 8 spot. 4 THE BAILIFF: Number 26. 5 THE COURT: Juror number 26 will be in 6 the 9 spot. 7 THE BAILIFF: Number 27. 8 THE COURT: Number 27 will be in the 9 13th spot. 10 THE BAILIFF: Juror number 28. 11 THE COURT: And Juror Number 28 will be 12 in the 17th spot. That's our panel of 21. 13 Thank you. All right. Now, that was 14 the first question, all right? Now, second 15 question I'm going to ask you -- and this is where 16 some of the shuffling is going to happen, okay? 17 So again, bear with me. All right. So the court 18 needs to determine whether you were familiar with 19 the case based on what you may have read, seen, or 20 heard about the case in the past. So then if you 21 have read something, we're going to ask you 22 whether it affects your ability to be a fair and</p>	<p style="text-align: right;">56</p> <p>1 Courthouse News article; or from any other source, 2 including from speaking to friends, family, 3 co-workers, or anyone else? 4 So just because you have does not 5 necessarily mean you don't qualify to sit on this 6 case. It just means we need to find out what you 7 know and if you can still be a fair and impartial 8 juror. So if you could just raise your hand if 9 you heard information about this case, and I'll 10 just write your numbers down. Okay. So we'll 11 start over here. We've got Juror Number 6, 7, 26, 12 and 10, 27, and 14. And actually if I can have 13 you guys stand up in the back, I'm sorry, I just 14 have trouble seeing the hands from here. Okay. 15 So we've got -- when I say your number, you can 16 sit down. 17 28, 19, 36, 34, 50, and 47 and 56. 18 All right. Did I catch everybody? All 19 right. So what we're going to do now is we're 20 going to ask those questions individually. So I'm 21 going to have everybody go back to the jury 22 assembly room. All right. And so we're going to</p>

Transcript of Jury Trial - Day 1  
Conducted on April 11, 2022

<p style="text-align: right;">57</p> <p>1 speak to the people that raised their hands 2 individually outside the presence of all the other 3 jurors. Now, before I do that, though -- did I 4 miss somebody? No. Okay. So before I do that, I 5 have an important instruction for you -- all of 6 you because now you're -- could be potentially the 7 jurors in this case, so this is your first 8 instruction. 9       So until and unless you have been 10 excused from further involvement in this case, I'm 11 going to instruct you as follows, all right? You 12 are not to read anything about this case from here 13 on out. Okay? So when you go back to the jury 14 assembly room, you cannot read about -- anything 15 about this case. You are not to watch anything 16 about this case. You are not to listen to 17 anything about this case. This applies to 18 television, newspapers, magazines, the Internet, 19 and any online sites. 20       Further, you are not to read, watch, or 21 listen to anything about this case on any social 22 networking site, such as Twitter, Facebook,</p>	<p style="text-align: right;">59</p> <p>1 your fellow jurors or potential jurors until you 2 have been authorized to engage in deliberations. 3 If at any time you inadvertently see, hear, or 4 read anything about this case or the persons 5 involved in the case or someone says something 6 about the case to you, you are to promptly advise 7 a deputy sheriff who will bring it to my attention 8 to decide how to proceed. You must not share any 9 communication or information you acquire with any 10 fellow juror or potential juror. 11       During the course of these proceedings, 12 you may find yourself in the elevator, the 13 restroom, the hallway, or the cafeteria with 14 individuals associated with this case. The 15 attorneys and litigants know that they cannot talk 16 to you. They are not being unfriendly; rather, 17 they are prohibited from talking to you. As to 18 others, if someone speaks to you about the case, 19 remove yourself from that encounter and report it 20 to one of the deputy sheriffs. 21       Now, many of you have automatic 22 notifications on your cell phones, iPads, or</p>
<p style="text-align: right;">58</p> <p>1 Instagram, Snapchat, or similar sites. In 2 addition, you must not communicate with anybody 3 about the case, whether in person, over the phone, 4 by email, text, or instant messaging, or by any 5 other electronic or nonelectronic devices. This 6 means when you go back to the jury assembly room, 7 don't start texting people about this case. All 8 right? I want to make sure you understand that. 9 This includes your friends, family, co-workers, 10 acquaintances, and also strangers. 11       I also instruct you that you cannot do 12 any research or make inquiries about this case, 13 whether online or by any other means. For 14 example, you cannot look up any information on the 15 Internet that is related to this case or related 16 to the persons involved in this case, nor may you 17 consult dictionaries or other reference materials. 18 What you learn about this case is limited to what 19 you learn in the four walls of this courtroom when 20 proceedings are underway. 21       You also may not communicate about this 22 case or the persons involved in this case with</p>	<p style="text-align: right;">60</p> <p>1 computers, in other words, notifications that pop 2 up or show up as a banner on your cell phone. 3 Some of these automatic notifications may contain 4 information about this case; therefore, in order 5 to ensure that you do not inadvertently become 6 aware of information about the case by seeing a 7 pop-up or a banner, you must disable any automatic 8 notifications from news sites or social media 9 sites including Twitter, Facebook, or similar 10 sites. 11       These instructions apply to you 12 immediately and will continue to apply to you 13 until such time as your involvement in this case 14 is over and you have been excused. Okay? So 15 therefore, at this time, I would ask all the 16 jurors to follow the sheriffs back to the jury 17 assembly room, and we'll be with you as soon as we 18 can. 19       And if Juror Number 6 would like to 20 stay, you're up first. Juror number 6. Okay. 21 You stay right there. Everybody else can go. 22       Okay. Juror Number 6.</p>

Transcript of Jury Trial - Day 1  
Conducted on April 11, 2022

16 (61 to 64)

<p style="text-align: right;">61</p> <p>1 All right. Yes, ma'am. 2 Yes, ma'am. Can you tell us what 3 you've heard about this case, this particular 4 case, what you know about this case? 5 JUROR NUMBER 6: Hi, Your Honor. Yes. 6 I just heard about it through, like, Instagram or 7 social media platforms. 8 THE COURT: Okay. And what exactly did 9 you hear? Or just in general, what do you know 10 about the case? 11 JUROR NUMBER 6: Just in general, that 12 there is some domestic violence going on, but I 13 haven't really read much into the details, just 14 the headlines. 15 THE COURT: Just the headlines. Do you 16 know anything else about the case? 17 JUROR NUMBER 6: Aside from the actors, 18 no. 19 THE COURT: Okay. All right. 20 Do the attorneys have any questions of 21 this juror? 22 MS. BREDEHOFT: When you say --</p>	<p style="text-align: right;">63</p> <p>1 can you put that aside and still just base your 2 information on being a juror on the information 3 you hear within this courtroom and still be a fair 4 and impartial juror? 5 JUROR NUMBER 6: Yeah. 6 MS. VASQUEZ: Do you believe that 7 domestic violence has occurred against Ms. Heard 8 by Mr. Depp? 9 JUROR NUMBER 6: I don't have a strong 10 opinion about what has or has not occurred. 11 Again, I haven't really been following that story. 12 MS. VASQUEZ: Have you developed any 13 opinion about whether that has occurred? 14 JUROR NUMBER 6: I can't personally say 15 that I have. 16 THE COURT: Okay. All right. That's 17 fine. 18 All right, ma'am, you can go to the 19 jury assembly room, and if we could get Juror 20 Number 7. 21 Does anybody have objection to 6? Is 22 there any objection on 6?</p>
<p style="text-align: right;">62</p> <p>1 THE COURT: Microphone. 2 MS. BREDEHOFT: I'll do this. 3 THE COURT: That's fine. I don't care 4 which microphone. 5 MS. BREDEHOFT: Thank you, Your Honor. 6 When you say that you know some 7 domestic violence is going on, what is your 8 understanding of that domestic violence? 9 JUROR NUMBER 6: From what I've read, 10 that it is to Ms. Amber Heard. That's all I know. 11 THE COURT: All right. Ms. Vasquez, do 12 you have any questions? 13 MS. VASQUEZ: Thank you, first of all, 14 for your honesty. Based on what you've read, do 15 you believe you've formed opinions that may make 16 you partial as a juror to serve on this case? 17 JUROR NUMBER 6: Like I said before, I 18 haven't really read much into it, just because I 19 tend not to read a lot into social media or the 20 press in regards to that sort of stuff. But I 21 just know of it. 22 THE COURT: So I guess the question is</p>	<p style="text-align: right;">64</p> <p>1 MS. VASQUEZ: Yes, we have an 2 objection, Your Honor. 3 THE COURT: What's the objection? 4 MS. VASQUEZ: That she's already formed 5 an opinion that the allegation occurred. 6 THE COURT: She said she hadn't formed 7 an opinion. 8 MS. VASQUEZ: Well, she said that 9 domestic violence had occurred in the relationship 10 based on reading -- I believe her exact statement 11 was -- she hadn't strong -- formed a strong 12 opinion based on what she had read, domestic 13 violence had occurred against Ms. Heard. 14 MS. BREDEHOFT: Then she said -- 15 Ms. Vasquez followed up and asked her if she had 16 formed any opinion, and she clarified and said no, 17 she thought she hadn't. 18 THE COURT: All right. And she said 19 she could put it aside and be fair and impartial, 20 so I'm going to overrule the objection. 21 All right. Number 7. 22 All right. Yes, ma'am. What we just</p>

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

24294

Transcript of Jury Trial - Day 1  
Conducted on April 11, 2022

17 (65 to 68)

65	1 need to know is what you've heard about this case 2 particularly. 3 JUROR NUMBER 7: That they're -- 4 they're not seeing each other, but they're saying 5 things that they're -- I'm sorry. 6 THE COURT: No, sure. Take your time. 7 JUROR NUMBER 7: They're accusing each 8 other of doing something. 9 THE COURT: Okay. And do you know what 10 that something is that they're accusing, or no? 11 JUROR NUMBER 7: Yeah, I think it was 12 lying, lying. 13 THE COURT: Okay. Do you know anything 14 else in particular? Or is this... 15 JUROR NUMBER 7: No. 16 THE COURT: Okay. Where have you heard 17 this? 18 JUROR NUMBER 7: Oh, that was on 19 television. 20 THE COURT: Just on television? Just 21 on the news? 22 JUROR NUMBER 7: Yeah.	67	1 case and make a fair and impartial decision? 2 JUROR NUMBER 7: I'll try to. 3 MS. BREDEHOFT: Do you believe you can? 4 JUROR NUMBER 7: (Indiscernible.) 5 THE COURT: All right. 6 MS. BREDEHOFT: I have no further 7 follow-up. Thank you. 8 MS. VASQUEZ: First of all, thank you. 9 I know this is difficult. So I just need to 10 understand. Do you have a general apprehension -- 11 have you formed a general apprehension or thinking 12 about this case, in particular, my client, 13 Mr. Depp? 14 JUROR NUMBER 7: Yes. 15 MS. VASQUEZ: And would you be willing 16 to share with us, generally speaking, what that 17 opinion or thinking is? 18 THE COURT: Ma'am, if you'd rather 19 approach the bench, we can do that. 20 MS. VASQUEZ: Yeah, that's fine. 21 Thank you, Your Honor. 22 THE COURT: That's fine.
66	1 THE COURT: Okay. Does anybody have 2 any questions? 3 MS. BREDEHOFT: As a result of what you 4 have read or heard on television, have you formed 5 any opinions? 6 JUROR NUMBER 7: Yes. 7 THE COURT: Okay. And what are those 8 opinions, ma'am? 9 JUROR NUMBER 7: That somebody's 10 telling the truth and someone's lying. 11 MS. BREDEHOFT: Have you made a 12 determination of -- have you decided already who's 13 telling the truth and who's lying? 14 THE COURT: You can be honest. It's 15 fine. You can be honest. 16 JUROR NUMBER 7: No, not really. 17 Because I don't know all the -- I don't know all 18 the details. I don't know -- I don't know the 19 actual -- the evidence. I don't know that. 20 THE COURT: Okay. 21 MS. BREDEHOFT: Would you be able to, 22 with an open mind, listen to the evidence in this	68	1 JUROR NUMBER 7: Because what I heard 2 and what I saw on the news, that it's -- 3 THE COURT: You just don't think you 4 can block it out. 5 JUROR NUMBER 7: I can't. Yeah, that's 6 right. I have a certain -- yeah, I have -- I do 7 have an opinion about something. 8 THE COURT: Understood, understood. 9 All right. That's fine, ma'am. We're going to 10 excuse you from this jury panel. All right? Have 11 a good day. Thank you for your honesty. I 12 appreciate it. 13 All right. So 7 is removed from the 14 jury panel. If you can, get juror 26. 15 All right. Yes, sir, so what 16 information have you heard about this case? 17 JUROR NUMBER 26: I've heard very 18 little, but some information about, I think, 19 domestic abuse and pictures and stuff like that. 20 THE COURT: Okay. Can you be a little 21 more specific? Or is that all you remember? 22 JUROR NUMBER 26: I saw something about

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

24295

Transcript of Jury Trial - Day 1  
Conducted on April 11, 2022

18 (69 to 72)

<p style="text-align: right;">69</p> <p>1 Photoshop, but not like I found information on 2 this. I didn't even know this was going on today. 3 THE COURT: Well, here you are. Where 4 did you hear this information? 5 JUROR NUMBER 26: I heard it briefly, 6 very briefly, on the news and then amongst people, 7 plus I was in the building earlier. 8 THE COURT: Okay. All right. Yes, 9 ma'am. 10 MS. VASQUEZ: First of all, thank you. 11 Thank you so much for being here, and thank you 12 for your honesty. 13 What was the source of the news that 14 you read or heard about? 15 JUROR NUMBER 26: I don't recall 16 exactly. It could have been Facebook. It could 17 have been, you know, just flipping through 18 channels. I don't normally focus on stuff like 19 that, so... 20 MS. VASQUEZ: Do you remember the first 21 time or the last time that you saw something 22 related to this case?</p>	<p style="text-align: right;">71</p> <p>1 JUROR NUMBER 26: Yeah. 2 MS. VASQUEZ: Thank you. 3 THE COURT: Yes, ma'am. 4 MS. BREDEHOFT: Sir, when you say that 5 there was Photoshop what was said specifically 6 about Photoshop? 7 JUROR NUMBER 26: Someone had 8 mentioned, like, Photoshopping of bruises or 9 something like that. That was all it was. It was 10 the only quick thing I overheard. 11 MS. BREDEHOFT: And this was in the 12 jury room -- 13 JUROR NUMBER 26: No, no. This was 14 when we were in line before we got badges and 15 everything, before we were briefed and orientated. 16 MS. BREDEHOFT: Were the other people 17 that were in the line, are they people that are 18 now on this jury panel? 19 JUROR NUMBER 26: I don't -- I'm not 20 sure. They would have been near me, I think, so I 21 don't think so. Yeah. The only reason it came up 22 is I guess someone saw a sign and like, "Oh, maybe</p>
<p style="text-align: right;">70</p> <p>1 JUROR NUMBER 26: As far as seeing, 2 weeks, I don't know, yeah. 3 MS. VASQUEZ: Weeks from today -- 4 JUROR NUMBER 26: Yeah. I didn't even 5 think about it until, you know, earlier, and then 6 I was like I think I did hear something about 7 that. 8 MS. VASQUEZ: And then if you don't 9 mind me asking, what did you hear today in the 10 courtroom? 11 JUROR NUMBER 26: Before we got our 12 badges, they just -- they mentioned the Photoshop 13 thing and stuff like that. I hadn't heard all 14 that before. 15 MS. VASQUEZ: What impressions, if any, 16 have you formed of Mr. Depp? 17 JUROR NUMBER 26: I just -- I try to be 18 pretty fair and honest. I don't think, like, I 19 have any, you know, bias either direction. 20 MS. VASQUEZ: Do you think, sitting 21 here today, if we produced evidence to you that 22 you can be a fair and impartial juror?</p>	<p style="text-align: right;">72</p> <p>1 this is it," and that's where it came up. 2 MS. BREDEHOFT: And just to the best of 3 your ability, can you tell me what was said, you 4 know, how it came to be, and then what was said 5 that led up to saying Photoshopping of the 6 bruises? 7 JUROR NUMBER 26: So someone mentioned 8 the sign. I think it was like, "Free Johnny," or 9 something like that, and I was like -- and then my 10 boss also texted me, "You know there's a case 11 going on today?" I didn't know anything about it 12 and it came up. And they're like -- you know, I 13 wasn't talking directly with them. I just 14 overheard conversation, but they were like, "Oh, 15 yeah. There was something about, like, abuse and 16 bruises and something about Photoshop." I don't 17 even know which direction it was in. I just heard 18 it briefly. I just wanted to be honest. 19 MS. BREDEHOFT: Okay. And the sign 20 "Free Johnny," was that someone holding the sign 21 outside the courtroom? 22 JUROR NUMBER 26: I'm not -- I mean, it</p>

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

24296

Transcript of Jury Trial - Day 1  
Conducted on April 11, 2022

19 (73 to 76)

<p style="text-align: right;">73</p> <p>1 sounded like it was across the street, but I 2 didn't see it myself, so... 3 MS. BREDEHOFT: Based on what was said 4 about the bruises and the abuse and the Photoshop, 5 have you formed any type of opinions? 6 JUROR NUMBER 26: No. Like I said, I 7 don't really know all the background, so I don't 8 believe so. 9 MS. BREDEHOFT: All right. Thank you 10 very much. 11 THE COURT: All right. Thank you. 12 Do attorneys want to approach? Maybe 13 we just do it this way so we can keep everything 14 moving. 15 Any objection? 16 MS. VASQUEZ: No objection. 17 MS. BREDEHOFT: I have two problems 18 here. There's the fact that there are signs 19 outside saying "Free Johnny." 20 THE COURT: I don't know what he's 21 talking about. 22 MS. BREDEHOFT: And the second is --</p>	<p style="text-align: right;">75</p> <p>1 All right. Number 10 is next. 2 THE COURT: Yes, sir. We just wanted 3 to know what information you have heard, okay? 4 JUROR NUMBER 10: Okay. Some general 5 stuff on the news. 6 THE COURT: Okay. 7 JUROR NUMBER 10: I know a little bit 8 about some of the litigation that's been taking 9 place, but general information. 10 THE COURT: Do you know any specifics 11 that you heard? 12 JUROR NUMBER 10: To specifics, no. 13 THE COURT: Nothing specific at all? 14 JUROR NUMBER 10: Not that I can 15 recall, no. 16 THE COURT: Okay. What news did you 17 see this case on? 18 JUROR NUMBER 10: Probably on Internet 19 stuff. 20 THE COURT: Just Internet on social 21 media? 22 JUROR NUMBER 10: I don't do social</p>
<p style="text-align: right;">74</p> <p>1 THE COURT: He said it's on the 2 sidewalk across from the courthouse. There's 3 nothing I can do. 4 MS. BREDEHOFT: So and the other -- the 5 second is that the jurors were discussing 6 Photoshop. 7 THE COURT: Yeah. I don't know what 8 he's talking about. We can discuss that too. And 9 that's something we can -- if you want to add that 10 to voir dire, I have no objection to that. But I 11 think he's fine right now. 12 MS. BREDEHOFT: Yeah. I will do that. 13 Just while we're up here, I object to 14 Ms. Vasquez saying, "Thank you for your service. 15 Thank you for your honesty." I don't think that's 16 appropriate. 17 THE COURT: That's fine. I don't have 18 a problem with that. Okay. Thank you. 19 All right, sir, you're still in the 20 jury panel, so if you could just have a seat back 21 in the jury assembly room, and we'll be calling 22 you back shortly, okay.</p>	<p style="text-align: right;">76</p> <p>1 media. 2 THE COURT: You don't do social media. 3 Okay. So just something on the Internet, on a 4 news site, website? 5 JUROR NUMBER 10: Google News. 6 THE COURT: Google News. Okay. On 7 Google news. How long ago did you see this 8 information? 9 JUROR NUMBER 10: I've seen it 10 periodically over the course of all the stuff 11 going on. 12 THE COURT: When's the last time when 13 you recall? 14 JUROR NUMBER 10: It's been a couple 15 weeks, probably. 16 THE COURT: Couple weeks ago, okay. 17 Does anybody have any questions, follow-up 18 questions? 19 MS. VASQUEZ: Very briefly. 20 THE COURT: Okay. 21 MS. VASQUEZ: First of all, thank you 22 very much and good morning. Anything that you've</p>

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

24297

Transcript of Jury Trial - Day 1  
Conducted on April 11, 2022

20 (77 to 80)

77	79
1 read specifically that would make it difficult for	1 JUROR NUMBER 27: No. I wasn't really
2 you to be a fair and impartial juror on this case?	2 part of the conversation. We were at a wedding
3 JUROR NUMBER 10: No.	3 with other people. I was kind of there. I just
4 MS. VASQUEZ: Thank you very much.	4 remember hearing "Johnny Depp," because -- hearing
5 MS. BREDEHOFT: Hello.	5 that name before.
6 JUROR NUMBER 10: Hi.	6 THE COURT: Okay. And how long ago was
7 MS. BREDEHOFT: When you read any of	7 the wedding?
8 these, did you form any opinions based on what you	8 JUROR NUMBER 27: It was this weekend.
9 were reading?	9 THE COURT: This past weekend? Okay.
10 JUROR NUMBER 10: I did not.	10 Anybody have any questions?
11 MS. BREDEHOFT: So, could you be	11 MS. VASQUEZ: Just very brief.
12 completely open-minded, fair, and impartial in	12 THE COURT: Okay.
13 reviewing the evidence and making a decision?	13 MS. VASQUEZ: Good morning.
14 JUROR NUMBER 10: Yes.	14 JUROR NUMBER 27: Good morning.
15 MS. BREDEHOFT: Thank you very much.	15 MS. VASQUEZ: And thank you very much
16 THE COURT: All right. Thank you, sir.	16 for being here. Do you recall whether your wife
17 You can have a seat back in the jury assembly	17 had any opinions whether Mr. Depp could prevail in
18 room, and we'll be right back with you.	18 this case?
19 All right. Number 27.	19 JUROR NUMBER 27: I don't really
20 All right. Good morning, sir.	20 remember the conversation, but I know that she is
21 JUROR NUMBER 27: Good morning.	21 a fan. But I don't really know anything about the
22 THE COURT: So we'd just like to know	22 case, like I said.
78	80
1 what information have you heard about this case.	1 MS. VASQUEZ: Are you a fan of
2 JUROR NUMBER 27: Yeah. So I don't	2 Mr. Depp?
3 know too much to be honest.	3 JUROR NUMBER 27: Not particularly.
4 THE COURT: Okay. That's fine.	4 I've seen some of his work, but I don't know too
5 JUROR NUMBER 27: I also don't want to	5 much about him or anything like that.
6 waste everyone's time. But I heard my wife	6 MS. VASQUEZ: Have you formed any
7 talking about Johnny Depp. I don't really know	7 opinions that you think --
8 the details of anything. But I just heard that	8 JUROR NUMBER 27: I don't --
9 defamations are hard to win. That's all I heard.	9 MS. VASQUEZ: -- would cause you to
10 I really don't even know what it's about. I just	10 be -- I'm sorry -- would cause it to be difficult
11 wanted to make sure that everyone knows.	11 for you to be a fair and impartial juror on this
12 THE COURT: Sure. I appreciate it. So	12 case?
13 you don't know any particulars at all?	13 JUROR NUMBER 27: No. Because I don't
14 JUROR NUMBER 27: Yeah. I -- I	14 really know anything about his personal life
15 honestly already forgot the name of the other	15 personally. I do think he's a good actor. That's
16 party.	16 pretty much all I know.
17 THE COURT: Okay.	17 THE COURT: All right.
18 JUROR NUMBER 27: I don't know really	18 MS. VASQUEZ: Thank you.
19 too much of the details of the people or the case	19 THE COURT: Yes, ma'am.
20 at all.	20 MS. BREDEHOFT: Good morning.
21 THE COURT: So this was just a	21 JUROR NUMBER 27: Oh, good morning.
22 conversation with year wife?	22 MS. BREDEHOFT: Do you think, based on

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

24298

<p style="text-align: right;">81</p> <p>1 the fact that your wife is a fan of Johnny Depp, 2 that that would in any way impact you on being 3 able to listen to the evidence and make a 4 determination -- I think it was your words -- of 5 what he may be in his personal life versus as an 6 actor? 7 JUROR NUMBER 27: Personally, I feel 8 that I'm a pretty -- I'm pretty good at separating 9 my own personal opinions or my wife's personal 10 opinions from decisions, but I can see how, you 11 know, that might play a factor. But I personally, 12 don't think it will. 13 MS. BREDEHOFT: When you say you can 14 see how it might play a factor, that it might 15 influence you subconsciously, are you thinking? 16 JUROR NUMBER 27: I mean, potentially 17 if she brings up something, I mean, I don't 18 have -- I mean, I don't think I'm allowed to tell 19 her anything about the case. 20 THE COURT: The court will instruct you 21 that you won't be able to discuss the case with 22 anybody.</p>	<p style="text-align: right;">83</p> <p>1 (indiscernible), I think to me I think he's 2 trying to be very candid, and I think he's saying 3 that could be an influence because his wife is a 4 fan and she can't be told (indiscernible). 5 THE COURT: I think now that he knows 6 that he can tell her he's on this trial and he 7 can't -- that he can't speak of it, I think it'll 8 be fine. I think he was afraid that he would 9 overhear something. I think we corrected that. 10 MS. BREDEHOFT: Okay. 11 THE COURT: Sir, you're still on the 12 panel, so if you have a seat in the jury assembly 13 room, we'll be calling you back in a moment, okay? 14 Number 14. 15 All right. Number 14. Yes, ma'am, 16 what have you heard about this case? 17 JUROR NUMBER 14: I haven't heard a 18 whole lot. 19 THE COURT: Okay. 20 JUROR NUMBER 14: But I had to raise my 21 hand. I advised my boss that I had to come in for 22 jury duty. She said, "Oh, my god. You are there</p>
<p style="text-align: right;">82</p> <p>1 JUROR NUMBER 27: Right. If I don't 2 tell her I'm part of this case, if she brings up 3 something in conversation with someone else while 4 I'm nearby, I don't want it to affect my 5 decisions. 6 THE COURT: Well, you can instruct her 7 that she can't discuss it with you. 8 JUROR NUMBER 27: Oh. Oh, I gotcha. I 9 can tell her that? 10 THE COURT: Yes. Absolutely. 11 JUROR NUMBER 27: Gotcha. 12 MS. BREDEHOFT: If it does come up and 13 it is said in your presence like it happened at 14 the wedding, do you think that might have any 15 impact? 16 JUROR NUMBER 27: No. 17 MS. BREDEHOFT: Okay. Thank you. 18 THE COURT: Do you want to approach? 19 Any objection to 27? 20 MS. VASQUEZ: No objection. 21 MS. BREDEHOFT: I do, Your Honor. I 22 think hesitancy when he said he couldn't</p>	<p style="text-align: right;">84</p> <p>1 for the" -- this particular trial. Then a few of 2 the co-workers started talking, and so that's -- 3 it wasn't anything major. 4 THE COURT: All right. What exactly 5 did they say? We just need to know. 6 JUROR NUMBER 14: That it was the 7 Depp/Heard case and that Mr. Depp was suing his 8 ex-wife for -- I think it was \$50 million for 9 defamation of character, and that it -- probably 10 asked, "Why would the trial be here inside Fairfax 11 County? The servers reside here, and it was a 12 Washington Post op-ed." Said that there may be 13 some celebrities witnesses, but like I said, it 14 wasn't, but I did hear something. 15 THE COURT: Okay. That's fine. Have 16 you heard anything on -- other than that 17 conversation, those conversations, have you heard 18 anything else online or the news or any other 19 source? 20 JUROR NUMBER 14: No. I don't -- I 21 don't watch the news anymore. 22 THE COURT: Okay. All right.</p>

Transcript of Jury Trial - Day 1  
Conducted on April 11, 2022

22 (85 to 88)

<p style="text-align: right;">85</p> <p>1 Follow-up questions. 2 MS. VASQUEZ: Good morning and thank 3 you very much for being here. Have you formed any 4 opinions that would make it difficult for you to 5 be a fair and impartial juror based on what you've 6 heard? 7 JUROR NUMBER 14: No. 8 MS. VASQUEZ: Okay. Well, thank you 9 very much then. 10 MS. BREDEHOFT: Good morning. 11 JUROR NUMBER 14: Good morning. 12 MS. BREDEHOFT: When your co-workers 13 were talking about it, did any of them express any 14 type of opinions about what the defamation was 15 about, who might be right, who might be telling 16 the truth, anything along that line? 17 JUROR NUMBER 14: No. It was just more 18 of an excitement about a Hollywood trial-type 19 attitude and all this and "You might get on this." 20 You know, it was just kind of that I think they 21 communicated that there was a lot of 22 back-and-forth and that it was a volatile</p>	<p style="text-align: right;">87</p> <p>1 JUROR NUMBER 28: I just seen a lot of 2 stuff in the press, like pictures, articles, stuff 3 like that. 4 THE COURT: Okay. What type of 5 pictures, articles do you recall seeing? 6 JUROR NUMBER 28: Just pictures of 7 Ms. Heard, and I've just read a lot of stories 8 about it. 9 THE COURT: Okay. And what have you 10 read in the stories? 11 JUROR NUMBER 28: I think it was 12 pictures of her, like, face. 13 THE COURT: Okay. And what exactly 14 have you heard? We need to know exactly what you 15 know. 16 JUROR NUMBER 28: Just that she been 17 hit in the face, like I saw pictures, allegedly. 18 THE COURT: Okay. Do you know anything 19 else about this case? 20 JUROR NUMBER 28: I don't think -- I 21 guess there was -- sorry. I don't know how much I 22 can say.</p>
<p style="text-align: right;">86</p> <p>1 relationship, I -- but they didn't go into detail. 2 And I knew enough about the law that I said, "La, 3 la, la, la, la," and walked away. 4 MS. BREDEHOFT: Well done. So do you 5 think that you would be able to listen with an 6 open mind to any evidence that's presented and 7 make a determination on what's -- in this Fairfax 8 courthouse -- 9 JUROR NUMBER 14: Yes, ma'am. 10 MS. BREDEHOFT: -- not Hollywood? 11 No objection. Thank you. 12 THE COURT: All right. Do the 13 attorneys want to come forward? 14 Thank you, ma'am. You're still on the 15 jury panel, so if you could have a seat in the 16 jury assembly room, we'll call you back in a 17 moment. 18 Number 28. 19 Yes, ma'am. We just want to make sure 20 we know what information you might know about this 21 case, okay? So if you could, let us know what you 22 know.</p>	<p style="text-align: right;">88</p> <p>1 THE COURT: I'll let you know. 2 JUROR NUMBER 28: Just I guess that 3 that was not real; it was just for a picture. 4 THE COURT: Okay. 5 JUROR NUMBER 28: And that's pretty 6 much it, just that. And then I did know there 7 was, like, ongoing things between them, but I 8 haven't followed it in a while, so it's probably 9 dated information. 10 THE COURT: Okay. How long ago do you 11 think was the last thing you read about this case? 12 JUROR NUMBER 28: Yeah. 13 THE COURT: How long ago? 14 JUROR NUMBER 28: Oh. I would say, 15 like, maybe a year or two. 16 THE COURT: A year or two ago? 17 JUROR NUMBER 28: Yeah. 18 THE COURT: All right. Follow-up 19 questions. 20 MS. VASQUEZ: First of all, good 21 morning and thank you very much for being here. 22 Please, we want you to speak candidly and openly.</p>

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

24300

89	1 I know it can be nerve-racking, but we very much 2 appreciate that. 3 Do you recall -- I know you said it's 4 been a bit since you saw something. Do you recall 5 the source of where you saw those pictures or read 6 something about this case? 7 JUROR NUMBER 28: No. I think it was 8 just the press, seen probably, like, an article to 9 go online. But, no, I don't remember the specific 10 outlet. 11 MS. VASQUEZ: And you did say the last 12 time you saw something was one or two years ago? 13 JUROR NUMBER 28: Yes. That was what I 14 spoke about, that's the last I heard. I didn't 15 even know that something was going on today. 16 MS. VASQUEZ: And when you saw -- you 17 said you saw pictures, I believe, of Ms. Heard's 18 face, did you see that with what appeared to be 19 injuries on her face? 20 JUROR NUMBER 28: Yes. 21 MS. VASQUEZ: Did you form any opinions 22 about, one way or another, whether those were in	91	1 MS. VASQUEZ: Thank you. 2 THE COURT: Okay. Yes, ma'am. 3 MS. BREDEHOFT: Thank you. So you 4 recall seeing pictures of bruises, and then you 5 recall sometime later somebody saying, "Oh, those 6 weren't real," something to that effect? 7 JUROR NUMBER 28: Yes. 8 MS. BREDEHOFT: Okay. When you saw the 9 pictures of the bruises, did you form any opinion 10 then? 11 JUROR NUMBER 28: No, not really. 12 MS. BREDEHOFT: Okay. When you heard 13 later or when you read later that somebody was 14 saying those aren't real, did you form an opinion 15 then? 16 JUROR NUMBER 28: I don't think I 17 formed a real opinion. I think it was just more 18 of a passing like, "Oh, I hope that's not true," 19 you know. But no, it was really more of just 20 passing information, no opinion formed either way. 21 MS. BREDEHOFT: This case will involve 22 photos, and so will you be able to look at the
90	1 fact injuries or something else? 2 JUROR NUMBER 28: No. Just the 3 information that came out later that suggested 4 that maybe those weren't real. But no, I didn't 5 form an opinion either way. That was just the 6 last piece of information that I saw about it. 7 MS. VASQUEZ: And when you say that you 8 saw something, that maybe those pictures or 9 injuries on those pictures weren't real, what was 10 the source of that? 11 JUROR NUMBER 28: I think it was just 12 something in the press. I don't even remember. 13 It didn't really register. 14 MS. VASQUEZ: All right. Is there 15 anything that you've read or heard -- I understand 16 it's been a number of years -- that would make it 17 difficult for you to be fair and impartial in this 18 jury? 19 JUROR NUMBER 28: I don't think so. 20 MS. VASQUEZ: Have you formed any 21 opinion about Mr. Depp or Ms. Heard? 22 JUROR NUMBER 28: No.	92	1 photos and then listen with an open mind to the 2 testimony relating to those photos and those -- 3 what was depicted in them with an open mind and 4 make a decision on what you see or hear in this 5 next six weeks? 6 JUROR NUMBER 28: Yes. 7 MS. BREDEHOFT: Okay. Thank you very 8 much. I appreciate it. 9 THE COURT: Any follow-up? 10 MS. VASQUEZ: May I approach? First of 11 all, I don't have an objection, Your Honor, but I 12 do have an objection to Ms. Bredehoft referring to 13 them as bruises. 14 THE COURT: That is fine. 15 MS. VASQUEZ: I would just prefer that 16 it be "an injury of some kind depicted." 17 THE COURT: That's good. I don't have 18 a problem with that. Does anybody have an 19 objection to her? She says she can be fair and 20 impartial. 21 MS. BREDEHOFT: No. 22 MS. VASQUEZ: No.

<p style="text-align: right;">93</p> <p>1 THE COURT: Okay. 2 All right. You're still on the jury 3 panel, ma'am. If you could have a seat in the 4 jury assembly room, we'll get back to you, 5 hopefully, in a few minutes, okay. 6 So, number 19. 7 Good morning, ma'am. 8 JUROR NUMBER 19: Good morning. 9 THE COURT: All right. So what we need 10 to know is just what information you have heard 11 about this case. 12 JUROR NUMBER 19: I read the article in 13 the Washington Post this morning. 14 THE COURT: Okay. So you saw the 15 article this morning in the Washington Post? 16 JUROR NUMBER 19: Yes. 17 THE COURT: Other than that article, 18 have you read anything else about this case or 19 heard anything about this case? 20 JUROR NUMBER 19: No, I've not. 21 THE COURT: No. Just the Post article 22 this morning?</p>	<p style="text-align: right;">95</p> <p>1 you know, I don't think I did. I just kind of 2 read it to understand what was happening, so... 3 MS. VASQUEZ: Okay. Did you have a 4 particular reason that you decided to read that 5 article? Did something draw you to it? Did you 6 know you were serving as a juror? 7 JUROR NUMBER 19: I saw a notification 8 yesterday, I guess, about it, you know, being in 9 Fairfax. I said "Oh, Fairfax is where I live," 10 so... 11 MS. VASQUEZ: Anything that you read 12 there that would make it difficult for you to be a 13 fair and impartial juror in this case? 14 JUROR NUMBER 19: I don't think so. 15 MS. VASQUEZ: I just noticed a bit of 16 hesitation. Is there anything that you think that 17 we need to know? No? 18 JUROR NUMBER 19: Not anything I -- I 19 read the article, I guess. It comes down to 20 money, so that's my opinion on it. I guess that's 21 the one thing I gleaned from it. 22 MS. VASQUEZ: And when you say it</p>
<p style="text-align: right;">94</p> <p>1 JUROR NUMBER 19: Correct. 2 THE COURT: Okay. 3 MS. VASQUEZ: Good morning and thanks 4 very much for being here. We very much appreciate 5 it. 6 Admittedly I haven't read the article 7 in the Washington Post. Do you mind telling me a 8 little bit about what you read and what you 9 understood from that article? 10 JUROR NUMBER 19: Basically it 11 described why the trial was here in Fairfax 12 County, that the op-ed was written in the 13 Washington Post, that the defendant is looking to 14 use something that says it was a general thing 15 about domestic abuse and not something particular 16 to the individual. That's kind of what I took 17 from it, and then it's obviously about money at 18 the end of the day, so... 19 MS. VASQUEZ: And based on what you've 20 read, did you form any opinions about either of 21 the parties? 22 JUROR NUMBER 19: I don't think so. I,</p>	<p style="text-align: right;">96</p> <p>1 "comes down to money" -- 2 JUROR NUMBER 19: Both parties have 3 lost financially because of this situation. 4 MS. VASQUEZ: And do you know what the 5 situation is? 6 JUROR NUMBER 19: Well, basically one 7 is saying bad things about the other, and it's 8 counter backwards, so, you know, going against 9 each other, so -- and because of those things they 10 said, there were lost opportunities for revenue 11 and future opportunities as well. 12 MS. VASQUEZ: Thank you very much. 13 Very much appreciate it. 14 JUROR NUMBER 19: Sure thing. 15 MS. BREDEHOFT: Good morning. 16 JUROR NUMBER 19: Good morning. 17 MS. BREDEHOFT: So when you say that 18 it's about money and they've lost different 19 opportunities and at the end of the day it's about 20 money, would that in any way influence you on 21 being conservative, if you will, in awarding money 22 if you found through the evidence that one of them</p>

Transcript of Jury Trial - Day 1  
Conducted on April 11, 2022

97	1 was entitled to be compensated? 2 JUROR NUMBER 19: Can you rephrase 3 that? 4 MS. BREDEHOFT: Yeah. I did a terrible 5 job on that. Thank you. Let me try that again. 6 Would you be able to have an open mind 7 and hear the evidence in this case and make a 8 determination about whether either of the parties 9 caused the other harm and be able to fairly 10 compensate them? 11 JUROR NUMBER 19: That, I don't know. 12 I guess the amount of money that's talked is 13 something that's not -- I've never personally 14 experienced so, therefore, I don't know. 15 MS. BREDEHOFT: It's Hollywood, right? 16 JUROR NUMBER 19: Yeah. 17 MS. BREDEHOFT: All right. Thank you 18 very much. 19 JUROR NUMBER 19: Sure. 20 THE COURT: I guess my question would 21 just be can you put what you've read in the Post 22 aside, and obviously not read anything else, and	99	1 you back in a few minutes, okay. 2 JUROR NUMBER 19: Certainly. 3 THE COURT: Back in the jury assembly 4 room. 5 36. 6 Good morning, sir. 7 JUROR NUMBER 36: Good morning. 8 THE COURT: All right. So what we just 9 need to know is what you know about this case, 10 what you've heard about this case, okay? 11 JUROR NUMBER 36: I've heard very 12 little. 13 THE COURT: Okay. What have you heard? 14 JUROR NUMBER 36: Actually, I looked it 15 up today just when I heard it was here in Fairfax 16 County. I wasn't sure why, you know, it would be 17 here. That's about all I know. 18 THE COURT: Okay. So what did you look 19 up? When you say you looked up, what did you look 20 up? 21 JUROR NUMBER 36: I didn't read it. I 22 just looked it up, Googled it, you know, Johnny
98	1 base your opinion of this case on the evidence 2 that you hear within the courtroom? 3 JUROR NUMBER 19: Certainly I can try, 4 yes. 5 THE COURT: You can try? 6 JUROR NUMBER 19: Yes. 7 THE COURT: All right. Thank you, 8 ma'am. Hold on. You can stay right there for a 9 second. 10 MS. VASQUEZ: I don't have an 11 objection, Your Honor. 12 MS. BREDEHOFT: I do. I think she's 13 very -- I feel there's a lot of hesitancy with 14 this juror. 15 THE COURT: There does appear to be a 16 little, I think so, about it, but I think that's 17 something -- I'll let her stay on right now, but I 18 think something we can flesh out on voir dire with 19 other questions that we have. 20 MS. VASQUEZ: I agree. 21 THE COURT: Ma'am, you're still part of 22 the panel. You can have a seat, and we'll call	100	1 Depp, and it came up, you know, Fairfax County. 2 THE COURT: Okay. And you did not read 3 the article? 4 JUROR NUMBER 36: No. 5 THE COURT: Or click on the article? 6 JUROR NUMBER 36: No, disinterested. 7 Now I'm interested. 8 THE COURT: Okay. So you didn't read 9 anything further than that? 10 JUROR NUMBER 36: No. 11 THE COURT: Do you have any other 12 information about this case at all? 13 JUROR NUMBER 36: No. No. 14 THE COURT: All right. Any questions? 15 MS. VASQUEZ: Very briefly. 16 THE COURT: Okay. 17 MS. VASQUEZ: Good morning and thanks 18 very much for being here this morning. 19 JUROR NUMBER 36: Sure. 20 MS. VASQUEZ: I just want to be sure 21 you feel that you can be a fair and impartial 22 juror on this case based on what you looked at

Transcript of Jury Trial - Day 1  
Conducted on April 11, 2022

26 (101 to 104)

101	103
1 today.	1 the jury assembly room, and we'll get back to you
2 JUROR NUMBER 36: Well, I didn't	2 in a moment.
3 really -- like I said, I didn't open it up.	3 All right. Number 34. 34.
4 Just -- I don't know, yeah.	4 Good morning, sir.
5 MS. VASQUEZ: Is that yes, you feel you	5 JUROR NUMBER 34: Good morning.
6 can be fair and impartial (indiscernible) for the	6 THE COURT: All right. So we just want
7 evidence in this case?	7 to know what you have heard about this case.
8 JUROR NUMBER 36: Yeah.	8 JUROR NUMBER 34: So when I found out
9 MS. VASQUEZ: Thank you.	9 that I was going to be here today, I saw that
10 MS. BREDEHOFT: Good morning.	10 there was a famous trial and there was a link to
11 JUROR NUMBER 36: Good morning.	11 the Washington Post article, and so I read that.
12 MS. BREDEHOFT: So when you said you	12 THE COURT: All right. You read the
13 looked it up, what did you -- do you remember what	13 Post article from yesterday or the day before?
14 your search terms were?	14 JUROR NUMBER 34: No. The Post article
15 JUROR NUMBER 36: Just his name.	15 that Ms. Heard wrote.
16 MS. BREDEHOFT: Okay. And so when you	16 THE COURT: You actually read the
17 heard it, you heard Johnny Depp was going to be	17 op-ed?
18 here?	18 JUROR NUMBER 34: Yes.
19 JUROR NUMBER 36: Yeah, uh-huh.	19 THE COURT: From 2018?
20 MS. BREDEHOFT: Okay. Okay. Did you	20 JUROR NUMBER 34: Yes.
21 have any thoughts about Amber Heard on that?	21 THE COURT: Okay. And have you read
22 JUROR NUMBER 36: No.	22 anything else?
102	104
1 MS. BREDEHOFT: Okay. And do you	1 JUROR NUMBER 34: No.
2 remember what the headline was?	2 THE COURT: That's all you read?
3 JUROR NUMBER 36: Oh, just that it was	3 JUROR NUMBER 34: Yes.
4 going to be here at Fairfax County Courthouse.	4 THE COURT: Okay. All right.
5 MS. BREDEHOFT: So do you even know	5 MS. VASQUEZ: Hi. Good morning. Thank
6 what the claims are?	6 you very much for being here today.
7 JUROR NUMBER 36: Not other than what	7 JUROR NUMBER 34: Good morning.
8 you -- from this morning --	8 MS. VASQUEZ: You said that -- did you
9 MS. BREDEHOFT: The judge said?	9 read Ms. Heard's op-ed today, this morning?
10 JUROR NUMBER 36: Right.	10 JUROR NUMBER 34: Yesterday.
11 MS. BREDEHOFT: So is there anything of	11 MS. VASQUEZ: Okay. And did you form
12 what you have seen or your curiosity or anything	12 any opinions after reading the op-ed?
13 else that would cause you not to have an open mind	13 JUROR NUMBER 34: I mean, I thought it
14 and be able to listen to the evidence in this case	14 was a very well-written opinion page. I don't know
15 and make a decision?	15 that I had any context to form an opinion beyond
16 JUROR NUMBER 36: I don't think so.	16 that.
17 MS. BREDEHOFT: Okay. Great. Thank	17 MS. VASQUEZ: When you say it was a
18 you.	18 very well-written opinion piece, did anything jump
19 THE COURT: All right. Any objections?	19 out at you about her allegations against my
20 MS. VASQUEZ: No.	20 client, Mr. Depp?
21 MS. BREDEHOFT: No.	21 JUROR NUMBER 34: No.
22 THE COURT: Sir, you can have a seat in	22 MS. VASQUEZ: Did you form any opinions

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

24304

105	107
1 as to whether Ms. Heard was telling the truth?	1 quick question for you. Based on reading the
2 JUROR NUMBER 34: I don't think so. I	2 op-ed that Ms. Heard wrote, did you form an
3 just read it as being an opinion about the ability	3 opinion that Mr. Depp should not be bringing a
4 of women to write about what had happened to them.	4 defamation case in light of that op-ed?
5 THE COURT: And when you say "women's	5 JUROR NUMBER 34: I -- no, I don't
6 right to talk about what's happened to them," is	6 think so.
7 that based on an opinion that Ms. Heard suffered	7 MS. VASQUEZ: You say you don't think
8 domestic abuse at the hands of Mr. Depp?	8 so. What do you mean exactly? Could you explain?
9 JUROR NUMBER 34: I didn't read that	9 JUROR NUMBER 34: I'm not sure that I
10 into it.	10 evaluated it in that much depth. I mean, I just
11 MS. VASQUEZ: Have you formed any	11 kind of read through it. I didn't really, you
12 opinions about Mr. Depp based on reading	12 know, think about, in depth, what the legal issues
13 Ms. Heard's op-ed?	13 were regarding it.
14 JUROR NUMBER 34: No.	14 MS. VASQUEZ: You mentioned a number of
15 MS. VASQUEZ: Have you formed any	15 times opinion piece. Do you believe that someone
16 opinions about Ms. Heard after reading the op-ed?	16 should be entitled to bring a defamation case
17 JUROR NUMBER 34: Just about her	17 because someone wrote an opinion piece?
18 ability to write.	18 JUROR NUMBER 34: Well, I mean, I guess
19 MS. VASQUEZ: And what is your opinion	19 a defamation is based on what somebody has said
20 about her ability to write?	20 about you. So depending on what the content is, I
21 JUROR NUMBER 34: Well, I just -- it	21 would say sure, yeah.
22 was a very well-written opinion piece.	22 MS. VASQUEZ: Thank you.
106	108
1 MS. VASQUEZ: Did you form any	1 THE COURT: Do you want to approach?
2 impressions about Mr. Depp after reading the	2 MS. VASQUEZ: I mean, I have some
3 op-ed?	3 objections to the fact that he's read the piece.
4 JUROR NUMBER 34: No.	4 THE COURT: That's going to be part of
5 MS. VASQUEZ: Do you think that, based	5 the instruction, yeah.
6 on reading the op-ed, it would be difficult for	6 MS. VASQUEZ: But he actually read it.
7 you to be fair and impartial?	7 And obviously we'll contend that (indiscernible)
8 JUROR NUMBER 34: No.	8 who actually drafted it.
9 MS. BREDEHOFT: Good morning. So	9 THE COURT: He doesn't know what he
10 when -- after you read the op-ed, did you have any	10 doesn't know. I don't think -- I mean the op-ed
11 understanding of what the claims were in this	11 was -- that's what the basis of it is. That is
12 case?	12 coming into evidence. At this point I don't think
13 JUROR NUMBER 34: No, I did not.	13 there's any issue, and again, you can parse it out
14 MS. BREDEHOFT: Okay. So is there	14 with voir dire. But I think it's okay.
15 anything about reading the op-ed or anything else	15 MS. VASQUEZ: Okay. Thank you.
16 you might have seen or heard, including this	16 THE COURT: Sir, you're still on the
17 morning, that cause you in any way not to have an	17 jury panel. But if you could, have a seat back in
18 open mind and to listen to the evidence and make a	18 the jury assembly room, okay, we'll get back to
19 determination?	19 you, okay? Thank you, sir.
20 JUROR NUMBER 34: No, I don't believe	20 Okay. Number 50.
21 so.	21 Good morning, sir.
22 MS. VASQUEZ: Sorry. Just one more	22 JUROR NUMBER 50: Good morning.

<p>109</p> <p>1 THE COURT: All right. What we need to 2 know, sir, is just what you have heard about this 3 case. That's all.</p> <p>4 JUROR NUMBER 50: Prior to, basically 5 what you said at the bench. When I came in this 6 morning, I saw the cameras out front, and when I 7 was sitting in the jury waiting room, I texted my 8 wife that, you know, there were cameras there and, 9 you know, something big must be going on.</p> <p>10 She texted me back said, "Oh, there's 11 the Depp trial." I remember I had heard something 12 about it. I don't pay attention to the 13 entertainment news or anything like that. And so 14 we kind of texted back and forth, and my wife had 15 a definite opinion; I don't. But I have a text 16 record that we discussed this, you know, two hours 17 ago. And I just want to be --</p> <p>18 THE COURT: So what did your wife say?</p> <p>19 JUROR NUMBER 50: She takes Mr. Depp's 20 side.</p> <p>21 THE COURT: Can you be specific? Can 22 you pull out your phone?</p>	<p>111</p> <p>1 be interesting."</p> <p>2 At that point I looked up a local news 3 story, Fairfax Patch, and they basically had what 4 you said. They did mention some potential 5 witnesses, and I mentioned to my wife that I read 6 that Elon Musk might be testifying, but no idea 7 why.</p> <p>8 And she said, "Wait. Are you there for 9 Depp?"</p> <p>10 And I said, "Could be. Don't know. 11 Looks like around a hundred people here. Probably 12 pull 40 or 50, and the lawyers will be down. 13 20 percent chance I might be here."</p> <p>14 My wife then says, "Amber is psychotic. 15 Johnny set up. No one ever looks at spousal abuse 16 when the man is victim. Tell them your wife 17 abuses you. LOL." And -- and then she says, 18 "Okay. This is a defamation lawsuit."</p> <p>19 I answered, "Yes. 50 million, what I 20 read in the article. Musk is supposed to testify. 21 I remember reading about it, don't remember any 22 details."</p>
<p>110</p> <p>1 JUROR NUMBER 50: Absolutely. I'll 2 read it to you.</p> <p>3 THE COURT: I appreciate it.</p> <p>4 JUROR NUMBER 50: Do you want me to do 5 the whole conversation? It's not a whole lot.</p> <p>6 THE COURT: Sure.</p> <p>7 JUROR NUMBER 50: Okay. So I texted 8 her when I got here this morning. I said, "Scads 9 of TV crews and looked like protesters out in 10 front of the courthouse."</p> <p>11 She said, "Jeez, I hope they're not 12 going to need you for weeks." She texted me back.</p> <p>13 She said, "Apparently Johnny Depp is there, but I 14 don't know if that's related."</p> <p>15 I said, "May be here for him. Doubt 16 it's anything to do with a new case."</p> <p>17 She asked me, "You couldn't tell what 18 they were protesting?"</p> <p>19 I said, "No. Group of young girls with 20 signs, maybe Depp fans, not protesters." I said, 21 "It's jury selection for the Depp trial today, 22 aye, yi, yi." I said, "Hell, I think that would</p>	<p>112</p> <p>1 She said, "I can't believe it. Depp is 2 58 years old. He's your peer."</p> <p>3 I said, "They've got a lot of cases 4 going on. No idea where I'll end up." And that 5 was it.</p> <p>6 THE COURT: All right. And you said 7 you had seen a Patch -- you linked to a Patch 8 article. Do you remember what that article said?</p> <p>9 JUROR NUMBER 50: I can pull that up.</p> <p>10 THE COURT: No. We don't need to pull 11 it up. I just want to know what you remember from 12 it.</p> <p>13 JUROR NUMBER 50: Just that they 14 mentioned a monetary figure. I think it was 15 48,000, I rounded it off to -- or 48 million, I 16 rounded it off to, you know, 50 when I talked to 17 my wife. And they mentioned potential witnesses, 18 and Musk just popped in my mind because he'd been 19 in the news all the time.</p> <p>20 THE COURT: All right. So it sounds 21 like your wife has, like you said, strong 22 opinions.</p>

113	1 JUROR NUMBER 50: She has strong 2 opinions, yeah. 3 THE COURT: All right. But if you're 4 on this case, I mean, obviously you have 5 conversation with your wife, but you couldn't have 6 any conversations about this case. 7 JUROR NUMBER 50: Correct. 8 THE COURT: Do you think that's 9 something she can abide to? 10 JUROR NUMBER 50: I think so. She 11 might ask. I wouldn't discuss it with her. 12 THE COURT: Okay. Questions? 13 MS. VASQUEZ: Good morning and thank 14 you. Thank you for being here. 15 JUROR NUMBER 50: Okay. 16 MS. VASQUEZ: We all appreciate it. 17 Do you think that you can follow the 18 court's instructions to not talk about this case 19 with your wife or anyone else should you serve as 20 juror? 21 JUROR NUMBER 50: Sure. 22 MS. VASQUEZ: Have you formed any	115	1 out, you know, where I feel the truth lies. 2 MS. VASQUEZ: And your wife's opinions 3 about the parties in this case, you feel strongly 4 that that wouldn't affect your ability to serve 5 and be fair and impartial; is that right? 6 JUROR NUMBER 50: I don't believe it 7 would. I wouldn't see any reason it would. 8 MS. VASQUEZ: Thank you. 9 THE COURT: All right. Yes, ma'am. 10 MS. BREDEHOFT: Good morning. 11 JUROR NUMBER 50: Good morning. 12 MS. BREDEHOFT: So your wife said, 13 "Amber's psychotic." Do you have any -- does your 14 wife frequently use that strong of language to 15 describe somebody? 16 JUROR NUMBER 50: She tends to 17 exaggerate. 18 MS. BREDEHOFT: Okay. 19 JUROR NUMBER 50: Oh, yeah. You know, 20 if there's a little bit of a chill in the house, 21 "It's freezing in here." Temperature goes up one 22 degree, "It's roasting in here." So, yeah.
114	1 opinions based on what your wife said to you this 2 morning about this case? 3 JUROR NUMBER 50: No. My wife is more 4 of a headline reader. I'm more of an article 5 reader. But, you know, her -- she's big into 6 entertainment and things like that. She watches 7 lots of movies; I don't. I'm kind of an 8 outdoorsman, a hunter and fisherman, you know, so 9 that sort of stuff, we -- we watch movies. She 10 tells me who the actors are. I mean, I recognize 11 very few, so... 12 MS. VASQUEZ: You say you're more of an 13 article reader. Is that fair -- is it fair to say 14 that, then, you could be fair and impartial in 15 listening to evidence mentioned in this case 16 should you serve as a juror? 17 JUROR NUMBER 50: Yeah. That's -- 18 that's how I interpret the news. I don't read one 19 article and say that's what it is. I look -- if I 20 read something in the news and it catches my 21 interest, I'll usually pull up three or four 22 different articles, just to dig into it to figure	116	1 It's -- she does. She uses superlative, both 2 positive and negative, in most of her 3 conversation. 4 MS. BREDEHOFT: And do you agree with 5 her when she says that if a man says a woman beat 6 him, then they never believe him? 7 JUROR NUMBER 50: I don't know that 8 it's true or not. 9 MS. BREDEHOFT: Okay. And when she -- 10 you know when she said, "Tell them that I have 11 beat you," or something along that line, "LOL," 12 was she -- did you get the impression she was 13 trying to get you off, that you need to have an 14 excuse to get off the jury? 15 JUROR NUMBER 50: I think she probably 16 would think that way, yeah. I do. She's not a 17 fan of me being on jury duty for six weeks. 18 MS. BREDEHOFT: Okay. Okay. And with 19 all of those strong opinions, if you sat here for 20 six weeks and you don't talk to her at all, do you 21 think she's going to forgive you for not talking 22 to her during those six weeks?

Transcript of Jury Trial - Day 1  
Conducted on April 11, 2022

117	119
1 JUROR NUMBER 50: Being nosy, she	1 one.
2 probably wouldn't like it, but I think she would	2 THE COURT: I -- from his wife, and I
3 understand.	3 agree with you. He seems very even keel at this
4 MS. BREDEHOFT: Okay. And if you came	4 time. I think he would be able to handle that
5 back at the end of that and you said, "You know	5 with the instructions. I think he would follow
6 what? Amber's not psychotic, and these things	6 the instructions of the Court dead on. So I think
7 happened and we found this way," and if it's	7 we'll (indiscernible), I think.
8 against Mr. Depp and for Amber, do you think your	8 Sir, you're still on the panel for now.
9 wife would hold it against you?	9 If you go back to the jury assembly room, we'll
10 JUROR NUMBER 50: No. My wife, she	10 call you back here shortly, okay?
11 exaggerates, but she's very intelligent. And so	11 JUROR NUMBER 50: Okay.
12 when you lay things out for her, you know, it's	12 THE COURT: All right. Number 47.
13 not like trying to say it to a child, but, you	13 Good morning, sir.
14 know, you lay out the facts, the facts speak	14 JUROR NUMBER 47: Hello.
15 perfectly for themselves.	15 THE COURT: What we need to know is
16 MS. BREDEHOFT: Have you had to do that	16 just what you've heard about this case.
17 before where your wife just has a strong opinion	17 JUROR NUMBER 47: I believe that it
18 of something, and you go and you look it up. You	18 involves domestic violence accusations. I heard
19 were saying, and you check it all out, and you go	19 there was a trial in London that resolved
20 back and go, "Wait a second. It's the opposite,"	20 recently. That's the main gist of it.
21 has that happened frequently with you -- with your	21 THE COURT: Okay. Well, more than the
22 wife?	22 gist of it, can you tell specifically what you've
118	120
1 JUROR NUMBER 50: I wouldn't say	1 heard?
2 frequently, but I'm sure we've had those kind -- I	2 JUROR NUMBER 47: I believe the London
3 can't think of any, you know, exact, you know,	3 trial was not in favor of Mr. Depp and partially a
4 examples. But, yeah, I mean, we've had	4 continuation of trying to resolve it in his favor.
5 discussions of political matters and stuff like	5 THE COURT: Okay. And where did you
6 that.	6 see this information?
7 MS. BREDEHOFT: Okay. And has there	7 JUROR NUMBER 47: On the Internet.
8 ever been a time when you disagree with her and	8 THE COURT: On the Internet. You don't
9 you say, "Wait, wait, wait," that she stubbornly	9 remember particularly where? Was it on social
10 holds it anyway or gets mad at you?	10 media platform?
11 JUROR NUMBER 50: Well, gets mad at me	11 JUROR NUMBER 47: It was on Facebook.
12 all the time. But, yeah, no. I don't think we	12 THE COURT: It was on Facebook. Okay.
13 hold grudges against each other on things like	13 How recently have you seen these?
14 that.	14 JUROR NUMBER 47: Just last week.
15 MS. BREDEHOFT: Okay. All right.	15 THE COURT: Just last week. Okay. You
16 Thank you very much.	16 don't remember specifically what news article from
17 JUROR NUMBER 50: Uh-huh.	17 Facebook?
18 THE COURT: All right. Do you want to	18 JUROR NUMBER 47: I believe it was a
19 approach? Any objection?	19 link from the New York Times.
20 MS. VASQUEZ: No objection.	20 THE COURT: Link from the New York
21 MS. BREDEHOFT: I do have an objection	21 Times? Okay. Based on that information that
22 on his really rather strong phraseology on that	22 you've heard, have you -- do you think that you

Transcript of Jury Trial - Day 1  
Conducted on April 11, 2022

31 (121 to 124)

121	<p>1 could be fair and impartial and just decide this 2 case within the four walls of this courtroom? 3 JUROR NUMBER 47: Yes, ma'am. 4 THE COURT: All right. Questions. 5 MS. VASQUEZ: Good morning. Thank you 6 very much for being here. And thank you for your 7 honesty. 8 When you said you heard or read that 9 the London trial was resolved recently, did you 10 read anything else specifically about that? 11 JUROR NUMBER 47: I didn't. 12 MS. VASQUEZ: And when you read that it 13 didn't go in Mr. Depp's favor, again, did you read 14 anything specifically about that? 15 JUROR NUMBER 47: Just the article was 16 mentioning that it was not a jury trial, and they 17 preferred a jury trial. 18 MS. VASQUEZ: I'm sorry. When you say 19 "would prefer a jury trial," who would prefer or 20 what would be preferred about a jury trial? 21 JUROR NUMBER 47: The article implied 22 Mr. Depp would prefer a jury trial.</p>	123	<p>1 decision was not resolved in Mr. Depp's favor, but 2 this is a continuation, I think you said. 3 What did you mean by that? 4 JUROR NUMBER 47: I guess I would say 5 that either the -- neither individual's names are 6 completely clear, that it has cost both of them 7 work, and they hope to resolve favorably in one or 8 the other's favor so that their careers go on. 9 MS. BREDEHOFT: Okay. Do you think you 10 would be able to keep an open mind and listen to 11 the evidence in this case and make a fair and 12 impartial decision? 13 JUROR NUMBER 47: Yes. 14 MS. BREDEHOFT: Okay. Thank you. 15 THE COURT: No objection? 16 MS. VASQUEZ: No objection. 17 MS. BREDEHOFT: No. 18 THE COURT: All right. Sir, you can 19 have a seat back in the jury assembly room, and 20 we'll be calling you back shortly, okay? 21 And number 56. 22 Good morning, ma'am. You can sit down.</p>
122	<p>1 MS. VASQUEZ: And when you said that 2 the article implied that Mr. Depp was trying to 3 resolve the maybe negative London trial with this 4 lawsuit, did you form any opinions about 5 Mr. Depp's ability to have his day in court here 6 in the United States? 7 JUROR NUMBER 47: I did not, no. 8 MS. VASQUEZ: Based on the fact that 9 the article reported that the London trial didn't 10 go in Mr. Depp's favor, did that cause you to form 11 any opinions about his chances in this courtroom? 12 JUROR NUMBER 47: No. 13 MS. VASQUEZ: Do you believe that you 14 can be fair and impartial after listening to all 15 the evidence? 16 JUROR NUMBER 47: I do. 17 MS. VASQUEZ: Thank you very much. 18 MS. BREDEHOFT: I get to go too. 19 JUROR NUMBER 47: Okay. 20 MS. BREDEHOFT: Don't go anywhere yet, 21 but I'll only ask you a couple questions. 22 You understood the London court</p>	124	<p>1 So what we need to know is just what 2 you've heard about this case. 3 JUROR NUMBER 56: Just general 4 high-level information, just that there is 5 dispute, obviously, between the parties. Spoken 6 with this about my daughter. She's a 16-year-old, 7 so of course she has opinions about this. But 8 just broad stroke, good, bad, just not a lot of 9 detail, to be honest. 10 THE COURT: Okay. Where did you see 11 this information? Just from your 16-year-old 12 daughter? 13 JUROR NUMBER 56: Yeah. 14 THE COURT: Okay. That's the only 15 source of your information? 16 JUROR NUMBER 56: Pretty much, yeah. 17 THE COURT: Okay. So what -- can 18 you -- just give me specifically what she said, 19 can you tell us what she said? 20 JUROR NUMBER 56: She was going into a 21 little bit of detail about what was going on about 22 Ms. Heard accusing Mr. Depp of -- I don't even</p>

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

24309

Transcript of Jury Trial - Day 1  
Conducted on April 11, 2022

32 (125 to 128)

125	1 know the details, but I think something was 2 thrown. It was abusive language, potentially, 3 emotional abusive. But ultimately we didn't know 4 what the outcome really was because we didn't have 5 the information, the full information and how it's 6 portrayed in the press is not necessarily what's 7 real. So... 8 THE COURT: And that's it? She didn't 9 get any more specific than that? 10 JUROR NUMBER 56: No. 11 THE COURT: And when was this 12 conversation? 13 JUROR NUMBER 56: A year ago, year and 14 a half ago. 15 THE COURT: A year ago. And you 16 haven't seen anything else online or any news 17 articles or anything else on it? 18 JUROR NUMBER 56: Nope. 19 THE COURT: Okay. All right. 20 Questions? 21 MS. VASQUEZ: Good morning. Thank you 22 very much for being here.	127	1 difficult for you to be fair and impartial on this 2 jury? 3 JUROR NUMBER 56: No. 4 MS. VASQUEZ: And do you think you 5 could follow the Court's instructions to not speak 6 with your daughter should you be chosen as a 7 juror? 8 JUROR NUMBER 56: I could, yes. 9 MS. VASQUEZ: Thank you. 10 THE COURT: Yes, ma'am. 11 MS. BREDEHOFT: Good morning. 12 JUROR NUMBER 56: Good morning. 13 MS. BREDEHOFT: Daughters can be 14 interesting. 15 JUROR NUMBER 56: They can, yeah. 16 MS. BREDEHOFT: And they can definitely 17 be opinionated. 18 JUROR NUMBER 56: She certainly is, 19 yes. 20 MS. BREDEHOFT: So, when you said, you 21 didn't know the outcome, what do you mean? 22 Outcome of what?
126	1 You said you spoke to your daughter 2 about a year ago about the allegations. 3 JUROR NUMBER 56: Yep. 4 MS. VASQUEZ: And maybe I 5 misunderstood. I think you said your daughter had 6 some opinions about it. 7 Did she express an opinion one way or 8 the other about Mr. Depp? 9 JUROR NUMBER 56: It went both ways. 10 She can see both sides, basically -- so no 11 conclusion (indiscernible) essentially. 12 MS. VASQUEZ: Sounds like a smart girl. 13 JUROR NUMBER 56: She is. 14 MS. VASQUEZ: Do you recall what she 15 said about -- specifically about Mr. Depp? 16 JUROR NUMBER 56: I don't, no. 17 MS. VASQUEZ: And how about the same 18 question about Ms. Heard? 19 JUROR NUMBER 56: No. 20 MS. VASQUEZ: Based on what your 21 daughter said in that conversation -- I gather it 22 was a year ago -- do you think that it would be	128	1 JUROR NUMBER 56: The outcome of what 2 really happened. 3 MS. BREDEHOFT: Got it. 4 JUROR NUMBER 56: And that's hard to 5 know, right? 6 MS. BREDEHOFT: And, in fact, that's 7 why we have jury trials. So would you be able to 8 just keep an open mind through this trial, 9 notwithstanding anything you discussed with your 10 daughter a year ago? 11 JUROR NUMBER 56: Of course. 12 MS. BREDEHOFT: And you will listen to 13 the evidence and come to a fair and impartial 14 conclusion? 15 JUROR NUMBER 56: Yes. 16 MS. BREDEHOFT: Okay. Thank you very 17 much. 18 THE COURT: Ma'am, you're still on our 19 jury panel, so if you could have a seat back in 20 the jury assembly room, we'll get back to you, 21 okay? 22 I'm just checking. From my

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

24310

Transcript of Jury Trial - Day 1  
Conducted on April 11, 2022

33 (129 to 132)

129	1 calculations, we still have 41 on this particular 2 jury panel; is that correct? Does everybody else 3 have the same number, 41? Okay. So there's two 4 ways we can go from here. We have 41. I still 5 have 40 other jurors waiting. We can either do 6 those same two questions with the other 40 jurors 7 if you don't think 41 is going to be enough for 8 our jury panel. I think those two main questions, 9 I think 41 will be enough to get us to 11. I can 10 keep the other 40 in reserve, so I won't let them 11 go today. We'll keep going until we get a jury 12 panel. But I don't think I need to bring those 40 13 in to go through those two questions at this 14 point. Does everybody kind of agree with that? 15 MS. BREDEHOFT: I would be inclined to 16 agree with that. 17 THE COURT: You agree with that? 18 MS. VASQUEZ: We agree. 19 THE COURT: Oh, you agree too. Good. 20 All right. So we'll keep them on reserve. Now, 21 for the jury panel we have now, the 41 people we 22 have, the next option we can do is it's noon. I	131	1 Please be seated and come to order. 2 THE COURT: Court's at 1? 3 MS. BREDEHOFT: Excuse me? 4 THE COURT: Court's at 1, right? My 5 time. 6 All right. Let's continue. 7 MR. CHEW: Thank you, Your Honor. 8 THE COURT: I understand there's one 9 juror, Juror Number 32, who now says she has a 10 hardship. I was going to bring her in first and 11 then we can move on from there, okay? 12 MS. BREDEHOFT: Okay. Thank you, Your 13 Honor. 14 THE COURT: All right. Make sure 15 everyone is on time. 16 MR. CHEW: We will, Your Honor. We 17 apologize. 18 THE COURT: Would you like to approach 19 the bench, ma'am? That's fine. 20 JUROR NUMBER 32: If I start crying, 21 After lunch, I thought about it. I don't think 22 that I could handle this, I am overwhelmed because
130	1 can go ahead and let them have lunch until 1, and 2 then we could come back at 1 and start our voir 3 dire at that time so we don't have to break it up. 4 Is that -- 5 MS. BREDEHOFT: I think that makes 6 sense. 7 THE COURT: Okay. Is that good for 8 everybody? 9 MS. VASQUEZ: Right. 10 THE COURT: All right. So let's go 11 ahead and do that. You can release all the jurors 12 until 1:00, but they need to be back in the jury 13 assembly room at 1 so we can bring them back in 14 here. Okay? Make sure they understand my 15 instruction about discussions and talking, okay? 16 All right. Thank you very much. All right. So 17 we'll take a recess until 1. Is that fine? All 18 right. Thank you. 19 MR. CHEW: Thank you, Your Honor. 20 (Recess taken from 11:59 a.m. to 21 1:00 p.m.) 22 THE BAILIFF: All rise.	132	1 I just got off of two years coming from Chicago 2 caring for my mother, and then I had to clean her 3 hoarder house in Dallas, and now my health is 4 failing. I'm 68. 5 THE COURT: Okay. 6 JUROR NUMBER 32: And I have to buy a 7 house because I have, like, 30 stairs up to my 8 bedroom. 9 THE COURT: Okay. 10 JUROR NUMBER 32: And you know how 11 houses are now. Yeah, so I've got to sell my 12 house and buy another house. 13 THE COURT: Okay. 14 JUROR NUMBER 32: So, I don't think I 15 could do this six weeks. 16 THE COURT: All right. 17 JUROR NUMBER 32: I've still got two 18 months left on being executer and trustee for her 19 account with four other siblings of only one who 20 helps me do all this. So, I don't think I can do 21 this. 22 THE COURT: You've got too much on your

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

24311

Transcript of Jury Trial - Day 1  
Conducted on April 11, 2022

133	1 mind going on, you wouldn't be able to focus on 2 the trial. I understand. 3 JUROR NUMBER 32: I don't want to have 4 a stroke because of the stress. 5 THE COURT: I don't think there's any 6 objection, ma'am. You're free to go, ma'am. Just 7 go back to the jury assembly room, okay? 8 JUROR NUMBER 32: Okay. Thank you. 9 THE COURT: All right. 10 So, Juror 32 is out. 11 I want to remind everybody that court 12 starts at 1. When I say court starts at 1, court 13 starts at 1. 14 MR. CHEW: Understood, Your Honor, 15 thank you. 16 THE COURT: All right. So are we ready 17 for the jury panel to come back? 18 MS. BREDEHOFT: Yes, Your Honor. 19 THE COURT: I think there's one juror, 20 Number 7 was taken off, so we are going to have to 21 move a juror up. 29 will be placed in Number 7's 22 spot, okay? And then we'll have our panel -- 2.	135	1 JUROR NUMBER 29: I am. 2 THE COURT: All right. Number 2, do 3 you wish to approach the bench? 4 JUROR NUMBER 3: I did. 5 THE COURT: Number 3. You were close. 6 All right, Number 3, approach, sir. 7 Yes, sir. 8 JUROR NUMBER 3: I called my manager 9 and they said they're only reimbursing me for, 10 like, up to two weeks of jury duty. 11 THE COURT: Who is your manager? 12 JUROR NUMBER 3: I work for a company 13 called Navesta (phonetic); they say they can only 14 reimburse me for two weeks. 15 THE COURT: We can get you a letter 16 because that's not right. They have to reimburse 17 you for the full time you're on jury duty. 18 JUROR NUMBER 3: Okay. 19 THE COURT: I'll get you a letter about 20 jury service if you need it for that, okay? 21 JUROR NUMBER 3: Okay. Is there 22 anything I can do in the event I don't get
134	1 Juror Number 2 would like to speak. 2 Bring Juror Number 2 in. 3 (Whereupon, the jury entered the 4 courtroom and the following proceedings took 5 place.) 6 THE BAILIFF: Everyone please come 7 forward. It's the same seats you were in before. 8 THE COURT: Where's Number 23? Do we 9 have a 23? 10 THE BAILIFF: Number 23. 11 THE COURT: No 23? 12 THE BAILIFF: Please sit where you were 13 before. 14 THE COURT: Number 25. 15 THE BAILIFF: The same place you were 16 sitting. 17 THE COURT: Number 26. 18 Have a seat. Do we have everybody? 19 15, 16, all right. 28. Okay. 18, 19, 20, 25. 20 Perfect. All right. So we did replace 21 Number 7 with Number 29, correct? 22 You're 29, sir?	136	1 reimbursed for the full six weeks? 2 THE COURT: We'll send the letter. I 3 think that will resolve the issue because they 4 have to. By law, they have to. 5 JUROR NUMBER 3: Okay. 6 THE COURT: All right. So ladies and 7 gentlemen, we got through the two big questions. 8 We have many more other questions, but I don't 9 think they'll be as long as the last two, so 10 that's why we wanted to do that ahead of time, 11 okay? 12 Now, what we're going to do, I'm 13 just -- our jury panel itself is the jurors that 14 are sitting in this jury box and the jurors on the 15 front row. Those 21 people are what we are going 16 to direct our attention to now and ask the 17 questions to those 21 people. If for some reason 18 these 21 people cannot sit on the jury panel, then 19 we'll be calling the other jurors forward to take 20 their places. So, I would ask the other jurors, 21 though I'm not going to ask you the questions 22 directly at this time, I would ask you to pay

<p style="text-align: right;">137</p> <p>1 attention to all the questions that are being 2 asked, and then if you do become on the jury panel 3 of one of these 21 people, I'll ask if you heard 4 all the questions that have been said so far and 5 if you have anything to add to that, okay? 6 Thank you, I appreciate it. 7 Ladies and gentlemen, I'm going to ask 8 you a few questions first, and then the attorneys 9 have an opportunity to ask you questions as well. 10 My first question is, if you understand 11 English, would you raise your right hand. Make 12 sure we get it all straight. We have everybody. 13 Everybody understands English. 14 All right. If you can answer the next 15 questions I have for you out loud since we have a 16 court reporter. I appreciate it. Okay. 17 Have you lived in the County or City of 18 Fairfax for the past six months and in the 19 Commonwealth of Virginia for the past year? 20 (Whereupon, all jurors replied, "Yes.") 21 THE COURT: Are each of you a citizen 22 of the United States?</p>	<p style="text-align: right;">139</p> <p>1 any party in this case? 2 (Whereupon, all jurors replied, "No.") 3 THE COURT: Does anybody have a problem 4 hearing or seeing, that we haven't discussed 5 already? 6 (Whereupon, all jurors replied, "No.") 7 THE COURT: Do you know any reason, 8 whatsoever, why you cannot give a fair and 9 impartial trial to both parties in this matter? 10 (Whereupon, all jurors replied, "No.") 11 THE COURT: All right. That's all the 12 questions that I have. 13 Ms. Vasquez, your questions. 14 MS. VASQUEZ: Your Honor, may I please 15 wear... 16 THE COURT: Yes. We have it for you. 17 MS. VASQUEZ: Good afternoon, everyone. 18 Thank you very much for being here today. You've 19 heard a little bit about this case already this 20 morning from Chief Judge. If you're selected as a 21 juror, you will get to hear everything. I'm 22 looking forward to telling you about this case.</p>
<p style="text-align: right;">138</p> <p>1 (Whereupon, all jurors replied, "Yes.") 2 THE COURT: Have you ever been 3 convicted of a felony? 4 (Whereupon, all jurors replied, "No.") 5 THE COURT: Do you have a case 6 currently pending in the Fairfax County Circuit 7 Court? 8 (Whereupon, all jurors replied, "No.") 9 THE COURT: Do you know or are related 10 by blood or marriage to either party? 11 (Whereupon, all jurors replied, "No.") 12 THE COURT: Do you know any of the 13 attorneys in this case in any capacity, personal 14 or professional, as a friend, employee, client or 15 opposing counsel? 16 (Whereupon, all jurors replied, "No.") 17 THE COURT: Do you have any interest in 18 the outcome of this case, such as any personal or 19 financial interest in the outcome? 20 (Whereupon, all jurors replied, "No.") 21 THE COURT: Are you aware of any bias 22 or prejudice that you might have for or against</p>	<p style="text-align: right;">140</p> <p>1 But today is the day we get to hear from you. 2 Each and every one of you. 3 It's our only chance to have a 4 conversation. My job is to ask you about 5 experiences and opinions that you hold and may be 6 relevant to this case, and some of the experiences 7 might help you as a juror and some of those 8 experiences might make it hard for you to be 9 impartial. And if that's true for you, it doesn't 10 mean you're an unfair person. It just means that 11 this might not be the right case for you to sit on 12 as a juror. 13 There are no right or wrong answers. 14 If a question applies to you, the only thing I ask 15 is that you, please, raise your hand and I will 16 read off your jury numbers so I can keep track, 17 and then I will follow up with you. If there's a 18 question you would prefer to answer in private, 19 just let us know and we can ask the judge if we 20 can discuss the issue at sidebar. 21 So, my first question for each of you 22 today is, we've already spoken with some of you</p>

141	<p>1 that have read or heard about this lawsuit. But 2 let me ask a more general question. How many of 3 you follow stories in media about celebrities? 4 Again, by a show of hands. 5 Juror number. Number 2, 28. 6 Anybody else follow stories in the 7 media about celebrities? I'll start with you, 8 Number 2. 9 Is there anyone here who you would say 10 celebrity news is something you read of regularly? 11 JUROR NUMBER 2: No. 12 MS. VASQUEZ: What's your primary 13 source of celebrity news? 14 JUROR NUMBER 2: Newspaper. 15 MS. VASQUEZ: Any particular newspaper? 16 JUROR NUMBER 2: I subscribe to the 17 Washington Post. 18 MS. VASQUEZ: Okay. Any others? 19 Juror Number 28, same questions for 20 you. Is there anyone here you would say celebrity 21 news is something you read on a regular basis? 22 JUROR NUMBER 28: Can you hear me? I</p>	143	<p>1 How many of you would say that most of 2 what you read and hear about celebrities is true? 3 Some people say that a person's 4 personal life should be private, even if they are 5 a celebrity. I don't think that by choosing a 6 career in the public eye that it's fair game for 7 celebrities' personal lives to be featured in 8 media stories. 9 How many of you agree that it is fair 10 game for celebrities' lives to be featured in 11 media stories? 12 Number 18. 13 JUROR NUMBER 18: Somewhere in the 14 middle. Depends on how much they put themselves 15 out there and how much they share. 16 MS. VASQUEZ: Okay. 17 Do you think my client, Mr. Depp, has 18 put himself out there? 19 JUROR NUMBER 18: Not that I've seen, 20 no. 21 MS. VASQUEZ: Okay. 22 How many of you have read or heard</p>
142	<p>1 wouldn't say there's anything specific that comes 2 to mind, just things that are in the mainstream 3 media and where I see on social media. 4 MS. VASQUEZ: Social media. When you 5 say "social media," do you mean -- which one? 6 JUROR NUMBER 28: Usually Facebook. 7 MS. VASQUEZ: Okay. Thank you. 8 Have any of you, have you or anyone 9 close to you ever worked for a celebrity or 10 someone in the entertainment industry? Again, by 11 a show of hands. 12 No one. No one in the entertainment 13 industry or celebrity? 14 How many of you read opinion or 15 editorials either in print or online in the paper? 16 Number 11. 17 JUROR NUMBER 11: Wall Street Journal. 18 MS. VASQUEZ: Okay. Any other? 19 JUROR NUMBER 11: No. 20 MS. VASQUEZ: Just Wall Street Journal? 21 Thank you. 22 Anyone here on the first row?</p>	144	<p>1 something about my client, Johnny Depp? 2 There's a lot of hands on that one. 3 Bear with me. Can I have everyone, please, raise 4 their hands. 5 Let's start with Number 26. 6 Is there anyone here who has never -- 7 well, okay. 8 JUROR NUMBER 26: I mean, just seen the 9 movies, with Heard in it. 10 THE COURT: We can't hear over here. 11 MS. VASQUEZ: There's the mic. 12 JUROR NUMBER 26: Seeing movies, and, 13 obviously, what small amount I shared with you 14 earlier about things in the case, and the sidebar 15 thing for questions to the judge 16 MS. VASQUEZ: I'm sorry, you want to 17 have a sidebar with the Court? 18 JUROR NUMBER 26: Yes, after. 19 MS. VASQUEZ: After we're done? 20 JUROR NUMBER 26: I just want to make 21 sure something won't disqualify me. 22 THE COURT: We can do that now.</p>

Transcript of Jury Trial - Day 1  
Conducted on April 11, 2022

37 (145 to 148)

145	<p>1 JUROR NUMBER 26: Sorry about that. 2 THE COURT: That's all right. 3 Number 26, yes. 4 JUROR NUMBER 26: So, my wife is a 5 former police officer, also, top secret DOD. All 6 that stuff. 7 THE COURT: I mean, one of the 8 questions was about law enforcement. That doesn't 9 disqualify you as all. 10 JUROR NUMBER 26: And then previously, 11 in, like, nothing on the record, but domestic-type 12 stuff before, so I didn't know if that would 13 disqualify me. 14 THE COURT: Again, they're going to ask 15 you questions. 16 JUROR NUMBER 26: Nothing with the 17 police involved. 18 THE COURT: Okay. 19 MS. VASQUEZ: Thank you. 20 THE COURT: Yeah. 21 MS. VASQUEZ: So, sorry, I'll ask the 22 question again.</p>	147	<p>1 MS. VASQUEZ: Thank you. 2 Number 11. 3 JUROR NUMBER 11: Just the movie, 4 that's it. 5 MS. VASQUEZ: Any particular film? 6 JUROR NUMBER 11: The Chocolate 7 Factory. 8 MS. VASQUEZ: Anything else that you've 9 read or heard about my client? 10 JUROR NUMBER 11: No. 11 MS. VASQUEZ: Number 12. 12 JUROR NUMBER 12: Just movies, previews 13 and credits. 14 THE COURT: If you can just shortcut 15 this. If it's just on movies, you don't need to 16 raise your hand. If it's something other than 17 movies, you can raise your hand. 18 MS. VASQUEZ: Thank you, Your Honor. 19 That's a great suggestion. 20 Anybody other than movies? No? No 21 one? Let's go to the first row. Other than 22 movies? Yes.</p>
146	<p>1 By a show of hands, how many of you 2 have read or heard something about my client, 3 Johnny Depp? 4 Let's start with Number 6. 5 JUROR NUMBER 6: Hi, just through 6 headlines, but I don't really read into those and 7 read press, stuff like that. 8 MS. VASQUEZ: So just general 9 entertainment-type news? 10 JUROR NUMBER 6: Correct. 11 MS. VASQUEZ: The next hand that was 12 raised? Number 10. Thank you. 13 JUROR NUMBER 10: Only thing I heard is 14 generalities regarding marriage issues. 15 MS. VASQUEZ: Let's talk a little bit 16 about that. 17 What have you heard, generally, about 18 Mr. Depp and his marriage issues? 19 JUROR NUMBER 10: Just that is was 20 contentious. 21 MS. VASQUEZ: Anything else? 22 JUROR NUMBER 10: That's it.</p>	148	<p>1 JUROR: Just what I shared earlier. 2 MS. VASQUEZ: Okay. Just the sidebar? 3 JUROR: Yep. 4 MS. VASQUEZ: Anybody else? Great. 5 Okay. 6 Is there anyone here who has never read 7 or heard anything about Johnny Depp? By a show of 8 hands. 9 Okay. How many of you can't recall 10 ever seeing a movie with Johnny Depp or think you 11 may have only seen one? 12 JUROR NUMBER 22: Can you repeat the 13 question? 14 MS. VASQUEZ: Absolutely. Thank you, 15 Number 22. 16 How many of you can't recall ever 17 seeing a movie with Johnny Depp or think you may 18 have only seen one movie? 19 Have any of you formed a negative 20 opinion of Johnny Depp based on something you've 21 read or heard or maybe a movie he was in? By a 22 show of hands. Anyone?</p>

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

24315

149	1 Before today, how many of you heard of 2 the defendant, the actress, Amber Heard? 3 Number 26. 4 JUROR NUMBER 26: Could you repeat the 5 question? 6 MS. VASQUEZ: Absolutely. Before 7 today, how many of you heard of the defendant, the 8 actor, Amber Heard? 9 Number 26, how many -- how have you 10 heard of her? 11 JUROR NUMBER 26: From movies. 12 MS. VASQUEZ: Have you seen her in a 13 film? 14 JUROR NUMBER 26: I believe so, yes. 15 MS. VASQUEZ: How many films have you 16 seen her in? 17 JUROR NUMBER 26: Probably more than 18 one. 19 MS. VASQUEZ: Can we have the 20 microphone? 21 Who else has heard about the defendant, 22 Amber Heard?	151	1 Yeah, absolutely. Number 2, thank you. 2 JUROR NUMBER 2: On the following 3 celebrities, I guess I just meant I read about 4 them and their style. I just wanted to clear that 5 up. 6 MS. VASQUEZ: Thank you for that. 7 JUROR NUMBER 2: I don't know. 8 MS. VASQUEZ: So style question only. 9 Thank you, Number 2. 10 JUROR NUMBER 2: Sorry. 11 MS. VASQUEZ: No, that's okay. Thank 12 you for that clarification. 13 Number 15. 14 JUROR NUMBER 15: Just general 15 entertainment movies. 16 MS. VASQUEZ: Have you seen a film? 17 JUROR NUMBER 15: I can't remember. 18 MS. VASQUEZ: With Ms. Heard? 19 JUROR NUMBER 15: I don't know. 20 MS. VASQUEZ: But you've heard of her? 21 JUROR NUMBER 15: Yeah. 22 MS. VASQUEZ: 16.
150	1 JUROR NUMBER 12: Including movies or 2 no? 3 MS. VASQUEZ: Yeah, including moves. 4 Number 10. 5 JUROR NUMBER 10: The same thing I said 6 before, just credits to the generalities, as far 7 as marital issues. 8 MS. VASQUEZ: So you understood, from 9 what you read or heard, that Ms. Heard and 10 Mr. Depp were married? 11 JUROR NUMBER 10: Correct. 12 MS. VASQUEZ: Thank you. Number 12. 13 JUROR NUMBER 12: Again, just movies, 14 but I can't think of the name of a single one. 15 MS. VASQUEZ: Do you know how many 16 you've seen? 17 JUROR NUMBER 12: No. 18 MS. VASQUEZ: Number 4. 19 JUROR NUMBER 4: Movies. I couldn't 20 name any of them, just like one or two movies that 21 I've seen with her. 22 MS. VASQUEZ: Great, thank you.	152	1 JUROR NUMBER 16: Just a movie. Just 2 one. 3 MS. VASQUEZ: What film? 4 JUROR NUMBER 16: Aquaman. 5 MS. VASQUEZ: Okay. Fantastic. Thank 6 you. 7 Number 28. 8 JUROR NUMBER 28: I haven't seen any 9 movies, but I just heard about her in the context 10 of their relationship. 11 MS. VASQUEZ: The relationship meaning 12 Mr. Depp and Ms. Heard? 13 JUROR NUMBER 28: Yeah. 14 MS. VASQUEZ: Number 19. 15 JUROR NUMBER 19: Only what I said 16 earlier, their marriage. 17 MS. VASQUEZ: Understood. 18 Number 21. Movies? 19 JUROR NUMBER 21: Movies. 20 MS. VASQUEZ: Have you seen Ms. Heard 21 in any films? 22 JUROR NUMBER 21: Yeah. Aquaman.

153	1 MS. VASQUEZ: Any others that come to 2 mind? 3 JUROR NUMBER 21: Probably, but I don't 4 remember. 5 MS. VASQUEZ: Thank you. 6 Are any of you a member or active 7 participant in any groups that identify with the 8 Me Too movement? A show of hands. Sorry. 9 Are any of you a member or active 10 participant in any groups that identify with the 11 Me Too movement? 12 I'm sorry, Number 3, did you raise your 13 hand? 14 JUROR NUMBER 3: No. 15 MS. VASQUEZ: Apologies. 16 Do any of you hold the opinion that a 17 person's account of abuse or sexual assault should 18 be believed without question? By a raise of 19 hands. 20 Number 18? No? 21 Do you hold the opinion that people 22 rarely or almost never make false accusations of	155	1 violated, but, of course, you can't know without 2 questioning, which your previous question asked. 3 Then this recent one you just asked was, I don't 4 know, I forgot. 5 MS. VASQUEZ: Do you hold the opinion 6 that people rarely or almost never make false 7 accusations of abuse or sexual assault? Do you 8 hold that opinion, that people rarely make false 9 accusations of abuse or sexual assault? 10 JUROR NUMBER 20: I think that when 11 they do feel that they're being assaulted, there 12 is something there. But to what degree, that's 13 another question. 14 MS. VASQUEZ: Do you tend to believe 15 that if someone makes an accusation, right, of 16 abuse or sexual assault, for example, that usually 17 they're telling the truth? 18 JUROR NUMBER 20: The word accusation 19 makes it seem like they're not telling the truth. 20 I would just say that if they're expressing that 21 they feel a certain way, then they should look 22 into that to see if it is an accusation or it
154	1 abuse or sexual assault? 2 Anybody in the first row? 3 Number 21, do you have something? No. 4 When you hear that a male has accused 5 his female spouse or partner of being physically 6 abusive, do you tend to believe him or are you 7 skeptical? 8 Would you please raise your hand if 9 you're skeptical. 10 Have any of you -- I'm sorry, I 11 apologize. Number 20. 12 THE COURT: Wait for the microphone. 13 MS. VASQUEZ: If I'm going too quickly, 14 just, please. 15 JUROR NUMBER 20: Let me take a minute 16 to think about everything 17 MS. VASQUEZ: I'll slow down my pace. 18 JUROR NUMBER 20: No, you're fine. If 19 it's a question about how it's rare for someone to 20 make a false claim when they feel abused, I feel 21 that it is an emotional thing, and, so, if they 22 feel violated, I would believe that they've been	156	1 really did happen. 2 MS. VASQUEZ: Yeah, no. That's very 3 much helpful. 4 Is there a reason that you feel that 5 way? Can you express your reason why? 6 JUROR NUMBER 20: Because relationships 7 are complicated, and when you're involved with 8 someone, another individual, there's a lot of 9 feelings that come into play, and, like, at times, 10 you might think this is what you want but, 11 perhaps, not really -- you end up thinking that's 12 not really what you wanted and then eventually 13 that abuse or violation for being violated has 14 come to surface, and then you question yourself 15 that it didn't happen. So I think that it's kind 16 of like multiple levels to it. 17 MS. VASQUEZ: Understood. Given that 18 this case involves Mr. Depp claiming that 19 Ms. Heard has falsely accused him, is it fair to 20 say that you have (indiscernible) time in your 21 mind? 22 JUROR NUMBER 20: No.

157	1 MS. VASQUEZ: So would it be difficult 2 for you to be entirely impartial? 3 JUROR NUMBER 20: I don't think. 4 MS. VASQUEZ: Thank you very much. I 5 really appreciate that. 6 I'll try to slow down because I know 7 I'm trying to talk to a lot of people. 8 When you hear that a male has accused a 9 female spouse or partner of being physically 10 abusive, do you tend to believe him or are you 11 skeptical? 12 Anyone have any skepticism? 13 Have you or a family member, or someone 14 close to you, ever had any education, training, 15 work, or other experience involving the legal 16 field? Let's start with that one. 17 Number 26. 18 JUROR NUMBER 26: I don't know if it 19 directly applies. My wife is a former police 20 officer, my father-in-law is the head of the 21 Southeast for all federal bureau prisons, and just 22 other people of that nature.	159	1 work in academic publishing. 2 MS. VASQUEZ: Okay. Do they work for a 3 firm or a specific publication? 4 JUROR NUMBER 12: My mom works for 5 Publication Professionals, it's an editing 6 company, and my dad works for Sage Publications, 7 formerly Congressional Quarterly. 8 My mom is the editor of Publication 9 Professionals, they edit for people in World Bank. 10 My dad works for Sage Publications, formerly 11 Congressional Quarterly, as a content manager. 12 MS. VASQUEZ: Thank you. 13 Oh, I'm sorry, Number 16. Apologies. 14 JUROR NUMBER 16: My mother works for a 15 company called Media Matters for America. It does 16 work with the government. 17 MS. VASQUEZ: I'm sorry, I didn't catch 18 that name. 19 JUROR NUMBER 16: Media Matters for 20 America. 21 MS. VASQUEZ: Media Matters. 22 Fantastic. Thank you.
158	1 MS. VASQUEZ: Thank you, Number 26. 2 Anyone else who -- okay. Number 28. 3 JUROR NUMBER 28: Previously worked in 4 law enforcement. 5 MS. VASQUEZ: Okay. And what, 6 specifically? 7 JUROR NUMBER 28: I worked for the FBI. 8 MS. VASQUEZ: You worked for the FBI. 9 Thank you. 10 Number 18. 11 JUROR NUMBER 18: I worked as a family 12 law paralegal for seven years, then I worked here 13 for the Circuit Court for six years, and I've been 14 with the police department for three years. 15 MS. VASQUEZ: Anyone else? 16 Again, same part of the first part of 17 the question. Have you or a family member, or 18 someone close to you, ever have any education, 19 training, work or other experience involving media 20 or news? Media or news? Anyone? 21 Yeah, Number 12. 22 JUROR NUMBER 12: Both of my parents	160	1 Have you or a family member, or someone 2 close to you, ever had any education, training, 3 work or other experience involving the 4 entertainment industry? 5 Same question. You, someone close to 6 you, a family member had any training, work or 7 other experience involving the medical field? 8 We'll start with Number 27. 9 JUROR NUMBER 27: My wife is a nurse. 10 MS. VASQUEZ: Your wife is a nurse. 11 What does she specialize in? 12 JUROR NUMBER 27: Operating room nurse. 13 MS. VASQUEZ: Fantastic. 14 Number 2. 15 JUROR NUMBER 2: My brother-in-law is a 16 pediatrician. 17 MS. VASQUEZ: Number 14. 18 JUROR NUMBER 14: Back to the previous 19 question, I apologize. My husband volunteers as a 20 roadie kind of thing for bands. So he just helps 21 out with sound and setup. But that was regarding 22 the entertainment.

Transcript of Jury Trial - Day 1  
 Conducted on April 11, 2022

161	<p>1 MS. VASQUEZ: Yeah, okay. Fantastic.                  2 JUROR NUMBER 14: I just forgot about                  3 it.                  4 MS. VASQUEZ: Is he a musician?                  5 JUROR NUMBER 14: No, he does sound.                  6 MS. VASQUEZ: Anyone?                  7 Number 16.                  8 JUROR NUMBER 16: My uncle works as a                  9 nurse in Maryland.                  10 MS. VASQUEZ: Okay. Thank you.                  11 Number 19.                  12 JUROR NUMBER 19: My mom was a nurse                  13 and nurse educator for over 25 years.                  14 MS. VASQUEZ: Okay. Thank you.                  15 Number 26.                  16 JUROR NUMBER 26: My sister-in-law is a                  17 registered nurse in home health care right now,                  18 but other stuff in the past.                  19 MS. VASQUEZ: What type of nurse is                  20 she?                  21 JUROR NUMBER 26: I'm not sure exactly.                  22 I know she does home health care now.</p>	163	<p>1 Apologize. For you or family member or someone                  2 close to you.                  3 JUROR NUMBER 6: So my grandmother was                  4 a nurse, and I'm currently a medical assistant.                  5 MS. VASQUEZ: Okay. And are you                  6 working as a medical assistant?                  7 JUROR NUMBER 6: Yes, for a podiatrist.                  8 MS. VASQUEZ: Podiatrist.                  9 Number 10.                  10 JUROR NUMBER 10: I have a cousin who,                  11 I believe, is an orthopedic surgeon.                  12 MS. VASQUEZ: Okay. Great. Thank you.                  13 Anyone else?                  14 Same preface of the question. Have                  15 you, family member or someone close to you ever                  16 had any education, training, work or other                  17 experience involving psychology or counseling? By                  18 a show of hands. Psychology or counseling?                  19 Number 27.                  20 JUROR NUMBER 27: My wife majored in                  21 psychology at the University of Pittsburgh, but                  22 she works as a nurse now.</p>
162	<p>1 MS. VASQUEZ: Home health care?                  2 JUROR NUMBER 26: I think she's an RN.                  3 MS. VASQUEZ: Great.                  4 Number 29.                  5 JUROR NUMBER 29: My mom is a                  6 registered nurse and cousin is an anesthesiologist                  7 for NYU.                  8 MS. VASQUEZ: What kind of nurse is                  9 your mom?                  10 JUROR NUMBER 29: Not practicing, but                  11 she has her certificate and master's degree.                  12 MS. VASQUEZ: What type of nurse was                  13 she before?                  14 JUROR NUMBER 29: I know she works in                  15 the emergency, so --                  16 MS. VASQUEZ: Emergency room nurse?                  17 JUROR NUMBER 29: Yeah.                  18 MS. VASQUEZ: Wonderful.                  19 Number 6.                  20 JUROR NUMBER 6: Just to clarify, was                  21 this for yourself or family member?                  22 MS. VASQUEZ: Yeah, I'm sorry.</p>	164	<p>1 MS. VASQUEZ: But she majored in it.                  2 Thank you.                  3 Number 16.                  4 JUROR NUMBER 16: My sister minored in                  5 psychology, but she works as a social worker.                  6 MS. VASQUEZ: So your sister works as a                  7 social worker, and she minored in psychology?                  8 JUROR NUMBER 16: Yes.                  9 MS. VASQUEZ: And does she live here?                  10 JUROR NUMBER 16: Yes.                  11 MS. VASQUEZ: Okay. Anyone else?                  12 Have you or a family member or someone                  13 close to you ever had any education, training,                  14 work or other experience involving abuse,                  15 advocacy, or care?                  16 JUROR NUMBER 14: Did you say                  17 experience?                  18 MS. VASQUEZ: Yeah. Abuse, yeah.                  19 Number 14.                  20 JUROR NUMBER 14: I was a victim of                  21 abuse and I grew up in foster care.                  22 MS. VASQUEZ: Okay. Thank you for</p>

Transcript of Jury Trial - Day 1  
Conducted on April 11, 2022

165	1 sharing that. And in the questions that are 2 coming up, if you would like to discuss -- 3 JUROR NUMBER 14: Dealt with it years 4 ago. Thank you. 5 MS. VASQUEZ: My apologies. Thank you 6 for sharing that. 7 Have any of you ever been in a position 8 of leadership, such as supervisor of a job, head 9 of a committee? 10 Okay. Let's start with Number 25. 11 JUROR NUMBER 25: I'm a supervisor at 12 Costco and I do leadership group. 13 MS. VASQUEZ: You're a supervisor and, 14 sorry, I didn't catch that. 15 JUROR NUMBER 25: Costco grocery 16 center. 17 MS. VASQUEZ: Okay. Is that a position 18 that you hold now? 19 JUROR NUMBER 25: Yes. 20 MS. VASQUEZ: Yeah? 21 JUROR NUMBER 25: Almost 15 years. 22 MS. VASQUEZ: Almost 15 years.	167	1 JUROR NUMBER 10: Architectural. 2 MS. VASQUEZ: And you currently own 3 that? 4 JUROR NUMBER 10: I don't. Currently, 5 I'm working for another employer. 6 MS. VASQUEZ: Do you hold any type of 7 leadership position working for that employer? 8 JUROR NUMBER 10: Responsibilities of 9 consultants, so managing them. 10 MS. VASQUEZ: Okay. Thank you. 11 Number 4. 12 JUROR NUMBER 4: I'm a head foreman at 13 my construction company. I am in charge of, like, 14 three to four people a day, and I'm in charge of 15 around three to four jobs a week. 16 MS. VASQUEZ: Okay. Thank you. 17 Anyone else with leadership experience? 18 Number 12. 19 JUROR NUMBER 12: I'm a teacher, so I'm 20 in charge of a bunch of 16, 17, 18-year-olds. 21 MS. VASQUEZ: Got it. I love that. 22 Number 2.
166	1 Impressive. Thank you. 2 Number 26. 3 JUROR NUMBER 26: I'm a project manager 4 for a construction company, so I do oversee some 5 aspects and people. 6 MS. VASQUEZ: Okay. How many people do 7 you oversee? 8 JUROR NUMBER 26: Kind of in charge of 9 making sure all departments kind of come together 10 so they have a quality final product on time. I 11 won't say, specifically, I'm their boss but I've 12 got to make sure everything is correct. 13 MS. VASQUEZ: And taken care of? 14 JUROR NUMBER 26: Yes. 15 MS. VASQUEZ: Understood. 16 Anyone else, leadership position? 17 Number 10. 18 JUROR NUMBER 10: I've owned and 19 operated my own firm and I've also been employed 20 and dealing with people, outside consultants. 21 MS. VASQUEZ: When you say your own 22 firm what is --	168	1 JUROR NUMBER 2: I was a town manager, 2 and I manage 25 people. And I've been on various 3 boards and associations in leadership positions. 4 I am not currently a town manager. 5 MS. VASQUEZ: What particular boards or 6 associations have you held -- 7 JUROR NUMBER 2: My children's 8 preschool and my neighborhood association, 9 Toastmasters, graduate school, et cetera. I mean, 10 many. 11 MS. VASQUEZ: Thank you, Number 2. 12 Anyone else? 13 Number 14. 14 JUROR NUMBER 14: I was a network 15 operations manager. I had several employees under 16 me. I'm not currently. 17 MS. VASQUEZ: Are you not -- 18 JUROR NUMBER 14: Now I work for 19 (indiscernible). 20 MS. VASQUEZ: Great. Thank you very 21 much. 22 Let's start with 15.

Transcript of Jury Trial - Day 1  
Conducted on April 11, 2022

169	1 JUROR NUMBER 15: I was an executive at 2 a IT company. Now I run my own IT company. I 3 supervisor people. 4 MS. VASQUEZ: So, IT. 5 Number 28. 6 JUROR NUMBER 28: It's not the position 7 I'm in right now, but I was a staff supervisor, so 8 I was just in charge of, like, maybe four to six 9 people. 10 MS. VASQUEZ: Okay. 11 Now you're currently in that position? 12 JUROR NUMBER 28: I'm not in that 13 position. 14 MS. VASQUEZ: Okay. 15 Number 18. 16 JUROR NUMBER 18: I was a supervisor 17 when I worked here at the Circuit Court, and I've 18 also served on the board of the Fairfax County 19 Mothers of Multiples, a nonprofit. 20 MS. VASQUEZ: What is that nonprofit? 21 JUROR NUMBER 18: It's twin moms. 22 MS. VASQUEZ: Twin moms.	171	1 Currently married or married in the 2 past? 3 JUROR NUMBER: Married. And occupation 4 is entrepreneur. 5 MS. VASQUEZ: Entrepreneur. Does he 6 specialize in anything? 7 JUROR: Culinary. 8 MS. VASQUEZ: Culinary. 9 JUROR: Currently married, and he is a 10 customer success manager for an IT company. 11 MS. VASQUEZ: Customer success manager 12 for an IT company. Okay. 13 Over here. Number 15. 14 JUROR NUMBER 15: Married, and a 15 financial management and entrepreneurship. 16 MS. VASQUEZ: Your spouse? 17 JUROR NUMBER 15: Yeah. Thank you. 18 MS. VASQUEZ: Married or been married, 19 Number 14? 20 JUROR NUMBER 14: Married. 21 Telecommunications engineer. 22 MS. VASQUEZ: Okay. Number 27.
170	1 Number 19. 2 JUROR NUMBER 19: Yeah, I oversaw a 3 department, the hospitality department. Soccer 4 coach and Sunday school teacher. Some leadership 5 in that regard. 6 MS. VASQUEZ: Absolutely. 7 Are you currently married or have you 8 been married in the past? If so, raise your hand. 9 They have the microphone. Let's start 10 over here. I'll come back. 11 Currently married or have been married 12 in the past. What I need to know is, are you 13 currently married? 14 JUROR: No. 15 MS. VASQUEZ: Married in the past? 16 JUROR: Yeah. 17 MS. VASQUEZ: What was your spouse or 18 partner's occupation? 19 JUROR: IT. 20 MS. VASQUEZ: IT? 21 JUROR: Yeah. 22 MS. VASQUEZ: The next person.	172	1 JUROR NUMBER 27: Married, nurse. 2 MS. VASQUEZ: Married nurse, right. 3 Number 11. 4 JUROR NUMBER 11: Married 54 years. 5 MS. VASQUEZ: Congratulations. 6 JUROR NUMBER 11: And he's a Colonel in 7 the Air Force. 8 MS. VASQUEZ: Thank you for his 9 service. 10 Number 10. 11 JUROR NUMBER 10: Previously married. 12 Facilities manager. 13 MS. VASQUEZ: Thank you. 14 JUROR: Married, and my wife is a 15 business manager at a community college. 16 MS. VASQUEZ: At a college? 17 JUROR: Yeah. 18 MS. VASQUEZ: Community college? 19 JUROR: Yeah. 20 MS. VASQUEZ: Thank you. 21 26. 22 JUROR NUMBER 26: Married. My wife is

Transcript of Jury Trial - Day 1  
Conducted on April 11, 2022

173	<p>1 a -- I'm trying to figure out what I can tell you. 2 She works for DOD. She used to be a police 3 officer, and I had left out that she used to work 4 for a law firm at one point as well, for a short 5 time. 6 MS. VASQUEZ: What was the name of the 7 law firm? 8 JUROR NUMBER 26: It's not local. It's 9 in Georgia 10 MS. VASQUEZ: Was she a lawyer? 11 JUROR NUMBER 26: She was, like, a 12 legal assistant. 13 MS. VASQUEZ: Okay. Thank you. 14 Anybody here been married or currently 15 married? 16 JUROR NUMBER 23: Currently married but 17 she is a housewife. 18 MS. VASQUEZ: Okay. I'm sorry, your 19 number, sir? 23? 20 JUROR NUMBER 23: Yeah. 21 MS. VASQUEZ: So, you are currently 22 married and your wife is a housewife?</p>	175	<p>1 MS. VASQUEZ: Any others with children 2 that currently live in the house? 3 Number 3. 4 JUROR NUMBER 3: Two daughters and two 5 grandsons. 6 MS. VASQUEZ: Two daughters and two 7 grandchildren, grandsons. Thank you. 8 Anyone else with children that 9 currently live in the house? 10 Number 26. 11 JUROR NUMBER 26: I have a son, his 12 birthday was yesterday, two years old. 13 MS. VASQUEZ: Anyone else with children 14 in the house? 15 Number 15. 16 JUROR NUMBER 15: 17-year-old, 17 18-year-old and 20-year-old. 18 MS. VASQUEZ: Okay. And they're all at 19 home? 20 JUROR NUMBER 15: All at home. 21 MS. VASQUEZ: Okay. Number 18. 22 JUROR NUMBER 18: I have 5-year-old</p>
174	<p>1 JUROR NUMBER 23: Yes, she is. 2 MS. VASQUEZ: Thank you. Just want to 3 make sure everybody hears. 4 Number 2. Pass the mic. Thank you. 5 JUROR NUMBER 2: I'm married and my 6 husband is a software sales director. 7 MS. VASQUEZ: And Number 22. 8 JUROR NUMBER 22: Married over 30 years 9 ago, (indiscernible). 10 MS. VASQUEZ: And what did your 11 spouse -- 12 JUROR NUMBER 22: Computer engineer. 13 MS. VASQUEZ: Computer engineer. Okay. 14 Great. 15 Now the question is, do any of you have 16 children that live with you, currently, in the 17 house? Sorry, we'll start with anyone with 18 children that currently live in the house. 19 Number 2. 20 JUROR NUMBER 2: Yes, I have two that 21 are currently living in the house, a 13-year-old 22 and a 12-year-old.</p>	176	<p>1 twin girls. 2 JUROR NUMBER 19: I have a 13-year-old 3 daughter. 4 MS. VASQUEZ: 13-year-old daughter, 5 Number 19. 6 So, this is a question that if you 7 raise your hand and the answer is yes, I think it 8 might be best that we have a sidebar. So I'm just 9 previewing that for everyone. 10 So the question is, have you or a 11 family member, or anyone close to you, ever had 12 any personal or professional experience, of any 13 kind, involving domestic abuse or sexual assault? 14 And let me first see a show of hand. 15 Number 21, Number 12, Number 3. 16 JUROR NUMBER 26: Can you repeat it? 17 MS. VASQUEZ: Absolutely. I'm going to 18 repeat the question. 19 Have you, a family member or anyone 20 close to you ever had any personal or professional 21 experience, of any kind, involving domestic abuse 22 or sexual assault? By a show of hands.</p>

Transcript of Jury Trial - Day 1  
Conducted on April 11, 2022

177	1 Number 3, Number 12, Number 4, Number 2 28, Number 20, and 21. 3 So, Your Honor, may we approach one at 4 a time? 5 THE COURT: Sure. 6 MS. VASQUEZ: Thank you. So, let's go 7 with 21. 8 THE COURT: All right. Yes, ma'am. 9 JUROR NUMBER 21: So, my ex was 10 arrested for assault. 11 THE COURT: Domestic assault on you? 12 JUROR NUMBER 21: Uh-huh. 13 THE COURT: How long ago was that? 14 JUROR NUMBER 21: One year and a half 15 ago. 16 THE COURT: A year and a half ago. Did 17 you go to trial? 18 JUROR NUMBER 21: I don't know yet. I 19 haven't heard anything. 20 THE COURT: Okay. Was he arrested here 21 in Fairfax? 22 JUROR NUMBER 21: Yes.	179	1 separate. 2 THE COURT: Do you have follow-up? 3 MS. VASQUEZ: Is there any reason you 4 think that, starting this case, you'll be in favor 5 of one side over another? 6 JUROR NUMBER 21: No, absolutely not. 7 MS. VASQUEZ: Okay. 8 THE COURT: Any questions? 9 MS. BREDEHOFT: No. 10 THE COURT: All right. You can have a 11 seat back. 12 Next one. 13 MS. VASQUEZ: Thank you. 14 The next one that raised their hand, 15 was it Number 20? Thank you. 16 THE COURT: 20. 17 JUROR NUMBER 20: So I was molested by 18 my cousin when I was about 11 or 12. 19 THE COURT: Okay. 20 JUROR NUMBER 20: Then I've had a 21 couple instances where things were just against my 22 will.
178	1 THE COURT: You haven't had any contact 2 with him since then? 3 JUROR NUMBER 21: Huh-uh. 4 THE COURT: Were you living together? 5 JUROR NUMBER 21: Yeah, we just moved 6 in together. Well, he got a no-contact order. 7 THE COURT: Do you still have a 8 protective order against him? 9 JUROR NUMBER 21: I think it's been 10 issued by the court. So I think it's -- 11 THE COURT: Two years. 12 JUROR NUMBER 21: But I don't know. 13 THE COURT: Did that experience, in any 14 way -- will that affect you here because there is 15 going to be some evidence? 16 JUROR NUMBER 21: No, I don't think so. 17 THE COURT: You can put your experience 18 to the side and be fair and impartial? 19 JUROR NUMBER 21: Yeah, yeah. I mean, 20 you know, I've had time to heal. 21 THE COURT: Okay. 22 JUROR NUMBER 21: I know I can	180	1 THE COURT: You're not going to renew 2 those relationships? 3 JUROR NUMBER 20: No. I'm in a 4 perfectly healthy relationship now. 5 THE COURT: Good. Congratulations. 6 JUROR NUMBER 20: I guess, personally, 7 I know what it's like to go through and not know 8 that it's happening. 9 THE COURT: So, would that experience 10 affect your ability to be impartial in this case? 11 There will be some testimony about domestic 12 assault and possible sexual abuse. Knowing that, 13 are you going to be able to put your experiences 14 aside and be fair and impartial in this case? 15 JUROR NUMBER 20: I believe so. I have 16 worked on myself a lot. I know every situation, 17 there are two sides to everything. I also know 18 that some people might overexaggerate certain 19 situations and that shouldn't be. It depends on 20 facts. 21 THE COURT: Okay. 22 JUROR NUMBER 20: And the evidence.

<p style="text-align: right;">181</p> <p>1 THE COURT: Sounds like you're in a 2 good place. I just want to make sure that nothing 3 would trigger you or anything, and I want to make 4 sure you'll be comfortable. 5 JUROR NUMBER 20: I'm fine. Just wanted 6 to be completely honest. 7 MS. VASQUEZ: I appreciate that 8 honesty. 9 Do you think that this will in any way 10 make you feel a certain way about this case, one 11 way or another? 12 JUROR NUMBER 20: Frankly, I don't know 13 either party very well, so there's no way me 14 leaning toward anyone, and I know they are 15 celebrities, so I don't follow up on that at all. 16 So I have, literally -- I'm a blank slate. I 17 have no idea who they are, personally. 18 THE COURT: All right. Any follow-up? 19 MS. BREDEHOFT: No. 20 THE COURT: You can have a seat. Thank 21 you. 22 Your next one.</p>	<p style="text-align: right;">183</p> <p>1 evidence in this case, and be fair and impartial? 2 JUROR NUMBER 28: Yeah. 3 THE COURT: Okay. Anything further on 4 that? 5 You can have a seat. 6 MS. VASQUEZ: Thank you for sharing. 7 The next person that raised their hand 8 to that question. Number 12. 9 THE COURT: All right. Yes, sir. 10 JUROR NUMBER 12: A former student of 11 mine reported that he had been abused and I had to 12 report it. 13 THE COURT: You had to report it. 14 JUROR NUMBER 12: That's the extent of 15 it. 16 THE COURT: How long ago was that? 17 JUROR NUMBER 12: Last year. Ninth 18 grader didn't give me any details, just I had to 19 report it. 20 THE COURT: I assume that wouldn't 21 affect your ability to be fair and impartial in 22 this case?</p>
<p style="text-align: right;">182</p> <p>1 MS. VASQUEZ: Next one that raised 2 their hand. Number 28. Thank you. 3 THE COURT: 28. 4 JUROR NUMBER 28: So it was domestic 5 violence, not sexual assault. It was my family, 6 not my immediate family, not my mom and dad, it 7 was, like, my aunt and uncle. My grandma and 8 grandpa had problems with that. I think that was 9 it for that question. Then the other question you 10 asked, I've been in a little bit of counseling 11 myself, it was just a few sessions, but I haven't 12 had any, like, work or training in it. I did a 13 couple myself, but I wanted to tell you about 14 that. 15 THE COURT: So with your aunt and uncle 16 and your grandparents, was that a long time ago or 17 was that recent? 18 JUROR NUMBER 28: I think, like, five 19 to seven years -- five years ago or something. I 20 don't think it was very recent. 21 THE COURT: Is that something that you 22 can put to the side, just have this case, the</p>	<p style="text-align: right;">184</p> <p>1 JUROR NUMBER 12: No. 2 THE COURT: Thank you. 3 MS. VASQUEZ: Thank you very much. 4 JUROR NUMBER 12: Thank you. 5 MS. VASQUEZ: The next juror, Number 3. 6 Thank you. 7 THE COURT: Yes, sir. 8 JUROR NUMBER 3: Kind of, like, 9 specifically back when I was a kid and my parents 10 were still together. Like, they would, like, have 11 arguments and sometimes the arguments were 12 violent. 13 THE COURT: When you say "violent," 14 they'd be physical? 15 JUROR NUMBER 3: My dad was, like, an 16 alcoholic. 17 THE COURT: And he would abuse your 18 mother? 19 JUROR NUMBER 3: Yes. 20 THE COURT: Did she ever have to go to 21 the hospital or were the police ever involved? 22 JUROR NUMBER 3: No.</p>

Transcript of Jury Trial - Day 1  
Conducted on April 11, 2022

185	1 THE COURT: Just something that you 2 witnessed? 3 JUROR NUMBER 3: It was just, like, 4 mostly verbal, but sometimes it got violent. 5 THE COURT: Sorry to hear that. Based 6 on those experiences, do you think you can put 7 those to the side and be fair and impartial in 8 this case, based just on the evidence? No issue? 9 JUROR NUMBER 3: Uh-huh. 10 THE COURT: Anything further? All 11 right. You can have a seat. 12 MS. VASQUEZ: Number 4. Thank you. 13 THE COURT: Yes, sir. 14 JUROR NUMBER 4: This just happened a 15 long time ago, my uncle and his wife, I can't 16 remember her name, but Kenneth Sole, they had some 17 problems back when they were younger. They've 18 both passed away now, so it doesn't really bother 19 me. 20 THE COURT: It was a violent 21 relationship? 22 JUROR NUMBER 4: Not violent, but they	187	1 JUROR NUMBER 26: I want to be fair. I 2 don't want to be biased. Sorry to waste your 3 time. 4 THE COURT: We're here for the next 5 seven weeks, if you haven't heard. 6 Does anybody have any objection to him 7 being taken off the panel? 8 MS. BREDEHOFT: No. 9 MS. VASQUEZ: No. 10 THE COURT: You can have a seat in the 11 back of the courtroom. 12 JUROR NUMBER 26: Thank you. 13 MS. VASQUEZ: Anyone else need a 14 sidebar? Number 28. 15 JUROR NUMBER 28: I'm so sorry, I 16 forgot to tell you one more thing. 17 THE COURT: You want to come back up 18 again? 19 JUROR NUMBER 28: My brother and his 20 girlfriend have a very volatile relationship. I 21 don't think anything has officially happened, but 22 a few things may be broken. They've broken up a
186	1 were aggressive towards each other. 2 THE COURT: You can put that aside and 3 be fair and impartial in this case? 4 JUROR NUMBER 4: It's been a long time. 5 THE COURT: Okay. 6 MS. VASQUEZ: Thank you. 7 JUROR NUMBER 4: Uh-huh. 8 MS. VASQUEZ: Number 26. 9 THE COURT: Yes, sir. 10 JUROR NUMBER 26: So, personally, 11 nothing on record, but I've been abused 12 domestically. My history, my grandfather, my 13 father, pretty much everyone. My wife's side, 14 very verbally abusive. Now that this is all 15 coming up, I couldn't be completely unbiased, to 16 be honest with you. It's bringing up a lot of -- 17 THE COURT: It's hindering you. 18 JUROR NUMBER 26: Yeah. 19 THE COURT: That's why we ask these 20 questions. We want to make sure. You don't think 21 you could sit in this case and be fair, that would 22 be in the back of your head the whole time?	188	1 lot, and they are broken up at the moment. I 2 don't know that it ever got physical, but it was 3 to the point my mom had to go down to South 4 Carolina to take care of my brother. So nothing, 5 like, legally happened 6 THE COURT: Okay. 7 JUROR NUMBER 28: But it was volatile. 8 THE COURT: I assume that will not be 9 in your way of being fair and impartial? 10 JUROR NUMBER 28: No. 11 THE COURT: But thank you for adding 12 that. 13 MS. VASQUEZ: Thank you. 14 THE COURT: Okay. The next juror. 15 THE BAILIFF: Juror 31, please, come 16 forward. 31. 17 THE COURT: No, 21, you can stay. 18 All right. Ma'am, I'm going to ask you 19 every question that you've heard so far. 20 I know you've been listening to the 21 questions, so based on all the questions that have 22 been asked, is there any answer that would differ

Transcript of Jury Trial - Day 1  
Conducted on April 11, 2022

189	1 or that you would want to bring to our attention? 2 JUROR NUMBER 31: The people who are in 3 the medical field, my daughter's a nurse. And 4 person who's trained in the legal field, my 5 daughter is a lawyer, she's trying to pass the 6 bar, and got a job at the contract section at 7 Universal Studios. 8 MS. VASQUEZ: At Universal Studios in 9 Los Angeles? 10 JUROR NUMBER 31: Yes, so excited. 11 MS. VASQUEZ: She also works in 12 entertainment? 13 JUROR NUMBER 31: Yes. 14 MS. VASQUEZ: Okay. 15 JUROR NUMBER 31: Yes. She just began 16 her job two weeks ago. 17 MS. VASQUEZ: Okay. Number 29 is 18 raising his hand. 19 THE COURT: Do you have something to 20 add also? Do you have anything else to add, 21 ma'am? Are you good? 22 Yes, sir?	191	1 Actually, my daughter, she knew that I had the 2 jury duty and she was telling me, there's a trial 3 going on and there's a Johnny Depp trial in 4 Fairfax, maybe you would be on it. So, that's the 5 first time I heard of him, actually. I don't 6 watch a lot of television. 7 MS. VASQUEZ: Is that something that 8 maybe we discuss in sidebar, about what she's 9 heard about the case from her daughter? 10 THE COURT: Did you hear specifics 11 about the case? 12 JUROR NUMBER 31: No, I didn't. 13 THE COURT: Okay. We're good. 14 MS. VASQUEZ: Thank you, Your Honor. 15 Thank you. 16 Have you formed any negative opinions 17 of Johnny Depp based on something you heard or 18 movies with him? 19 JUROR NUMBER 31: I don't know anything 20 about the case or him. 21 MS. VASQUEZ: Or about Mr. Depp? 22 JUROR NUMBER 31: No.
190	1 JUROR NUMBER 29: I believe I misheard 2 the question about the legal training. 3 MS. VASQUEZ: Yeah. 4 JUROR NUMBER 29: I have three active 5 lawyers in my family and one retired clerk. So I 6 don't know if that changes anything, but, yeah. 7 MS. VASQUEZ: They work here in 8 Virginia? 9 JUROR NUMBER 29: No. Two of them work 10 in California and one works in Georgia. 11 MS. VASQUEZ: Okay. And the retired 12 clerk also? 13 JUROR NUMBER 29: Also in Georgia. 14 MS. VASQUEZ: Great. Thank you. 15 Your Honor, with your lead, may I ask a 16 couple questions I asked previously, just with 17 Juror 31? 18 THE COURT: Sure. 19 MS. VASQUEZ: Thank you. 20 Have you read or heard of something 21 about my client, Johnny Depp, other than film? 22 JUROR NUMBER 31: I really have not.	192	1 MS. VASQUEZ: Are you a member or 2 active participate in any groups that identify 3 with the Me Too movement? 4 JUROR NUMBER 31: No, I'm not. 5 MS. VASQUEZ: Okay. And do you hold 6 the opinion that a person's account of abuse 7 should be believed without question? 8 JUROR NUMBER 31: No. 9 MS. VASQUEZ: Do you feel you can be 10 fair and impartial even though there are 11 allegations that happened in the case with sexual 12 assault? 13 Have any of you -- thank you very much, 14 31. I think you're up to speed now. 15 Have any of you ever served on a jury 16 before? By a show of hands. 17 Number 2. Was it a civil or criminal 18 trial? 19 JUROR NUMBER 2: Criminal. 20 MS. VASQUEZ: Criminal. 21 And how long ago? 22 JUROR NUMBER 2: It was probably four

Transcript of Jury Trial - Day 1  
Conducted on April 11, 2022

49 (193 to 196)

193	1 or five years ago. 2 MS. VASQUEZ: And were you ever the 3 jury foreperson? 4 JUROR NUMBER 2: No. 5 MS. VASQUEZ: How would you describe 6 your experience, just generally speaking? 7 JUROR NUMBER 2: Interesting. You see 8 a lot in the courtroom. 9 MS. VASQUEZ: Thank you very much. 10 Anybody in the first row? 11 Number 15. 12 JUROR NUMBER 15: So on the jury for 13 two different cases, 20 and 24 years ago. 14 MS. VASQUEZ: Okay. Two different 15 cases. 16 Were they civil or criminal? 17 JUROR NUMBER 15: One civil, one 18 criminal. 19 MS. VASQUEZ: And you said 20 years 20 ago? 21 JUROR NUMBER 15: Over 20 years ago. 22 MS. VASQUEZ: And were you ever the	195	1 in a civil lawsuit? No? 2 Number 16. Apologies. 3 JUROR NUMBER 16: My mom, she was in a 4 case with a father taking the child away from the 5 mother. 6 MS. VASQUEZ: So that was -- was she a 7 juror or? 8 JUROR NUMBER 16: Oh, she was a juror. 9 MS. VASQUEZ: Okay. Sorry. Let me 10 make that a little more clear. As a party. 11 Have you or anyone in your family ever 12 been involved in a civil lawsuit as a party? So, 13 as a plaintiff or defendant or a witness. 14 Number 28. 15 JUROR NUMBER 28: Yes, my family was in 16 a car accident. I think it was for the balance 17 after what the insurance company wouldn't cover. 18 MS. VASQUEZ: When you say your 19 family -- 20 JUROR NUMBER 28: I was a minor at the 21 time, so it was my parents. 22 MS. VASQUEZ: How old were you at the
194	1 jury foreperson? 2 JUROR NUMBER 15: No. 3 MS. VASQUEZ: How would you describe 4 your experiences? 5 JUROR NUMBER 15: Eye-opening. 6 MS. VASQUEZ: Eye-opening. 7 Number 18. 8 JUROR NUMBER 18: I served on a 9 criminal jury trial in Loudoun County in, 10 probably, 2007. 11 MS. VASQUEZ: Okay. Were you the jury 12 foreperson? 13 JUROR NUMBER 18: No. 14 MS. VASQUEZ: And how would you 15 describe your experience? 16 JUROR NUMBER 18: I studied criminal 17 justice in college, so I'm one that enjoys being 18 on the jury. 19 MS. VASQUEZ: Anyone else? 20 Have any of you or anyone in your 21 family ever been involved in civil lawsuits? 22 Anyone or family member been involved	196	1 time? 2 JUROR NUMBER 28: I was 15. 3 MS. VASQUEZ: 15. 4 Anyone else? 5 Number 31. Come in. Would you like to 6 approach the bench? 7 THE COURT: Yes, ma'am. 8 JUROR NUMBER 31: My husband was 9 accused for sexual harassment a couple years ago, 10 but it's been settled out of court. 11 THE COURT: Okay. 12 JUROR NUMBER 31: And everything is all 13 good. 14 THE COURT: Okay. 15 JUROR NUMBER 31: So, it's from an 16 employee, a waitress. My husband was the owner. 17 THE COURT: Okay. It's all been 18 resolved now? 19 JUROR NUMBER 31: Yeah, it's been 20 resolved. I mean, there was some stuff going on, 21 like, green card and stuff. It was a false 22 accusation.

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

24327

Transcript of Jury Trial - Day 1  
Conducted on April 11, 2022

50 (197 to 200)

197	<p>1 THE COURT: I understand. 2 Anything with that experience that 3 would affect you to be fair and impartial in this 4 case? 5 JUROR NUMBER 31: I don't think so. 6 THE COURT: Any follow-up to that? 7 MS. VASQUEZ: No. Thank you very much. 8 Jury service is a sacrifice, and we 9 understand that all of you have other places to be 10 today and for the next couple weeks, so I need to 11 ask you if there's anyone here who thinks it's 12 unfair for Johnny Depp to bring this case? By a 13 show of hands. Anyone that feels it's unfair for 14 my client to bring this case? Would that affect 15 anybody? 16 Does anyone feel that it's unfair that 17 jurors have to sit through a long trial such as 18 this? By a show of hands, anybody? 19 Do you hold a strong negative opinion 20 of people who use crude or foul language? By a 21 show of hands, does anyone hold a negative opinion 22 for anyone who uses crude or foul language?</p>	199	<p>1 I'm just going to read for you a 2 potential list of witnesses who may be called by 3 Mr. Depp, my client, either live or by video 4 deposition. Will you, please, let me know, at the 5 end of me reading the list, whether you know any 6 of these witnesses personally, okay? 7 I have a long list, so bear with me. 8 John C. Depp, II, Mr. Depp; Sean Bett, 9 Gina Deuters, Stephen Deuters, Ben King, Malcolm 10 Connolly, Travis McGivern, Starling Jenkins, 11 Dr. David Kipper, Isaac Baruch, Kevin Murphy, 12 Christian Carino, Christi Dembrowski, Tara 13 Roberts, Edward White, Sam Sarkar, Paul Bettany, 14 Keenan Wyatt, Jack Whigham, Leonard Damian, Robin 15 Baum, Andy Milner, Samantha McMillen, Adam 16 Waldman, Trinity Esparza, Kate James, Shannon 17 Curry, Richard Gilbert, Richard Marks, Michael 18 Spindler, Doug Bania, Brian Neumeister, Kimberly 19 Ann Collins, Dr. Richard Shaw, Rachel Frost. 20 Anyone? 21 THE COURT: All right. 22 MS. VASQUEZ: Thank you very much, Your</p>
198	<p>1 Would anyone here have any difficulty 2 hearing or discussing evidence and testimony about 3 allegations of domestic abuse or sexual assault? 4 Anyone have any difficulty or would have 5 difficulty hearing or discussing evidence and 6 testimony about allegations of domestic abuse or 7 sexual assault? 8 And based on everything you've heard so 9 far, is there anything about this case that makes 10 you question whether you could be completely fair 11 and impartial to both parties? By a show of 12 hands, anything? 13 If you find the evidence through this 14 trial supports Mr. Depp's claim that Ms. Heard -- 15 excuse me, Mr. Depp's claims against Ms. Heard, 16 would you have any difficulty finding for him and 17 awarding damages given his status as a celebrity? 18 Let me repeat the question. 19 If you find that the evidence in this 20 trial support Mr. Depp's claims against Ms. Heard, 21 would you have any difficulty finding for him and 22 awarding damages given his celebrity status? No?</p>	200	<p>1 Honor. And thank you all for your honesty and 2 your attention. 3 THE COURT: Would you like the LIN? 4 MS. BREDEHOFT: Yes, yes. 5 Good afternoon. Thank you all very, 6 very much for being here. We very much appreciate 7 this. I'm a huge believer in the jury system. 8 And we can't do it without, and we really 9 appreciate it. 10 Let me start with introductions. My 11 name is Elaine Charlson Bredehofs. I'm with the 12 firm of Charlson Bredehofs Cohen Brown &amp; 13 Nadelhaft. With me and my team is Ben Rottenborn, 14 he's a partner at Wood Rogers in Roanoke, 15 Virginia, and my partner Adam Nadelhaft, who is 16 also with my firm. You will also hear -- let's 17 give this another try. 18 How's this? 19 JUROR: Good, thank you. 20 MS. BREDEHOFT: Testing, testing. 21 Good? Thank you, thank you. 22 Okay. Also part of our legal team, you</p>

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

24328

<p style="text-align: right;">201</p> <p>1 will see and hear from occasionally includes Josh 2 Treece, Clarissa Pintado, David Murphy, Karen 3 Stemland, and Elaine McCarthy. In addition to 4 that, you will see, from time to time, part of our 5 paralegal and our legal staff, Michelle Bredehoft, 6 Heather Colson, Leslie Kopp, Alexandra Bredehoft, 7 and Kathy Baker. Together, our team represents 8 Amber Heard, the defendant and counterclaimant in 9 this case.</p> <p>10 Have any of you ever heard any of those 11 names? Do you know those people, kids, school, 12 anything like that?</p> <p>13 Now, I'm going to read my list of 14 witnesses early on and it's going to be a long 15 one. You're not going to hear from all these 16 witnesses, just as you're not going to hear from 17 theirs. We couldn't put them all on and be done 18 in six weeks but they are all potential and 19 possibilities, depends on how the evidence 20 developments over the case.</p> <p>21 Amber Heard -- what I would like you to 22 do is just raise your hand if you know any of</p>	<p style="text-align: right;">203</p> <p>1 brought here by both Ms. Heard and Mr. Depp, who 2 are in California and the vast majority of the 3 witnesses are out in California, many, many of the 4 witnesses that you will hear in this case are by 5 deposition designation. What's happened is we've 6 taken their deposition, both sides, I've asked 7 questions, they've asked questions or they've 8 asked questions and I asked questions, therefore 9 one of my team and their team, and what we do is 10 we, what is called designate, we highlight what we 11 want to have before you. And any objections, we 12 argued before the Court. The Court makes the 13 rulings, and then they're spliced, they're all by 14 video, they splice the video, except for one, I 15 think there's a deposition that isn't. So it's 16 spliced. So when you hear that, when you see it, 17 they're going to play videos to you, and it's 18 going to have questions and answers from both 19 sides and it's not necessary, I may have 20 designated, for example, something that one of 21 them asked and they may have designated something 22 that I have asked. But for convenience and to</p>
<p style="text-align: right;">202</p> <p>1 these people or if you feel, in some way, you have 2 some strong view of them or that might impact you 3 if you actually heard from them.</p> <p>4 Adir Abergel, Julian Ackert, Kathryn 5 Arnold, Amy Banks, Ellen Barkin, Lisa Beane, Adam 6 Bercovici, Alan Blaustein, Jacob Bloom, Cowan 7 Connell, Candie Davidson-Goldbronn, Laura 8 Divenere, Josh Drew, Erin Boerum-Falati, James 9 Franco, Officer William Gatlin, Eric George, Jodi 10 Gottlieb, Cornelius Harrell, Whitney Henriquez, 11 Dawn Hughes, Melanie Inglessis, Allen Jacobs, 12 Bonnie Jacobs, Tracey Jacobs, lots of Jacobs, 13 Michelle Jordan, Taylor Kouvelis, Jessica 14 Kovacevic, Sergeant Armand Lemoyne, Debbie Lloyd, 15 Officer Roberto Lopez, Joel Mandel, Elizabeth 16 Marz, Brandon McCulloh, Richard Moore, Michelle 17 Mulrooney, Elon Musk, Raquel Pennington, Anthony 18 Romero, Sergeant Marie Sandanaga, Rami Sarabi, 19 Ronald Schnell, Kristy Sexton, David Spiegel, IO 20 Tilet Wright, Tasya van Ree, Bruce Witkin, and 21 Benjamin Wizner.</p> <p>22 Now, in this case, because the case was</p>	<p style="text-align: right;">204</p> <p>1 move this along, the entire video will be played 2 at the same time.</p> <p>3 Is there anyone here that will have any 4 difficulty with determining, keeping an open mind 5 about what the evidence is and listen to it, 6 regardless if it's played in the plaintiff's case 7 or the defendant's case, understanding that both 8 sides have put in their question? Will anybody 9 have any difficulty with that?</p> <p>10 Will anybody have any difficulty in 11 giving the same weight to the testimony of these 12 people who are through video depositions to 13 someone who might be on the stand? Is there 14 anyone who might be more influenced by the person 15 on the stand than these people who have also 16 testified under oath?</p> <p>17 Thank you.</p> <p>18 Now, for purposes of my questions after 19 this, and I know some of this you've been thinking 20 about, either when the Court was asking it or when 21 Ms. Vasquez was asking. I'm going to define you 22 as yourself, as well as significant family members</p>

<p style="text-align: right;">205</p> <p>1 including spouse, children, parents, siblings, and 2 their families and close friends. 3 Now, I earlier introduced you to the 4 lawyers in our firms. Charlson Bredehopt Cohen 5 Brown &amp; Nadelhaft, we're located in Reston, 6 Virginia. And Woods Rogers have offices in 7 Roanoke, Charlottesville, Richmond and Lynchburg. 8 Has anyone ever contacted either of 9 these firms for representation? 10 Has anyone ever been represented by 11 either of these firms? Have any of you ever been 12 involved in any litigation in which either of 13 these firms was on the other side? 14 Now, I'm going to ask you the same 15 thing for counsel for Mr. Depp, who is represented 16 by Brown Rudnick. The attorneys have been 17 introduced to you. The attorneys are located in 18 Washington, D.C., California, Boston, and New 19 York. 20 Has anyone ever contacted any of these 21 attorneys or their law firm for representation or 22 been represented by them?</p>	<p style="text-align: right;">207</p> <p>1 Okay. Now, you've been asked a lot of 2 questions by the Court, as well as counsel for 3 Mr. Depp, about your knowledge and understanding 4 of Mr. Depp. I'm just going to ask a few more 5 follow-up questions to that. 6 How many of you have seen more than 7 three films of Mr. Depp's? And now I'm going to 8 keep going so we can slow this down. 9 How many of you have seen more than 10 five films of Mr. Depp? 11 How many of you have seen more than 12 seven? Well, that takes out my asking any more. 13 Okay. Thank you. 14 Have any of you seen Mr. Depp in any 15 commercials, most recently, the Dior Sauvage 16 cologne commercial? 17 How many of you have a favorable 18 opinion of Mr. Depp coming into this litigation, 19 in this case? 20 JUROR: What do you mean by 21 "favorable"? 22 MS. BREDEHOFT: That's a good point.</p>
<p style="text-align: right;">206</p> <p>1 Have any of you ever been involved in 2 on the other side of litigation involving this law 3 firm? 4 Okay. Now, I served as a substitute 5 judge in the General District Court in Fairfax 6 Circuit Court -- Fairfax General District Court 7 and Juvenile Domestic Relations Court in 1998 to 8 2014. Has anyone here appeared in front of me in 9 either a Fairfax Juvenile Domestic Relations Court 10 or the General District Court? 11 Now, you've been asked a lot of 12 questions about the training, which will make my 13 job a lot easier here. But I'm not sure that we 14 have completely cleared whether everyone, anyone 15 has ever been trained or has served as a police 16 officer. Some of you identified and answered the 17 question when it was talking about legal training. 18 Is there anyone here, and it's you, 19 including my definition, who has served as a 20 police officer, or law enforcement, other than the 21 ones who have already answered because I know we 22 have ones that have answered and we have those?</p>	<p style="text-align: right;">208</p> <p>1 How many of you like Mr. Depp or you 2 think positive things about him? Okay. 3 I'll ask the flip. How many of you 4 came in -- oh, go ahead. Okay. 5 So, okay. Positive in what way? This 6 is Juror 28. 7 JUROR NUMBER 28: My memory might be 8 failing me, but I think I saw one time where he 9 dressed up like someone, like his Pirates of the 10 Caribbean character, for, I think, a kid in this 11 hospital, but it's a while ago, so I don't know if 12 I'm remembering that correctly. 13 MS. BREDEHOFT: Other than that memory, 14 do you have any other positive memories of 15 Mr. Depp? 16 Now, do you believe, because you had 17 that positive view of Mr. Depp, you would have 18 difficulty believing testimony or evidence that 19 portrays Mr. Depp in an unfavorable light? 20 JUROR NUMBER 28: No. 21 MS. BREDEHOFT: Do you believe, because 22 you have a favorable impression of Mr. Depp as an</p>

Transcript of Jury Trial - Day 1  
Conducted on April 11, 2022

209	211
<p>1 actor, that you would ignore evidence or testimony 2 that's negative towards Mr. Depp? 3 JUROR NUMBER 28: No. 4 MS. BREDEHOFT: I'm going to ask that 5 of the rest of you as well. Based on the fact 6 that a number of you have seen three, five, or 7 more films of Mr. Depp, would any of you, because 8 you've watched those, and he's been in them, he's 9 done some great roles, I love Pirates, Jack 10 Sparrow, would any of you have difficulty, as a 11 result of that, being able to hear the evidence 12 and testimony in this case that may portray him in 13 a different light than his characters? Okay. 14 Do you believe that people may act 15 differently in public than they do in private? 16 I'll ask the flip of that. Is there 17 anyone here who believes that people act the same 18 in public as they do in private? Okay. Thank 19 you. 20 Now, I'm going to talk a little bit 21 about Amber Heard. Counsel for Mr. Depp has asked 22 you a little bit about this, and what I'm going to</p>	<p>1 Post in December of 2018. 2 Does anyone here have a negative view 3 of the Washington Post? 4 Okay. Number 11. Let me get the mic. 5 Thank you. 6 JUROR NUMBER 11: It doesn't express my 7 values. 8 MS. BREDEHOFT: In what way? 9 JUROR NUMBER 11: Many ways. 10 MS. BREDEHOFT: Would you prefer to go 11 to the bench on this? You might be more 12 comfortable. 13 JUROR NUMBER 11: Yes. 14 I just feel that slander, the news that 15 we get in the Washington Post and I don't think 16 they always -- they have too many Pinocchios for 17 their paper. 18 THE COURT: I understand what you're 19 saying. Anybody have any follow-up questions? 20 MS. BREDEHOFT: I do. The fact that 21 there was an op-ed published in the Washington 22 Post by Ms. Heard, would that impact you or cause</p>
210	212
<p>1 ask is, how many of you have seen more than one 2 movie of Amber Heard, in which she was in? Well, 3 then I can't get to three or five or seven. 4 Okay. For those of you, there were a 5 couple of you who said you had seen Aquaman. 6 Based on that, did you have a favorable opinion of 7 Amber Heard? 8 Have any of you ever seen Amber Heard 9 in the L'Oreal campaign commercials? 10 How many of you have had a favorable 11 opinion of Amber Heard coming into this trial? 12 How many of you have had an unfavorable 13 opinion of Amber Heard coming into this trial? 14 Since I have no show of hands for both 15 of those, I'm going to say how many of you are 16 coming into this with a completely neutral opinion 17 of Amber Heard? Thank you. That was unanimous. 18 Thank you. 19 All right. Now, Mr. Depp filed a 20 complaint against Amber Heard alleging that Amber 21 Heard defamed him in writing an op-ed, opinion 22 editorial, that was published in the Washington</p>	<p>1 you to think less of Ms. Heard? 2 JUROR NUMBER 11: No. I don't even 3 think -- we discontinued it. I've never read it. 4 MS. BREDEHOFT: Okay. 5 THE COURT: So it wouldn't affect you 6 as a juror? 7 JUROR NUMBER 11: No. 8 MS. BREDEHOFT: Thank you very much. 9 MS. VASQUEZ: Thank you. 10 MS. BREDEHOFT: Now, I know this 11 juror's opinion, but I'm going to ask the rest of 12 you. Does anyone think that if a story or an 13 op-ed appears in the Washington Post, that it must 14 be true? 15 Does anyone think that if a story or 16 op-ed appears in the Washington Post, that it must 17 be false? 18 Does anyone believe that people should 19 not write op-eds to express their opinions or 20 advocate opinions on matters of public concern? 21 Anyone have a negative view of people who write 22 op-eds?</p>

<p style="text-align: right;">213</p> <p>1 Does anyone believe that people's 2 opinions should be protected when they're 3 expressed in the form of an op-ed? 4 Now, I'm going to turn to a little bit 5 of domestic abuse. You've been asked a number of 6 questions, so I will try to limit mine. 7 Do you know of anyone who has been 8 falsely accused of domestic abuse? And the 9 "yous," again, are close family members, close 10 friends. 11 Okay. Does anyone here believe that if 12 a spouse hits their partner, that the partner 13 cannot and should not hit back or otherwise defend 14 themselves against being hit? 15 And if they do hit back, or otherwise 16 defend themselves, does anyone here believe that 17 the abuse is mutual or that they're both equally 18 at fault? 19 Does anyone believe that a spouse who 20 has been the victim of repeated abuse cannot hit 21 first, even as a preemptive strike in anticipation 22 of trying to stave off further abuse?</p>	<p style="text-align: right;">215</p> <p>1 Does anyone believe that victims of 2 domestic abuse always immediately leave their 3 abuser? 4 Does anyone believe that victims of 5 domestic abuse almost immediately tell someone 6 else? 7 Does anyone believe that victims of 8 domestic abuse would not attempt to cover up their 9 injuries to avoid people seeing them and noticing? 10 Does anyone believe that a victim of 11 domestic violence should leave her abuser and is 12 as much to blame if they stayed in the 13 relationship? 14 Does anyone believe the fact that a 15 person who was abused as a child justifies being 16 abused in adult life? 17 Does anyone believe the fact that a 18 person who was abused as a child justifies or 19 excuses their being an abuser in adult life? 20 Does anyone here believe that if you're 21 not professionally trained as a doctor or other 22 healthcare professional in the field of domestic</p>
<p style="text-align: right;">214</p> <p>1 Does anyone believe that verbal 2 arguments, including mere insults and 3 name-calling, justifies one or the other 4 escalating to a physical fight? 5 Does anyone believe that a husband 6 cannot rape or sexually assault his wife? Let me 7 ask that again. You look confused. Does anyone 8 believe that a husband cannot rape or sexually 9 assault his wife? In other words -- 10 JUROR NUMBER 2: Oh, right, right, 11 right. Understood. 12 MS. BREDEHOFT: I saw a little 13 confusion. 14 Does anyone believe that victims of 15 domestic abuse always call the police and 16 cooperate fully in the investigation? 17 Does anyone believe that victims of 18 domestic abuse always have immediately visible 19 marks or injuries? 20 Does anyone believe that victims of 21 domestic abuse always immediately seek medical 22 attention?</p>	<p style="text-align: right;">216</p> <p>1 abuse or IPV, intimate partner violence, that you 2 know how people should act or do act in these 3 situations? In other words, do you already have 4 preformed views, even if you don't have training, 5 of how you think someone who was a victim of abuse 6 should act? 7 Do you believe the police always have 8 to be called in domestic abuse cases? 9 Would you hold it against the victim if 10 they did not call or cooperate with the police? 11 Do you believe that a victim of 12 domestic abuse always has to seek medical 13 treatment? 14 Would you hold it against the victim if 15 they did not seek medical treatment? 16 Does anyone here believe that if only 17 the two people involved in the domestic abuse were 18 the witnesses to it, that they can never find 19 somebody liable for domestic abuse? Does anyone 20 think that during the attack, the victims should 21 ordinarily have time and ability to film the 22 attack?</p>

217	1 Do you understand that not everything 2 can be captured as quickly by picture or video? 3 Would you disbelieve the victim because 4 they were unable to capture the abuse on film or 5 video? 6 I'm going to talk a little bit about 7 the role of alcohol and drugs. 8 Have any of you been told by anyone 9 that you engaged in any type of aggressive or 10 abusive conduct while you were drunk or using 11 drugs? 12 Do any of you believe that someone 13 using alcohol and drugs may be more likely to 14 engage in domestic abuse? 15 Do any of you believe that people who 16 are engaging in drug or alcohol abuse are less 17 likely to engage in domestic abuse? 18 Okay. The rest of you probably don't 19 have an opinion one way or the other. Okay. 20 Do any of you believe that if a person 21 is high or drunk, that they are not at fault for 22 engaging in domestic abuse?	219	1 THE COURT: Any of those experiences 2 affect your ability to be fair and impartial here? 3 JUROR NUMBER 20: I don't think so. 4 THE COURT: All right. Thank you. 5 MS. BREDEHOFT: I'm very close. 6 THE COURT: That's fine. You can go 7 back. 8 Those last couple of questions weren't 9 on our script. 10 MS. BREDEHOFT: Your Honor, I spent a 11 lot of time -- 12 THE COURT: I'm telling you they 13 weren't. I've been following our script. I 14 mean -- 15 MS. BREDEHOFT: My apologies. 16 THE COURT: They're done now. I want 17 to make sure there's no more that aren't on our 18 script. 19 MS. BREDEHOFT: My apologies, I spent a 20 lot of time with that transcript. 21 THE COURT: I'm just concerned that we 22 stay. It hasn't veered off too much, but there
218	1 Does anyone believe that suspicions of 2 your significant other cheating on you justifies 3 domestic abuse? 4 Do you believe that jealousy can be the 5 cause of domestic abuse? Just a show of hands, 6 how many of you think that can be, jealousy can be 7 a cause of domestic abuse? Thank you very much. 8 Do you know anyone who became so angry 9 that they've destroyed property? 10 Two jurors raised their hand, 28, 20, 11 and 21. 12 Other than what you've already 13 discussed with us at the bench, is there something 14 beyond that? Okay. Then I'm going to ask you 15 each to approach the bench. 16 Oh, you said no. 17 Number 20, can we have you? Thank you. 18 JUROR NUMBER 20: I have a friend who 19 would smash things, and then my brother also had 20 anger issues growing up, so he would also smash 21 things. I think that's it. 22 MS. BREDEHOFT: Yes.	220	1 are a couple of questions that clearly were not 2 ones that you had on there. 3 MS. BREDEHOFT: Okay. 4 THE COURT: I just want to make sure 5 that you're sticking to the script. 6 MS. BREDEHOFT: I genuinely thought I 7 had. 8 THE COURT: Genuinely or not, I don't 9 want it to go off the script. 10 MS. VASQUEZ: They weren't on our 11 script either, Your Honor. 12 MS. BREDEHOFT: Okay. 13 MS. VASQUEZ: Just to note. These are 14 amounting, to -- Your Honor, she's not even asking 15 questions. 16 THE COURT: But these are the 17 questions -- most of them are the questions we 18 went through, that's fine. We'll keep going. I'm 19 assuming -- 20 MS. BREDEHOFT: Which ones were not? 21 THE COURT: The filming ones were ones 22 we had taken out. Also, the ones we took out

Transcript of Jury Trial - Day 1  
Conducted on April 11, 2022

56 (221 to 224)

<p style="text-align: right;">221</p> <p>1 something. I can't remember which one. It wasn't 2 even on my script, you said it, and it didn't show 3 up on my script. But that's okay. I don't want 4 to go backwards. 5 MS. BREDEHOFT: Okay. 6 THE COURT: Just going forward. 7 MS. BREDEHOFT: Okay. 8 THE COURT: I just don't want to call 9 you out in the middle of it. 10 MS. BREDEHOFT: Believe me, I apologize 11 because I did spend, literally, hours. 12 THE COURT: Okay. 13 MS. BREDEHOFT: Does anyone think it is 14 appropriate to destroy property in anger? Does 15 anyone think it is appropriate to destroy property 16 in anger. 17 Does anyone think it is appropriate to 18 destroy property in anger? 19 Is there anyone here that does not use 20 forms of social media? 21 Okay. And may I ask why? Oh, yeah, 22 thank you.</p>	<p style="text-align: right;">223</p> <p>1 MS. VASQUEZ: What was the question? 2 MS. BREDEHOFT: The question was, have 3 you ever signed on to any petition sent to you via 4 email or social media? 5 So, we have two, three. 6 Okay. Number 12, what were the 7 circumstances? 8 JUROR NUMBER 12: I'll wait for the 9 mic. 10 MS. BREDEHOFT: Yeah. Thank you. 11 Juror Number 12, go ahead. 12 JUROR NUMBER 12: My college was trying 13 to re -- they wanted to add -- they wanted to 14 reconstruct a library, and in the process, they 15 were going to move a whole bunch of books into 16 storage, which would have made research harder for 17 students, so I signed a petition to, you know, 18 change their plan. 19 MS. BREDEHOFT: Okay. Was that a 20 positive experience for you? 21 JUROR NUMBER 12: I mean, it was two 22 clicks and type my name.</p>
<p style="text-align: right;">222</p> <p>1 JUROR: I just believe I have a better 2 life without. I don't have an interest. It's not 3 important to me. 4 MS. BREDEHOFT: Probably a lot of 5 people who would think that. Thank you very much. 6 Do you believe. 7 JUROR NUMBER 10: I'm also in that 8 category. 9 MS. BREDEHOFT: Oh, you are too? 10 JUROR NUMBER 10: I don't really use 11 social media. 12 MS. BREDEHOFT: Okay. 13 JUROR NUMBER 10: The same thing. Just 14 not interested. 15 MS. BREDEHOFT: Okay. Do you believe a 16 person's reputation can be affected by what is 17 said on Twitter or other social media? How many 18 of you believe it can be impacted by that? 19 How many of you believe it cannot, that 20 it doesn't impact? 21 Have any of you ever signed a petition 22 sent to you via email or social media?</p>	<p style="text-align: right;">224</p> <p>1 MS. BREDEHOFT: It was an easy thing to 2 do and for a good cause? 3 JUROR NUMBER 12: Yes. 4 MS. BREDEHOFT: Okay. Thank you. 5 Then we have -- we'll come back to you. 6 JUROR NUMBER 28: I was wondering if 7 you could repeat the question a couple questions 8 ago about destroying property. 9 MS. BREDEHOFT: Oh. Does anyone think 10 it is appropriate to destroy property when angry? 11 Or the one before? 12 Do you know anyone who became so angry 13 they destroyed property? 14 JUROR NUMBER 28: Yes. If we could 15 talk at sidebar. 16 MS. BREDEHOFT: Okay. 17 THE COURT: Okay. 18 JUROR NUMBER 28: My brother. 19 THE COURT: If you could speak up just 20 a little bit. 21 JUROR NUMBER 28: My brother has been 22 known to break things when he gets really angry,</p>

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

24334

225	<p>1 so I didn't share that before, at least in 2 details, but I wanted to share that. That's all. 3 MS. BREDEHOFT: Would that impact you 4 at all with hearing the testimony of breaking 5 property, destroying property? 6 JUROR NUMBER 28: No. 7 MS. BREDEHOFT: Okay. 8 THE COURT: Very good. Thank you. 9 MS. BREDEHOFT: Now, with that done, 10 the petitions. And I think Juror Number 20 raised 11 their hand. 12 JUROR NUMBER 20: Just organizations 13 that I'm supporting, they sent me stuff in an 14 email, and like he said, click and -- two clicks 15 and you're done. 16 MS. BREDEHOFT: And you felt it was for 17 a good cause? 18 JUROR NUMBER 20: Uh-huh. 19 MS. BREDEHOFT: You too? 20 JUROR: It was just for the animal 21 cruelty act. It was sent to me via email, so I 22 signed that and sent it.</p>	227	<p>1 School sports. It was legislation to allow sports 2 to continue during COVID, and it was a positive 3 experience because I have children involved in 4 that and I wanted them to get out of the house. 5 Thank you. 6 MS. BREDEHOFT: Yes. Yes, that would 7 make it a very positive experience. Okay. Thank 8 you very much. 9 Do any of you ever tape-record or film 10 yourself or friends? Kind of an odd question. 11 THE COURT: I think it's still in the 12 social media context. Do you tape or film 13 yourself with friends on social media? 14 MS. BREDEHOFT: Yes. You do? 15 JUROR NUMBER 2: We run dog agility, so 16 we just film each other and our runs and post them 17 on social media. 18 MS. BREDEHOFT: Who else? 19 JUROR NUMBER 3: Well, mostly, sports 20 because I just don't pick up, like, a lot of info, 21 like, sports matters and sport teams on it. Other 22 than that, no.</p>
226	<p>1 MS. BREDEHOFT: For a good cause, 2 again? 3 JUROR: Yeah. 4 MS. BREDEHOFT: Thank you. 5 Number 16. 6 JUROR NUMBER 16: It was for the 7 formation of graduation, how to handle it. 8 MS. BREDEHOFT: Was this for graduation 9 from high school, college? 10 JUROR NUMBER 16: College. 11 MS. BREDEHOFT: What was the nature of 12 the petition? 13 JUROR NUMBER 16: To keep a profile of 14 major programs in separate graduations, not into 15 one. 16 MS. BREDEHOFT: Was it a positive 17 experience for you? 18 JUROR NUMBER 16: Yeah. 19 MS. BREDEHOFT: Okay. Thank you. 20 Juror Number 3 -- 2, 2. 21 JUROR NUMBER 2: I was emailed a 22 petition during COVID, it was for Loudoun High</p>	228	<p>1 MS. BREDEHOFT: All right. Thank you. 2 Number 4. 3 JUROR NUMBER 4: Just pictures of, 4 like, my dog, stuff like that. Something normal, 5 nothing crazy. 6 MS. BREDEHOFT: That's great. 7 Do we have one? Yeah, we have one, 8 then I'll come back. 9 JUROR NUMBER 29: Just me and my 10 brother and sisters share things with each other, 11 make fun of each other and tease each other. 12 MS. BREDEHOFT: Positive? 13 JUROR NUMBER 29: Yeah, it's always 14 positive. 15 MS. BREDEHOFT: Number 28, over here. 16 We should just give you your own microphone. 17 JUROR NUMBER 28: Similar to the other 18 answers, just, like, friends, family, pets. Just 19 positive. 20 MS. BREDEHOFT: Anybody else? 21 Would it surprise any of you to learn 22 that some famous people regularly film and</p>

Transcript of Jury Trial - Day 1  
Conducted on April 11, 2022

58 (229 to 232)

229	<p>1 tape-record each other? 2 You will hear testimony of Mr. Depp and 3 Amber Heard taping each other during sessions when 4 they were trying to work out some of their 5 differences and relationship issues. You will 6 hear and see some of those tape-recordings and 7 those videos. 8 Would anyone here be unable to consider 9 these tapes or portions played because they were 10 intended, at the time, to be private? 11 Amber Heard has had relationships with 12 both men and women. Some refer to this as 13 bisexual. Does anyone believe they cannot view 14 this case or Amber Heard in a fair and impartial 15 manner because they are uncomfortable with Amber's 16 sexual orientation? 17 There are several witnesses in this 18 case, some of whom will testify the complete 19 opposite of others who witnessed the same things. 20 Will anyone here have difficulty assessing the 21 motivations of the witnesses for telling the truth 22 under the circumstances?</p>	231	<p>1 JUROR NUMBER 12: That's all I know. 2 MS. BREDEHOFT: So, Number 12 knows 3 it's a tabloid. Do any of you have -- okay. 4 Go ahead, Juror Number 19. 5 JUROR NUMBER 19: Tabloid. 6 MS. BREDEHOFT: So you said tabloid. 7 Okay. So more of you have heard of it. 8 Do any of you have an opinion on the 9 quality of what's reported or an opinion of Daily 10 Mail, other than what you've identified? Okay. 11 Almost to the end. 12 You will hear some diametrically 13 opposing interpretations of evidence and 14 testimony, with one side sometimes emphatically 15 insisting their interpretation of the evidence or 16 the testimony is correct. 17 Do any of you believe that you will not 18 be able to exercise your own judgment, common 19 sense and memory, and that you will instead rely 20 on counsel's interpretations on behalf of his or 21 her client? In other words, can you look beyond 22 what the lawyers are insisting the evidence is and</p>
230	<p>1 You will hear testimony from several 2 police officers from the LAPD, that's the 3 Los Angeles Police Department. Do any of you have 4 any preformed bias that all police officers always 5 tell the truth? 6 Will you be able to listen to the 7 evidence with an open mind and consider any 8 motivations a police officer may have for being 9 less than truthful under certain circumstances? 10 Do any of you believe that you cannot 11 believe actors because they play various roles in 12 their careers? 13 Has anyone here been falsely accused of 14 committing perjury or filing false police reports? 15 Do any of you believe that a person 16 cannot be damaged emotionally based on words 17 published? 18 Do any of you know what the Daily Mail 19 is? 20 JUROR NUMBER 12: It's a tabloid, isn't 21 it? 22 MS. BREDEHOFT: Yeah.</p>	232	<p>1 say, no, I know what I heard and what I saw and 2 make a fair determination? 3 I have covered several topics and 4 issues that are likely to come up through this 5 trial. We all carry our own beliefs, biases and 6 opinions based on the many experiences in our 7 unique lives. The Court's questions, 8 Ms. Vasquez's questions, and my questions have 9 hopefully caused you to think about whether any of 10 the topic and areas that are arising may influence 11 you because of your life experiences, prejudices 12 and biases, such that after thinking about all of 13 this, you think you may have trouble viewing this 14 case completely, fairly, and impartially. 15 Have any of you come to that conclusion 16 at this point, that maybe you might have a problem 17 deciding, now that you've heard as much as you 18 have heard? 19 So all of you think, at this point, you 20 can keep an open mind and make your decisions? 21 That's great. 22 Is there any reason, after listening to</p>

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

24336

<p style="text-align: right;">233</p> <p>1 everything I've talked about, that you believe 2 that may prevent you from being completely fair 3 and impartial, anything? 4 Is there anyone here that believes they 5 would have difficulty or any reason they could not 6 find a verdict in favor of Amber Heard and award 7 her substantial damages if, and only if, the 8 evidence supports such a finding and award? 9 Thank you all very much. We very much 10 appreciate it. 11 THE COURT: Thank you, Counsel. 12 All right. 13 MS. VASQUEZ: One thing. 21, Your 14 Honor, she has a current temporary restraining 15 order against her boyfriend here in Fairfax, and I 16 know it's the Court's discretion, but I would ask 17 that she be struck for cause just because I think 18 these allegations, it's not fair for her to sit 19 here for weeks that could be really traumatic. 20 THE COURT: I asked her specifically if 21 she could be fair and open, and she said she 22 could.</p>	<p style="text-align: right;">235</p> <p>1 don't get on the jury, and don't jump up and down 2 if you don't get on the jury, either way. 3 But what I'm going to do now is to save 4 some time, I'm going to pretend you're all on the 5 jury and I'm going to go ahead and give you some 6 preliminary instructions so you'll understand how 7 the case is going to go and what kind of logistics 8 we're going to have. Okay? All right. 9 So, what's going to happen, the case 10 will be presented in the following order: First, 11 the plaintiff's attorney may make an opening 12 statement outlining the plaintiff's case. The 13 defendant's attorney may also make an opening 14 statement outlining the defense's case. In their 15 opening statements, the lawyers will tell you what 16 they expect the evidence to be. This should help 17 you understand the evidence as it is presented 18 later through the witnesses and make you aware of 19 any conflicts or differences that might arise in 20 the testimony. What the lawyers say in their 21 opening statements is not evidence, and you must 22 not consider it as evidence. Neither attorney is</p>
<p style="text-align: right;">234</p> <p>1 MS. VASQUEZ: I know. 2 THE COURT: She wasn't even sure she 3 had a protective order. I'm not even sure she had 4 a protective order. 5 MS. VASQUEZ: But it happened in the 6 last year or two. 7 THE COURT: I'm not going to do it. 8 She said she could be fair and impartial, and she 9 said she wouldn't be triggered or anything. 10 MS. VASQUEZ: Thank you. 11 THE COURT: All right. Are the 12 attorneys satisfied with the composition of the 13 jury panel? 14 MS. VASQUEZ: Yes, Your Honor. 15 THE COURT: Ladies and gentlemen, at 16 this time, we're getting closer. At this time, 17 what will happen is there are 21 of you on the 18 jury panel right now, and we have to get that down 19 to 11. What will happen now is the lawyers will 20 just exercise their own strikes and they'll go 21 back and forth until we get you down to that 11 22 people, okay? Don't take it personally if you</p>	<p style="text-align: right;">236</p> <p>1 required to make an opening statement. 2 After opening statements, the plaintiff 3 will introduce evidence. At the conclusion of the 4 plaintiff's case, the defendant has the right to 5 introduce evidence. And when the defendant rests, 6 the plaintiff may introduce rebuttal evidence. 7 Since there's a counterclaim in this case, the 8 defendant, then, has the right to introduce 9 rebuttal evidence after that. Okay? 10 At the conclusion of all the evidence, 11 I will give you further instructions of law, after 12 which the lawyers will make their closing 13 arguments. In the closing arguments, the lawyers 14 refer to the testimony and other evidence that you 15 have heard, but here again, what the lawyers say 16 in their closing arguments is not evidence itself. 17 Their statements are only their recollection of 18 what the evidence in the case was, and it is your 19 collective recollection, as seven jurors, to what 20 the evidence in the case was which should govern 21 your deliberation. 22 After closing arguments, you will</p>

<p style="text-align: right;">237</p> <p>1 retire, select a presiding juror, deliberate, and 2 arrive at your verdict. You must not be 3 influenced, in any degree, by any personal feeling 4 of sympathy for or bias against any party to this 5 suit, for each party is entitled to the same fair 6 and impartial consideration. The law applicable 7 to this suit is given to you in these instructions 8 and in other instructions that I'll give you at 9 the conclusion of all the evidence. It is your 10 duty as jurors and part of your oath as jurors 11 that you will follow all such instructions. 12 It's also your duty to determine the 13 facts of this case from the evidence and the 14 reasonable inferences arising from the evidence, 15 but in doing so, you must not engage in guesswork 16 or speculation. The evidence that you are to 17 consider consists of testimony of witnesses and 18 any exhibits entered into evidence. The admission 19 of evidence in court is governed by Rules of 20 Evidence that has been developed over the years. 21 The purpose of the Rules of Evidence is to protect 22 the fairness and accuracy of the fact-finding</p>	<p style="text-align: right;">239</p> <p>1 determination, you alone decide on the 2 believability of the evidence and its weight and 3 its value. 4 A great deal of the evidence that you 5 will hear in this case will be in the form of 6 testimony of witnesses, whether live witnesses, 7 remote witnesses or by deposition, video 8 deposition of witnesses, and taking into account 9 the weight and value that you choose to give the 10 testimony of any witness, you must consider the 11 appearance, attitude and behavior of the witness, 12 the interest of the witness in the outcome of the 13 suit, the relation of the witness to any party in 14 this suit, the inclination of the witness to speak 15 truthfully or not, the probability or 16 improbability of the witness' testimony, and all 17 other facts and circumstances in evidence. In 18 short, you may give the testimony of any witness 19 just such weight of any value that you determine 20 the testimony is entitled to receive. 21 You must decide this case based solely 22 on the evidence presented here within the four</p>
<p style="text-align: right;">238</p> <p>1 process in which you are engaged. From time to 2 time during the trial, it may be the duty of an 3 attorney to object to evidence as being offered. 4 Please don't hold it against the attorney making 5 the objection. He or she is not trying to hide 6 anything from you, instead, he or she is simply 7 trying to see to it that the case is conducted in 8 accordance with the Rules of Evidence. It's my 9 duty, as the judge, to rule on these objections 10 and determine whether you can consider certain 11 evidence; therefore, you must not consider any 12 evidence to which I sustain an objection or which 13 I direct you to disregard or I order to have 14 stricken from the record. 15 Okay? 16 It's important to keep in mind that no 17 statement or ruling or remark or gesture that I 18 make during the trial is intended to indicate to 19 you the opinions -- my opinion of the facts of the 20 case. It doesn't matter what I think about the 21 facts of this case. You are to determine the 22 facts of the case, yourself, and in this</p>	<p style="text-align: right;">240</p> <p>1 wall of the courtroom. This means that during the 2 trial, you must not conduct any independent 3 research about this case, the legal or factual 4 issues in the case, the individuals or 5 corporations involved in the case, you are not 6 permitted to search the Internet, visit websites, 7 consult dictionaries, or reference materials or 8 use any other tool to obtain any information of 9 this case or help resolve the issues of this case. 10 Do not try to find out any information from any 11 source outside the confines of this courtroom. 12 Until the case is submitted to you for 13 deliberation, you must not discuss this case with 14 anyone, that includes your fellow jurors. After 15 you retire to deliberate, you may discuss the case 16 only with your fellow jurors; however, those 17 discussions could occur only in the jury room and 18 only when all members of the jury are present. 19 You are not to discuss this case with anyone else 20 until your jury service as ended. This 21 prohibition of discussions includes the use of any 22 technology used to communicate with anybody, such</p>

Transcript of Jury Trial - Day 1  
Conducted on April 11, 2022

61 (241 to 244)

<p style="text-align: right;">241</p> <p>1 as telephone calls, text messages, email, chat 2 rooms, or any posts to social media, such as 3 Facebook, Twitter, Snapchat, Instagram or any 4 other websites or any other updates. 5 If anyone asks you about your jury 6 service while the case is pending, you can tell 7 them that you are in a civil trial, but you cannot 8 have any discussions about that case, and you 9 cannot hear anything that they want to say about 10 this case in particular. 11 Okay? 12 So it's very important that you 13 instruct everybody that you come in contact that 14 they cannot discuss this case with you at any 15 time. So keep an open mind, do not decide any 16 issue in this case until it's submitted to you for 17 your deliberations at the conclusion of all the 18 evidence and after you received the completion 19 instructions of law that I'll give you at the end 20 of this case. 21 If you would like to take notes during 22 this trial, you may do so. On the other hand,</p>	<p style="text-align: right;">243</p> <p>1 starting tomorrow with opening statements, but if 2 you do decide to take notes, you're going to be 3 given legal pads. I will just ask that you flip 4 over the first page, maybe put your name on the 5 first page, flip it over and start take notes on 6 the second page so you can cover them up during 7 breaks. And in the evening, at the evening, they 8 will be collected up and they'll be stored 9 securely. Jamie, my court clerk, will take care 10 of that. And they'll be given back to you for the 11 next day, for the next day's service. So, again, 12 that's your decision whether or not you want to 13 take notes. 14 We generally take a break midmorning, 15 around 11:15 or 11:30. We'll take lunch, usually, 16 from 1 to 2, based on how things are going. We'll 17 take an afternoon break at 3:15 or 3:30 and then 18 we'll conclude court each day by 5:00 p.m. But 19 today, we'll conclude court after we have paneled 20 the jury, okay? 21 If you want to bring your -- in the 22 jury assembly room, there's places where you can</p>
<p style="text-align: right;">242</p> <p>1 you're not required to take notes. Each of you 2 should make your own decision about this. If you 3 do decide to take notes, be careful not to get so 4 involved in the note-taking process that you 5 become distracted from the ongoing proceedings. 6 Your notes should be used only as an aid to your 7 memory. You should not give your notes precedence 8 over your independent recollection of the 9 evidence. Whether or not you take notes, you 10 should rely on your independent recollection of 11 what the evidence of the case was, and you should 12 not be unduly influenced by the notes of other 13 jurors. We do have a court reporter making a 14 record of this trial. We will not have written 15 transcripts of the record available for you to use 16 in reaching your decision in this case. In 17 addition, no testimony will be read back to you 18 during deliberations, so please keep that in mind 19 when deciding whether or not you want to take any 20 notes. The notes will not become part of the case 21 record and will be destroyed at the end of the 22 case. If you do decide to take notes, we'll be</p>	<p style="text-align: right;">244</p> <p>1 bring your lunch, if you'd like to bring your 2 lunch. We only have one cafeteria in the 3 building, and with only one hour, it's hard to 4 leave campus to go anywhere else to get lunch, so 5 we have a refrigerator and microwaves available to 6 you if you want to bring your lunch in as well. 7 I'd like to discuss a little bit about 8 alternates. We're going to have 11 empaneled as a 9 jury, and as I said earlier, when it comes to 10 deliberations, only 7 will be deliberating. 11 Because of the length of the case, we have four 12 alternate jurors that are going to be picked. 13 You're not going to know who the alternate jurors 14 are, alright? So you're going to hear all the 15 evidence, you're going to hear all the jury 16 instructions, you're going to hear closing 17 arguments. And then after closing arguments, 18 prior to deliberation, I'll be excusing four 19 jurors at that time and only seven will be going 20 into deliberations, okay? 21 What will happen is after we empanel a 22 jury, we will randomly, I and my clerk, will</p>

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

24339

Transcript of Jury Trial - Day 1  
Conducted on April 11, 2022

62 (245 to 248)

245	1 randomly select, at random, four jurors names that 2 are empaneled in the 11 and we will put them in an 3 envelope, so you won't know who those jurors are 4 going to be until the very end. So I would like 5 to bring that up now because some weeks from now, 6 some of you going to be very upset with me, and I 7 just want to just remind you that nothing was in 8 vein and we are having these alternates, so I just 9 wanted to be very upfront with you about the 10 alternates, that we do have four alternates coming 11 in, okay? 12 All right. So we'll just wait for them 13 to make their strikes. If you need to stand up 14 and stretch a little bit, feel free to do so, just 15 don't leave your seats, okay? 16 Just give them a few minutes to 17 conclude their strikes. 18 Do the attorneys have any issues with 19 the strikes? Any issues with the strikes? 20 MS. BREDEHOFT: No, Your Honor. 21 THE COURT: Okay. 22 THE CLERK: When I call your number,	247	1 THE CLERK: 25. 2 JUROR NUMBER 25: Yes. 3 THE CLERK: 27. 4 JUROR NUMBER 27: Yes. 5 THE CLERK: 29. 6 JUROR NUMBER 29: Yes. 7 THE COURT: Is this the jury you 8 selected? I just want to make sure. 9 MS. BREDEHOFT: That's correct, Your 10 Honor. 11 THE COURT: Okay. 12 THE CLERK: For those jurors that just 13 answered yes, please, stand and raise your right 14 hand and be sworn. 15 (Whereupon, the jury was administered 16 the oath in). 17 THE CLERK: Will the remaining jurors, 18 please, report back to the jury assembly room here 19 on the fifth floor. 20 THE COURT: Okay. If I can have 21 Number 15 and 16 go ahead and join the other 22 jurors in the jury box.
246	1 please have a seat in the back of the courtroom. 2 31, 28, 23, 21, 20, 19, 18, 12, 11, and 3 2. 4 Please answer yes when I call your 5 numbers. 6 3. 7 JUROR NUMBER 3: Yes. 8 THE CLERK: 4. 9 JUROR NUMBER 4: Yes. 10 THE CLERK: 6. 11 JUROR NUMBER 6; Yes. 12 THE CLERK: 10. 13 JUROR NUMBER 10: Yes. 14 15 THE CLERK: 14. 16 JUROR NUMBER 14: Yes. 17 THE CLERK: 15. 18 JUROR NUMBER 15: Yes. 19 THE CLERK: 16. 20 JUROR NUMBER 16: Yes. 21 THE CLERK: 22. 22 JUROR NUMBER 22: Yes.	248	1 Well, ladies and gentlemen, welcome. 2 What we're going to do now is we're going to go 3 ahead and excuse you for the day. It's important 4 that you're here a little earlier, we start at 5 10:00 tomorrow, but the deputy will take you back 6 to the jury room and he'll talk to you a little 7 bit before I discharge you today so you'll know 8 what to do tomorrow what's to be expected of you. 9 In addition, tomorrow when you come in, I think 10 we're going to leave the three seats at the end 11 empty, if you all could file in to the other 12 seats. Like I said before, once you pick a seat, 13 it's yours for the duration. We'll keep you there 14 just to make things easier. Anything you need, 15 make sure you let Deputy (indiscernible) know what 16 you need. My court clerk is Jamie, my law clerk 17 is Sammie. So we'll all be here with you on the 18 duration, so anything you need, make sure you let 19 us know, okay? We want to make this as 20 comfortable or you as possible. 21 So what I'm going to do, before I 22 discharge you, I'm going to give you the same

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

24340

Transcript of Jury Trial - Day 1  
Conducted on April 11, 2022

<p style="text-align: right;">249</p> <p>1 instructions that I gave you earlier today. 2 Actually, I'm probably going to give this 3 instruction to you every day, so by the end of 4 this trial, you'll probably be able to recite it 5 back to me, but I'm going to go ahead and give it 6 to you, again, today so we understand. Since 7 there is media coverage in this case, I want to 8 make it very important to you that you abide by 9 this instruction, okay? 10 So just as a reminder, the Court 11 instructs you as to the following: You are not 12 read anything about this case. You are not to 13 watch anything about the case. You are not to 14 listen to anything about this case. This applies 15 to television, newspapers, magazines, the 16 Internet, and any online sites. Further, you're 17 not to read, watch, or listening to anything about 18 the case on any social networking sites, such as 19 Twitter, Facebook, Instagram, Snapchat or similar 20 sites. 21 In addition, you must not communicate 22 with anyone about the case, whether in person,</p>	<p style="text-align: right;">251</p> <p>1 deputy sheriff, who will bring it to my attention 2 and decide how to proceed, and you must not share 3 any communication or information you acquire with 4 any fellow juror. 5 During the course of these proceedings, 6 you may find yourself in the elevator, the 7 restroom, the hallway or cafeteria, in line with 8 individuals associated with the case. The 9 attorneys and litigants know that they cannot talk 10 to you. Again, they're not being unfriendly, 11 rather they are prohibited from talking to you, 12 so, please, do the same. As for others, if 13 someone speaks to you about the case, remove 14 yourself from that encounter and, again, report it 15 to one of the deputy sheriffs. 16 Again, please remove any automatic 17 notifications on your cell phones, iPads or 18 computers that pop up automatically with news 19 stories. Just make sure you've disabled all of 20 those from any of your accounts. And we will go 21 forward from there, okay? 22 Just do not discuss the case with</p>
<p style="text-align: right;">250</p> <p>1 over the phone, by email, text or instant 2 messaging, or by any other electronic or 3 nonelectronic means. This includes your friends, 4 family, co-workers, acquaintances, and strangers. 5 I also instruct you that you cannot do any 6 research or make inquiries about this case, 7 whether online or by any other means. 8 For example, you cannot look up 9 information on the Internet that's related to this 10 case or related to the persons involved in the 11 case, nor may you consult dictionaries or other 12 reference materials. What you learn about this 13 case is limited to what you learn in the four 14 walls of this courtroom while the proceedings are 15 underway. You also may not communicate about this 16 case or the persons involved in the case with any 17 fellow juror or potential jurors until you have 18 been authorized to engage in deliberation. If at 19 any time you inadvertently see, hear, or read 20 anything about this case or the persons involved 21 in this case or someone says something to you 22 about the case, you are to promptly advise a</p>	<p style="text-align: right;">252</p> <p>1 anybody and, please, don't let them discuss it 2 with you. That's the thing, okay? 3 Yes, ma'am. 4 JUROR NUMBER 2: Can you state that 5 you're on the case? 6 THE COURT: You can state that you're 7 on this particular case. Just because there's so 8 much news media, I don't want somebody to 9 inadvertently start talking to you about this case 10 and they don't realize you're on this case. So, 11 you can let them know that you're on this specific 12 case, but you cannot talk to them and you don't 13 want to hear anything about it. So, you need to 14 live in that vacuum for the next several weeks, 15 okay? 16 JUROR NUMBER 2: Okay. 17 THE COURT: Anything else at this time? 18 You will be excused to the jury room, 19 and deputies will be there in a moment to talk to 20 you about logistics, okay? 21 You can have a seat for a moment. 22 We're just going to stop the feed from the</p>

Transcript of Jury Trial - Day 1  
Conducted on April 11, 2022

<p style="text-align: right;">253</p> <p>1 overflow courtroom, but IT says they need one 2 minute to do that, so we are going to wait until 3 we get the okay, and then go into our other 4 matters. 5 Would anybody want a break for a few 6 minutes? We can do that while we are waiting. 7 MS. BREDEHOFT: Yeah. 8 THE COURT: Let's go ahead and take a 9 ten-minute break. 10 MR. CHEW: Thank you, Your Honor. 11 THE BAILIFF: All rise. 12 (Recess taken from : 13 to : ) 14 THE BAILIFF: All rise. Please be 15 seated and come to order. 16 THE COURT: All right. So let's go 17 ahead pick our alternates. Now we are off in the 18 other courtroom. Let's just do that. 19 Yes, the number. 20 THE CLERK: 10, 15, 3, and 14. 21 THE COURT: Okay. Got that, 10, 15, 3, 22 and 14. Those are the alternates.</p>	<p style="text-align: right;">255</p> <p>1 THE COURT: Okay. 2 MS. BREDEHOFT: The first of those is 3 the U.K. judgment, Your Honor. 4 THE COURT: Okay. 5 MS. BREDEHOFT: Our clear understanding 6 of Your Honor's ruling was that if they open the 7 door by claiming damages because the U.K. judgment 8 is our defense to, you weren't harmed by the 9 op-ed, you were harmed by all these other things, 10 including the fact that there's a judgment against 11 you from the U.K. So we have in here, we have, we 12 agree that you said it's granted as to liability. 13 But you said denied in part to the extent Mr. Depp 14 opens the door by claiming damages. Then you also 15 said, in which case the U.K. judgment may be 16 admissible as determined during trial. And then 17 you said that we can't refer to it in our opening 18 statements. We, first, have to approach the 19 bench, and the Court may have appropriate limiting 20 instructions for the jury, if warranted. 21 What they want to put in there is only 22 if he relies on the U.K. judgment at trial, which</p>
<p style="text-align: right;">254</p> <p>1 We're going to put their numbers in an 2 envelope and they'll just stay in the envelope 3 until the end of the case, okay? All right. 4 Okay. So where are we with the Motion 5 in Limine? 6 MS. BREDEHOFT: Your Honor, 7 unfortunately, there's a couple of things on each 8 of them. And if I could hand up -- we have a 9 redline and then a clean of ours. Starting with 10 the -- 11 MR. MONIZ: Your Honor, if I can 12 briefly just hand up. 13 THE COURT: Yes, Mr. Moniz. 14 Thank you, Mr. Moniz. 15 MS. BREDEHOFT: The first one was the 16 Depp motions, the second was the Heard motions. I 17 think Depp's might be easier to start with. 18 THE COURT: Okay. 19 MS. BREDEHOFT: So we can go through 20 and if you can take the second one with the 21 redline, that's what's left that we're still 22 disagreeing about.</p>	<p style="text-align: right;">256</p> <p>1 makes no sense. He's not going to bring you the 2 U.K. judgment. That's not how he opens the door. 3 He opens the door saying, yes, I've been terribly 4 damaged, my career has been destroyed as a result 5 of this, and then we can come up and we can defend 6 and say this is one of the causes of the damages 7 you have. So, that's the difference. That 8 redline that you see in front of you, Your Honor, 9 is the differences between what we propose and 10 then what they're proposing. 11 THE COURT: Okay. Why don't we just do 12 one at a time. 13 MR. CHEW: Your Honor, Mr. Moniz is 14 going to -- 15 THE COURT: All right. Mr. Moniz. 16 MR. MONIZ: Thank you, Your Honor. I 17 apologize, I overly optimistic on Friday when I 18 said -- 19 THE COURT: You really promised me 20 something. You did not deliver. 21 MR. MONIZ: Not intentionally, Your 22 Honor. So I think that this is pretty</p>

<p style="text-align: right;">257</p> <p>1 straightforward here. What Ms. Heard is arguing, 2 essentially, is that if Ms. Heard -- Mr. Depp 3 claims any damages at all, that the door is, 4 therefore, opened, which really doesn't make any 5 sense. There had to be a nexus between the 6 damages claimed and the U.K. judgment. That was 7 the Court's clear ruling. 8 I'll read from the Court's ruling from 9 the transcript. "As to Motion in Limine Number 1, 10 I'm going the grant in part and grant it as to the 11 case-in-chief. If plaintiff relies on the U.K. 12 judgment then the U.K. judgment is admissible for 13 damages issues only. If plaintiff opens the door 14 to testimony regarding the U.K. judgment, then the 15 U.K. judgment will be admissible as decided during 16 the trial. If you think they've opened the door, 17 please approach the bench first before you want to 18 discuss that. The U.K. judgment cannot be 19 referred to in opening statements." 20 All it's staying is, it's fine to say 21 that if we open the door, they can go there, 22 following approaching the bench. But the order</p>	<p style="text-align: right;">259</p> <p>1 that we have to have a nexus, I agree. What they 2 wrote this theirs is that they have to open the 3 door to the U.K. judgment. They're never going to 4 the open the door to U.K. judgment, so they have 5 language in there that isn't correct. 6 THE COURT: That's what I said. 7 MS. BREDEHOFT: No, no. But then Your 8 Honor cleared it up, is my point. I'm going to 9 grant in part -- you say "If you think they have 10 opened the door, please, approach the bench first 11 before we want to discuss it." 12 THE COURT: Right. 13 MS. BREDEHOFT: And that's right. 14 THE COURT: Think that's what's in his 15 order. 16 MS. BREDEHOFT: It's not, Your Honor. 17 What they're saying is if Mr. Depp relies on the 18 U.K. judgment at trial, then the U.K. judgment is 19 admissible for damages issues only. He's not 20 going to rely on the U.K. judgment. That's the 21 sentence we took off. 22 THE COURT: What I said is if plaintiff</p>
<p style="text-align: right;">258</p> <p>1 should not say that if we have any damages at all, 2 the door is automatically open, which is 3 essentially what their order says. 4 And that's it. 5 THE COURT: All right. 6 MS. BREDEHOFT: Your Honor clarified 7 that even later, at page 188, and said "I think 8 I've ruled on this, but just make sure it's 9 clear." And what Your Honor has indicated -- 10 let's see where the place is. In any event, Your 11 Honor clarified that we do, our experts are going 12 to say that his damages are associated with the 13 U.K. judgment, among other things, they've got a 14 whole list of things. U.K. judgment is one of 15 them. We have a nexus and we understand that we 16 have to establish that. 17 THE COURT: So that's not a problem. 18 Later on, we can approach about that and we can 19 see what's going on with that. I think what I 20 ruled on is exactly what Mr. Moniz said. I mean, 21 that's what I have in my notes. 22 MS. BREDEHOFT: But, yeah, it's true</p>	<p style="text-align: right;">260</p> <p>1 opens the door to testimony regarding the U.K. 2 judgment, it will be admissible -- 3 MS. BREDEHOFT: To testimony. He's 4 got -- 5 THE COURT: Do you want to change it to 6 testimony? 7 MS. BREDEHOFT: Yes, yes. 8 MR. MONIZ: I'm not sure we need to go 9 there, Your Honor. If plaintiff opens the door, 10 she can argue at trial whether we opened the door, 11 but it shouldn't say we're claiming any sort of 12 damages. 13 THE COURT: No, she didn't say that. 14 She just -- 15 MS. BREDEHOFT: What we have is if 16 Mr. Depp relies on the U.K. judgment at trial, 17 then the U.K. judgment is admissible for damages 18 issues. He's not going to rely to the U.K. 19 judgment at trial. 20 MR. MONIZ: Your Honor, I'm fine with 21 striking that language out as long as we also 22 strike out the language "by claiming damages."</p>

261	1 MS. BREDEHOFT: I think that's fine. 2 THE COURT: All right. We'll all in 3 agreement with that. 4 MS. BREDEHOFT: Yes. 5 THE COURT: Move to the next one. 6 MS. BREDEHOFT: Next one, Your Honor. 7 THE COURT: Still on Depp's? 8 MS. BREDEHOFT: Yes, yes. 9 THE COURT: What number? 10 MS. BREDEHOFT: Number 6, page 2, 11 bottom, if we look at the redline. 12 THE COURT: Number 6. 13 MS. BREDEHOFT: I think what the 14 plaintiff has tried to do here is try to merge the 15 Russian with the bot. And Your Honor clearly kept 16 out and we said we're not claiming Russian bots, 17 and Your Honor ruled that way. But we do have 18 testimony and we told Your Honor, during the 19 Motion in Limine, we had testimony about the bots, 20 and Your Honor said we've got to link it up but 21 that's not excluded. So what we -- specifically, 22 if it has bot campaign, has specifically Russian	263	1 interpretation of the order, and I think that's on 2 the transcript. 3 THE COURT: All right. Mr. Depp. 4 MS. BREDEHOFT: It is the Russian. I 5 think we're just -- it's a matter of semantics 6 between the two of us on the language, and then we 7 added, Your Honor, what Your Honor said 8 specifically, "Or there is nexus shown so as to 9 prove damages or to prove malice with other social 10 media posts were connected to those defamatory 11 statements," and we've added that, that is in our 12 redline. That's at page 52, Your Honor, lines 7 13 through 9 of the transcript, what Your Honor said. 14 THE COURT: Do you have any objection 15 to adding that? 16 MR. MONIZ: I'm sorry, can you re-read 17 that? 18 THE COURT: It's at the top of page 3 19 that they have in their redline. 20 MR. MONIZ: Oh, yeah. That's fine. I 21 think that tracks Your Honor's order. The 22 difference of opinion is really just our position
262	1 connections. It's not all bots, just the Russian 2 bot. 3 That's the only distinction, is that 4 Your Honor ruled on the Russian, which we can see 5 there. 6 THE COURT: All right. Mr. Moniz. 7 MR. MONIZ: Yeah, here, again, Your 8 Honor, obviously we're going to be guided by Your 9 Honor's interpretation of your order because you 10 certainly know it better than we do. But I'm just 11 basing our order on the transcript. Again, if we 12 go to the transcript, what Your Honor said on the 13 record was all right -- and I'm quoting. "What 14 I'll do is I'll grant it in part as far as the 15 Russian bot. That's not going to be testified to. 16 I'm going to deny the social media," and you go on 17 to address the other parts of the motion. 18 My interpretation of that, Your Honor, 19 was that you were including the bots, the Russian 20 bots, which is the allegation, the Russian bots, 21 which is a different (indiscernible). It has no 22 nexus to the case at issue. So that's our	264	1 is that based on Your Honor's ruling, the Russian 2 bot campaign is out and they're basically saying 3 there was a bot campaign, but you can't mention 4 Russia. I think that's the confusion. 5 MS. BREDEHOFT: We agree that we're not 6 bringing up evidence of the Russian bot campaign. 7 THE COURT: The Motion in Limine said 8 we're not doing Russian bots, so I granted in part 9 to the Russian bots. 10 MS. BREDEHOFT: The key is Russian 11 bots. 12 MR. MONIZ: Well, I'm confused why she 13 says the key is Russian. Is she still arguing 14 bots? 15 MS. BREDEHOFT: Yeah. 16 MR. MONIZ: That's the point of 17 confusion, Your Honor. The allegation is Russian 18 bots. If Russian bots are out, that means we're 19 not talking about bots. 20 MS. BREDEHOFT: We have testimony about 21 bots. We don't not testimony about Russian bots. 22 THE COURT: I'm not sure what testimony

Transcript of Jury Trial - Day 1  
Conducted on April 11, 2022

67 (265 to 268)

<p style="text-align: right;">265</p> <p>1 is going to come out, what foundation is going to 2 be need for that, but if we can just put the 3 Russian bots for now, and as it says on page 3, if 4 you don't have any objection. 5 MR. MONIZ: Thank you, Your Honor. 6 THE COURT: Good. We're moving on. 7 MS. BREDEHOFT: The next one is -- 8 that's -- that takes care of the Depp one. 9 THE COURT: Depp one is done. 10 MS. BREDEHOFT: On to Heard. 11 THE COURT: Yes, ma'am. 12 MS. BREDEHOFT: And this one -- 13 THE COURT: You have redlines for this 14 as well. 15 MS. BREDEHOFT: Right, Your Honor. 16 This one, this is the situation where we have, 17 Your Honor, the issue of the arrest in 2009, the 18 customs declaration. 19 THE COURT: Which Motion in Limine? 20 MS. BREDEHOFT: This is on the second 21 one, Your Honor. 22 THE COURT: Number 2?</p>	<p style="text-align: right;">267</p> <p>1 determination was whether they were authentic 2 or -- I can't remember the language -- from 2006. 3 THE COURT: All right. 4 MS. BREDEHOFT: But Your Honor said, 5 first of all, that you had to make a determination 6 if it was reliable, and then you would make 7 rulings after that. Our position on those, Your 8 Honor, there's so prejudicial to Ms. Heard, the 9 moment they come in, they can't be taken back, 10 and, you know, obviously, we argue pretty 11 substantially on Rule 2:406, 608 on that, 608, on 12 what's impermissible and what's not, and 609, 13 which was the -- you can't introduce anything 14 that's arrest, it has to be a conviction, a 15 conviction and with moral turpitude. And the 16 exception to that, they were arguing, was the 17 perjury, Your Honor, which was -- and none of 18 these are perjury charges, but even then, that was 19 a different code section, and that the witnesses, 20 not the parties. 21 So the arrests, first of all, the 22 arrest in Seattle, she was not charged with it,</p>
<p style="text-align: right;">266</p> <p>1 MS. BREDEHOFT: Yes. If Your Honor's 2 looking at the redline of it, you'll see the 3 distinctions. We're indicating that they must -- 4 they can't -- think they've agreed to some of our 5 languages that we have, and they must, first, 6 approach the bench before raising any of the 7 following issues in the presence of the jury. We 8 understood that that's what Your Honor was saying, 9 and these are the ones that, Your Honor may 10 recall, we moved for reconsideration. Ms. Heard's 11 arrest at the Seattle Tacoma airport in King 12 County Washington in 2009, the customs declaration 13 in 2015, the letter to the United States 14 Immigration Services regarding Samantha McMillan 15 in 2014, and then the trial exhibits that are 16 associated with it. 17 And we also have that they are 18 prohibited from mentioning these in their opening 19 statement. They've taken that out. We clearly 20 understood that's what Your Honor was saying. I 21 have to make a determination on these whether 22 there's a, I think the first part of the</p>	<p style="text-align: right;">268</p> <p>1 she was charged and it was dropped, and it was in 2 2009. So we don't have a criminal conviction, a 3 felony conviction, or a crime involving crimes of 4 moral turpitude. 5 The second thing is, we have a customs 6 declaration. 7 THE COURT: I'm not rearguing this -- 8 MS. BREDEHOFT: Okay. 9 THE COURT: I've already done this and 10 I've already denied the reconsideration. We're 11 past that. What did I say on the record? 12 Whatever I said is what goes in the order. 13 MS. BREDEHOFT: Right. And what Your 14 Honor said was that you had to make a 15 determination first on -- I need some help here 16 because I was working on this and you were working 17 on that. My apologies. 18 Your Honor said, on one part of it, 19 they can't raise it, and then -- but it wasn't 20 clear on the record that you said for all of them. 21 What is -- 22 THE COURT: If I remember correctly,</p>

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

24345

<p style="text-align: right;">269</p> <p>1 some of them, they said they weren't going to 2 mention. 3 MS. BREDEHOFT: I think that's right, 4 You Honor. 5 THE COURT: So why don't I hear from 6 Mr. Moniz on that. He seems to have the 7 transcript. 8 MR. MONIZ: Well, I should have had the 9 transcript, Your Honor. 10 THE COURT: Okay. 11 MR. MONIZ: But this is a little bit of 12 a tempest in a teapot, honestly, on this one. 13 We're not planning on mentioning these things in 14 opening arguments, but the thing here about this 15 order is really that -- and this is going to be a 16 running theme throughout this conversation, that 17 there are a bunch of things in Ms. Heard's 18 proposed order that are not in the transcript. 19 The language she wants to include here, I mean, I 20 think in an abundance of caution, we probably very 21 well might approach the bench before getting into 22 some of these things. That seems appropriate, but</p>	<p style="text-align: right;">271</p> <p>1 that correct? 2 MR. CHEW: That's correct. 3 THE COURT: Then we can go from there 4 during trial. 5 MS. BREDEHOFT: What is not going to be 6 part of this? It would be those specific ones? 7 THE COURT: That's correct. 8 MR. MONIZ: I can confirm, Your Honor, 9 we're not making any -- 10 THE COURT: They're not making any of 11 those seven that were outlined in that Motion in 12 Limine, will not be addressed in opening 13 statements. 14 Okay? 15 MS. BREDEHOFT: All right. Thank you, 16 Your Honor. 17 THE COURT: All right. So we can move 18 on. 19 MS. BREDEHOFT: Number 6. 20 THE COURT: Number 6. 21 MS. BREDEHOFT: So this one is the 22 approaching the bench with respect to the</p>
<p style="text-align: right;">270</p> <p>1 the Court did not, in the record, require it, so 2 to the extent the Court did not make that an order 3 in the transcript, I certainly haven't been able 4 to find that. I don't think it's appropriate to 5 approve in the order. 6 If Ms. Bredehoft can show the language, 7 where the Court included this language in the 8 transcript, that would be a different story, but I 9 haven't been able to find that. 10 MS. BREDEHOFT: The language I was 11 trying to find, Your Honor, you said the other 12 one, I just don't know how the evidence is going 13 to play out at this time. The evidence will be 14 subject to all relevance, foundation, other 15 objections at trial, is what Your Honor said. 16 They're not going to open it if they're not going 17 to say in opening that couched tremendously, but I 18 think they still have to approach because I think 19 they're so prejudicial. 20 THE COURT: I don't know about 21 approach. That wasn't in my order. It's not 22 going to be part of opening statements, though; is</p>	<p style="text-align: right;">272</p> <p>1 photographs in the media and creating new images, 2 references to Ms. Heard's stint as an exotic 3 dancer before meeting Mr. Depp, and an implication 4 of reference to Ms. Heard having, at one time, 5 worked as an escort. They agreed with that 6 language, but the Court says, specifically, "I'll 7 grant as to the pictures of the reference to 8 escort/dancer evidence in the case-in-chief. 9 Again, if it's going to feel like you can use it 10 in rebuttal, please, approach before that is done 11 or a question is asked." That's the language we 12 have in here, and that's what they're objecting 13 to. That's page 182, Your Honor. 14 MR. MONIZ: And our problem with that, 15 Your Honor, that's fine as far as it goes, but 16 she's trying to apply that to the parts of the 17 motions that were denied. 18 THE COURT: Denied the videoed 19 relationships. 20 MR. MONIZ: And the Court, again, 21 just -- Your Honor did not order that, as to the 22 parts we're denying, so it shouldn't be in the</p>

<p style="text-align: right;">273</p> <p>1 order if it was ordered at the hearing. 2 MS. BREDEHOFT: We don't have that as 3 part of it, Your Honor. That's denied down below, 4 if you look at our redline. 5 MR. MONIZ: Unless I'm looking at a 6 different redline, I'm reading from your order, 7 Ms. Bredehoft. If Mr. Depp seeks to introduce any 8 evidence, elicit testimony or ask any questions 9 regarding such topics from those granted or denied 10 at trial, he must, first, approach the bench and 11 these topics cannot be referenced in Mr. Depp's 12 opening statement. That was not ordered as to the 13 items that were denied. Unless I'm looking at a 14 different -- no, I'm looking at the same one. 15 MS. BREDEHOFT: I have these three. 16 MR. MONIZ: But you have the language 17 "as to those granted or denied," which applies, 18 then, to the following section. 19 MS. BREDEHOFT: So, just -- 20 MR. MONIZ: Strike out "denied," and 21 we're in agreement. 22 MS. BREDEHOFT: All right. We'll take</p>	<p style="text-align: right;">275</p> <p>1 different, I would like to hear what that is so I 2 can properly address it. The point is, we're not 3 going to ambush the Court with 10 minutes of oral 4 arguments on why Mr. Neumeister should be 5 excluded. It should be handled in a 6 (indiscernible) brief that we will follow the 7 Court's direction on when that's filed and when 8 that's heard. That's Ms. Heard's only point here, 9 Your Honor. 10 THE COURT: All right. 11 MR. MONIZ: And, again, Your Honor, the 12 same basic point as before, the Court did not 13 specifically state, on the record, that Ms. Heard 14 was authorized to file a motion. Obviously, not 15 including that language in this order does not, in 16 any way, preclude Ms. Heard from doing so. 17 THE COURT: File a motion, yes. 18 MR. MONIZ: I don't think the language 19 is necessary or appropriate. I mean, our 20 suggested language, I think, more accurately 21 tracks the transcript, where Your Honor indicated 22 that any objection based on Crane ought to be</p>
<p style="text-align: right;">274</p> <p>1 out denied. 2 THE COURT: Take out denied. All 3 right. 4 Moving on. 5 MS. BREDEHOFT: Okay. Your Honor, I'm 6 going to pass this one-off to Mr. Murphy. I 7 should have at the beginning. 8 MR. MURPHY: Next one is 10G, this is 9 on Mr. Neumeister, Your Honor. So, this is bottom 10 of page 4, top of page 5. 11 THE COURT: Okay. 12 MR. MURPHY: I expect the opposition 13 argument is that this is about semantics, but it's 14 not semantics, Your Honor. Ms. Heard, we believe, 15 is tracking Your Honor's ruling. We shall have 16 the right to file a motion to exclude 17 Mr. Neumeister, which the Court shall rule on 18 before he testifies. Mr. Depp seeks language that 19 any objection -- I'm not really sure what that 20 means. If by that they mean they can file a 21 motion that the Court will rule on, why won't they 22 agree with our language? If they mean something</p>	<p style="text-align: right;">276</p> <p>1 addressed prior to the testimony. That's what's 2 in our order. I think that gets to the same point 3 without suggesting such an order has been 4 specifically authorized by the Court, which, 5 again, did not happen at the hearing. 6 MR. MURPHY: 30-second response, Your 7 Honor. On page 226, Your Honor said if it's a 8 Crane issue. I will admit Your Honor did not say 9 you can file a written brief, but I'm unaware how 10 you bring a Crane issue before the Court, live 11 with an objection in the middle of trial, it's 12 typically handled during a briefing in this court. 13 That's all we're requesting here. 14 THE COURT: All right. We'll put it in 15 the language as you can file a motion. I mean, 16 that's how it will be done. I'm not sure it's 17 needed, but if you want it in there, that's fine. 18 MR. MURPHY: Thank you, Your Honor. 19 THE COURT: All right. Next one. 20 MR. MURPHY: Yes, Your Honor, the next 21 one, this is a -- on Dr. Curry, Your Honor, 10E, 22 so right blow that. Ms. Bredehoft argued this</p>

277

1 one, Your Honor, and there's a back-and-forth  
2 where, on page 231 and 232, Your Honor was asking  
3 "What about emotional distress? Opinions about  
4 emotional distress with the Depp abuse, Heard  
5 (indiscernible) Depp. That's not something she is  
6 going to opine to, correct?" And Mr. Chew said "I  
7 don't mean to interrupt," and he said "wasn't it  
8 about the three statements?" In your quote, Your  
9 Honor said "Emotional distress is what she  
10 referenced." Then Mr. Chew said, with a question  
11 mark, "Relating to the three statements?" And  
12 Your Honor -- and then Ms. Bredehoff said the  
13 proposed order was page 5. This is Ms. Heard's  
14 initial proposed order.  
15 Our understanding of that ruling, Your  
16 Honor, is Dr. Curry cannot testify at trial  
17 whether Ms. Heard suffered any emotional distress  
18 as a result of the alleged defamatory statements,  
19 period, not at issue in her counterclaim. I don't  
20 know exactly what they mean by that. I think what  
21 they mean by that is three statements are going to  
22 trial, so all I can glean from that is they intend

278

1 to have Dr. Curry testify about emotional distress  
2 or lack of emotional distress about the  
3 counterclaims statements that are not going to  
4 trial, which we do not believe is in accordance  
5 with Your Honor's ruling. If that's not what  
6 they're saying, I would like to hear what they're  
7 saying, but that's my interpretation of it, and I  
8 don't believe that's correct.  
9 THE COURT: Yes, sir.  
10 MR. MONIZ: Your Honor, I believe the  
11 transcript, again, is clear, Your Honor. It was  
12 an agreement of counsel, I believe, on the record.  
13 It was very clear that it was limited specifically  
14 to the three counterclaim statements. That's  
15 clearly how it was reflected in the transcript.  
16 I'm not sure what the issue here is, honestly. I  
17 think it's clear Dr. Curry, the scope of  
18 Dr. Curry's testimony has already been outlined.  
19 This has already been briefed. And the transcript  
20 clearly reflects that the issue here is just the  
21 counterclaim statements. That was what was stated  
22 on the record, and I have (indiscernible).

279

1 MR. MURPHY: Your Honor,  
2 Ms. Bredehoff's argument on page 227 of the  
3 transcript is Dr. Curry did not address if the  
4 defamatory statements made by Adam Waldman caused  
5 any emotional distress to Ms. Heard. So, I do not  
6 believe Dr. Curry opined to emotional distress or  
7 lack of emotional distress for other counterclaim  
8 statements that are going to trial, so, therefore,  
9 it would be undisclosed testimony. So why should  
10 Dr. Curry be able to opine to an expert opinion  
11 that that was not previously disclosed, is  
12 essentially the point here?  
13 MR. MONIZ: The order tracks an issue,  
14 what we were talking about with the counterclaim  
15 statement. I'm not sure what the problem is,  
16 honestly.  
17 THE COURT: All right. So let's just  
18 strike out "at issue on the counterclaim." We'll  
19 cross that bridge when we come to it, if we come  
20 to it, for some other reason, okay?  
21 MR. MURPHY: Thank you, Your Honor.  
22 THE COURT: All right. Next one.

280

1 Number 12.  
2 MR. MURPHY: Number 12, this one should  
3 be pretty straightforward, Your Honor. We added  
4 "otherwise denied at this time," and that  
5 Dr. Curry may testify regarding limitations of her  
6 evaluation subject to relevance, foundation, and  
7 other objections at trial.  
8 That, to me, I don't know what the  
9 issue is with that. It's denied at this time, and  
10 subject to trial objections. So I don't  
11 understand what the issue is on that one. If it's  
12 not explicitly stated, Your Honor stated, after  
13 probably 95 percent of the limine rulings that  
14 were denied subject to relevance objections and  
15 other objections at trial, so I don't see the harm  
16 in adding that in here just to prevent a claim  
17 that, oh, this is in, period, regardless of what  
18 happens at trial.  
19 MR. MONIZ: I think I can save us some  
20 time here, Your Honor.  
21 THE COURT: I'd appreciate that.  
22 MR. MONIZ: We've been exchanging

<p style="text-align: right;">281</p> <p>1 redlines. This is a change that probably should 2 have been accepted. I don't think that's a 3 problem. 4 THE COURT: All right. That's fine. 5 MR. MURPHY: Moving right along, Your 6 Honor. 7 THE COURT: 15. 8 MR. MURPHY: It looks like a lot of 9 red, but it's actually one argument that can be 10 argued in 30 seconds, Your Honor. 11 THE COURT: Don't promise me things 12 like that. 13 MR. MURPHY: I'm timing myself, Your 14 Honor. 15 That this is the list Ms. Heard 16 included and Your Honor just said, I don't know 17 what's going to come in at trial, we'll have to 18 see what happens. This is about discovery orders, 19 pleadings, references to Court rulings, references 20 to responsive pleadings. All these things that we 21 don't believe are evidence. We understand Your 22 Honor denied the motion at the time, but the point</p>	<p style="text-align: right;">283</p> <p>1 There's nothing inherently prejudicial about 2 offering a pleading into evidence that requires 3 that we approach the bench. It's perfectly 4 reasonable to simply make the objection on the 5 record and go from there. That's obviously 6 subject to the Court's preference. If you feel it 7 necessary for us to approach the bench, we 8 obviously will, but that wasn't in the order. 9 As to grandstanding, we generally do 10 our best not to grandstand. If Your Honor wants 11 to rule that in the order, we certainly can, but 12 if it wasn't addressed in the Motion in Limine, we 13 didn't think it was necessary. 14 THE COURT: I have it in my notes, I 15 may not have said it at that time, but approaching 16 the bench, let's just put it in there. That's 17 fine. 18 MR. MURPHY: Just so the record is 19 clear, when you say keep that in there, the 20 redline from Ms. Heard is -- I just want to make 21 sure I understand. 22 THE COURT: You didn't have any</p>
<p style="text-align: right;">282</p> <p>1 of the list being in there, Your Honor, is the 2 predicate language that Mr. Depp or Ms. Heard need 3 to seek permission from the Court outside the 4 presence of the jury before raising these matters 5 at trial, and nor is counsel to engage in any 6 grandstanding. That was a quote from Your Honor 7 in the ruling. 8 THE COURT: I think that approached the 9 bench. 10 MR. MURPHY: And if Your Honor wanted 11 to add approach the bench, we'd have no issue with 12 that. 13 The point is, these matters cannot be 14 stated in front of the jury without Your Honor 15 having made a threshold determination of whatever 16 the specific issue is, at whatever point in trial 17 this comes up. 18 MR. MONIZ: And, again, Your Honor, 19 it's a comparatively small point, and if the Court 20 prefers that we approach the bench, we obviously 21 can. I don't believe that's actually reflected in 22 the order. I also don't believe it's necessary.</p>	<p style="text-align: right;">284</p> <p>1 objection to the listing of the particular -- 2 MR. MONIZ: Again, Your Honor, I don't 3 think it's necessarily necessary for us to 4 approach the bench before offering it into 5 evidence. The complaint or the answer or to the 6 extent, I mean, it's not inherently prejudicial. 7 There's no bell that can't be unrung if the jury 8 hears the word (indiscernible) in a complaint or 9 the evidence, they're free to object. I don't 10 understand why it's necessary. If it's 11 particularly important to them and Your Honor 12 agrees with them, then I suppose that's fine, but 13 I really don't think it's necessary. 14 MR. MURPHY: Ten seconds, Your Honor. 15 I would say they are inherently prejudicial -- 16 THE COURT: When you say approach the 17 bench, I think his question was, do you mind 18 listing under each one of them? 19 MR. MONIZ: If Your Honor feels that 20 it's necessary for us to approach the bench 21 before -- well, I mean, I do have some problems 22 with the language, Your Honor.</p>

<p style="text-align: right;">285</p> <p>1 THE COURT: Okay. 2 MR. MONIZ: Number 3, for example, 3 references to including prohibiting counsel's 4 statement and questions, such as for the first 5 time disclosed blank at a deposition or for the 6 first time disclosed blank at a certain written 7 discovery response. I don't know that it's 8 necessarily appropriate for us to have to break up 9 the stream of questioning to approach Your Honor 10 to ask a question that, really, simply relates to 11 when a particular allegation was disclosed. 12 As Your Honor knows, it's one of the 13 major points that we made. Ms. Heard's story 14 evolved over time, the new allegations pop up here 15 and there at particularly convenient moments. 16 That's going to be a point that's made through the 17 course of the trial. It seems odd and cumbersome, 18 and unreasonably so, for us to have to approach 19 the bench to ask that question. All sorts of 20 questions are going to be posed that are going to 21 be very irritating to witnesses on both sides. 22 THE COURT: Other than Number 3, any</p>	<p style="text-align: right;">287</p> <p>1 MR. MURPHY: I don't know what they're 2 going to ask. That's the point, Your Honor. But 3 it's preventing them from saying something like 4 that, about you just disclosed this in this 5 interrogatory. Well, the interrogatory might not 6 have been due until the day it's disclosed. 7 THE COURT: Well, that's why we have 8 cross-examination and redirect. 9 So, let's take 3 out, and then we will 10 be good. 11 Okay? 12 MS. BREDEHOFT: The next one, Your 13 Honor, I'll deal with. This is number 20, page 8. 14 THE COURT: Okay. 15 MS. BREDEHOFT: This is the Warner 16 Brothers. This is the lawyer's letter saying, 17 here's what one of our clients would say in a 18 declaration. That's the letter, and then there's 19 the proposed stipulation that was rejected by the 20 other side. I recognize Your Honor has denied it 21 subject to, but we have the other concern that I 22 raised this morning with Your Honor, that the</p>
<p style="text-align: right;">286</p> <p>1 issues with the other ones? 2 MR. MONIZ: I apologize, Your Honor. 3 If I could just have ten seconds. 4 THE COURT: Sure. 5 MR. MONIZ: I think most of the rest of 6 it is fine, Your Honor. 7 MR. MURPHY: (Indiscernible) number 3, 8 Your Honor. So here's the issue, Your Honor: 9 He's talking about emails, text messages, when 10 Ms. Heard told this person or that person or 11 didn't tell this person or that person. That's 12 different. That has nothing to do with this. 13 This is either parties' discovery production or 14 discovery responses. That's pulling out a 15 discovery response, why did you first do it in 16 this one? Well, the answer is, it probably wasn't 17 due until then, or something like that. That has 18 nothing to do with the jury. That's just a matter 19 of litigation deadlines. 20 THE COURT: You're not asking questions 21 of the witnesses in this particular one. It's 22 just --</p>	<p style="text-align: right;">288</p> <p>1 confidential designation of Walter Hamada, who was 2 the corporate designee from Warner Brothers, was 3 released to the press. Warner Brothers alerted 4 both sides on Friday night and is very, very 5 concerned about this. What I put in, Your Honor 6 didn't say, although I think Your Honor meant it, 7 was it can't be referenced in opening statements, 8 and they must approach the bench. Clearly, it's a 9 lawyer's letter saying, here's what a declaration 10 would say. So, it's hearsay, hearsay. Then 11 there's a stipulation that's clearly, all right, 12 here's our way to resolve the discovery dispute. 13 And I understand Your Honor's ruling 14 and I respect it, regarding the motion to 15 reconsider, Your Honor denied it, but all I'm 16 asking, because it was so, so incredibly 17 prejudicial, that it not be referenced in opening 18 and that they have to approach the bench. 19 MR. MONIZ: So, again, Your Honor, I 20 don't think this needs to detain the Court for all 21 that long. I'm not going to address the Walter 22 Hamada issue except to say I think this is already</p>

<p style="text-align: right;">289</p> <p>1 covered by other orders. I mean, the parties have 2 already been instructed by Your Honor, I think, 3 that we're not to make specific references or 4 citations to exhibits. I don't think this is 5 actually our exhibit list. Well, maybe. 6 But in any case, we don't have it in 7 our opening statement. But, again, Your Honor did 8 not direct that at the hearing, so it shouldn't be 9 included in the order, but moot point. It's not 10 in -- 11 THE COURT: It's not in the opening 12 statement. So, move on. 13 MS. BREDEHOFT: But can we also -- that 14 they must approach the bench before they try to 15 raise it? It's so prejudicial. 16 THE COURT: The Motion in Limine 20, 17 only thing I have here, what I think I said on the 18 record was denied, does not fall under the 19 Rule 2:408. 20 MS. BREDEHOFT: Correct, Your Honor. 21 THE COURT: So, let's move on. 22 MS. BREDEHOFT: All right. The last</p>	<p style="text-align: right;">291</p> <p>1 he's paying any of her fees. I mean, that was 2 Your Honor's ruling. There was nothing in there 3 about approaching the bench. 4 MS. BREDEHOFT: I don't disagree that 5 the door's open, but I think we have to agree 6 whether the door was opened before. I think Your 7 Honor has to make that threshold determination. 8 MR. MONIZ: Well, Your Honor, if he's 9 called as a witness, the door's open. I mean, 10 that's Your Honor's ruling. 11 MS. BREDEHOFT: That's not -- if 12 Mr. Musk is called as a witness, that opens the 13 door to ask if he pays -- 14 THE COURT: This is what I have in my 15 notes: Granted although -- the motion was 16 granted, although can be asked of Mr. Musk only 17 for bias. Limited instruction will be given. 18 MS. BREDEHOFT: Okay. 19 THE COURT: So, I'm not sure where all 20 the other language came from. 21 MS. BREDEHOFT: The other issue -- good 22 thing I have Mr. Murphy.</p>
<p style="text-align: right;">290</p> <p>1 one is, I think, more of a matter of semantics. 2 It's the payment of attorneys' fees, and it's 3 page 9. 4 THE COURT: What number is it? 5 MS. BREDEHOFT: Number 26. 6 THE COURT: 26. 7 MS. BREDEHOFT: Both of us agreed, if 8 the door's open, that they can question on it. 9 The difference is just in the language that we've 10 got here. If Ms. Heard opens the door at trial as 11 to who is paying the attorneys' fees, Mr. Depp 12 must, first, approach the bench, outside the 13 presence of the jury, to ask Ms. Heard or 14 Mr. Musk, in rebuttal, who's paying attorneys' 15 fees, if any. 16 MR. MONIZ: Again, Your Honor, I think 17 the only point here, again, is that Your Honor did 18 not require that at the hearing. The ruling was 19 pretty clear. We're entitled to ask Ms. Heard 20 that question if she opens the door, and to the 21 extent Mr. Musk is put on as a witness, we're 22 entitled to ask Ms. Heard and Mr. Musk whether</p>	<p style="text-align: right;">292</p> <p>1 The second issue is the first part, it 2 says who is paying her attorneys' fees. They have 3 hedged to the issue of her attorneys' fees, as 4 opposed to who is paying the attorneys' fees, and 5 the issue is, who is paying the attorneys' fees? 6 THE COURT: Can we put a "who" in 7 there? 8 MR. MONIZ: That's fine, Your Honor. I 9 thought it was understood. 10 THE COURT: Is that it? 11 MS. BREDEHOFT: That's it. 12 THE COURT: Done with Motion in 13 Limines? 14 Mr. Chew, you look like you really want 15 to get up. 16 MR. CHEW: I do, Your Honor. I've been 17 quiet most of the day. 18 THE COURT: I appreciate that. 19 MR. CHEW: Thank you. I'll be quick. 20 We have two issues relating to some tape 21 recordings --- 22 THE COURT: Okay.</p>

<p style="text-align: right;">293</p> <p>1 MR. CHEW: -- that Mr. Depp and 2 Ms. Heard made of each other during arguments, et 3 cetera. 4 THE COURT: Okay. 5 MR. CHEW: So we have two issues on 6 which we seek the Court's guidance. 7 THE COURT: Okay. 8 MR. CHEW: Number one, Your Honor may 9 recall Ms. Bredehoff raised that in front of the 10 jury today. We think that was inappropriate, and 11 we seek the Court's guidance as to those 12 recordings being referenced in opening argument. 13 We think they shouldn't be. They haven't been 14 admitted, so we don't think either party should be 15 allowed to reference, so that's issue one. 16 Issue two is because, by definition, 17 the recordings contain both parties, under the 18 evidentiary rules, neither can introduce the 19 entire tape because it's hearsay as to the other 20 party. Both parties probably will want to use 21 that. So, we seek the Court's guidance as to how 22 we should handle that. It might require a</p>	<p style="text-align: right;">295</p> <p>1 other side, the tape recordings. So I brought 2 those up after we went through and had our 3 whole -- as Your Honor can see, we both worked, I 4 believe, from Exhibit C of their objections, and 5 on page 10, at the bottom of it, and into page 11, 6 there's no objections to those and those are 7 the -- 8 <b>A I don't want to go backwards, but I</b> 9 <b>didn't have it on my list either, but that's fine.</b> 10 <b>What about now?</b> 11 MS. BREDEHOFT: So -- 12 THE COURT: Are you going to reference 13 the videotapes, I guess, in opening statements? 14 MS. BREDEHOFT: The videotapes? 15 THE COURT: That's what I have. Videos 16 of the recordings is what I have. 17 MR. CHEW: And audio tapes. Some of 18 them are audio tapes. 19 THE COURT: Audio tapes, video tapes. 20 MS. BREDEHOFT: I'm not finding them 21 quoting anything because Your Honor has ruled we 22 can't. We can refer to the things, and we may</p>
<p style="text-align: right;">294</p> <p>1 (indiscernible) between the parties, rather than 2 having awkward spliced tapes -- 3 THE COURT: Right. 4 MR. CHEW: -- of our side only 5 producing a tape that has Ms. Heard so we can get 6 it admitted, and Ms. Heard only being able to 7 produce a tape of Mr. Depp because it would be 8 hearsay as to her. 9 So if we could seek the Court's 10 guidance, one, barring either side from 11 referencing the tapes during opening argument, 12 because they have not been admitted, and, two, 13 directing -- giving us some guidance, perhaps we 14 can meet and confer so we can agree, that the 15 entirety of the tapes be admitted rather than to 16 do it in an awkward fashion. 17 THE COURT: All right. Ms. Bredehoff. 18 MS. BREDEHOFT: So, the first question 19 Your Honor had, the claim that Mr. Chew and I had 20 asked these questions. I have the markup here. I 21 know we had an issue here, but my question on the 22 tape recordings were not even objected to by the</p>	<p style="text-align: right;">296</p> <p>1 well refer to audio recordings. I'm happy to do a 2 meet and confer on this one because I agree, I 3 think we have some awkwardness here. We have 4 hearsay exceptions with potentially prior 5 inconsistent statements, things like that are 6 party-opponent admissions. I'm happy to consult 7 with them because I agree with you. There's one 8 audio recording that's five hours long. There's 9 no way we're going to play that, and there are 10 some others that there may be parts that either 11 side. So, I'm happy to confer with them on that, 12 but I don't think that impacts, at all, our 13 openings on -- I'm not sure what's being asked 14 here on openings. 15 MR. CHEW: I can clarify that, Your 16 Honor. 17 THE COURT: Okay. That's fine. 18 MR. CHEW: The audio tapes and the 19 videotapes should not be referenced during the 20 openings. They haven't been admitted, and they 21 may not be. So they're just like any other 22 exhibit that has not been admitted. Because, by</p>

<p style="text-align: right;">297</p> <p>1 definition, half of those tapes are going to be 2 hearsay. So they shouldn't be referenced at all. 3 They're not an exception, there's no exception to 4 the hearsay rule that's applicable. I think it's 5 very important that they not be referenced. They 6 shouldn't have been referenced in voir dire, but 7 as Your Honor says, we're not going to go 8 backwards, but we are concerned about what's 9 happening tomorrow. And if there are any 10 references to the audio tapes and videotapes, that 11 should be excluded. 12 MS. BREDEHOFT: Your Honor, that's not 13 a correct statement of anything. That means that 14 we couldn't reference anything for our opening, 15 we'd have to just sit down. We can't say what the 16 testimony is going to be, we can't say what the 17 evidence is going to be? Of course we can say 18 what the testimony and the evidence is, then if it 19 doesn't come in, then they can call us a liar in 20 the closing. But we're able to make reference to 21 the videotape, we're able to make reference to the 22 audio tapes. As I said, we're not going to</p>	<p style="text-align: right;">299</p> <p>1 MR. CHEW: Yes, Your Honor. 2 THE COURT: Okay. 3 MR. CHEW: Just in light of the past 4 prolog, if Your Honor could order us to meet and 5 confer on that -- 6 THE COURT: You said you don't have any 7 objection to meet and confer, so you can figure 8 out how that can come in more coherently? 9 MS. BREDEHOFT: Yes. I think that's -- 10 I understand. 11 THE COURT: Do you intend to have these 12 in your case-in-chief in the next week and a half? 13 MR. CHEW: Perhaps, Your Honor. 14 THE COURT: So you need to meet and 15 greet relatively soon. 16 MS. BREDEHOFT: Meet and greet. 17 THE COURT: I'll hold you to that. 18 MS. BREDEHOFT: Okay. 19 THE COURT: Other than that, a few 20 things I wanted to go through. 21 Do you have anything else, 22 Ms. Bredehoff?</p>
<p style="text-align: right;">298</p> <p>1 specifically quote anything. Your Honor's ruled 2 on that, and we will adhere to that. 3 THE COURT: Okay. 4 MR. CHEW: Your Honor, I don't see how 5 an audio tape or a videotape is any different from 6 any other exhibit. 7 THE COURT: Well, I think, in her case, 8 she's going to say the evidence is going to show 9 that you're going to hear allegations through 10 audio tapes and videotapes. If she doesn't 11 deliver, that's something you can bring up in 12 closing, for sure, but I think she can say this is 13 what she expects the evidence can be. So, I'll 14 allow that. 15 MR. CHEW: But she cannot quote from 16 it. 17 THE COURT: I think she agrees she's 18 not going to quote from it. 19 MS. BREDEHOFT: Correct. 20 MR. CHEW: Thank you, Your Honor. 21 THE COURT: Okay. That's the 22 videotape. Anything else on that?</p>	<p style="text-align: right;">300</p> <p>1 MS. BREDEHOFT: No. 2 THE COURT: Just want to make sure. 3 Now, did the witness list get 4 exchanged? 5 MS. VASQUEZ: Yes, Your Honor. 6 THE COURT: What I would like to know, 7 is there any remote witnesses tomorrow, because we 8 have to make sure we send you a Webex for it, if 9 necessary? 10 MS. VASQUEZ: No, Your Honor. 11 THE COURT: So, no Webex for tomorrow? 12 MS. VASQUEZ: No. And if Your Honor 13 would please the Court, we're happy to share 14 whenever we have a remote witness. 15 THE COURT: If you could just let us 16 know when you have a remote witness, that would 17 help, just so we can get that all taken care of 18 with the IT folks. 19 MS. BREDEHOFT: And they will be 20 disclosed for the next day too, and I was trying 21 to confer with Mr. Chew. I don't think they're 22 remote either.</p>

Transcript of Jury Trial - Day 1  
Conducted on April 11, 2022

76 (301 to 304)

301	1 MR. CHEW: They're not. 2 THE COURT: Perfect. Friday will be 3 upon us, and I want to make sure that you're doing 4 your homework, sitting down and working on 5 depositions with each other. 6 MR. CHEW: Ms. Meyers was working on it 7 earlier today. 8 THE COURT: Working on it real hard, 9 right? 10 MS. BREDEHOFT: Yes. We have one down 11 to literally, like, four things for the Court. 12 THE COURT: That's music to my ears. 13 Great. I just want to make sure that we're 14 progressing on that, so when Friday comes, we can 15 get through a lot of depositions. 16 I do have a docket Friday at 9 a.m., I 17 moved it to 9 a.m., so it should be done close to 18 10. So, we can have the whole day, 10 to 5, to do 19 what you need to do on that day, so, let's take 20 advantage of that. 21 Other than that, I think -- just a 22 reminder, there will be no statements to press or	303	1 have anything else? 2 MS. BREDEHOFT: No, Your Honor. 3 THE COURT: All right. So 10:00 4 tomorrow. Do you need any of the electronics for 5 tomorrow? 6 For your opening statements, two hours 7 each, right, two hours and two hours? 8 MS. BREDEHOFT: We've exchanged 9 demonstrative exhibits, Your Honor, and I think 10 what we're going to do is bring ours up 11 electronically on the screen. 12 Are you planning on doing that too? 13 MS. VASQUEZ: Correct. 14 THE COURT: If you want to come a 15 little early so we make sure all -- the 16 electronics get a little fidgety, so we want to 17 make sure they're all working right, okay? 18 THE BAILIFF: All rise. 19 (Whereupon, the trial was recessed 20 until 10:00 a.m. Tuesday, April 12, 2022.) 21 22
302	1 posts on websites or social media. Everybody 2 understands that, right, we're all good with that? 3 MR. CHEW: We understand that. 4 THE COURT: Everybody's got it. 5 Also, I know we have the security in 6 the back, that was part of the security plan. If 7 you don't want to use the security and you want to 8 come through the front, you're on your own. We're 9 not going to have any extra security for that. I 10 don't have any problems if you want to walk right 11 up and come up right to 5J through there. Just to 12 let you know, this is a courthouse, right, and 13 there's 37 other courtrooms and there's cases 14 going on, child custody cases and criminal cases. 15 And, so, just a reminder, that there's no posing 16 for pictures, or signing autographs in the 17 courthouse or on the courthouse grounds. Just 18 have to be very respectful of the courthouse and 19 the courthouse grounds. I just want to make sure 20 we get that settled, okay? Everybody agrees with 21 that? All right. 22 I think that's all I had. Anybody else	304	1 CERTIFICATE OF SHORTHAND REPORTER 2 I, JUDITH E. BELLINGER, RPR, CRR, the 3 court reporter before whom the foregoing hearing 4 was taken, do hereby certify that the foregoing 5 excerpt transcript is a true and correct record of 6 the proceedings; that said proceedings were taken 7 by me stenographically and thereafter reduced to 8 typewriting under my direction; and that I am 9 neither counsel for, related to, nor employed by 10 any of the parties to this case and have no 11 interest, financial or otherwise, in its outcome. 12 IN WITNESS WHEREOF, I have hereunto set 13 my hand and affixed my notarial seal this 12th day 14 of April, 2022. 15 My Commission Expires: September 30, 2024 16 17 18 <i>Judith E. Bellinger</i> 19 _____ 20 NOTARY PUBLIC IN AND FOR 21 THE COMMONWEALTH OF VIRGINIA 22

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

24354