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FAIRFAX, VA

Transcript of Jury Trial - Day 6

Date: April 19, 2022
Case: Depp, II -v- Heard

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WORLDWIDE COURT REPORTING & LITIGATION TECHNOLOGY

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Transcript of Jury Trial - Day 6
Conducted on April 19, 2022

1 (1479 to 1482)

1479	1481
<p>1 VIRGINIA: 2 IN THE CIRCUIT COURT OF FAIRFAX COUNTY 3 -----x 4 JOHN C. DEPP, II, : 5 Plaintiff and : 6 Counterclaim Defendant, : 7 v. : Civil Action No.: 8 AMBER LAURA HEARD, : CL-2019-0002911 9 Defendant and : 10 Counterclaim Plaintiff. : 11 -----x 12 HEARING 13 BEFORE THE HONORABLE PENNEY AZCARATE 14 Fairfax, Virginia 15 Tuesday, April 19, 2022 16 10:00 a.m. EDT 17 18 19 20 Job No.: 443886 21 Pages: 1479 - 1692 22 Reported by: Judith E. Bellinger, RPR, CRR</p>	<p>1 A P P E A R A N C E S 2 3 ON BEHALF OF THE PLAINTIFF AND COUNTERCLAIM 4 DEFENDANT: 5 BENJAMIN G. CHEW, ESQUIRE 6 BROWN RUDNICK LLP 7 601 Thirteenth Street NW 8 Suite 600 9 Washington, D.C. 20005 10 202.536.1700 11 12 SAMUEL A. MONIZ, ESQUIRE 13 CAMILLE M. VASQUEZ, ESQUIRE 14 BROWN RUONICK LLP 15 2211 Michelson Drive 16 7th Floor 17 Irvine, CA 92712 18 949.440.0234 19 20 21 22</p>
1480	1482
<p>1 Held at: 2 3 4 CIRCUIT COURT OF FAIRFAX COUNTY 5 4110 Chain Bridge Road 6 Courtroom 5J 7 Fairfax, Virginia 22030 8 703.691.7320 9 10 11 12 13 14 15 16 17 18 19 20 21 22</p>	<p>1 A P P E A R A N C E S C O N T I N U E D 2 3 JESSICA N. MEYERS, ESQUIRE 4 BROWN RUDNICK LLP 5 7 Times Square 6 New York, NY 7 212.209.4938 8 9 REBECCA MACDOWELL LECAROZ, ESQUIRE 10 BROWN RUDNICK LLP 11 One Financial Center 12 Boston, MA 02111 13 617.856.8149 14 15 16 17 18 19 20 21 22</p>

Transcript of Jury Trial - Day 6
 Conducted on April 19, 2022

2 (1483 to 1486)

<p style="text-align: center;">1483</p> <p>1 APPEARANCES CONTINUED</p> <p>2</p> <p>3 ON BEHALF OF THE DEFENDANT AND COUNTERCLAIM</p> <p>4 PLAINTIFF:</p> <p>5</p> <p>6 ELAINE CHARLSON BREDEHOFT, ESQUIRE</p> <p>7 ADAM S. NADELHAFT, ESQUIRE</p> <p>8 DAVID E. MURPHY, ESQUIRE</p> <p>9 CHARLSON BREDEHOFT COHEN BROWN &</p> <p>10 NADELHAFT, P.C.</p> <p>11 11260 Roger Bacon Drive</p> <p>12 Suite 201</p> <p>13 Reston, VA 20190</p> <p>14 703.318.6800</p> <p>15</p> <p>16 J. BENJAMIN ROTTENBORN, ESQUIRE</p> <p>17 WOODS ROGERS PLC</p> <p>18 10 South Jefferson Street</p> <p>19 Suite 1400</p> <p>20 P.O. Box 14125</p> <p>21 Roanoke, VA 24011</p> <p>22 540.983.7540</p>	<p style="text-align: center;">1485</p> <p>1 PROCEEDINGS</p> <p>2</p> <p>3 THE BAILIFF: All rise.</p> <p>4 THE COURT: Okay. Good morning.</p> <p>5 MR. CHEW: Good morning, Your Honor.</p> <p>6 THE COURT: All right. Do we have any</p> <p>7 preliminary matters before the jury comes out?</p> <p>8 MS. BREDEHOFT: No, Your Honor.</p> <p>9 MR. CHEW: No, Your Honor.</p> <p>10 THE COURT: Okay. That's a good day.</p> <p>11 All right. If we could have the witness,</p> <p>12 Mr. Bett, come back to the stand.</p> <p>13 Is he here or is he outside?</p> <p>14 MS. VASQUEZ: I'll go grab him.</p> <p>15 THE COURT: Okay. Just so he can be</p> <p>16 ready to go.</p> <p>17 All right. Sir, if you could, come</p> <p>18 back to the stand, please. Thank you.</p> <p>19 All right. And I think we're ready for</p> <p>20 the jury. Thank you.</p> <p>21 (Whereupon, the jury entered the</p> <p>22 courtroom and the following proceedings took</p>
<p style="text-align: center;">1484</p> <p>1 CONTENTS</p> <p>2 EXAMINATION OF JOSHUA SEAN BETT (CONTINUING) PAGE</p> <p>3 By Mr. Rottenborn 1486</p> <p>4 By Ms. Vasquez 1520</p> <p>5</p> <p>6 EXAMINATION OF KEENAN WYATT PAGE</p> <p>7 By Mr. Chew 1525</p> <p>8 By Ms. Bredehoft 1554</p> <p>9 By Mr. Chew 1590</p> <p>10</p> <p>11 EXAMINATION OF JOHN C. DEPP, II PAGE</p> <p>12 By Ms. Meyers 1601</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>	<p style="text-align: center;">1486</p> <p>1 place.)</p> <p>2 THE COURT: All right. You can have a</p> <p>3 seat, Mr. Bett.</p> <p>4 Good morning, ladies and gentlemen.</p> <p>5 All right. Just a reminder, Mr. Bett, that you're</p> <p>6 still under oath, okay?</p> <p>7 THE WITNESS: Correct.</p> <p>8 THE COURT: All right.</p> <p>9 Cross-examination.</p> <p>10 MR. ROTTENBORN: Thank you, Your Honor.</p> <p>11 EXAMINATION BY COUNSEL FOR THE DEFENDANT AND</p> <p>12 COUNTERCLAIM PLAINTIFF</p> <p>13 BY MR. ROTTENBORN:</p> <p>14 Q Good morning, Mr. Bett.</p> <p>15 A Good morning.</p> <p>16 Q You're a full-time employee of</p> <p>17 Mr. Depp, correct?</p> <p>18 A That's correct.</p> <p>19 Q You've been working with Mr. Depp for</p> <p>20 about 15 years?</p> <p>21 A Give or take, correct.</p> <p>22 Q And you make a salary from Mr. Depp,</p>

1487	1 right? 2 A I do. 3 Q And in your role, one of your top 4 priorities is to make sure Mr. Depp is safe and 5 that if he's out, he gets home safely, correct? 6 A That's correct. 7 Q And Mr. Depp's safety is a priority 8 over others that may be out with Mr. Depp, 9 correct? 10 A His safety along with the safety of the 11 people that are around him. 12 Q But Mr. Depp's safety is the top 13 priority, correct? 14 A Correct. 15 Q That just goes without saying, right, 16 in your role as his chief of security, right? 17 A Or as I said, it's his safety but those 18 that are around him as well. But he is a 19 priority. 20 Q And your job as security is to remain 21 discreetly in the background, right? 22 A Correct.	1489	1 A We did a trip to Austin, Texas. 2 Q But other than that, you didn't travel 3 outside of LA as part of your security when he was 4 with Ms. Heard, correct? 5 A Correct. 6 Q So you weren't in Australia in March of 7 2015, right? 8 A Correct. 9 Q You weren't on a plane flight from 10 Boston to Los Angeles in May of 2014, correct? 11 A Correct. 12 Q You didn't go to the Bahamas with him, 13 correct? 14 A Correct. 15 Q You didn't go to Tokyo with him and 16 Ms. Heard, correct? 17 A Correct. 18 Q You're around him almost every day when 19 he's in Los Angeles, right? 20 A Almost. 21 Q Picking up food for him? 22 A Yes.
1488	1 Q You are not part of Mr. Depp's family, 2 right? 3 A Correct. 4 Q You're not with him 24/7, right? 5 A Correct. 6 Q And you weren't with him 24/7 when he 7 was in a relationship with Ms. Heard, correct? 8 A Correct. 9 Q And you obviously have no personal 10 knowledge of what happens when you're not around, 11 correct? 12 A That's correct. 13 Q And you have no personal knowledge of 14 what happens behind closed doors with Mr. Depp, 15 correct? 16 A Correct. 17 Q When Mr. Depp was in a relationship 18 with Ms. Heard, you weren't traveling out of 19 Los Angeles as part of Mr. Depp's security, 20 correct? 21 A I did on one occasion. 22 Q What occasion was that?	1490	1 Q Pick up medicine for him? 2 A Yes. 3 Q Help coordinate visitors to his house? 4 A Correct. 5 Q Or his houses. 6 Pick up groceries for him? 7 A Yes. 8 Q And you let him into places like his 9 residences, right? 10 A Correct. 11 Q Because he doesn't carry keys for them, 12 right? 13 A Correct. 14 Q You drive him places -- 15 A I do. 16 Q -- correct? 17 Almost every time he leaves his 18 property, he's being driven rather than driving, 19 correct? 20 A Almost every time. 21 Q And you help arrange that, right? 22 A Yes.

<p>1491</p> <p>1 Q Your responsibility, one of them is to 2 help get him where he needs to go, right? 3 A Yes. 4 Q You've woken him up in the mornings 5 before? 6 A I have. 7 Q And yesterday I believe you testified 8 that sometimes Mr. Depp would have just a glass of 9 wine or two, right? 10 A Yes. 11 Q And you testified that his demeanor 12 when he was slightly intoxicated was the same as 13 if he had had a glass of sparkling water. 14 Do you remember giving that testimony? 15 A I do. 16 Q The fact is you've seen him much more 17 impaired than that, right? 18 A I have. 19 Q You've seen him impaired enough that 20 you've had to help put him to bed before, right? 21 A I don't understand by "putting him to 22 bed."</p>	<p>1493</p> <p>1 next day, right? 2 A I wouldn't stay with him. I just would 3 say, "Good night. I'm going home, and I'll see 4 you tomorrow," or if I happen to have a few days 5 off, "I'll see you in a few days." 6 Q Yesterday -- you've actually prevented 7 people from calling the police when Mr. Depp's 8 behavior after drinking was bothering them, 9 haven't you? 10 A Prevented people? 11 Q Uh-huh. 12 A Well, there's one time, correct. 13 Q Yeah. And in that occasion, Mr. Depp 14 and some other people had had a couple perfect 15 bottles of wine and pounded an entire bottle of 16 tequila, right? 17 A I don't remember how much they had to 18 drink, no. I know there was drinking going on. 19 Q Mr. Depp told you that they had had a 20 couple bottles of perfect wine and pounded an 21 entire bottle of tequila, right? 22 A I don't remember. That was some time</p>
<p>1492</p> <p>1 Q Well, there have been times when 2 Mr. Depp was so impaired that you had to get up 3 the stairs and open the bedroom doors for him, 4 right? 5 A Well, that specific bedroom door in his 6 Los Angeles house, it has a tricky lock to it, so 7 it's, you know, there have been times where I've 8 gone upstairs and maybe had a glass of water for 9 him, and so I would have to open that door for 10 him, correct. 11 Q Right. So you've gotten him into 12 bed -- you've gotten him some water, you've asked 13 him if he needs anything, right? 14 A Correct. 15 Q At times when he's been impaired, 16 correct? 17 A At times when he's just had breakfast 18 and some coffee. 19 Q And you've stayed with him -- during 20 times when he's been impaired, there's times when 21 you've stayed with him until he lays down and you 22 tell him, "Good night," and you'll see him the</p>	<p>1494</p> <p>1 ago. 2 MR. ROTTENBORN: Heather, can you pull 3 up Exhibit 892, please. 4 Q Mr. Bett, is this a text exchange that 5 you had with Mr. Depp on September 1st, 2017, 2:34 6 to 2:36 in the afternoon? 7 A If you just give me a moment, let me 8 put my glasses on. 9 Q Sure. Take your time. 10 A I have a hard time. Thank you. Okay. 11 Much better. 12 Can you repeat that statement or 13 question? 14 Q Sure, sure. My question was just is 15 this a text exchange that you and Mr. Depp had on 16 September 1st, 2017, from 2:34 to 2:36 in the 17 afternoon? 18 MS. VASQUEZ: Objection, Your Honor. 19 Relevance. The date, this is well after... 20 THE COURT: What's the relevance of 21 2017? 22 MR. ROTTENBORN: The relevance is that</p>

1495	1 Mr. Bett testified yesterday that he'd seen 2 Mr. Depp have a glass or two of wine, and this is 3 direct evidence to contradict that. 4 THE COURT: All right. I'll allow it. 5 All right. 6 MR. ROTTENBORN: Thank you, Your Honor. 7 THE COURT: Since there was no time 8 frame on that. Okay. 9 A Oh, I'm sorry. Yeah. According to the 10 time stamp and date, that is a text message from 11 Mr. Depp and I. 12 Q And at 2:34 p.m., Mr. Depp texts you, 13 "Steaks were excellent and pondering, though we 14 will likely have dinner here. Steaks were 15 excellent. A couple of bottles of perfect wine. 16 We then pounded an entire bottle of tequila!!! 17 Then the savagery commenced!! Good morning!!!" 18 Did I read that right? 19 A You did. And there's an X and fah-jah 20 after that. 21 Q Then you told Mr. Depp that you 22 prevented -- you said, "I prevented them from	1497	1 A Right. 2 MR. ROTTENBORN: Your Honor, permission 3 to move for admission of Exhibit 892 and 4 permission to publish. 5 THE COURT: All right. 6 MS. VASQUEZ: Our objection is 7 relevance. This is well past the relationship 8 between Mr. Depp and Ms. Heard. 9 THE COURT: If it's just used for 10 impeachment, why would it come into evidence? 11 MR. ROTTENBORN: Well, it's Mr. Depp's 12 statements about what he did when he pounded an 13 entire bottle of tequila and the savagery that 14 commenced. Therefore, it is his use of alcohol 15 that's -- 16 THE COURT: In 2017? 17 MR. ROTTENBORN: Uh-huh. 18 THE COURT: I'll sustain the objection. 19 MS. VASQUEZ: Thank you, Your Honor. 20 Q You're aware that Mr. Depp has used 21 drugs, right? 22 A I am.
1496	1 calling po-po" -- 2 MS. VASQUEZ: Objection, Your Honor. 3 Hearsay. Also improper impeachment. 4 MR. ROTTENBORN: That's for the context 5 of the text when he testified that he prevented 6 him. 7 THE COURT: All right. I'll allow it. 8 All right. Go ahead. 9 MR. ROTTENBORN: Thank you, Your Honor. 10 Q So then, Mr. Bett, you texted Mr. Depp 11 back two minutes later, and you said, "I prevented 12 them from calling po-po. Glad you had fun. You 13 mean dinner in room or restaurant?" 14 Do you see that? 15 A I do. 16 Q And you sent that text to Mr. Depp, 17 correct? 18 A I did. 19 Q By "po-po," you mean police, correct? 20 A That's correct. 21 Q You told them that you were glad he had 22 fun, right?	1498	1 Q And you've helped facilitate Mr. Depp's 2 drug use on occasion, correct? 3 A I haven't. 4 Q I'm sorry. 5 A I haven't. 6 Q You have not? 7 A I have not. 8 MR. ROTTENBORN: Heather, can you pull 9 up Exhibit 967, please. 10 Q Mr. Bett, feel free to take the time 11 that you need to to review this document, 12 familiarize yourself with it. 13 But my first question for you is just 14 is this a text exchange that you had with Mr. Depp 15 on June 12th, 2019? 16 A June 12th? According to these 17 transcripts, yeah. It has my name and his name on 18 there. 19 Q Right. And it starts at the bottom and 20 goes up, correct? 21 A No, I'm sorry. I wasn't paying 22 attention to the time stamps.

	1499		1501
<p>1 Q That's okay. 2 A My apologies. 3 Q Hard to orient yourself with these 4 sometimes. 5 A Okay. At the bottom, yeah, I do see 6 6/12/19 at 1:50 p.m. 7 Q And then the more recent texts are as 8 you go up the page, right? 9 A Correct. 10 Q So in the bottom text, you're telling 11 Mr. Depp that some people are at his house 12 visiting and you say, "They'll be at the pool" -- 13 MS. VASQUEZ: Objection, Your Honor. 14 Hearsay. Also relevance. This is 2019. 15 THE COURT: What's the relevance? 16 MR. ROTTENBORN: He just testified that 17 he hadn't helped facilitate Mr. Depp's drug use, 18 so this is for impeachment, and you've got to read 19 the text in context to see how it impeaches him. 20 THE COURT: All right. If you could 21 approach, please. 22 MR. ROTTENBORN: Sure.</p>		<p>1 says he hasn't helped facilitate Mr. Depp's drug 2 use. Mr. Depp is saying the "not-drugs" -- he 3 doesn't want to go downstairs because the 4 "not-drugs" is down there, meaning -- 5 THE COURT: I don't know what that 6 means. 7 MS. VASQUEZ: Yeah. I don't either. 8 That's not impeachment. That's not proper 9 impeachment. 10 MR. ROTTENBORN: I don't know what it 11 means either, but it's -- 12 THE COURT: Then how can you say it's 13 impeachment if you don't know what it means? 14 MR. ROTTENBORN: Well, I'm going to ask 15 him, "Well, he says he doesn't want to go 16 downstairs because 'the not-drugs,' meaning, like, 17 the drugs are upstairs. I don't want to go 18 downstairs." 19 THE COURT: I understand that. 20 MR. ROTTENBORN: Do you know what I'm 21 saying? 22 THE COURT: I'm going to sustain the</p>	
<p>1 (Sidebar.) 2 THE COURT: All right. This is the 3 hard copy. So you're saying this impeaches him 4 for facilitating drug use? 5 MR. ROTTENBORN: Yes, Your Honor. 6 THE COURT: I haven't read it yet, so 7 I'm not sure. Where in there do you say that 8 happens? 9 MR. ROTTENBORN: So "There's some 10 visitors to the house," if you start at the bottom 11 and read up, and Mr. Depp makes clear he doesn't 12 want them to go down and see them, and he says, 13 "the 'not-drugs' are down there" on, I think it's 14 Entry 73. And then right above that, he says -- 15 so the visitors are coming. He says -- on 74, he 16 says something about "can't go downstairs until 17 they split." And then he says "the 'not-drugs' is 18 down there. What's a boy to do?" And he says, 19 "Trying to help Daddy." 20 THE COURT: I'm sorry. What is the 21 impeachment of that? 22 MR. ROTTENBORN: The impeachment is he</p>	1500	<p>1 objection. I just don't see that as impeachment. 2 MR. ROTTENBORN: Okay. All right. 3 MS. VASQUEZ: Thank you very much, Your 4 Honor. 5 THE COURT: Okay. 6 (Open court.) 7 BY MR. ROTTENBORN: 8 Q Mr. Bett, you communicate with Mr. Depp 9 through texts, correct? 10 A I do. 11 Q That's your primary way of 12 communicating with him? 13 A Well, not primary. I mean, if I happen 14 14 to be in his presence, we'll communicate. 15 Q Sure. But in terms of written 16 communications, texting is the way that you guys 17 primarily communicate, right? 18 A Correct. 19 Q And that's the same thing that you -- 20 the same way that you communicate primarily with 21 his other employees or with his family as well, 22 right?</p>	1502

<p>1503</p> <p>1 A Yes.</p> <p>2 Q You have a practice of deleting all</p> <p>3 your texts with him at the end of the day or week,</p> <p>4 correct?</p> <p>5 A That's correct.</p> <p>6 Q So there wouldn't be texts from his</p> <p>7 time when he was in a relationship with Amber</p> <p>8 Heard that you have possession of, correct?</p> <p>9 A That's correct.</p> <p>10 Q You've never seen Amber do something</p> <p>11 that you would call physically violent or an</p> <p>12 assault of Mr. Depp, correct?</p> <p>13 A Other than when I testified that she</p> <p>14 threw a water bottle or a plastic cup in his</p> <p>15 direction.</p> <p>16 Q But you wouldn't consider that</p> <p>17 physically violent or an assault of him, correct?</p> <p>18 A Well, in California it's assault if you</p> <p>19 go to attempt to swing or throw something at</p> <p>20 somebody, even if you don't hit them.</p> <p>21 MR. ROTTENBORN: May I approach, Your</p> <p>22 Honor?</p>	<p>1505</p> <p>1 A Got it.</p> <p>2 Q And in your deposition, I asked you</p> <p>3 this question, and you gave this answer:</p> <p>4 "QUESTION: So is it fair to say that</p> <p>5 while you've seen Ms. Heard yell and get emotional</p> <p>6 toward Johnny, you've never seen her do something</p> <p>7 that you would call physically violent or assault</p> <p>8 of Johnny?</p> <p>9 "ANSWER: Correct."</p> <p>10 Did I read that right?</p> <p>11 A You did.</p> <p>12 Q I'd like to turn to May 21st, 2016.</p> <p>13 That was the incident that we talked about last</p> <p>14 night, right before you -- we adjourned for the</p> <p>15 day, correct?</p> <p>16 A Correct.</p> <p>17 Q You and Mr. Judge, Jerry Judge, brought</p> <p>18 Mr. Depp over to the penthouses at the Eastern</p> <p>19 Columbia Building that night, right?</p> <p>20 A We did.</p> <p>21 Q And you knew that he was going there to</p> <p>22 speak with Amber, correct?</p>
<p>1504</p> <p>1 THE COURT: All right.</p> <p>2 MR. ROTTENBORN: I'm just handing.</p> <p>3 THE COURT: Oh, you're just handing?</p> <p>4 MR. ROTTENBORN: I'm sorry.</p> <p>5 THE COURT: That's all right.</p> <p>6 Q Mr. Bett, do you remember giving a</p> <p>7 deposition in this case?</p> <p>8 A I do.</p> <p>9 Q And you were under oath for that</p> <p>10 deposition, correct?</p> <p>11 A I was.</p> <p>12 Q And I asked you a number of questions,</p> <p>13 right?</p> <p>14 A You asked me several, yes.</p> <p>15 Q I did. And if you can turn to page 111</p> <p>16 of this transcript, please.</p> <p>17 A (The witness complies.)</p> <p>18 Q It's on page 28 of the document.</p> <p>19 A Okay.</p> <p>20 Q If you look at line 22, the last line,</p> <p>21 and then heading over to page 112, do you see</p> <p>22 that?</p>	<p>1506</p> <p>1 A And gather some belongings.</p> <p>2 Q Your understanding was that Mr. Depp</p> <p>3 was going over there because they both wanted to</p> <p>4 talk and calm everything down, right?</p> <p>5 MS. VASQUEZ: Objection. Calls for</p> <p>6 speculation as to what Ms. Heard wanted.</p> <p>7 THE COURT: I'll sustain the objection</p> <p>8 if you want to rephrase.</p> <p>9 Q Mr. Depp told you that he and Amber</p> <p>10 were going to talk it out and talk about what's</p> <p>11 going on, correct?</p> <p>12 A Correct.</p> <p>13 Q And he had wine in the car on the way</p> <p>14 over, I believe you testified yesterday, right?</p> <p>15 A He did have a glass of wine, uh-huh.</p> <p>16 Q And I think you testified it's possible</p> <p>17 he had been drinking during the day before you</p> <p>18 brought him over there, correct?</p> <p>19 A Correct. I saw him with a wine glass</p> <p>20 after his meeting when he came out into the</p> <p>21 hallway.</p> <p>22 Q And when you -- no, I'm sorry. During</p>

<p style="text-align: right;">1507</p> <p>1 the day, before you picked him up to go over to 2 the Eastern Columbia Building, it's possible he 3 had been drinking, correct? 4 A Well, we were at a meeting. He did 5 have a glass of wine in his hand, so I presume he 6 was drinking. 7 Q Okay. And when you arrived at the 8 Eastern Columbia Building, you can't say one way 9 or the other whether Mr. Depp was carrying wine 10 with him into the building, right? 11 A I can't remember, no. 12 Q You and Mr. Judge let him into 13 penthouse 3 and were in there for just a minute or 14 two before you exited penthouse 3, correct? 15 A Yes, give or take. 16 Q And then you stayed outside in the 17 hallway of penthouse 3 for a bit, right? 18 A A short period of time, correct. 19 Q I think you testified yesterday like 20 ten minutes; is that right? 21 A Yeah, give or take. 22 Q And then you, from there, you went from</p>	<p style="text-align: right;">1509</p> <p>1 MR. ROTTENBORN: Can you rotate that, 2 please. Counterclockwise. And then maybe just 3 blow it up, please. 4 And, Your Honor, permission to publish 5 if it is not already. 6 THE COURT: It is published. 7 MR. ROTTENBORN: Thank you. Oh, thank 8 you. 9 Q So, Mr. Bett, if you -- just to orient 10 us, am I correct in saying that the -- well, could 11 you put your finger just on the guard shack area 12 of penthouse 5, please? 13 A Sure it's just -- the diagram, the 14 schematics, is kind of off because of the way 15 Broadway is set up. It doesn't coincide with the 16 way the buildings were. But I can make an attempt 17 to show you where the... 18 Q Yeah. I think the screen will make a 19 mark if you show on it. 20 A Okay. I mean, I'm having a... 21 Q Okay. 22 A I'm not seeing the marks. So this is,</p>
<p style="text-align: right;">1508</p> <p>1 the hallway outside of penthouse 3 to penthouse 5, 2 the storage area where you had a couch and a TV 3 and that sort of thing that you testified about, 4 right? 5 A That's correct. 6 Q Is that also known as the "guard 7 shack"? 8 A Modified version of the guard shack. 9 It's just a place for us, as I testified 10 yesterday, to, you know, rest or have lunch or 11 some coffee. 12 Q Sometimes called the "cubbyhole"; is 13 that right? 14 A We might have called it that. I can't 15 remember. 16 Q Okay. Just to orient us. 17 MR. ROTTENBORN: Heather, can you 18 please pull up Plaintiff's Exhibit 116. 19 And, Your Honor, I believe this has 20 already been entered into evidence. 21 THE COURT: I do believe so. Yes, it's 22 in evidence. So you can...</p>	<p style="text-align: right;">1510</p> <p>1 I'd say, right in this area right here. 2 Q Okay. 3 A Is it showing up? 4 THE COURT: Yes. 5 A Because there would be elevators to the 6 right. 7 Q It is. 8 A Okay. 9 Q Yeah, yeah, that's showing up. 10 A Okay. 11 Q So that's down the hall from outside of 12 penthouse 3, right? 13 A Correct. 14 Q And you stayed in that guard shack for, 15 I believe you said, five to ten minutes; is that 16 right? 17 A Yes. 18 Q So if you spent about ten minutes 19 outside penthouse 3 and then five to ten minutes 20 inside the guard shack, you say you were at the 21 building for, what, a total of 30 minutes or so? 22 A It could have been a little bit longer.</p>

<p>1511</p> <p>1 It could have been 40, could have been closer to 2 an hour. It was quite some time ago. 3 Q But you're fairly confident it was 40 4 minutes to an hour? 5 A Around that time frame, correct. 6 Q And you said that you arrived at the 7 building sometime between 7:15 and 7:45; is that 8 what you said yesterday? 9 A Yeah. 10 Q What's your best guess? 11 A It would be an estimate guess, maybe 12 more towards eightish, but, again, it could have 13 been 7:30, I just... 14 Q Okay. More towards eightish? All 15 right. And so you stayed in the guard shack for 16 five to ten minutes, and then you left the guard 17 shack and headed back up the hall toward the door 18 of penthouse 3, right? 19 A Yes. 20 Q And at some point, you heard Amber 21 shouting, and you let yourself into penthouse 3, 22 right?</p>	<p>1513</p> <p>1 THE COURT: I'll sustain that 2 objection. Next question, please. 3 Q And you can't remember if she had any 4 makeup on or not, right? 5 A If she did, she had very little. 6 Q You just can't remember if she did, 7 right? 8 A I mean, yeah. I mean, it's possible, 9 but it was a long time ago. 10 Q Turn to page 160, please, in your 11 deposition. 12 A Okay. That would be page 40 as well? 13 Q Page 40, yeah. Yes, sir. 14 A Okay. 15 Q And on line 1, I asked you the 16 question, "Did Ms. Heard have any -- you couldn't 17 tell if she was wearing any makeup, right?" 18 Your answer was "I can't remember if 19 she had any makeup on or not." 20 Did I read that right? 21 A You did. 22 Q And you don't know what -- you have no</p>
<p>1512</p> <p>1 A That's correct. 2 Q The closest you got to Amber when you 3 went into penthouse 3 was 15 to 20 feet, right? 4 A Around that, correct. 5 Q And you were in penthouse 3 for just 6 about 30 seconds to a minute before you left again 7 with Mr. Depp, right? 8 A Around that time frame. 9 Q You don't remember what Ms. Heard was 10 wearing, do you? 11 A I don't. 12 Q And you can't remember if she was 13 crying when you saw her, right? 14 A I didn't see her crying. 15 Q You can't remember if she was crying, 16 right? 17 A I just said I didn't see her crying. 18 Q She could have been crying, right? 19 MS. VASQUEZ: Objection. Calls for 20 speculation and asked and answered. 21 MR. ROTTENBORN: It's a different 22 question.</p>	<p>1514</p> <p>1 personal knowledge of what transpired in 2 penthouse 3 while you were outside of it that 3 evening, correct? 4 A I don't. 5 Q And you have no personal knowledge of 6 whether Amber had a phone thrown at her face by 7 Johnny Depp that evening, correct? 8 A I don't. 9 Q Because you weren't there, right? 10 A That's correct. 11 Q So you left penthouse 3, and then you 12 went into penthouse 5 at Mr. Depp's insistence 13 that he get into penthouse 5, right? 14 A That's correct. 15 Q And he was agitated at this time, 16 right? 17 A I'm sorry. You say I went into 18 penthouse 3 or penthouse 5 at this time? 19 Q I'm sorry. You left penthouse 3 after 20 30 to 60 seconds with Mr. Depp and Mr. Judge, and 21 you went to penthouse 5, right? 22 A Correct.</p>

1515	1 Q And that's because Mr. Depp was 2 demanding to get into penthouse 5, right? 3 A Yes. 4 Q And Mr. Depp was agitated at this time, 5 right? 6 A Yeah, I'd say he was agitated. 7 Q And one of the reasons that you could 8 tell that he was agitated was because this wasn't 9 the first time you had seen him agitated, right? 10 A Well, no. 11 Q Mr. Depp told you to let him into 12 penthouse 5 and you did that, right? 13 A Yes. 14 Q And when he left penthouse 3 to go to 15 penthouse 5, you can't remember if he had wine in 16 his hand or not, correct? 17 A I can't. 18 Q I'm sorry? 19 A I can't. 20 Q Cannot? 21 A Cannot. 22 Q And when you walked into penthouse 5	1517	1 Q And Ms. Heard may have suffered 2 injuries at the hands of Mr. Depp over the years 3 that you didn't witness or you didn't see, 4 correct? 5 A That's correct. 6 Q I'd like to end by just taking a look 7 at the videos of you entering and exiting the 8 building, I believe. 9 MR. ROTTENBORN: Heather, could you 10 pull up Exhibit 672. 11 Your Honor, I believe that these were 12 part of Mr. Patterson's deposition and that 13 they've been admitted. 14 THE COURT: I do have 672 admitted, 15 correct. 16 MS. VASQUEZ: Yes, that's correct, Your 17 Honor. Thank you. 18 MR. ROTTENBORN: And the next one will 19 be 666, just to confirm. 20 THE COURT: Okay. All right. We have 21 that as well. 22 MR. ROTTENBORN: Thank you, Your Honor.
1516	1 inside were Rocky Pennington; her fiancé, Josh 2 Drew; and another woman and a dog, right? 3 A That's correct. 4 Q Mr. Depp told them to get out of his 5 penthouse, right? 6 A Yes. 7 Q And they exited, right? 8 A They did. 9 Q And you can't remember one way or the 10 other whether Mr. Depp knocked anything off the 11 table in any of the penthouses, right? 12 A It's possible he did, but I can't 13 remember. 14 Q Did you or Mr. Judge, just to be clear, 15 did you or Mr. Judge destroy any property or knock 16 anything off tables in any of the penthouses that 17 evening? 18 A No. 19 Q You have no personal knowledge of 20 whether or not Mr. Depp was violent to Ms. Heard 21 at times when you weren't around them, correct? 22 A I have no knowledge.	1518	1 Heather, could you play this starting 2 at 1. Actually, before we start -- 3 Q Do you see this on your screen, 4 Mr. Bett? 5 A I do. 6 Q And you see the time stamp at the 7 bottom? That shows what time the camera -- the 8 video was taken, correct? 9 A I see the time stamp and the date. 10 Q Okay. 11 MR. ROTTENBORN: Let's go ahead and 12 play this, Heather. Start at 1:55. 13 (Whereupon, a video clip was shown.) 14 Q That's you in that black-and-white 15 shirt, right? 16 A That's me. 17 Q That's Mr. Depp in the hat? 18 A Correct. 19 Q And that's Mr. Judge to his left? 20 A Correct. 21 Q And this video is when you're entering 22 the Eastern Columbia Building to take him to

1519	1521
<p>1 penthouse 3, correct? 2 A Correct. 3 Q So it's actually a good bit earlier 4 than you testified to, right, it's at 7:02, if I'm 5 converting military time to -- 6 A Well, that's what the time stamp says. 7 I mean, I don't know how it was calibrated and so 8 forth. But according to the screen, it does say 9 19:02 hours, which is 7:02. 10 Q 7:02 p.m., right? 11 A Correct. 12 Q On May 21st, 2016? 13 A Correct. 14 MR. ROTTENBORN: Heather, you can take 15 that down. And please pull up Exhibit 666. 16 Q And you see that the time stamp on this 17 video is -- well, let's go ahead and play the 18 video first. 19 (Whereupon, a video clip was shown.) 20 Q And that's you on the right again, 21 right? 22 A It is.</p>	<p>1 BY MS. VASQUEZ: 2 Q Mr. Bett, you previously testified that 3 when you left penthouse 3 and went into 4 penthouse 5, who was inside that penthouse when 5 you entered with Mr. Depp? 6 A Josh Drew, an unknown female, and a 7 little dog. 8 Q Was Ms. Pennington inside penthouse 3 9 when you entered with Mr. Depp? 10 A I'm sorry. You said penthouse 5, 11 didn't you? Am I getting my numbers... 12 Q You're right. My apologies. 13 A I'm sorry. 14 Q Let me start over, confusing. 15 When you left penthouse 3 and went into 16 penthouse 5, who was inside? Try this again. 17 A Okay. Josh Drew, an unknown female, 18 and a cute little dog. 19 Q Where was Ms. Pennington? Was she 20 inside penthouse 3 when you entered -- or 21 penthouse 5 when you entered? 22 A She was not in penthouse 5, no.</p>
<p>1 Q And that's Mr. Judge in the middle, 2 right? 3 A Yes. 4 Q And that's Mr. Depp on the left, 5 correct? 6 A Yes, yes. 7 Q And the time stamp on this video is 8 20:29, or 8:29 p.m., right? 9 A That's correct. 10 Q So you were actually in the Eastern 11 Columbia Building for about an hour and a half 12 that evening, right? 13 A Well, according to these time stamps, 14 yes, it does say that. It didn't seem like it was 15 that long. 16 MR. ROTTENBORN: I have nothing 17 further, thank you. 18 THE WITNESS: Thank you. 19 THE COURT: All right. Redirect. 20 EXAMINATION BY COUNSEL FOR THE PLAINTIFF AND 21 COUNTERCLAIM DEFENDANT 22</p>	<p>1 Q Where was the last place you saw 2 Ms. Pennington on May 21st? 3 A She was standing next to Ms. Heard in 4 penthouse number 3. 5 Q I think there's been also a little bit 6 of confusion about April 21st, 2016 and May 21st, 7 2016. So let's start with April 21st, 2016. 8 MR. ROTTENBORN: Objection just to 9 the -- Ms. Vasquez testifying. 10 MS. VASQUEZ: I'm just trying to orient 11 the witness, Your Honor. 12 THE COURT: All right. Well, go ahead. 13 MS. VASQUEZ: I'll try to limit that. 14 THE COURT: Thank you. 15 Q Where was Mr. Depp on April 21st, 2016? 16 A On April 21st, he was at a meeting in 17 his production office. 18 Q Okay. And I believe you testified 19 previously that you saw him holding a glass of 20 wine; is that right? 21 A Correct. 22 Q Okay. Did he appear intoxicated to you</p>

<p style="text-align: right;">1523</p> <p>1 after that meeting? 2 A He didn't. 3 Q I'm sorry? I didn't catch that. 4 A He did not. 5 Q He did not, okay. 6 Now, on May 21st, 2016, was Mr. Depp 7 drinking wine that day? 8 A He did have wine with him, yes, 9 correct. 10 Q And at what point did you observe 11 Mr. Depp with wine on May 21st, 2016? 12 A He probably had it in the car with him 13 when we were driving down, and he could have 14 finished it prior to us walking to penthouse 3. 15 Q And did Mr. Depp, based on your 16 observations, Mr. Bett, appear intoxicated to you 17 on May 21st, 2016, before he arrived to the 18 Eastern Columbia Building? 19 A He didn't. 20 Q He did not? 21 A He did not. 22 Q Did you ever observe anything that made</p>	<p style="text-align: right;">1525</p> <p>1 day, sir. 2 All right. Your next witness. 3 MR. CHEW: Thanks, Your Honor. 4 Plaintiff calls Keenan Wyatt. 5 THE COURT: Keenan Wyatt. Can you 6 spell that name for me? 7 MR. CHEW: K-E-E-N-A-N, last name 8 Wyatt, W-A -- W-Y-A-T-T. 9 THE COURT: All right. Thanks so much. 10 MR. CHEW: Thank you, Your Honor. 11 THE COURT: All right. Mr. Wyatt. 12 KEENAN WYATT 13 a witness called on behalf of the 14 plaintiff and counterclaim defendant, having been 15 duly sworn by the clerk, was examined and 16 testified as follows: 17 EXAMINATION BY COUNSEL FOR THE PLAINTIFF AND 18 COUNTERCLAIM DEFENDANT 19 THE COURT: Yes, sir. 20 BY MR. CHEW: 21 Q Good morning, Mr. Wyatt. 22 A Good morning.</p>
<p style="text-align: right;">1524</p> <p>1 you concerned for Ms. Heard's safety? 2 MR. ROTTENBORN: Objection. 3 Foundation. And leading. 4 THE COURT: I'll allow it if you can 5 answer it this way. 6 A I did not. 7 Q What, if anything, did you observe that 8 made you concerned for Mr. Depp's safety? 9 A From the injuries I saw on his face 10 when, on a few occasions, I took photos of them. 11 MS. VASQUEZ: Okay. Nothing further. 12 Thank you, Your Honor. 13 THE COURT: All right. Is this witness 14 subject to recall? 15 MS. VASQUEZ: No, Your Honor. 16 THE COURT: Not subject to recall. 17 MR. ROTTENBORN: No, Your Honor. 18 THE COURT: Okay. So you're free to 19 go, or you can have a seat in the courtroom. It's 20 up to you, all right? 21 THE WITNESS: Thank you so much. 22 THE COURT: Thank you. You have a good</p>	<p style="text-align: right;">1526</p> <p>1 Q Would you please state your full name 2 for the record? 3 A Keenan Wyatt. 4 Q Mr. Wyatt, where do you live? 5 A Thousand Oaks, California. 6 Q What do you do for a living? 7 A I'm a sound technician on feature 8 films. 9 Q How long have you been a sound 10 technician on feature films? 11 A Over 35 years. 12 Q Would you please briefly describe for 13 the jury what a sound technician on films work -- 14 does? 15 A Well, the -- technically, just do the 16 dialogue recording while on the set so it's as 17 clean as possible. 18 Q Do you know Johnny Depp? 19 A Yes, I do. 20 Q How do you know Mr. Depp? 21 A I've known Johnny for over 25 years, 22 and we're good friends.</p>

1527	1529
<p>1 Q Have you ever worked with Mr. Depp? 2 A Yes, I have. 3 Q For how many of Mr. Depp's films have 4 you worked with him as the sound technician? 5 A Dozens. Dozens of films. 6 Q Would you please name a few of them for 7 the jury if you can remember? 8 A I've done the five Pirates of the 9 Caribbean movies, Alice in Wonderland, Rum Diary, 10 Charlie and the Chocolate Factory, Ninth Gate, 11 Lone Ranger, a number of films. 12 Q What part did Mr. Depp play in the five 13 Pirates of the Caribbean movies? 14 A Captain Jack Sparrow. 15 Q Are you, Mr. Wyatt, are you currently 16 employed by Mr. Depp? 17 A No. 18 Q Have you ever been employed by 19 Mr. Depp? 20 A No. 21 Q Have you ever been paid by Mr. Depp? 22 A No.</p>	<p>1 Mr. Depp worked together? 2 A Oh, many directors. But we've done 3 several films, multiple films with multiple 4 directors. Like Tim Burton, Gore Verbinski, Rob 5 Marshall, we've done multiple films with them. 6 Q Why did you and Mr. Depp work with 7 those directors more than once? 8 A Johnny makes it easy to work with. 9 MS. BREDEHOFT: Objection. Foundation. 10 MR. CHEW: Your Honor, he's laid the 11 foundation. He's worked with Mr. Depp for 25 12 years on more than ten feature films. 13 MS. BREDEHOFT: And relevance. 14 THE COURT: I'll allow it. Go ahead. 15 MR. CHEW: Thank you, Your Honor. 16 Q Why did you and Mr. Depp work with 17 those directors more than once? 18 A Well, he -- the directors like working 19 for him. He comes with -- 20 MS. BREDEHOFT: Objection. Hearsay. 21 Move to strike. 22 MR. CHEW: Your Honor, you just allowed</p>
1528	1530
<p>1 Q Have you ever worked for any of 2 Mr. Depp's companies? 3 A Yes. I worked for Infinitum Nihil. 4 Q When was the last time you worked for 5 Infinitum Nihil? 6 A Last time I was there was probably 7 2017. I worked on a contract basis with him, not 8 as an employee. 9 Q And would you very briefly describe for 10 the jury what work you did for Infinitum Nihil in 11 2017? 12 A I ran the media library with him, did 13 some archiving, recording, editing, things like 14 that. 15 Q How would you describe, briefly, your 16 working relationship with Mr. Depp in the 25 years 17 or so that you've worked together? 18 A Johnny's great to work with on films. 19 He always comes very prepared and knows what he 20 wants to do and makes it for a fun day when we're 21 shooting. 22 Q With what directors have you and</p>	<p>1 the question. 2 THE COURT: I'll allow it. Go ahead. 3 A Johnny makes it easy to work with. He 4 comes prepared. He knows what he wants to do with 5 the characters, and he collaborates very well with 6 the directors. 7 Q Is Pirates 5 one of the feature films 8 on which you worked together with Mr. Depp? 9 A Yes. 10 Q Was Mr. Depp ever late to the set on 11 Pirates 5? 12 A Yes. 13 Q Do you know why Mr. Depp was late on 14 those occasions? 15 A Well, arguing going on between him and 16 Amber. 17 MS. BREDEHOFT: Objection. Hearsay, 18 foundation. 19 THE COURT: I'll sustain the objection. 20 Q What basis -- strike that. 21 Did you communicate with crew members 22 on the set of Pirates 5?</p>

1531	<p>1 A Every day, yes.</p> <p>2 Q Was Mr. Depp's lateness a problem for</p> <p>3 the crew?</p> <p>4 MS. BREDEHOFT: Objection. Calls for</p> <p>5 hearsay.</p> <p>6 THE COURT: All right. I'll sustain as</p> <p>7 to what the crew may have told him.</p> <p>8 MR. CHEW: Well, I was just asking the</p> <p>9 threshold question of whether he had spoken with</p> <p>10 the crew.</p> <p>11 THE COURT: Right. I'll sustain the</p> <p>12 objection.</p> <p>13 Q Putting aside occasional lateness on</p> <p>14 the set of Pirates 5, was production of Pirates 5</p> <p>15 ever suspended for any period of time?</p> <p>16 MS. BREDEHOFT: Objection. Calls for</p> <p>17 hearsay, foundation. How would he know that?</p> <p>18 THE COURT: If you can ask how he knew</p> <p>19 it, if you want to lay the foundation, that's</p> <p>20 fine.</p> <p>21 Q How would you know whether the</p> <p>22 production of Pirates 5 was ever suspended?</p>	1533	<p>1 A He's an executive at Disney.</p> <p>2 Q After Mr. Depp returned to the set of</p> <p>3 Pirates 5 in Australia, what, if any, interactions</p> <p>4 did you observe between Mr. Depp and Mr. Bailey?</p> <p>5 A Sean had come to set one day and sat</p> <p>6 and talked with Johnny for a while, and they</p> <p>7 talked about collaborating and doing some stuff in</p> <p>8 the future.</p> <p>9 Q Was it a friendly conversation?</p> <p>10 A Absolutely, yes.</p> <p>11 Q Has Mr. Depp ever worn an earpiece in</p> <p>12 any of the many movies in which you've worked with</p> <p>13 him?</p> <p>14 A Yes.</p> <p>15 Q For what purpose are earpieces</p> <p>16 generally used by actors on sets?</p> <p>17 A Well, I believe it was --</p> <p>18 MS. BREDEHOFT: Objection, Your Honor.</p> <p>19 First of all, relevance, foundation.</p> <p>20 THE COURT: What's the relevance?</p> <p>21 MS. BREDEHOFT: Hearsay.</p> <p>22 MR. CHEW: May we approach, Your Honor?</p>
1532	<p>1 A I was on the film. I was working on</p> <p>2 the film.</p> <p>3 THE COURT: Okay.</p> <p>4 A So I know it was suspended for probably</p> <p>5 for two or three weeks.</p> <p>6 Q And why was it suspended for two or</p> <p>7 three weeks?</p> <p>8 A Johnny had to go back to Los Angeles</p> <p>9 because his finger had been cut off, tip of his</p> <p>10 finger had been cut off.</p> <p>11 Q Do you have any understanding of how</p> <p>12 Mr. Depp's, or the top of Mr. Depp's finger was</p> <p>13 cut off?</p> <p>14 A No, I don't know.</p> <p>15 THE COURT: Okay.</p> <p>16 Q And I believe you testified that</p> <p>17 production was suspended for a period of two or</p> <p>18 three weeks. Did there come a time when Mr. Depp</p> <p>19 returned from Los Angeles to Australia for</p> <p>20 completion of the shooting of Pirates 5?</p> <p>21 A Yes, he did.</p> <p>22 Q Who is Sean Bailey?</p>	1534	<p>1 THE COURT: Okay. Sure.</p> <p>2 (Sidebar.)</p> <p>3 MR. CHEW: Your Honor, this is very few</p> <p>4 questions about this. Part of their case is that</p> <p>5 Johnny is an alcoholic and a drug addict, and he</p> <p>6 can't remember his lines. And I need to establish</p> <p>7 that he uses earpieces for a very different</p> <p>8 reason.</p> <p>9 THE COURT: Well, I think if you want</p> <p>10 to direct it towards him, but the last question</p> <p>11 you said was "Why do people generally use</p> <p>12 earpieces in the film?"</p> <p>13 MR. CHEW: I was just trying to ask</p> <p>14 that one question just to establish what --</p> <p>15 THE COURT: That's all right. If you</p> <p>16 want to just direct it to Johnny Depp, that's</p> <p>17 fine.</p> <p>18 MR. CHEW: Okay. Thank you, Your</p> <p>19 Honor.</p> <p>20 THE COURT: Uh-huh.</p> <p>21 (Open court.)</p> <p>22</p>

<p>1535</p> <p>1 BY MR. CHEW: 2 Q Mr. Wyatt, has Mr. Depp ever worn an 3 earpiece in any of the movies in which you've 4 worked with him? 5 MS. BREDEHOFT: Objection. Leading. 6 THE COURT: I'll allow it. And he 7 already answered it anyway, but... 8 THE COURT: That's okay. I'll allow 9 it. 10 A Yes, he has. 11 Q When was the first time you used an 12 earpiece with Mr. Depp? 13 A First time we used it was on a movie he 14 was directing called The Brave. We were doing a 15 scene with Marlon Brando who wears an earpiece for 16 receiving his dialogue. 17 MS. BREDEHOFT: Objection. 18 THE COURT: I'll allow it. That's 19 fine. Go ahead. 20 A Marlon uses an earpiece for his 21 dialogue, and it was a long shooting day. And we 22 let Johnny, as the director, let Marlon go after</p>	<p>1537</p> <p>1 read lines to him? 2 A Yes. 3 Q Why did you read lines to Mr. Depp? 4 A Johnny typically likes to go into 5 makeup in the morning and write his own dialogue 6 and rewrite his dialogue, so sometimes there's not 7 enough time to always, you know, to remember the 8 lines and learn them, so I would remind him in his 9 ear sometimes while music was playing at the same 10 time. 11 Q And, Mr. Wyatt, in your long experience 12 working with Mr. Depp on films, how would you 13 describe his level of preparedness on the set? 14 A He's absolutely prepared. He knows 15 what he wants the character to be. He 16 collaborates with the director on what his ideas 17 are, but he always comes very prepared. 18 Q And, Mr. Wyatt, during your long 19 relationship with Mr. Depp, what, if any, 20 opportunity have you had to observe his sense of 21 humor? 22 A Quite often.</p>
<p>1536</p> <p>1 we shot Marlon's section of the film. And then, 2 too, for Johnny's character to act against 3 something other than just a blank nothing, we put 4 Marlon's performance in an earpiece into Johnny so 5 he could act up against Marlon's performance. 6 Q Did Mr. Depp ever use an earpiece for 7 some other purpose other than listening to 8 Mr. Brando's dialogue? 9 A After that we started using an earpiece 10 all the time where Johnny would listen to music 11 while acting. We would play all different kinds 12 of music depending on the character he was 13 playing. He and I would talk about it beforehand, 14 and sometimes it would be classical, sometimes it 15 would be rock, sometimes it would be blues. It 16 depended on the character. 17 Q To what extent, if any, did you and 18 Mr. Depp use that process in other movies in which 19 you worked together? 20 A We used that on every movie. 21 Q Mr. Wyatt, on those occasions, in 22 addition to feeding Mr. Depp music, did you ever</p>	<p>1538</p> <p>1 Q How would you describe to the jury 2 Mr. Depp's sense of humor? 3 A He likes, like, British humor. He's 4 sometimes a little dark, maybe. He likes plays on 5 words, that sort of thing. 6 Q Monty Python? 7 A Monty Python, there's a show in England 8 called The Fast Show, which he used to love 9 watching. 10 Q Mr. Wyatt, what, if any, relationship 11 do you have with Mr. Depp outside of your working 12 relationship? 13 A We're close. I used to, after a film, 14 sometimes he'd call, and I would go on vacation 15 with he and his family. 16 Q On what occasions would you go on 17 vacation with Mr. Depp and his family? 18 A Well, he would call after a film, and 19 he would be going away with the kids and Vanessa, 20 and he would say, "Hey, you know, we're going to 21 the island. Would you come with me?" and stuff or 22 "We're going to France. Would you come along?"</p>

1539	<p>1 And sure, why not? 2 Q Would you please give the jury 3 Vanessa's full name? 4 A Vanessa Paradis. 5 Q And would you please tell the jury who 6 she is? 7 A She is the mother of Johnny's two kids, 8 Jack and Lily-Rose. 9 Q And, Mr. Wyatt, on how many occasions, 10 if you can recall, did you accompany Mr. Depp, 11 Ms. Paradis, and Johnny's two children on 12 vacations? 13 A Several times. 14 Q On those several occasions where you 15 accompanied them on vacation, did you ever observe 16 Mr. Depp and Vanessa interact with each other? 17 A Sure. Yes. 18 Q Would you please tell the jury what you 19 observed? 20 A They were a loving couple, and 21 everything was fine. It was a family. 22 Q Did you ever hear or see Mr. Depp yell</p>	1541	<p>1 Q Did he ever yell or raise his voice at 2 his children? 3 A Not that I recall. Nothing that stands 4 out, no. 5 Q Mr. Wyatt, on what, if any, occasions 6 have you seen Mr. Depp drink alcohol? 7 A We would drink – we'd drink alcohol 8 quite often. 9 Q And on those occasions in which you had 10 alcohol with Mr. Depp, how, if at all, did his 11 behavior change? 12 A I don't remember it changing at all. I 13 don't remember it changing. 14 Q It didn't make him angry? 15 A No, no. Sleepy. 16 Q Have you ever seen Mr. Depp use drugs? 17 A I've seen him take pills. Don't know 18 what they were. I wouldn't know what they were, 19 but that's all. 20 Q Based on your observations when you 21 have seen him taking pills, how, if at all, did 22 the taking of pills affect his behavior?</p>
1540	<p>1 or raise his voice at Vanessa Paradis, the mother 2 of his children? 3 A Not that I recall. 4 Q Did you ever, on any occasion, see 5 Mr. Depp physically abuse Vanessa? 6 A Never. 7 Q And I believe you testified, Mr. Wyatt, 8 that Mr. Depp's and Ms. Paradis's children, 9 Lily-Rose and Jack, were there on those vacations; 10 is that correct? 11 A Yes. 12 Q Did you have occasion to observe 13 Mr. Depp's interactions with his children? 14 A Sure. Yes. 15 Q Would you please describe for the jury, 16 very briefly, Mr. Depp's interactions with his 17 children, Jack and Lily-Rose? 18 A He was a very loving father. He used 19 to do stuff with the kids all the time, going 20 swimming at the island and teaching them scuba 21 diving and, you know, just drawing, a lot of 22 drawing, doing artwork.</p>	1542	<p>1 A I didn't see any change in Johnny. I 2 don't recall anything changing. 3 Q Mr. Wyatt, do you know the defendant in 4 this case, Ms. Amber Heard? 5 A Yes. 6 Q When did you first meet Ms. Heard? 7 A On the set of Rum Diary. 8 Q On how many occasions, if at all, did 9 you see Ms. Heard after that? 10 A Several. Several times. 11 Q Would you please describe for the jury, 12 very briefly, your relationship with Ms. Heard 13 after you saw her the first few times? 14 A I mean, I don't really have a 15 relationship with her. We didn't sit and talk. I 16 didn't – I didn't hang out with her or anything 17 like that. 18 Q Did there come a time when you became 19 aware that Mr. Depp and Ms. Heard were 20 romantically involved? 21 A Yes. 22 Q How often did you see Mr. Depp after he</p>

<p style="text-align: right;">1543</p> <p>1 started a romantic relationship with Ms. Heard? 2 A Oh, I don't recall. I didn't see him 3 that often, but I don't recall how often, how 4 often, but I didn't see him -- I didn't see him 5 that much. 6 Q How often were you together -- strike 7 that. 8 How often did you interact with 9 Mr. Depp and Ms. Heard when the two of them were 10 together? 11 A Just only occasionally did I see them. 12 We would -- I would leave them alone, let him have 13 his time with Amber. I wasn't into interfering. 14 Q And on those occasions where you 15 interacted with Mr. Depp and Ms. Heard as a 16 couple, did you ever hear Mr. Depp yell at or 17 raise his voice to Ms. Heard? 18 A No. 19 Q On what occasions, if any, did he ever 20 raise his hand to or otherwise abuse Ms. Heard? 21 A I've never seen him be violent towards 22 anybody.</p>	<p style="text-align: right;">1545</p> <p>1 that flight. I didn't travel with the two of them 2 that often. I was probably headed back to 3 Los Angeles to see my daughter. 4 Q And before you got on the flight, how 5 did you arrive at the airport that night? 6 A We came in a car. 7 Q When you say you came in the car, with 8 whom did you come in the car? 9 A It was Jerry, Stephen, Nathan, Johnny, 10 and myself. 11 Q And who is Nathan? 12 A Nathan is his -- is Johnny's other 13 assistant, Nathan Holmes. 14 Q What, if any, alcohol or drugs did you 15 see Mr. Depp take while on the car ride to the 16 airport? 17 A On the car ride, I don't recall 18 anything being taken. We -- Johnny, I know, had 19 called Jack during the car ride to talk to him to 20 tell him we were on our way, and we were listening 21 to the World Cup that was going on at the time. 22 Q And if you could, just remind the jury</p>
<p style="text-align: right;">1544</p> <p>1 Q And if we could -- did there come a -- 2 switch gears here. 3 Did there come a time in May 2014 when 4 you traveled with Mr. Depp and Ms. Heard by 5 private plane from Boston to Los Angeles? 6 A Yes. 7 Q Who else was on that Boston plane 8 flight? 9 A It was Amber and Johnny, Stephen, 10 Savannah, and Jerry Judge and myself. 11 Q And would you, please, tell the jury 12 who is Stephen? 13 A Stephen Deuters is Johnny's assistant. 14 Q Who was Savannah? 15 A Savannah was Amber's assistant. 16 Q And I think the jury has heard the name 17 Jerry Judge, but if you could, please, explain to 18 the jury again who Jerry Judge is. 19 A Jerry Judge is Johnny's security. 20 Q Mr. Wyatt, why were you on that flight 21 that night? 22 A I don't know the exact circumstances of</p>	<p style="text-align: right;">1546</p> <p>1 who Jack is. 2 A Jack is Johnny's little boy. 3 Q When you and Mr. Depp and the security 4 personnel arrived at the plane, who, if anyone, 5 was there at the plane? 6 A The plane had come from New York with 7 Amber and Savannah already on it. 8 Q What, if anything, did you observe 9 about Ms. Heard's behavior on that Boston flight? 10 A Well, she was giving Johnny the cold 11 shoulder, being quiet, and, you know, seemed 12 pouty. 13 Q What, if any, conversation did you have 14 with Ms. Heard on the flight? 15 A At one point I went up to her and said 16 something to the effect of, you know, "He cares 17 about you," and all of a sudden she snapped and 18 started yelling at me, "How dare you talk to me? 19 Get away from me." You know, so I went back to 20 the seat and minded my own business. 21 Q When she said those things to you, 22 would you describe the tone of her voice if you</p>

1547	1549
<p>1 remember it? 2 A She was abruptly loud. It was a quiet 3 plane; all of a sudden it got very loud. 4 Q And I believe you testified you went 5 back to your seat -- 6 A Yeah. 7 Q -- or you moved. What happened next? 8 A Johnny had said something to her, like, 9 you know, "Don't talk to my friend that way," and 10 I just stayed in my seat and finished the rest of 11 the flight. 12 Q And after you went back to your seat, 13 to what extent, if any, were you able to see 14 Mr. Depp and Ms. Heard? 15 A I was able to see them very clearly. 16 Q What, if any, violence or physical 17 altercation did you observe between Mr. Depp and 18 Ms. Heard once you'd gone back to your seat? 19 A I've never seen Johnny be violent 20 towards anybody. 21 Q To what extent, if any, did you observe 22 Mr. Depp or Ms. Heard hit, kick, or throw anything</p>	<p>1 relevance? 2 MR. CHEW: May we approach, Your Honor? 3 THE COURT: Okay. 4 (Sidebar.) 5 MR. CHEW: I'm just getting to the 6 rushed nature of the wedding and how they all 7 found out about it at the last minute. I mean, I 8 think it's relevant because he saw them interact, 9 so I'm asking him how they interacted. 10 THE COURT: Okay. You can get to the 11 wedding. I'm not sure it's relevant how he found 12 out about it. 13 MR. CHEW: Understood. 14 THE COURT: Okay. 15 MS. BREDEHOFT: And that's fine. 16 MR. CHEW: Thank you. 17 (Open court.) 18 BY MR. CHEW: 19 Q Mr. Wyatt, did you end up attending the 20 wedding? 21 A Yes, I did. 22 Q Where was that? Where did the wedding</p>
1548	1550
<p>1 at each other on the plane? 2 A No. I don't recall that at all. 3 Q Mr. Wyatt, was Mr. Depp consuming any 4 alcohol on that flight? 5 A Sure, yes. 6 Q Did he seem intoxicated? 7 A Seem intoxicated? No. He seemed like 8 Johnny. No. He seemed normal. 9 Q Did there come a time, Mr. Wyatt, when 10 you learned that Mr. Depp and Ms. Heard were 11 getting married to each other? 12 A Yes. 13 Q How did you find out about that there 14 would be a wedding? 15 A I was at the Infinitum office, and 16 Christi came to me and said, "Hey" -- 17 MS. BREDEHOFT: Objection. Hearsay. 18 MR. CHEW: I'm just asking. It's not 19 for the proof. I'm just asking him how he found 20 out about the wedding. 21 MS. BREDEHOFT: Relevance. 22 THE COURT: All right. What's the</p>	<p>1 take place? 2 A There were two weddings, one at 3 Betty Sue's house, Johnny's mom's house, and then 4 another one on the island. The one on the island 5 I did not attend. 6 Q What, if anything, did you observe at 7 the Los Angeles ceremony that you attended at 8 Betty~Sue, Mr. Depp's mother's house? 9 A It was all very quick. I mean we all 10 found out about it at the last moment. It was a 11 bit of confusion. Johnny had a friend from out of 12 town, and she wasn't sure what was going on. 13 Little Jack didn't understand what was going on. 14 MS. BREDEHOFT: Objection. Hearsay. 15 THE COURT: I'll sustain as to other 16 people. Go ahead. 17 BY MR. CHEW: 18 Q What, if anything, did you observe 19 about Ms. Heard's demeanor at the ceremony? 20 A She was very happy go lucky. She was 21 all dressed up. All of her friends were nicely 22 dressed up and ready for a wedding.</p>

<p style="text-align: right;">1551</p> <p>1 Q Have you ever, in the course of your 2 interactions with Ms. Heard, ever seen any marks, 3 injuries, or bruises on her? 4 A I have not, no. 5 Q During the decades that you have known 6 Mr. Depp, to what extent, if any, are you aware of 7 any woman other than Ms. Heard accusing him of 8 abuse? 9 MS. BREDEHOFT: Objection, Your Honor. 10 Foundation, hearsay. 11 THE COURT: I'll allow it. 12 A I've never seen Johnny abuse anybody, 13 ever. 14 MR. CHEW: Thank you very much, 15 Mr. Wyatt. That's all I have right now. 16 THE COURT: Why don't we go ahead and 17 take our break? 18 Let's go ahead and take our morning 19 break for 15 minutes. Do not say anything to -- 20 do not talk to anybody about the case, and don't 21 look up anything. If a juror needs to address 22 something to me, please write it down and give it</p>	<p style="text-align: right;">1553</p> <p>1 find the juror, the young man in the back. 2 MS. BREDEHOFT: Number 4. 3 THE COURT: Number 4. He's feeling 4 very anxious. He seems to be having some sort of 5 mental health issue, but he says he's okay right 6 now. He thinks at lunchtime, he might be able to 7 get some medicine and be okay. I might keep my 8 eye on him. I'm a little concerned because I 9 guess Judy said she saw him on the elevator, too, 10 and he was talking to himself, acting a little 11 off, so I'm not sure exactly. But I'll keep my 12 eye on him. He said he's okay until lunch. 13 I didn't talk to him, that's through a 14 deputy who says he said he's okay through lunch, 15 but we'll keep an eye on him and see exactly 16 what's going on with him. And at lunchtime we'll 17 have a better -- I was going to, after this 18 witness, go ahead and take an early lunch. 19 MR. CHEW: I think that makes sense, 20 Your Honor, because we have some issues. We have 21 almost a hundred percent agreement on the 22 recordings, but I think we could use the time to</p>
<p style="text-align: right;">1552</p> <p>1 to the deputy, okay? All right. Thank you. 2 You're excused for 15 minutes. 3 (Whereupon, the jury exited the 4 courtroom and the following proceedings took 5 place.) 6 THE COURT: All right. Mr. Wyatt, 7 since you're still in the middle of your 8 testimony, you can't discuss the case or your 9 testimony with the attorneys or with Mr. Depp at 10 this time, okay? All right. Thank you. Let's 11 just come back at let's make it 11:20, okay? 12 We'll come back at 11:20. 13 MR. CHEW: Thank you, Your Honor. 14 THE BAILIFF: All rise. 15 (Recess taken from 11:01 a.m. to 16 11:21 a.m.) 17 THE BAILIFF: All rise. Please be 18 seated and come to order. 19 THE COURT: If I could have you 20 approach the bench just for a moment. 21 (Sidebar.) 22 THE COURT: Okay. So juror -- we'll</p>	<p style="text-align: right;">1554</p> <p>1 kind of finish that up. 2 THE COURT: Okay. Sure. So we'll send 3 them to lunch after this witness, and we'll 4 continue for a little while so we can take care of 5 some things, okay? Is that good? 6 MR. CHEW: Yeah. Thank you, Your 7 Honor. 8 THE COURT: Okay. 9 MS. BREDEHOFT: Thank you, Your Honor. 10 (Open court.) 11 THE COURT: All right. We're ready for 12 the jury. 13 (Whereupon, the jury entered the 14 courtroom and the following proceedings took 15 place.) 16 THE COURT: All right. 17 Cross-examination. 18 MS. BREDEHOFT: Thank you, Your Honor. 19 EXAMINATION BY COUNSEL FOR THE DEFENDANT AND 20 COUNTERCLAIM PLAINTIFF 21 BY MS. BREDEHOFT: 22 Q Now, Mr. Wyatt, you testified that</p>

1555	1 you've been a sound technician for pretty much 2 most of your career, right? 3 A Yes. 4 Q Okay. And let's go to that Marlon 5 Brando. He used an earpiece for his lines to be 6 fed to him, correct, at that time? 7 A Yes. 8 Q And when was that? When was The Brave 9 filmed? 10 A Mid '90s. 11 Q Okay. And so ever since then, Mr. Depp 12 has thought it was a good idea and has used an 13 earpiece, correct? 14 A He has used an earpiece, yes. 15 Q Okay. And you're the person who 16 controls what goes into his earpiece -- 17 A Yes. 18 Q -- is that correct? Okay. 19 So it could be music, it could be 20 lines? 21 A Yes. 22 Q It could be anything, right?	1557	1 MR. CHEW: Lack of foundation. 2 MS. BREDEHOFT: I didn't hear his 3 answer. 4 THE COURT: I'll allow it. Go ahead. 5 A I see it. It says August 2002. 6 Q Okay. Let's turn to page 16, actually, 7 the one before that. Oh, it's two before that, I 8 think. There we go. 9 Do you see where it says "Location 10 Assistance"? 11 A Yes. 12 Q Okay. And if you go down, it has your 13 name specifically on there. Does it not say 14 "Keenan Wyatt"? 15 A Yes. 16 Q And this particular one, it has Sam 17 Sarkar and Keenan Wyatt; do you see that? 18 A Yes. 19 Q But eventually it just became Keenan 20 Wyatt in all the contracts, right? 21 A I do not know. I don't know. 22 Q Okay. And then as part of this, in
1556	1 A Yes. 2 Q Okay. And you have been his sound 3 technician since the 1990s all the way up through 4 at least 2016, correct? 5 A There's been a couple of us, yes. 6 Q Okay. But you actually have been on 7 almost all of his movies haven't you? 8 A Been on most of them, not all of them. 9 Q Okay. And in fact, not only are you 10 his sound technician, but you are named in his 11 contracts as his sound technician, correct? 12 A I don't know that. 13 Q Okay. Well, let's pull up 14 Exhibit Number -- let's go to 633. 15 I'm going to show you what has been 16 marked as Defendant's Exhibit 633, and it's the 17 contract for Pirates of the Caribbean from 18 August 2022 [sic]. 19 Do you see that? 20 MR. CHEW: Objection. Lack of 21 foundation. 22 MS. BREDEHOFT: I'm sorry.	1558	1 each of Mr. Depp's contracts, he had what you were 2 going to get paid, correct? 3 A I don't know what's in his contract. 4 Q Okay. Well, on this one it was 14.28 5 per hour, correct? 6 MR. CHEW: Lack of foundation, Your 7 Honor. 8 THE COURT: All right. Well, he 9 doesn't know this contract if you want to frame it 10 as a different question. 11 Q Well, you, on every one of his 12 contracts, had an hourly rate and a guarantee at 13 of at least 60 hours a week, right? 14 MR. CHEW: Calls for speculation. Lack 15 of foundation. 16 MS. BREDEHOFT: Surely he has to know 17 how he was getting paid. 18 THE COURT: You can ask him that 19 question. 20 Q Do you know how you were getting paid 21 on each of these films? 22 A Yes. I get paid through a payroll

1559	<p>1 company from the production companies. 2 Q Okay. And these were all negotiated by 3 Mr. Depp, correct? 4 A No. 5 Q Or his company? 6 A I'm paid by the -- union sets the rate 7 for me. 8 Q Right. But you're aware that Mr. Depp 9 has negotiated and then put you in his contracts, 10 right? 11 UNKNOWN SPEAKER: Lack of foundation. 12 Calls for speculation. 13 THE COURT: I'll allow that answer if 14 he can answer it. 15 A I'm sorry. 16 THE COURT: Do you want to ask the 17 question again? 18 Q You're aware that Mr. Depp has put you 19 into each of his contracts including how much you 20 get paid and all of your perks, right? 21 A I see it here, but when I'm hired by a 22 production company, I get paid by the production</p>	1561	<p>1 Q Okay. So is it your testimony that you 2 didn't know that you were named specifically and 3 the terms of your compensation and your benefits 4 were in every single one of Mr. Depp's contracts? 5 MR. CHEW: Objection. Asked and 6 answered several times, Your Honor. 7 MS. BREDEHOFT: It has not, and I -- 8 THE COURT: I'll allow it this time. 9 A I did not know it was in the contract. 10 THE COURT: Okay. Next question. 11 Q Okay. I'm going to -- let's go take a 12 look, real quick, I'm going to flip over to 855. 13 And this is a contract, December 4, 2008, with 14 Paramount Pictures for Rango. 15 Do you recall that? 16 A Yes. 17 Q You were his sound technician there, 18 correct? 19 A Yes. 20 Q And if we turn to page 12, which is the 21 second one, if you look down there, your name is 22 right there. You're designated as sound</p>
1560	<p>1 company at my, you know, rate for the job that I'm 2 doing. That's not the rate I make when I'm 3 working on a production. 4 Q Okay. All right. Well, let's stay on 5 this one just for a minute, and then we'll take a 6 look at the couple more because you ended up with 7 a lot higher rate pretty soon. But you also had 8 your airfare paid for, correct, for travel? 9 A Yes. 10 Q You also were put up in the same hotel 11 as Mr. Depp if he was in a hotel, correct? 12 A Not necessarily all the time. 13 Q Right. And if he was in a house, then 14 you got a comparable hotel close by, right? 15 A I got a place to stay wherever we were 16 filming, yes. 17 Q And it was comparable? 18 A Comparable to Johnny's? No. 19 Q It was a positive? It was a nice 20 hotel, wasn't it? 21 A Yeah. I mean, productions, we usually 22 stayed at nice hotels.</p>	1562	<p>1 technician, correct? Do you see that? 2 A Yes. 3 Q All right. And then let's flip to the 4 next page. And that has 3500 per week, correct? 5 MR. CHEW: Lack of foundation. 6 Q Do you remember getting \$3,500 a week? 7 A I get whatever the weekly rate is for 8 the union position that I'm doing. I don't 9 know -- at this time, I don't recall what the rate 10 was. I don't know if that's what I got or not. 11 But I got what the union set as my minimum rate. 12 Q And again, you didn't know that 13 Mr. Depp negotiated this into his contract? 14 A No. 15 Q Okay. And then if we go down a little 16 bit further here, it has you round trip class -- 17 coach class transportation. 18 Do you see that? 19 A Yes. 20 Q And then it has hotel accommodations 21 and per diem on the same basis as the crew of the 22 picture in this one, correct?</p>

1563	1 A Yes. Well, we were in -- Rango was in 2 Los Angeles, so none of that would have taken 3 place. 4 Q Right. So it was a lot easier. 5 A Yeah. 6 Q Then let's jump to Plaintiff's 7 Exhibit 842, and this is Pirates of the Caribbean, 8 July 2014, this would be for 5, right? 9 MR. CHEW: Your Honor, lack of 10 foundation. These are contracts to which 11 Mr. Wyatt was not a party. 12 MS. BREDEHOFT: Your Honor, it's not 13 offered to prove the truth of the contract. 14 MR. CHEW: Then what is it offered for? 15 MS. BREDEHOFT: All right. 16 Q Well, let me ask it this way: For 17 Pirates 5, you were -- what was your hotel 18 accommodations? 19 A I was staying in a condominium that the 20 rest of the crew was staying in. 21 Q Okay. And how much were you getting 22 paid on Pirates 5?	1565	1 Q Okay. And, in fact, he wasn't showing 2 up before Amber ever got to Australia; isn't that 3 correct? 4 A I don't know that. 5 Q Do you recall him going on a binge with 6 Marilyn Manson for a few days? 7 A No, I -- 8 MR. CHEW: Objection. Lack of 9 foundation. 10 THE COURT: I'll allow it. 11 Q You don't recall that? I'm sorry. Do 12 you recall? 13 A No, I don't recall. 14 Q You don't recall one way or the other? 15 Or you just -- 16 A No. I didn't visit Johnny when they 17 were in Australia. I don't know. 18 Q Okay. So you had no -- 19 A He had a house. I had a condominium in 20 town. 21 Q So you don't know what was causing 22 Johnny to be late or whether he was taking a lot
1564	1 A Whatever the union minimum was for my 2 job. 3 Q Do you have any idea what it was? 4 A No. I don't recall. 5 Q Okay. 6 A I'd have to look it up. 7 Q And were you aware that your 8 compensation and benefits were in Mr. Depp's 9 Pirates contract? 10 A No, I did not. 11 Q All right. Now, let's go to Pirates 5 12 in particular. I think you testified that 13 Mr. Depp was occasionally late, late a lot to the 14 set? 15 A I don't recall. I mean, he was late, 16 yes. 17 Q There are days he didn't show up at 18 all, weren't there? 19 A Could have been. I don't recall. 20 Q And there were days that he didn't show 21 up for six, seven hours, correct? 22 A Yes.	1566	1 of alcohol and drugs? 2 A No. 3 Q Is that fair to say? 4 A Yes. 5 Q Okay. And you said that you observed 6 Johnny Depp talking with Sean Bailey after he came 7 back. Let's go to that. You said there was a 8 two- to three-week delay. In fact, it was closer 9 to five to six weeks, wasn't it? 10 A I don't recall what it was. 11 Q It's significant when the entire crew 12 has to stop for that period of time, isn't it? 13 UNKNOWN SPEAKER: Objection. To 14 Ms. Bredehoff's testimony. 15 THE COURT: All right. I'll sustain 16 the objection. Ask a question. 17 Q Pretty significant, isn't it, when 18 there's a delay? 19 A It's significant. I don't think the 20 film completely shut down for all of that. They 21 continued to shoot what they could. 22 Q How many of the crew members were

<p style="text-align: right;">1567</p> <p>1 impacted by Johnny not being able to be there 2 after he cut off -- after the finger was cut off? 3 A Well, there was some of the crew, I'm 4 sure, still kept working and filming, filming 5 other scenes without Johnny's character in it. 6 Q Do you know how many were impacted? 7 A No, I don't. 8 Q Do you know how much Disney was 9 impacted? 10 A No, I don't. 11 Q Okay. So now you say when he came 12 back, he had collaborated with Sean Bailey, right? 13 A Yes. 14 Q They were talking about how they were 15 going to get together on something, right? 16 A Yes. 17 Q Did Johnny do anything with Sean Bailey 18 for the rest of 2015? 19 A I don't know about that year. But I 20 know that they, you know, they talked about 21 collaborating and doing something. Sean and 22 Johnny had worked out Johnny working at the --</p> <p style="text-align: right;">1568</p> <p>1 Q Mr. Wyatt, if you could just answer my 2 question. 3 MR. CHEW: Your Honor, may the witness 4 please -- she asked the question. He should be -- 5 MS. BREDEHOFT: I asked, "Did he 6 collaborate in 2015?" 7 MR. CHEW: Your Honor, may he be able 8 to, please, finish his answer? 9 THE COURT: Yes. Let him finish the 10 question -- the answer, sorry. Go ahead. 11 A Johnny and Sean put together Johnny 12 dressing up as Captain Jack and addressing the 13 crowd at the Pirates of the Caribbean ride. 14 MS. BREDEHOFT: Your Honor, I'm going 15 to move to strike and ask you to ask that to be 16 stricken. That is not responsive to my question. 17 MR. CHEW: Your Honor, she asked him 18 the question -- 19 THE COURT: That's not the question she 20 asked. I mean, do you want to ask him your 21 question again? 22 Q Yes. Did Mr. Bailey collaborate on any</p>	<p style="text-align: right;">1569</p> <p>1 projects with Mr. Depp in 2015 after Pirates 5? 2 A The one I just said, the project of 3 that was a promotional project for -- 4 Q Was it a film? 5 A Pirates of the Caribbean. 6 Was it filmed? 7 Q Yeah. 8 A I think it was videotaped or filmed, 9 yes. 10 Q Was it a feature film that Disney made 11 money on? 12 A No, it wasn't a feature film. 13 Q All right. Let's go to 2016. Did Sean 14 Bailey collaborate on any film project -- 15 A I don't know. 16 Q -- with Mr. Depp? 17 A I don't know. 18 Q Let's go to 2017. 19 A I don't know. 20 Q Did Mr. Bailey collaborate with 21 Mr. Depp on any film project? 22 A I don't know the timing of the other</p> <p style="text-align: right;">1570</p> <p>1 things. No, I don't know if he did or not. 2 Q Let's go to 2018. Did Mr. Bailey 3 collaborate at all with Mr. Depp in 2018? 4 A I don't know. 5 Q Were you aware that Mr. Bailey said 6 that he -- that Mr. Depp was "out" for Pirates 6 7 in October of 2018? 8 MR. CHEW: Objection. Hearsay. 9 THE COURT: All right. I'll sustain as 10 to hearsay. 11 Q Okay. Let's pull up Plaintiff's 12 Exhibit 115. 13 THE COURT: You said Plaintiff's 115? 14 MS. BREDEHOFT: Plaintiff's 115. Oh, 15 defendant's, I'm sorry. 16 THE COURT: Defendant's. 17 Q Now, this is an article in October of 18 2018. 19 Do you recall seeing this article? 20 A No. 21 Q You never saw it? 22 A I don't read the --</p>
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1571	1 Q Okay. Okay. 2 A I don't read these stories and stuff 3 like that. 4 Q So would it be fair to say that you 5 don't know whether Mr. Bailey had determined that 6 Mr. Depp would not be in Pirates 6 as of October 7 of 2018? 8 A I don't. I don't know. Especially 9 based on this, I don't. I don't believe this 10 stuff anyway. 11 Q Okay. 12 MS. BREDEHOFT: We can take that down. 13 Thank you. 14 Q All right. Let's talk about your visit 15 with Vanessa and the kids and Mr. Depp. You 16 indicated you went on some vacations with them, 17 correct? 18 A Yes. 19 Q They were together 14 years? 20 A Yes. 21 Q How many vacations did you go on with 22 them?	1573	1 abused Vanessa Paradis, correct? 2 A None that I ever saw. 3 Q Right. But you have no knowledge one 4 way -- you don't know, do you? 5 A None that I saw. 6 Q Right. Right. You don't know what 7 went on in their marriage, in their relationship, 8 when you weren't there, correct? 9 A Not when I wasn't there, no. 10 Q Okay. And they split up, right? 11 A Yes. 12 Q Do you know why they split up? 13 A No, I do not. 14 Q All right. You don't know if Mr. Depp 15 yelled and raised his voice at Vanessa Paradis on 16 a daily basis when you weren't around, do you? 17 A Not when I wasn't around, I don't, no. 18 Q All right. And then you were asked at 19 the very end by Mr. Chew whether you had ever 20 heard of anyone accusing Mr. Depp of violence, and 21 you said you'd never heard of anyone accusing 22 Mr. Depp of violence.
1572	1 A Several. I don't know. I don't know 2 all of them. 3 Q Two, three? 4 A Probably more than that. 5 Q Four? 6 A Probably more than that. I don't know. 7 Half a dozen, dozen. 8 Q Okay. We get to six? Okay. 9 A Yeah. 10 Q Six to 12? 11 A Right. 12 Q And these are all vacations, right? 13 A After filming, yes. 14 Q Okay. So these are times where 15 everybody's having fun, relaxing. It's not your 16 regular -- 17 A Yes. 18 Q -- day-to-day grind that everybody goes 19 through, right? 20 A Yes. 21 Q Okay. Now, you have no personal 22 knowledge of whether Mr. Depp ever physically	1574	1 Do you recall that? 2 A Yeah. 3 Q Have you ever heard of Greg Brooks? 4 A Doesn't -- I don't know. 5 Q He's a manager on the set from City of 6 Lies -- 7 A Okay. 8 Q -- who has filed a lawsuit against 9 Mr. Depp for punching him. 10 MR. CHEW: Your Honor, lack of 11 foundation. And object to -- 12 MS. BREDEHOFT: That's fair game. Your 13 Honor. 14 MR. CHEW: -- Ms. Bredehoff's 15 speechifying. 16 THE COURT: I'll allow it. Go ahead. 17 A I don't. I mean, I don't know what 18 happened. I've never seen. 19 Q Have you ever heard of that? 20 A I've never seen him be violent to 21 anybody. 22 Q But you testified you never heard of

<p>1575</p> <p>1 that, so have you ever heard of Greg Brooks 2 accusing Mr. Depp of punching him on the set of 3 City of Lies? 4 A Yeah. I mean, I've heard it. I don't 5 know any basis of it, though. 6 Q So it's not true that you've never 7 heard of anyone accusing Mr. Depp of violence, is 8 it? 9 A I suppose not. 10 Q Okay. And you don't know whether 11 Mr. Depp committed any domestic abuse or violence 12 on any of the women in his relationships, do you? 13 A I never witnessed it. 14 Q Right. You don't have personal 15 knowledge, though, do you? 16 A Only what I've witnessed, and I've 17 never witnessed it. 18 Q Right. You don't know what went on 19 behind closed doors with any of them? 20 A I do not. 21 Q Okay. Now, let's go to the Boston 22 plane. This was in May of 2014. So you were in</p>	<p>1577</p> <p>1 A Not that I recall. 2 Q Do you know whether he took any drugs 3 before he got in the car? 4 A I wasn't with him before he got in the 5 car. 6 Q All right. And I think you testified 7 in response to the question that you didn't think 8 that he was intoxicated or high? 9 A No. I mean, he seemed like Johnny. 10 Q Did he take any Red Bulls that you saw? 11 A Took any what? 12 Q Red Bulls. 13 A Red Bulls? I don't know. There was 14 occasion where he would drink Red Bulls. I don't 15 know if that was the same time or not. 16 Q All right. Was he drinking vodka with 17 any Red Bulls? 18 A I don't know. 19 Q Was he drinking whiskey? 20 A I don't know. 21 Q Was he taking cocaine? 22 A I don't remember seeing it, no.</p>
<p>1576</p> <p>1 the car with Mr. Depp before he got on the plane? 2 A Yes. 3 Q How long was he in that car? 4 A How long were we in the car? 5 Q Yes. 6 A I don't recall. 45 minutes, an hour, 7 maybe. I don't recall. 8 Q You sat on the tarmac for quite some 9 time before getting on the plane, didn't you? 10 A I don't recall. 11 Q You don't recall that? 12 A No. 13 Q Okay. And is it your testimony that 14 Mr. Depp wasn't drinking anything while he was in 15 the car? 16 A Not in the car, no. 17 Q Had Mr. Depp been drinking anything 18 before he got into the car? 19 A I don't know. I wasn't with him 20 before. 21 Q Is it your testimony that Mr. Depp 22 didn't take any drugs while he was in the car?</p>	<p>1578</p> <p>1 Q Did you see any powders? 2 A No. 3 Q So you get on the airplane, and it's 4 your testimony that Ms. Heard had a bad tone of 5 voice with Mr. Depp; is that correct? 6 A She had a bad tone of voice with me. 7 Q Okay. In fact, wasn't Mr. Depp saying 8 pretty horrible things to Ms. Heard? 9 A I don't recall that. 10 Q Like "Get fucked on set. Get fucked 11 with fucking James fucking Franco," did you hear 12 that? 13 A I don't recall. 14 Q Did you hear him say, "At least you 15 fucking liked it"? 16 A No. 17 Q Did you hear him say, "I bet you 18 slipped a tongue in there and you liked it"? 19 A No. 20 Q Did you hear him say -- make references 21 to Amber's pussy and asking her if her pussy was 22 wet?</p>

1579	1 MR. CHEW: Your Honor, lack of 2 foundation. Harassment. 3 Q Did you hear any of that? 4 A No. Not that I recall. 5 THE COURT: I'll overrule the 6 objection. That's fine. Next question. 7 Q Now, you shared an oxygen tank with 8 Mr. Depp on that Boston plane, didn't you? 9 A No. 10 Q You don't recall Mr. Depp insisting 11 that the flight attendant give him an oxygen tank 12 and the two of you used it? 13 A No. 14 Q Okay. Do you recall Mr. Depp drinking 15 champagne on the plane? 16 A I don't know what he was drinking. I'm 17 sure I was having wine. He could have been having 18 champagne. 19 Q Do you remember him drinking a couple 20 bottles of champagne? 21 A I don't know how much. 22 Q And it's your testimony that Mr. Depp	1581	1 (Sidebar.) 2 THE COURT: 245. 3 MS. BREDEHOFT: This is -- I know. I 4 needed my glasses for this. 245 has no objection. 5 THE COURT: 245. 6 MR. CHEW: It's improper impeachment. 7 It's not to Mr. Wyatt. 8 MS. BREDEHOFT: First of all, it's 9 admitted, so it can be published. But this is 10 Mr. Depp talking about what he drank and what he 11 took in drugs -- 12 MR. CHEW: Your Honor, it's hearsay. 13 MS. BREDEHOFT: -- before and at that 14 time. 15 MR. CHEW: Your Honor, it's hearsay and 16 it's prejudicial. 17 MS. BREDEHOFT: We're admitting it 18 here. 19 THE COURT: Who's it from, though? 20 MS. BREDEHOFT: It's from Depp to Paul 21 Bettany. 22 THE COURT: To who?
1580	1 didn't kick Amber? 2 A I didn't see anything like that. 3 Q Okay. Did you see Mr. Depp go to the 4 back of the plane and pass out and moan loudly? 5 A I don't recall that. 6 Q You don't recall that either? 7 A No. 8 Q Okay. 9 MS. BREDEHOFT: Can we pull up 10 Defendant's Exhibit 245, please. And, Your Honor, 11 I show no objection to it in the filings. So I'm 12 going to move the admission of it, and I'm going 13 to ask it to be published. 14 THE COURT: Any objection to 245? 15 MR. CHEW: Yes, Your Honor. It's 16 improper impeachment. It's not to him. 17 THE COURT: All right. If you want to 18 approach, we'll see what's your objections. Do 19 you have your lists of objections from your 20 exhibits? 21 MS. BREDEHOFT: I do. I have them 22 right here.	1582	1 MS. BREDEHOFT: To Paul Bettany. 2 MR. CHEW: No. It's not to him. 3 THE COURT: No. Then it can't come in. 4 Just because they didn't object to it doesn't mean 5 it automatically comes in at trial. You're trying 6 to use it for impeachment. Obviously they 7 can't -- they don't know that's what you're trying 8 to use it for at the time, so there are still 9 hearsay objections and impeachment objections that 10 come up during trial. 11 And right now, he's not even party to 12 this conversation, so I'm not going to allow it. 13 Okay? 14 MS. BREDEHOFT: Okay. Thank you, Your 15 Honor. 16 MR. CHEW: I think she should be 17 instructed to move on. 18 THE COURT: Excuse me? 19 MR. CHEW: She should be instructed to 20 move on to another -- 21 MS. BREDEHOFT: No. I'm going to ask 22 questions. I just can't use the document.

1583	<p>1 THE COURT: Well, you're not going to 2 use it -- you're not going to ask questions about 3 this text, though. 4 MS. BREDEHOFT: I can't make reference 5 to the text -- 6 MR. CHEW: No. 7 MS. BREDEHOFT: -- because of Your 8 Honor's ruling, but I'm going to ask him 9 additional questions. But I'm not going to put it 10 in the text. 11 THE COURT: I just want to make sure 12 we're on the same page. Not involving the words 13 on this text, correct? 14 MS. BREDEHOFT: Correct. 15 MR. CHEW: That's what I wanted to make 16 sure. 17 THE COURT: Okay. 18 (Open court.) 19 BY MS. BREDEHOFT: 20 Q Mr. Wyatt, are you aware that 21 Mr. Deuters apologized to Amber for Mr. Depp's 22 conduct afterward?</p>	1585	<p>1 A No. 2 Q When you say you don't recall, as 3 you're sitting here today under oath, you honestly 4 can't remember if Mr. Depp was passed out when you 5 left the plane? 6 MR. CHEW: Asked and answered, Your 7 Honor. 8 THE COURT: All right. I'll allow it 9 this one time. Go ahead. You can answer, sir. 10 A There was lots of plane flights. I 11 mean, the only reason I remember this one was 12 because Amber yelled at me on that flight. 13 Q Do you remember my question? 14 A I didn't -- I don't recall. 15 Q All right. 16 A I mean, I could have gotten off the 17 plane and just left. I don't know. 18 Q And Mr. Depp could have kicked Amber on 19 that plane, right? 20 MR. CHEW: Your Honor, asked and 21 answered. 22 A Not that I saw.</p>
1584	<p>1 MR. CHEW: Lack of foundation, hearsay, 2 Your Honor. 3 THE COURT: I'll sustain the objection. 4 Next question. 5 MS. BREDEHOFT: Okay. 6 Q Where did you go -- were you with 7 Mr. Depp -- 8 MR. CHEW: Excuse me, Your Honor. 9 Q -- after he left the plane? 10 MR. CHEW: I apologize. May we take 11 this down? 12 THE COURT: It's just on the witness, 13 but, yes. 14 MR. CHEW: Thank you, Your Honor. 15 THE COURT: Okay. Go ahead. 16 Q Did you leave the plane with Mr. Depp? 17 A I mean, I got off the plane at the same 18 time. I'm assuming I went to my own home. 19 Q Okay. And what was Mr. Depp's state? 20 A I don't recall. 21 Q You don't recall if he was passed out 22 or not?</p>	1586	<p>1 Q Okay. And he could have passed out? 2 A Not that I recall. 3 Q Okay. How many times were you with 4 Amber and Mr. Depp together? 5 A I have no idea. No idea. 6 Q Well, what would the circumstances have 7 been? 8 A Invited over for something or other, 9 or, you know, Johnny and I may have been recording 10 some music or something and she was there. I 11 don't know. At work. I don't know. 12 Q Now, you had a very close, personal 13 relationship with Christi Dembrowski, didn't you? 14 A We're friends, yes. 15 Q And you were more than friends for 16 quite a few years, wouldn't you say? 17 MR. CHEW: Your Honor, relevance. May 18 we approach? 19 MS. BREDEHOFT: It's impeachment. 20 THE COURT: Approach, please. 21 (Sidebar.) 22 THE COURT: All right. What's the</p>

1587	1 problem? 2 MR. CHEW: She's just wanting to go 3 into the gutter again and try to intimate -- 4 THE COURT: I'm not sure -- 5 MS. BREDEHOFT: He's biased. He had an 6 affair with her for years. 7 MR. CHEW: He didn't. That's a lie, 8 number one. 9 THE COURT: I'm not going there. I'm 10 not. I'm going to sustain that objection. That's 11 more of a sideshow than we're going to. She's not 12 on trial here, okay? 13 MS. BREDEHOFT: Correct. 14 THE COURT: All right. 15 (Open court.) 16 BY MS. BREDEHOFT: 17 Q Now, you testified that the wedding 18 that you went to, the one in Los Angeles, seemed 19 to be a little rushed? 20 A Yes. 21 Q How long were they engaged? 22 A I don't know.	1589	1 A Yeah. 2 Q Okay. 3 A We were starting a film or ending a 4 film or whatever, yes. 5 Q Okay. And when did you leave for 6 Pirates 5? 7 A I don't recall when. 8 Q What was he filming right before 9 Pirates 5? 10 A I don't recall. 11 Q Okay. So after they did the 12 Los Angeles wedding, they went to the Bahamas, 13 correct? 14 A I don't remember the time difference. 15 Q But you didn't go to that wedding? 16 A No. 17 Q Do you know how many people did? 18 A No. 19 Q Do you know how much organization was 20 involved in getting that wedding together in the 21 Bahamas? 22 A No, I don't know.
1588	1 Q Could it have been a pretty substantial 2 period of time? 3 A I don't know. 4 Q Okay. So, when you say "rushed..." 5 A We didn't know a wedding was going to 6 happen. 7 Q Well, and you said you were at the 8 offices of -- at Infinitum; is that right? When 9 you say "We didn't know any wedding was going to 10 happen," who's "we"? 11 A Several of the people at the wedding 12 didn't know it was going to happen. 13 Q Okay. Okay. Now, did you know what 14 Amber's film schedule was? 15 A No. 16 Q Did you know whether she was out of 17 town, coming back in, and leaving again? 18 A I did not know. 19 Q Did you know what Johnny's film 20 schedule was? 21 A I probably knew we were off. 22 Q Because you were his sound technician?	1590	1 Q Do you know whether -- do you know -- 2 well, okay. I guess you don't know. So I guess I 3 shouldn't ask you then. 4 So as a practical matter, you don't 5 know about any of the communications between 6 Mr. Depp and Ms. Heard for when they wanted the 7 wedding to take place, correct? 8 A Correct. 9 Q Okay. 10 MS. BREDEHOFT: Thank you. I have no 11 further questions. 12 THE COURT: Okay. 13 MR. CHEW: Your Honor, I just have a 14 few. 15 THE COURT: Sure. Redirect. 16 EXAMINATION BY COUNSEL FOR THE PLAINTIFF AND 17 COUNTERCLAIM DEFENDANT 18 BY MR. CHEW: 19 Q Mr. Wyatt, you testified earlier that 20 you worked with Mr. Depp as his sound technician 21 on more than ten feature films; is that correct? 22 A Correct.

<p style="text-align: right;">1591</p> <p>1 Q Have you ever worked on feature films, 2 as a sound technician or in any other capacity, on 3 films without Mr. Depp? 4 A Yes, I have. 5 Q On those instances and those films not 6 involving Mr. Depp, were your travel costs 7 covered? 8 A Yes, they are. 9 Q Were your hotel costs covered? 10 A Yes, they are. 11 Q Was your airfare covered? 12 A Yes. 13 Q Were those arrangements handled in any 14 way different from the films on which you worked 15 with Mr. Depp? 16 A No. 17 Q What was your understanding of why 18 Mr. Depp was late on the set to Pirates 5? 19 MS. BREDEHOFT: Objection, Your Honor. 20 Calls for foundation. Key -- 21 THE COURT: Use your microphone. 22 MS. BREDEHOFT: Oh, sorry. Objection,</p>	<p style="text-align: right;">1592</p> <p>1 Your Honor. He's already testified he doesn't 2 know and he wasn't there with him, and he doesn't 3 know. 4 MR. CHEW: Directly related to the 5 cross. 6 THE COURT: I'll allow it. Go ahead. 7 A Sorry. Say it again. 8 Q What was your understanding of why 9 Mr. Depp was late occasionally on the set of 10 Pirates 5? 11 A My understanding was he was having 12 arguments with Amber. 13 Q And the wedding that you attended, or 14 the ceremony in Los Angeles, that was right before 15 Mr. Depp was to start filming Pirates 5, correct? 16 A Yes. 17 Q Is that one of the reasons Amber wanted 18 to be married right then? 19 MS. BREDEHOFT: Objection. Foundation. 20 Hearsay. 21 THE COURT: All right. Foundation. 22 I'll sustain as to foundation.</p>	<p style="text-align: right;">1593</p> <p>1 Q Mr. Wyatt, you've known Mr. Depp for a 2 long time, correct? 3 A Yes. 4 Q And you've worked with him for a long 5 time? 6 A Yes. 7 Q Has any woman other than Ms. Heard ever 8 accused him of raising a hand to her? 9 MS. BREDEHOFT: Objection, Your Honor. 10 He's already asked that beforehand, and I went 11 into cross with him. 12 THE COURT: Asked and answered. 13 Sustain the objection. 14 MR. CHEW: Thank you, Your Honor. 15 Thank you, Mr. Wyatt, and thank you, Your Honor. 16 Nothing further. 17 THE COURT: All right. Is this witness 18 subject to recall? 19 MR. CHEW: Yes, Your Honor. 20 THE COURT: All right. So since you're 21 subject to recall, you cannot discuss your 22 testimony with anybody. And do not watch anything</p>	<p style="text-align: right;">1594</p> <p>1 in the news media at this time, and then you may 2 be recalled at the later date, okay? 3 THE WITNESS: Okay. 4 THE COURT: All right. Thank you, sir. 5 You have a good day. You're excused for today. 6 Ladies and gentlemen, we have a few 7 housekeeping matters to take care of. And also, I 8 know the cafeteria was a little rough yesterday, 9 so I'm going to go ahead and give you an extended 10 lunch today until 2:00. So just do not discuss 11 the case with anybody and don't do any outside 12 research, and we'll see you back here at 2:00 p.m. 13 Okay. If you just go with Deputy Halusa. 14 (Whereupon, the jury exited the 15 courtroom and the following proceedings took 16 place.) 17 THE COURT: All right. Okay. You said 18 you had some housekeeping matters to take care of. 19 MS. BREDEHOFT: I'm not aware of any. 20 MR. CHEW: We'd like to speak with you 21 about some of the videos if you have a moment 22 before the lunch.</p>
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<p>1 MS. BREDEHOFT: I'm happy to chat with 2 them, but I -- 3 THE COURT: Okay. So you don't need me 4 for that? Oh, okay. 5 MR. CHEW: Oh, yes, Your Honor. I 6 apologize. 7 THE COURT: Oh, okay. I thought you 8 needed me for that. 9 MS. BREDEHOFT: So you're getting an 10 extended lunch. 11 THE COURT: So I can get an extended 12 lunch. Okay. Well, what I'm going to do, just to 13 let you know -- actually if you approach the 14 bench. 15 (Sidebar.) 16 THE COURT: With Juror 4, I'm going 17 to -- we have CSB in the building, you know, for 18 mental health services, so I'm going to have one 19 of them come up and just not release him for lunch 20 yet and talk with him, and see exactly if he is 21 having a mental health issue. 22 MS. BREDEHOFT: I think that's a good</p>	<p>1 MS. VASQUEZ: Both sides do. But we 2 believe, similar to the way Your Honor has been 3 ruling on the text message, only the portions of 4 the transcripts that are displayed -- 5 THE COURT: Right. 6 MS. VASQUEZ: -- should be submitted to 7 the jury as either an aid, if Your Honor would 8 prefer, or admitted into evidence. 9 THE COURT: Okay. 10 MS. VASQUEZ: Ms. Heard's counsel is 11 insisting that the entire transcript should be 12 provided to the jury, and we disagree with that. 13 THE COURT: As far as when it comes to 14 video coverage and transcripts, they can have the 15 transcripts as aid; they're not evidence. 16 MS. VASQUEZ: Right. 17 THE COURT: Okay? So they can have 18 them as an aid as you're watching the video. 19 MS. BREDEHOFT: Audio. And we're 20 mostly talking about audio here, audio recordings. 21 THE COURT: Audio. It can be 22 assistance when they hear the audio, but the</p>
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<p>1 idea. 2 MR. CHEW: Thank you, Your Honor. 3 THE COURT: Okay? And so we're going 4 to see where we are, and we can go -- update from 5 there. 6 I'm sorry about the extended lunch. I 7 thought we had other things to do, but if that 8 works out -- 9 MS. VASQUEZ: Well, we'd appreciate it, 10 Your Honor, because we've met and conferred and 11 started to on the recordings. 12 THE COURT: Okay. Good. 13 MS. VASQUEZ: And we have an agreement 14 that both sides can use the other's voices -- 15 THE COURT: During Mr. Depp's? 16 MS. VASQUEZ: Yeah, uh-huh. 17 THE COURT: I gotcha. 18 MS. VASQUEZ: The only thing, we're 19 still ironing out whether we believe, Mr. Depp 20 believes, that only portions of -- we have 21 transcriptions of the recordings. 22 THE COURT: Okay.</p>	<p>1 transcripts, themselves, don't come into evidence. 2 The evidence is the audio recording. 3 MS. BREDEHOFT: I think the reason that 4 we've got the transcripts, Your Honor, there is 5 one audio recording that's over five hours, and 6 it's... 7 THE COURT: It doesn't come into 8 evidence unless the audio comes into evidence. I 9 usually don't let transcripts into the jury, but 10 I'll let them -- 11 MS. BREDEHOFT: We just wanted to do 12 that so that -- 13 THE COURT: Okay. That's fine. But if 14 you think it'll help them because maybe there's 15 hard-to-hear parts of the audio, I'll allow them 16 to -- you can pass it to them while they're 17 listening to the audio, and then once it's done, I 18 collect them back up. 19 MS. BREDEHOFT: Okay. 20 MS. VASQUEZ: And there's going to be 21 two versions, Your Honor, because we've done 22 transcriptions and they've done transcriptions.</p>

1599	1 THE COURT: Of course there is. 2 MR. CHEW: Very unreasonable. 3 THE COURT: Okay. So do you want me to 4 come back a little early so I can decide which 5 one? Or are you guys going to figure that out on 6 your own? I'm not going to give the jurors two 7 transcriptions. 8 MS. VASQUEZ: You're not going to give 9 them two? 10 THE COURT: No. The whole point is to 11 help them. 12 MS. VASQUEZ: Would it be -- 13 THE COURT: If you can't agree, then 14 I'm not going to give it to them and it's just 15 going to be on their hearing of it. 16 MS. VASQUEZ: Okay. Or would you be 17 amenable if we play a portion of the transcript, 18 that we provide our transcription, and then -- 19 THE COURT: No. We're not going to do 20 that. 21 MS. VASQUEZ: No? Okay. 22 THE COURT: No.	1601
1600	1 MS. VASQUEZ: Okay. 2 THE COURT: Okay? So it's either one 3 transcription or none -- 4 MS. VASQUEZ: Or none. 5 THE COURT: -- and it doesn't go to the 6 jury. Okay? We'll see you at 2. 7 MR. CHEW: Thank you. 8 MS. VASQUEZ: Thank you very much, Your 9 Honor. 10 THE BAILIFF: All rise. 11 (A recess was taken from 11:56 a.m. to 12 2:00 p.m.) 13 THE BAILIFF: All rise. Please be 14 seated and come to order. 15 THE COURT: Sorry, my microphone was 16 off. I'm sorry, Judy, I've got it. 17 (Whereupon, the jury entered the 18 courtroom and the following proceedings took 19 place.) 20 THE COURT: All right. I hope 21 everyone's lunch went okay, all right? Good. 22 All right. Your next witness.	1602

<p style="text-align: right;">1603</p> <p>1 So it was my responsibility, I felt, to 2 not only attempt to clear my name for the sake 3 of – well, for many reasons, but I wanted to 4 clear my children of this hard thing that they 5 were having to read about their father, which was 6 untrue. And, also, after many years of being in 7 this industry, at the time, it was probably – I'd 8 probably been in the industry 30-plus years, 9 35 years, and never had had any problems or 10 anything like that. And I had met many people 11 over the years. Many, many of the people, and had 12 the opportunity to talk to those people and to 13 even give advice to these people. And I'm not – 14 my goal is the truth. My goal is the truth 15 because it killed me that people that I had spoken 16 with, that I had met with over the years, who I – 17 who maybe were in not such a great position and 18 they needed advice, and I gave them the best 19 advice I could, all I could think of was that 20 those people would think that I was a fraud and 21 that I had lied to them. 22 And so, I had to wait for my</p>	<p style="text-align: right;">1605</p> <p>1 full for the first time. 2 Q Mr. Depp, how do you feel about the 3 intimate details of your life being aired in this 4 process? 5 A As a father, raising kids, you know, 6 when they were very, very little, it was important 7 to me, very important to me, to try to shield my 8 children, as much as possible, from looking at 9 their father or their mom, for that matter, as 10 novelties. I didn't want my children to 11 experience hoards of paparazzi. So I was always a 12 very private person. 13 So, for me to come up here and stand 14 before you, or sit before you all, and spill the 15 truth is quite exposing and it's unfortunate that 16 it's not only exposing for myself, it's exposing 17 for my family, it's exposing for Ms. Heard, it's 18 exposing for – it never had to go in this 19 direction. 20 And so, I – I can't say that I'm 21 embarrassed because I know that I'm doing the 22 right thing.</p>
<p style="text-align: right;">1604</p> <p>1 opportunity to address the charges, which were 2 criminal charges, and they just weren't true. So 3 I felt a responsibility of clearing the record as 4 the only – the only way that I could get to the 5 point where I could speak. It has really taken 6 this full six years, and it's been six years of 7 trying times. It's very strange when one day 8 you're Cinderella, so to speak, and in 9 0.6 seconds, you're Quasimodo. And I didn't 10 deserve that, nor did my children, nor did the 11 people who have believed in me for all these 12 years. I didn't want anybody – any of those 13 people to believe that I had done them wrong or 14 lied to them or that I was a fraud. 15 I am – I pride myself on honesty. I 16 pride myself on truth. Truth is the only thing 17 I'm interested in. Lies will get you nowhere, but 18 lies build upon lies and build upon lies. It's 19 too much to cover. 20 I'm obsessed with the truth and, so, 21 today is my – actually, the first opportunity 22 that I've been able to speak about this case in</p>	<p style="text-align: right;">1606</p> <p>1 Q Now, Mr. Depp, I'd like to turn, a bit, 2 to your upbringing. We heard a bit from your 3 sister, Christi, last week. But can you please 4 tell the jury, in your own words, about your 5 childhood upbringing? 6 A I had a very interesting childhood. 7 One that I felt was normal until a certain age. 8 My mother – I was born in Kentucky, 9 and then we moved – in which we moved around 10 quite a lot when I was a kid, so you were always 11 just – my mom had this – her feet were on fire 12 and she had to move, you know, so we moved 13 constantly. So you were always the new kid, and 14 that wasn't ever particularly pleasant. 15 Then we moved to Florida, 16 South Florida, when I was about seven or eight. 17 And, again, moved several, several times. 18 But my mother was quite unpredictable. 19 She was very unpredictable. She was a – she had 20 the ability to be as cruel as anyone can be with 21 all of us, so that is to say my sister Christi and 22 my brother Danny, and my sister Debbie, also my</p>

<p style="text-align: right;">1607</p> <p>1 father. So, essentially, she was – she could 2 become quite violent, and she was quite violent 3 and she was quite cruel, and she – and though 4 there was physical abuse, certainly, which could 5 be in the form of an ashtray being flung at you, 6 you know, hit you in the head or you'd get beat 7 with a high-heel shoe or a telephone or whatever's 8 handy. 9 So, in our house, there was no – we 10 were never exposed to any type of safety or 11 security. The only thing that one could do, 12 really, was to try to stay out of the line of 13 fire. I started to be able to observe. I could 14 see, I could start to see when she was about to 15 head into a situation where she was going to be 16 riled up and somebody was going to get it. 17 Generally, it was me. 18 Q Mr. Depp, you mentioned that your 19 mother could be cruel. How could she be cruel? 20 A Well, the various categories, I 21 suppose, are – well, there's physical violence, 22 of course, there's physical abuse, to which she</p>	<p style="text-align: right;">1609</p> <p>1 And Christi, my sister, knew very well 2 that that was a deep, a deep cut, psychologically, 3 emotionally. But we had to take it. I mean, you 4 just had to take the pain. 5 I was born with a very strange, it was 6 a very rare thing in my eye, as the back of the 7 lens is spherical, normally it's spherical. So 8 this eye isn't normal. This eye, I was born with 9 a more conical lens. So, my brain never learned 10 to see out of my left eye. And they noticed, when 11 I was about three, four, five -- three, four, that 12 I had a lazy eye, a wandering eye, and she would 13 call me cockeye, one-eye, anything, anything she 14 could get to, to demean, humiliate. I even had to 15 wear an eye patch on my good eye to strengthen my 16 bad eye so that it would cease to wander, it was 17 exercising the muscles of the eye. So the brain 18 never really learned to see, so I still, my vision 19 in my left eye is -- I'm legally blind in my left 20 eye. 21 So, yeah, the verbal abuse, the 22 psychological abuse, was almost worse than the</p>
<p style="text-align: right;">1608</p> <p>1 was -- that was a constant. That was just a 2 constant, you know. We were all somewhat 3 shellshocked, you know, even if she just walked 4 past, you'd shield yourself because you didn't 5 know what was going to happen. Excuse me. 6 And so, there was the physical abuse, 7 which was a constant. There was quite a lot of 8 verbal abuse. There was quite a lot of 9 name-calling, bullying, you know, making fun of 10 whatever defect, you know, one might have. My 11 brother wore glasses, so, of course, he was 12 four-eyes, and his teeth were messed up in the 13 front, so he was bucktooth as well. My sister 14 Christi, which this is such a hideous 15 psychological play, my father's parents were quite 16 refined. My mother comes from Eastern Kentucky, 17 which is where you grow up in shacks and hollers, 18 you know, and my mother despised my father's 19 parents. And my grandmother's name was Violet, 20 and every now and then, you would hear my mother 21 scream across the house "Come in here, Violet. 22 Get in here, Violet."</p>	<p style="text-align: right;">1610</p> <p>1 beatings. Because the beatings were just physical 2 pain, and the physical pain, you learn to deal 3 with, we learn to accept it, you learn to deal 4 with it. But the psychological and emotional 5 abuse, that's what kind of tore us up, I think. 6 Q What about your father? What was he 7 like? 8 A My father? My father was a very kind 9 man. In fact, my father's still alive. He's a 10 very kind man. He's a very quiet man. In fact, 11 he's very shy. Not a confrontational person in 12 any way. And when Betty Sue, my mother, would go 13 off on a tangent toward my father, and, of course, 14 in front of the kids, it was no matter to her, he 15 would -- he amazingly remained very, very stoic 16 and never -- as she was rashing him with horrible 17 things, he stood there and just looked at her 18 while she delivered the pain, and he swallowed it. 19 He took it. There was never a one moment, never a 20 moment where my father lost control and attacked 21 my mother or hit my mother, or even said a bad 22 thing to my mother. The things that I remember</p>

<p>1611</p> <p>1 was there was a couple of times that it got too 2 far, that I would see his -- I could see his eyes 3 welling up as he was staring at her and saying 4 nothing and the most that he would do is he would 5 punch a wall. I once saw him punch a wall and it 6 would shatter his hand because it wasn't drywall, 7 it was proper concrete and steel wire and rebar 8 and things of that nature. And, but, still, 9 never, never touched her. Never argued with her. 10 He remained a gentleman. To me, as a 11 five-year-old boy, I kept thinking to myself, I 12 kept wondering why, why does he take it? How does 13 he take this and why doesn't he leave her? But he 14 didn't, you know. He was able to maintain his 15 calm and his composure. He was able to maintain 16 his relationship with his children. He was a good 17 man. He's a good man. 18 Q You mentioned that you saw your father 19 punch a wall. How many times did you witness 20 that? 21 A I mean, out of -- I couldn't count the 22 amount of fights that they had. But I know that</p>	<p>1613</p> <p>1 punishment on me. 2 But, interestingly, there was one time 3 when my father, I kept telling him I didn't do 4 this. It was another incident. I kept swearing 5 to him that I did not do what Betty Sue -- what my 6 mom had said that I'd done. But he went through 7 with the punishment anyway. And then, not long 8 after, he found out that I had been telling the 9 truth, and that I hadn't done what I'd -- what my 10 mom had said that I'd done, and he came to me and 11 apologized to me for having gone through with the 12 whipping, you know, the belt. 13 I have to say, my mom never did that. 14 She couldn't. She knew what she knew. She was 15 raised how she was raised, and I had no power to 16 change what was inside of her, you know. 17 Q How did your parents' relationship 18 ultimately come to an end, to your understanding? 19 A When my father left, I didn't realize 20 that he had left. He left -- I was 15. I had 21 already left school and I was a musician, I was 22 playing in clubs and such. And he left for work</p>
<p>1612</p> <p>1 I -- I've seen my father strike a wall two or 2 three times, tops. Once when he broke his hand. 3 But two, three times, tops, you know. 4 Q Was your father ever abusive to you or 5 any of your siblings? 6 A No. My father was never -- my father 7 was not an abusive man. At the same time, my 8 father was also, to some degree, at the mercy of 9 Betty Sue because if he argued with what she 10 wanted done, and that would just turn into another 11 barrage of hatred towards him. So I can remember 12 my father coming home from work, and maybe I'd 13 gotten a bad report card or maybe I'd gotten in 14 trouble at school or something like that. And my 15 father would arrive home from work, and the first 16 thing she would say was, "John, take him out 17 there. He gets the belt. Give him the belt." 18 And he wanted to know what it was 19 about. So he'd take me out to the garage and I'll 20 never forget this white, thick leather, 1970s era, 21 thick leather, white belt that he would take off, 22 and then he would commence to inflict the</p>	<p>1614</p> <p>1 one morning, just like every day, and was packing 2 his car, and then he left. And then hours later, 3 my mom, Betty Sue, came home from work, it was 4 about 3:30 in the afternoon, and she walked in the 5 door and stopped and just looked around like she'd 6 felt something, and she just -- I said, "What's 7 wrong?" She said, your dad is gone. I said, 8 yeah, I seen him leave for work this morning. She 9 said, "No, no, no, no. He's gone, he's gone." 10 And she ran into their bedroom and into their 11 closet, and I followed her, and she opened the 12 door and there was one, you know, his side, his 13 rack of clothing and all his belongings were gone. 14 And she was quite upset. 15 And I took her car and drove to my 16 father's work and sat down in front of him, at 15, 17 and I said, "Listen, seems as though somebody 18 stole all your clothes out of the closet." And he 19 said, yeah, yeah. He said, I'm done. I can't. I 20 can't do it anymore. I can't live it anymore. 21 You're the man. You're the man now. 22 And those words didn't quite sit well</p>

1615	<p>1 with me. I didn't feel like I was ready to hear 2 those words. But, that's what I got. 3 Then, my mom got very -- went into a 4 very, very dark place, deep, dark, depression, as 5 you can imagine, and she -- one afternoon I woke 6 up, I'd fallen asleep, and I woke up and walked 7 out into the living room, and I saw my mother, 8 like, very feebly, and, like, almost, it was like 9 a slow-motion crawl. If I could stand up, I could 10 show you. Just the -- what I saw -- do you mind? 11 THE COURT: You can stand up. 12 THE WITNESS: Thank you. 13 A And I saw, I saw my mother, you know, 14 in that -- you know, in that mode. So, instantly, 15 I knew that something was dreadfully wrong. And 16 there's drool coming out of her mouth. As I was 17 about to run and call, the front door busted open 18 and my uncle and two paramedics came in and threw 19 her on the gurney and whisked her out of the house 20 to get her to the hospital to pump her stomach. 21 She had swallowed a multitude of pills to try to 22 take herself out. To try to commit suicide.</p>	1617	<p>1 relationship that he was in with Ms. Heard is. 2 MR. ROTTENBORN: Still, that's just -- 3 I have had a lot of restraint so far. He's 4 getting into what his dad told him about why he 5 left, so hearsay. 6 THE COURT: What? 7 MR. ROTTENBORN: If it's offered for 8 the truth, it's clear that they are trying to draw 9 a parallel. Make it Amber's family's here and 10 Johnny's -- 11 THE COURT: I don't know the -- what is 12 the answer, so I can just -- 13 MS. MEYERS: His understanding is that 14 his father -- that his mother had attempted -- 15 held a gun to his father and then to her own head. 16 And that's what his father told him. 17 Now, whether it's true or not, that's 18 what Mr. Depp understood the situation was and why 19 his father left. 20 THE COURT: So why is it relevant? 21 MS. MEYERS: It's relevant to 22 understanding why Mr. Depp would stay in this</p>
1616	<p>1 And when she got out of the hospital -- 2 she was a small firecracker of a woman, she was 3 about 5-foot 2, but when she got out of the 4 hospital, the depression was so deep, she was down 5 to, like -- she lived on the couch and she weighed 6 about 70 pounds. And, that, all that imagery spun 7 into my head at that time, that I thought that was 8 a very, in my head, at the time, I thought that 9 was a cowardly way for my father to have left, and 10 I was deeply upset by that. 11 And until my father and I had a 12 conversation, years later, where I asked him, what 13 really happened? How did it happen, when I was 14 older. And he told me the story -- 15 MR. ROTTENBORN: Objection, Your Honor. 16 MS. MEYERS: Your Honor, may we 17 approach? 18 THE COURT: Sure. 19 (Sidebar.) 20 MS. MEYERS: Your Honor, this is being 21 offered for his state of mind and understanding of 22 his relationship, the foundation upon which the</p>	1618	<p>1 relationship with Ms. Heard and why she would 2 ultimately leave. 3 THE COURT: I'll sustain the objection. 4 Move on. Thank you. 5 BY MS. MEYERS: 6 Q Mr. Depp, how did you feel about your 7 father when he left? 8 A I was -- I was very disappointed in him 9 because I started to believe that his exit was 10 sneaky, cowardly. He didn't -- when he said 11 goodbye to me, when he left to work that morning, 12 he said goodbye, bud. I said, see you later, Pop. 13 That was it. Until I learned the truth from him. 14 Q And without getting into what your 15 father told you, why is -- how has your impression 16 of your father changed now? 17 MR. ROTTENBORN: Objection. Relevance. 18 MS. MEYERS: Your Honor, this is just 19 an understanding of his perception of his family. 20 THE COURT: I'll sustain the objection. 21 Next question. 22 Q Mr. Depp, what have you learned from</p>

<p>1619</p> <p>1 your experience in your childhood and observing 2 your father in your childhood?</p> <p>3 A I learned that I was wrong about my 4 first impressions of his exit from the family, 5 very wrong. And I'll tell you one thing that I 6 learned that was one of the best lessons I believe 7 I ever learned in my life, ever could learn in 8 your life -- in my life, was based on my 9 experiences as a child and what I'd seen and 10 experienced, I knew exactly how to raise children 11 when my girl, Vanessa, got pregnant. I knew 12 exactly how to raise children, which was to do the 13 opposite of what they did, of what Betty Sue did. 14 Never raise your voice in front of the children, 15 never. Screaming out the word "no" to them. I 16 never wanted to tell my kids no. I wanted to tell 17 them that -- I wanted to show them that there were 18 options. You don't have to stick the coat hanger 19 in the electrical socket, you know. Saying no is 20 an abrupt thing. But to talk to them and say, "if 21 you understand the repercussions of something, 22 then you won't go there. So maybe think about</p>	<p>1621</p> <p>1 kind, she was funny, she was understanding. I 2 mean, we had many things in common, certain blues 3 music -- well, music and literature, things of 4 that nature. So for that year, or year and a 5 half, it was amazing. There were a couple of 6 things that, I don't know, stuck in my head that I 7 noticed, that I thought might be a little bit of a 8 dilemma at some point.</p> <p>9 For example, if I -- well, I worked 10 quite a lot. When I would come home from work, I 11 would come in the house, or the hotel, and she 12 would sit me down on the couch and give me a glass 13 of wine and take my boots off, set them to the 14 side, and I'd never experienced anything like that 15 in my life. I just never -- that was -- I just 16 never experienced that before. And it became a 17 regular thing that she did. It was kind of 18 routine.</p> <p>19 And I remember one night I came home 20 from work, and I think she was on the phone or 21 something, and -- busy, she was doing something. 22 And so I sat down on the couch and I took my boots</p>
<p>1620</p> <p>1 this as opposed to this. Give this some thought," 2 you know. But that will clearly -- you know, that 3 could kill you.</p> <p>4 So I would ease them away from things 5 of that nature with a more -- more of -- you have 6 a conversation as opposed to a, you know, flat-out 7 don't you ever do that again and threats, and 8 things of that nature. I did not raise my 9 children that way, nor did Vanessa. And we never 10 raised our voices in front of our children, ever.</p> <p>11 Q How do you think your experiences with 12 your parents and your childhood affected your 13 approach to your relationship with Ms. Heard?</p> <p>14 A I'm sorry? One more time.</p> <p>15 Q How did your experiences observing your 16 parents as a child affect your approach to your 17 relationship with Ms. Heard?</p> <p>18 A Well, in the beginning of my 19 relationship with Ms. Heard, there was -- from 20 what I recall, and what I remember, she was -- it 21 was as if she was too good to be true. She was 22 attentive, she was loving, she was smart, she was</p>	<p>1622</p> <p>1 off, and suddenly Ms. Heard approached with this 2 look on her face that -- and she just said, "What 3 did you just do? What did you do?" I said, "What 4 do you mean?"</p> <p>5 "You took your boots off."</p> <p>6 I said, "Yeah, yes, I did. You were 7 busy."</p> <p>8 "No, no, no. That's my job. That's 9 what I do. You don't do that. I do that."</p> <p>10 Okay. All right then. And then she 11 said, "Let me get you a glass of wine." And then 12 she brought me the glass of wine.</p> <p>13 But I did take pause, of course, at the 14 fact that she was visibly shaken or upset that I 15 had broken her rules of routine. I thought that 16 strange.</p> <p>17 And then, once that -- once you notice 18 something like that, then you start to notice 19 other little tidbits and things that come out. 20 And then, within a year or year and a half, she 21 had become this -- another person, almost.</p> <p>22 Q Mr. Depp, we're going to talk about</p>

<p style="text-align: right;">1623</p> <p>1 Ms. Heard in a couple minutes. But I'd like to, 2 first, talk about your career in Hollywood. 3 And, so, could you, please, tell the 4 jury how you ended up acting in the first place? 5 A I ended up acting by accident. I was a 6 musician and I moved out to Los Angeles with my 7 band, when I was 20 years old. And then there 8 were a couple of things that happened where the 9 band split up, and I remember I was filling out 10 job applications with a friend of mine, who 11 happens to be -- he was an actor, less known than 12 he is now, but Nicolas Cage, and I was filling out 13 job applications at any, you know, video stores, 14 clothing stores, anything, just to be able to pay 15 the rent. And Nick Cage said, you know, why don't 16 you meet my agent, you know, because I think 17 you're an actor. I think you could be an actor. 18 I said, I'll meet anybody. I'll do anything at 19 this point. 20 And so, he sent me to his agent, Eileen 21 Feldman, and I met with her. She sent me to read 22 for a casting director named Annette Benson, who</p>	<p style="text-align: right;">1625</p> <p>1 cast in 21 Jump Street, how did you enjoy acting 2 during that time? 3 A It was fun to me. It was fun to me. 4 But I didn't -- I didn't have any great ambition 5 to be an actor. I'm naturally, normally, I've 6 always been quite the shy person. I've also been 7 quite introverted. So there was a very strange 8 metamorphosis from being one of four, that is to 9 say one of four in a band, where you have this 10 fraternity or this brotherhood, and you're out 11 there fighting the world together to try to get 12 that record deal, whatever you're looking for, and 13 when the -- when I got on this series and my life 14 started to change in various ways, that is to say 15 that people started to -- you know, you go into a 16 restaurant and you'd see people whispering and 17 pointing, all that. I was very uncomfortable with 18 it. I was very uncomfortable with it, and I 19 didn't like it, just because it -- I never wanted 20 to be the lead singer and the guy out front and 21 get all the attention, and I didn't -- so, 22 suddenly, I was on my own and I was having to deal</p>
<p style="text-align: right;">1624</p> <p>1 was casting a film called the Nightmare on Elm 2 Street, and they brought me back to read for the 3 director, Wes Craven, and I read for Wes Craven 4 and somehow got the job. But, I mean, I was, by 5 no means, an actor. I didn't have any desire to 6 be an actor. I was a musician. But the fact that 7 these people were going to pay me what I found to 8 be a ludicrous sum of money, which was, it was 9 kind of the SAG minimum, it was \$1,284 a week, 10 which I had never seen that kind of dough before 11 in my life. 12 And so, I suddenly, you know, and I did 13 some others, a couple other dumb movies because, 14 still, in my mind, I was a musician, and this was 15 just a way to pay the rent, pay the bills, live. 16 And then, suddenly, I found myself on that road. 17 I had been placed on that road as an actor, and 18 then I -- one thing led to another, from film to 19 film, and then I was cast in a TV series called 21 20 Jump Street, when I was 22, I believe. 21 Q Mr. Depp, between the time that you 22 were cast in Nightmare on Elm Street and you were</p>	<p style="text-align: right;">1626</p> <p>1 with this newfound notoriety. And it was odd. It 2 was very odd, and it was -- yeah, it was a very 3 uncomfortable thing. I mean, I don't think it's 4 anything that one could get used to. I'm not -- 5 I'm still not used to it now, which I'm actually 6 glad that I'm not used to it. Because if I were, 7 I don't think I'd be the same person that I am. 8 Q Mr. Depp, did there come a time when 9 you became passionate about acting? 10 A Once I realized that that's the road 11 that I was on, and any attempt at going back to 12 music would be a -- would have been -- I hated the 13 idea that since the television series had come out 14 and I'd been exposed as this character or this 15 actor, I had to realize, in my own mind and heart, 16 that there was no going back to music because I 17 didn't want to -- you know, I didn't want to -- I 18 didn't want to use whatever amount of success that 19 I had attained from the TV series, and that sort 20 of thing, I didn't want to use that to influence, 21 you know, some career in music. I had far too 22 much respect for music than to just become what</p>

<p style="text-align: right;">1627</p> <p>1 they wanted me to become, which was a, you know, 2 teen idol or teen, you know, that sort of thing. 3 I fought that with every thing in my being, you 4 know. Once I realized that music was no longer an 5 option, then I began to study at various places, 6 the Loft Studio, which is now long gone, in 7 Los Angeles. I studied with some other teachers, 8 Sandra Seacat. I read all the books that you 9 could read. And all that was great, but you 10 realize that the only way to -- the only way to 11 learn -- or the only way to learn how to -- it's 12 not act, necessarily, the only way to learn how to 13 react and behave, because it's just behavior and 14 it's reaction, was to do it. It's on-the-job 15 training. It's trial by fire. So I did my best 16 to work up my own approach towards a character and 17 such. 18 Q And what were a couple of the first few 19 projects that you worked on where you were really 20 able to implement that approach? 21 A I would say -- I would say that the 22 first film that I had done, that I really took --</p>	<p style="text-align: right;">1629</p> <p>1 Wiley Coyote gets a boulder dropped on his head 2 and he's completely crushed, then they cut to the 3 next scene and he's just got a bandage on his 4 head. So I started thinking about the parameters 5 that were available to cartoon characters, and if 6 they were available to cartoon characters, and 7 nobody ever asked a question, whether you were 8 five or 95, you didn't ask a question. Oh, Wiley 9 Coyote, of course he's still alive. So I tried to 10 incorporate these kind of ideas into the character 11 of Captain Jack Sparrow so that -- so that I could 12 try to push those parameters and control the sort 13 of suspension of disbelief to be able to control 14 the character's actions, words, movements, and put 15 them in a place where the things that he would do 16 or say were so, either ludicrous or namely 17 something that -- also, something -- the cartoon 18 characters can get away with things we can't. 19 Captain Jack Sparrow could do things that I could 20 never do. He could say things that I could never 21 say. 22 So, it was, for me, a way to stretch</p>
<p style="text-align: right;">1628</p> <p>1 where I really felt, okay, I've done the work. I 2 know what I need to do, I would say that was -- 3 where I considered myself an actor, I suppose, was 4 when Oliver Stone cast me in Platoon, in 1986. 5 Q How did you come to be cast in Pirates 6 of the Caribbean? 7 A Well, that's many years later, but I 8 had been -- Disney had offered me a film called 9 Hildalgo. It was about a man, his horse in the 10 desert and stuff. And I read the screenplay, and 11 I just didn't think it was for me. But I wanted 12 to have a meeting with them because I -- at that 13 point, I had a two-year-old -- yeah, 14 two-and-a-half-year-old daughter, and, so -- or 15 three. And for three years, I watched nothing but 16 animated films, cartoons, from Tex Avery to Bugs 17 Bunny to -- that was all I watched with my little 18 girl. 19 And I received the screenplay for 20 Pirates, and it was -- somehow, in my mind, I saw 21 this opportunity, like a way to mesh characters, 22 like -- like cartoon characters. For example.</p>	<p style="text-align: right;">1630</p> <p>1 the parameters of a character and take a risk in 2 doing that. But if it panned out, and I felt I 3 was on a pretty good mission, if it panned out, I 4 felt that it might be a character who would be 5 accepted by five-year-olds and 45-year-olds, and 6 65-year-olds, and 85-year-olds, in the same way 7 that Bugs Bunny is, you know, the lead. 8 Q You mentioned that you received the 9 script. When was that? 10 A I'm sorry? 11 Q When did you first receive the script 12 for Pirates of the Caribbean? 13 A The first screenplay I received was 14 2002, I believe. Yeah, 2002. 15 Q And what did you think of that script 16 when you received it? 17 A I thought that it had all the kind of 18 hallmarks of a Disney film, that is to say a kind 19 of predictable, three-act structure with -- and 20 the character of Captain Jack was more -- he was 21 more like a squash bug or type that would kind of 22 swing in shirtless and, you know, be the hero.</p>

<p>1631</p> <p>1 And I had quite different ideas about the 2 character, so I incorporated my notes into the 3 character and brought that character to life, much 4 to the chagrin of Disney, initially. 5 Q Now, when you say you made changes to 6 the character, how did you do that? 7 A Just, you know, in preparation. You 8 know, the very same way that I've ever approached 9 any character. You look for a back history, base 10 it on, you know, it could be anything. Like 11 Edward Scissorhands, for example, was based on a 12 dog that I'd had and newborn babies. My sister 13 had a couple of new babies and I watched them, you 14 know, because I thought that Edward would see 15 things from this sort of -- from a place of 16 innocence and not knowing exactly what things 17 meant or were. And, also, that look of a pure, 18 innocent child when they experience something for 19 the first time. Those were the two main 20 ingredients that I thought would serve the 21 character. 22 And with Captain Jack, again, the</p>	<p>1633</p> <p>1 able to write for him. 2 So once you know a character better 3 than the writers, that's when you have to be true 4 to the character and add your words, add the 5 rewrites. 6 I was -- yeah, I believed in the 7 character wholeheartedly, and the -- initially, 8 the Disney folks were somewhat upset. 9 Q Now, you mentioned that the film was, 10 to your understanding, a great success. How did 11 your life change after the first Pirates of the 12 Caribbean movie came out? 13 A Well, I had been around for many years 14 already, and people knew who I was and all that. 15 After Pirates 1 came out, there was a completely 16 different -- it was a completely different way of 17 life, was being sort of -- my family and I were 18 being plunged into. That is to say at our house, 19 in Los Angeles, you would have people trying to 20 climb the gates to get in to see Captain Jack 21 Sparrow. You would have people trying to bust in 22 the gates dressed as Captain Jack Sparrow. And</p>
<p>1632</p> <p>1 cartoons, you know, Pepé Le Pew, you know, it's 2 like making a soup, you know. It's ingredients. 3 It's just ingredients. There's some Pepé Le Pew 4 in there. There's some Keith Richards in there. 5 There's a bit of a -- you know, I figured this is 6 a guy who's been on the scene for the majority of 7 his life, quite possibly his brain may have been 8 scrambled a bit by the sun, and, also, I felt that 9 he had been on the sea for so long that he had his 10 sea legs. But when he got on land, he just didn't 11 have his land legs. So, he could never quite 12 stand still. 13 Q How did the film ultimately turn out, 14 in your view? 15 A I didn't see it. But I believe that 16 the film, well, I mean, the film did pretty well, 17 apparently, and they wanted to keep going, making 18 more. And I was trying to do that, as it was -- 19 there's great freedom in being able to -- it's not 20 like you become that person, but if you know that 21 character to the degree that I did, because he was 22 not what the writers wrote, so they really weren't</p>	<p>1634</p> <p>1 you would have -- or follow you or follow you and 2 your family. So that was the moment when there 3 was no other way but to -- we had to hire more 4 security guards, and I was certainly worried for 5 my kids' safety. So that's when the -- instead of 6 just the one guy, there were -- you know, there 7 became several security people because I wanted to 8 make sure that my kids were safe when they went to 9 school or when they went to Disneyland or when 10 they went to the mall. Or whatever. 11 So, yes, more security and, you know, 12 then just getting followed, you know, by hoards of 13 paparazzi and things like that. I've had worse 14 jobs, certainly. I can't complain about it. But, 15 yeah, after a while, you realized that anonymity 16 has left the building a long time ago. You know, 17 anonymity's gone, and that's an odd thing to deal 18 with when you just -- I mean, you can't just drive 19 down to the diner and get a cup of coffee or 20 something. It's not possible. It turns into 21 something else altogether. 22 So it's, you know, it's acceptance, and</p>

1635
1 of course there is a bit of sacrifice involved. I
2 can't complain about the work that I've been
3 given. I can't complain about any of that. I
4 have no right to. But, it does make you have to
5 think very creatively, when you've got little
6 kids, about how to take them to the park or, you
7 know, to the swings or to this or that, or movie
8 or, you know, it becomes a strategic mission. And
9 that's what happened after Pirates.
10 Q Now, you mentioned your family. Who
11 did your family consist of at that time?
12 A Vanessa Paradis, the mother of my
13 children, we were together for 14, 15 years.
14 Myself, our daughter, Lily-Rose, and our boy,
15 Jack.
16 Q Now, you mentioned hiring more
17 security. Did you already have a security team at
18 the time that Pirates of the Caribbean came out?
19 A Yes. Because there had been -- there
20 had been more films prior to that, a number of
21 films prior to that. So I was recognized, I was
22 known, so if you wanted to attempt to have any

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1 experience that might be normal, you sort of had
2 to have somebody around to get you out of those
3 squirrely situations, should it arise. So I had
4 security prior to that for -- who would travel
5 with myself and my family. But not like, you
6 know, when I was at work, back then, I didn't have
7 security at work so much. Not before Pirates.
8 Pirates was really the -- that was the thing that
9 everything -- it all turned around. It all just
10 went weird.
11 Q So how did your security team change
12 after Pirates of the Caribbean came out?
13 A Well, like I said, it had -- it became
14 more strategic and you had to have more guys or
15 gals because Vanessa, if -- Vanessa, for example,
16 she worked in France quite a lot, and if she was
17 in France, and I was in LA with the kiddies and
18 working, security would -- security would
19 basically pick my kids up at school, whatever, and
20 bring them home. So, that became the routine,
21 driving them to school, bringing them home. And
22 if I went somewhere -- just the security guards

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1 kind of multiplied, because you needed to protect
2 your street, your house, your kids. Endless.
3 Q So after Pirates of the Caribbean, who
4 had been on your security team?
5 A Jerry Judge was with me for, oh, boy,
6 over 20 years. Jerry Judge is -- we mentioned him
7 before. It was a year or two ago, he -- Jerry
8 would go on film sets with me. He would do
9 reconnaissance missions, that is to say he would
10 go to a country before we would go there, make
11 sure all the hotel rooms were all taken care of
12 and such. Or when I went on tour with, say, the
13 Hollywood Vampires, which was a band that I played
14 with, he would come on the road with me, with
15 another security guard. So there was Jerry Judge,
16 there was Malcolm Connolly, who has been with me
17 for 20 years or more, Leonard Damian, Sean Bett,
18 Travis McGivern, Mark Gibbs. I mean, there were a
19 few.
20 Q Are all of these security personnel
21 still with you today?
22 A Jerry has gone on to somewhere else.

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1 Jerry made -- Jerry passed away from cancer, so
2 Jerry made his exit and -- but the majority of --
3 no, I believe all of those fellows are still with
4 me, yes.
5 Q When did Mr. Judge pass away?
6 A I believe it was two years ago,
7 roughly. Maybe a little less than two years ago.
8 Q Now, I'd like to go through a couple of
9 the names that you just mentioned. What is
10 Malcolm Connolly's purview in the realm of your
11 security team?
12 A What is his role?
13 Q Exactly, yes.
14 A Well, now that Jerry is -- Jerry and
15 Malcolm had worked together for a very long time,
16 so I met Malcolm through Jerry.
17 After Jerry's passing, Malcolm,
18 obviously, took over for Jerry, and, so, he
19 would -- he would -- he took on extra
20 responsibilities. He would have to make sure that
21 there was someone on the ground, wherever we were
22 going, that had done their recon, you know, the

<p style="text-align: right;">1639</p> <p>1 reconnaissance, to make sure that everything is 2 set up by the time we got there and that it would 3 be a straight shot into the hotel without a gaggle 4 of paparazzi. You know, you didn't have to walk 5 through 50 screaming, hollering photographers. 6 So, you know, you go in through a garage door, 7 through a slippery kitchen, and then you were 8 taken to your room, where you stayed. 9 Q When did Malcolm Connolly join your 10 team? 11 A Malcolm had joined -- Jerry brought him 12 on, so Malcolm has been with me for over 20 years 13 now. 14 Q And in those 20 years, how often have 15 you physically been present with Malcolm? 16 A With Malcolm? 17 Q Yes. 18 A Endless. Countless. All over the 19 world. All over the world. Everywhere. 20 Los Angeles, Japan, Serbia, you know, film tours. 21 Malcolm was my -- you know, he -- when we were on 22 the Vampires tour in Europe, throughout Europe,</p>	<p style="text-align: right;">1641</p> <p>1 out and signed for those people. I've always gone 2 out and signed for all, or as many as I possibly 3 could. I mean, to the point where sometimes Jerry 4 Judge would literally pick me up off the ground to 5 make me stop signing, take me away. 6 So, yeah, it was -- there's those kinds 7 of things at the beginning. You don't really get 8 used to that, you know. So -- 9 I forget what the original part of your 10 question was. I got lost in the gauntlet. 11 Q I'll move on. 12 THE COURT: Do you want to go ahead and 13 take a break now? Would that be okay for an 14 afternoon break? 15 MS. MEYERS: That's fine. 16 THE COURT: Why don't we go ahead and 17 do that. Ladies and gentlemen, we'll go ahead and 18 take our afternoon break. We'll take 15 minutes. 19 Do not discuss the case or do any outside 20 research, okay? Thank you. 21 (Whereupon, the jury exited the 22 courtroom and the following proceedings took</p>
<p style="text-align: right;">1640</p> <p>1 then Malcolm was on the bus with me. We lived on 2 the bus together, basically. 3 Q How often is Malcolm in LA with you? 4 A It depends. If there's -- or if there 5 was a larger premiere, you know, where, you know, 6 where it had to be worked out so that it didn't 7 turn into a chaotic and/or dangerous event. 8 Because sometimes, between you and the people, 9 there are these barriers, and sometimes the 10 professional photographers or the professional 11 autograph people will surge forward and in the 12 front rows of these, behind these barriers, you 13 have little kids and older women and older men. 14 So when the professionals would surge 15 forward, these people would start getting kind of 16 crushed against this metal deterrent. And that 17 was the most worrisome thing when you're at a 18 premiere. And there are thousands and thousands 19 of people there, and I've always called it running 20 the gauntlet. Essentially what it is, is the 21 people are there to say hi and to support the film 22 or the cast, or whatever. So I have always gone</p>	<p style="text-align: right;">1642</p> <p>1 place.) 2 THE COURT: All right. Just a 3 reminder, since you're on the witness stand, now, 4 you cannot discuss your testimony with anyone, to 5 include your attorney, all right? 6 THE WITNESS: Yes, Your Honor. 7 THE COURT: Let's come back, we'll come 8 back at 3:35. Is that fine for everybody? 9 Okay. Thank you. 10 THE BAILIFF: All rise. 11 (Recess taken from 3:18 p.m. to 12 3:35 p.m.) 13 THE BAILIFF: All rise. Please be 14 seated and come to order. 15 THE COURT: All right. Are we ready 16 for the jury? 17 MS. MEYERS: Yes. 18 (Whereupon, the jury entered the 19 courtroom and the following proceedings took 20 place.) 21 THE COURT: All right. Okay. You can 22 have a seat, sir.</p>

<p>1 All right. Your next question. 2 BY MS. MEYERS: 3 Q Mr. Depp, I'd like to just briefly go 4 through the security personnel that you just 5 listed out before we took a break. 6 How long has Leonard Damian been with 7 you? 8 A My kids are now 20, 23. Leonard's -- 9 Leonard Damian's been with me, I believe, roughly, 10 the same time as Mr. Bett, somewhere in the 11 neighborhood of 16, 17 years. Yeah, I can't be 12 precise, but they were very young. My children 13 were very young when they joined the team, which 14 was, really, after Pirates was released in 2003, 15 at first. 16 Q Now, you mentioned your children. What 17 is Mr. Damian's role with respect to your 18 children's security? 19 A Excuse me? 20 Q You mentioned your children. 21 A Yes. 22 Q With respect to Leonard Damian, is his</p>	<p>1643</p>	<p>1 Q How has the fame associated with that 2 franchise affected your personal relationships? 3 A Again, I would never complain about the 4 repercussions, let's say, yeah, the repercussions 5 of the success of that film. But, of course, as I 6 said, there are sacrifices that one has to make, 7 sacrifices that you're not necessarily ready for. 8 Just, simply, when you check into a -- when you go 9 to a town or if you go on a press tour or 10 something and you're staying in a hotel, people 11 stay in hotels all the time. I stay in the hotel. 12 We found that it's just a lot easier if I stay put 13 in a hotel and not kind of -- again, especially if 14 it's with the kids or something, I don't want them 15 to -- I've never wanted them to see me as a 16 novelty, I just wanted to be Dad. Now, they're 17 well aware of a lot, they're well aware of pretty 18 much everything. 19 But when you get -- when you get 20 recognized wherever you go, the basic truth is, 21 it's pretty simple, people are genuinely kind and 22 curious. If they've grown up with you in their</p>	<p>1645</p>
<p>1 role in connection with your children's security? 2 A Yes. Very much so. Leonard -- yes, 3 Leonard Damian and Sean Bett, for quite a while, 4 were both sort of assigned, as it were, to my 5 kids. Taking them to school, picking them up from 6 school, if Vanessa and I were unable to do it. Or 7 even if we were there, we would ride with them to 8 take the kids to school. 9 And over the years, obviously, your 10 children -- my children have taken quite a shine 11 to them, and they've become, like, another set of 12 parents, in a way. 13 Q And how long has Travis McGovern been 14 with you? 15 A Travis, I believe, a little bit less 16 than that, I believe. I couldn't really 17 speculate. Just a little less. Maybe 13 years, 18 or, I don't know. 19 Q Now, you mentioned that you had to 20 bring on additional security after Pirates of the 21 Caribbean. 22 A Yes.</p>	<p>1644</p>	<p>1 living room from a television series or from 2 various films that they've seen, there's nothing 3 menacing about being recognized. Sometimes it can 4 be. I mean, sometimes people can get -- go -- get 5 weird. But we've found that it's just -- it's 6 better, all around, if I stay in my hotel room and 7 don't go out to too many restaurants or anything. 8 Because it generally causes a bit of a hubbub if 9 you go a restaurant, someone calls the paparazzi, 10 you go out for a meal and you come out and there's 11 30 guys out there. It can be a little 12 overwhelming. It's not something -- I think I 13 said it before. It's not something that -- it's 14 not something that I've ever gotten used to, and 15 it's something that I hope I never get used to 16 because I don't think of myself in those terms. 17 I used to be Johnny, if that makes 18 sense. I used to be Johnny. And then my name, 19 full name, which I honestly find -- still, it's 20 difficult, it's uncomfortable to say my own name 21 because when I say it, I hear the commodity, I 22 hear the product.</p>	<p>1646</p>

<p style="text-align: right;">1647</p> <p>1 So I just went from Johnny to Johnny 2 Depp, and then that name -- with that name, Johnny 3 Depp, and some image was cultivated, certainly not 4 by me, but the media, especially in those days, 5 they must label you. They have to give you a 6 label. And labels are one of the things that I've 7 fought, vigorously, with regard to my work. I 8 never wanted to be the poster boy. I never wanted 9 to be the -- I don't have -- you know, I'm not 10 built with that kind of hubris, I don't -- I don't 11 have that kind of confidence. I can do virtually 12 anything playing a character. I can become a 13 character in my work, and that character may be 14 able to spit out a hundred words a minute. But 15 me, myself, Johnny, I cannot. 16 So therein lies the difference. 17 Q Mr. Depp, other than acting, what other 18 artistic pursuits do you have that may be a little 19 less known to the general public? 20 A Well, I've remained a musician. I've 21 been a musician. I started playing the guitar 22 when I was 12 years old. And that saved my life</p>	<p style="text-align: right;">1649</p> <p>1 painting or a guitar note. All of those things 2 should come from a place of -- an organic place, a 3 place of truth, because if they don't, well, then 4 you're just lying, aren't you? Every bit of 5 truth. A person doesn't have to say anything on 6 film. What's important is what's behind the eyes. 7 And if they do say something, what's important is 8 not necessarily the things they say. It's very 9 easy to say I love you, but what brings it into 10 the realm of truth is what's underneath it, what's 11 not being said, the subtext, if you will. 12 So, any artistic or creative venture, 13 any film, anything that I do, that's where I'm 14 coming from. That's my approach. 15 Q Mr. Depp, you mentioned words and I 16 think the jury has already seen some words that 17 you've written in text messages. 18 A Yes. 19 Q Can you please tell the jury a little 20 bit about how you write? 21 A Certainly. When I was young, when I 22 was about 12 years old, my elder brother, Danny,</p>
<p style="text-align: right;">1648</p> <p>1 because I locked myself into a -- in my bedroom, 2 at the age of 12, listening to, you know, records, 3 moving the needle back, and then learning that 4 piece and then learning it again. 5 So, so much so that I don't remember -- 6 I have no memory of going through puberty. I was 7 just playing the guitar. I was just -- I was 8 obsessed with my guitar. 9 Q Any other artistic pursuits? 10 A Yeah. I mean, I've always drawn since 11 I was very small, since I was very little, and 12 always enjoyed drawing. And then began to paint 13 and, so, started learning about painting and 14 trying to -- I suppose different ways of 15 expressing oneself, different ways to release 16 things that are living in your head, whether they 17 be beautiful memories, whether they be horrific 18 memories, whether they be -- I have a -- I need to 19 create. It's a need. It's a -- of course I want 20 to create, as well. But I actually need to create 21 because I need to summon whatever it is that I 22 need to summon, whether that's in a film or a</p>	<p style="text-align: right;">1650</p> <p>1 walked into my room and ripped the Peter Frampton 2 record off my record player, threw it across the 3 room and said, you've got to stop listening to 4 this stuff, and he put this record on and it 5 started, and I'd never heard anything like it, it 6 was called Astral Weeks by Van Morrison. So I'm a 7 kid, I'm 12 years old, so my brother turned me on 8 to Van Morrison, then he turned me on to 9 soundtracks like Clockwork Orange or Last Tango in 10 Paris. He turned me on to books by Jack Kerouac; 11 he turned me on to books by Ginsberg, Philip K. 12 Dick. I mean, Salinger, the whole, James Joyce, 13 Hemingway. The whole thing. 14 So, I became very interested in the 15 vocabulary and the unique voices of these writers. 16 And then I started reading people like Tom Robbins 17 and Hunter S. Thompson, and then ended up becoming 18 very close friends with Hunter Thompson for the 19 last 10, 12 years of his life. And Hunter's 20 writing, of course, because of the amount I 21 spent -- of time I spent with him, has influenced 22 my writing greatly.</p>

<p>1651</p> <p>1 Hunter was known for inventing a thing 2 called gonzo journalism, which it's the author 3 putting himself in a situation. As opposed to 4 writing it from the author's point of view, he 5 writes it with him in it, and they are great 6 embellishments, embellishments, they are great 7 sort of ways that he would twist things and 8 express his feelings. And so, he became a huge 9 hero, of course, to me and a great friend. 10 In my texts and in my emails, sometimes 11 just even in my writing, you do -- you take -- you 12 take the subject and you try to express it in your 13 own vernacular. And in that, for example, with 14 the text messages, that I apologize that 15 everyone's had to experience, I am ashamed of some 16 of the references it made. I'm embarrassed that, 17 at the time, the heat of the moment, the heat of 18 the pain that I was feeling went to -- went to 19 dark places. There is no -- if you're writing, 20 there is no set place that you have to stay in. 21 You can travel. And sometimes pain can be -- has 22 to be dealt with, with humor. And sometimes dark,</p>	<p>1653</p> <p>1 And I -- but I know I'm in this situation and I 2 know that it cannot continue. 3 Q Mr. Depp, the jury's heard quite a bit 4 from Ms. Heard's side about your drug and alcohol 5 use, but I'm sure they would like to hear from 6 you. So, can you, please, just tell them about 7 your history of substance use? 8 A Certainly. Again, this goes back to 9 when I was a young boy. Excuse me. At about the 10 age of, I don't know, four or five years old, I 11 can remember, vividly, my mom telling me to go get 12 her nerve pills, you know, out of her purse that 13 was hanging on the back of the door. So I'd go 14 get the nerve pills and I'd bring her the nerve 15 pill, she'd take it and, you know, after a few 16 years, you start to notice -- well, you start to 17 think about nerve pills, nerve pill. And then she 18 seemed to calm down after she took those "nerve 19 pills." 20 So, when I was 11 years old, I wanted 21 to calm down and I didn't know how to. So I'd 22 bring my mom her nerve pill, I would walk away and</p>
<p>1652</p> <p>1 very dark humor. 2 I grew up watching Monty Python, you 3 know, so, yes, it can tend to get into dark humor. 4 It can tend to get -- words are used that -- for 5 emphasis, and words are used to express what 6 you're feeling at the time. And it's just like 7 growing up, you learn from those mistakes. You 8 learn from those things and you move forward, you 9 know. And that's how you -- that's how you start 10 to understand your own vernacular and what's 11 important, you know, what's necessary and what's 12 not necessary. 13 I tend to be quite expressive in my 14 writing. And after the unfortunate words of 15 Ms. Heard made their way into my heart and my 16 head, those are two very opposing things. So 17 you're trying to -- you're trying to find the best 18 way to express something to a friend. Sometimes 19 you're exaggerating, you know, something that 20 you've done, just to make it sound -- just to make 21 him understand that, you know, I'm on planet 22 question mark here. I don't know what's going on.</p>	<p>1654</p> <p>1 I would (indicating) take one myself to escape 2 caring so much -- feeling so much. To escape the 3 chaotic nature of what we were living through. 4 So, that was the beginning. Then I realized that 5 nerve pills calm the nerves. It's a pretty young 6 age to do that. I can't say that I'm proud of 7 admitting to that. But I have to say that I knew 8 not what else to do. I knew nothing else that I 9 could do. So as we were all growing up, there 10 were always those kids who would say, "Let's 11 party. Let's go party. I want to party." 12 I never used the word party in my life. 13 I was never -- I've never taken any substance for 14 a party. I have taken the substances over the 15 years, on and off, to numb, to numb myself of the 16 ghosts, the wraiths that were still with me from 17 my youth. 18 So I needed -- yeah, everything -- it 19 was essentially self-medication. One of those 20 get-me-out-of-here moments, where you want to 21 escape from is your own brain, your own head. 22 Q How often have you used substances</p>

<p>1 throughout your life? 2 A It started with my mother's nerve pills 3 at 11. Of course, the, you know, that's around 4 the age that you're introduced to marijuana, 5 you're introduced to -- and, also, depending on 6 the -- where you're living and who you're 7 associating with, it was around the neighborhood. 8 I, you know, I wasn't shy to try a substance 9 for -- to see if the effect of it would maybe even 10 take a bit more of the edge off. So I started at 11 11, and I mean, I even mentioned this in an 12 interview in TV Guide, if anyone remembers TV 13 Guide, in 1989, where I was asked, by the 14 journalist, why I believed that kids who were 15 watching the show, 21 Jump Street, about police 16 officers in school, undercover, as undercover 17 cops, but as students, I was asked why people -- 18 why these kids, whether they should believe me or 19 trust me or listen to me. I said, look, I 20 could -- because I've experienced it and I can 21 tell them that there is no future in it. That 22 there's nothing but a kind of a postponing of the</p>	<p>1655</p>	<p>1 But the characterization of -- the 2 characterization of my substance, "substance 3 abuse" that's been delivered by Ms. Heard is 4 grossly embellished. And I'm sorry to say, but a 5 lot of it is just plainly false. 6 I think that it was easy -- it was an 7 easy -- I think it was an easy target for her to 8 hit, because once you've trusted somebody for a 9 certain amount of years and you've told them all 10 the secrets of your life, that information, then, 11 of course, can be used against you, especially if 12 it's taken to a point that is teetering on 13 impossible and teeters over impossible, in fact, 14 at times. And so, I am not some maniac who needs 15 to be high or loaded all the time. I -- in fact, 16 in Australia -- before Australia and in Australia, 17 I had been off of alcohol for, I believe it was 18 about 18 months. 19 Q Mr. Depp, you've mentioned some periods 20 of sobriety throughout your life. How many would 21 you estimate you've had? 22 A Quite a number. You know, on various</p>	<p>1657</p>
<p>1 inevitable, that one day, you're going to have to 2 face those feelings. One day, you will meet 3 those, let's call them "demons," from your youth. 4 So, I was straight-up open and honest, 5 at that time, in a very -- I mean, TV Guide was -- 6 it was read at the register when you checked out 7 at the grocery store. It was the most popular 8 thing. It was a very straight little magazine. 9 But I told them I'd pretty much done all of the 10 drugs I was aware of by the time I was 15 years 11 old, which was true. 12 Now, that doesn't mean to say that I 13 continued into that, you know, forest of 14 possibilities with regard to substances. I wasn't 15 dropping acid every five minutes. I wasn't -- 16 there were many years that I didn't touch a 17 substance, and no drugs. There were many years 18 that I didn't have a drink. So it's -- as I said, 19 it's not been for the party effect, it's been 20 for -- to try to numb the things inside that 21 plague -- that can plague someone who has 22 experienced trauma.</p>	<p>1656</p>	<p>1 films. You see, I guess, maybe by example, if 2 you're familiar with Hunter Thompson's book Fear 3 and Loathing in Las Vegas, which I was lucky 4 enough to make into a film with Terry Gilliam, the 5 film calls for myself and my attorney to be 6 absolutely blotted out of our head, constantly 7 throughout the film. And most people just assumed 8 that -- well, they just got wasted and they filmed 9 them. There would have been no way to -- you 10 couldn't act that. I mean, you couldn't make that 11 film with two actors who were loaded. There would 12 be no way. And then to the other extreme, Donnie 13 Brasco, a film that I made about an FBI agent, I 14 had to go into a training regime, where I had to 15 eat five meals a day, drink five shakes a day, you 16 know, these protein shakes per day, work out three 17 to four hours a day because I had to gain 20 to 18 30 pounds of muscle. There was certainly no abuse 19 of substances then. 20 There's been no abuse of substances on 21 film sets. There have been no -- there's been 22 no -- there's been no moments where I would have</p>	<p>1658</p>

<p style="text-align: right;">1659</p> <p>1 been considered out of control, never. In fact, 2 it's not been mentioned, like I'm sure they don't 3 want to mention it, but I remember because we -- 4 when I was with Ms. Heard and her friends and we 5 were all drinking wine, and I was smoking 6 marijuana, they used to tease me because of what 7 they said was a ludicrous tolerance because I 8 never appeared loaded or high or any of that. 9 Even if I felt a little spinny, no one would have 10 ever known. 11 Q Mr. Depp, is there any substance that 12 you've ever been addicted to? 13 A Yes. 14 Q And what is that? 15 A Roxycodone or Roxycontin, which is an 16 opiate. I think oxycodone has the opiate, and 17 then some pain, like a paracetamol or something, 18 and then the roxys are just the opiate, as far as 19 I remember. And when I was working on Pirates 4, 20 and there was a scene in which I had to grab this 21 large gold and red, you know, stately gilded 22 chair, pick it up and throw it, chuck it out this</p>	<p style="text-align: right;">1661</p> <p>1 taking those pills to get high, you're taking 2 those pills to get well or to get better. Because 3 if you're without the pill, your body will start 4 to go into various -- you'll -- withdrawals. 5 And so, I was on the roxys -- roxys for 6 a number of years, four or five years I think, 7 maybe more. But the key was I -- if you take two, 8 you will be, what they call on the knot. You will 9 be that. You will just drop into sleep. 10 So, yes, I didn't like being dependent 11 on these pills. I didn't like being dependent on 12 a drug that would -- you'd take only so you 13 wouldn't get withdrawals. That's what it becomes. 14 It's like a junkie -- the reason why so many -- 15 well, now, there's a huge fentanyl problem. The 16 reason why junkies, generally, why they end up 17 overdosing is because they're looking for the 18 first high again. And you don't get that. You 19 don't get your first high again. 20 So, what do you do? You up the stakes 21 and you put more, you take more. And that's what 22 makes them -- that's what makes things go dark.</p>
<p style="text-align: right;">1660</p> <p>1 big, giant window. And so, I did it and as I 2 swung around to throw the chair out of the window, 3 I felt this immediate electricity from the bottom 4 of my spine down to -- down my left leg, and it 5 was like an electricity that burned. 6 So, I had obviously done -- sciatica, 7 so I'd obviously pinched something, done 8 something. So I went to -- I saw a chiropractor, 9 or PA, whatever, I saw a chiropractor, and to no 10 avail, then I saw a doctor. And the only pain 11 medication that she recommended and prescribed to 12 me was Roxycodone. And there was a part of me 13 that was a little bit worried, just in the sense 14 that I know I witnessed friends and people, over 15 the years, who have -- who've had problems with 16 heroin, you know. And I didn't want to get bit by 17 that snake. And I started taking the roxys and I 18 was bit by the snake, and then before you know it, 19 that monkey is on your back to stay. 20 And it's not like you take those pills 21 to get high, you take them to -- once the 22 addiction has grabbed hold of you, you're not</p>	<p style="text-align: right;">1662</p> <p>1 Because they overestimated the amount that they -- 2 that their body could tolerate, and they go blue 3 and they die. So, yeah, I didn't want that. 4 Q Mr. Depp, do you have an estimate as to 5 what year you started taking the opiates that you 6 just described? 7 A 2000 -- or excuse me. It was 8 Pirates -- bless you -- 4, I believe. No, it was 9 Pirates 4. Rob Marshall directed it. I don't 10 know what year that was, maybe -- actually 11 don't -- I don't know what year that was. 12 Q Was it before you were in a 13 relationship with Ms. Heard? 14 A Yes, I believe so. 15 Q And you detoxed from those opiates 16 during your relationship with Ms. Heard; is that 17 right? 18 A Yes. Yes. Of course, yes, so they 19 must have -- yeah, they did come around prior to 20 my meeting Ms. Heard. 21 Q After you detoxed from the opiates, 22 have you ever taken any opiates ever again?</p>

<p>1663</p> <p>1 A No. I can't. No. Once you've been 2 bit, you'll be bit again. No, with my -- I mean, 3 even with my finger, I think it was, like, Motrin 4 800, you know, but no opiates, no. I have not 5 taken an opiate since -- and I won't, unless I 6 plan on going through the hell of the pure horror 7 of detoxing, of coming off those drugs. No. No. 8 Q Mr. Depp, I would like to, now, turn to 9 your relationship with Ms. Heard. 10 Can you, please, tell the jury how you 11 met Ms. Heard. 12 A Uh-huh. 2000 -- in 2008, Hunter 13 Thompson and I were going through some of his 14 manuscripts of his books that had been published, 15 and then I found this manuscript in one of his 16 boxes, and it was called the Rum Diary. And I had 17 heard about it and I knew it was, what they 18 called, his long, lost novel; in fact, the only 19 novel he ever wrote. And I showed it to him. 20 Hunter was -- Hunter was shocked, my god, that's 21 where it is. And so he said read me some. So I 22 started reading this to him and he said, "This is</p>	<p>1665</p> <p>1 proceeded. 2 During the auditioning process, Bruce 3 was -- Hunter had very specific ideas of what 4 these characters should be. Bruce had been 5 auditioning girls for the role of Chenault in the 6 film, and there was these sort of starlets that 7 were up and coming, and there were some that were 8 well-known, things of that nature. But, you know, 9 one of the things that Hunter was very against was 10 stunt casting. That is to say put a bunch of very 11 famous people in a movie and let them go, and then 12 hope for the money in the end. 13 So Bruce had asked me, he said he had 14 been auditioning this one particular actress named 15 Amber Heard. He said that he'd auditioned her 16 five times and he was -- he wasn't sure about her 17 capabilities as an actress with regard to the film 18 and the character and taking direction, and that 19 sort of thing. So he asked me if I would read 20 with her for the film. And I had met -- already 21 met a number of actresses and things. And so what 22 I said to Mr. Robinson, I said, Bruce, if you've</p>
<p>1664</p> <p>1 a movie. We must produce this together." 2 And he got all excited of the idea of 3 doing this. So we went right into it, and we 4 started to set up meetings to get money, 5 financing, to develop the project. And we finally 6 ended up getting the money to develop the project 7 and to make the film. 8 Hunter, from his own dilemmas in his 9 life, committed suicide, and -- but I -- having 10 had long, long talks with him, I knew every angle 11 of the book, but I knew every angle of the film 12 that he wanted, which was going to be a bit 13 different than the book. And Bruce Robinson, who 14 was a great writer/director, directed a film 15 called Withnail and I -- and how to get ahead in 16 advertising was the one of the things that Hunter 17 and I talked about, so I went to Bruce, who was a 18 friend of mine, and I ripped him out of 19 retirement, because he never wanted to direct 20 another film again. I pulled him out of 21 retirement after 27 years, and he agreed to write 22 the screenplay and direct the film, and we</p>	<p>1666</p> <p>1 auditioned her five times, you've seen the best 2 and the worst, I supposed. So me putting her, 3 this girl in an uncomfortable situation, you know, 4 saying, all right, let's read this, I think is -- 5 I think it's a far better idea that we just meet 6 so that I can see how she behaves, see how she 7 reacts, because that's all it is, reaction, 8 behavior, and you don't have to push anything 9 else, you know. 10 So I made an appointment. She came to 11 my office. I took one look at her and I thought, 12 yep, that's the Chenault that Hunter wants. 13 That's the one. I just, I thought, yeah, she 14 could definitely kill me. That's what Hunter 15 wants. 16 And so, we spoke and she was sweet as 17 pie, pleasant. Again, you know, intelligent, 18 literate, very good taste. And I felt like if 19 she -- what I felt and what I told Bruce was, 20 look, when you put someone in a situation that 21 they're obviously going to feel under pressure, 22 it's not the best way to really know what they're</p>

<p style="text-align: right;">1667</p> <p>1 capable of. And I made suggestions, such as -- 2 which I end up making to Ms. Heard, I made 3 suggestions of films that might give her some 4 insight into what we were looking for in terms of 5 the film, which is -- I have her films like To 6 Have and Have Not, and things of that nature, 7 because I wanted to -- there was something very 8 important that she -- I felt she needed to know 9 about stillness, as opposed to, you know, going 10 broad or taking -- acting a little too much. 11 So I felt like I could -- I felt like I 12 could be a bit of a traffic cop in that sense so 13 that -- because if we could connect, then it 14 would -- it could work, as long as there was truth 15 in her eyes and as long as there was truth coming 16 out of her dialogue, you know, then it's all in 17 the editing. So I felt that I could help her with 18 that idea of stillness. 19 So that's where I -- that's when I 20 first met Ms. Heard. 21 Q How would you describe your 22 interactions with Ms. Heard when you worked</p>	<p style="text-align: right;">1669</p> <p>1 Because if she took her shirt off and she had a 2 red bra on, and a skirt, then if she had a red bra 3 in her hand when the crowd surged in on her, all 4 she had to do was lift the red bra up out of the 5 crowd and there's no nudity. But, it's certainly 6 implied. Because then she disappears for -- the 7 character disappears for a few days and she's 8 quite a wreck when she comes back because bad 9 things have happened to her. 10 So, I remember telling Ms. Heard, hey, 11 you don't have to take your clothes off. You 12 don't have to take your top off. You don't have 13 to -- everything's cool. And she was 14 appreciative. 15 But other than that, we didn't really 16 have much interaction until there was a scene 17 where I was -- I'm taking a shower and then she 18 comes into the room and she walks, opens the 19 shower and we kiss. And that moment was -- it 20 was -- yeah, it was -- it felt like something -- 21 it felt like something that I shouldn't be feeling 22 because she had her wife, even though it was a</p>
<p style="text-align: right;">1668</p> <p>1 together on the Rum Diary? 2 A It was mostly very few interactions. I 3 remember there was a time -- I wasn't working that 4 day, but I was producing, you know, one of the 5 producers of the film. And it was a scene from 6 the book that was -- it was a scene where 7 Ms. Heard's character was in a nightclub and 8 amongst the locals, and she's very drunk and 9 everybody's very drunk, and she ends up dancing 10 with a few of the local, like one of the local 11 guys and stuff, and then the other local guys 12 started to close in on her. In the book, in the 13 screenplay, as it was written, there was a 14 requirement for nudity for the part. And I was on 15 set the day that they were shooting that, and as I 16 was watching the crowd coming in on her, I 17 realized, you know what -- because I would check 18 on Ms. Heard and say, "Are you all right? Are you 19 sure you're okay?" Because this was -- she was 20 like, I'm fine, fine, fine. But I noticed, with 21 the crowd inching in towards her, that we didn't 22 have to do -- we wouldn't have to do the nudity.</p>	<p style="text-align: right;">1670</p> <p>1 scene. And she had a wife and I had Vanessa and 2 the kiddies and, yeah. 3 Q When would you say your romantic 4 relationship with Ms. Heard actually began, if not 5 in that moment? 6 A Well, I think there was something in 7 the kiss in the shower that was very real. So 8 that day after work, Ms. Heard had come to my 9 trailer and I was -- I was just sitting there 10 listening to, actually, old blues stuff, and we 11 had a glass of wine and we kissed. 12 By that point, my trailer was the only 13 trailer in the parking lot. She had a mind to 14 stay in the trailer there for a while with me, and 15 I didn't think that was a very good idea, on any 16 level, especially since there were about nine 17 Teamsters waiting to move the trailer, and then 18 that was that, until whenever the -- we did the 19 first day of the press junket for Rum Diary in 20 Los Angeles, two years later, and she had broken 21 up, I believe, with her wife and my, for lack 22 of -- not my wife, we weren't married, married,</p>

<p>1671</p> <p>1 but she was, of course, my wife, Vanessa, we had 2 had some not-so-great situations, you know. She 3 wanted -- she needed -- she was stuck in America. 4 She wanted to go back to France. She wanted to 5 have her life back. She's a well-known singer 6 there, she's a well-known actress there, and, you 7 know, she wasn't fulfilled in her creative world, 8 and that's a frustration that I wouldn't wish upon 9 anybody. So, we broke up and that's -- right 10 around then is when Ms. Heard and I started to see 11 each other here and there, occasionally. 12 Q Between the end of the filming of the 13 Rum Diary and the press junket, did you and 14 Ms. Heard communicate at any time in between? 15 A I don't remember. I remember that 16 there was a white dress that she was really -- she 17 really was infatuated with, that she really loved 18 this dress that she wore in the film, and, so, I 19 went to Colleen Atwood, the costume designer and 20 Bruce and I said, do you think we can snag this 21 white dress and send it to Amber, you know, after 22 she'd left. Because she loved the thing. I</p>	<p>1673</p> <p>1 back of your mind. You know, if she wanted to go 2 to bed, I'd say, oh, I can't sleep right now. I'd 3 love to just go and lay in the bed and stare at 4 the ceiling. I would say, you know, I'll just 5 watch -- I will be out here watching TV and 6 hanging out. And that was just not acceptable. 7 Just not acceptable. It would stir up some rather 8 unusual reactions from her. I didn't understand 9 why I, as a 50-something-year-old man, was not 10 allowed to go to sleep when I wanted as opposed to 11 when she wanted to. It started out with little 12 things like that. And, again, they just -- they 13 eventually -- they just, I suppose like anything, 14 if they're allowed to continue, then they're 15 allowed to grow, they're allowed to blossom into 16 whatever they were going to become. 17 Q What were you and Ms. Heard's nicknames 18 for each other? 19 A I called her Slim. 20 Q Why is that? 21 A I called her Slim because the film I 22 had given her to watch, in terms of stillness, was</p>
<p>1672</p> <p>1 remember talking to her, I think, then, but 2 briefly, briefly. 3 Q What did you like about Ms. Heard when 4 you first started your romantic relationship? 5 A She seemed to be -- she seemed to be 6 the -- she seemed to be the perfect partner in a 7 sense, in my head, for me. Because she -- as I 8 said, she seemed to be very knowledgeable about 9 old, obscured blues music that I listened to and 10 really liked. She was literate and she was sweet, 11 funny, nice, all those things, you know. And 12 she -- and from the beginning of our relationship, 13 at that time, for a good year, year and a half, 14 she was wonderful. And then things just started 15 to change or things started to reveal themselves, 16 I think is a better way to put it. 17 Q You mentioned earlier, in your 18 testimony, that Ms. Heard would take off your 19 boots when you would get home from work. What 20 other types of behaviors did you observe in 21 Ms. Heard early in the relationship? 22 A Little things you would question in the</p>	<p>1674</p> <p>1 Lauren Bacall and Humphrey Bogart, and I called 2 her Slim and she called me Steve, which was Lauren 3 Bacall's and Humphrey Bogart's nicknames for each 4 other in the film. That was their names in the 5 film. And, you know, it wasn't -- also wasn't 6 lost on me the fact that there was an age 7 difference and that, my god, when Humphrey Bogart 8 and Lauren Bacall, that's when they met, on that 9 film, he was 45 years old and she was 19, and they 10 stayed together until -- well, for many years, 11 until Bogart passed away. 12 So, yeah, there was a kind of a joke -- 13 not joke, but just -- yeah, I acknowledged the 14 fact that I was the old, craggy Bogie and she was 15 this beautiful creature. This stunning creature. 16 Q When did you first meet Ms. Heard's 17 parents? 18 A I first met Ms. Heard's parents when 19 they had come out to Los Angeles, I believe. 20 And -- yeah. And I feel like that I -- I think 21 they came to my place, to my studio, and they were 22 two completely opposite ends of the spectrum</p>

<p style="text-align: right;">1675</p> <p>1 people. Paige was – she was an angel. She was 2 an angel. And I loved her very much. I loved her 3 instantly, and we had a very good relationship. 4 Her father, Dave, was the opposite end 5 of that. He was this outrageous kind of, almost 6 like a cartoon cowboy, you know. And he was – 7 the initial thought – I mean, my initial kind of 8 definition for David would have been rascally, 9 like a rascal, you know. But I – I loved – I 10 mean, I grew to love them both very much, as well 11 as her sister, Whitney. And then, you know, it 12 felt like I had been welcomed into some sort of 13 family. I had been accepted into this family. 14 And those relationships stayed solid until just a 15 bit after we'd separated. 16 Q How often did you spend time with 17 Ms. Heard's parents during your relationship with 18 Ms. Heard? 19 A Quite a lot. Whenever we – I used to 20 have a boat and we would go – we would take her 21 parents, her family, and we'd go sail the boat 22 and, you know, drop anchor at the island and we</p>	<p style="text-align: right;">1677</p> <p>1 MR. ROTTENBORN: Objection, Your Honor. 2 Foundation. What he saw in Whitney? 3 THE COURT: I think if he can answer 4 the question. 5 Do you want to ask the question again? 6 That's fine. 7 MS. MEYERS: We can move on. 8 THE COURT: Okay. That's fine. 9 Q How would you describe your 10 relationship with Whitney? 11 A Great, fantastic. She was – I called 12 her "Sis." 13 I loved her, you know. I felt – I 14 always felt something – I always felt like 15 Whitney had missed out on something. 16 MR. ROTTENBORN: Same objection. 17 MS. MEYERS: We can move on. 18 THE COURT: Okay. Thank you. 19 Q Where was Whitney living when you and 20 Ms. Heard first started your relationship? 21 A She was living with her then boyfriend, 22 Shawn Krajewski.</p>
<p style="text-align: right;">1676</p> <p>1 would spend a week, two weeks, whatever, on the 2 boat on the island. Also, they would come to 3 Los Angeles quite a bit. We also would go to 4 Austin here and there to see them, visit them. 5 Every year, we would, on their anniversary, I had 6 a friend of mine who had a restaurant in Austin, a 7 very good restaurant in Austin, and I'd call him 8 up and basically set it up so that every year, on 9 their anniversary, they can just go there and 10 they'd be taken care of and there would be no bill 11 so they could just celebrate. I think one of the 12 things we did was, yes, we would try to order them 13 a car so that they could drink. I was very fond 14 of them. Very fond of them. 15 Q Now, you mentioned Ms. Heard's sister, 16 Whitney. When did you first meet Whitney? 17 A I don't remember exactly when I met 18 Whitney the first time. But I felt, when I first 19 met Whitney, there was something in Whitney that I 20 saw in Whitney that was less -- much less 21 confident than Amber -- much more revealing of 22 insecurities.</p>	<p style="text-align: right;">1678</p> <p>1 Q Was this in the same -- where was 2 Ms. Heard living when you first started your 3 relationship? 4 A Ms. Film – Ms. Heard had informed me 5 that she just moved to a new place on Orange 6 Avenue. 7 Q What city is that in? 8 A Los Angeles, sorry. Yeah. 9 Q And was Whitney also living in 10 Los Angeles? 11 A Whitney was also living in Los Angeles, 12 yes, with Shawn Krajewski and – yeah. 13 Q So how often would you see Whitney when 14 you and Ms. Heard were in a relationship? 15 A Oh, a lot. Whitney would come over all 16 the time with her boyfriend for dinners and such. 17 Ms. Heard always liked having people over, you 18 know, for dinner parties and socially, you know, 19 social kind of events at her place. 20 Q Have you ever done any drugs with 21 Whitney? 22 A Yes.</p>

1679	1 Q How often would you do that? 2 A With Whitney? 3 Q Yes, with Whitney. 4 A Maybe two, two – three times maybe, 5 twice. Three times. 6 Q Did there come a time when Whitney 7 moved into the penthouses that you owned at the 8 Eastern Columbia Building? 9 A Yes. 10 Q And when was that? 11 A I don't remember exactly when it was, 12 but I – I do remember that it was after Rocky 13 Pennington – yes. I believe Joshua was there 14 already as well. Whitney – I can't remember why 15 she needed a place, but she needed a place, so we 16 gave her penthouse 4 to live in. 17 Q And how long did she live there for? 18 A Oh, boy. On and off for, I suppose, a 19 couple of years. 20 Q And how much rent did you charge her? 21 A Nothing. 22 Q Now, you said you did drugs a couple	1681	1 think that something went sideways between 2 Brittany Youssef and the girls because she 3 suddenly just disappeared from the group. 4 Q And when was that? 5 A Probably -- probably a year and a half, 6 maybe two -- no, about two years into the 7 relationship, three years maybe. 8 Q And I believe you mentioned someone 9 named iO, who is that. 10 A IO, iO Tillett Wright was a friend of 11 Ms. Heard's from New York City who was -- who had 12 identified as a -- she was born a female, if 13 that's the right terminology these days, born a 14 female, but she was -- she had chosen -- at a very 15 young age, she had decided that she was a male and 16 she identified as a male. IO seemed to be, again, 17 she was -- she was very intelligent, very 18 literate, kind of a go-get-em kind of activist 19 type, and she was writing a book, I remember, she 20 was writing a book and -- or he was writing a 21 book, rather, and I had a house on one of my -- on 22 Sweetzer, one of the houses there was empty, and
1680	1 times with Whitney. What drugs were you doing 2 with Whitney? 3 A Whitney and I had done a line or two of 4 cocaine together. 5 Q When did you start getting introduced 6 to Ms. Heard's friends after you started your 7 relationship with her? 8 A Almost immediately. Well, in fact, 9 immediately, yeah. Immediately. I was introduced 10 to the whole gang, you know, Rocky, iO, Brittany 11 Youssef, Whitney, certainly. Who else? That's 12 all that comes to mind at the moment. 13 Q You mentioned Rocky. Who was that, 14 specifically? 15 A Raquel Pennington was Ms. Heard's good 16 friend from youth, I suppose. 17 Q And I think you mentioned Brittany 18 Youssef as well. Who was that? 19 A Brittany Youssef was just one of the 20 gals. You know, she was one of the gals, and she 21 was quite bubbly and funny. Real sweet girl. 22 Southern girl. I haven't seen her in – well, I	1682	1 it was, in fact, the house that I'd set up to 2 write in. And when she had no place to stay, or 3 whatever, I -- I called her over and I showed her 4 the house, you know, where the desk was and all 5 the things. And so she -- I said, "Write your 6 book. You know, write your book here," and so she 7 did. 8 Q Did iO end up living in that house or 9 just working there. 10 A No, no. IO ended up -- no, she ended 11 up living in the house for somewhere in the 12 neighborhood of a year, I guess. Somewhere about 13 a year. 14 Q And how much rent did you charge to iO? 15 A Nothing. 16 Q And did there also come a time when 17 Rocky moved into the penthouses at the Eastern 18 Columbia Building? 19 A Rocky moved into penthouse 2. 20 Q And do you recall when that was? 21 A Oh, no. Penthouse 1, sorry. Penthouse 22 1.

<p style="text-align: right;">1683</p> <p>1 That was not long after Ms. Heard and I 2 started to begin to dress that place up as our 3 residence. So it wasn't very long after that, at 4 all, that Rocky and -- Rocky came. I had already 5 had my friend Isaac, who you've met, Isaac Baruch, 6 the painter, I had already given him penthouse 2 7 to stay in and live in and paint in because he 8 had -- he'd just come back from Florida and his 9 mom had passed away, and I think he had about \$3 10 in his pocket. So I gave him the penthouse and 11 asked him if he had enough paint. And, so, he 12 lived there.</p> <p>13 Q Why did Rocky move into the penthouses? 14 MR. ROTTENBORN: Objection. 15 Foundation. 16 THE COURT: I'll overrule foundation. 17 MR. ROTTENBORN: And hearsay. The 18 question potentially calls for hearsay. 19 THE COURT: Hold on. I'll overrule 20 that for the moment. 21 Q Go ahead, Mr. Depp. 22 A Sorry, what was it again?</p>	<p style="text-align: right;">1685</p> <p>1 A Yes, her boyfriend and fiancé, Josh 2 Drew. And then at a certain point, I'd learned 3 that there was another female living there, but I 4 wasn't sure who that was. I didn't know who that 5 was. Because it was -- there were two bedrooms, 6 and, so, she had invited a friend to move in, but 7 I met that person very briefly, a while after 8 they'd already been living there.</p> <p>9 THE COURT: Are we at a good breaking 10 point? 11 MS. MEYERS: That's fine. 12 THE COURT: Okay. We're going to break 13 for the evening. Again, do not discuss the case 14 with anyone and do not do any outside research. 15 See you in the morning at 10 a.m. 16 Okay. You're excused for the day. 17 Thank you. 18 (Whereupon, the jury exited the 19 courtroom and the following proceedings took 20 place.) 21 THE COURT: All right. And, again, 22 sir, since you're in the middle of your testimony,</p>
<p style="text-align: right;">1684</p> <p>1 Q Why did Rocky end up moving into the 2 penthouses? 3 A She ended up moving into the 4 penthouses -- I don't recall. I believe it was 5 something to do with just not having a place. And 6 Amber had asked if I would be okay with, you know, 7 Rocky moving in. And I said, of course. The 8 penthouse is empty. I wasn't in the -- I wasn't 9 going to be renting them out, necessarily, anyway. 10 You know, they were for friends to come and stay. 11 Penthouse 4, in fact, was initially planned out 12 for my sister Christi to have an escape from her 13 3,000 grandchildren and the amount of workload 14 that she had taken on at the company. 15 Q How long did Ms. Pennington end up 16 staying in the penthouses? 17 A Longer than I did. 18 Q And how much rent did you charge to 19 Ms. Pennington? 20 A Nothing. 21 Q Did anyone live with Ms. Pennington in 22 the penthouses?</p>	<p style="text-align: right;">1686</p> <p>1 do not discuss your testimony with anybody, to 2 include your attorneys, this evening, okay? 3 THE WITNESS: Yes, ma'am. 4 THE COURT: All right. You can stand 5 down, if you'd like. 6 All right. Any other matters for this 7 evening? 8 MS. BREDEHOFT: Can we approach? 9 THE COURT: Sure. 10 MS. BREDEHOFT: We never discussed the 11 second alternate. 12 THE COURT: 15 is what I have. The 13 next time we came together, I was going to say 14 that. 15. 15 MS. BREDEHOFT: There's one other minor 16 issue. I don't know, with respect to keeping 17 track of respective times -- 18 THE COURT: Right. 19 MS. BREDEHOFT: -- Counsel for Depp has 20 sent an email to Sammy with an itemization. We 21 had asked, Your Honor may recall, two Fridays ago, 22 I asked them to give me their worksheets with</p>

Transcript of Jury Trial - Day 6
Conducted on April 19, 2022

53 (1687 to
1690)

1687	<p>1 their calculations and everything so I could 2 double-check it, so we could agree on it. They're 3 now refusing to give those to me, so I can't 4 verify any of those and go back and check them. 5 THE COURT: Well, I think -- 6 MS. BREDEHOFT: So I need those. 7 THE COURT: Are they way off? 8 MS. BREDEHOFT: I would have done the 9 calculations too. 10 THE COURT: Right. 11 MS. BREDEHOFT: But they said they were 12 going to do it -- 13 THE COURT: Right. 14 MS. BREDEHOFT: -- the calculations. 15 MS. VASQUEZ: Ms. Bredehoft, I'm here, 16 and I am happy to provide. All we did, Your 17 Honor -- 18 THE COURT: It would be too difficult 19 to do that. I assume you would do yours, and then 20 when your case comes around, you do yours. 21 MS. VASQUEZ: Actually, we have Planet 22 Depos doing it now, but they couldn't go</p>	1689	<p>1 one of them is right there. 2 THE COURT: But I don't -- I mean, do 3 you have calculations of some sort? 4 MS. VASQUEZ: No, Your Honor. What we 5 did is take the total amount of the transcript, 6 which is at the bottom of the transcript, and then 7 just subtracted our designations. 8 THE COURT: Okay. 9 MS. VASQUEZ: We then took a look at 10 their designations. Anything that we both 11 co-designated, we split in half. 12 THE COURT: Okay. 13 MS. VASQUEZ: So it's a calculation 14 that anyone with a transcript can do. 15 THE COURT: Okay. I don't think they 16 have any underlying work product. 17 MS. VASQUEZ: We don't have anything, 18 per se. 19 MS. BREDEHOFT: So when you subtracted, 20 how did you know what to subtract? 21 MS. VASQUEZ: We subtracted the 22 designation.</p>
1688	<p>1 backwards. 2 THE COURT: Okay. 3 MS. BREDEHOFT: That's why they said 4 they were doing those. 5 THE COURT: I guess what she's saying 6 is there are no worksheets? 7 MS. VASQUEZ: There are no worksheets, 8 per se. Ms. Bredehoft just -- 9 MS. BREDEHOFT: There had to be 10 something that had the time, time, time. 11 MS. VASQUEZ: Yeah, it's called the 12 transcript. What we did is anything that was 13 designated was in our colors or your colors -- 14 MS. BREDEHOFT: But you put times on 15 them, right? 16 MS. VASQUEZ: No. We added it and 17 subtracted it. 18 MS. BREDEHOFT: That's what I'm 19 missing, the underlying numbers to add them up. 20 MS. VASQUEZ: All we did is we call -- 21 THE COURT: Hold on. 22 MS. BREDEHOFT: The transcript here,</p>	1690	<p>1 MS. BREDEHOFT: Do you have a number? 2 THE COURT: I'm not going to ask them 3 to provide anything other than they have. If you 4 want to go back -- you have the transcript also. 5 If you want to go back up -- 6 MS. BREDEHOFT: Apparently we are going 7 to have to do that. That takes time. But I 8 haven't agreed to what they sent in -- 9 MS. VASQUEZ: By the way, we're one 10 minute apart. 11 THE COURT: You're kidding. 12 MS. VASQUEZ: No. We're one minute 13 apart. 14 MS. BREDEHOFT: I haven't done any 15 calculations. 16 THE COURT: I don't know. 17 MS. VASQUEZ: I was relying on them 18 telling me. 19 THE COURT: I'm done with this 20 conversation. Right now, that's what I have. If 21 you find something different, you can let Sammy 22 know, but that's what's going in the book right</p>

<p style="text-align: right;">1691</p> <p>1 now. 2 MS. BREDEHOFT: But I don't agree. 3 THE COURT: I understand. That's why 4 you're going to have to do it yourself. 5 Thank you very much. See you tomorrow. 6 THE BAILIFF: All rise. 7 (Whereupon, the trial was recessed at 8 5:04 p.m. to reconvene at 10:00 a.m., Wednesday, 9 April 20, 2022.) 10 11 12 13 14 15 16 17 18 19 20 21 22</p>	
<p style="text-align: right;">1692</p> <p>1 CERTIFICATE OF SHORTHAND REPORTER 2 I, JUDITH E. BELLINGER, RPR, CRR, the 3 court reporter before whom the foregoing hearing 4 was taken, do hereby certify that the foregoing 5 excerpt transcript is a true and correct record of 6 the proceedings; that said proceedings were taken 7 by me stenographically and thereafter reduced to 8 typewriting under my direction; and that I am 9 neither counsel for, related to, nor employed by 10 any of the parties to this case and have no 11 interest, financial or otherwise, in its outcome. 12 IN WITNESS WHEREOF, I have hereunto set 13 my hand and affixed my notarial seal this 20th day 14 of April, 2022. 15 My Commission Expires: September 30, 2024 16 17 18 <i>Judith E. Bellinger</i> 19 _____ 20 NOTARY PUBLIC IN AND FOR 21 THE COMMONWEALTH OF VIRGINIA 22</p>	